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FILED
Superior Court of California
County of Los Angeles
10/23/2023

David W. Slayton, Executive Officer / Clerk of Court
By: J. Nichols Deputy

6 Attorneys for Receiver for Reliant Life Shares, LLC

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8 **SUPERIOR COURT FOR THE STATE OF CALIFORNIA**
9 **COUNTY OF LOS ANGELES**

10 RELIANT LIFE SHARES, LLC, a California
11 Limited Liability Company,

12 Plaintiff,

13 v.

14 DANIEL B. COOPER, an individual; and
15 RICHARD D. COOPER, in his capacity as
Trustee of the 2010 Irrevocable Trust of BBC,

16 Defendants.

Case No.: BC604858
Unlimited Civil

ASSIGNED FOR ALL PURPOSES TO
JUDGE SHIRLEY K. WATKINS
IN DEPT. T

**PROPOSED ORDER GRANTING
RECEIVER CHRISTOPHER CONWAY'S
EMERGENCY APPLICATION FOR
SALE OF POLICY**

Ex Parte Hearing

Date: October 23, 2023
Time: 8:30 a.m.
Dept. T

Complaint filed: December 21, 2015

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22 AND RELATED CROSS-ACTIONS
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1 Receiver Christopher Conway came before this Court on October 23, 2023 for an Ex Parte
2 Emergency Application seeking certain relief from this Court, and the Court, having reviewed the
3 Application, having heard the argument of counsel, and being otherwise duly advised, hereby finds
4 as follows:

5 **IT IS HEREBY ORDERED AND ADJUDGED:**

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- 7 a) The Receiver is granted approval to sell the [REDACTED] Policy ~~free and clear of any interests~~
8 in order to generate necessary funds to protect the Receivership Assets and prevent the
9 remaining policies in the Portfolio from lapsing;
- 10 b) The Receiver has the authority to direct the insurance carrier, Nassau Life Insurance
11 Company, to process any change forms or other forms necessary to the transaction within
12 72 hours or 3 business days of receipt of the same;
- 13 c) The Receiver is authorized to use approximately \$675,000 of the proceeds to pay premiums
14 for policies in grace and/or prevent any policies from going into grace or lapsing prior to
15 November 30, 2023; and
- 16
- 17 d) The Receiver is authorized to have the remaining sales proceeds deposited into an interest-
18 bearing account opened by Receiver, ~~and to use such funds to pay reasonable and necessary~~
19 ~~business operating expenses as outlined in the Full Receivership Order, and the prior orders~~
20 of this Court.

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22 **IT IS SO ORDERED.**

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24 Dated this 25th day of October, 2023.



A handwritten signature in black ink, appearing to read "Shirley K. Watkins", is written over a horizontal line.

Shirley K. Watkins / Judge

Honorable Shirley K. Watkins

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PROOF OF SERVICE
STATE OF CALIFORNIA, COUNTY OF ORANGE

I am employed in the County of Orange, State of California. I am over the age of 18 and not a party to the within action. My business address is 400 Spectrum Center Drive, Suite 1700, Irvine, CA 92618.


On October 23, 2023, I served the foregoing document described as:
[PROPOSED] ORDER GRANTING RECEIVER CHRISTOPHER CONWAY’S EMERGENCY APPLICATION FOR SALE OF POLICY
on the interested parties listed below in the manner prescribed below:

<p>L. Richard Walton, Esq. Walton & Walton, LLP 4640 Admiralty Way Fifth Floor Marina del Rey, California 90292 Tel: 310-496-5835 Fax: 310-464-3057 Email: rwalton@taxtriallawyers.com Attorneys for Plaintiff and Cross-Defendant, RELIANT LIFE SHARES, LLC</p>	<p>Christopher Moore Stevens, Esq. 1010 Wilshire Boulevard Suite 1011 Los Angeles, California 90017 Tel: 310-990-0459 Fax: 213-289-1925 Email: cms@cmoorestevens.com Attorneys for Cross-Defendants, SCOTT GRADY AND AMERICAN LIFE SHARES, INC.</p>
<p>Timothy W. Fredricks, Esq. Jared M. Ahern, Esq. Winget Spadafora Schwartzberg LLP 1900 Avenue of the Stars Suite 450 Los Angeles, California 90067 Tel: 310-836-4800 Fax: 310-836-4801 Email: fredricks.t@wssllp.com Attorneys for Judgment Debtors, SEAN MICHAELS AND PB CONSULTING, LLC</p>	<p>Joshua P. Friedman, Esq. Joshua P. Friedman and Associates 23679 Calabasas Road Suite 377 Calabasas, California 91302 Tel: 310-278-8600 Fax: 310-388-5421 Email: jfriedman@jpfassociates.com Attorneys Cross-Defendant, SEAN MICHAELS</p>
<p>Kyle Roehler, Esq. Foland, Wickens, Roper, Hofer & Crawford, PC 1200 Main St., Suite 2200 Kansas City, Missouri 64105 Tel: 816-472-7474; 816-460-2837 Mobile: 816-260-5540 Fax: 816-472-6262 Email: kroehler@fwplaw.com Attorneys for Plaintiff and Cross-Defendant, RELIANT LIFE SHARES, LLC</p>	<p>Daniel A. Solitro, Esq. LOCKE LORD, LLP 300 South Grand Avenue, Suite 2600 Los Angeles, CA 90071 Tel: (213) 687-6747 Fax: (213) 341-6747 Email: DSolitro@lockelord.com Email: BCasey@lockelord.com Email: Ana.Chairez@lockelord.com Attorney for Plaintiff and Cross-Defendant, RELIANT LIFE SHARES, LLC</p>
<p>Michael Goch Law Offices of Michael Goch 5850 Canoga Avenue, Suite 400 Woodland Hills, CA 91367-6554 (818) 710-7190 FAX (818) 710-7191 E-MAIL: gochmichael@aol.com Attorneys for Cooper Defendants</p>	<p>Tikran Babayan Ramond Babaian Valiant Law 800 Ferrari Lane, Suite 100 Ontario, CA 91764 Main 909.677.2270 Fax 909.677.2290 Email: TB@valiantlaw.com Email: rb@valiantlaw.com</p>

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XX **BY ELECTRONIC MAIL:** By attaching an electronic copy of the document listed above to the email addresses listed above.

XX **STATE:** I declare under penalty of perjury under the laws of the State of California that the foregoing is true and correct.
Executed on October 23, 2023, at Irvine, California.



Halai Hashimi