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12
13 **IN THE UNITED STATES DISTRICT COURT**
14 **FOR THE DISTRICT OF NEVADA**

15 SECURITIES AND EXCHANGE COMMISSION,
16
17 Plaintiff,
18 vs.
19 MATTHEW WADE BEASLEY, *et al.*,
20
21 Defendants,
22 THE JUDD IRREVOCABLE TRUST, *et al.*,
23
24 Relief Defendants.

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

**OMNIBUS MOTION TO APPROVE
FIFTEENTH QUARTERLY
APPLICATIONS FOR FEES AND
REIMBURSEMENT OF EXPENSES
FOR RECEIVER AND RECEIVER’S
PROFESSIONALS FOR THE
PERIOD OCTOBER 1, 2025,
THROUGH DECEMBER 31, 2025**

25 Geoff Winkler, the Court-appointed Receiver (the “Receiver”), submits this Omnibus
26 Motion to Approve Fifteenth Quarterly Applications for Fees and Reimbursement of Expenses for
27 Receiver and Receiver’s Professionals for the Period from October 1, 2025, through December 31,
28 2025 (“Motion”).

///

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1 This Motion is based on the below memorandum of points and authorities, the Fifteenth
2 Quarterly Application for Payment of Fees and Reimbursement of Expenses for Receiver and
3 Receiver’s Professionals Greenberg Traurig, LLP, and Aitheras, LLC, for the Period October 1,
4 2025, Through December 31, 2025 (ECF No. **874**) (“Fifteenth Quarterly Fee App, ECF No. **874**”),
5 Fifteenth Quarterly Application for Payment of Fees and Reimbursement of Expenses of Receiver’s
6 Counsel: (1) Allen Matkins Leck Gamble Mallory & Natsis, LLP; and (2) Semenza Rickard Law
7 (ECF No. **871** (with declarations supporting, ECF Nos. **872** and **873**) (“Fifteenth Quarterly Fee
8 App, ECF No. **871**”) (together, the “Fifteenth Quarterly Fee Applications”), filed concurrently
9 herewith, the pleadings and papers on file herein, and such other and further information as may be
10 presented to the Court at the time of any hearing.

11 DATED this 18th day of February 2026.

12 **GREENBERG TRAUIG, LLP**

13 */s/ Kara. Hendricks*

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25 **ALLEN MATKINS LECK GAMBLE**
26 **MALLORY & NATSIS LLP**

27 *Attorneys for Receiver Geoff Winkler*

28 **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 October 1, 2025, through December 31, 2025 (the “Application Period”). The Receiver and his counsel provided

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1 copies of billing entries to counsel for the Securities & Exchange Commission (“SEC”) and SEC
2 staff has reviewed and provided comments on the fee statements and does not oppose the interim
3 request 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 \$598,991.50 and costs of \$5,881.33;
- 20 (2) Greenberg Traurig fees of \$36,864.14 and costs of \$404.76;
- 21 (3) Aitheras fees of \$44,000.20;
- 22 (4) Allen Matkins fees of \$55,767.00 and costs of \$1,312.93; and
- 23 (5) SR Law fees of \$507.50.

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 Fifteenth Quarterly Status Report (ECF No. 868), and include substantial progress on critical
26 elements of the receivership, related to: continued communication with Defendants and counsel

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).

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1 following the completion of the substantive forensic accounting report (“Forensic Accounting”)
2 (ECF No. 792), to address Defendant specific questions and concerns; further analysis and
3 revisions relating to Defendant and investors accounts identified in the Forensic Accounting;
4 execution of the claims process and auditing of received claims; evaluation and assessment of
5 certain Defendant’s business assets; continued monitoring of the bankruptcy proceedings of Aaron
6 Grigsby to protect estate assets; evaluating third-party recovery potential; settlement discussions
7 and execution of settlement agreements with third parties; continued evaluation of electronically
8 stored documents; and preparation and filing of matters with the Court for the benefit of the
9 Receivership Estate.³ The Receiver’s highly successful efforts have resulted in the recovery or
10 anticipated recovery of assets, including cash, cryptocurrency, personal property, real properties
11 and other with an estimated gross value of more than \$185 million. This includes anticipated third-
12 party litigation recovery which Receiver anticipates will provide a substantial benefit to the estate.

13 Further specifics regarding the efforts of the Receiver and his team from American
14 Fiduciary Services (“AFS”) and Greenberg Traurig are detailed in the Fifteenth Quarterly Fee App,
15 ECF No. **874**. Additional details regarding the activities and services provided by Allen Matkins
16 Leck Gamble Mallory & Natsis, LLP and Semenza Rickard Law are set forth in their Fifteenth
17 Quarterly Fee App, ECF No. **871**.

18 **III. LEGAL AUTHORITY**

19 “The power of a district court to impose a receivership ... derives from the inherent power
20 of a court of equity to fashion effective relief.”⁴ “The primary purpose of equity receiverships is
21 to promote orderly and efficient administration of the Receivership Estate by the district court for
22 the benefit of creditors.”⁵ “[T]he practice in administering an estate by a receiver ... must accord
23 with the historical practice in federal courts or with a local rule.”⁶

24 As the Ninth Circuit explained:

25 _____
26 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.

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

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

⁶ Fed. R. Civ. P. 66.

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

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

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

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

23 **A. Efforts to Avoid Duplication.**

24 During the Application Period, the Receiver and his professionals endeavored to avoid
25 duplication of efforts, and to undertake required tasks in as efficient a manner as possible, utilizing
26 personnel best suited to the task. Among other things, the Receiver and select representatives
27

28 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).

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

6 As was the case in previous reporting periods, and by way of example, Allen Matkins
7 devoted efforts to obtain financial documents and other information critical to the Receiver's
8 administration of the Estate and forensic accounting, leading insurance recovery efforts, and
9 communication and evaluation of creditor claims, while Greenberg Traurig took the lead on
10 working with Defendants and their counsel, assisting with investor communications, continuing
11 efforts related to the claims process, and communicating with investors and counsel for Defendants,
12 facilitating settlement discussions with third parties and preparation of support documents and
13 assisted in asset recovery efforts, filing necessary motions with the court related to same.
14 Additionally, Greenberg Traurig has taken the lead on handling the continued issues related to
15 Aaron Grigsby. This division of work has significantly benefitted the estate, as reflected in the
16 Court’s prior favorable orders on the Receiver’s motions and stipulations filed for the sale and/or
17 turnover of property, motions relating to the turnover of attorney fees, and in the progress made by
18 the Receiver to-date in connection with the identification and marshaling of valuable receivership
19 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 Fifteenth Quarterly Status Report, and the Fifteenth 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

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1 assets, and enormous effort was made to continue verifying accounting figures, including newly
2 discovered information, during claims, third-party recovery, and damage review. This work
3 included, but was not limited to, obtaining additional bank and trust company records and cross
4 referencing materials, communication with numerous Defendants and communication with
5 investors.¹⁰ Certain of the numbers in the Forensic Accounting have evolved with the additional
6 data, as relayed in the Fifteenth Quarterly Status Report.

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

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

22 When it comes to evaluating the burden of the expenses and the ability of the receivership
23 estate to reasonably bear the same, it is important to look at the case as a whole. In its Complaint
24 (as amended), the SEC has alleged causes of action arising from an alleged investment scheme,
25 whereby hundreds of millions of dollars in investments were successfully solicited based on claims
26 that funds invested would be backed by settlements to be paid out in litigation across the country.

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

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

12 **D. Communication with SEC Counsel.**

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

17 For this reporting period, invoices were provided to SEC staff for review. The SEC has
18 indicated they do not oppose the filing of this motion or approval of the payment requested on an
19 interim basis.

20 In addition to discounting rates for this matter and following their own firm best practices
21 for ethical and commercially reasonable billing, the Receiver and his counsel work to ensure that
22 all billing standards meet or exceed both (i) the SEC’s Billing Instructions for Receivers in Civil
23 Actions Commenced by the U.S. Securities and Exchange Commission (the “Billing Instructions”) and
24 (ii) the U.S. Trustee’s Guidelines for Reviewing Applications for Compensation and
25 Reimbursement of Expenses.¹¹ The Billing Instructions and Trustee’s Guidelines have been
26 developed iteratively by the SEC and U.S. Trustee specifically to ensure that receivers, trustees,
27 and any professionals or others employed by them charge only reasonable and necessary fees and

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

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1 expenses to a receivership or bankruptcy estate.

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

11 Further, consistent with SEC guidelines, only certain types of costs are included in the
12 invoices submitted. Allowed expenses per SEC guidelines include filing fees, process service fees,
13 expert witness fees, court reporter fees, lines and title expense, postage, parking, and travel.¹⁴ SEC
14 guidelines also allow for reimbursement for photocopying and telephone charges. However, such
15 photocopying and telephone expenses are already voluntarily excluded from the invoices and
16 applications submitted in this case.

17 When it comes to travel, the Receiver and his team are also limited in what they can seek
18 reimbursement for and are cost conscious. Notably, per SEC guidelines, long distance travel
19 outside a twenty (20) mile radius of the applicant's office is reimbursable at fifty percent (50%) of
20 the applicant's regular billing rate, and reimbursement is subject to specific travel restrictions and
21 limitations.¹⁵ The Receiver and his team follow the guidelines, which specify: 1) they seek the
22 and use the lowest airfare; 2) luxury accommodations and deluxe meals are not reimbursable;
23 3) personal and incidental charges are not included; and 4) expenses over \$75 require a receipt. In
24 regard to hotel selection, the Receiver books accommodations based on availability and costs, and
25 the Receiver and his team strive to find reasonable accommodations, taking into account fluctuating

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

27 ¹³ *Id.*

28 ¹⁴ *Id.*

¹⁵ *Id.*

1 prices due to conferences and events in Las Vegas.

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

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

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

24 V. CONCLUSION

25 Based on the foregoing, the Receiver and his counsel request that the Court approve the
26 fees and expenses as noted herein, and also authorize the payment of those fees and expenses on a
27 percentage, interim basis. Specifically, the Receiver and his counsel request entry of an order¹⁶

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

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1 Granting this Omnibus Motion in its entirety and approving the following fees and costs incurred
2 for this Application Period as follows:

- 3 (1) Receiver fees of \$598,991.50 and costs of \$5,881.33;
- 4 (2) Greenberg Traurig fees of \$36,864.14 and costs of \$404.76;
- 5 (3) Aitheras fees of \$44,000.20;
- 6 (4) Allen Matkins fees of \$55,767.00 and costs of \$1312.93; and
- 7 (5) SR Law fees of \$507.50.

8 The Receiver respectfully requests the Court’s interim approval of 100% of the fees and
9 expenses incurred during the Application Period and further requests the interim payment of
10 (1) 80% of the fees and 100% of the expenses incurred by the Receiver and the Receiver’s Counsel;
11 and (2) 100% of the fees incurred by Aitheras. The Receiver further requests any other and further
12 relief as the Court deems just and appropriate.

13 DATED this 18th day of February 2026.

14 **GREENBERG TRAUIG, LLP**

15 */s/ Kara B. Hendricks*

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23 **ALLEN MATKINS LECK GAMBLE**
MALLORY & NATSIS LLP
Attorneys for Receiver Geoff Winkler

CERTIFICATE OF SERVICE

Pursuant to Fed. R. Civ. P. 5(b), I hereby certify that on the **18th day of February, 2026**, a true and correct copy of the foregoing **OMNIBUS MOTION TO APPROVE FIFTEENTH QUARTERLY APPLICATIONS FOR FEES AND REIMBURSEMENT OF EXPENSES FOR RECEIVER AND RECEIVER’S PROFESSIONALS FOR THE PERIOD FROM OCTOBER 1, 2025, THROUGH DECEMBER 31, 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 TRAUIG, LLP

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LIST OF EXHIBITS

EXHIBIT	DESCRIPTION
Exhibit 1	[PROPOSED] ORDER

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EXHIBIT 1

EXHIBIT 1

PROPOSED ORDER

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12
13 **IN THE UNITED STATES DISTRICT COURT**
14 **FOR THE DISTRICT OF NEVADA**

15 SECURITIES AND EXCHANGE COMMISSION,
16 Plaintiff,
17 vs.
18 MATTHEW WADE BEASLEY, *et al.*,
19 Defendants,
20 THE JUDD IRREVOCABLE TRUST, *et al.*,
21 Relief Defendants.

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

**[PROPOSED] ORDER GRANTING
OMNIBUS MOTION TO APPROVE
FIFTEENTH QUARTERLY
APPLICATIONS FOR FEES AND
REIMBURSEMENT OF EXPENSES
FOR RECEIVER AND RECEIVER’S
PROFESSIONALS FOR THE
PERIOD FROM OCTOBER 1, 2025,
THROUGH DECEMBER 31, 2025**

22
23 The Court having reviewed the Omnibus Motion to Approve Fifteenth Quarterly
24 Applications for Fees and Reimbursement of Expenses for Receiver and Receiver’s Professionals
25 for the Period from October 1, 2025, through December 31, 2025; the Fifteenth Quarterly
26 Application for Payment of Fees and Reimbursement of Expenses for Receiver and Receiver’s
27 Professionals Greenberg Traurig, LLP, and Aitheras, LLC, for the Period October 1, 2025, Through
28 December 31, 2025 (ECF No. **874**); the Fifteenth Quarterly Application for Payment of Fees and

1 Reimbursement of Expenses of Receiver’s Counsel: (1) Allen Matkins Leck Gamble Mallory &
2 Natsis, LLP; and (2) Semenza Rickard Law (ECF No. 871 (with declarations supporting, ECF
3 Nos. 872, and 873)); and the Court having found that notice was proper and that good cause exists
4 to approve the same,

5 **IT IS HEREBY ORDERED, ADJUDGED AND DECREED THAT** the Omnibus
6 Motion to Approve Fifteenth Quarterly Applications for Fees and Reimbursement of Expenses for
7 Receiver and Receiver’s Professionals for the Period from October 1, 2025, through December 31,
8 2025, is hereby GRANTED and:

- 9 (1) Receiver fees of \$598,991.50 and costs of \$5,881.33 are allowed;
- 10 (2) Greenberg Traurig fees of \$36,864.14 and costs of \$404.76 are allowed;
- 11 (3) Aitheras fees of \$44,000.20 are allowed;
- 12 (4) Allen Matkins fees of \$55,767.00 and costs of \$1,312.93 are allowed; and
- 13 (5) Semenza Rickard Law fees of \$507.50 are allowed.

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

18 **IT IS SO ORDERED.**

19
20 _____
UNITED STATES DISTRICT COURT JUDGE

21 Dated: _____
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