

IN THE CIRCUIT COURT OF THE STATE OF OREGON
FOR THE COUNTY OF LANE

In re Judicial Dissolution of,

Zadeh Kicks LLC dba Zadeh Kicks

the Petitioner.

Case No. 22CV16510

ORDER APPROVING FRAUDULENT
CONVEYANCE ACTIONS

Judge Erin A. Fennerty

Receiver David P. Stapleton's ("Receiver") Motion for Order Approving Agreement for Bulk Sales and to Pursue Fraudulent Conveyance Actions (the "Motion") came before the Court for hearing on March 14, 2022. Joseph Mabe of Slinde Nelson appeared for Zadeh Kicks, Oren Bitan of Buchalter appeared for Receiver, Timothy Conway of Tonkon Torp LLP appeared for Lead Bank, Brandy Sargent of K&L Gates LLP appeared for Matthew Crawford and Justin Crawford, Chester Hill of Cosgrave Vergeer Kester LLP appeared for Nextwave Funding, and Clifford Davidson of Snell & Wilmer LLP appeared for PayPal, Inc. After considering the parties' written and oral submissions, and being fully advised,

NOW, THEREFORE, IT IS HEREBY ORDERED as follows:

The Receiver's Motion is GRANTED in part and DENIED in part. The court grants authority to the Receiver to pursue actions against "net winners", including those 19 identified by the Receiver's forensic accounting as of the date of this Order, to recover amounts received through unlawful, improper, unjust, or voidable transfers. Such claw back efforts shall initially consist of demand letters to attempt to resolve claims for no more than a 10% discount. If the net winner refuses to settle, further action may be taken up to and including legal action to recover all funds that were improperly transferred to the net winner. At the request of any party that has appeared

1 in this proceeding, and subject to the recipient complying with the Stipulated Protective Order,
2 dated November 18, 2022, the Receiver shall label as "Confidential" and produce the list of 19
3 "net winners" identified by the Receiver's forensic accounting as of the date of this Order.

4 The Court denies the Receiver's proposed form of contract for wholesale bulk sales.
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7 3/28/2023 9:37:36 AM
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10 **Karrie K. McIntyre, Circuit Court Judge**

For the Hon. E. Fennerty

11 SUBMITTED BY:

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CERTIFICATE OF READINESS – (UTCR 5.100)

This proposed order or judgment is ready for judicial signature because:

- ☐ 1. Each party affected by this order or judgment has stipulated to the order or judgment, as shown by each party's signature on the document being submitted.
- ☐ 2. Each party affected by this order or judgment has approved the order or judgment, as shown by each party's signature on the document being submitted or by written confirmation of approval sent to me.
- ☒ 3. I have served a copy of this order or judgment on each party entitled to service and:
- ☒ a. No objection has been served on me.
- ☐ b. I received objections that I could not resolve with a party despite reasonable efforts to do so. I have filed a copy of the objections I received and indicated which objections remain unresolved.
- ☐ c. After conferring about objections, _____ [role and name of objecting party] agreed to independently file any remaining objection.
- ☐ 4. Service is not required pursuant to subsection (3) of this rule, or by statute, rule, or otherwise.
- ☐ 5. This is a proposed judgment that includes an award of punitive damages and notice has been served on the Director of Crime Victims' Assistance Section as required by subsection (5) of this rule.
- ☐ 6. Other: _____.

DATED this 22nd day of March, 2023.

s/ Daniel P. Larsen
Daniel P. Larsen, OSB No. 943645

CERTIFICATE OF SERVICE

I hereby certify that I served the foregoing ORDER APPROVING FRAUDULENT CONVEYANCE ACTIONS on the parties listed below by the method(s) indicated and on the attached Special Notice List via email on the date set forth below:

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DATED this 22nd day of March, 2023.

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