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11 Attorneys for Court-Appointed Receiver
12 KRISTA L. FREITAG

13 UNITED STATES DISTRICT COURT
14 CENTRAL DISTRICT OF CALIFORNIA

15
16 SECURITIES AND EXCHANGE
COMMISSION,

17 Plaintiff,

18 vs.

19 INTEGRATED NATIONAL
20 RESOURCES, INC. dba
WEEDGENICS, ROLF MAX
21 HIRSCHMANN aka "MAX
BERGMANN," PATRICK EARL
22 WILLIAMS,

23 Defendants, and

24 WEST COAST DEVELOPMENT LLC,
25 INR CONSULTING LLC (WYOMING
ENTITY), OCEANS 19 INC.,
26 AUTOBAHN PERFORMANCE LLC,
ONE CLICK GENERAL MEDIA INC.,
27 OPUS COLLECTIVE, JOHN ERIC
FRANCOM, INR-CA INVESTMENT
28 HOLDINGS, LLC, MICHAEL
DELGADO, TOTAL SOLUTION
CONSTRUCTION LLC. BAGPIPE

Case No. 8:23-cv-00855-JWH-KES

**NOTICE OF MOTION AND
MOTION OF RECEIVER'S MOTION
FOR (A) APPROVAL OF SALE OF
REAL PROPERTY LOCATED AT
7691 GRACEMOOR COURT, LAS
VEGAS, NEVADA; AND (B)
AUTHORITY TO PAY BROKER'S
COMMISSION**

Date: October 18, 2024
Time: 9:00 a.m.
Ctrm: 9D
Judge: Hon. John W. Holcomb

1 HOLDINGS LLC, BAGPIPE
2 MULTIMEDIA LLC, TYLER
3 CAMPBELL, INR CONSULTING LLC
4 (CALIFORNIA ENTITY), HIDDEN
5 SPRINGS HOLDINGS GROUP LLC,
6 and ALEXANDRIA PORTER BOVEE
7 aka "AIA MONTGOMERY",

8 Relief Defendants.

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1 **TO ALL PARTIES AND THEIR COUNSEL OF RECORD:**

2 **PLEASE TAKE NOTICE** that on October 18, 2024 in Courtroom 9D of the
3 above-entitled Court, located at 350 W. 1st Street, Los Angeles, CA 90012,
4 Krista L. Freitag (“Receiver”), the Court-appointed permanent receiver for
5 Defendant Integrated National Resources, Inc., dba Weedgenics, and Relief
6 Defendants West Coast Development LLC, INR Consulting LLC (Wyoming
7 Entity), Oceans 19 Inc., Autobahn Performance LLC, One Click General Media
8 Inc., Opus Collective, INR-CA Investment Holdings, LLC, Total Solution
9 Construction LLC, Bagpipe Holdings LLC, Bagpipe Multimedia LLC, INR
10 Consulting LLC (California Entity), and Hidden Springs Holdings Group LLC, and
11 their subsidiaries and affiliates (collectively the “Receivership Entities”), will and
12 hereby does move the Court for (A) Approval of Sale of Real Property Located at
13 7691 Gracemoor Court, Las Vegas, Nevada; and (B) Authority to Pay Broker’s
14 Commission (“Motion”).

15 This Motion is based on this Notice of Motion and Motion, the attached
16 Memorandum of Points and Authorities, the concurrently filed Declaration of
17 Krista L. Freitag, the documents and pleadings already on file in this action, and
18 upon such further oral and documentary evidence as may be presented at the time of
19 hearing.

20 **Procedural Requirements:** If you oppose this Motion, you are required to
21 file your written opposition with the Office of the Clerk, United States District
22 Court, 350 W. 1st Street, Suite 4311, Los Angeles, California 90012-4565, and
23 serve the same on the undersigned not later than 21 days prior to the hearing.

24 **IF YOU FAIL TO FILE AND SERVE A WRITTEN OPPOSITION** by the
25 above deadline, the Court may grant the requested relief without further notice.

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1 This Motion is filed following the conference of counsel pursuant to Local
2 Rule 7-3, which took place on September 4, 2024.

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4 Dated: September 6, 2024

ALLEN MATKINS LECK GAMBLE
MALLORY & NATSIS LLP

By: /s/Edward G. Fates

EDWARD G. FATES
Attorneys for Court-Appointed
Receiver, KRISTA L. FREITAG

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