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7 *Attorneys for Receiver Geoff Winkler*

8 **UNITED STATES DISTRICT COURT**

9 **DISTRICT OF NEVADA**

10 SECURITIES AND EXCHANGE
11 COMMISSION,

12 Plaintiff,

13 vs.

14 CAPSOURCE, INC., *et al.*

15 Defendants.

Case No. 2:20-CV-02303-RFB-DJA

**SUPPLEMENT TO FIRST
QUARTERLY APPLICATION FOR
PAYMENT OF FEES AND
REIMBURSEMENT OF EXPENSES
OF RECEIVER AND RECEIVER'S
COUNSEL GREENBERG TRAUIG**

16
17 Comes now, Geoff Winkler, the Court-appointed Receiver (the "Receiver"), by and
18 through his counsel of record the law firm of Greenberg Traurig, LLP, and hereby submits this
19 Supplement to the First Quarterly Application for Payment of Fees and Reimbursement of
20 Expenses of Receiver and Receiver's counsel Greenberg Traurig, LLP ("Application") for the
21 period of August 26, 2022 through September 30, 2022 (ECF No. 23).

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1 At the Court’s request and pursuant to Local Rule 66-6, attached hereto as **Exhibit C**,
2 is a supplemental declaration of Geoff Winkler affirming he has not entered into any
3 agreement, written or oral, express or implied, with any other person concerning the amount
4 of compensation paid or to be paid from the assets of the estate, or any sharing of it.

5 DATED this 23rd day of February 2023.

6 **GREENBERG TRAUIG, LLP**

7 By: */s/ Kara B. Hendricks*

8 KARA B. HENDRICKS

9 Nevada Bar No. 7743

10 KYLE A. EWING

11 Nevada Bar No. 14051

12 CHRISTIAN T. SPAULDING

13 Nevada Bar No. 14277

14 10845 Griffith Peak Drive, Suite 600

15 Las Vegas, Nevada 89135

16 *Attorneys for Receiver Geoff Winkler*

CERTIFICATE OF SERVICE

I hereby certify that, on the 23rd day of February, 2023, a true and correct copy of the foregoing **SUPPLEMENT TO FIRST QUARTERLY APPLICATION FOR PAYMENT OF FEES AND REIMBURSEMENT OF EXPENSES OF RECEIVER AND RECEIVER'S COUNSEL GREENBERG TRAUIG** 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 TRAUIG, LLP

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LIST OF EXHIBITS

| EXHIBIT | DESCRIPTION |
|----------------|---|
| Exhibit C | Supplemental Declaration of Geoff Winkler |

Greenberg Traurig, LLP
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Telephone: (702) 792-3773 / Facsimile (702) 792-9002

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EXHIBIT C

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Supplemental Declaration of Geoff Winkler

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8 **UNITED STATES DISTRICT COURT**
9 **DISTRICT OF NEVADA**

10 SECURITIES AND EXCHANGE
11 COMMISSION,

12 Plaintiff,

13 vs.

14 CAPSOURCE, INC., *et al.*

15 Defendants.

Case No. 2:20-CV-02303-RFB-DJA

**SUPPLEMENTAL DECLARATION OF
GEOFF WINKLER IN SUPPORT OF
FIRST QUARTERLY APPLICATION
FOR PAYMENT OF FEES AND
REIMBURSEMENT OF EXPENSES OF
RECEIVER AND RECEIVER’S
COUNSEL GREENBERG TRAUIG**

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17 I, Geoff Winkler, hereby declare as follows:

18 1. I am over 21 years old and am a founding member and the chief executive officer
19 of American Fiduciary Services LLC (“AFS”), which is based in Portland, Oregon.

20 2. I am competent to testify to the matters presented in this declaration, and I submit
21 this supplemental declaration in support of my application for approval of the first quarter fees and
22 costs of my firm and my professional in connection with CapSource, Inc. (“CapSource”). This
23 declaration is based on my personal knowledge.

24 3. I hereby certify that I have read the First Quarterly Application for Payment of Fees
25 and Reimbursement of Expenses of Receiver and Receiver’s Counsel Greenberg Traurig for the
26 Period from August 26, 2022 through September 30, 2022.

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4. I further certify that I have not entered into any agreement, written or oral, express or implied, with any other person concerning the amount of compensation paid or to be paid from the assets of the estate, or any sharing of it.

I declare under penalty of perjury under the laws of the State of Nevada that the foregoing is true and correct.

Executed on February 23, 2023.

/s/ Geoff Winkler
GEOFF WINKLER
Declarant

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