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

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*Proposed Attorneys for Receiver R. Todd Neilson*

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

ANNE FARRELL, KATHERINE BLACK  
GARCIA, CHRISTOPHER BLACK, and  
DA VID FARRELL, and each of them, as  
co-Trustees of the George B. and Ruth  
Williamson Trust as Amended and Restated  
April 18, 2005; DAVID and ANNE  
FARRELL and each of them as nominated  
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]

12932041  
02/11/2019 11:10 AM \$39.00  
Book - 10751 Pg - 8042-8053  
RASHELLE HOBBS  
RECORDER, SALT LAKE COUNTY, UTAH  
DORSEY & WHITNEY  
136 S MAIN ST STE 1000  
SLC UT 84101  
BY: TLA, DEPUTY - MA 12 P.

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. A true and correct copy of the Order Granting Petition to Appoint Ancillary Receiver  
10 and Give Effect to California Receivership Order is attached hereto as **Exhibit B**.

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

17 5. The receivership estate includes certain real property located in Salt Lake County,  
18 Utah, commonly known as Hyland Village and located at **1321 East 3300 South, Salt Lake City,**  
19 **Utah 84106**, Parcel #16-29-431-006-0000.

Parcel Number	Legal Description
16-29-431-006-0000	BEG 169.29 FT E FR SE COR BLK 27 TEN AC PLAT A BIG FIELD SUR N 14 RDS E 103.29 FT S 14 RDS W 103.29 FT TO BEG. 5047-822 5296-1503 5408-2461 7668-1267 7681-1123 8249-8445 9277-4210 9280-4120 9426-4273 10409-8051

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Dated: January 31, 2019.

**DORSEY & WHITNEY LLP**

By: *Thomas T. Hwang*  
Thomas T. Hwang  
Counsel for the Receiver

A Notary Public or other officer completing this certificate verifies only the identity of the individual who signed the document to which this certificate is attached, and not the truthfulness, accuracy, or validity of that document.

State of California            )  
  ) ss.  
County of Santa Clara        )

SUBSCRIBED and SWORN to before me on this 31<sup>ST</sup> day of January, 2019, by Thomas T. Hwang, proved to me on the basis of satisfactory evidence to be the person who appeared before me.

*Maria A. Segovia-Fernandez*  
Notary Public



# EXHIBIT A

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*Proposed Attorneys for Receiver R. Todd Neilson*

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

ANNE FARRELL, KATHERINE BLACK )  
GARCIA, CHRISTOPHER BLACK, and )  
DAVID FARRELL, and each of them, as )  
co-Trustees of the George B. and Ruth )  
Williamson Trust as Amended and Restated )  
April 18, 2005; DAVID and ANNE )  
FARRELL and each of them as nominated )  
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 Action Filed: April 27, 2017 )  
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. )

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

**AUG 16 2018**

Sherril R. Carter, Executive Officer/Clerk  
By Sylvia De La Garza Deputy  
Sylvia De La Garza

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  
**[CORRECTED] ORDER GRANTING PLAINTIFFS'  
APPLICATION FOR ORDER APPOINTING RECEIVER  
AND FOR PRELIMINARY INJUNCTION**

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.

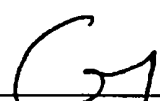
13 (7) Receiver shall file an inventory of all property possessed under this order within  
14 30 days after qualifying.

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.

21 **IT IS SO ORDERED.**

22  
23  
24 Dated: 8/16/18

25   
26 Honorable Gus May  
27 Los Angeles Superior Court

28

# **EXHIBIT B**



The Order of the Court is stated below:

Dated: January 23, 2019  
10:45:22 AM

/s/ KEITH KELLY  
District Court Judge



*Prepared and Submitted By:*

Annette W. Jarvis (#1649)  
Peggy Hunt (#6060)  
Sarah Goldberg (#13222)  
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*Attorneys for Intervenor, R. Todd Neilson, Court-Appointed Receiver*

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**IN THE THIRD JUDICIAL DISTRICT COURT  
IN AND FOR SALT LAKE COUNTY, STATE OF UTAH**

---

THOMAS D. WILLIAMSON, individually  
and as Co-Trustee of the Thomas Williamson  
101 Trust and the Sue Shreeve 101 Trust, SUE  
SHREEVE, individually and as the Co-Trustee  
of the Thomas Williamson 101 Trust and the  
Sue Shreeve 101 Trust, MICHAEL  
BRUNNER, individually and as the Trustee of  
the Patricia Brunner 101 Trust, GBW  
INVESTMENTS, INC., a California  
corporation, GEO INVESTMENTS, LLC, a  
Utah limited liability company,  
MEADOWBROOK, LLC, a Utah limited  
liability company, HIDDEN LAKE  
PROPERTY, LLC, a Utah limited liability  
company

Plaintiffs,

v.

R. TODD NEILSON, D RAY STRONG,  
BERKELEY RESEARCH GROUP, LLC, a  
foreign limited liability company, and DOES 1  
through 50

**ORDER GRANTING PETITION  
TO APPOINT ANCILLARY  
RECEIVER AND GIVE EFFECT  
TO CALIFORNIA  
RECEIVERSHIP ORDER**

Case No. 180909358

The Honorable Keith Kelly

---

R. TODD NEILSON, court-appointed  
receiver,

Intervenor.

---

The matter before the Court is the *Petition to Appoint Ancillary Receiver and Give Effect to California Receivership Order* (the "Petition") filed by R. Todd Neilson, in his capacity as the court appointed receiver (the "Receiver"). The Court held a hearing on the Petition on January 11, 2019. Annette W. Jarvis and Peggy Hunt of Dorsey & Whitney LLP appeared on behalf of the petitioner-Receiver. Vernon C. Jolley of Jolley & Jolley appeared on behalf of the Plaintiffs. Matthew L. Lalli and Zaven A. Sargsian of Snell & Wilmer LLP appeared on behalf of the Defendants.

The Court has considered the Petition, the arguments made on the record at the hearing, and the applicable law. Based thereon, the Court made detailed findings of fact and conclusions of law on the record which will be included in forthcoming findings of fact and conclusions of law.

Accordingly, for the reasons set forth on the record and for good cause showing, the Court hereby **ORDERS** that:

1. The Petition is **GRANTED**;
2. The Receiver is appointed as an ancillary receiver in this State pursuant to Utah Code Ann. § 78B-21-124.
3. The *Order Clarifying and Modifying Order Appointing Receiver and Preliminary Injunction* (the "Receivership Order") that was entered by the Superior Court of California for the County of Los Angeles on October 29, 2018, has effect in this

State.

4. The Receiver may take all actions permitted under the Receivership Order in this

State.

**Executed and entered by the Court as indicated by the stamp and seal at the top of the first page of this pleading.**

*Approved as to form:*

The proposed order was circulated to Mr. Jolley and Mr. Dudley on January 14, 2019. Neither Mr. Jolley nor Mr. Dudley responded as to whether they objected or approved as to form.

**JOLLEY & JOLLEY**

/s/

Vernon C. Jolley  
Timothy Clark Dudley  
*Attorneys for Plaintiffs*

**SNELL & WILMER LLP**

/s/ Zaven Sargsian

*(signed electronically by Sarah Goldberg with permission from Zaven Sargsian)*

Matthew L. Lalli  
Zaven Sargsian  
*Attorneys for Defendants*