DISTRICT COURT, DENVER COUNTY, STATE OF COLORADO

Denver District Court 1437 Bannock St.

Denver, CO 80202

DATE FILED

December 9, 2024 5:19 PM FILING ID: 5447FFEABE115 CASE NUMBER: 2019CV33770

Plaintiff: TUNG CHAN, Securities Commissioner for the

State of Colorado

v.

Defendants: MARK RAY; REVA STACHNIW; CUSTOM CONSULTING & PRODUCT SERVICES, LLC; RM FARM & LIVESTOCK, LLC; MR CATTLE PRODUCTION SERVICES, LLC; SUNSHINE ENTERPRISES; UNIVERSAL HERBS, LLC; DBC LIMITED, LLC

▲ COURT USE ONLY ▲

Attorneys for Court-appointed Receiver Gary Schwartz:

John A. Chanin, #20749

Katherine A. Roush, #39267

FOSTER GRAHAM MILSTEIN & CALISHER, LLP

360 South Garfield Street, Suite 600

Denver, Colorado 80209 Phone: (303) 333-9810 Fax: (303) 333-9786

Email: jchanin@fostergraham.com;

kroush@fostergraham.com

Case Number: 19CV33770

Division/Courtroom: 209

NOTICE OF SECOND INTERIM DISTRIBUTION

Gary Schwartz, the duly-appointed receiver ("Receiver") for all of the assets of Mark Ray ("Ray"), Custom Consulting & Product Services, LLC ("Custom Consulting"), MR Cattle Production Services, LLC ("MR Cattle"), Universal Herbs, LLC ("UH"), DBC Limited, LLC ("DBC"), RM Farm & Livestock, LLC ("RM Farm"), Sunshine Enterprises ("Sunshine") and the real property, equipment, supplies or inventory located at 12700 E. Lone Chimney Road, Glencoe, OK 74032 that are in the name of or under the control of Reva Stachniw ("Glencoe Ranch")

(collectively "Ray and the Ray Entities" or the "Estate"), submits this Notice of Second Interim

Distribution and states as follows.

On June 29, 2023, the Court granted the Receiver's motion to approve the Amend Plan of

Distribution (the Plan). That Plan contemplated subsequent distributions of Estate assets to the

claimants as set forth in the Plan. The Order approving the Plan provides: "The Receiver is

authorized to make further and/or final distributions under the Amended Plan without further

notice to parties in interest or order from the Court."

Notwithstanding the Court Order, the Receiver hereby provides notice to all parties in

interest that he intends to make the distributions under the approved "rising tide" methodology as

set forth on Exhibit A, for a total interim distribution of \$967,800.

If any party in interest has any objection to this proposed second interim distribution, that

party must file its objection by December 30, 2024.

Respectfully submitted this 9th day of December, 2024.

FOSTER GRAHAM MILSTEIN & CALISHER, LLP

By: /s/ John A. Chanin

John A. Chanin, #20749

Katherine A. Roush, #39267

Attorneys for Receiver Gary Schwartz

CERTIFICATE OF SERVICE

The undersigned hereby certifies that on December 9, 2024 a true and correct copy of the foregoing was served via *Colorado Courts E-filing* upon all parties of record.

By: <u>/s/ Lucas Wiggins</u>

Lucas Wiggins, Paralegal