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**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 MOTION TO
DISCHARGE RECEIVER AND TO
APPROVE FINAL ACCOUNTING**

MOTION DAY: JULY 20, 2020

**OBJECTION AND OPPOSITION
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 Discharging Receiver and Approving Final Accounting* (the “*Discharge Order*”).

PLEASE TAKE FURTHER NOTICE that objections, if any, to the *Motion to Discharge Receiver and Approve Final Accounting* (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 Discharge Order.

PLEASE TAKE FURTHER NOTICE that in support of said motion, the undersigned shall rely upon the (1) *Brief in Support of Receiver’s Motion to Discharge Receiver and to*
4819-5037-1510

Approve Final Accounting filed simultaneously herewith, and (2) proposed *Order Discharging Receiver and Approving Final Accounting*.

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
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