

KARA B. HENDRICKS, ESQ.  
Nevada Bar No. 07743  
hendricksk@gtlaw.com  
KYLE A. EWING, ESQ.  
Nevada Bar No. 14051  
ewingk@gtlaw.com  
**GREENBERG TRAUIG, LLP**  
10845 Griffith Peak Drive, Suite 600  
Las Vegas, Nevada 89135  
Telephone: (702) 792-3773  
Facsimile: (702) 792-9002  
*Attorneys for Receiver Geoff Winkler*

**UNITED STATES DISTRICT COURT**  
**DISTRICT OF NEVADA**

SECURITIES AND EXCHANGE  
COMMISSION,

Plaintiff,

v.

CAPSOURCE, INC., STEPHEN J. BYRNE,  
and GREGORY P. HERLEAN

Defendants.

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

**NOTICE OF NON-OPPOSITION TO  
RECEIVER'S ELEVENTH  
QUARTERLY APPLICATION FOR  
PAYMENT OF FEES AND  
REIMBURSEMENT OF EXPENSES  
OF RECEIVER AND RECEIVER'S  
COUNSEL GREENBERG TRAUIG  
FOR PERIOD JANUARY 1, 2025,  
THROUGH MARCH 31, 2025**

Geoff Winkler, the Court-appointed Receiver ("Receiver"), by and through his counsel of record, the law firm of Greenberg Traurig, LLP, hereby submits the following Notice of Non-Opposition to the Receiver's Eleventh Quarterly Application for Fees and Reimbursement of Expenses of Receiver and Receiver's Counsel Greenberg Traurig for Period January 1, 2025, through March 31, 2025 (ECF No. 108) (the "11<sup>th</sup> Quarterly Fee Application").

The 11<sup>th</sup> Quarterly Fee Application was filed on May 15, 2024, and any response in opposition thereto was due by May 29, 2025, pursuant to Local Rule 7-2(b). No party has timely filed a response in opposition to the 11<sup>th</sup> Quarterly Fee Application and the deadline to do so has passed. Pursuant to Local Rule 7-2(d) "[t]he failure of an opposing party to file points and authorities in response to any motion, except a motion under Fed. R. Civ. P. 56 or a motion

1 for attorney's fees, constitutes a consent to the granting of the motion."

2 In light of the forgoing and in consideration of the substantive points and legal authorities  
3 more fully set forth in the 11<sup>th</sup> Quarterly Fee Application, the Receiver respectfully requests the  
4 same be granted. A proposed order regarding the same is attached to ECF No. 108.

5 Respectfully submitted this 9<sup>th</sup> day of June 2025.

6 **GREENBERG TRAURIG, LLP**

7 */s/ Kara B. Hendricks*

8 KARA B. HENDRICKS, ESQ.

9 Nevada Bar No. 07743

10 KYLE A. EWING, ESQ.

11 Nevada Bar No. 14051

12 *Attorneys for Receiver Geoff Winkler*

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GREENBERG TRAURIG, LLP  
10845 GRIFFITH PEAK DRIVE SUITE 600, LAS VEGAS, NEVADA 89135  
TELEPHONE: (702) 938-6856

**CERTIFICATE OF SERVICE**

I hereby certify that, on the **9<sup>th</sup> day of June 2025**, a true and correct copy of the foregoing **NOTICE OF NON-OPPOSITION TO RECEIVER'S ELEVENTH QUARTERLY APPLICATION FOR PAYMENT OF FEES AND REIMBURSEMENT OF EXPENSES OF RECEIVER AND RECEIVER'S COUNSEL GREENBERG TRAURIG FOR PERIOD JAN 1, 2025, THROUGH MARCH 31, 2025** 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