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Attorneys for Receiver Geoff Winkler

9 **UNITED STATES DISTRICT COURT**

10 **DISTRICT OF NEVADA**

11 SECURITIES AND EXCHANGE
COMMISSION,

12 Plaintiff,

13 v.

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

16 Defendants.

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

**NOTICE OF NON-OPPOSITION TO
RECEIVER'S FOURTEENTH
QUARTERLY APPLICATION FOR
PAYMENT OF FEES AND
REIMBURSEMENT OF EXPENSES OF
RECEIVER AND RECEIVER'S
COUNSEL GREENBERG TRAUIG
FOR PERIOD OCTOBER 1, 2025,
THROUGH DECEMBER 31, 2025 (ECF
NO. 124)**

18
19 Geoff Winkler, the Court-appointed Receiver ("Receiver"), by and through his counsel of
20 record, the law firm of Greenberg Traurig, LLP, hereby submits the following Notice of Non-
21 Opposition to the Receiver's Fourteenth Quarterly Application for Fees and Reimbursement of
22 Expenses of Receiver and Receiver's Counsel Greenberg Traurig for Period October 1,
23 2025, through December 31, 2025 (ECF No. 124) (the "Fourteenth Application").

24 The Fourteenth Application was filed on February 17, 2025, and any response in
25 opposition thereto was due by March 3, 2026, pursuant to Local Rule 7- 2(b). No party has timely
26 filed a response in opposition to the Fourteenth Application and the deadline to do so has passed.
27 Pursuant to Local Rule 7-2(d) "[t]he failure of an opposing party to file points and authorities in
28 response to any motion, except a motion under Fed. R. Civ. P. 56 or a motion for attorney's fees,

1 constitutes a consent to the granting of the motion.”

2 In light of the foregoing and in consideration of the substantive points and legal authorities
3 more fully set forth in the Fourteenth Application, the Receiver respectfully requests the same be
4 granted. A proposed order regarding the same is attached as Exhibit 3 to ECF No. 124.

5 Respectfully submitted this 9th day of March 2026.

6 **GREENBERG TRAURIG, LLP**

7 */s/ Kara B. Hendricks*

8 KARA B. HENDRICKS, ESQ.

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12 *Attorneys for Receiver Geoff Winkler*

CERTIFICATE OF SERVICE

I hereby certify that, on the 9th of March 2026, a true and correct copy of the foregoing **NOTICE OF NON-OPPOSITION TO RECEIVER'S FOURTEENTH QUARTERLY APPLICATION FOR PAYMENT OF FEES AND REIMBURSEMENT OF EXPENSES OF RECEIVER AND RECEIVER'S COUNSEL GREENBERG TRAURIG FOR PERIOD OCTOBER 1, 2025, THROUGH DECEMBER 31, 2025 (ECF NO. 124)** 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