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91354:2018 PG 1 of 6 JEFFERY SMITH UTAH COUNTY RECORDER 2018 Sep 24 2:10 pm FEE 34.00 BY SM RECORDED FOR DORSEY & WHITNEY LP

RECORDING REQUESTED BY AND WHEN RECORDED MAIL TO:

2 PEGGY HUNT (pro hac vice pending) 3 DORSEY & WHITNEY LLP 111 S. Main Street Suite 2100

Salt Lake City, UT 84111-2176 Telephone: (801) 933-7360 Facsimile: (801) 933-7373

Email: hunt.peggy@dorsey.com 6

THOMAS T. HWANG (218678) DORSEY & WHITNEY LLP 305 Lytton Ave.

Palo Alto, CA 94301 Telephone: (650) 857-1717 Facsimile: (650) 857-1288

Email: hwang.thomas@dorsev.com

Proposed Attorneys for Receiver R. Todd Neilson

SUPERIOR COURT OF THE STATE OF CALIFORNIA

FOR THE COUNTY OF LOS ANGELES

PROBATE DIVISION

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ANNE FARRELL, KATHERINE BLACK GARCIA, CHRISTOPHER BLACK, and DA V1D FARRELL, and each of them, as co-Trustees of the George B. and Ruth Williamson Trust as Amended and Restated April 18, 2005; DAVID and ANNE FARRELL and each of them as nominated co-Executors of the Estate of Ruth Williamson; LAURA BLACK as an individual and as an interested person as to Ruth Williamson, deceased; KATHERINE BLACK GARCIA, CHRISTOPHER BLACK, AND HENRY BLACK and each of them as co-trustees of the Laura Black 101 Trust, and ANNE FARRELL as an interested person as to Ruth Williamson, deceased.

Plaintiffs,

VS.

THOMAS D. WILLIAMSON, etc., et al.,

Defendants.

Case No. 17STPB03682 (YC071983) (Assigned to Hon. Daniel Juarez)

NOTICE OF RECEIVERSHIP

[Action filed: April 27, 2017]

NOTICE OF RECEIVERSHIP

PLEASE TAKE NOTICE OF THE FOLLOWING:

- 1. After a hearing on July 19, 2018, the Superior Court of the State of California for the County of Los Angeles, Probate Division (the "Court") entered its Order Granting Plaintiffs' Application For Order Appointing Receiver And For Preliminary Injunction on July 26, 2018 (as corrected by the [Corrected] Order Granting Plaintiffs' Application For Order Appointing Receiver And For Preliminary Injunction entered on August 16, 2018, the "Receiver Order") in the above-captioned probate proceeding, establishing a receivership.
 - 2. A true and correct copy of the Receiver Order is attached hereto as **Exhibit A**.
- 3. Under the Receiver Order, the Court appointed R. Todd Nielson (the "Receiver") as (a) temporary trustee of the purported Ruth Williamson 2011 Trust Dated August 11, 2011 and all real and personal property held in the name of such trust, and (b) Receiver to oversee, monitor and audit the operations, finances and books and records of GBW Investments, Inc., GEO Investments LLC, Meadowbrook, LLC, Hidden Lake Property, LLC, Rolling Hills, LLC and South Willow Mobilehome, LLC.
- 4. The receivership estate includes certain real property located in Utah County, Utah, commonly known as American Campground and located at <u>418 East 620 South, American Fork, UT 84003</u>, Parcel #13-052-0043.

Dated: September 4, 2018

DORSEY & WHITNEY LLP

By: 2 1-lly

Thomas T. Hwang

Proposed Counsel for the Receiver

EXHIBIT A

PEGGY HUNT (pro hac vice pending) DORSEY & WHITNEY LLP 111 S. Main Street Suite 2100 Salt Lake City, UT 84111-2176 Telephone: (801) 933-7360 Facsimile: (801) 933-7373 Email: hunt.peggy@dorsey.com

FILED Superior Court of California County of Las Angeles

AUG 1 6 2018

Sherri R. Carter, Executive Officer Clerk

By -- Statem 1- de Aliga Deputy

Sylvia De La Garza

THOMAS T. HWANG (227800) DORSEY & WHITNEY LLP 305 Lytton Ave

Palo Alto, CA 94301 Telephone: (650) 857-1717 Facsimile: (650) 857-1288

Email: hwang.thomas@dorsey.com

Proposed Attorneys for Receiver R. Todd Neilson

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SUPERIOR COURT OF THE STATE OF CALIFORNIA

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PROBATE DIVISION

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VS.

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ANNE FARRELL, KATHERINE BLACK GARCIA, CHRISTOPHER BLACK, and DAVID FARRELL, and each of them, as co-Trustees of the George B. and Ruth Williamson Trust as Amended and Restated April 18, 2005; DAVID and ANNE FARRELL and each of them as nominated co-Executors of the Estate of Ruth Williamson; LAURA BLACK as an individual and as an interested person as to Ruth Williamson, deceased; KATHERINE BLACK GARCIA, CHRISTOPHER BLACK, AND Action Filed: April 27, 2017 HENRY BLACK and each of them as cotrustees of the Laura Black 101 Trust, and ANNE FARRELL as an interested person as to Ruth Williamson, deceased,

Plaintiffs.

THOMAS D. WILLIAMSON, etc., et al.,

Defendants.

Case No. 17STPB03682 (YC071983) (Assigned to Hon. Daniel Juarez)

[CORRECTED] ORDER GRANTING PLAINTIFFS' APPLICATION FOR ORDER APPOINTING RECEIVER AND FOR PRELIMINARY INJUNCTION

Action filed: April 27, 2017 Trial Date:

Department 67

Hearing Date: July 19, 2018 Time: 8:30 a.m.

Department: 67

[CORRECTED] ORDER GRANTING PLAINTIFFS' APPLICATION FOR ORDER APPOINTING RECEIVER AND FOR PRELIMINARY INJUNCTION

<u>ORDER</u>

Plaintiffs Anne Farrell, Katherine Black Garcia, Christopher Black, Henry Black, Laura Black and David Farrell's ("Plaintiffs") Application for an Order Appointing Receiver and for Preliminary Injunction came on for hearing at 8:30 a.m. on July 19, 2018, in Department 67 of the above captioned court located at 111 N. Hill Street, Los Angeles, California 90012, the Honorable Daniel Juarez presiding.

Having read and considered the Application and supporting papers, and having heard the arguments of counsel, the Court finds, as follows:

GOOD CAUSE APPEARING THEREFOR, IT IS HEREBY ORDERED, ADJUDGED AND DECREED THAT:

Plaintiffs' Application for an Order Appointing Receiver and for Preliminary Injunction is GRANTED. As of July 26, 2018:

- (1) R. Todd Neilson is hereby appointed, pursuant to California Probate Code Section 16420, temporary trustee of the purported Ruth Williamson 2011 Trust Dated August 11, 2011 (the "Purported 2011 Trust") and all real and personal property, including, but not limited to, securities, and bank accounts, held in the name of the Purported 2011 Trust. The receiver shall have the power to bring and defend actions in his own name as receiver, keep and/or transfer possession of property of the Purported 2011 Trust, receive rents, collect debts, disburse trust funds, review pending, contemplated and/or recently closed sales and/or transfers of real property and all such powers authorized by California Code of Civil Procedure §§ 568, 568.5;
- (2) R. Todd Neilson is hereby appointed pursuant to Cal. Civ. Proc. Code Section 564 to oversee, monitor and audit the operations, finances and books and records of GBW Investments, Inc., GEO Investments LLC, Meadowbrook, LLC, Hidden Lake Property, LLC, Rolling Hills, LLC and South Willow Mobilehome, LLC (the "Entities"). The receiver shall have the power to bring and defend actions in his own name as receiver, keep and/or transfer possession of property of the Entities, receive rents, collect debts, disburse Entity funds, review pending, contemplated and/or recently closed sales and/or transfers of real property and all such powers authorized by California Code of Civil Procedure §§ 568, 568.5;

(3) Thomas Williamson shall have no authority over any real or personal property, held in the name of the Purported 2011 Trust and shall have no authority over the operations, finances and books and records of the Entities until further notice, and specifically, Mr. Williamson shall have no authority to sell, transfer, mortgage, encumber, or dispose of any of the real property held in the name of the Purported 2011 Trust or owned by the Entities; and

- (4) Thomas Williamson is hereby preliminarily enjoined, restrained and enjoined from transferring, removing, or otherwise using, encumbering, or disposing of assets (including monies) held in the name of the Purported 2011 Trust or belonging to the Entities or otherwise interfering with the discharge of the receiver's duties.
- (5) Receiver shall immediately and before performing any duties execute and file a receiver's oath, and file bond, as per Code of Civil Procedure Section 567(b) for \$1,000,000.00.
 - (6) Receiver shall file and secure his intended fees to which the parties may respond.
- (7) Receiver shall file an inventory of all property possessed under this order within 30 days after qualifying.
- (8) This Order shall supersede, relate back to and be effective as of this Court's Order Granting Plaintiffs' Application For Order Appointing Receiver And For Preliminary Injunction filed on July 26, 2018.

The parties may be heard upon a properly noticed application regarding the sufficiency of the bond ordered herein or the sufficiency of this Order appointing a receiver.

IT IS SO ORDERED.

Dated

Honorable Gus May
Los Angeles Superior Court