

WALLER LANSDEN DORTCH & DAVIS, LLP
Blake D. Roth
Ryan K. Cochran (admitted *pro hac vice*)
511 Union Street, Suite 2700
Nashville, Tennessee 37219
Telephone: 615.244.6380
Email: blake.roth@wallerlaw.com
ryan.cochran@wallerlaw.com

Counsel for the Receiver

**UNITED STATES DISTRICT COURT
DISTRICT OF NEW JERSEY**

**SECURITIES AND EXCHANGE
COMMISSION,**

Plaintiff,

v.

**DWAYNE EDWARDS; TODD BARKER;
SENIOR SOLUTIONS OF SOCIAL
CIRCLE, LLC; OXTON PLACE OF
DOUGLAS, LLC, d/b/a OXTON REAL
ESTATE OF DOUGLAS, LLC; ROME
ALF, LLC; SAVANNAH ALF, LLC;
GAINESVILLE ALF, LLC;
WATERFORD PLACE ALF, LLC;
MONTGOMERY ALF, LLC;
COLUMBUS ALF, LLC; and OPELIKA
ALF, LLC,**

Defendants,

-and-

**OXTON SENIOR LIVING, LLC; MANOR
HOUSE SENIOR LIVING, LLC; SUSAN
EDWARDS, a/k/a SUSAN ROGERS;
SHARON NUNAMAKER, a/k/a SHARON
HADDEN; and SDH DESIGN, LLC,**

Relief Defendants.

Case No. 2:17-cv-393-ES-SCM

**NOTICE OF DEFRAIN AND
MILLION'S FINAL FEE
APPLICATION FOR
COMPENSATION FOR SERVICES
RENDERED AND REIMBURSEMENT
OF COSTS AND EXPENSES
INCURRED FOR THE PERIOD
FROM APRIL 30, 2020 THROUGH
JUNE 26, 2020**

Motion Day: July 20, 2020

Objection Deadline: July 6, 2020

PLEASE TAKE NOTICE that, on July 20, 2020 at 9:00 a.m., or as soon thereafter as counsel may be heard, the undersigned will move before the Honorable Esther Salas, United States District Judge, at the United States District Court of the District of New Jersey (the “***District Court***”), Martin Luther King, Jr. Federal Building, 50 Walnut Street, Newark, NJ 07102, for the entry of the proposed *Order Approving DeFrain and Million’s Final Fee Application for Compensation for Services Rendered and Reimbursement of Costs and Expenses Incurred for the Period From April 30, 2020 Through June 26, 2020* (the “***Final DeFrain and Million Fee Order***”).

PLEASE TAKE FURTHER NOTICE that objections, if any, to the entry of the Final DeFrain and Million Fee Order (the “***Objections***”) must: (a) be made in writing; (b) set forth the name, address, telephone number, and (if applicable) an email address of the objecting party; (c) attach any document the Court should consider, explain the basis for the Objection, and the specific grounds for the Objection; and (d) be filed with the Clerk of the District Court located at the Martin Luther King, Jr. Federal Building, 50 Walnut Street, Newark, NJ 07102, with one paper copy clearly marked “courtesy copy” delivered to District Judge Ester Salas’s chambers located at the Martin Luther King, Jr. Federal Building, 50 Walnut Street, Newark, NJ 07102, and served upon: (i) Derek Pierce, as Receiver, c/o Ryan K. Cochran, Waller Lansden Dortch & Davis, LLP, 511 Union Street, Suite 2700, Nashville, TN 37219, and (ii) any party required to be served under any applicable Federal Rule or Local Rule, so that such Objections are actually received by the aforementioned parties not later than July 6, 2020 (the “***Objection Deadline***”). Unless an Objection is timely filed and served by the Objection Deadline, the Receiver shall request entry of the Final DeFrain and Million Fee Order.

PLEASE TAKE FURTHER NOTICE that in support of said motion, the undersigned shall rely upon the (1) *Summary of DeFrain and Million's Final Fee Application for Compensation for Services Rendered and Reimbursement of Costs and Expenses Incurred for the Period From April 30, 2020 Through June 26, 2020*; (2) *DeFrain and Million's Final Fee Application for Compensation for Services Rendered and Reimbursement of Costs and Expenses Incurred for the Period From April 30, 2020 Through June 26, 2020*; and (3) proposed Final DeFrain and Million Fee Order.

PLEASE TAKE FURTHER NOTICE that no oral argument is requested, unless objection or opposition is received.

Dated this 26th day of June, 2020.

/s/ Blake D. Roth
Blake D. Roth
Ryan K. Cochran (admitted *pro hac vice*)
Waller Lansden Dortch & Davis, LLP
511 Union Street, Suite 2700
Nashville, Tennessee 37219
Telephone: 615.244.6380
Email: blake.roth@wallerlaw.com
ryan.cochran@wallerlaw.com

Counsel for the Receiver