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13 Attorneys for Plaintiff, Secretary,
14 United States Department of Labor

15 UNITED STATES DISTRICT COURT FOR
16 THE CENTRAL DISTRICT OF CALIFORNIA

17 R. ALEXANDER ACOSTA,
18 Secretary of Labor,
19 United States Department of Labor,

20 Plaintiff,

21 v.

22 RIVERSTONE CAPITAL LLC, a
23 California limited liability corporation;
24 NEXGEN INSURANCE SERVICES
25 INCORPORATED, a California
26 corporation; NGI BROKERAGE
27 SERVICES, INC., a California
28 corporation; JAMES C. KELLY, an
individual; TRAVIS O. BUGLI, an
individual; ROBERT CLARKE, an
individual; and ERIK MANQUEROS,
an individual.

Defendants.

) Case No. 19-cv-778-MWF (MAAx)

) **PLAINTIFF SECRETARY OF
LABOR'S NOTICE OF NON-
OPPOSITION TO INDEPENDENT
FIDUCIARY'S MOTION TO
APPROVE ITS [PROPOSED]
ORDERLY PLAN OF
LIQUIDATION AND FOR ORDER
PROVIDING ALL WRITS ACT
PROTECTION (DKT. 48)**

) **Hearing Information:**

) Date: April 29, 2019
) Time: 10:00 a.m.
) Location: Courtroom 5A, First Street
) Courthouse

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TO: THE COURT AND ALL PARTIES OF RECORD:

PLEASE TAKE NOTICE that representatives for Plaintiff R. Alexander Acosta, Secretary of Labor, United States Department of Labor (“Secretary”), have received and reviewed the Independent Fiduciary’s Notice of Motion and Motion to Approve its (Proposed) Orderly Plan of Liquidation and for Order Providing All Writs Act Protection and related documents (Dkt. 48, 48-1, 48-2, 48-3, 48-4) and do not object to the requests contained therein.

Respectfully submitted,

Dated: April 1, 2019

JANET M. HEROLD
Regional Solicitor

IAN H. ELIASOPH
Counsel for ERISA

By: /s/ Grace A. Kim
GRACE A. KIM
Senior Trial Attorney

Attorneys for the Plaintiff

DECLARATION OF SERVICE

I, the undersigned declarant, hereby say:

1. I am over the age of 18 years and am not a party to this litigation.
2. I am employed in the Office of the Solicitor and am an attorney of record herein for the U.S. Department of Labor.
3. On the date indicated below, I caused to be served a true and correct copy of the attached **PLAINTIFF SECRETARY OF LABOR'S NOTICE OF NON-OPPOSITION TO INDEPENDENT FIDUCIARY'S MOTION TO APPROVE ITS [PROPOSED] ORDERLY PLAN OF LIQUIDATION AND FOR ORDER PROVIDING ALL WRITS ACT PROTECTION (DKT. 48)** by depositing in a U.S. Postal Service mail box located in Los Angeles, California, a copy thereof in a sealed, postage-paid envelope addressed to:

Riverstone Capital, LLC
c/o Travis O. Bugli
11311 Queensbury Drive
Bakersfield, CA 93312
buglitravis@gmail.com

NexGen Insurance Services, Inc.
c/o Travis O. Bugli
11311 Queensbury Drive
Bakersfield, CA 93312
buglitravis@gmail.com

NGI Brokerage Services, Inc.
c/o Travis O. Bugli
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James C. Kelly
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James_C_Kelly@yahoo.com

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Erik Manqueros
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4. This Declaration was duly executed in Los Angeles, California, on the date indicated below.

I have read this Declaration and hereby say, under penalty of perjury, that this Declaration is true and correct.

Dated: April 1, 2019

/s/ Grace A. Kim

Grace A. Kim
Declarant