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**IN THE UNITED STATES DISTRICT COURT  
FOR THE DISTRICT OF NEVADA**

SECURITIES AND EXCHANGE COMMISSION,

Plaintiff,

vs.

MATTHEW WADE BEASLEY, *et al.*,

Defendants,

THE JUDD IRREVOCABLE TRUST, *et al.*,

Relief Defendants.

CASE NO. 2:22-cv-00612-CDS-EJY

**OMNIBUS MOTION TO APPROVE  
THIRTEENTH QUARTERLY  
APPLICATIONS FOR FEES AND  
REIMBURSEMENT OF EXPENSES  
FOR RECEIVER AND RECEIVER’S  
PROFESSIONALS FOR THE  
PERIOD APRIL 1, 2025,  
THROUGH JUNE 30, 2025**

Geoff Winkler, the Court-appointed Receiver (the “Receiver”), submits this Omnibus Motion to Approve Thirteenth Quarterly Applications for Fees and Reimbursement of Expenses for Receiver and Receiver’s Professionals for the Period from April 1, 2025, through June 30, 2025 (“Motion”).

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This Motion is based on the below memorandum of points and authorities, the Thirteenth Quarterly Application for Payment of Fees and Reimbursement of Expenses for Receiver and Receiver's Professionals Greenberg Traurig, LLP, and Aitheras, LLC, for the Period April 1, 2025, Through June 30, 2025 (ECF No. 836) ("Thirteenth Quarterly Fee App, ECF No. 836"), Thirteenth Quarterly Application for Payment of Fees and Reimbursement of Expenses of Receiver's Counsel: (1) Allen Matkins Leck Gamble Mallory & Natsis, LLP; and (2) Semenza Rickard Law (ECF No. 837 (with declarations supporting, ECF Nos. 838 and 839)) ("Thirteenth Quarterly Fee App, ECF No. 837") (together, the "Thirteenth Quarterly Fee Applications"), filed concurrently herewith, the pleadings and papers on file herein, and such other and further information as may be presented to the Court at the time of any hearing.

DATED this 7<sup>th</sup> day of August 2025.

**GREENBERG TRAURIG, LLP**

*/s/ Kara B. Hendricks*

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## **MEMORANDUM OF POINTS AND AUTHORITIES**

### **I. INTRODUCTION**

By and through the subject Motion, the Receiver respectfully requests the allowance and payment of his fees and costs and the fees and costs of the professionals he employed to assist him in fulfilling his duties under the Receiver Order, incurred for the period from April 1, 2025, through June 30, 2025 (the "Application Period"). The Receiver and his counsel provided copies of billing

entries to counsel for the Securities & Exchange Commission (“SEC”) and SEC staff has reviewed and provided comments on the fee statements and does not oppose the interim request for approval and payment of the fees and costs sought herein.<sup>1</sup>

Because the Receiver is not a licensed attorney, does not have in-house counsel, and due to the scope of service needed during the Application Period he employed professionals to assist him in fulfilling his duties as the Receiver. Specifically, pursuant to Section 7(F) of the Receiver Order, the Receiver proposed retaining Greenberg Traurig LLP (“Greenberg Traurig”), Allen Matkins Leck Gamble Mallory & Natsis LLP (“Allen Matkins”), as counsel (ECF No. 90) and Semenza Rickard Law (formerly, Semenza Kircher Rickard; “SR Law”) as conflicts counsel (ECF No. 108). Additionally, the Receiver proposed the retention of Aitheras, LLC (“Aitheras”) as litigation support consultant (ECF No. 455). As further detailed below, during the Application Period, the Receiver and his professionals endeavored to avoid duplication of efforts, and to undertake required tasks in as efficient a manner as possible, utilizing personnel best suited to the task. Additionally, the complexity of the Receivers tasks, the value of the services provided, the quality of the work performed, the benefits obtained on behalf of the receivership estate, and the burden of the fee request on the receivership estate warrant approval of the same.

The Receiver and his professionals seek approval of the following fees and costs for this Application Period, on an interim basis:

- (1) Receiver fees of \$643,709.00 and costs of \$5,871.64;
- (2) Greenberg Traurig fees of \$75,425.91 and costs of \$58.61;
- (3) Aitheras fees of \$32,963.44;
- (4) Allen Matkins fees of \$71,746.85 and costs of \$1,020.30; and
- (5) SR Law fees of \$1,769.50.

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<sup>1</sup> Invoices for the Application period were provided to the SEC for review on July 24, 2025. In light of the early application filing, the SEC’s review of AFS’s billing entries is ongoing. Any comments the SEC provides that result in changes to the final amount of fees or costs will be addressed in an appropriate supplement or errata in advance of any hearing.

By way of this Motion, the Receiver requests the Court's interim approval of 100% of the fees and expenses incurred during the Application Period and further requests the interim payment of (1) 80% of the fees and 100% of the expenses incurred by the Receiver and the Receiver's Counsel; and (2) 100% of the fees incurred by Aitheras, each to be paid from the funds of the receivership estate (the "Receivership Estate").

## II. RELEVANT BACKGROUND

The SEC initiated this action against J&J Consulting Services, Inc., an Alaska corporation, J&J Consulting Services, Inc., a Nevada corporation, J and J Purchasing LLC, The Judd Irrevocable Trust and BJ Holdings LLC (collectively, the "J&J Receivership Defendants") and others on April 12, 2022 (ECF No. 1) and concurrently with the Complaint filed an *ex parte* motion for temporary restraining order seeking, among other things, the freezing of defendants' assets, an accounting, an order prohibiting the destruction of documents seeking the appointment of a receiver over the J&J Receivership Defendants (ECF No. 2). The Court granted the *ex parte* temporary restraining order, in part, by allowing the asset freeze to proceed but set the motion for a hearing in order to provide defendants an opportunity to be heard on the temporary receivership request (ECF No. 3). On April 21, 2022, a hearing was held and the Court found grounds to enter a preliminary injunction, asset freeze, and other equitable relief. (ECF No. 56). Thereafter, on May 3, 2022 the SEC filed a motion to appoint receiver and requested related relief. (ECF No. 67). On June 3, 2022 an Order was entered appointing Geoff Winkler as Receiver ("Receiver Order" or "Appointment Order"). (ECF No. 88).<sup>2</sup>

Upon his appointment, the Receiver immediately began a diligent review of the business and financial affairs of the Receivership Defendants and undertook efforts to marshal assets for the Receivership Estate in furtherance of his Court-ordered duties and responsibilities. The Receiver has made substantial progress, particularly in connection with his efforts to assert control over the Receivership Entities and identify and marshal their assets for the benefit of the receivership estate, investors, and other creditors. These efforts are further detailed in the Thirteenth Quarterly Status

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<sup>2</sup> On July 29, 2022, this Court entered an order expanding the original receivership order to apply to additional defendants (*see* ECF No. 207).

Report (ECF No. 832), which details the efforts of the Receiver and his counsel, including substantial progress on critical elements of Estate administration, including: obtaining and review of additional bank records and financial documents, communication with creditors and evaluation of potential claims; preparation and filing of the Motion for Order in Aid of Receivership 1) Setting a Claims Bar Date, 2) Approving Proposed Claim Form, and 3) Approving Summary Claim Procedures (“Claims Motion”) (ECF No. 821); continued discussions with certain Defendants and their respective counsel; continued efforts to facilitate the turnover of receivership assets; working with special litigation counsel to assemble evidence in support of the Receiver’s claims; communications with investors including gathering information from investor surveys to assist the Receiver; continuing the process of liquidating assets; evaluating and assessing certain Defendant’s business assets; continued efforts relating to the turnover order and fee award entered against Aaron Grigsby; communications with counsel for the SEC; evaluating third party recovery potential; and preparation and filing of matters with the Court for the benefit of the Receivership Estate.<sup>3</sup> The Receiver’s highly successful efforts have resulted in the recovery or anticipated recovery of assets, including cash, cryptocurrency, personal property, real properties and other with an estimated gross value of more than \$217 million. This includes anticipated third-party litigation recovery which Receiver anticipates will provide a substantial benefit to the estate.

Further specifics regarding the efforts of the Receiver and his team from American Fiduciary Services (“AFS”) and Greenberg Traurig are detailed in the Thirteenth Quarterly Fee App, ECF No. 836. Additional details regarding the activities and services provided by Allen Matkins Leck Gamble Mallory & Natsis, LLP and Semenza Rickard Law are set forth in their Thirteenth Quarterly Fee App, ECF No. 837.

### III. LEGAL AUTHORITY

“The power of a district court to impose a receivership ... derives from the inherent power of a court of equity to fashion effective relief.”<sup>4</sup> “The primary purpose of equity receiverships is

<sup>3</sup> The Receiver’s efforts were bolstered by the services provided by Aitheras including, but not limited to the development of data storage and forensic data collection.

<sup>4</sup> *SEC v. Wencke*, 622 F.2d 1363, 1369 (9th Cir. 1980).

1 to promote orderly and efficient administration of the Receivership Estate by the district court for  
 2 the benefit of creditors.”<sup>5</sup> “[T]he practice in administering an estate by a receiver ... must accord  
 3 with the historical practice in federal courts or with a local rule.”<sup>6</sup>

4 As the Ninth Circuit explained:

5 A district court’s power to supervise an equity receivership and to  
 6 determine the appropriate action to be taken in the administration of  
 7 the receivership is extremely broad. The district court has broad  
 8 powers and wide discretion to determine the appropriate relief in an  
 9 equity receivership. The basis for this broad deference to the district  
 10 court’s supervisory role in equity receiverships arises out of the fact  
 11 that most receiverships involve multiple parties and complex  
 12 transactions.<sup>7</sup>

13 Decisions regarding the timing and amount of an award of fees and expenses to the Receiver  
 14 and his or her professionals are committed to the sound discretion of the Court.<sup>8</sup> In determining  
 15 the reasonableness of fees and expenses requested in this context, the Court should consider the  
 16 time records presented, the quality of the work performed, the complexity of the problems faced,  
 17 and the benefit of the services rendered to the Estate, along with the SEC’s position on the request,  
 18 which is entitled to “great weight.”<sup>9</sup>

#### 19 **IV. THE FEES AND EXPENSES INCURRED ARE REASONABLE AND SHOULD BE** 20 **ALLOWED**

21 The Receiver and his counsel respectfully submit that the fees and expenses incurred during  
 22 the Application Period were fair, reasonable, necessary, and significantly benefited the Estate.  
 23 Importantly, efforts were taken to avoid duplication of efforts and to undertake required tasks in as  
 24 efficient manner as possible, utilizing personnel best suited to the task consistent with the  
 25 complexity of the tasks required with the goal of providing high quality work that benefits the  
 26

27 <sup>5</sup> *SEC v. Hardy*, 803 F.2d 1034, 1038 (9th Cir. 1986.)

28 <sup>6</sup> Fed. R. Civ. P. 66.

<sup>7</sup> *SEC v. Capital Consultants, LLC*, 397 F.3d 733, 738 (9th Cir. 2005) (citations omitted); see also *CFTC v. Topworth Int’l, Ltd.*, 205 F.3d 1107, 1115 (9th Cir. 1999) (“This court affords ‘broad deference’ to the court’s supervisory role, and ‘we generally uphold reasonable procedures instituted by the district court that serve th[e] purpose of orderly and efficient administration of the receivership for the benefit of creditors.’”).

<sup>8</sup> See *SEC v. Elliot*, 953 F.2d 1560, 1577 (11th Cir. 1992) (rev’d in part on other grounds, 998 F.2d 922 (11th Cir. 1993)).

<sup>9</sup> *SEC v. Fifth Ave. Coach Lines, Inc.*, 364 F. Supp. 1220, 1222 (S.D.N.Y. 1973).

1 receivership estate.

2 **A. Efforts to Avoid Duplication.**

3 During the Application Period, the Receiver and his professionals endeavored to avoid  
4 duplication of efforts, and to undertake required tasks in as efficient a manner as possible, utilizing  
5 personnel best suited to the task. Among other things, the Receiver and select representatives  
6 among his professionals held weekly videoconference meetings to identify outstanding tasks,  
7 assign to each outstanding task a measure of urgency or importance, and determine which of the  
8 Receiver's professionals would be responsible for completing the task, and when. As reflected in  
9 the invoices submitted in support of the Thirteenth Quarterly Fee Applications, many of the tasks  
10 undertaken by the Receiver and his professionals required immediate attention.

11 As was the case in previous reporting periods, and by way of example, Allen Matkins  
12 devoted efforts to obtain financial documents and other information critical to the Receiver's  
13 administration of the Estate and forensic accounting, leading insurance recovery efforts, and  
14 communication and evaluation of creditor claims, while Greenberg Traurig took the lead on  
15 working with Defendants, their counsel, assisted with investor communication, prepared the claims  
16 motion, assisted in asset recovery efforts and filed necessary motions with the court relating to the  
17 same. Additionally, Greenberg Traurig has taken the lead on handling the continued issues related  
18 to Aaron and Abira Grigsby, and preparation of the claims motion. This division of work has  
19 significantly benefitted the estate, as reflected in the Court's prior favorable orders on the  
20 Receiver's motions and stipulations filed for the sale and/or turnover of property, motions relating  
21 to the turnover of attorney fees, and in the progress made by the Receiver to-date in connection  
22 with the identification and marshaling of valuable receivership assets.

23 Although, on occasion, the Receiver and his professionals were required to engage in efforts  
24 that overlapped to a degree they consistently endeavored to limit such overlap, and to ensure that  
25 each task was undertaken by the appropriate, and smallest, group of professionals necessary and  
26 sufficient to maximize the likelihood of a successful outcome. These efforts have continued  
27 beyond the Application Period.

28 ///



**B. Complexity of Receivers Tasks and Quality of Work Performed.**

As detailed in the Thirteenth Quarterly Status Report, and the Thirteenth Quarterly Fee Applications filed concurrently herewith, the Receiver and his professionals were required to expend significant time and effort to preserve the *status quo*, pursue the recovery of receivership assets, and enormous effort was made verify information in the Forensic Accounting and prepare for the upcoming claims process, this work included, but was not limited to obtaining additional bank records and cross referencing materials, communication with numerous Defendants and communication with investors.<sup>10</sup> Not only is the Forensic Accounting important to this matter, but it is also being utilized in the Wells Fargo litigation proceeding and the AFS team worked with counsel in the ongoing litigation to meet court deadlines and case needs and being utilized to streamline the claims filing process.

**C. Fair Value of Receiver's Time and Reasonableness of Expenses on Receivership Estate.**

As set forth in the applications made to this court to facilitate the Receiver employing counsel (ECF Nos. 90 and 108), and as referenced in the Thirteenth Quarterly Fee Applications, the attorneys working on this matter are doing so at *heavily* discounted rates far below the market or “rack” rates charged in non-receivership matters, notwithstanding the complexity of the present receivership case or the amounts in controversy. Additionally, efforts have been taken to avoid duplicate efforts of counsel. Further, AFS is also providing significant discounts and performs a substantial amount of work in-house, saving both time and money, including tasks involving corporate accounting, forensic accounting, case administration, claims administration, asset valuation, investor communications and internet technology. The significantly reduced rates being charged in this matter, along with efforts to avoid duplication and streamline task demonstrate the reasonableness of the fees requested. Additionally, as demonstrated in the Receiver's Motion to Employ Litigation Support Consultant (ECF No. 455), the fees charged by Aitheras represent a significant savings over other companies offering similar services.

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<sup>10</sup> The Receiver anticipates additional updates may be necessary to the Forensic Accounting as additional documentation continues to be received and analyzed.



1 When it comes to evaluating the burden of the expenses and the ability of the receivership  
2 estate to reasonably bear the same, it is important to look at the case as a whole. In its Complaint  
3 (as amended), the SEC has alleged causes of action arising from an alleged investment scheme,  
4 whereby hundreds of millions of dollars in investments were successfully solicited based on claims  
5 that funds invested would be backed by settlements to be paid out in litigation across the country.  
6 (ECF No. 118). In addition, the SEC has alleged that investor funds were diverted by certain  
7 defendants to purchase luxury homes, a private aircraft, and multiple luxury automobiles, among  
8 other things. (*Id.*) The Receiver's ability to recover cash and assets anticipated to be in excess of  
9 \$215 million dollars is not insignificant and is an important consideration when evaluating the fees  
10 requested and their potential impact on the estate.

11 As compared to the value of the assets recovered, the Receiver and his professionals' fees  
12 in their entirety (to say nothing of the fact that they have requested payment of fees at an interim  
13 rate of only 80% of actual fees incurred) are nominal. Moreover, the Receiver and his team continue  
14 to recover assets and are evaluating additional avenue to recover from third parties in order to  
15 achieve the most equitable outcome possible for all stakeholders. Accordingly, approval of the  
16 fees requested is appropriate.

17 **D. Communication with SEC Counsel.**

18 The fees requested by the Receiver and his professionals were reviewed and will continue  
19 to be reviewed by the SEC staff prior to their submittal to this Court and where appropriate,  
20 additional revisions made. As set forth in the Appointment Order (ECF No. 88), the Receiver  
21 and his team provide SEC Counsel a complete copy of relevant billing information in advance of  
22 filing this fee request. The SEC staff then reviews the invoices and can provide comments to the  
23 Receiver prior to the filing of the fee application. The Receiver and his professionals are sensitive  
24 to the feedback received from the staff and received minimal comments for the invoices  
25 submitted for this Application Period all of which have been incorporated into the invoices  
26 submitted at this time. As referenced above, the SEC is currently in the process of reviewing the  
27 AFS invoices for the Application and should there be comments which affect the final amount of  
28 fees or costs sought, the Receiver will file an appropriate supplement or errata to address the same.

**Importantly, for purposes of the current application, SEC counsel has informed the Receiver that the SEC does not oppose the filing of the fee request, but reserved the right to provide further comments regarding AFS billing entries.**

In addition to discounting rates for this matter and following their own firm best practices for ethical and commercially reasonable billing, the Receiver and his counsel work to ensure that all billing standards meet or exceed both (i) the SEC's Billing Instructions for Receivers in Civil Actions Commenced by the U.S. Securities and Exchange Commission (the "Billing Instructions") and (ii) the U.S. Trustee's Guidelines for Reviewing Applications for Compensation and Reimbursement of Expenses.<sup>11</sup> The Billing Instructions and Trustee's Guidelines have been developed iteratively by the SEC and U.S. Trustee specifically to ensure that receivers, trustees, and any professionals or others employed by them charge only reasonable and necessary fees and expenses to a receivership or bankruptcy estate.

The Billing Instructions followed by the submitting parties include requirements that each professional and paraprofessional keep contemporaneous billing records and record time in increments of tenths of an hour and that time records provide reasonable detail and narrative.<sup>12</sup> Each entry must also identify an SEC approved category for the work performed.<sup>13</sup> Certain work performed by the Receiver and counsel that might otherwise be billable in a different context is not included in the invoices submitted to this Court and written off presumptively by the respective parties. This includes time spent preparing fee applications and documentation in support of the same as well as many administrative tasks. Additionally, the Receiver and counsel routinely write off time associated with internal communication and training.

Further, consistent with SEC guidelines, only certain types of costs are included in the invoices submitted. Allowed expenses per SEC guidelines include filing fees, process service fees, expert witness fees, court reporter fees, lines and title expense, postage, parking, and travel.<sup>14</sup> SEC guidelines also allow for reimbursement for photocopying and telephone charges. However, such

<sup>11</sup> The Billing Instructions are available online at [www.sec.gov/oiea/Article/billinginstructions.pdf](http://www.sec.gov/oiea/Article/billinginstructions.pdf).

<sup>12</sup> See, [www.sec.gov/oiea/Article/billinginstructions.pdf](http://www.sec.gov/oiea/Article/billinginstructions.pdf).

<sup>13</sup> *Id.*

<sup>14</sup> *Id.*

1 photocopying and telephone expenses are already voluntarily excluded from the invoices and  
2 applications submitted in this case.

3 When it comes to travel, the Receiver and his team are also limited in what they can seek  
4 reimbursement for and are cost conscious. Notably, per SEC guidelines, long distance travel  
5 outside a twenty (20) mile radius of the applicant's office is reimbursable at fifty percent (50%) of  
6 the applicant's regular billing rate, and reimbursement is subject to specific travel restrictions and  
7 limitations.<sup>15</sup> The Receiver and his team follow the guidelines, which specify: 1) they seek the  
8 and use the lowest airfare; 2) luxury accommodations and deluxe meals are not reimbursable;  
9 3) personal and incidental charges are not included; and 4) expenses over \$75 require a receipt. In  
10 regard to hotel selection, the Receiver books accommodations based on availability and costs, and  
11 the Receiver and his team strive to find reasonable accommodations, taking into account fluctuating  
12 prices due to conferences and events in Las Vegas.

13 Cognizant of the fees and expenses and the impact they can have on the Receivership Estate,  
14 Mr. Winkler reviews both the invoices from his team of professionals and American Fiduciary  
15 Services ("AFS") on a monthly basis. In so doing, he looks to identify inefficiencies and cuts any  
16 time entries and requests for reimbursement he believes are excessive or inconsistent with the  
17 Billing Instructions and/or U.S. Trustee's Guidelines. After Mr. Winkler's review, the invoices are  
18 sent directly to counsel for the SEC for their review an input under both the Billing Instructions  
19 standards and counsel's experience and discretion. Although the Appointment Order (ECF No. 88)  
20 specifies that the SEC be provide with drafts of quarterly fee applications 30 days prior to the same  
21 being filed, in this case, the Receiver and his team work to provide the SEC the invoices in a timely  
22 manner.

23 In regard to the fees and costs requested in the Thirteenth Quarterly Fee Applications, the  
24 process outlined above was utilized with (1) the professionals responsible reviewing their own  
25 invoices on a monthly basis, (2) the Receiver then reviewing the invoices on a monthly basis, and  
26 (3) the Receiver then providing the same to counsel for the SEC for its review. Staff for the SEC  
27 then reviewed the invoices and can (and did) provide comments to the Receiver prior to the filing

28 <sup>15</sup> *Id.*

of the fee application. The Receiver and his professionals are sensitive to the feedback received from SEC staff. For the Thirteenth Quarterly Fee Applications, minimal concerns relating to the invoices submitted were raised by the SEC. However, the comments made were addressed and/or incorporated. At the SEC's request, certain time was written off and not included in the subject submittal.

It is also important to note that, consistent with the billing guidelines of the SEC, the Receiver and the applicable law firms are seeking payment of 80% of their fees with the remaining, unpaid twenty percent (20%) as a "holdback" of approved fees, subject to final review and payment only at the conclusion of this Receivership. This provides additional security, should the Court have any additional concerns not addressed in the amended filings. Indeed, the 20% hold back provides a buffer and an additional opportunity for final consideration when the case is complete.

## V. CONCLUSION

Based on the foregoing, the Receiver and his counsel request that the Court approve the fees and expenses as noted herein, and also authorize the payment of those fees and expenses on a percentage, interim basis. Specifically, the Receiver and his counsel request entry of an order<sup>16</sup> Granting this Omnibus Motion in its entirety and approving the following fees and costs incurred for this Application Period as follows:

- (1) Receiver fees of \$643,709.00 and costs of \$5,871.64;
- (2) Greenberg Traurig fees of \$75,425.91 and costs of \$58.61;
- (3) Aitheras fees of \$32,963.44;
- (4) Allen Matkins fees of \$71,746.85 and costs of \$1,020.30; and
- (5) SR Law fees of \$1,769.50.

The Receiver respectfully requests the Court's interim approval of 100% of the fees and expenses incurred during the Application Period and further requests the interim payment of (1) 80% of the fees and 100% of the expenses incurred by the Receiver and the Receiver's Counsel;

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///

<sup>16</sup> The form of the proposed order is attached as **Exhibit 1**.

1 and (2) 100% of the fees incurred by Aitheras. The Receiver further requests any other and further  
2 relief as the Court deems just and appropriate.

3 DATED this 7<sup>th</sup> day of August 2025.

4 **GREENBERG TRAUIG, LLP**

5 */s/ Kara B. Hendricks*

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7 Nevada Bar No. 07743

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17 **ALLEN MATKINS LECK GAMBLE**

18 **MALLORY & NATSIS LLP**

19 *Attorneys for Receiver Geoff Winkler*

**CERTIFICATE OF SERVICE**

Pursuant to Fed. R. Civ. P. 5(b), I hereby certify that on the 7<sup>th</sup> day of August 2025, a true and correct copy of the foregoing **OMNIBUS MOTION TO APPROVE THIRTEENTH QUARTERLY APPLICATIONS FOR FEES AND REIMBURSEMENT OF EXPENSES FOR RECEIVER AND RECEIVER'S PROFESSIONALS FOR THE PERIOD FROM APRIL 1, 2025, THROUGH JUNE 30, 2025** was filed electronically via the Court's CM/ECF system. Notice of filing will be served on all parties registered to this case by operation of the Court's CM/ECF system, and parties may access this filing through the Court's CM/ECF system.

/s/ Evelyn Escobar-Gaddi

An employee of GREENBERG TRAURIG, LLP

## LIST OF EXHIBITS

## EXHIBIT

## DESCRIPTION

Exhibit 1

[PROPOSED] ORDER



# EXHIBIT 1

# EXHIBIT 1

Proposed Order

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**IN THE UNITED STATES DISTRICT COURT  
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Defendants,

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Relief Defendants.

CASE NO. 2:22-cv-00612-CDS-EJY

**[PROPOSED] ORDER GRANTING  
OMNIBUS MOTION TO APPROVE  
THIRTEENTH QUARTERLY  
APPLICATIONS FOR FEES AND  
REIMBURSEMENT OF EXPENSES  
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PROFESSIONALS FOR THE  
PERIOD FROM APRIL 1, 2025,  
THROUGH JUNE 30, 2025**

The Court having reviewed the Omnibus Motion to Approve Thirteenth Quarterly Applications for Fees and Reimbursement of Expenses for Receiver and Receiver's Professionals for the Period from April 1, 2025, through June 30, 2025; the Thirteenth Quarterly Application for Payment of Fees and Reimbursement of Expenses for Receiver and Receiver's Professionals Greenberg Traurig, LLP, and Aitheras, LLC, for the Period April 1, 2025, Through June 30, 2025 (ECF No. 836); the Thirteenth Quarterly Application for Payment of Fees and Reimbursement of

Expenses of Receiver's Counsel: (1) Allen Matkins Leck Gamble Mallory & Natsis, LLP; and (2) Semenza Rickard Law (ECF No. 837 (with declarations supporting, ECF Nos. 838, and 839)); and the Court having found that notice was proper and that good cause exists to approve the same,

**IT IS HEREBY ORDERED, ADJUDGED AND DECREED THAT** the Omnibus Motion to Approve Thirteenth Quarterly Applications for Fees and Reimbursement of Expenses for Receiver and Receiver's Professionals for the Period from April 1, 2025, through June 30, 2025, is hereby GRANTED and:

- (1) Receiver fees of \$643,709.00 and costs of \$5,871.64 are allowed;
- (2) Greenberg Traurig fees of \$75,425.91 and costs of \$58.61 are allowed;
- (3) Aitheras fees of \$32,963.44 are allowed;
- (4) Allen Matkins fees of \$71,746.85 and costs of \$1,020.30 are allowed; and
- (5) SR Law fees of \$1,769.50 are allowed.

The Receiver is hereby authorized to pay 80% of the allowed fees and 100% of the allowed costs incurred by the Receiver, Greenberg Traurig, Allen Matkins, and SR Law from funds on hand in the receivership estate. The Receiver is further authorized to pay 100% of the allowed fees incurred by Aitheras from funds on hand in the receivership estate.

**IT IS SO ORDERED.**

UNITED STATES DISTRICT COURT JUDGE

Dated: \_\_\_\_\_