

Respectfully submitted,

By: /s/ Charlene C. Koonce

Cortney C. Thomas

Texas Bar No. 24075153

cort@brownfoxlaw.com

Charlene C. Koonce

Texas Bar No. 11672850

charlene@brownfoxlaw.com

Timothy B. Wells

Texas Bar No. 24131941

tim@brownfoxlaw.com

BROWN FOX PLLC

8111 Preston Road, Suite 300

Dallas, TX 75225

Tel. 214.327.5000

Fax. 214.327.5001

CERTIFICATE OF SERVICE

Pursuant to Fed. R. Civ. P. 5(d)(1)(B), as amended, no certificate of service is necessary, because this document is being filed with the Court's electronic-filing system.

/s/ Charlene C. Koonce

Charlene C. Koonce

EXHIBIT	DESCRIPTION	APP PAGES
A	Notice of proposed sales and hearing in <i>Dallas Morning News</i> on March 8 and March 12, 2023	APP000001-000002
B	Timothy Barton LinkedIn posts	APP000003-000018

EXHIBIT A

Wednesday, March 8, 2023

The Dallas Morning News

ePaper [Subscribe](#) [Sign In](#)

[Home](#) [News](#) [Business](#) [Sports](#) [Entertainment](#) [Arts & Life](#) [Opinion](#) [Obits](#) [Marketplace](#) [DMNstore](#)

[Communities](#) [Crime](#) [Education](#) [Investigations](#) [State](#) [Nation/World](#) [Politics](#) [Videos](#)



[Account Logoff](#)

NOTICE OF SALE AND HEARING CORT THOMAS, AS THE

Notice of Sale and Hearing

Cort Thomas, as the court-appointed Receiver of the assets of several entities controlled by Timothy Barton, including D4DS, LLC, D4FR, LLC, and Goldmark Hospitality LLC hereby gives notice that on March 20, 2023 at 2 p.m., the United States District Court for the Northern District of Texas will consider three property sales: the sale of 841 S. Polk Street, DeSoto, Texas for \$27,000,000; the sale of 1003 Windmill Farms Boulevard, Forney, Texas for \$51,000,000; and the sale of 13636 Goldmark Drive, Dallas, Texas for \$5,500,000. The hearing will be conducted in-person at the United States District Courthouse, Courtroom 1525, 1100 Commerce St., Dallas, TX 75242-1310. Bona fide offers which exceed the sale amount by at least 10% may be sent to the Receiver prior to the hearing by fax at 214-327-5001. For more information or for details for participating in the hearing, contact the Receiver at 214-327-5001.

Attachment 1
No Attachment Uploaded
[+ ADD](#) [? HELP](#)

Attachment 2
No Attachment Uploaded
[+ ADD](#) [? HELP](#)

Appeared in: *The Dallas Morning News* on 03/08/2023 and 03/12/2023

Printer-friendly version E-mail to a friend

[Home](#)
Powered by [myPublicNotices.com](#)

[About Us](#) | [Careers](#) | [Advertise](#) | [Subscribe](#) | [Contact Us](#) | [Privacy Policy](#) | [Terms of Service](#) | [My Account](#) | [FAQ](#)

©2019, The Dallas Morning News Inc. All Rights Reserved.

EXHIBIT B

Tim Barton replied to Hunter Beaumont's comment on this

Tim Barton • 3rd+
CEO at JMJ Development, Inc.
13h •

[+ Follow](#)

I have extended stay hotel my reciver playing inside ball not taken to market. Goldmark Hospitality Dallas TX 70 units run as long term lease Appraisal at \$7 million. Excellent teardown site for new MF 400 units as another option. Reciver dumping at 5.5 million [#hospitality](#) [#hotel](#) [#multifamily](#)

2 2 comments

Like Comment Repost Send

Add a comment...



Most relevant ▾

Hunter Beaumont • 3rd+ 13h ***
Real Estate Investment Manager, U.S. Government Contractor
Is this for sale? We would look at buying Tim Barton


Like | Reply · 1 Reply





Tim Barton Author 11h ***
CEO at JMJ Development, Inc.
Yes email me at timothy.barton@proton.me I send info




Like | Reply

 **Tim Barton** • 3rd+ [+ Follow](#) ⋮
CEO at JMJ Development, Inc.
13h • 


I have extended stay hotel my reciver playing inside ball not taken to market. Goldmark Hospitality Dallas TX 70 units run as long term lease Appraisal at \$7 million. Excellent teardown site for new MF 400 units as another option. Reciver dumping at 5.5 million [#hospitality](#) [#hotel](#) [#multifamily](#)

 2 2 comments

 Like  Comment  Repost  Send


  

Most relevant ▾

 **Hunter Beaumont** • 3rd+ 13h ⋮
Real Estate Investment Manager, U.S. Government Contractor


Is this for sale? We would look at buying Tim Barton


Like | Reply · 1 Reply


 **Tim Barton** Author 11h ⋮
CEO at JMJ Development, Inc.

Yes email me at timothy.barton@proton.me I send info


Like | Reply







Tim Barton • 3rd+
CEO at JMJ Development, Inc.
13h • 

[+ Follow](#) 


I have an extended stay operating with a long-term lease. My receiver is selling it and not taken to market. 70 units in Dallas Goldmark Hospitality appraisal \$7 million. receiver dumping at 5.5 mm super site for new build MF up to 400 units need make offer fast offer due March 18th DM or email me timothy.barton@proton.me





REAL ESTATE DEVELOPMENT FUNDING ~ The Capital Stack Forum
82,956 members

 Like  Comment  Repost  Send


Be the first to react



Tim Barton • 3rd+
CEO at JMJ Development, Inc.
14h • 





[+ Follow](#) 

I have 4 class A mf properties my reciver is selling and they are playing inside ball and did not market openly only to its insiders. one project in Forney Texas 280 units with Hud loan 40 years 3% second DeSoto Texas 150 units Hud loan also 3% If you can move fast DM as offers due by March 18th on first two. or email timothy.barton@proton.me check my post for summary information



REAL ESTATE DEVELOPMENT FUNDING ~ The Capital Stack Forum
82,956 members

1 comment

 Like  Comment  Repost  Send

Be the first to react

 **Tim Barton** • 3rd+
CEO at JMJ Development, Inc.
14h • 

[+ Follow](#) 

Reciver playing inside dealing open to market but Broker did not market. DM or email me timothy.barton@proton.me

Enoch Portfolio

Enoch Investments LLC

Multi-Family Portfolio

Parc @ Windmill Farms

Bellwether Ridge

Parc @ Ingleside

Parc @ Opelika



Page 7 of 12

 1  1 comment

 Like Comment Repost Send

Enoch Portfolio

Enoch Investments LLC Multi-Family Portfolio

Parc @ Windmill Farms



Bellwether Ridge



Parc @ Ingleside



Parc @ Opelika



Enoch Financial Summary

Enoch Investments Summary:

Enoch Investments LLC owns four multi-family properties, with an as stabilized value at \$200MM+ and net equity in the \$100MM+ range as shown in detail below. All these properties have HUD loans with 40-year, low interest, non-recourse loan, which is only provided to strong, highly experienced Sponsors.

Project Entity	Enoch % Ownership	Property Name/Address	Description/# Units	Date Opened
D4FR LLC	100%	Parc @ Windmill Farms; Forney, TX	273	November 2019
D4DS LLC	100%	Bellwether Ridge; DeSoto, TX	150	June 2019
D4IN LLC	100%	Parc @ Ingleside; Ingleside, TX	192	May 2021
D4OP LLC	100%	Parc @ Opelika; Opelika, Alabama	168	June 2022
TOTALS:			783	

Property Name/Address	Current Loan Balance	Maturity	Current NOI or HUD 1st Year Proforma	Debt Service	DSCR	Net CF
Parc @ Windmill Farms; Forney, TX	\$35,388,611	2/1/2060	\$2,950,143	\$1,688,863	1.75	\$1,261,280
Bellwether Ridge; DeSoto, TX	\$17,995,079	6/1/2059	\$1,618,664	\$854,622	1.89	\$764,042
Parc @ Ingleside; Ingleside, TX	\$25,010,224	8/1/2061	\$1,641,445	\$1,187,896	1.38	\$453,549
Parc @ Opelika; Opelika, Alabama	\$23,661,300	11/1/2062	\$1,391,224	\$1,096,767	1.27	\$294,457
TOTALS:	\$102,055,214		\$7,601,476	\$4,828,148	1.57	\$2,773,328

Property Name/Address	Stabilized NOI	DSCR on Stabilized NOI	Net CF on Stabilized NOI	Basis of Value	Value	LTV	Net Equity Value
Parc @ Windmill Farms; Forney, TX	\$3,097,650	1.83	\$1,408,787	NOI @ 4.0% Cap Rate	\$77,441,254	46%	\$42,052,643
Bellwether Ridge; DeSoto, TX	\$1,699,597	1.99	\$844,975		\$42,489,917	42%	\$24,494,838
Parc @ Ingleside; Ingleside, TX	\$2,020,423	1.70	\$832,527		\$50,510,575	50%	\$25,500,351
Parc @ Opelika; Opelika, Alabama	\$1,843,569	1.68	\$746,802		\$46,089,225	51%	\$22,427,925
TOTALS:	\$8,661,239	1.79	\$3,833,091		\$216,530,971	47%	\$114,475,757

Parc @ Windmill Farms

Parc @ Windmill Farms



- Location – Forney, Texas
- Units – 273
- Date opened – November 2019
- Current loan balance - \$35,388,611
- NOI–stabilized - \$3,097,650
- Value at 4% cap - \$77,441,254
- LTV – 46%
- Net equity value - \$42,052,643



Bellwether Ridge

Bellwether Ridge



- Location – Desoto, Texas
- Units – 150
- Date opened – June 2019
- Current loan balance - \$17,995,079
- NOI–stabilized - \$1,699,597
- Value at 4% cap - \$42,489,917
- LTV – 42%
- Net equity value - \$24,494,838



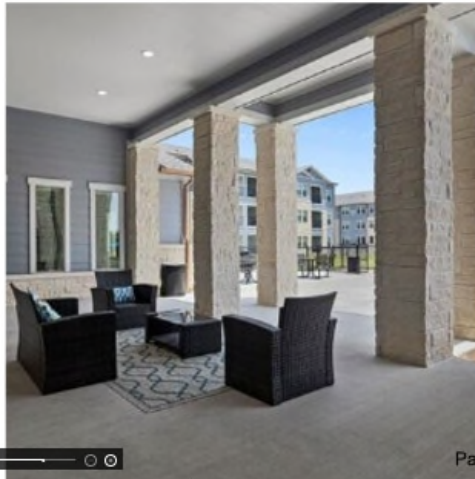
Page 10 of 12

Parc @ Ingleside

Parc @ Ingleside



- Location – Ingleside, Texas
- Units – 192
- Date opened – May 2021
- Current loan balance - \$25,010,224
- NOI–stabilized - \$2,020,423
- Value at 4% cap - \$50,510,575
- LTV – 50%
- Net equity value - \$25,500,351



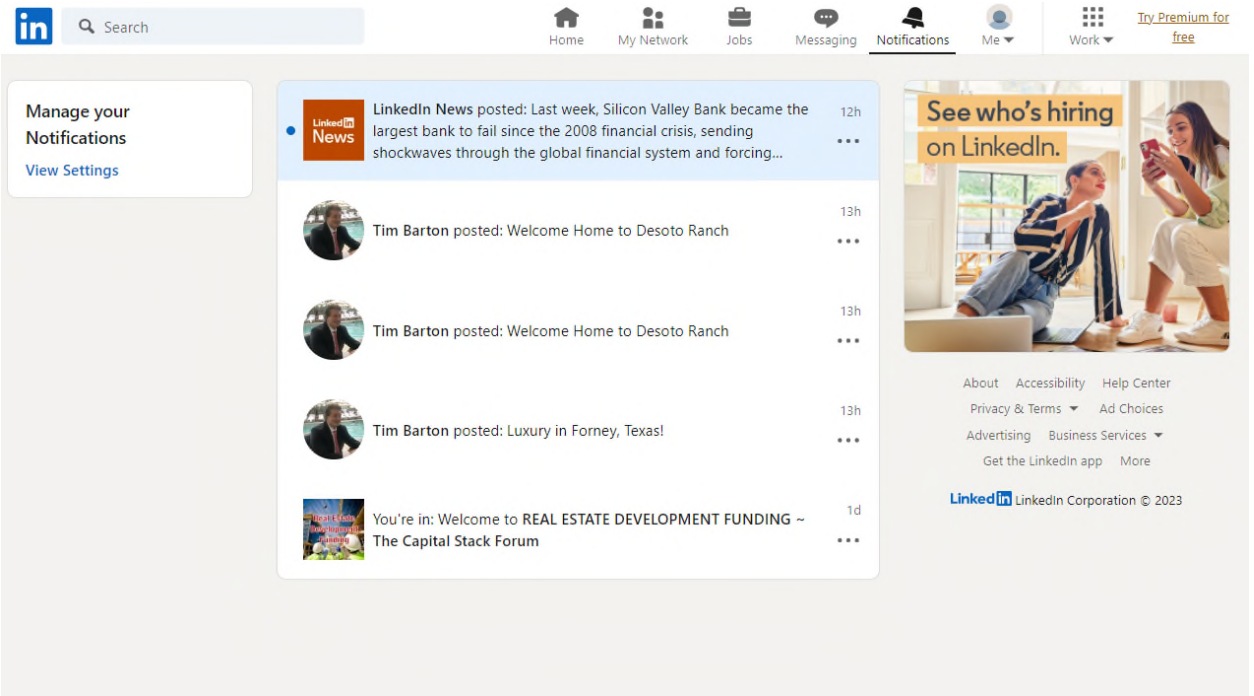
Parc @ Opelika

Parc @ Opelika



- Location – Opelika, Alabama
- Units – 168
- Date opened – June 2022
- Current loan balance - \$23,661,300
- NOI–stabilized - \$1,843,569
- Value at 4% cap - \$46,089,225
- LTV – 51%
- Net equity value - \$22,427,925

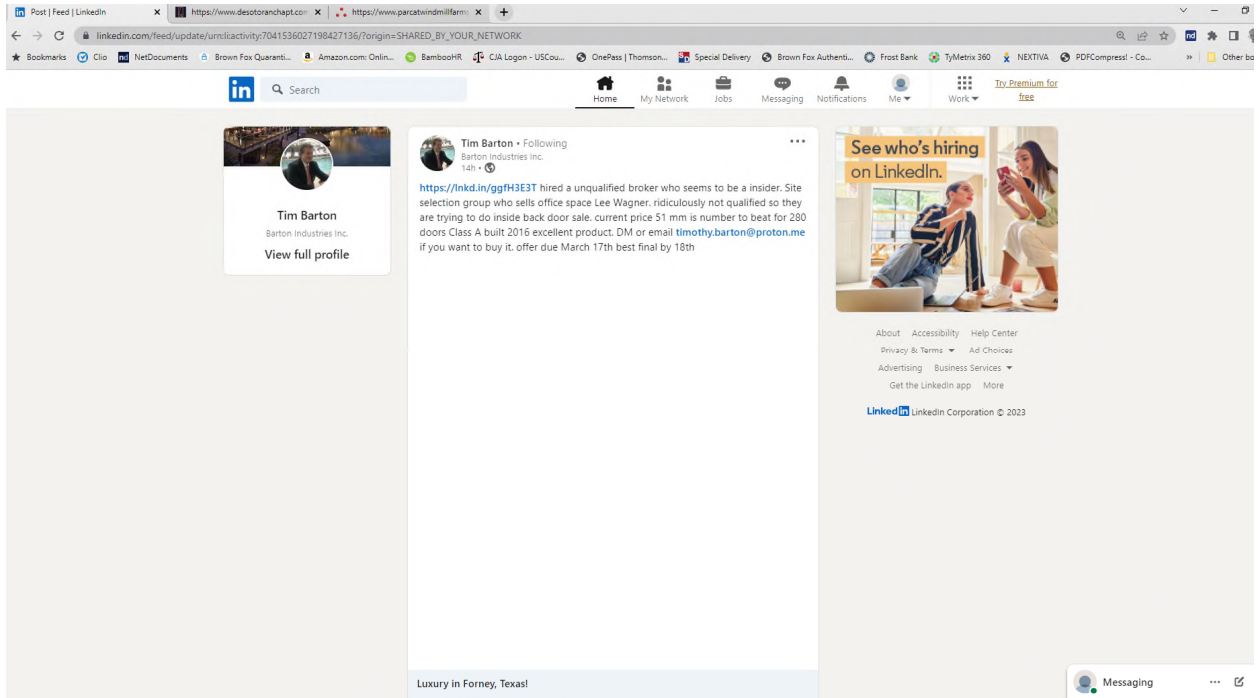




This screenshot shows the top portion of a LinkedIn home feed. At the top, there is a navigation bar with the LinkedIn logo, a search bar, and icons for Home, My Network, Jobs, Messaging, Notifications, Me, and Work. Below the navigation bar, on the left, is a 'Manage your Notifications' sidebar with a 'View Settings' link. The main feed area contains several notification items:

- A 'LinkedIn News' notification: "LinkedIn News posted: Last week, Silicon Valley Bank became the largest bank to fail since the 2008 financial crisis, sending shockwaves through the global financial system and forcing..." (12h)
- Three notifications from Tim Barton: "Tim Barton posted: Welcome Home to Desoto Ranch" (13h), "Tim Barton posted: Welcome Home to Desoto Ranch" (13h), and "Tim Barton posted: Luxury in Forney, Texas!" (13h).
- A notification: "You're in: Welcome to REAL ESTATE DEVELOPMENT FUNDING ~ The Capital Stack Forum" (1d).

On the right side of the feed, there is a promotional banner for LinkedIn hiring: "See who's hiring on LinkedIn." Below the banner are links for About, Accessibility, Help Center, Privacy & Terms, Ad Choices, Advertising, Business Services, and Get the LinkedIn app. At the bottom right of this section, it says "LinkedIn LinkedIn Corporation © 2023".



This screenshot shows a specific LinkedIn post by Tim Barton. The browser's address bar at the top shows the URL: https://www.linkedin.com/feed/update/urn:li:activity:7041536027198427136/?origin=SHARED_BY_YOUR_NETWORK. The post is from Tim Barton, who is following Barton Industries Inc. The post content is:

<https://lnkd.in/g/fH3E3T> hired a unqualified broker who seems to be an insider. Site selection group who sells office space Lee Wagner, ridiculously not qualified so they are trying to do inside back door sale. current price 51 mm is number to beat for 200 doors Class A built 2016 excellent product. DM or email timothy.barton@proton.me if you want to buy it. offer due March 17th best final by 18th

Below the post, there is a partial view of another post titled "Luxury in Forney, Texas!". On the right side, the same promotional banner for LinkedIn hiring is visible. At the bottom right, there is a "Messaging" button.

Luxury in Forney, Texas!
parcatwindmillfarms.com • 1 min read

1 comment

Like Comment Repost Send

Add a comment...

Most relevant ▾

Tim Barton Author
Barton Industries Inc. 14h ...

PARC AT WINDMILL FARMS FORNEY TX

Like | Reply

PARC AT WINDMILL FARMS

- HOME
- FLOOR PLANS
- GALLERY
- AMENITIES
- NEIGHBORHOOD
- CONTACT
- SPECIALS

(972) 472-2745

APPLY ONLINE

Page Not Found
We're sorry - the page you're looking for cannot be found. Let us help you on your way.

3D

Today's Record: 6:00AM to 6:00PM | Logout Login

Copyright © 2023 Parcat Windmill Farms. All rights reserved. Sitemap LeaseLabs

Tim Barton
Barton Industries Inc.
View full profile

Tim Barton • Following
Barton Industries Inc.
13h • 🌐

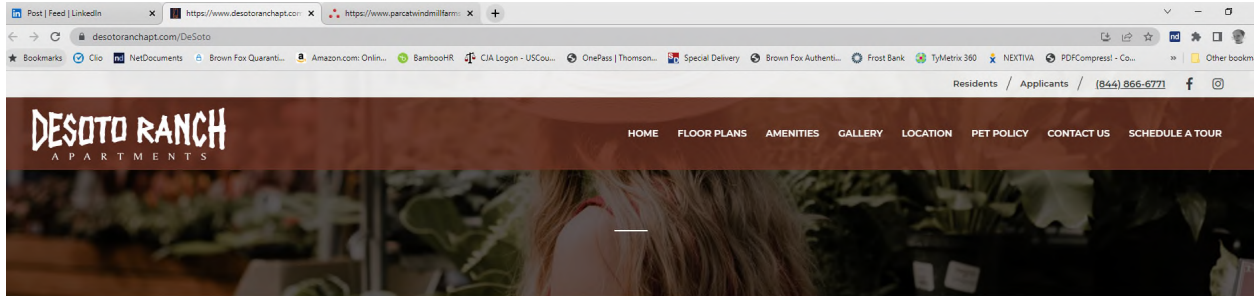
<https://lnkd.in/g5FkHvsb> ranch in DeSoto TX. Another project Reciver trying to sell without marketing to insiders. Still time to make a offer. Due by March 17th then best Final by 18th 150 units class A Hud loan 40 yr average 4% rate. built 2016 great asset DM or email me if you want to make offer timothy.barton@proton.me

Welcome Home to Desoto Ranch
desotoranchapt.com • 1 min read

👍 1

Reactions

👍 Like 💬 Comment 🔄 Repost ➦ Send



404 - Page not found

Oops, better check that URL.

Share

<p>GET IN TOUCH</p> <p>Desoto Ranch 801 S Polk St DeSoto, TX 75115</p> <p>(844) 866-6771</p>	<p>INTERESTED IN OUR PROPERTY?</p> <p>Please feel free to call us and we will reach out to you shortly! We are looking forward to hear from you</p> <p>Contact Learn More</p>	<p>LINKS</p> <p>Resident Login Applicant Login Terms and Conditions Privacy Policy Contact Us</p>
---	--	--