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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
FOURTEENTH QUARTERLY
APPLICATIONS FOR FEES AND
REIMBURSEMENT OF EXPENSES
FOR RECEIVER AND RECEIVER’S
PROFESSIONALS FOR THE
PERIOD JULY 1, 2025,
THROUGH SEPTEMBER 30, 2025**

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

///

This Motion is based on the below memorandum of points and authorities, the Fourteenth 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 July 1, 2025, Through September 30, 2025 (ECF No. **855**) ("Fourteenth Quarterly Fee App, ECF No. **855**"), Fourteenth 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. **852** (with declarations supporting, ECF Nos. **853** and **854**)) ("Fourteenth Quarterly Fee App, ECF No. **852**") (together, the "Fourteenth 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 17th day of November, 2025.

GREENBERG TRAURIG, LLP

/s/ Kara . Hendricks

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Nevada Bar No. 07743

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Attorneys for Receiver Geoff Winkler

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 July 1, 2025, through September 30, 2025 (the "Application Period"). The Receiver and his counsel provided copies of

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

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

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

- 19 (1) Receiver fees of \$815,161.00 and costs of \$20,725.03;
- 20 (2) Greenberg Traurig fees of \$52,661.78 and costs of \$823.16;
- 21 (3) Aitheras fees of \$36,002.27;
- 22 (4) Allen Matkins fees of \$93,370.50 and costs of \$1,514.43; and
- 23 (5) SR Law fees of \$623.50.

24 By way of this Motion, the Receiver requests the Court’s interim approval of 100% of the
 25 fees and expenses incurred during the Application Period and further requests the interim payment
 26

27 ¹ Invoices for the Application period were provided to the SEC for review on July 24, 2025. In light of the
 28 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.

1 of (1) 80% of the fees and 100% of the expenses incurred by the Receiver and the Receiver's
2 Counsel; and (2) 100% of the fees incurred by Aitheras, each to be paid from the funds of the
3 receivership estate (the "Receivership Estate").

4 **II. RELEVANT BACKGROUND**

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

19 Upon his appointment, the Receiver immediately began a diligent review of the business
20 and financial affairs of the Receivership Defendants and undertook efforts to marshal assets for the
21 Receivership Estate in furtherance of his Court-ordered duties and responsibilities. The Receiver
22 has made substantial progress, particularly in connection with his efforts to assert control over the
23 Receivership Entities and identify and marshal their assets for the benefit of the receivership estate,
24 investors, and other creditors. The efforts, by the Receiver and his counsel, are further detailed in
25 the Fourteenth Quarterly Status Report (ECF No. 851), and include substantial progress on critical
26 elements of the receivership, related to: communication with Defendants and counsel following the
27

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

completion of the substantive forensic accounting report (“Forensic Accounting”) (ECF No. 792), to address Defendant specific questions and concerns; discussions with counsel for the SEC to facilitate agreements with certain Defendants; further analysis and revisions relating to Defendant and investors accounts identified in the Forensic Accounting; commencing the claims process and working in depth with the Receiver’s claim agent to notice investors; providing an informational claims clinic for investors to assist with claims process; evaluating and assessing certain Defendant’s business assets; monitoring bankruptcy proceedings of Aaron Grigsby and Abira Grigsby to protect estate assets; evaluating third-party recovery potential; continued evaluation of electronically stored documents; and preparation and filing of matters with the Court for the benefit of the Receivership Estate.³ 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 \$185 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 Fourteenth Quarterly Fee App, ECF No. **855**. 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 Fourteenth Quarterly Fee App, ECF No. **852**.

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.”⁴ “The primary purpose of equity receiverships is to promote orderly and efficient administration of the Receivership Estate by the district court for the benefit of creditors.”⁵ “[T]he practice in administering an estate by a receiver ... must accord with the historical practice in federal courts or with a local rule.”⁶

³ 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.

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

⁵ *SEC v. Hardy*, 803 F.2d 1034, 1038 (9th Cir. 1986.)

⁶ Fed. R. Civ. P. 66.

As the Ninth Circuit explained:

A district court's power to supervise an equity receivership and to determine the appropriate action to be taken in the administration of the receivership is extremely broad. The district court has broad powers and wide discretion to determine the appropriate relief in an equity receivership. The basis for this broad deference to the district court's supervisory role in equity receiverships arises out of the fact that most receiverships involve multiple parties and complex transactions.⁷

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

IV. THE FEES AND EXPENSES INCURRED ARE REASONABLE AND SHOULD BE ALLOWED

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

A. Efforts to Avoid Duplication.

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

⁷ *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.'").

⁸ 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)).

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

1 personnel best suited to the task. Among other things, the Receiver and select representatives
2 among his professionals held weekly videoconference meetings to identify outstanding tasks,
3 assign to each outstanding task a measure of urgency or importance, and determine which of the
4 Receiver's professionals would be responsible for completing the task, and when. As reflected in
5 the invoices submitted in support of the Fourteenth Quarterly Fee Applications, many of the tasks
6 undertaken by the Receiver and his professionals required immediate attention.

7 As was the case in previous reporting periods, and by way of example, Allen Matkins
8 devoted efforts to obtain financial documents and other information critical to the Receiver's
9 administration of the Estate and forensic accounting, leading insurance recovery efforts, and
10 communication and evaluation of creditor claims, while Greenberg Traurig took the lead on
11 working with Defendants and their counsel, assisting with investor communications, continuing
12 efforts related to the start of the claims process, including, hosting an in-person claims clinic in Las
13 Vegas, wherein, meetings were held with over 40 claimants, and assisted in asset recovery efforts,
14 filing necessary motions with the court related to same. Additionally, Greenberg Traurig has taken
15 the lead on handling the continued issues related to Aaron and Abira Grigsby. This division of
16 work has significantly benefitted the estate, as reflected in the Court's prior favorable orders on the
17 Receiver's motions and stipulations filed for the sale and/or turnover of property, motions relating
18 to the turnover of attorney fees, and in the progress made by the Receiver to-date in connection
19 with the identification and marshaling of valuable receivership assets.

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

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

26 As detailed in the Fourteenth Quarterly Status Report, and the Fourteenth Quarterly Fee
27 Applications filed concurrently herewith, the Receiver and his professionals were required to
28 expend significant time and effort to preserve the *status quo*, pursue the recovery of receivership

1 assets, and enormous effort was made verify information in the Forensic Accounting and prepare
2 for the upcoming claims process, this work included, but was not limited to obtaining additional
3 bank records and cross referencing materials, communication with numerous Defendants and
4 communication with investors.¹⁰ Not only is the Forensic Accounting important to this matter, but
5 it is also being utilized in the Wells Fargo litigation proceeding and the AFS team worked with
6 counsel in the ongoing litigation to meet court deadlines and case needs and being utilized to
7 streamline the claims filing process.

8 **C. Fair Value of Receiver’s Time and Reasonableness of Expenses on**
9 **Receivership Estate.**

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

23 When it comes to evaluating the burden of the expenses and the ability of the receivership
24 estate to reasonably bear the same, it is important to look at the case as a whole. In its Complaint
25 (as amended), the SEC has alleged causes of action arising from an alleged investment scheme,
26 whereby hundreds of millions of dollars in investments were successfully solicited based on claims
27

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

1 that funds invested would be backed by settlements to be paid out in litigation across the country.
2 (ECF No. 118). In addition, the SEC has alleged that investor funds were diverted by certain
3 defendants to purchase luxury homes, a private aircraft, and multiple luxury automobiles, among
4 other things. (*Id.*) The Receiver's ability to recover cash and assets anticipated to be in excess of
5 \$185 million dollars is not insignificant and is an important consideration when evaluating the fees
6 requested and their potential impact on the estate.

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

13 **D. Communication with SEC Counsel.**

14 As set forth in the Appointment Order (ECF No. 88), the Receiver and his team provide
15 SEC Counsel a complete copy of relevant billing information in advance of filing this fee request.
16 This provides SEC staff with an opportunity to review the invoices and provide comments to the
17 Receiver prior to the filing of the fee application.

18 For this reporting period, invoices were provided to SEC staff for review, however, due to
19 a lapse in appropriations due to the government shutdown, SEC staff did not have an opportunity
20 to fully review and comment on the same. Notwithstanding, the SEC has indicated that they do
21 not oppose the filing of this application or approval of the payment requested on an interim basis,
22 but reserve rights for final approval. The Receiver has advised SEC staff that his team is willing
23 to consider any comments and make any necessary adjustments with the next fee application.

24 In addition to discounting rates for this matter and following their own firm best practices
25 for ethical and commercially reasonable billing, the Receiver and his counsel work to ensure that
26 all billing standards meet or exceed both (i) the SEC's Billing Instructions for Receivers in Civil
27 Actions Commenced by the U.S. Securities and Exchange Commission (the "Billing Instructions")
28 and (ii) the U.S. Trustee's Guidelines for Reviewing Applications for Compensation and

Reimbursement of Expenses.¹¹ 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.¹² Each entry must also identify an SEC approved category for the work performed.¹³ 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.¹⁴ SEC guidelines also allow for reimbursement for photocopying and telephone charges. However, such photocopying and telephone expenses are already voluntarily excluded from the invoices and applications submitted in this case.

When it comes to travel, the Receiver and his team are also limited in what they can seek reimbursement for and are cost conscious. Notably, per SEC guidelines, long distance travel outside a twenty (20) mile radius of the applicant's office is reimbursable at fifty percent (50%) of the applicant's regular billing rate, and reimbursement is subject to specific travel restrictions and limitations.¹⁵ The Receiver and his team follow the guidelines, which specify: 1) they seek the

¹¹ The Billing Instructions are available online at www.sec.gov/oiea/Article/billinginstructions.pdf.

¹² See, www.sec.gov/oiea/Article/billinginstructions.pdf.

¹³ *Id.*

¹⁴ *Id.*

¹⁵ *Id.*

1 and use the lowest airfare; 2) luxury accommodations and deluxe meals are not reimbursable;
2 3) personal and incidental charges are not included; and 4) expenses over \$75 require a receipt. In
3 regard to hotel selection, the Receiver books accommodations based on availability and costs, and
4 the Receiver and his team strive to find reasonable accommodations, taking into account fluctuating
5 prices due to conferences and events in Las Vegas.

6 Cognizant of the fees and expenses and the impact they can have on the Receivership Estate,
7 Mr. Winkler reviews both the invoices from his team of professionals and American Fiduciary
8 Services (“AFS”) on a monthly basis. In so doing, he looks to identify inefficiencies and cuts any
9 time entries and requests for reimbursement he believes are excessive or inconsistent with the
10 Billing Instructions and/or U.S. Trustee’s Guidelines. After Mr. Winkler’s review, the invoices are
11 sent directly to counsel for the SEC for their review and input under both the Billing Instructions
12 standards and counsel’s experience and discretion.

13 In regard to the fees and costs requested in the Fourteenth Quarterly Fee Applications, the
14 process outlined above was utilized with (1) the professionals responsible reviewing their own
15 invoices on a monthly basis, (2) the Receiver then reviewing the invoices on a monthly basis, and
16 (3) the Receiver then providing the same to counsel for the SEC for its review. The Receiver and
17 his professionals are sensitive to the feedback received from SEC staff. For the Fourteenth
18 Quarterly Fee Applications, the SEC did not have an opportunity to fully review the same due to
19 issues with the government shutdown. However, the SEC has indicated they have no objection to
20 the filing of the fee application and reserve the right to comment regarding the invoices and the
21 Receiver has agreed to make any necessary adjustments identified by the SEC in the next fee
22 application.

23 It is also important to note that, consistent with the billing guidelines of the SEC, the
24 Receiver and the applicable law firms are seeking payment of 80% of their fees with the remaining,
25 unpaid twenty percent (20%) as a “holdback” of approved fees, subject to final review and payment
26 only at the conclusion of this Receivership. This provides additional security, should the Court
27 have any additional concerns not addressed in the amended filings. Indeed, the 20% hold back
28 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 order¹⁶ 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 \$815,161.00 and costs of \$20,725.03;
- (2) Greenberg Traurig fees of \$52,661.78 and costs of \$823.16;
- (3) Aitheras fees of \$36,002.27;
- (4) Allen Matkins fees of \$93,370.50 and costs of \$1,514.43; and
- (5) SR Law fees of \$623.50.

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

DATED this 17th day of November, 2025.

GREENBERG TRAURIG, LLP

/s/ Kara B. Hendricks

KARA B. HENDRICKS

Nevada Bar No. 07743

KYLE A. EWING

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MALLORY & NATSIS LLP

Attorneys for Receiver Geoff Winkler

¹⁶ The form of the proposed order is attached as **Exhibit 1**.

CERTIFICATE OF SERVICE

Pursuant to Fed. R. Civ. P. 5(b), I hereby certify that on the 17th day of November, 2025, a true and correct copy of the foregoing **OMNIBUS MOTION TO APPROVE FOURTEENTH QUARTERLY APPLICATIONS FOR FEES AND REIMBURSEMENT OF EXPENSES FOR RECEIVER AND RECEIVER'S PROFESSIONALS FOR THE PERIOD FROM JULY 1, 2025, THROUGH SEPTEMBER 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

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LIST OF EXHIBITS

EXHIBIT	DESCRIPTION
Exhibit 1	[PROPOSED] ORDER

EXHIBIT 1

EXHIBIT 1

PROPOSED ORDER

KARA B. HENDRICKS, Bar No. 07743
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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

**[PROPOSED] ORDER GRANTING
OMNIBUS MOTION TO APPROVE
FOURTEENTH QUARTERLY
APPLICATIONS FOR FEES AND
REIMBURSEMENT OF EXPENSES
FOR RECEIVER AND RECEIVER'S
PROFESSIONALS FOR THE
PERIOD FROM JULY 1, 2025,
THROUGH SEPTEMBER 30, 2025**

The Court having reviewed the Omnibus Motion to Approve Fourteenth Quarterly Applications for Fees and Reimbursement of Expenses for Receiver and Receiver's Professionals for the Period from July 1, 2025, through September 30, 2025; the Fourteenth 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 July 1, 2025, Through September 30, 2025 (ECF No. 855); the Fourteenth 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. 852 (with declarations supporting, ECF Nos. 853, and 854)); 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 Fourteenth Quarterly Applications for Fees and Reimbursement of Expenses for Receiver and Receiver's Professionals for the Period from July 1, 2025, through September 30, 2025, is hereby GRANTED and:

- (1) Receiver fees of \$815,161.00 and costs of \$20,725.03 are allowed;
- (2) Greenberg Traurig fees of \$52,661.78 and costs of \$823.16 are allowed;
- (3) Aitheras fees of \$36,002.27 are allowed;
- (4) Allen Matkins fees of \$93,370.50 and costs of \$1,514.43 are allowed; and
- (5) Semenza Rickard Law fees of \$623.50 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 Semenza Rickard 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: _____