

The logo for Hogan Lovells, featuring the name "Hogan Lovells" in a serif font on a yellow rectangular background.

Hogan Lovells US LLP
Columbia Square
555 Thirteenth Street, NW
Washington, DC 20004
T +1 202 637 5600
F +1 202 637 5910
www.hoganlovells.com

February 20, 2026

BY ECF

The Honorable Margo K. Brodie
United States District Judge
Eastern District of New York
United States Courthouse
225 Cadman Plaza East
Chambers: N626
Brooklyn, NY 11201

Re: *SEC v. GPB Capital Holdings, LLC, et al.*, No. 21-cv-00583 (E.D.N.Y.)

Dear Chief Judge Brodie:

We write on behalf of Joseph T. Gardemal III in his capacity as the court-appointed receiver (the “Receiver”) of GPB Capital Holdings, LLC, the GPB-managed partnerships, and certain GPB-affiliated entities in the above-referenced matter.

On February 20, 2026, the Receiver served counsel for Defendant David Gentile (“Gentile”) with a Motion to Impose Caps on the Fees and Other Costs that the Receivership Entities May Advance on Behalf of Defendant David Gentile. Attached as Exhibit A is the Receiver’s cover letter served on counsel for Gentile. In accordance with Rule 3(D) of the Court’s Individual Practices and Rules, the parties will refrain from filing the papers as to the Motion until it has been fully briefed.

Pursuant to this Court’s Order dated November 25, 2025, and Rule 3(C) of the Court’s Individual Practices and Rules, the parties have agreed, subject to this Court’s approval, to the following briefing schedule for the Motion:

- Opposition to the Receiver’s Motion: 21 days after service of the Motion; and
- Reply in Support of the Receiver’s Motion: 14 days after service of the Opposition.

If the foregoing schedule meets with the Court’s approval, we respectfully request that it be deemed the official briefing schedule for the Motion.

We thank the Court for its attention to this matter.

Respectfully submitted,

HOGAN LOVELLS US LLP

By: /s/ Douglas A. Fellman

Douglas A. Fellman

David M. Foster

Douglas S. Crosno

Hogan Lovells US LLP

555 13th Street, NW

Washington, DC 20004

douglas.fellman@hoganlovells.com

david.foster@hoganlovells.com

douglas.crosno@hoganlovells.com

cc: Chief Magistrate Judge Scanlon
Counsel of Record for Defendant Gentile



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F +1 202 637 5910
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February 20, 2026

BY EMAIL

Matthew I. Menchel, Esq.
Adriana Riviere-Badell, Esq.
Kobre & Kim LLP
201 South Biscayne Blvd., Suite 1900
Miami, FL 33131

Jacob R. Kirkham, Esq.
Kobre & Kim LLP
600 North King Street, Suite 501
Wilmington, Delaware 19801

Re: *SEC v. GPB Capital Holdings, LLC, et al.*, No. 21-cv-00583 (E.D.N.Y.)

Dear Mr. Menchel, Ms. Riviere-Badell and Mr. Kirkham:

We are counsel to Joseph T. Gardemal III in his capacity as the court-appointed receiver (the “Receiver”) of GPB Capital Holdings, LLC, the GPB-managed partnerships, and certain GPB-affiliated entities in the above-referenced matter.

We write pursuant to Rule 3(D) of Chief Judge Brodie’s Individual Rules and Practices to serve the following:¹

- Notice of the Motion to Impose Caps on the Fees and Other Costs that the Receivership Entities May Advance on Behalf of Defendant David Gentile;
- The Receiver’s Memorandum of Law in Support of the Receiver’s Motion to Impose Caps on the Fees and Other Costs that the Receivership Entities May Advance on Behalf of Defendant David Gentile;
- Declaration of Douglas S. Crosno;
- Eight (8) Exhibits in connection with the Receiver’s Motion; and

¹ In accordance with Rule 3(D), the parties also will refrain from filing the Motion papers until it has been fully briefed.

Matthew I. Menchel, Esq.
Adriana Riviere-Badell, Esq.
Jacob R. Kirkham, Esq.

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February 20, 2026

- A Proposed Order.

Very truly yours,

HOGAN LOVELLS US LLP

By: /s/ Douglas A. Fellman

Douglas A. Fellman

David M. Foster

Douglas S. Crosno

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555 13th Street, NW

Washington, DC 20004

douglas.fellman@hoganlovells.com

david.foster@hoganlovells.com

douglas.crosno@hoganlovells.com