



April 21, 2021

OPPOSITION TO DOCKET #591

Honorable Judge Fitzwater
1100 Commerce Street
Room 1358
Dallas, Texas 75242

Re: Civil Action No. 3:16-cv-01735; *SEC vs. Faulkner*

Dear Judge Fitzwater:

I represent the Jinsun State Court Plaintiffs, who have filed a Motion to Lift the Stay. See docket #587. Today, the Receiver filed a Motion to Approve his Settlement with Rothstein Kass (the "Motion"), which states that it is unopposed. See docket #591. The certificate of conference is inaccurate. On the contrary, my clients **strongly oppose** the Motion, as the Settlement Agreement seeks to terminate and extinguish the Jinsun State Court Plaintiffs' claims in their entirety. In fact, the Jinsun Plaintiffs and the style of their case in state court are mentioned by name in the proposed Settlement Agreement, which is now before you.

Counsel for Jinsun Plaintiffs brought this to the Receiver's attention this afternoon and he refused to amend the certificate of conference.

Please note that docket #591 is **opposed**.

Thank you for your attention to this matter.

Sincerely,
KENDALL LAW GROUP

/s/ Joe Kendall

Joe Kendall

cc: Hon. Ted B. Lyon, Jr.
Brian P. Lauten