

1 DAVID R. ZARO (BAR NO. 124334)
E-Mail: dzaro@allenmatkins.com
2 MATTHEW D. PHAM (BAR NO. 287704)
E-Mail: mphan@allenmatkins.com
3 ALLEN MATKINS LECK GAMBLE
MALLORY & NATSIS LLP
4 865 South Figueroa Street, Suite 2800
Los Angeles, California 90017-2543
5 Phone: (213) 622-5555
Fax: (213) 620-8816

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

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

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

23 Defendants, and

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

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

**NOTICE OF MOTION AND
MOTION FOR ORDER:**

**(1) APPROVING RECEIVER'S
RECOMMENDED TREATMENT OF
CLAIMS (ALLOWED,
DISALLOWED, DISPUTED);**

**(2) APPROVING DISTRIBUTION
METHODOLOGY;**

**(3) APPROVING PROPOSED
DISTRIBUTION PLAN; AND**

**(4) APPROVING INTERIM
DISTRIBUTION.**

Date: January 16, 2026
Time: 9:00 a.m.
Ctvm: 9D
Judge: Hon. John W. Holcomb

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

5 Relief Defendants.

6

7

8

9

10

11

12

13

14

15

16

17

18

19

20

21

22

23

24

25

26

27

28

TO ALL PARTIES AND THEIR COUNSEL OF RECORD:

PLEASE TAKE NOTICE that on January 16, 2026 in Courtroom 9D of the above-entitled Court, located at 350 W. 1st Street, Los Angeles, CA 90012, Krista L. Freitag (“Receiver”), the Court-appointed permanent receiver for Defendant Integrated National Resources, Inc., dba Weedgenics, and Relief Defendants West Coast Development LLC, INR Consulting LLC (Wyoming Entity), Oceans 19 Inc., Autobahn Performance LLC, One Click General Media Inc., Opus Collective, INR-CA Investment Holdings, LLC, Total Solution Construction LLC, Bagpipe Holdings LLC, Bagpipe Multimedia LLC, INR Consulting LLC (California Entity), and Hidden Springs Holdings Group LLC, and their subsidiaries and affiliates (collectively the “Receivership Entities”), will and hereby does move the Court for Order: (1) Approving Receiver’s Recommended Treatment of Claims (Allowed, Disallowed, Disputed), (2) Approving Distribution Methodology, (3) Approving Proposed Distribution Plan, and (4) Approving Interim Distribution (“Motion”).

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

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

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

1 This Motion is filed following the conference of counsel pursuant to Local
2 Rule 7-3.

3
4 Dated: November 17, 2025

ALLEN MATKINS LECK GAMBLE
MALLORY & NATSIS LLP

By: /s/Edward G. Fates

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

5
6
7
8
9
10
11
12
13
14
15
16
17
18
19
20
21
22
23
24
25
26
27
28