

**UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF WISCONSIN
GREEN BAY DIVISION**

SECURITIES AND EXCHANGE
COMMISSION,

Plaintiff,

v.

Civil Action No: 09-C-506

WEALTH MANAGEMENT, LLC,
JAMES PUTMAN, and SIMONE FEVOLA,

Defendants, and

WML GRYPHON FUND, LLC;
WML WATCH STONE PARTNERS, L.P.; WML
PANTERA PARTNERS, L.P.; WML PALISADE
PARTNERS, L.P.; WML L3, LLC;
WML QUETZAL PARTNERS, L.P., and
EMPLOYEE SERVICES OF APPLETON, INC.,

Relief Defendants.

DECLARATION OF STEPHANIE MELNICK

I, Stephanie L. Melnick, declare:

1. I am an attorney with the law firm Melnick & Melnick, S.C. I am one of the attorneys acting as counsel to the plaintiffs in *WML Gryphon Fund, LLC, et al. v. Wood, Hat & Silver, LLC, et al.*, Case No. 12-CV-1704, in the Circuit Court for Outagamie County, Wisconsin (the “Outagamie County action”).
2. Attached here as Exhibit A is a copy of the Complaint that the plaintiffs in the Outagamie County action filed on December 11, 2012.
3. Attached here as Exhibit B is a copy of the First Amended Complaint that the plaintiffs in the Outagamie County action filed on October 30, 2014.

4. Currently, two claims remain pending against The Lincoln National Life Insurance Company (“Lincoln”) in the Outagamie County action. These claims allege unjust enrichment and a Wisconsin antitrust violation related to Lincoln’s sale of life insurance policies that The Baetis Fund, L.P. or The Brown Investment Fund, L.P. financed with non-recourse premium finance loans and sales of same on the secondary market for life insurance.

5. Attached here as Exhibit C is a copy of an affidavit that I filed in the Outagamie County action on October 14, 2013.

6. Attached here as Exhibit D is a copy of an affidavit that I filed in the Outagamie County action on October 5, 2015.

7. Attached here as Exhibit E is a copy of a motion that the plaintiffs in the Outagamie County action filed on October 13, 2015.

8. Attached here as Exhibit F is a copy of an affidavit that I filed in the Outagamie County action on October 31, 2018.

9. Attached here as Exhibit G is a copy of a motion that the plaintiffs in the Outagamie County action filed on October 31, 2018.

10. Attached here as Exhibit H is a copy of a brief that Lincoln filed in the Outagamie County action on November 13, 2018.

11. Attached here as Exhibit I is a copy of a brief that the plaintiffs in the Outagamie County action filed on November 19, 2018.

12. Although in January 2019, Lincoln expressed willingness to produce a witness in response to Plaintiffs’ notice, the deposition has not yet occurred or been scheduled.

13. Attached here as Exhibit J is a copy of a Stipulation and Order Amending Scheduling Order that the parties to the Outagamie County action filed on March 11, 2019, and that the Circuit Court for Outagamie County entered the following day.

14. Attached here as Exhibit K is a copy of a brief filed by AXA Equitable Life Insurance Company, one of Lincoln's co-defendants in the Outagamie County action, on March 27, 2019. Lincoln joined in this motion.

15. On April 10, the Outagamie County court orally denied the movants' request for a general stay, but agreed to stay the court-ordered mediation, as well as to stay the deposition of the Receiver, pending a status conference scheduled for September 10, 2019.

I declare under penalty of perjury under the laws of the United States of America that the foregoing is true and correct.

Executed this 12th day of April, 2019.



Stephanie L. Melnick