

GARMAN TURNER GORDON LLP
 GREGORY E. GARMAN, ESQ.
 Nevada Bar No. 6654
 Email: ggarman@gtg.legal
 WILLIAM M. NOALL, ESQ.
 Nevada Bar No. 3549
 Email: wnoall@gtg.legal
 TALITHA GRAY KOZLOWSKI, ESQ.
 Nevada Bar No. 9040
 Email: tgray@gtg.legal
 DYLAN CICILIANO, ESQ.
 Nevada Bar No. 12348
 Email: dciciliano@gtg.legal
 7251 Amigo Street, Suite 210
 Las Vegas, Nevada 89119
 Telephone: (725) 777-3000
 Facsimile: (725) 777-3112
*Attorneys for Garman Turner Gordon LLP,
 Province, LLC, & Province Fiduciary Services LLC*

**UNITED STATES DISTRICT COURT
 DISTRICT OF NEVADA**

SECURITIES AND EXCHANGE
 COMMISSION,

Plaintiff

v.

MATTHEW WADE BEASLEY, et al.,

Defendants

Case No.: 2:22-cv-00612-CDS-EJY

**STIPULATION AND ORDER TO
 WITHDRAW THE JOINT RESPONSE
 OF PROVINCE LLC, PROVINCE
 FIDUCIARY SERVICES LLC, AND
 GARMAN TURNER GORDON LLP TO
 RECEIVER'S MOTION FOR ORDER IN
 AID OF RECEIVERSHIP ALLOWING
 AND DISALLOWING CLAIMS FROM
 THE RECORD AND THE SUPPORTING
 DECLARATIONS [ECF NOS. 900-902]**

[ECF No. 912]

Province, LLC, Province Fiduciary Services LLC (together, "Province"), and Garman
 Turner Gordon LLP ("GTG"), and together with Province, "Claimants"), on the one hand, and the
 Receiver, Geoff Winkler (the "Receiver"), on the other hand, by and through their respective
 undersigned counsel, hereby stipulate and agree to permit Claimants withdrawal of the Response
 filed at ECF No. 900 and the supporting declarations filed at ECF Nos. 901 and 901 and for the
Receiver's Motion for Order in Aid of Receivership Allowing and Disallowing Claims [ECF No.

890] be treated as unopposed, subject to the Receiver's proposed increase in GTG's allowed non-priority general claim.

CLAIMANTS' RECITALS

1. On May 11, 2026, the *Receiver's Motion for Order in Aid of Receivership Allowing and Disallowing Claims* [ECF No. 890] was filed, which proposed the allowance and disallowance of Claimants' asserted claims, among others (the "Motion").

2. On May 26, 2026, the Claimants filed their *Joint Response of Province LLC, Province Fiduciary Services LLC, and Garman Turner Gordon LLP to Receiver's Motion for Order in Aid of Receivership Allowing and Disallowing Claims* (the "Response") and the supporting declarations of Gregory Garman and Peter Kravitz [ECF Nos. 900-902], seeking to improve the treatment of their respective claims.

3. In an effort to be efficient, the Response was filed as a joint response from Claimants. GTG received substantive draft points and authorities from Province's legal team ("Province's Counsel"). GTG combined a subset of the points and authorities provided by Province's Counsel with GTG's response brief to create a single pleading, which combined pleading was the filed joint Response.

4. On June 2, 2026, the Receiver filed the *Receiver's Reply to Joint Response of Province LLC, Province Fiduciary Services LLC, and Garman Turner Gordon LLP to Receiver's Motion for Order in Aid of Receivership Allowing and Disallowing Claims* (the "Reply") [ECF Nos. 907 and 908], which proposed increasing GTG's claim to be an allowed non-priority general claim of \$199,945.34, with \$43,437.00 of GTG's claim being disallowed.

5. The Reply further expressed that the Receiver was concerned that certain citations in the Response were inaccurate, or otherwise the product of Artificial Intelligence ("AI"), including so-called AI hallucinations and similar quotation or attribution errors.

6. GTG immediately investigated the Receiver's stated concerns. GTG maintains internal procedures and safeguards to comply with its ethical and professional obligations and expectations to verify the accuracy of its briefs and work-product. Here, GTG and its procedures

1 failed in that GTG relied upon the accuracy of the points and authorities of Province's Counsel
2 and did not satisfy GTG's independent obligation to review their cited authority with the care and
3 diligence that is required of GTG.

4 7. GTG has determined that the authorities provided by Province's Counsel were the
5 product of both human and AI work, and that the citations identified by the Receiver were indeed
6 inaccurate. GTG acknowledges its failure to review the accuracy of the citations and apologizes to
7 the Receiver and the Court for its failure to independently review the offending authority cited in
8 the Response brief. GTG is revising its internal procedures to ensure that going forward it not
9 only reviews its own work-product but that of co-counsel and in-house counsel.

10 8. Province assumed that GTG would review its authorities for accuracy. Province
11 similarly apologizes to the Receiver and the Court for its failure to independently review the cited
12 authority. Province will ensure its internal policies are in place requiring all legal briefs prepared
13 using AI be checked for accuracy by a lawyer and apologizes to the Receiver and the Court for its
14 failure to independently review the authority cited in its brief.

15 9. As counsel who filed the brief, GTG failed in its obligation to review Province's
16 Counsel's legal analysis. While GTG had reviewed the authority in its own work-product, which
17 does not contain AI-based inaccuracies, GTG failed to independently review the authority
18 provided to it.

19 10. Upon realizing the error, GTG promptly contacted the Receiver on behalf of the
20 Claimants and advised of what had occurred and proposed that the Response be withdrawn from
21 the record and that the Receiver's Motion proceed unopposed. The Receiver graciously agreed.

22 **NOW, THEREFORE**, in consideration of the foregoing, it is stipulated and agreed that
23 the Response and supporting declarations (ECF Nos. 900-902) be withdrawn from the record and
24 the Receiver's Motion proceed and treated in all respects as unopposed, inclusive of the Receiver's
25 revised proposed allowance and disallowance for GTG's claim as set forth in the Receiver's Reply.

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GARMAN TURNER GORDON LLP

GREENBERG TRAURIG, LLP

By: /s/ Gregory E. Garman

GREGORY E. GARMAN, ESQ.
WILLIAM M. NOALL, ESQ.
TALITHA GRAY KOZLOWSKI, ESQ.
DYLAN CICILIANO, ESQ.
7251 Amigo Street, Suite 210
Las Vegas, Nevada 89119

By: /s/ Kara B. Hendricks

KARA B. HENDRICKS, ESQ.
KYLE A. EWING, ESQ.
10845 Griffith Peak Drive, Suite 600
Las Vegas, Nevada 89135

*Attorneys for Garman Turner Gordon
LLP and Province Fiduciary Services
LLC*

and

SEMENZA KIRCHER RICKARD
JARROD L. RICKARD, ESQ.
KATIE L. CANNATA, ESQ.
10161 Park Run Drive, Suite 150
Las Vegas, Nevada 89145

and

ALLEN MATKINS LECK GAMBLE
MALLORY & NATSIS LLP
DAVID R. ZARO, ESQ.
JOSHUA A. del CASTILLO, ESQ.
MATTHEW D. PHAM
865 South Figueroa Street, Suite 2800
Los Angeles, California 90017

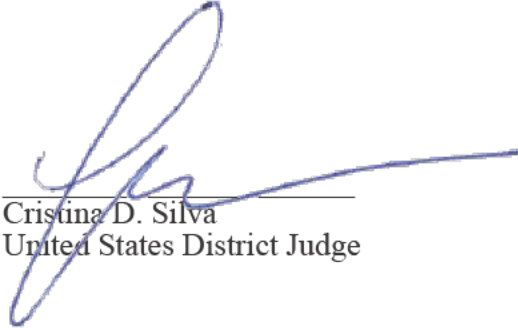
Attorneys for Receiver Geoff Winkler

BASED ON THE FORGOING, IT IS HEREBY ORDERED that:

1. The Response and the Garman and Kravitz Declarations filed at ECF Nos. 900-902 are hereby deemed withdrawn and stricken from the record.

2. The Motion shall proceed and be treated in all respects as unopposed, inclusive of the Receiver's revised proposed allowance and disallowance for GTG's claim set as forth in the Receiver's Reply.

Dated: June 8, 2026


Cristina D. Silva
United States District Judge