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Attorneys for the Receiver for Defendants  
AEQUITAS MANAGEMENT, LLC; AEQUITAS HOLDINGS,  
LLC; AEQUITAS COMMERCIAL FINANCE, LLC;  
AEQUITAS CAPITAL MANAGEMENT, INC.; AEQUITAS  
INVESTMENT MANAGEMENT, LLC

IN THE UNITED STATES DISTRICT COURT  
FOR THE DISTRICT OF OREGON  
PORTLAND DIVISION

SECURITIES AND EXCHANGE  
COMMISSION,

Plaintiff,

v.

AEQUITAS MANAGEMENT, LLC;  
AEQUITAS HOLDINGS, LLC;  
AEQUITAS COMMERCIAL FINANCE,  
LLC; AEQUITAS CAPITAL  
MANAGEMENT, INC.; AEQUITAS  
INVESTMENT MANAGEMENT, LLC;  
ROBERT J. JESENİK, BRIAN A. OLIVER;  
and N. SCOTT GILLIS,

Defendants.

No. 3:16-cv-00438-JR

Notice of Receiver’s Motion To Abandon All  
Right, Title, and Interest In Certain Tangible  
Personal Property of Motolease Financial,  
LLC



PLEASE TAKE NOTICE OF THE FOLLOWING:

On June 21, 2022, the Receiver filed a Motion To Abandon All Right, Title, and Interest In Certain Tangible Personal Property of Motolease Financial, LLC (the "Motion") with the United States District Court for the District of Oregon---Portland Division in the above referenced matter (the "Court"). A copy of the Motion, supporting declaration and proposed order is included with this notice. If you have questions about this motion, you may reach out to the Receiver's counsel, Lawrence Ream at 206-407-1551 or lream@schwabe.com.

**YOU ARE RECEIVING THIS NOTICE BECAUSE YOUR RIGHTS MAY BE AFFECTED.**

(1) Should you choose to file a response, the deadline to submit a written response to the Receiver's Motion To Abandon All Right, Title, and Interest In Certain Tangible Personal Property of Motolease Financial, LLC [Dkt. 985] is July 20, 2022. To comply with that deadline, you must both:

(a) Serve a copy of your written response on counsel for the Receiver at:

Troy Greenfield  
Lawrence R. Ream  
SCHWABE WILLIAMSON & WYATT  
1211 SW 5<sup>th</sup> Ave., Suite 1900  
Portland, OR 97204

And

(b) File the original of your written response with the United States District Court for the District of Oregon---Portland Division, located at 1000 SW Third Ave., Portland, OR 97204.

The Receiver will thereafter file and serve his reply to the written responses on August 3, 2022.

(2) You may request oral argument by including "Request for Oral Argument" on the last line of the caption to your response.

If no timely response in opposition to the Motion is filed, the Court may enter an order granting the Motion without further notice or hearing.

Dated this 21st day of June, 2022.

Respectfully submitted,

SCHWABE, WILLIAMSON & WYATT, P.C.

By: /s/ Troy Greenfield  
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Management, LLC