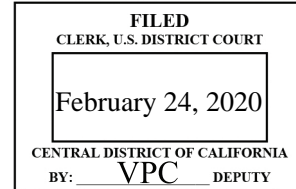


1 ALLEN MATKINS LECK GAMBLE  
MALLORY & NATSIS LLP  
2 DAVID R. ZARO (BAR NO. 124334)  
TIM C. HSU (BAR NO. 279208)  
3 865 South Figueroa Street, Suite 2800  
Los Angeles, California 90017-2543  
4 Phone: (213) 622-5555  
Fax: (213) 620-8816  
5 E-Mail: dzaro@allenmatkins.com  
thsu@allenmatkins.com



6 ALLEN MATKINS LECK GAMBLE  
MALLORY & NATSIS LLP  
7 EDWARD G. FATES (BAR NO. 227809)  
8 One America Plaza  
600 West Broadway, 27th Floor  
9 San Diego, California 92101-0903  
Phone: (619) 233-1155  
10 Fax: (619) 233-1158  
E-Mail: tfates@allenmatkins.com

11 Attorneys for Receiver  
12 WILLIAM J. HOFFMAN

13 UNITED STATES DISTRICT COURT  
14 CENTRAL DISTRICT OF CALIFORNIA  
15 WESTERN DIVISION

16 SECURITIES EXCHANGE  
COMMISSION,

17 Plaintiff,

18 v.

19 NATIONWIDE AUTOMATED  
20 SYSTEMS, INC.; JOEL GILLIS; and  
EDWARD WISHNER,

21 Defendants,

22 OASIS STUDIO RENTALS, LLC;  
23 OASIS STUDIO RENTALS #2, LLC; and  
24 OASIS STUDIO RENTALS #3, LLC,

25 Relief Defendants.

Case No. CV-14-07249-SJO (FFMx)

XXXXXXXXX  
[PROPOSED] ORDER APPROVING  
MOTION FOR DISCHARGE OF  
RECEIVER AND APPOINTMENT  
OF SUCCESSOR RECEIVER

Date: March 9, 2020  
Time: 10:00 a.m.  
Ctrm: 10C  
Judge: Hon. S. James Otero

1 The Court having considered the Motion for Discharge of Receiver and  
2 Appointment of Successor Receiver ("Motion") of William J. Hoffman of Trigild,  
3 Inc. ("Receiver"), the Court-appointed permanent receiver for Nationwide  
4 Automated Systems, Inc., Oasis Studio Rentals, LLC, Oasis Studio Rentals #2,  
5 LLC, Oasis Studio Rentals #3, LLC, and their subsidiaries and affiliates  
6 ("Receivership Entities"), and good cause appearing therefor, hereby orders as  
7 follows:

8 1. The Motion is granted.

9 2. William J. Hoffman is discharged of all duties and responsibilities as  
10 receiver in this action. Pursuant to the discharge, Mr. Hoffman is released from any  
11 and all claims and liabilities associated with the receivership, the Receivership  
12 Entities, and the individual defendants named in this action.

13 3. All actions taken by Mr. Hoffman in preserving, managing, and  
14 administering the receivership estate were consistent with the powers and duties  
15 assigned to the receiver under the Court's Orders; accordingly, all actions taken by  
16 Mr. Hoffman in performing his Court-ordered duties are approved and ratified.

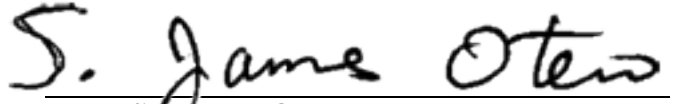
17 4. Mr. Hoffman is hereby discharged from all further duties and  
18 responsibilities relating to the receivership without any further liability or obligation  
19 or responsibility for payment of liabilities of the Receivership Entities, Mr. Hoffman  
20 being entitled to those immunities and liability protections traditionally accorded to  
21 court-appointed receivers who have acted within the scope of the Court's delegated  
22 authorities.

23 5. Aaron J. Kudla is appointed permanent receiver for the Receivership  
24 Entities, with all duties, authorities, and responsibilities of the receiver as provided  
25 in the Court's Preliminary Injunction and Orders (1) Freezing Assets; (2) Prohibiting  
26 the Destruction of Documents; (3) Requiring Accountings; and (4) Appointing a  
27 Receiver ([Dkt. 42](#)) and subsequent Orders of the Court pertaining to the receivership  
28

1 and the administration of the receivership estate. Mr. Kudla shall immediately  
2 assume and continue the work of the receiver pursuant to the Court's Orders.

3 6. Mr. Kudla is authorized to continue use of the professionals previously  
4 engaged to assist Mr. Hoffman, including the staff at Trigild, Inc., the law firm of  
5 Allen Matkins as legal counsel, and the CPA firm of Duffy Kruspodin & Company  
6 as tax accountants.

7 February 24, 2020  
8 Dated: \_\_\_\_\_

  
9 Hon. S. James Otero  
10 Judge, United States District Court

11  
12  
13  
14  
15  
16  
17  
18  
19  
20  
21  
22  
23  
24  
25  
26  
27  
28