## 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.                   | <b>§</b> | $126^{ m th}$ JUDICIAL DISTRICT |

# RECEIVER'S CERTIFICATE OF NO OBJECTIONS TO THE THIRTY-EIGHTH 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-Eighth 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 14, 2022. 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: <u>/s/ Michael D. Napoli</u>
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 27<sup>th</sup> day of October, 2022.

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

## 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

#### COUNSEL FOR RV RECEIVERS

jmcconnell@gbkh.com

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
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 brentea@rentealaw.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
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 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

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

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

COUNSEL FOR THE MARLOW INTERVENORS cgalant@mcg

nlaurent@mcginnislaw.com

Carl Galant

COUNSEL FOR THIRD PARTY DEFENDANTS RON JAMES, DON JAMES, AND JAMES SETTLEMENT SERVICES

/s/ Michael D. Napoli

Michael D. Napoli