

Troy D. Greenfield, OSB #892534
Email: tgreenfield@schwabe.com
Lawrence R. Ream, (Admitted *Pro Hac Vice*)
Email: lream@schwabe.com
SCHWABE, WILLIAMSON & WYATT, P.C.
1211 SW 5th Ave., Suite 1900
Portland, OR 97204
Telephone: 503.222.9981
Facsimile: 503.796.2900

Attorneys for Receiver for Defendants
AEQUITAS MANAGEMENT, LLC; AEQUITAS HOLDINGS, LLC;
AEQUITAS COMMERCIAL FINANCE, LLC; AEQUITAS
CAPITAL MANAGEMENT, INC.; AEQUITAS INVESTMENT
MANAGEMENT, LLC

IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF OREGON
PORTLAND DIVISION

SECURITIES AND EXCHANGE
COMMISSION,

Plaintiff,

v.

AEQUITAS MANAGEMENT, LLC, *ET AL.*,

Defendants.

Case No. 3:16-cv-00438-JR

**[PROPOSED] ORDER APPROVING
COMPROMISES OF CLAIMS AND
AUTHORIZING PERFORMANCE OF
SETTLEMENT AGREEMENTS**

This matter came before the Court on the Receiver’s Motion For Order Approving the
Compromise of Claims and Authorizing Performance of Settlement Agreements (Dkt.
No. 1010). On behalf of the Receivership Entity, the Receiver executed settlement agreements
with the following counterparties (“Settlement Agreements”):



- Gladstone Technology Partners, LLC, Gladstone Associates, LLC, Gladstone Group, Inc., D.A. Kreuter Associates, Inc. dba DAK Associates, and Daniel A. Kreuter
- The Liquidating Trustee for the bankruptcy estate of Trust Capital Holdings S.à.r.l.
- RP Capital, LLC, Strategic Capital Group, LLC, Norman Gary Price, Christina A. Price, Aaron Douglas Maurer and Laura Michelle Maurer
- Patrick Caponegro
- Enbar, Inc.
- M3 Media Group, Inc.

The Court having considered all papers filed and proceedings held herein and otherwise being fully informed,

NOW, THEREFORE, IT IS HEREBY ORDERED, ADJUDGED, AND DECREED

that:

- (1) the Settlement Agreements are approved; and
- (2) the Receiver is authorized to perform on each of the Settlement Agreements.

IT IS SO ORDERED.

Dated: December _____, 2022.

United States Magistrate Judge Jolie A. Russo

SUBMITTED BY:

SCHWABE, WILLIAMSON & WYATT, P.C.

By: s/Troy D. Greenfield
Troy D. Greenfield, OSB #892534
tgreenfield@schwabe.com
Lawrence R. Ream (Admitted *Pro Hac Vice*)
lream@schwabe.com
Telephone: 503.222.9981
Facsimile: 503.796.2900
Attorneys for the Receiver and Receivership Entity