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**DISTRICT COURT**

**CLARK COUNTY, NEVADA**

NUVEDA, LLC, a Nevada Limited Liability  
Company; and CWNEVADA LLC, a Nevada  
Limited Liability Company,

Plaintiffs,

v.

4FRONT ADVISORS LLC, foreign limited  
liability company, DOES I through X and ROE  
ENTITIES, II through XX, inclusive,

Defendants.

Case No.: A-17-755479-B

Dept. No.: ● X1

**HEARING REQUESTED**

**RENEWED MOTION TO APPROVE CLAIMS PROCESS**  
**ON ORDER SHORTENING TIME**

Dotan Y. Melech, the Court-appointed receiver over CWNevada, LLC (“CWNevada”) in this matter (“Receiver”), by and through his undersigned counsel of record, hereby files this Renewed Motion to Approve Claims Process (“Renewed Claims Motion”). The Receiver previously filed a Motion for Order Establishing Bar Date and Related Procedures for Filing Proofs of Claim and Approving the Form and the Manner of Notice Thereof on Order Shortening Time (“First Claims Procedure Motion”) on September 12, 2019. The Court denied the First Claims Procedure Motion without prejudice on November 25, 2019 primarily because the Court viewed it to be too limited in scope and wanted more detail regarding the claim evaluation process and the procedure for objecting to and resolving any disputed claims.

1 This Renewed Claims Motion expands on the scope of the First Claims Procedure Motion  
2 by including an explanation regarding the process for evaluating the claims (“Evaluation Process”)  
3 and the procedure for resolving any disputes as to such determinations (“Objection Process”).

4 The Receiver is authorized to take the requested action pursuant to the Order Appointing  
5 Receiver entered on July 10, 2019 (the “Receivership Order”), which granted the Receiver the  
6 power and authority to, *inter alia*, “compromise debts of the Receivership Estate...terminate or  
7 reject any contracts or agreements relating to the Receivership Estate...approve the Receivership  
8 Estate’s expenses, payments, transfers, withdrawals, and distributions (collectively ‘Payments’) to  
9 ensure that all such Payments are proper and made in the ordinary course of business.”  
10 Additionally, except as expressly limited by the Receivership Order, the Court granted the  
11 Receiver “all powers given to an equity receiver, provided by N.R.S. Chapter 32 and/or common  
12 law.”


13 A proposed order granting the Motion (“Order”) is attached hereto as **Exhibit “1”**, the  
14 proposed notice of bar date form is attached to the Order as **Exhibit “A”**, the proposed proof of  
15 claim form is attached to the Order as **Exhibit “B”** for claimants to submit their claims, and the  
16 proposed notice of Creditor Objection Form is attached to the Order as **Exhibit “C”** for claimants  
17 to object to any full or partial denial of claims.

18 The Receiver is asking for the Renewed Claims Motion to be heard on shortened time  
19 because the State of Nevada Department of Taxation (the “State”) and other creditors have  
20 repeatedly asked the Receiver to provide a complete list of CWNevada’s creditors and alleged  
21 claims, which the Receiver cannot provide until the Receiver has completed the claims process.  
22 The Receiver wants to comply with to the State’s request and the request of other creditors, as  
23 soon as possible. Moreover, at the last hearing, the Court advised that it would set the Renewed  
24 Claims Motion on shortened time.

25 The Renewed Claims Motion is made and based on the papers and pleadings on file herein,  
26 the Receivership Order, the Declaration of Dotan Y. Melech (the “Receiver Declaration”), attached  
27 hereto as **Exhibit “2”**; the Declaration of Richard H. Holley, Esq. (the “Holley Declaration”), and  
28 any additional exhibits attached hereto, and any oral argument that may be heard.

Dated this 13<sup>th</sup> day of December 2019.

**HOLLEY DRIGGS WALCH  
FINE PUZEY STEIN & THOMPSON**

  
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*Attorneys for Dotan Y. Melech, Receiver*

**DECLARATION OF RICHARD F. HOLLEY, ESQ. IN SUPPORT OF THE RENEWED  
MOTION TO APPROVE CLAIMS PROCESS ON ORDER SHORTENING TIME**

I, Richard F. Holley, Esq., declare as follows:

1. I am a shareholder with the law firm Holley Driggs Walch Fine Puzey Stein & Thompson, counsel for the Receiver in the above-captioned case.
2. I have personal knowledge of the matters set forth herein, with the exception of those stated to be made upon information and belief, and as to those I believe them to be true to the best of my knowledge. If called to do so, I could and would testify competently to the matters set forth herein.
3. I make this declaration in support of the Receiver's Renewed Claims Motion.
4. The Receiver is asking for the Renewed Claims Motion to be heard on shortened time because the State and other creditors have repeatedly asked the Receiver to provide the total amount of claims outstanding against CWNevada and the complete list of CWNevad's creditors, which the Receiver cannot provide until the Receiver has completed the claims process.
5. The Receiver wants to comply with to the State's request and the request of other creditors, as soon as possible. In addition, at the hearing on the original claims motion the Court stated that it would hear the Renewed Claims Motion on shortened time.
6. On November 25, 2019, the Court heard oral argument on the First Claims Procedure Motion and denied the same without prejudice. The Court's primary reasons for denying the First Claims Procedure Motion was that it viewed the First Claims Procedure Motion

to be too limited in scope and wanted an explanation regarding the process for evaluating claims and the procedure for objecting to and resolving any disputes as to objected claims. This Renewed Claims Motion expands on the scope of the First Claims Procedure Motion by including an explanation regarding Evaluation Process and the Objection Process. The Evaluation Process and the Objection Process are modeled after the proof of claim process in bankruptcy, which is a tried and true standard for dealing with filing proofs of claim, objecting to proofs of claim and resolving contested proofs of claim.

7. It is respectfully submitted that the above and foregoing establishes good cause to grant the Order Shortening Time on the Receiver's Renewed Claims Motion.

8. I declare under penalty of perjury that the foregoing is true and correct.

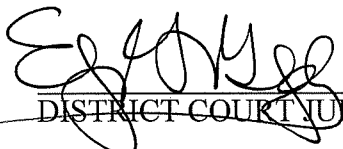
Dated this 13<sup>th</sup> day of December, 2019.

  
RICHARD F. HOLLEY, ESQ.

**ORDER SHORTENING TIME**


IT IS HEREBY ORDERED that upon review of the Receiver's request for an Order Shortening Time and good cause appearing therefor, **RENEWED MOTION TO APPROVE CLAIMS PROCESS ON ORDER SHORTENING TIME** shall be heard on the 30 day of Dec, 2019, at 9:00 a.m./p.m. in Department XI of the above entitled court.

**IT IS SO ORDERED.**

  
DISTRICT COURT JUDGE

Respectfully submitted by:

**HOLLEY DRIGGS WALCH  
FINE PUZEY STEIN & THOMPSON**

  
RICHARD F. HOLLEY, ESQ. (NBN 3077)  
JOHN J. SAVAGE, ESQ. (NBN 11455)  
400 South Fourth Street, Third Floor  
Las Vegas, Nevada 89101  
*Attorneys for Dotan Y. Melech, Receiver*

**MEMORANDUM OF POINTS AND AUTHORITIES**

**I. STATEMENT OF FACTS**

**A. The Receivership Order.**

1. The Court appointed the Receiver over CWNevada and all of its assets including, without limitation, all assets and rights related to any subsidiary and affiliated entities in which CWNevada has an ownership interest. *See* Receivership Order, on file herein, at 1:27 – 2:8.

2. Except as expressly limited by the Receivership Order, the Court granted the Receiver “all powers given to an equity receiver, provided by N.R.S. Chapter 32 and/or common law.” *Id.* at §32, 17:22-23.

3. The Receivership Order also granted the Receiver the power and authority to “compromise debts of the Receivership Estate<sup>1</sup>...terminate or reject any contracts or agreements relating to the Receivership Estate<sup>2</sup>...approve the Receivership Estate’s expenses, payments, transfers, withdrawals, and distributions (collectively ‘Payments’) to ensure that all such Payments are proper and made in the ordinary course of business.”<sup>3</sup>

4. Moreover, the Receiver is “authorized to determine, in its discretion, how best to use, operate, manage, control, market and sell the Receivership Estate, so long as any sale of the Receivership Estate outside of CWNevada’s normal course of business must be approved by the Court.” *Id.* at §9(d), 7:3-6.

**B. Requests for Creditor and Claim Information**

5. The State and other creditors have repeatedly asked the Receiver to provide the total amount of claims outstanding against CWNevada and the complete list of CWNevada’s creditors. *See* Receiver’s Declaration at ¶ 4.

6. The Receiver cannot comply with State’s request, or the request by other creditors until the Receiver has completed the claims process. *Id.* at ¶ 5.

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<sup>1</sup> *See* Receivership Order, on file herein, at §9(e), 7:7-9.

<sup>2</sup> *Id.* at §9(f), 7:16-18.

<sup>3</sup> *Id.* at §9(g), 7:23-26.

**C. The Claims' Submission Process**

7. Based on the information available at this time, the Receiver estimates there will likely be over one hundred (100) creditors of CWNevada with claims totaling approximately fifty-million dollars (\$50,000,000.00). *Id.* at ¶ 6.

8. As of the date of this Renewed Claims Motion, the Receiver is in the process of preserving, maintaining and protecting the Receivership Estate, investigating the creditors of the Receivership Estate, and the alleged claims of and against the Receivership Estate in order to administer the Receivership Estate as expeditiously and cost effectively as possible. *Id.* at ¶ 7.

9. To ensure that the creditors of the Receivership Estate are placed on notice and provide timely support of their respective claims in an orderly fashion to allow the Receiver to ascertain the creditor pool against the Receivership Estate, and to inform creditors regarding the claims' Evaluation Process and the claims' Objection Process, the Receiver brings this Motion for approval of the Receiver's proposed:

- a. proof of claim bar date;
- b. procedures for filing proofs of claim;
- c. form and manner of notice of bar date to all creditors;
- d. Evaluation Process; and
- e. Objection Process.

*Id.* at ¶ 8.

**D. First Claims Procedure Motion**

10. The Receiver filed his First Claims Procedure Motion on September 12, 2019. *See* First Claims Procedure Motion, on file herein. The First Claims Procedure Motion was originally set to be heard on October 8, 2019.

11. On September 20, 2019, NuVeda, LLC ("NuVeda") filed a limited opposition to the Receiver's First Claims Procedure Motion ("NuVeda Limited Opposition") and a very limited Countermotion for Related Relief ("NuVeda Countermotion"). *See* NuVeda Limited Opposition, on file herein.

12. On September 20, 2019, the plaintiffs in case number A792575 also filed a limited opposition to the Receiver's First Claims Procedure Motion ("Navarrete Limited Opposition"). See Navarrete Limited Opposition, on file herein.

13. On September 30, 2019, the Receiver filed his Reply in Support of First Claims Procedure Motion. See Reply in Support of First Claims Procedure Motion, on file herein.

14. However, Department 32 recused itself per its minute order dated October 4, 2019 and thereby vacated the October 8, 2019 hearing. See Minute Order, dated October 4, 2019, on file herein.

15. On November 25, 2019, the Court heard oral argument on the First Claims Procedure Motion and denied the same without prejudice. See Order Denying First Claims Procedure Motion, on file herein. The Court's primary reasons for denying the First Claims Procedure Motion was that it viewed the First Claims Procedure Motion to be too limited in scope and wanted an explanation for evaluating claims and the procedure for objecting to and resolving any disputes as to objected claims. See Holley Declaration at ¶ 6.

## II. LEGAL ARGUMENT

The Receiver seeks the entry of an order from this Court fixing the time within which proofs of claim or interest are to be filed in the above-captioned case as it relates to the Receivership Estate. This Court has authority to approve the Receiver's proposed claims process to assist the Receiver in carrying out its duties as set forth in greater detail in the Receivership Order. The Receiver anticipates that the pool of claims against the Receivership Estate will be large and comprised of a wide variety of claims. The Receiver is informed and believes that there are over one hundred (100) creditors of CWNevada who are believed to have cumulative claims of approximately fifty-million dollars (\$50,000,000.00).

Establishing a bar date for filing proofs of claim and related claim procedures will allow the Receiver to identify the universe of claims asserted against the Receivership Estate in furtherance of both an efficient claims reconciliation process and the Receiver's expeditious administration of the Receivership Estate. This Renewed Claims Motion expands on the scope of the First Claims Procedure Motion by including an explanation of the Evaluation Process and the

Objection Process, as well as previewing the Receiver's preliminary plan for the distribution process, which will be subject to further approval of the Court in a future motion. Throughout the claims process, the Receiver will continue to preserve, maintain and protect the Receivership Estate.

Accordingly, the Receiver respectfully requests that this Court enter the Order attached hereto as **Exhibit "1"**, establishing deadlines and procedures for filing proofs of claim as follows:

**A. Setting Bar Dates**

1. The Receiver respectfully requests the Court to establish the deadline to file a proof of claim for all persons and entities holding or wishing to assert a claim against CWNevada as sixty (60) days from the notice of entry of the Order attached hereto as **Exhibit "1"** (the "General Bar Date").

**B. Approving Form and Manner of Notice of Bar Dates**

1. The Receiver respectfully requests the Court to approve the form and manner of notice to creditors and parties-in-interest of the General Bar Date (the "Bar Date Notice") attached as **Exhibit "A"** to the Order; and

2. The Receiver respectfully requests the Court to approve the proposed proof of claim form (the "Proof of Claim Form") attached as **Exhibit "B"** to the Order.

**C. Form and Manner of Notice of Bar Dates:**

1. The Receiver proposes to give to all known creditors and parties-in-interest notice of the Bar Date, substantially in the form of the Bar Date Notice attached as **Exhibit "A"**, by first class mail by no later than seven (7) business days after the notice of entry of the Order attached hereto as **Exhibit "1"** is filed. The Receiver will include a Proof of Claim Form with the Bar Date Notice, which will be similar in form to, and substantially conform with the attached Proof of Claim Form attached as **Exhibit "B"** to the Order. The Bar Date Notice will:

- a. Inform creditors whether they are eligible to file a proof of claim and if they must file a proof of claim;
- b. Inform such creditors of the consequences of failing to timely file a proof of claim;
- c. Specify the form to be used in filing a proof of claim;
- d. Set forth the General Bar Date;



- e. Set forth the address to which proofs of claim must be sent for filing to the Receiver; and
- f. Notify creditors that a proof of claim must be submitted to the Receiver in the above-captioned case by the General Bar Date with original signatures (and not by facsimile or email pdf).

2. The Receiver submits that the Bar Date Notice will provide creditors with sufficient information and time to file a properly prepared and executed proof of claim.

3. The Receiver also proposes to publish notice of the General Bar Date substantially in the form of the Bar Date Notice, in the *Las Vegas Review Journal* by no later than seven (7) business days after the notice of entry of the Order attached hereto as **Exhibit "1"** is filed. The Receiver believes that publication of the notice in the *Las Vegas Review Journal* is appropriate and reasonably calculated to provide the widest practical notice to creditors of the Receivership Estate and parties-in-interest because it is a publication of general circulation in Clark County and most likely to provide effective notice to those not already participating in the Receivership. Moreover, substantially all of CWNevada's assets and operations are located in Southern Nevada. The publication shall occur once a week for three (3) consecutive weeks during the notice period.

4. The Receiver contends that the General Bar Date applies to all persons or entities holding or wishing to assert a claim against, or interest in CWNevada, including, but not limited to, any person or entity that has a disputed, contingent or unliquidated claim.

**D. Procedures for Submitting Proof of Claim Form**

1. The Receiver proposes that each person or entity asserting any claim against, or interest in, CWNevada be required to submit their claims ("Proof of Claim") as follows ("Approved Submission Procedure"):

- a. Submit an original, fully executed claim using the Proof of Claim Form,
- b. Attach documents supporting or evidencing the claim,
- c. Deliver the Proof of Claim to the Receiver either by mail, messenger, overnight courier of the original proof of claim, or hand delivering to:

Dotan Y. Melech, Receiver  
United AMS  
8350 W. Sahara Ave. Suite 150  
Las Vegas, NV 89117

d. On or before the General Bar Date.

2. The Receiver requests that the Order provide that (a) Proofs of Claims sent in any other manner, such as by facsimile, telecopy or electronic email transmission, will not be accepted, and (b) all Proofs of Claims will be deemed timely submitted to the Receiver only if and when actually received, with original signatures by the Receiver on or before the General Bar Date if delivered by hand, or postmarked on or before the General Bar Date if mailed. Facsimile or electronic signatures are not acceptable.

3. The Receiver proposes that any creditor or party-in-interest that fails to submit a timely Proof of Claim with the Receiver in the above-captioned matter relating to CWNevada and the Receivership Estate, but fails to do so in a timely manner ("Untimely Claim") shall be forever barred, estopped and enjoined from asserting any claim against CWNevada and the Receivership Estate and shall not be entitled to receive any distribution on account of any and all Untimely Claims. The Receivership Estate shall be forever discharged from any and all indebtedness or liability with respect to the Untimely Claim.

4. In addition, the Receiver proposes that all persons and entities asserting claims against CWNevada and the Receivership Estate be required to file their Proofs of Claims with the Receiver in English and denominate their claims in U.S. dollars. If a person or entity does not specify the amount of its claim in U.S. dollars, but instead states the amount of its claim in some other currency, the Receiver reserves the right to convert such claim to U.S. dollars using the applicable conversion rate as of the date of the entry of the Order granting this Renewed Claims Motion, unless the Receiver deems another date to be more appropriate.

**E. Claim Evaluation Process**

1. The Receiver shall independently evaluate each timely submitted Proof of Claim by weighing the credibility of any Admissible Evidence (as defined in paragraph E(3) below) submitted in support of the claim against any related business records of the Receivership Estate, court filings, verified witness statements, and/or other Admissible Evidence available to the

Receiver.<sup>4</sup>

2. Each claimant shall bear the burden of proof by a preponderance of the evidence regarding its claim.

3. Any testimonial and/or documental evidence submitted in support of a Proof of Claim must be evidence that would be deemed admissible in court pursuant to Chapters 47 through 53 of the Nevada Revised Statutes (“Admissible Evidence”). The Receiver, in his discretion, does not need to consider inadmissible evidence submitted in support of a Proof of Claim.

4. The Receiver reserves and retains the right to deny, dispute, or assert offsets or defenses against any timely submitted Proof of Claim (in full or part) as to nature, amount, liability, or otherwise (“Disputed Claims”). An untimely Proof of Claim shall automatically be disallowed unless otherwise ordered by the Court.

5. After evaluating each timely submitted Proof of Claim, the Receiver will mail, by first-class mail, postage prepaid, written notice of the Receiver’s determination regarding each Proof of Claim addressed to the claimant within forty-five (45) days of General Bar Date (“Notice of Determination”). The Notice of Determination will inform each claimant regarding whether the Receiver disputes the claim or any portion thereof and the grounds for any such dispute.

6. Within fourteen (14) days of the Receiver’s Notice of Determination, the Receiver shall file with the Court a claim evaluation report (“Claim Evaluation Report”), identifying allowed and disputed claims. Any claim that is not identified as being disputed in the Claims Evaluation Report shall be deemed allowed.

**F. Objection Process**

1. The Receiver proposes that claimants be allowed up to thirty (30) days after the mailing of the Receiver’s Notice of Determination to submit their objections (“Objection”) to the Receiver’s Notice of Determination (“Objection Deadline”).

<sup>4</sup> The Receiver has the authority to exercise his discretion and best business judgment in evaluating Proofs of Claims. See Receivership Order, on file herein, at §9(d), 7:3-6; §9(e), 7:7-9; §9(f), 7:16-18; §9(g), 7:23-26; §9(s), 10:10-14.

2. The Receiver respectfully requests that an objecting creditor submit its Objection to the Receiver's Notice of Determination utilizing the Creditor Objection Form attached as **Exhibit "C"** to the Order (the "Creditor Objection Form")

3. The Receiver proposes that each objecting creditor be required to submit their Objection as follows ("Approved Objection Procedure"):

- a. A written response stating the grounds upon which the creditor objects to the Receiver's Notice of Determination utilizing the Creditor Objection Form;
- b. Any additional documentation not previously submitted that supports the Proof of Claim;
- c. Deliver the Objection to the Receiver either by mail, messenger, overnight courier, or hand delivering to:  
Dotan Y. Melech, Receiver  
United AMS  
8350 W. Sahara Ave. Suite 150  
Las Vegas, NV 89117
- d. Within thirty (30) days after the Receiver's mailing of the written Notice of the Determination.

4. The Objection shall be deemed timely if delivered or postmarked (if mailed) no later than thirty (30) days after the Receiver's mailing of the written Notice of the Determination.

5. For each Objection submitted pursuant to the Approved Objection Procedure ("Compliant Objection"), the Receiver will file a report with the Court that identifies any unresolved Compliant Objections so that an evidentiary hearing may be set with this Court for the resolution of such Compliant Objections so long as the claim is not related to any litigation that is pending at the time of the General Bar Date.

5. The Receiver will notify claimants of the time and place of each evidentiary hearing so set by this Court within seven (7) days of the hearing being set.

6. Should any Compliant Objections be related to litigation that is pending at the time of the General Bar Date, the Receiver proposes that such Compliant Objections be adjudicated in

the pending litigation, or the parties may stipulate to transfer any pending litigation to this Court in order for this Court to adjudicate the dispute.

**G. Distribution Process**

1. The Receiver intends to file a future motion requesting approval from the Court to make distributions on Approved Claims after all Proof of Claims have been resolved. The Receiver also reserves the right to request interim distributions to creditors with a hold back to account for the ratable distribution of any Disputed Claim as though deemed allowed.

2. At that time, the Receiver intends to generally follow the Bankruptcy Code to determine order of priority for distribution.

3. The Receiver intends to propose making distributions to the following classes of approved creditor claims in full, or retaining adequate funds for such payment, before making even partial payments on any inferior class of creditor claims ("Priority Claims"):

- a. Administrative expenses (including the Receiver's fees as approved by the Court);
- b. Receiver Certificates;
- Secured creditors as to their specific collateral (including creditors with recorded judgments) and to the extent of the value of their collateral;
- c. Unpaid wage claims;
- c. Employee benefits; and
- d. Taxes and other governmental fees and/or fines.

4. After satisfying all Priority Claims, the Receiver intends to propose making distributions of any remaining assets of the Receivership Estate to general unsecured creditors with approved claims on a *pro rata* basis (including under-secured creditors, which would also include creditors with recorded judgments not satisfied by collateral).

5. Payment of interest holders, but only if and after general unsecured creditors are paid in full.

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1 **III. CONCLUSION**

2 Based upon the foregoing, the Receiver respectfully requests that this Court enter the Order  
3 as proposed herein as **Exhibit "1"** granting the relief requested in this Renewed Claims Motion  
4 and granting such other and further relief that the Court deems just and proper.

5 Dated this 13<sup>th</sup> day of December 2019.

6 **HOLLEY DRIGGS WALCH**  
7 **FINE PUZEY STEIN & THOMPSON**

8   
9 RICHARD F. HOLLEY, ESQ.  
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11 JOHN J. SAVAGE, ESQ.  
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15 *Attorneys for Dotan Y. Melech, Receiver*  
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# **EXHIBIT “1”**

**ORDR**

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**DISTRICT COURT**

**CLARK COUNTY, NEVADA**

NUVEDA, LLC, a Nevada Limited Liability  
Company; and CWNEVADA LLC, a Nevada  
Limited Liability Company,

Plaintiffs,

v.

4FRONT ADVISORS LLC, foreign limited  
liability company, DOES I through X and ROE  
ENTITIES, II through XX, inclusive,

Defendants.

Case No.: A-17-755479-B  
Dept. No.: 11

**ORDER APPROVING CLAIMS PROCESS**

This matter having come on for hearing before the Honorable Elizabeth Gonzalez in  
Department XI on the Renewed Motion to Approve Claims Process, on Shortened Time  
("Motion"), filed by Dotan Y. Melech, the Court-appointed receiver CWNevada, LLC  
("CWNevada") in the above-captioned action (the "Receiver"), by and through its counsel,  
Richard F. Holley, Esq. and John J. Savage, Esq. of the law firm of Holley Driggs, and the Court  
having reviewed the Motion, and all oppositions to the Motion, if any, having been resolved,  
withdrawn or overruled; and the Court having determined that the legal and factual bases set forth  
in the Motion establish just cause of the relief granted herein; and after due deliberation and  
sufficient cause appearing therefor



THE COURT HEREBY FINDS AND CONCLUDES AS FOLLOWS:

A. This Court concludes that the notice of the Motion given by the Receiver constitutes due, sufficient and appropriate (i) notice of the Motion and (ii) opportunity for a hearing on the Motion, and the notice requirements are deemed satisfied.

B. The Receiver has demonstrated sufficient cause to grant the relief requested in the Motion.

C. Based upon the foregoing and upon the record made before this Court at the hearing on the Motion, and good and sufficient cause appearing therefor

IT IS HEREBY ORDERED THAT:

1. The Motion is granted in its entirety.

2. The Receiver's proposed Bar Date Notice, a copy of which is attached hereto as **Exhibit "A"**, is approved and may be used in the above-captioned case.

3. The Receiver's proposed Proof of Claim Form, a copy of which is attached hereto as **Exhibit "B"**, is approved and may be used in the above-captioned case.

4. The Receiver's proposed Objection Form, a copy of which is attached hereto as **Exhibit "C"**, is approved and may be used in the above-captioned case.

5. The deadline to file a proof of claim with the Receiver for all persons or entities holding or wishing to assert a claim against CWNevada and the Receivership Estate ("Proof of Claim") shall be sixty (60) days from the notice of entry of this Order and the initial date of publication of the Bar Date Notice in the *Las Vegas Review Journal* (the "Bar Date").

6. Proofs of Claims must be submitted to the Receiver follows ("Approved Submission Procedure"):

- a. Submit an original, fully executed claim using the Proof of Claim Form,
- b. Attach documents supporting or evidencing the claim,
- c. Deliver the Proof of Claim to the Receiver either by mail, messenger, overnight courier of the original proof of claim, or hand delivering to:

Dotan Y. Melech, Receiver  
United AMS  
8350 W. Sahara Ave. Suite 150

Las Vegas, NV 89117

d. On or before the Bar Date.

7. Notice of the Bar Date shall be deemed adequate, sufficient and shall be deemed in compliance with this Order if the Bar Date Notice is served pursuant to the terms of this Order.

8. The Receiver shall cause copies of the Bar Date Notice and Proof of Claim Form to be mailed by first class United States mail to known creditors no later than seven (7) business days after the notice of entry of this Order is filed.

9. The Receiver shall cause the publication of Notice of the Bar Date, substantially in the form of the Bar Date Notice attached to this Order as **Exhibit "A"**, in the *Las Vegas Review Journal* by no later than seven (7) business days after the notice of entry of this Order is filed, which publication shall run three (3) consecutive weeks, once a week during said time.

10. Any creditor or party-in-interest that fails to submit a timely Proof of Claim with the Receiver in the above-captioned matter relating to CWNevada and the Receivership Estate, but fails to do so in a timely manner ("Untimely Claim") shall be forever barred, estopped and enjoined from asserting any claim against CWNevada and the Receivership Estate and shall not be entitled to receive any distribution on account of any and all Untimely Claims. The Receivership Estate shall be forever discharged from any and all indebtedness or liability with respect to the Untimely Claim.

11. Proofs of Claims shall be deemed timely submitted to the Receiver only if and when actually received, with original signatures by the Receiver on or before the Bar Date if delivered by hand, or postmarked on or before the Bar Date if mailed. Facsimile or electronic signatures are not acceptable.

12. All persons and entities asserting claims against the Receivership Estate are required to file proofs of claim in English and denominate their claims in U.S. dollars. If a person or entity does not specify the amount of its claim in U.S. dollars, but instead states the amount of its claim in some other currency, the Receiver reserves the right to convert such claim to U.S. dollars using the applicable conversion rate as of the Order date, unless the Receiver deems another date to be more appropriate.

13. The Receiver shall independently evaluate each timely submitted Proof of Claim by weighing the credibility of any Admissible Evidence (as defined in paragraph 15 below) submitted in support of the claim against any related business records of the Receivership Estate, court filings, verified witness statements, and/or other Admissible Evidence available to the Receiver.

14. Each claimant shall bear the burden of proof by a preponderance of the evidence regarding its claim.

15. Any testimonial and/or documental evidence submitted in support of a Proof of Claim must be evidence that would be deemed admissible in court pursuant to Chapters 47 through 53 of the Nevada Revised Statutes ("Admissible Evidence").

16. The Receiver, in his discretion, does not need to consider inadmissible evidence submitted in support of a Proof of Claim.

17. The Receiver reserves and retains the right to deny, dispute, or assert offsets or defenses against any timely submitted Proof of Claim (in full or part) as to nature, amount, liability, or otherwise ("Disputed Claims"). An untimely Proof of Claim shall automatically be disallowed unless otherwise ordered by this Court.

18. After evaluating each timely submitted Proof of Claim, the Receiver shall mail, by first-class mail, postage prepaid, written notice of the Receiver's determination regarding each Proof of Claim addressed to the claimant within forty-five (45) days of Bar Date ("Notice of Determination"). The Notice of Determination will inform each claimant regarding whether the Receiver disputes the claim or any portion thereof and the grounds for any such dispute.

19. Within fourteen (14) days of the Receiver's Notice of Determination, the Receiver shall file with the Court a claim evaluation report ("Claim Evaluation Report"), identifying allowed and disputed claims. Any claim that is not identified as being disputed in the Claims Evaluation Report, shall be deemed allowed.

20. Any objections to the Receiver's Notice of Determination must be submitted to the Receiver as follows ("Approved Objection Procedure");

- a. A written response stating the grounds upon which the creditor objects to the Receiver's Notice of Determination utilizing the Objection Form;
- b. Any additional documentation not previously submitted that supports the Proof of Claim;
- c. Deliver the Objection to the Receiver either by mail, messenger, overnight courier, or hand delivering to:  
  
Dotan Y. Melech, Receiver  
United AMS  
8350 W. Sahara Ave. Suite 150  
Las Vegas, NV 89117
- d. Within thirty (30) days after the Receiver's mailing of the written Notice of the Determination.

21. The Objection shall be deemed timely if delivered or postmarked (if mailed) no later than thirty (30) days after the Receiver's mailing of the written Notice of the Determination.

22. For each Objection submitted pursuant to the Approved Objection Procedure ("Compliant Objection"), the Receiver shall file a report with the Court that identifies any unresolved Compliant Objections so that an evidentiary hearing may be set with this Court for the resolution of such Compliant Objections so long as the claim is not related to any litigation that is pending at the time of the Bar Date.

23. The Receiver will notify claimants of the time and place of each evidentiary hearing so set by this Court within seven (7) days of the hearing being set.

24. Compliant Objections that are related to litigation pending at the time of the Bar Date shall be adjudicated in the pending litigation unless the parties stipulate to transfer any pending litigation to this Court in order for this Court to adjudicate the dispute.

25. The provisions of this Order apply to all claims of whatever character, against the Receivership Estate or its assets, whether secured or unsecured, priority or nonpriority, liquidated or unliquidated, fixed or contingent.

26. The Receiver is authorized and empowered to take such steps and perform such acts as may be necessary to implement and effectuate the terms of this Order.

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27. The terms and conditions of this Order shall be immediately effective and enforceable upon entry of this Order.

28. This Court retains jurisdiction with respect to all matters arising from or related to the implementation and interpretation of this Order.

IT IS SO ORDERED.

DATED this \_\_\_\_\_ day of \_\_\_\_\_, 2019.

\_\_\_\_\_  
DISTRICT COURT JUDGE

Submitted By:

**HOLLEY DRIGGS WALCH**  
**FINE PUZEY STEIN & THOMPSON**

\_\_\_\_\_  
RICHARD F. HOLLEY, ESQ.  
Nevada Bar No. 3077  
JOHN J. SAVAGE, ESQ.  
Nevada Bar No. 11455  
400 South Fourth Street, Third Floor  
Las Vegas, Nevada 89101  
*Attorneys for Dotan Y. Melech, Receiver*

# **EXHIBIT “A”**

**to Order Approving Claims Process**

**NOTC**  
 RICHARD F. HOLLEY, ESQ.  
 Nevada Bar No. 3077  
 E-mail: rholley@nevadafirm.com  
 JOHN J. SAVAGE, ESQ.  
 Nevada Bar No. 11455  
 E-mail: jsavage@nevadafirm.com  
 HOLLEY DRIGGS WALCH  
 FINE PUZEY STEIN & THOMPSON  
 400 South Fourth Street, Third Floor  
 Las Vegas, Nevada 89101  
 Telephone: 702/791-0308  
 Facsimile: 702/791-1912  
*Attorneys for Dotan Y. Melech, Receiver*

**DISTRICT COURT**  
**CLARK COUNTY, NEVADA**

NUVEDA, LLC, a Nevada Limited Liability  
 Company; and CWNEVADA LLC, a Nevada  
 Limited Liability Company,

Plaintiffs,

v.

4FRONT ADVISORS LLC, foreign limited  
 liability company, DOES I through X and ROE  
 ENTITIES, II through XX, inclusive,

Defendants.

Case No.: A-17-755479-B  
 Dept. No.: 11

**NOTICE OF DEADLINE TO SUBMIT PROOF OF CLAIM**

TO ALL PERSONS AND ENTITIES WITH CLAIMS AGAINST CWNEVADA LLC:

**PLEASE TAKE NOTICE THAT** on July 10, 2019, the Eighth Judicial District Court, Clark County, Nevada, Case No. A-17-755479-B, the presiding Court entered an Order Appointing Receiver, thereby appointing Dotan Y. Melech as Receiver (the "Receiver") of the Receivership Estate and over CWNEVADA LLC ("CWNeveda").

**PLEASE TAKE NOTICE THAT** the presiding Court has now entered an Order Approving Claims Process ("Bar Date Order"), which, among other things, establishes the deadline for all persons and entities to submit a proof of claim with the Receiver against CWNeveda within **sixty**

(60) days from the notice of entry of the Bar Date Order. A copy of the Notice of Entry of Bar Date Order is enclosed herein for your records.

**PLEASE TAKE FURTHER NOTICE THAT** the Bar Date Order, as well as the procedures set forth below for the filing of proofs of claim, apply to the claims against the Receivership Estate and CWNevada that arose prior to the entry of the Receivership Order dated July 10, 2019, except for those holders of the claims listed in Section II below.

**I. WHO MUST SUBMIT A PROOF OF CLAIM**

You **MUST** timely submit a proof of claim with the Receiver to share in any distribution from the Receivership Estate if you have a claim that arose prior to the entry of the Receivership Order dated July 10, 2019, and it is not one of the types of claims described in Section II below ("Proof of Claim"). Claims based on acts or omissions of CWNevada that occurred before the date of the entry of the Receivership Order must be submitted on or prior to the Bar Date even if such claims are not now fixed, liquidated or certain or did not mature or become fixed or liquidated or certain before the date of the entry of the Receivership Order.

A "claim" means: (a) a right to payment, whether or not such right is reduced to judgment, liquidated, unliquidated, fixed, contingent, matured, unmatured, disputed, undisputed, legal, equitable, secured or unsecured; or (b) a right to an equitable remedy for breach of performance if such breach gives rise to a right to payment, whether or not such right to an equitable remedy is reduced to judgment, fixed, contingent, matured, unmatured, disputed, undisputed, secured or unsecured.

**II. WHO NEED NOT SUBMIT A PROOF OF CLAIM**

Notwithstanding the foregoing, **AT THIS TIME**, you do **NOT** need to submit a Proof of Claim on or before the Bar Date if your claim has already been paid in full by anyone, including, but not limited to, CWNevada.

**THIS NOTICE IS BEING SENT TO MANY PERSONS AND ENTITIES THAT HAVE HAD MADE INVESTMENTS IN, HAD SOME RELATIONSHIP WITH OR HAVE DONE BUSINESS WITH CWNEVADA BUT MAY NOT HAVE AN UNPAID CLAIM AGAINST CWNEVADA. YOU SHOULD NOT SUBMIT A PROOF OF CLAIM IF YOU**



DO NOT HAVE A CLAIM AGAINST CWNEVADA, OR IF THE CLAIM YOU HELD AGAINST CWNEVADA HAS BEEN PAID IN FULL. THE FACT THAT YOU HAVE RECEIVED THIS NOTICE DOES NOT MEAN THAT YOU HAVE A CLAIM OR THAT THE RECEIVER OR THE COURT BELIEVES THAT YOU HAVE A CLAIM.

**III. WHERE TO SUBMIT A PROOF OF CLAIM**

All Proofs of Claims must be submitted to the Receiver follows ("Approved Submission Procedure"):

- a. Submit an original, fully executed claim using the Proof of Claim Form,
- b. Attach documents supporting or evidencing the claim,
- c. Deliver the Proof of Claim to the Receiver either by mail, messenger, overnight courier of the original proof of claim, or hand delivering to:  
  
Dotan Y. Melech, Receiver  
United AMS  
8350 W. Sahara Ave. Suite 150  
Las Vegas, NV 89117
- d. On or before the Bar Date.

All Proofs of Claims will be deemed timely submitted only if actually received, with original signatures, by the Receiver on or before the Bar Date if delivered by hand, or postmarked on or before the Bar Date if mailed. Proofs of Claims may not be delivered by facsimile, telecopy transmission or electronic mail transmission.

**IV. WHAT TO SUBMIT**

If you submit a Proof of Claim, your Proof of Claim must (i) be written in English, (ii) be denominated in U.S. dollars, (iii) confirm substantially with the attached proof of claim form, and (iv) be an original document, signed by the claimant or if the claimant is not an individual, by an authorized agent of the claimant. You should use the **Proof of Claim Form enclosed with this Notice**. You should attach to your completed Proof of Claim Form copies of any writings upon which such claim is based (if voluminous, attach a summary) or an explanation as to why the documents are not available.

Any testimonial and/or documental evidence submitted with your completed Proof of Claim Form must be evidence that would be deemed admissible in court pursuant to Chapters 47 through 53 of the Nevada Revised Statutes ("Admissible Evidence").

**V. CONSEQUENCES OF FAILURE TO TIMELY SUBMIT A PROOF OF CLAIM BY THE BAR DATE**

any creditor or party-in-interest that fails to submit a timely Proof of Claim with the Receiver in the above-captioned matter relating to CWNevada and the Receivership Estate, but fails to do so in a timely manner ("Untimely Claim") shall be forever barred, estopped and enjoined from asserting any claim against CWNevada and the Receivership Estate and shall not be entitled to receive any distribution on account of any and all Untimely Claims. The Receivership Estate shall be forever discharged from any and all indebtedness or liability with respect to the Untimely Claim.

**VI. THE EVALUATION PROCESS**

The Receiver will independently evaluate each timely submitted Proof of Claim by weighing the credibility of any Admissible Evidence submitted in support of the claim against any related business records of the Receivership Estate, court filings, verified witness statements, and/or other Admissible Evidence available to the Receiver. Each claimant shall bear the burden of proof by a preponderance of the evidence regarding its claim. The Receiver, in his discretion, does not need to consider inadmissible evidence submitted in support of a Proof of Claim.

The Receiver reserves and retains the right to deny, dispute, or assert offsets or defenses against any timely submitted Proof of Claim (in full or part) as to nature, amount, liability, or otherwise ("Disputed Claims"). An untimely Proof of Claim shall automatically be disallowed unless otherwise ordered by the Court.

After evaluating each timely submitted Proof of Claim, the Receiver will mail, by first-class mail, postage prepaid, written notice of the Receiver's determination regarding each Proof of Claim addressed to the claimant within forty-five (45) days of General Bar Date ("Notice of Determination"). The Notice of Determination will inform each claimant regarding whether the Receiver disputes the claim or any portion thereof and the grounds for any such dispute.

Within fourteen (14) days of the Receiver's Notice of Determination, the Receiver will file with the Court a claim evaluation report ("Claim Evaluation Report"), identifying allowed and disputed claims. Any claim that is not identified as being disputed in the Claims Evaluation Report will be deemed allowed.

Any objections to the Receiver's Notice of Determination must be submitted to the Receiver as follows ("Approved Objection Procedure"):

- a. submit a written response stating the grounds upon which the creditor objects to the Receiver's Notice of Determination utilizing the Objection Form (**to be included in Notice of Determination for Disputed Claims**);
- b. Any additional documentation not previously submitted that supports the Proof of Claim;
- c. Deliver the Objection to the Receiver either by mail, messenger, overnight courier, or hand delivering to:  
  
Dotan Y. Melech, Receiver  
United AMS  
8350 W. Sahara Ave. Suite 150  
Las Vegas, NV 89117
- d. Within thirty (30) days after the Receiver's mailing of the written Notice of the Determination.

The Objection shall be deemed timely if delivered or postmarked (if mailed) no later than thirty (30) days after the Receiver's mailing of the written Notice of the Determination.

For each Objection submitted pursuant to the Approved Objection Procedure ("Compliant Objection"), the Receiver will file a report with the Court that identifies any unresolved Compliant Objections so that an evidentiary hearing may be set with the presiding Court for the resolution of such Compliant Objections so long as the claim is not related to any litigation that is pending at the time of the Bar Date. The Receiver will notify claimants of the time and place of each evidentiary hearing so set by this Court within seven (7) days of the hearing being set.

1 Any Compliant Objections related to litigation that is pending at the time of the Bar Date  
2 will be adjudicated in the pending litigation unless the parties may stipulate to transfer any pending  
3 litigation to the Receivership Court in order for the Receivership Court to adjudicate the dispute.

4 **YOU SHOULD CONSULT AN ATTORNEY REGARDING ANY MATTERS NOT**  
5 **COVERED BY THIS NOTICE, SUCH AS WHETHER YOU SHOULD SUBMIT A PROOF**  
6 **OF CLAIM.**

7 **QUESTIONS CONCERNING THIS NOTICE SHOULD BE DIRECTED TO**  
8 **UNITED AMS, THE COURT APPOINTED RECEIVER, BY EMAILING**  
9 **info@unitedams.com.**

10  
11 Dated this \_\_\_\_\_ day of \_\_\_\_\_ 2019.

12 **HOLLEY DRIGGS WALCH**  
13 **FINE PUZEY STEIN & THOMPSON**

14 \_\_\_\_\_  
15 RICHARD F. HOLLEY, ESQ.  
16 Nevada Bar No. 3077  
17 JOHN J. SAVAGE, ESQ.  
18 Nevada Bar No. 11455  
19 400 South Fourth Street, Third Floor  
20 Las Vegas, Nevada 89101  
21 *Attorneys for Dotan Y. Melech, Receiver*  
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# **EXHIBIT “B”**

**to Order Approving Claims Process**

**PROF**  
RICHARD F. HOLLEY, ESQ.  
Nevada Bar No. 3077  
E-mail: rholley@nevadafirm.com  
JOHN J. SAVAGE, ESQ.  
Nevada Bar No. 11455  
E-mail: jsavage@nevdafirm.com  
HOLLEY DRIGGS WALCH  
FINE PUZEY STEIN & THOMPSON  
400 South Fourth Street, Third Floor  
Las Vegas, Nevada 89101  
Telephone: 702/791-0308  
Facsimile: 702/791-1912  
*Attorneys for Dotan Y. Melech, Receiver*

**DISTRICT COURT**  
**CLARK COUNTY, NEVADA**

NUVEDA, LLC, a Nevada Limited Liability  
Company; and CWNEVADA LLC, a Nevada  
Limited Liability Company,

Plaintiffs,

v.

4FRONT ADVISORS LLC, foreign limited  
liability company, DOES I through X and ROE  
ENTITIES, II through XX, inclusive,

Defendants.

Case No.: A-17-755479-B  
Dept. No.: 11

**PROOF OF CLAIM**

\_\_\_\_\_, a creditor of CWNevada, LLC,  
hereby submits the following claim as an [ ] unsecured claim or [ ] secured claim [check a box]  
and provides the basis for the claim as follows:

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The total claim amount as of \_\_\_\_\_, 20\_\_, is \$\_\_\_\_\_, with interest continuing to accrue at the rate of \$\_\_\_\_\_ per day, plus legal fees and costs in the amount of \$\_\_\_\_\_.

State of \_\_\_\_\_  
County of \_\_\_\_\_

\_\_\_\_\_[name], being duly sworn states: that he/she is the duly authorized agent of \_\_\_\_\_ who has submitted the foregoing claim against CWNevada, LLC; that the amount of the claim is justly due or is a just demand and will become due on the date set forth above; that all payments have been credited; that there are no offsets known to affiant which have not been credited; and (complete if applicable) affiant rather than the creditor has submitted this claim for the following reason:

\_\_\_\_\_  
\_\_\_\_\_  
\_\_\_\_\_

Creditor: \_\_\_\_\_

By: \_\_\_\_\_

Address: \_\_\_\_\_

Phone - \_\_\_\_\_

Fax - \_\_\_\_\_

Signed and sworn (or affirmed) to before me this \_\_\_\_ day of \_\_\_\_\_, 20\_\_, by

\_\_\_\_\_ (name of person making statement).

\_\_\_\_\_  
NOTARY PUBLIC

# **EXHIBIT “C”**

**to Order Approving Claims Process**



**OBJ**

RICHARD F. HOLLEY, ESQ.  
Nevada Bar No. 3077  
E-mail: rholley@nevadafirm.com  
JOHN J. SAVAGE, ESQ.  
Nevada Bar No. 11455  
E-mail: jsavage@nevadafirm.com  
HOLLEY DRIGGS WALCH  
FINE PUZEY STEIN & THOMPSON  
400 South Fourth Street, Third Floor  
Las Vegas, Nevada 89101  
Telephone: 702/791-0308  
Facsimile: 702/791-1912  
*Attorneys for Dotan Y. Melech, Receiver*

**DISTRICT COURT**

**CLARK COUNTY, NEVADA**

NUVEDA, LLC, a Nevada Limited Liability  
Company; and CWNEVADA LLC, a Nevada  
Limited Liability Company,

Plaintiffs,

v.

4FRONT ADVISORS LLC, foreign limited  
liability company, DOES I through X and ROE  
ENTITIES, II through XX, inclusive,

Defendants.

Case No.: A-17-755479-B  
Dept. No.: 11

**OBJECTION TO RECEIVER'S NOTICE OF DETERMINATION**

\_\_\_\_\_, a creditor of CWNevada, LLC  
hereby objects to the Receiver's Notice of Determination and provides the basis for the objection  
as follows:

\_\_\_\_\_  
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\_\_\_\_\_

The Receiver's Notice of Determination allowed this creditor's claim amount in the amount of \$\_\_\_\_\_. This creditor hereby demands payment in the amount of \$\_\_\_\_\_ to this resolve this disputed claim and forever release CWNevada, LLC and Dotan Y. Melech, the Court-appointed receiver over CWNevada, LLC from any and all related liability now known or unknown.

State of \_\_\_\_\_  
County of \_\_\_\_\_

\_\_\_\_\_[name], being duly sworn states: that he/she is the duly authorized agent of \_\_\_\_\_ who has submitted the underlying claim against CWNevada, LLC and the foregoing objection to the Receiver's Notice of Determination; that the amount of the claim is justly due or is a just demand and will become due on the date set forth above; that all payments have been credited; that there are no offsets known to affiant which have not been credited; and (complete if applicable) affiant rather than the creditor has submitted this claim for the following reason:

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Creditor: \_\_\_\_\_

By: \_\_\_\_\_

Address: \_\_\_\_\_

Phone - \_\_\_\_\_

Fax - \_\_\_\_\_

Signed and sworn (or affirmed) to before me this \_\_\_\_ day of \_\_\_\_\_, 20\_\_, by

(name of person making statement).

---

NOTARY PUBLIC

NOTARY PUBLIC

# **EXHIBIT “2”**

1 **DECL**  
2 RICHARD F. HOLLEY, ESQ.  
3 Nevada Bar No. 3077  
4 E-mail: rholley@nevadafirm.com  
5 JOHN J. SAVAGE, ESQ.  
6 Nevada Bar No. 11455  
7 E-mail: jsavage@nevadafirm.com  
8 HOLLEY DRIGGS WALCH  
9 FINE PUZEY STEIN & THOMPSON  
10 400 South Fourth Street, Third Floor  
11 Las Vegas, Nevada 89101  
12 Telephone: 702/791-0308  
13 Facsimile: 702/791-1912

14 *Attorneys for Dotan Y. Melech, Receiver*

15 **DISTRICT COURT**

16 **CLARK COUNTY, NEVADA**

17 NUVEDA, LLC, a Nevada Limited Liability  
18 Company; and CWNEVADA LLC, a Nevada  
19 Limited Liability Company,

20 Plaintiffs,

21 v.

22 4FRONT ADVISORS LLC, foreign limited  
23 liability company, DOES I through X and ROE  
24 ENTITIES, II through XX, inclusive,

25 Defendants.

Case No.: A-17-755479-B  
Dept. No.: 11

26 **DECLARATION OF DOTAN Y. MELECH**

27 I, Dotan Y. Melech, do hereby voluntarily state under penalty of perjury as follows:

28 1. I am the Court-appointed receiver over CWNevada, LLC ("CWNevada") in this  
matter.

2. I am over the age of 18 years and I am competent to make this declaration. I have  
personal knowledge of the facts set forth herein.

3. I make this Declaration in support of the Renewed Motion to Approve Claims  
Process ("Renewed Claims Motion").

1           4.     The State of Nevada Department of Taxation (the “State”) and other creditors, have  
2 repeatedly asked me to provide the total amount of claims outstanding against CWNevada and the  
3 complete list of CWNevada’s creditors.

4           5.     I cannot comply with State’s request, or the request by other creditors, until I have  
5 completed the claims process.

6           6.     Based on the information available at this time, I estimate there will likely be over  
7 one hundred (100) creditors of CWNevada with claims totaling approximately fifty-million dollars  
8 (\$50,000,000.00).

9           7.     As of the date of the Renewed Claims Motion, I am in the process of preserving,  
10 maintaining and protecting the Receivership Estate, investigating the creditors of the Receivership  
11 Estate, and the alleged claims of and against the Receivership Estate in order to administer the  
12 Receivership Estate as expeditiously and cost effectively as possible.

13           8.     To ensure that the creditors of the Receivership Estate are placed on notice and  
14 provide timely support of their respective claims in an orderly fashion to allow me to ascertain the  
15 creditor pool against the Receivership Estate, I am bringing the Renewed Claims Motion to  
16 establish the following:

- 17                   a. proof of claim bar date;
- 18                   b. procedures for filing proofs of claim;
- 19                   c. form and manner of notice of bar date to all creditors;
- 20                   d. Evaluation Process; and
- 21                   e. Objection Process.

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

24           DATED this \_\_ day of December, 2019.

25  
26   
27 DOTAN Y. MELECH  
28

**CERTIFICATE OF SERVICE**

I HEREBY CERTIFY that I am an employee of Holley Driggs Walch Fine Puzey Stein & Thompson and that on the 18th day of December 2019, and pursuant to NRCP 5(b) and NEFCR 9, I caused to be served electronically using the Court's electronic filing system (EFS) the foregoing RENEWED MOTION TO APPROVE CLAIMS PROCESS ON ORDER SHORTENING TIME to all registered users on the above-captioned case in the Eighth Judicial District Court Electronic Filing System.

**Parties:**

Nuveda LLC - Plaintiff  
4Front Advisors LLC - Defendant  
CW Nevada LLC - Plaintiff  
CIMA Group LLC - Other  
Highland Partners NV LLC - Intervenor  
MI-CW Holdings Fund 2 LLC - Intervenor  
MI-CW Holdings LLC - Intervenor  
Green Pastures Fund, LLC Series 1 (CW Nevada, LLC) - Intervenor  
Jakal Investments, LLC - Intervenor  
Green Pastures Group, LLC - Intervenor  
Jonathan S. Fenn Revocable Trust - Intervenor  
Growth Opportunities, LLC - Intervenor  
CIMA Group LLC - Intervenor  
Timothy Smits Van Oyen - Intervenor  
Dotan Y Melech - Receiver  
Nevada Department of Taxation - Other  
Brian C Padgett - Intervenor



An employee of Holley Driggs Walch Fine  
Puzey Stein & Thompson