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**IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF ARIZONA**

Securities and Exchange Commission

Plaintiff,

vs.

Jonathan Larmore, et al.,

Defendants.

Case No.: 2:23-cv-02470-DLR

JOINT NOTICE OF SETTLEMENT

(Assigned to the Hon. Douglas L. Rayes)

Pursuant to LRCiv 40.2(d), Intervenor KS StateBank ("KS StateBank") and Receiver Allen D. Applbaum ("Receiver") (collectively "the Parties") hereby give notice that they have reached the material terms of a settlement which will resolve KS StateBank's fully briefed Motion to Amend Receivership Order (Doc. 308) (the "Motion") and alleged claims against the Receivership Estate, subject to final documentation.

The Parties request a stay of this Court's consideration of the Motion and any pending deadlines affecting KS StateBank for 60 days to document and consummate the settlement and prepare any necessary filings related to the same. Good cause exists for the requested stay. The Parties will be able to conserve the Receivership Estate's, parties', and the court's resources by focusing on finalizing and effectuating the settlement.

Upon performance of the settlement, which will happen within the requested 60-day stay, the parties will promptly file a notice of dismissal/withdrawal of KS StateBank.

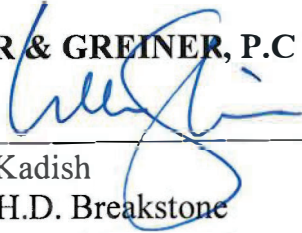
RESPECTFULLY SUBMITTED this 20th day of May, 2025.

MAY, POTENZA, BARAN & GILLESPIE, P.C.

By: /s/ Devin Sreecharana, Esq.

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CERTIFICATE OF SERVICE

I hereby certify that on May 20, 2025, I electronically transmitted the foregoing document to the Clerk's Office using the CM/ECF System for filing and transmittal of a Notice of Electronic Filing to all CM/ECF registrants:

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