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ENT 94012:2018 PG 1 of 4  
JEFFERY SMITH  
UTAH COUNTY RECORDER  
2018 Oct 01 11:01 am FEE 44.00 BY DA  
RECORDED FOR DORSEY & WHITNEY LLP

1 **RECORDING REQUESTED BY**  
2 **AND WHEN RECORDED MAIL TO:**

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17 *Proposed Attorneys for Receiver R. Todd Neilson*

18 **SUPERIOR COURT OF THE STATE OF CALIFORNIA**  
19 **FOR THE COUNTY OF LOS ANGELES**  
20 **PROBATE DIVISION**

21 ANNE FARRELL, KATHERINE BLACK )  
22 GARCIA, CHRISTOPHER BLACK, and )  
23 DAVID FARRELL, and each of them, as )  
24 co-Trustees of the George B. and Ruth )  
25 Williamson Trust as Amended and Restated )  
26 April 18, 2005; DAVID and ANNE )  
27 FARRELL and each of them as nominated )  
28 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]

1 **PLEASE TAKE NOTICE OF THE FOLLOWING:**

2 1. After a hearing on July 19, 2018, the Superior Court of the State of California for the  
3 County of Los Angeles, Probate Division (the "Court") entered its *Order Granting Plaintiffs'*  
4 *Application For Order Appointing Receiver And For Preliminary Injunction* on July 26, 2018 (as  
5 corrected by the [*Corrected*] *Order Granting Plaintiffs' Application For Order Appointing*  
6 *Receiver And For Preliminary Injunction* entered on August 16, 2018, the "Receiver Order") in the  
7 above-captioned probate proceeding, establishing a receivership.

8 2. A true and correct copy of the Receiver Order is attached hereto as **Exhibit A**.

9 3. Under the Receiver Order, the Court appointed R. Todd Nielson (the "Receiver") as  
10 (a) temporary trustee of the purported Ruth Williamson 2011 Trust Dated August 11, 2011 and all  
11 real and personal property held in the name of such trust, and (b) Receiver to oversee, monitor and  
12 audit the operations, finances and books and records of GBW Investments, Inc., GEO Investments  
13 LLC, Meadowbrook, LLC, Hidden Lake Property, LLC, Rolling Hills, LLC and South Willow  
14 Mobilehome, LLC.

15 4. The receivership estate includes certain real property located in Utah County, Utah,  
16 commonly known as Ivory Ridge House and located at **491 East 3375 North, Lehi, Utah 84043**,  
17 Parcel #40-448-0215.

18 Dated: September 19, 2018

**DORSEY & WHITNEY LLP**

19  
20 By: 

21 \_\_\_\_\_  
22 Thomas T. Hwang  
23 Proposed Counsel for the Receiver  
24  
25  
26  
27  
28

# EXHIBIT A

1835129

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15 *Proposed Attorneys for Receiver R. Todd Neilson*

**FILED**  
Superior Court of California  
County of Los Angeles

**AUG 16 2018**  
Sherril R. Carter, Executive Officer/Clerk  
By Sylvia De La Garza, Deputy

**SUPERIOR COURT OF THE STATE OF CALIFORNIA**  
**FOR THE COUNTY OF LOS ANGELES**  
**PROBATE DIVISION**

14 ANNE FARRELL, KATHERINE BLACK )  
15 GARCIA, CHRISTOPHER BLACK, and )  
16 DAVID FARRELL, and each of them, as )  
17 co-Trustees of the George B. and Ruth )  
18 Williamson Trust as Amended and Restated )  
19 April 18, 2005; DAVID and ANNE )  
20 FARRELL and each of them as nominated )  
21 co-Executors of the Estate of Ruth )  
22 Williamson; LAURA BLACK as an )  
23 individual and as an interested person as to )  
24 Ruth Williamson, deceased; KATHERINE )  
25 BLACK GARCIA, CHRISTOPHER )  
26 BLACK, AND Action Filed: April 27, 2017 )  
27 HENRY BLACK and each of them as co- )  
28 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)

**[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

1 ORDER

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

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

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

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

13 (1) R. Todd Neilson is hereby appointed, pursuant to California Probate Code  
14 Section 16420, temporary trustee of the purported Ruth Williamson 2011 Trust Dated August 11,  
15 2011 (the "Purported 2011 Trust") and all real and personal property, including, but not limited to,  
16 securities, and bank accounts, held in the name of the Purported 2011 Trust. The receiver shall have  
17 the power to bring and defend actions in his own name as receiver, keep and/or transfer possession  
18 of property of the Purported 2011 Trust, receive rents, collect debts, disburse trust funds, review  
19 pending, contemplated and/or recently closed sales and/or transfers of real property and all such  
20 powers authorized by California Code of Civil Procedure §§ 568, 568.5;

21 (2) R. Todd Neilson is hereby appointed pursuant to Cal. Civ. Proc. Code Section 564 to  
22 oversee, monitor and audit the operations, finances and books and records of GBW Investments, Inc.,  
23 GEO Investments LLC, Meadowbrook, LLC, Hidden Lake Property, LLC, Rolling Hills, LLC and  
24 South Willow Mobilehome, LLC (the "Entities"). The receiver shall have the power to bring and  
25 defend actions in his own name as receiver, keep and/or transfer possession of property of the Entities,  
26 receive rents, collect debts, disburse Entity funds, review pending, contemplated and/or recently  
27 closed sales and/or transfers of real property and all such powers authorized by California Code of  
28 Civil Procedure §§ 568, 568.5;

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

6 (4) Thomas Williamson is hereby preliminarily enjoined, restrained and enjoined from  
7 transferring, removing, or otherwise using, encumbering, or disposing of assets (including monies)  
8 held in the name of the Purported 2011 Trust or belonging to the Entities or otherwise interfering  
9 with the discharge of the receiver's duties.

10 (5) Receiver shall immediately and before performing any duties – execute and file a  
11 receiver's oath, and file bond, as per Code of Civil Procedure Section 567(b) for \$1,000,000.00.

12 (6) Receiver shall file and secure his intended fees to which the parties may respond.

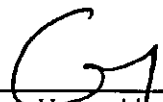
13 (7) Receiver shall file an inventory of all property possessed under this order within  
14 30 days after qualifying.

15 (8) This Order shall supersede, relate back to and be effective as of this Court's *Order*  
16 *Granting Plaintiffs' Application For Order Appointing Receiver And For Preliminary Injunction*  
17 filed on July 26, 2018.

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

20  
21 **IT IS SO ORDERED.**

22  
23  
24 Dated: 8/16/18

25   
26 Honorable Gus May  
27 Los Angeles Superior Court  
28