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

SECURITIES AND EXCHANGE COMMISSION, Plaintiff, vs. AEQUITAS MANAGEMENT, LLC, ET AL, Defendants.	No. 3:16-cv-00438-JR **NOTICE OF RECEIVER'S MOTION TO APPROVE (1) CLASSIFICATION; (2) ALLOWANCE OF CLAIMS FOR CERTAIN CLAIMANTS (ADMINISTRATIVE CLAIMS, CONVENIENCE CLAIMS AND FORMER EMPLOYMENT CLAIMS); AND (3) APPROVING DISTRIBUTIONS TO THOSE CLAIMANTS**

You are receiving this Notice because the Receiver will file a motion that will establish the amount of your Allowed Claim, the treatment of your Allowed Claim and the distribution you will receive on your Allowed Claim.

On or about May 15, 2020, the Receiver will file a Motion to (1) Approve Classification, (2) Allowance of the Amount of claims to certain Claimants (Administrative Claims, Convenience Class Claims, and Former-Employee Claims), and (3) Approving Distributions to those Claimants (the "Receiver's Specified Claimants Motion"). The Specified Claimants Motion is being filed in furtherance of the Receiver's Court-approved distribution plan (the "Court-approved Distribution Plan").[1]

The Court-approved Distribution Plan establishes, among other classes, the following classes of Claimants and how Claimants in those classes will be treated:

- Allowed Administrative Claims. Each such claim shall be paid the full amount of the Allowed Claim.[2]

- Allowed Non-Officer Former Employee Claims. Each such claim shall be paid the full amount of the Allowed Claim (which shall not exceed $12,850).[3]

- Allowed Convenience Class Claims. Each such claim shall be paid an amount equal to twenty percent (20%) of the Allowed Convenience Class Claim.[4]

As set forth in the Court-approved Distribution Plan, a Final Order of the Court shall approve (i)

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[1] The Court's Findings of Fact and Conclusions of Law, entered March 31, 2020 [Dkt. 813].
[2] Distribution Plan [Dkt. 787], definition at 65.
[3] Distribution Plan [Dkt. 787], definition at 65.
[4] Distribution Plan [Dkt. 787], definition at 65-66. The amount of an Allowed Convenience Class Claim cannot exceed $20,000.

the amount, (ii) Classification, and (iii) treatment of claims.[5]

A copy of the Receiver's Specified Claimants Motion is available for review at the Aequitas Receiver's website (www.kccllc.net/aequitasreceivership) and the Receiver's Claims Agent website (https://dm.epiq11.com/aeq/) or can be obtained by email upon request to Receiver's counsel, Larry Ream, at lream@schwabe.com. The Receiver's Specified Claimants Motion sets forth how your claim is to be Classified and treated, the amount of the claim allowed, and the distribution to be made on the claim, if any.

FURTHER ACTION?

You need not take any further action if you agree with the information contained in the Exhibits attached to the Declaration of Ronald F. Greenspan filed in connection with the Receiver's Specified Claimants Motion.

If you wish to support, oppose, or otherwise respond to the Receiver's Specified Claimants Motion, you must do so by no later than May 29, 2020. To comply with that deadline, you must both:

(a) Serve a copy of your written support, opposition or other response, if any, on counsel for the Receiver at:

Troy Greenfield

Lawrence R. Ream

SCHWABE WILLIAMSON & WYATT

1211 SW 5th Ave., Suite 1900

Portland, OR 97204

(b) File the original of your written support, opposition or other response, if any, with the United States District Court, District of Oregon, Portland Division, located at 1000 SW Third Ave., Portland, OR 97204.

The Receiver will thereafter file and serve his reply to written support, objections, or other responses. If there are no objections, the Court can enter an order approving the motion without further notice to you. If there are objections that are unresolved, the Court may schedule a hearing to consider those unresolved objections before the Honorable Judge Jolie A. Russo, Room I 027 at the United States District Court, District of Oregon, Portland Division, 1000 SW Third Ave., Portland, OR 97204.

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[5] Distribution Plan [Dkt. 787].