

CAUSE NO. D-1-GV-10-000454

STATE OF TEXAS,	§	IN THE DISTRICT COURT OF
	§	
Plaintiff,	§	
v.	§	TRAVIS COUNTY, TEXAS
	§	
RETIREMENT VALUE, LLC, et al,	§	
	§	
Defendants.	§	126 <sup>th</sup> JUDICIAL DISTRICT

**RECEIVER'S CERTIFICATE OF NO OBJECTIONS  
TO THE THIRTY-SIXTH APPLICATION FOR FEES  
BY THE RECEIVER AND RECEIVER'S COUNSEL**

Eduardo S. Espinosa, court-appointed receiver for Retirement Value, LLC, hereby certifies that no party has objected to the Thirty-Sixth Application for Fees by the Receiver and Receiver's Counsel.

Under the Agreed TI entered in this case, the Receiver is to submit to the Court and the parties of record a request for payment of expenses related to professionals. If no objection is filed with the Court within ten days of filing, then the Receiver can pay the expenses without further order of the Court. Agreed TI at 15. The Receiver filed the Application with the Court and served it on all parties on October 12, 2021. No party filed an objection to the Application within the ten days provided by the Agreed TI. Pursuant to the Agreed TI, the Receiver will pay the fees for each professional as requested in the Application from the funds available to the estate.

Respectfully submitted,

By: /s/ Michael D. Napoli  
Michael D. Napoli  
State Bar No. 14803400

AKERMAN, LLP  
2001 Ross Avenue, Suite 3600  
Dallas, Texas 75201  
(214) 720-4360  
(214) 720-8116 (fax)  
Michael.Napoli@akerman.com

**COUNSEL FOR EDUARDO S. ESPINOSA,  
RECEIVER**

## **CERTIFICATE OF SERVICE**

I hereby certify that a true and correct copy of the foregoing document has been forwarded to all counsel of record listed below, through the electronic filing manager if that counsel's e-mail address is on file or via e-mail, if not, on this 25<sup>th</sup> day of October, 2021.

Jack Hohengarten  
TEXAS ATTORNEY GENERAL  
Financial and Tax Litigation Division  
300 W. 15<sup>th</sup> Street, Sixth Floor  
Austin, Texas 78711-2548  
(512) 475-3503  
(512) 477-2348 fax  
[jack.hohengarten@texasattorneygeneral.gov](mailto:jack.hohengarten@texasattorneygeneral.gov)  
**COUNSEL FOR THE STATE OF TEXAS**

John W. Thomas  
John R. McConnell  
GEORGE BROTHERS KINCAID & HORTON, LLP  
114 W Seventh, Suite 1100  
Austin, Texas 78701-3015  
(512) 495-1400  
(512) 499-0094 fax  
[jthomas@gbkh.com](mailto:jthomas@gbkh.com)  
[jmcconnell@gbkh.com](mailto:jmcconnell@gbkh.com)  
**COUNSEL FOR RV RECEIVERS**

Geoffrey D. Weisbart  
Mia A. Storm  
WEISBART SPRINGER HAYES LLP  
212 Lavaca Street, Suite 200  
Austin, Texas 78701  
(512) 652-5780  
(512) 682-2074 fax  
[gweisbart@wshllp.com](mailto:gweisbart@wshllp.com)  
[mstorm@wshllp.com](mailto:mstorm@wshllp.com)  
**COUNSEL FOR THE CAIN INTERVENORS**

Bogdan Rentea  
RENTEA & ASSOCIATES  
1002 Rio Grande Street  
Austin, Texas 78701  
(512) 472-6291  
(512) 472-6278  
[brente@rentelaw.com](mailto:brente@rentelaw.com)  
**COUNSEL FOR WENDY ROGERS**

Isabelle M. Antongiorgi  
TAYLOR DUNHAM, LLP  
301 Congress Avenue, Suite 1050  
Austin, Texas 78701  
(512) 473-2257  
(512) 478-4409 fax  
[iantongiorgi@taylordunham.com](mailto:iantongiorgi@taylordunham.com)  
**COUNSEL FOR HCF RECEIVER**

Alberto T. Garcia III  
GARCIA & MARTINEZ, LLP  
5211 W. Mile 17 ½ Road  
Edinburg, Texas 78541  
(956) 380-3700  
(956) 380-3703 fax  
[albert@garmtzlaw.com](mailto:albert@garmtzlaw.com)  
[yoli@garmtzlaw.com](mailto:yoli@garmtzlaw.com)  
**COUNSEL FOR THE HARRISON INTERVENORS**

Meagan Martin  
STANDLY AND HAMILTON, LLP  
325 N. St. Paul, Suite 3300  
Dallas, Texas 75201  
(214) 234-7900  
(214) 234-7300 fax  
[mmartin@standlyhamilton.com](mailto:mmartin@standlyhamilton.com)  
**COUNSEL FOR HCF INVESTOR INTERVENORS**

Milton G. Hammond  
LAW OFFICE OF MILTON G. HAMMOND  
6406 La Manga Drive  
Dallas, Texas 75248  
(214) 642-0881  
(972) 782-4540 fax  
[mghammondlaw@gmail.com](mailto:mghammondlaw@gmail.com)  
**COUNSEL FOR THE MARLOW INTERVENORS**

Carl Galant  
Nicholas P. Laurent  
MCGINNIS LOCHRIDGE & KILGORE, LLP  
600 Congress Avenue, Suite 2100  
Austin, Texas 78701  
(512) 495-6000  
(512) 495-6093 fax  
[cgalant@mcginnislaw.com](mailto:cgalant@mcginnislaw.com)  
[nlaurent@mcginnislaw.com](mailto:nlaurent@mcginnislaw.com)  
**COUNSEL FOR THIRD PARTY DEFENDANTS  
RON JAMES, DON JAMES, AND JAMES  
SETTLEMENT SERVICES**

/s/ Michael D. Napoli  
Michael D. Napoli

### Automated Certificate of eService

This automated certificate of service was created by the eFiling system. The filer served this document via email generated by the eFiling system on the date and to the persons listed below. The rules governing certificates of service have not changed. Filers must still provide a certificate of service that complies with all applicable rules.

Michael Napoli  
Bar No. 14803400  
michael.napoli@akerman.com  
Envelope ID: 58487933  
Status as of 10/27/2021 11:40 AM CST

#### Case Contacts

Name
Marianne Ross
Scott FDeShazo
Thomas ANesbitt
Henry JAckels
Eric JTaube
Ashley SenaryDahlberg
Michael WO'Donnell
Cleveland RBurke
Michael Napoli
Isabelle M.Antongiorgi
R. James George Jr.
Mia AStorm
Geoffrey DWeisbart
Bogdan Rentea
John W.Thomas
Eric J.Taube
Alberto T.Garcia III
Scott F.Deshazo
Thomas A.Nesbitt
Rachel L.Noffke
Christopher S.Hamilton
Meagan Martin
Angela T.Pacheco
Anne LangdonHamilton
Daniel R.Richards
Tonia L.Lucio
Clark Richards

### Automated Certificate of eService

This automated certificate of service was created by the eFiling system. The filer served this document via email generated by the eFiling system on the date and to the persons listed below. The rules governing certificates of service have not changed. Filers must still provide a certificate of service that complies with all applicable rules.

Michael Napoli  
Bar No. 14803400  
michael.napoli@akerman.com  
Envelope ID: 58487933  
Status as of 10/27/2021 11:40 AM CST

#### Case Contacts

Nicholas P.Laurent
Raymond E.White
Carl R.Galant
David Gray
Elizabeth Gray
Ronald DavidSmith
Paul Trahan
Tina Longoria
Paul Trahan
Ashley SenaryDahlberg
Christopher S.Hamilton
Geoffrey D.Weisbart
Michael Napoli
R. JamesGeorge, Jr.
Eric J.Taube
Alberto TGarcia III
Scott F.Deshazo
Christopher Hamilton
Daniel RRichards
Bogdan Rentea
Milton GHammond
Merit Bennett
Robert LWright
Bogdan Rentea
Milton G.Hammond
Robert L.Wright
Michael W.O'Donnell
Ronald D.Smith

### Automated Certificate of eService

This automated certificate of service was created by the eFiling system. The filer served this document via email generated by the eFiling system on the date and to the persons listed below. The rules governing certificates of service have not changed. Filers must still provide a certificate of service that complies with all applicable rules.

Michael Napoli  
Bar No. 14803400  
michael.napoli@akerman.com  
Envelope ID: 58487933  
Status as of 10/27/2021 11:40 AM CST

#### Case Contacts

Ashley Senary
Paul Trahan
Cristina C.Longoria
David R.Clouston
Leslye E.Moseley
Merritt N.Spencer
James CraigOrr, Jr.
Ana BBanda
John R.McConnell
Larry F.York
Michael O'Donnell
Richard H.Gray
Catherine H.Gray
Christopher R.Richie
Todd A.Marquardt
Jeff Mejia
Christopher S.Hamilton
Eric J.Taube
John Thomas
Milton Hammond
David Clouston
James CraigOrr, Jr.
Merritt N.Spencer
Todd A.Marquardt
J. MCCONNELL
MICHAEL NAPOLI
JOHN McCONNELL
LESLYE MOSELEY

### Automated Certificate of eService

This automated certificate of service was created by the eFiling system. The filer served this document via email generated by the eFiling system on the date and to the persons listed below. The rules governing certificates of service have not changed. Filers must still provide a certificate of service that complies with all applicable rules.

Michael Napoli  
Bar No. 14803400  
michael.napoli@akerman.com  
Envelope ID: 58487933  
Status as of 10/27/2021 11:40 AM CST

#### Case Contacts

BOGDAN RENTEA
Mary SchaerdelDietz
Paul Trahan
Robert Wright
James CraigOrr, Jr.
James CraigOrr, Jr.
Merritt N.Spencer
Billy W.Sparkman
Michael Napoli
Eduardo Espinosa
Mary Dietz
Isabelle M.Antongiorgi
Carl Galant
Benjamin S.DeLeon
Michael Douglas Napoli
Eduardo S. Espinosa
Jack Hohengarten
Isabelle Antongiorgi
Geoffrey D. Weisbart
Milton G.Hammond
Cindy Ferguson
Angela T.Pacheco
James C.Orr
TODD A.MARQUARDT
John R.McConnell
Bogdan Rentea
Nicholas P.Laurent
Eduardo Espinosa



### Automated Certificate of eService

This automated certificate of service was created by the eFiling system. The filer served this document via email generated by the eFiling system on the date and to the persons listed below. The rules governing certificates of service have not changed. Filers must still provide a certificate of service that complies with all applicable rules.

Michael Napoli  
Bar No. 14803400  
michael.napoli@akerman.com  
Envelope ID: 58487933  
Status as of 10/27/2021 11:40 AM CST

#### Case Contacts

R. JamesGeorge, Jr.		rjgeorge@gbkh.com	10/25/2021 10:01:57 AM	SENT
Carl RGalant		cgalant@mcginnislaw.com	10/25/2021 10:01:57 AM	SENT
Alberto Garcia		albert@garmtzlaw.com	10/25/2021 10:01:57 AM	SENT
Dale Barron		dbarron@ssb.state.tx.us	10/25/2021 10:01:57 AM	SENT
Richard Gray		texasgraze@gmail.com	10/25/2021 10:01:57 AM	SENT
Nick Laurent		nlaurent@mcginnislaw.com	10/25/2021 10:01:57 AM	SENT
Brianne Smith-Rodriguez		BSmith-Rodriguez@dykema.com	10/25/2021 10:01:57 AM	SENT
Meagan MartinPowers		meagan@martinpowers.com	10/25/2021 10:01:57 AM	SENT