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8
 9 **UNITED STATES DISTRICT COURT**

10 **DISTRICT OF NEVADA**

11 SECURITIES AND EXCHANGE
 12 COMMISSION,
 13 Plaintiff,
 14 v.
 15 CAPSOURCE, INC., STEPHEN J. BYRNE,
 and GREGORY P. HERLEAN
 16 Defendants.

17 Case No. 2:20-cv-02303-RFB-DJA

**NOTICE OF NON-OPPOSITION TO
 RECEIVER'S THIRTEENTH
 QUARTERLY APPLICATION FOR
 PAYMENT OF FEES AND
 REIMBURSEMENT OF EXPENSES OF
 RECEIVER AND RECEIVER'S
 COUNSEL GREENBERG TRAURIG
 FOR PERIOD JULY 1, 2025, THROUGH
 SEPTEMBER 30, 2025 (ECF No. 119)**

18 Geoff Winkler, the Court-appointed Receiver ("Receiver"), by and through his counsel of
 19 record, the law firm of Greenberg Traurig, LLP, hereby submits the following Notice of Non-
 20 Opposition to the Receiver's Thirteenth Quarterly Application for Fees and Reimbursement of
 21 Expenses of Receiver and Receiver's Counsel Greenberg Traurig for Period July 1, 2025, through
 22 September 30, 2025 (ECF No. 119) (the "Thirteenth Application").

23 The Thirteenth Application was filed on November 25, 2025 and any response in
 24 opposition thereto was due by December 9, 2025, pursuant to Local Rule 7-2(b). No party has
 25 timely filed a response in opposition to the Thirteenth Application and the deadline to do so has
 26 passed. Pursuant to Local Rule 7-2(d) "[t]he failure of an opposing party to file points and
 27 authorities in response to any motion, except a motion under Fed. R. Civ. P. 56 or a motion for
 28 attorney's fees, constitutes a consent to the granting of the motion."

In light of the foregoing and in consideration of the substantive points and legal authorities more fully set forth in the Thirteenth Application, the Receiver respectfully requests the same be granted. A proposed order regarding the same is attached as Exhibit 3 to ECF No. 119.

Respectfully submitted this 10th day of December 2025.

GREENBERG TRAURIG, LLP

18/ Kara B. Hendricks

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CERTIFICATE OF SERVICE

I hereby certify that, on the **10th of December 2025**, a true and correct copy of the foregoing **NOTICE OF NON-OPPOSITION TO RECEIVER'S THIRTEENTH QUARTERLY APPLICATION FOR PAYMENT OF FEES AND REIMBURSEMENT OF EXPENSES OF RECEIVER AND RECEIVER'S COUNSEL GREENBERG TRAURIG FOR PERIOD JULY 1, 2025, THROUGH SEPTEMBER 30, 2025 (ECF NO. 119)** was filed electronically via the Court's CM/ECF system. Notice of filing will be served on all parties 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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