

**IN THE UNITED STATES DISTRICT COURT
FOR THE NORTHERN DISTRICT OF TEXAS
DALLAS DIVISION**

**SECURITIES AND EXCHANGE
COMMISSION,**

Plaintiff,

v.

No. 3:22-cv-2118-X

**TIMOTHY BARTON,
CARNEGIE DEVELOPMENT, LLC,
WALL007, LLC,
WALL009, LLC,
WALL010, LLC,
WALL011, LLC,
WALL012, LLC,
WALL016, LLC,
WALL017, LLC,
WALL018, LLC,
WALL019, LLC,
HAOQIANG FU (A/K/A MICHAEL FU),
STEPHEN T. WALL,**

Defendants,

**DJD LAND PARTNERS, LLC, and
LDG001, LLC,**

Relief Defendants.

**APPENDIX IN SUPPORT OF RECEIVER'S
FIRST QUARTERLY FEE APPLICATION**

Respectfully submitted,

RECEIVER CORTNEY C. THOMAS

/s/ Cortney C. Thomas

Cortney C. Thomas

State Bar No. 24075153

cort@brownfoxlaw.com

Brown Fox PLLC

8111 Preston Road, Suite 300

Dallas, Texas 75225

T: (214) 327-5000

F: (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.

EXHIBIT	DESCRIPTION	APP PAGES
A	Standardized Fund Accounting Report for the period October 18, 2022 through December 31, 2022	APP000001-03
B	Receiver's invoice for services provided October 18, 2022 through December 31, 2022	APP000004-28
C	Brown Fox invoice for services provided October 18, 2022 through December 31, 2022	APP000029-86
D	Ahuja & Clark invoice from for services provided October 18, 2022 through December 31, 2022	APP000087-89
E	Veracity Forensic invoice from for services provided October 18, 2022 through December 31, 2022	APP000090-94

EXHIBIT A

Timothy Barton Receivership Entities
 Civil Action No.: 3:22-CV-2118-X
 Standardized Fund Accounting Report
 As of December 31, 2022

1	Beginning Balance (October 18, 2022):		\$ 39,500.15
2	Business Income		108,460.28
3	Funds Received		819,171.90
4	Interest/Dividend Income		-
5	Business Asset Liquidation		
6	Personal Asset Liquidation		
7	Third-Party Litigation Income		
8	Miscellaneous - Other		
9	Disbursements to Investors		
10	Disbursements for Receivership Operations:		110,594.98
10a	Disbursements to Receiver or Other Professionals		
10b	Business Asset and Operating Expenses	110,594.98	
10c	Personal Asset Expenses		
10d	Investment Expenses		
10e	Third-Party Litigation Expenses		
10f	Tax Administrator Fees and Bonds		
10g	Federal and State Tax Expenses		
11	Disbursements for Distribution Expenses Paid by the Fund		-
11a	Distribution Plan Development Expenses		
11b	Distribution Plan Implementation Expenses		
12	Disbursements to Court/Other		-
	12a Court Registry Investment System (CRIS) or other banking fees related to the Fund.		
	12b Federal income taxes		
13	Ending Balance (December 31, 2022)		\$ 856,537.35
14	Ending Balance of Fund - Net Assets		856,537.35
14a	Cash & Cash Equivalents	856,537.35	
14b	Investments		
14c	Other Assets or Uncleared Funds		
15	Disbursements for Plan Administration Expenses Not Paid by the Fund		
15a	Plan Development Expenses Not Paid by the Fund		
15b	Plan Implementation Expenses Not Paid by the Fund		
15c	Tax Administrator Fees & Bonds Not Paid by the Fund		
16	Disbursements to Court/Other Not Paid by the Fund		
16a	Court Registry Investment System (CRIS) or other banking fees related to the Fund		
16b	Federal income taxes		

Timothy Barton Receivership Entities
Civil Action No.: 3:22-CV-2118-X
Standardized Fund Accounting Report
As of December 31, 2022

17 DC & State Tax Payments

18 No. of Claims

18a the number of claims received from investors during this reporting period

the number of claims received from investors as a result of all orders since the

18b inception of the Fund

19 No. of Claimants/Investors

19a the number of claimants/investors receiving distributions during the reporting period

the number of claimants/investors receiving distributions pursuant to all orders of

19b distribution since the inception of the Fund

EXHIBIT B



Brown Fox PLLC
 Emerging Department
 8111 Preston Road, Suite 300
 Dallas, Texas 75225
 Telephone: 214-327-5000
 Fax: 214-327-5001

INVOICE

Invoice # 33660
 Date: 01/20/2023

Barton Receivership

SEC v. Barton – Case Administration

Services

Date	Initials	Description	Hours	Rate	Client Total
10/18/2022	CCT	Review receivership order; telephone conference and correspondence with SEC regarding same; correspondence with R. Roper regarding same; telephone conference with counsel to M. Fu regarding same; telephone conferences with IT vendor regarding potential collection of IT assets; telephone conference with bankruptcy counsel; secure offices at 2999 Turtle Creek; telephone conferences with M. Edney (counsel to Barton) regarding same; participate in interviews with V. Barton, R. Marx, A. Marx, J. Morrelli (tenant), and V. McMurray; begin inspecting IT assets to ensure preservation of same; ensure securing of all exterior doors; meetings with counsel to discuss first days of receivership. [Time reduced from 8.3 hours]	8.00	\$385.00	\$3,080.00
10/19/2022	CCT	Continue investigation of 2999 Turtle Creek office; correspondence with M. Edney regarding non-review of privileged documents; meetings with counsel to discuss same; telephone conferences and correspondence with potential brokers and other real estate industry professional regarding needs of receivership; telephone conferences with IT vendor regarding needs of receivership; correspondence with accountant regarding potential needs of receivership; telephone conference with R. Roper; telephone conference and correspondence with potential property manager; lengthy telephone conference with lender's bankruptcy counsel regarding 2999 Turtle Creek; telephone conference with interested purchaser of assets; correspondence with U.S. Trustee's office.	7.90	\$385.00	\$3,041.50

10/20/2022	CCT	Prepare for and attend meeting with M. Edney and R. Roper to discuss first days of receivership and forthcoming list of needed information; telephone conference and correspondence with bank regarding setting up new receivership bank account; secure Rock Creek property in accordance with receivership order; meeting with locksmith for purposes of same; meeting with V. Barton regarding same; telephone conference with M. Edney regarding same; telephone conference with commercial real estate expert regarding potential paths forward; review list of Barton-controlled entities; telephone conference regarding catering equipment stored at 2999 Turtle Creek. [Time reduced from 9.1 hours]	8.00	\$385.00	\$3,080.00
10/21/2022	CCT	Meeting with Veritex to finalize new Receivership account set up; meeting with IT team at 2999 Turtle Creek; telephone conference and correspondence with potential broker regarding 4107 Rock Creek; meeting with R. Marx at 2999 Turtle Creek to discuss removal of non-JMJ attorney files; review working drafts of motion to supplement receivership order, declaration in support, and proposed order; revise same; correspondence with counsel regarding same; travel to UPS store address used as registered address for most MJJ-related entities; meeting with management at UPS Store to ensure future receivership mail secured and delivered to 8111 Preston Road.	7.60	\$385.00	\$2,926.00
10/23/2022	CCT	Continue strategizing next steps of receivership; address outstanding needs with counsel; correspondence with counsel regarding [REDACTED]; review working draft of motion to engage professionals; correspondence with C. Koonce regarding same; correspondence with receivership bank regarding new account logistics.	1.80	\$385.00	\$693.00
10/24/2022	CCT	Meeting with counsel to discuss [REDACTED]; telephone conference with S. Latham regarding [REDACTED]; correspondence with counsel to M. Fu; meeting with V. Barton to discuss credit cards and outstanding request for information; correspondence with two potential real estate advisors; telephone conference and correspondence with development advisor on	8.00	\$385.00	\$3,080.00

Venus property; telephone conference with IT vendor regarding receivership website; draft first posting for same; telephone conference with potential broker regarding valuation of apartments; record voicemail for receivership phoneline; trip to 2999 Turtle Creek to ensure secure, to gather mail, and to locate property-related documents; trip to UPS store to gather mail and to meet with store manager to discuss protocol for forwarding mail in the future; begin looking through first week's mail to identify additional creditors and banks; correspondence with clerk's office regarding Eastern District of Michigan 754 notices. [Time reduced from 9.3 hours]

10/25/2022	CCT	<p>Correspondence with counsel regarding [REDACTED]; correspondence with caterer regarding items stored at 2999 Turtle Creek; telephone conference with interested purchaser on 4107 Rock Creek; telephone conferences and correspondence with attorney and residential tenants at 2999 Turtle Creek regarding access to retrieve items; telephone conference with potential land broker; [REDACTED]; correspondence with information technology vendor regarding engagement agreement; continue going through receivership mail; telephone conferences and correspondence with counsel regarding [REDACTED]; meeting with attorney at 2999 Turtle Creek to recoup non-receivership legal files; visit 4107 Rock Creek to check mail and ensure security of premises. [Time reduced from 9.2 hours]</p>	8.00	\$385.00	\$3,080.00
10/26/2022	CCT	<p>Telephone conference and correspondence with M. Cooper (Pillar) regarding Opelika draw request; telephone conference with property advisor regarding next steps in disposition of properties; telephone conference with D. Crow regarding Venus properties; prepare for meeting with M. Barton and R. Roper; participate in same; telephone conference with S. Brooks (Greystone) regarding HUD loan on Opelika; telephone conference with R. Dozier regarding mail sent to 2999 Turtle Creek; review files from Whittington office; telephone conference and lengthy correspondence with potential title company regarding needs for lien reports on each known property; review working draft of motion governing administration of the estate; revise same; correspondence with counsel regarding same.</p>	8.00	\$385.00	\$3,080.00

[Time reduced from 10.9 hours]					
10/27/2022	CCT	Multiple meetings with attorneys and other tenants at 2999 Turtle Creek; correspondence with potential purchaser of Frisco property; correspondence with brokers regarding same; telephone conference with potential purchaser of 2999 Turtle Creek; [REDACTED]; [REDACTED]; correspondence with Regions Bank regarding failure to comply with receivership order; correspondence with broker for Rock Creek property regarding potential listing; [REDACTED]; telephone conference with potential purchaser of Frisco property; telephone conference with R. Roper regarding outstanding questions; meeting with A. Pamenari; correspondence with attorney representing Killeen development; correspondence with V. Barton regarding upcoming meeting. [Time reduced from 10.4 hours]	8.00	\$385.00	\$3,080.00
10/28/2022	CCT	Correspondence with V. Barton regarding items to return; correspondence with potential appraiser; telephone conference with land advisor regarding sale of Frisco property; meeting with potential broker at 4107 Rock Creek; meeting with A. Pamenari regarding antiques; meeting with V. Barton to return additional items; telephone conference with J. Hurley regarding interest in Killeen development; lengthy telephone conference with R. Roper and T. Barton regarding receivership properties; telephone conference and correspondence with counsel to equity holder regarding Frisco property. [Time reduced from 8.9 hours]	8.00	\$385.00	\$3,080.00
10/30/2022	CCT	Organize correspondence file from first two weeks of receivership. [No charge]	1.40	\$0.00	\$0.00
10/31/2022	CCT	Prepare for meeting with E. Espinosa regarding Marine Creek property; participate in same; correspondence with M. Cooper (Pillar) regarding meeting to discuss properties; telephone conference with broker to potential buyer of Rock Creek; telephone conference with potential insurance broker; telephone conference with broker for Frisco property; review comparables and listing agreement for Rock Creek; revise listing agreement; correspondence with potential broker	8.00	\$385.00	\$3,080.00

regarding same; correspondence with R. Roper regarding additional assets potentially held in receivership; correspondence with counsel to equity holder in Frisco property; review signature cards for Goldmark account; correspondence with bank regarding same; meeting with Amerigold Suites property manager to discuss paychecks and property needs; telephone conference with potential purchaser of Frisco property; revise LOI for same; correspondence with potential purchaser regarding same; telephone conference with insurance broker regarding needed insurance for Amerigold suites; review working draft of motion to supplement receivership order; correspondence with counsel regarding same. [Time reduced from 8.2 hours]

11/01/2022 CCT Check Barton-related mail from UPS Store; 5.20 \$385.00 \$2,002.00

[REDACTED]; correspondence with J. Patton (Palisades); correspondence with land broker regarding BOVs for Venus and Frisco; telephone conference with potential real estate attorney; telephone conference with interested purchaser of receivership property; correspondence with potential purchaser of Frisco tract regarding process for purchase and sale agreement.

11/02/2022 CCT Lengthy meeting with M. Fu and lawyers about 8.00 \$385.00 \$3,080.00

contacting investors; telephone conference with broker for 4107 Rock Creek; correspondence with potential interested purchaser on Amerigold; correspondence with multifamily advisor; meeting with counsel to discuss Vista Woods property; review working list of action items of various properties and assets; correspondence with counsel regarding same; prepare for telephone conference with counsel to MFO Venus Development and Moss & Associates; participate in same; telephone conference with counsel to 2999 Turtle Creek lender; telephone conferences with Heritage auctions regarding potential sales of artwork; prepare list of information needed from Turtle Creek lender; correspondence with C. Koonce regarding same; correspondence with accountant regarding Form 56 for receivership entities. [Time reduced from 9.6 hours]

11/03/2022	CCT	Review loan documents at 2999 Turtle Creek; correspondence with potential broker regarding same; telephone conference with entitlements consultant regarding development plan with city of Venus; [REDACTED]; participate in same; telephone conferences with potential land broker for 2999 Turtle Creek; [REDACTED]; prepare for meeting with Pillar Asset Management regarding loans on apartment assets; participate in same; meeting with counsel to discuss same; correspondence with counsel regarding [REDACTED].	7.60	\$385.00	\$2,926.00
11/04/2022	CCT	Trip to 2999 Turtle Creek and Rock Creek Residence to locate assets for auction sale and to locate documents related to potential apartment sales; correspondence with potential auction house for purposes of same; telephone conference with buyer's broker on Frisco property; telephone conference and correspondence with counsel to Greystone; prepare for meeting with Palisades regarding investment in Frisco property; participate in same; correspondence with interested purchaser for AmeriGold; correspondence with potential appraiser; lengthy meetings at Chase Bank regarding failure to freeze Receivership Entities' bank accounts; telephone conferences and correspondence with counsel regarding same.	6.60	\$385.00	\$2,541.00
11/06/2022	CCT	Organize Barton correspondence file. [No charge]	1.30	\$0.00	\$0.00
11/07/2022	CCT	Correspondence with counsel regarding [REDACTED]; begin drafting letter [REDACTED]; correspondence with Greystone (lender on apartment complexes) requesting information surrounding HUD loans; telephone conference with broker of Rock Creek residence; correspondence with potential seller of artwork and antiques; draft introductory letter to investors regarding receivership; draft investor information request form; draft email to investors regarding same.	6.20	\$385.00	\$2,387.00
11/08/2022	CCT	Correspondence with potential buyer of Frisco property regarding request for information; correspondence with counsel to T. Barton regarding same; telephone conference with UPS Store regarding status of mail; review documents from R. Magno regarding Venus development;	8.00	\$385.00	\$3,080.00

prepare for meeting with R. Magno; participate in same; [REDACTED];
 [REDACTED];
 correspondence with potential purchaser of Amerigold Suites; review mail forwarded from UPS store; prepare for lengthy strategy and planning meeting with counsel; participate in same; correspondence with potential seller of artwork; review BOV on Frisco property; correspondence with potential broker regarding same. [Time reduced from 8.1 hours]

11/09/2022	CCT	Correspondence with counsel regarding [REDACTED]; [REDACTED]; correspondence with investors regarding first day of receivership; telephone conference with Oncor regarding electricity at 2999 Turtle Creek; begin detailed review of bankruptcy docket and filings surrounding 2999 Turtle Creek; telephone conference with potential broker on 2999 Turtle Creek; telephone conference with manager at UPS Store; review draft lis pendens; telephone conference with attorney assisting with Venus development; revise lis pendens on Vista Woods property; correspondence with Venus city attorney; review working draft of NDA; telephone conference with counsel regarding same; review MLS listing for Rock Creek.	5.60	\$385.00	\$2,156.00
11/10/2022	CCT	Telephone conference with bankruptcy expert regarding 2999 Turtle Creek; [REDACTED]; [REDACTED]; [REDACTED]; continue reviewing 2999 Turtle Creek bankruptcy filings and underlying documents; telephone conference with counsel to Greystone regarding requested information; telephone conference and correspondence with broker for Rock Creek regarding listing and showings; review request for online access from receivership bank; complete same; telephone conference with potential broker on Amerigold; telephone conference and correspondence with broker on Rock Creek regarding potential sale; telephone conference with former counsel to Receivership Entities; review offer from DLP Capital regarding participation interest; correspondence with counsel regarding same; correspondence with potential broker on Venus properties; review title commitment for Frisco property.	5.80	\$385.00	\$2,233.00
11/11/2022	CCT	Prepare for introductory call with group of English-	7.20	\$385.00	\$2,772.00

		speaking investors; participate in lengthy call with same; telephone conference with counsel regarding same and outstanding list of items to be completed for receivership; review letter from M. Edney regarding DeSoto and Forney apartments; review draft response from counsel to same; revise same; telephone conference and correspondence with counsel regarding same; [REDACTED] [REDACTED]; cursory review of HNGH's response to motion regarding administrative procedures; [REDACTED].			
11/11/2022	CCT	Trip to Amerigold Suites to provide bi-weekly pay paychecks. [No charge]	0.40	\$0.00	\$0.00
11/13/2022	CCT	Organize correspondence file. [No charge]	1.80	\$0.00	\$0.00
11/13/2022	CCT	Correspondence with counsel to potential purchaser of multiple real estate assets; varied correspondence with counsel regarding [REDACTED] [REDACTED]; correspondence with IT vendor regarding attempts to secure access to Barton Entities' cloud server; cursory review of Agreed Orders in 2999 Turtle Creek proceeding; correspondence with E. Espinosa (counsel to DLP Capital) regarding participation agreement; correspondence with potential purchaser of Rock Creek regarding contents and other real estate assets for potential sale.	1.40	\$385.00	\$539.00
11/14/2022	CCT	Continue drafting first 30-day report.	1.10	\$200.00	\$220.00
11/15/2022	CCT	Correspondence with S. Latham regarding bank chart for first report; begin reviewing variety of responses to motion to supplement receivership order, administrative procedures motion, and Government's motion to stay; lengthy telephone conference regarding same; cursory review of receivership mail.	1.30	\$385.00	\$500.50
11/16/2022	CCT	Continue drafting initial status report. [Time reduced from 6.5 hours]	6.50	\$385.00	\$2,502.50
11/17/2022	CCT	Finish drafting quarterly report; draft update for receivership website regarding same. [Time reduced from 12.1 hours]	7.80	\$385.00	\$3,003.00
11/23/2022	CCT	Meeting with Amerigold property manager	0.40	\$0.00	\$0.00

		regarding bi-weekly payroll. [No charge]			
11/27/2022	CCT	Correspondence with T. Barton regarding personal mail, personal credit cards, and BOA credit accounts; correspondence with counsel regarding same.	0.20	\$385.00	\$77.00
11/27/2022	CCT	Organize correspondence file. [No charge]	1.80	\$0.00	\$0.00
11/29/2022	CCT	Cursory review of Barton's Motion to Stay pending appeal and appendix in support; continue revising supplemental brief in support of motion to supplement receivership order; begin reviewing working draft of declaration in support; meeting with M. Barton and V. Barton at Rock Creek Residence. [Time reduced from 4.4 hours]	2.40	\$385.00	\$924.00
11/30/2022	CCT	Continue reviewing working draft of supplemental brief; continue revising same; continue revising working draft of declaration in support; telephone conference with potential receivership bank and claims handler regarding potential distributions to China.	3.50	\$385.00	\$1,347.50
11/30/2022	CCT	Travel to Amerigold Suites to meet with property manager. [No charge]	0.60	\$0.00	\$0.00
12/05/2022	CCT	Prepare for telephone conference with lawyers to T. Barton regarding outstanding receivership items; participate in same.	0.50	\$385.00	\$192.50
12/07/2022	CCT	Organize correspondence files. [No charge]	0.80	\$0.00	\$0.00
12/07/2022	CCT	Correspondence with counsel to T. Barton regarding status of signatures on loan documents.	0.10	\$385.00	\$38.50
12/08/2022	CCT	Review Barton mail for personal records; meeting with M. Barton to deliver same; begin reviewing response to Barton's motion to stay; begin revising same substantially. [Time reduced from 6.4 hours]	4.10	\$385.00	\$1,578.50
12/11/2022	CCT	Organize correspondence file. [No charge]	0.90	\$0.00	\$0.00
12/14/2022	CCT	Cursory review of mail received from Mailbox	0.10	\$385.00	\$38.50
12/19/2022	CCT	Organize correspondence file. [No Charge]	0.40	\$0.00	\$0.00
			Quantity Subtotal		180.3
			Services Subtotal		\$65,439.00

Expenses

Date	Description	Client Total
10/18/2022	Postage sending notice of receiver letters to properties sold.	\$34.56
10/18/2022	Postage sending receivership letters to banks and brokers.	\$34.56
10/19/2022	FedEx lamination for warning signs.	\$21.36
10/20/2022	Filing Fee - Notice of Appointment of Receiver (USDC, Southern District of Alabama)	\$49.00
10/20/2022	Filing fee for U.S.D.C. Eastern District - notice of stay.	\$49.00
10/20/2022	Filing Fee - Notice of Appointment of Receiver (USDC, Western District of Michigan)	\$49.00
10/20/2022	Filing Fee - Notice of Appointment of Receiver (USDC, Eastern District of Tennessee)	\$49.00
10/20/2022	Filing Fee - Notice of Appointment of Receiver (USDC, Western District of Tennessee)	\$49.00
10/20/2022	Fee for Receiver changing of locks at 4107 Rock Creek Dr, Dallas, TX.	\$773.99
10/20/2022	Filing Fee - Notice of Appointment of Receiver (USDC, Middle District of Tennessee)	\$49.00
10/20/2022	Filing Fee - Notice of Appointment of Receiver (USDC, Middle District of Florida)	\$49.00
10/20/2022	Filing Fee - Notice of Appointment of Receiver (USDC, Northern District of Florida)	\$49.00
10/20/2022	Filing Fee - Notice of Appointment of Receiver (USDC, Northern District of Alabama)	\$49.00
10/20/2022	Filing Fee - Notice of Appointment of Receiver (USDC, District of Nevada)	\$49.00
10/20/2022	Filing Fee - Notice of Appointment of Receiver (USDC, Middle District of Alabama)	\$49.00
10/20/2022	FedEx Notice of Appointment of Receiver to U.S.D.C. M.D. Alabama.	\$70.56
10/20/2022	FedEx Notice of Appointment of Receiver to U.S.D.C. E.D. Tennessee.	\$76.70
10/20/2022	FedEx Notice of Appointment of Receiver to U.S.D.C. M.D. Tennessee.	\$70.56
10/20/2022	FedEx Notice of Appointment of Receiver to U.S.D.C. N.D. Alabama.	\$70.56
10/20/2022	FedEx Notice of Appointment of Receiver to U.S.D.C. District of Nevada.	\$78.99
10/20/2022	FedEx Notice of Appointment of Receiver to U.S.D.C. M.D. Florida.	\$76.70
10/20/2022	FedEx Notice of Appointment of Receiver to U.S.D.C. W.D. Michigan.	\$76.70
10/20/2022	FedEx Notice of Appointment of Receiver to U.S.D.C. N.D. Florida.	\$76.70
10/21/2022	Change of Addresses	\$17.60

10/24/2022	Domain registration fee for Barton Receivership website.	\$50.34
10/25/2022	Filing Fee - Notice of Appointment of Receiver (U.S.D.C. Michigan, Eastern District)	\$49.00
10/25/2022	Fee for Cort Thomas attorney admission - Michigan Eastern District Court.	\$49.00
10/25/2022	Fee for website setup for Barton Receivership.	\$127.79
11/02/2022	Postage for vendor letters (Spectrum, AAdvantage, Atmos Energy).	\$7.92
11/10/2022	Recording Fee - Notice of Lis Pendens - 3926 Vista Woods Dr, Carrollton, TX.	\$146.00
11/10/2022	Dallas County Property Records - Deed Records for 4107 Rock Creek Drive.	\$24.50
11/15/2022	Dallas County Clerk Property Records - obtain copy of UCC Financing Statement for SF Rock Creek	\$3.00
11/15/2022	Dallas County Clerk Property Records - fee to obtain Abstracts of Judgment	\$6.50
11/18/2022	Dallas County Clerk - fee to obtain General Warranty Deed on 4107 Rock Creek	\$2.00
11/18/2022	Dallas County Clerk - fee to obtain Special Warranty Deed	\$1.50
11/20/2022	Fee for pulling property records.	\$9.95
11/20/2022	Fee for pulling property records.	\$29.95
11/28/2022	Fee to obtain deed documents on 3600 Gillespie, Dallas, Texas.	\$12.50
12/06/2022	Fee for publication of sale of 4107 Rock Creek, Dallas, TX 75204 with Dallas Morning News.	\$336.00
12/06/2022	TXU payment for 2999 Turtle Creek, Dallas, Texas.	\$820.00
12/06/2022	TXU payment for 4107 Rock Creek, Dallas, Texas.	\$140.00
12/14/2022	Dallas County Property Records on 3407 and 3409 Hall Street.	\$7.00
12/16/2022	Fee to obtain copy of Notice of Lis Pendens from Dallas County Real Property Records.	\$1.50
12/28/2022	Fee for hearing transcript.	\$297.50
12/30/2022	Secretary of State entity searches (10.18.22 - 12.31.22)	\$120.00
	Expenses Subtotal	\$4,260.49
	Subtotal	\$69,699.49

SEC v. Barton – Asset Analysis and Recovery

Date	Initials	Description	Hours	Rate	Client
------	----------	-------------	-------	------	--------

					Total
11/14/2022	CCT	<p>Telephone conference with broker for Rock Creek property regarding offers received; draft counter to preferred offer to account for receivership; correspondence with broker regarding same; telephone conference and correspondence with counsel regarding [REDACTED]; meeting with Heritage at 2999 Turtle Creek and Rock Creek; correspondence with potential auctioneers of furniture and antiques; correspondence with Oncor and TXU regarding electricity at same; correspondence with broker on Rock Creek regarding potential appraisers; correspondence with multiple potential purchasers of receivership properties; telephone conference with potential purchaser of Rock Creek; telephone conference with broker for Rock Creek regarding offers received to date; correspondence [REDACTED]; correspondence [REDACTED]. [Time reduced from 7.1 hours]</p>	6.90	\$385.00	\$2,656.50
11/15/2022	CCT	<p>Telephone conference with [REDACTED]; [REDACTED]; telephone conference and correspondence with potential auctioneers for contents of house and office; telephone conference regarding potential value of antiques; review title commitment for Rock Creek; telephone conference with attorney to City of Frisco; meeting with Amerigold property manager regarding outstanding bills; correspondence with counsel regarding insurance for Amerigold; correspondence with construction manager on Opelika. [Time reduced from 7.9 hours]</p>	6.70	\$385.00	\$2,579.50
11/16/2022	CCT	<p>Telephone conference regarding antiques at Rock Creek; correspondence and messages for potential appraisers on Rock Creek; correspondence with counsel to Greystone regarding Order Supplementing Receivership Order; lengthy telephone conference with J. Kane regarding</p>	1.50	\$385.00	\$577.50

HNHG's claims.

11/17/2022	CCT	Send email to third appraiser on Rock Creek property; telephone conference and correspondence with Vista Bank regarding receivership account.	0.20	\$385.00	\$77.00
11/18/2022	CCT	Telephone conference and correspondence with potential purchaser of Receivership property; telephone conference and correspondence with counsel regarding potential judgment liens involving Rock Creek; telephone conference with counsel regarding difficulties with TXU on 2999 Turtle Creek; correspondence with title company regarding Rock Creek; correspondence with potential broker regarding Amerigold Suites; correspondence with counsel regarding effect of interlocutory appeal of receivership order; cursory research of same.	1.80	\$385.00	\$693.00
11/21/2022	CCT	Telephone conference and correspondence with potential broker on Amerigold suites; correspondence with general contractor on Opelika project; correspondence with potential purchaser of Frisco property regarding status of PSA; correspondence [REDACTED]; telephone conference with counsel regarding [REDACTED]; telephone conference and correspondence with Pillar regarding Parc at Opelika draw requests from contractor; review [REDACTED]; telephone conference with counsel to lender on Opelika; correspondence with insurance broker regarding potential premiums.	3.10	\$385.00	\$1,193.50
11/22/2022	CCT	Meetings at Turtle Creek Office regarding return of third parties' personal property; search through Turtle Creek Office records for evidence supporting supplemental briefing on entities; telephone conference with general contractor on Opelika property; review documents from title company on sale of Rock Creek Residence; telephone conference [REDACTED]; telephone conference [REDACTED]; begin reviewing Purchase and Sale Agreement on Frisco; telephone conference with A. Fox and J. Mahaffey regarding same; correspondence with potential broker on Amerigold Suites.	5.30	\$385.00	\$2,040.50

and 2999 Turtle Creek; follow-up correspondence regarding same; correspondence with title company regarding Rock Creek survey; correspondence with Rock Creek appraisers. [Time reduced from 6.5 hours]

11/30/2022	CCT	<p>[REDACTED]; correspondence with appraisers on Rock Creek regarding status of appraisals; prepare for telephone conference with attorney for title company; participate in same; correspondence with attorney for title company regarding same; review SF Rock Creek LLC Company Agreement; review Ramolia abstract of judgment; [REDACTED]; [REDACTED]; begin reviewing working draft of Purchase and Sale Agreement for Frisco property; correspondence with counsel regarding same.</p>	3.90	\$385.00	\$1,501.50
12/01/2022	CCT	<p>Prepare for and participate in meeting with committee of English-speaking investors regarding first status report.</p>	1.50	\$200.00	\$300.00
12/01/2022	CCT	<p>[REDACTED]; telephone conference and correspondence with multiple persons at Greystone regarding next steps with Opelika loan; correspondence with counsel for T. Barton regarding same; correspondence with Pillar regarding same; telephone conference with potential broker for Amerigold property; telephone conference and correspondence with control person and counsel on Killeen property; begin reviewing partnership agreement surrounding same; review working draft of motion to approve sale of Rock Creek Residence; correspondence with counsel regarding same; draft declaration in support of same; correspondence with Heritage Auctions regarding sculptures; correspondence with consultant to City of Venus; correspondence with title company regarding Rock Creek sale; correspondence with appraiser regarding status of appraisal on Frisco property. [Time reduced from 9.1 hours]</p>	8.00	\$385.00	\$3,080.00
12/02/2022	CCT	<p>Meeting with T. Wells [REDACTED]</p>	7.30	\$385.00	\$2,810.50

[REDACTED]; telephone conference with C. Koonce regarding [REDACTED]; telephone conference with counsel regarding [REDACTED]; correspondence with Heritage Auction regarding Tang reproduction sculptures; correspondence with counsel regarding [REDACTED]; telephone conference and correspondence with J. Mahaffey regarding revisions to Frisco Purchase and Sale Agreement; review final revisions; send same to R. Salem; correspondence with potential broker on Gillespie and TC Hall properties; telephone conference with broker to potential purchaser of Frisco property; telephone conference and correspondence with potential purchasers of HUD apartments; telephone conference with potential broker on TC Hall and Gillespie properties; meeting with art and antiques appraiser at 2999 Turtle Creek and 4107 Rock Creek to discuss value of various objects; review appraiser's engagement letter for Frisco property; revise same; telephone conference with potential purchaser of HUD apartments; correspondence with M. Edney regarding request for T. Barton signatures on HUD documents.

12/04/2022	CCT	Correspondence with interested purchaser of HUD properties; correspondence with HVAC consultant regarding Turtle Creek heating units; correspondence with real estate advisor; correspondence with potential bank and distribution agent regarding sending distributions to China.	0.60	\$385.00	\$231.00
12/05/2022	CCT	Correspondence with potential auctioneer for Turtle Creek property; review listing agreement for Amerigold; revise same; correspondence with potential broker regarding same; review documents for signature from receivership bank; meeting with local bank manager regarding same and wire to appraiser for Frisco property; telephone conference and correspondence with potential bank and distribution agent regarding eventual distributions to China; correspondence with potential developer of Venus land regarding potential Barton interference; telephone conference and correspondence with counsel regarding [REDACTED]; telephone conference with interested purchaser in Rock Creek; review order setting	6.20	\$385.00	\$2,387.00



Brown Fox PLLC
 Emerging Department
 8111 Preston Road, Suite 300
 Dallas, Texas 75225
 Telephone: 214-327-5000
 Fax: 214-327-5001

INVOICE

Invoice # 33660
 Date: 01/20/2023

Barton Receivership

SEC v. Barton – Case Administration

Services

Date	Initials	Description	Hours	Rate	Client Total
10/18/2022	CCT	Review receivership order; telephone conference and correspondence with SEC regarding same; correspondence with R. Roper regarding same; telephone conference with counsel to M. Fu regarding same; telephone conferences with IT vendor regarding potential collection of IT assets; telephone conference with bankruptcy counsel; secure offices at 2999 Turtle Creek; telephone conferences with M. Edney (counsel to Barton) regarding same; participate in interviews with V. Barton, R. Marx, A. Marx, J. Morrelli (tenant), and V. McMurray; begin inspecting IT assets to ensure preservation of same; ensure securing of all exterior doors; meetings with counsel to discuss first days of receivership. [Time reduced from 8.3 hours]	8.00	\$385.00	\$3,080.00
10/19/2022	CCT	Continue investigation of 2999 Turtle Creek office; correspondence with M. Edney regarding non-review of privileged documents; meetings with counsel to discuss same; telephone conferences and correspondence with potential brokers and other real estate industry professional regarding needs of receivership; telephone conferences with IT vendor regarding needs of receivership; correspondence with accountant regarding potential needs of receivership; telephone conference with R. Roper; telephone conference and correspondence with potential property manager; lengthy telephone conference with lender's bankruptcy counsel regarding 2999 Turtle Creek; telephone conference with interested purchaser of assets; correspondence with U.S. Trustee's office.	7.90	\$385.00	\$3,041.50

regarding Barton signatures on Greystone documents; correspondence with counsel to Greystone regarding same; correspondence with potential broker on Venus properties; review further revisions to DLP agreement from E. Espinosa; correspondence with E. Espinosa regarding same; cursory review of Barton's response to supplemental brief on entities; begin drafting motion to ratify DLP agreement; draft proposed order in support of same.

12/07/2022	CCT	Prepare for and participate in lengthy meeting with building engineer at 2999 Turtle Creek to evaluate HVAC, electrical, gas, and irrigation systems.	2.60	\$200.00	\$520.00
12/08/2022	CCT	Correspondence with potential broker on Amerigold; continue drafting motion to ratify DLP agreement; review M. Barton's response to motion to supplement receivership order; correspondence with potential purchaser of HUD apartments; telephone conference and correspondence with counsel to Villita counterparty regarding participation agreement; telephone conference with purchaser of 4107 Rock Creek regarding M. Barton's request for personal effects; [REDACTED] telephone conference with counter-party and counsel regarding Ennis County party subject to newly filed lis pendens; telephone conference with potential purchaser of 4107 Rock Creek home furnishings; correspondence with insurance broker regarding general liability insurance on Amerigold; correspondence with purported counsel to Titan Investments regarding new lawsuit.	3.90	\$385.00	\$1,501.50
12/09/2022	CCT	Telephone conference with counsel regarding response to motion to stay; continue revising same; draft declaration in support of same; gather exhibits in support of same; review correspondence from B. Walker regarding Titan Investments property; telephone conference with counsel regarding PSA on DeSoto property; telephone conference with real estate advisor regarding Amerigold; telephone conference with Ennis property owner; meeting with Amerigold property manager regarding potential sale of property; finish revising working drafts of response to motion to stay and appendix.	3.60	\$385.00	\$1,386.00
12/12/2022	CCT	Telephone conference and correspondence with counsel regarding [REDACTED]	6.70	\$385.00	\$2,579.50

[REDACTED]
 correspondence with potential purchaser of Frisco property; correspondence with counsel regarding Walker Ranch; review documents and correspondence regarding Lumar Land; meeting with counsel regarding [REDACTED]; [REDACTED]; correspondence with potential broker on HUD apartments and other properties; [REDACTED]; review final draft of PSA on Frisco property; correspondence with counsel regarding same; correspondence with purchaser regarding same; telephone conference with auditor on DeSoto, Forney, and Ingleside properties; telephone conference with contractor on Opelika; correspondence with Greystone regarding same; correspondence with potential creditor; [REDACTED]; [REDACTED]; correspondence with potential purchasers of Venus properties.

12/13/2022 CCT	<p>[REDACTED]; correspondence with appraiser of Frisco property; correspondence with auditor regarding needed documentation; correspondence with Pillar regarding status of Opelika project; telephone conference with potential broker on HUD apartments; participate in kickoff call with broker on Amerigold property; review PSA on Ridgeview Addition; telephone conference with counsel to purchaser regarding same; continue reviewing participation agreement on Villita property; correspondence with C. Braun regarding same; correspondence with purchaser of Frisco property regarding execution version of PSA; telephone conference with Pillar regarding status of Opelika project; telephone conference with counsel to subcontractor regarding lien on Opelika project; correspondence with Greystone regarding same; review second Order supplementing receivership; correspondence with counsel to DLP Capital regarding same; telephone conference with person inquiring about Arrowhead property; correspondence with City of Venus city attorney.</p>	6.00	\$385.00	\$2,310.00
12/14/2022 CCT	<p>Begin reviewing Barton's response to motion to sell Rock Creek Residence; cursory research [REDACTED]</p>	5.70	\$385.00	\$2,194.50

P [REDACTED]
 [REDACTED]
 telephone conferences with developers who are potential purchasers of Venus property; correspondence with potential broker of Hall and Gillespie properties; telephone conference with interested purchaser of other receivership properties; telephone conference with counsel to developer on Killeen property regarding participation interest; telephone conference with B. Walker regarding return of transfers; telephone conference with purchaser of Frisco property.

12/15/2022	CCT	Review working draft of reply in support of motion to sell Rock Creek; revise same; review working draft of response to HNGH's motion to intervene and confirm ownership; revise same; review working draft of motion to ratify DLP Agreement; revise same; telephone conference with potential auctioneer for contents of Turtle Creek office; correspondence with property manager regarding payment of Opelika mortgage; telephone conference and correspondence with Greystone regarding same; meetings and correspondence with counsel regarding [REDACTED]; review working draft of verified notice regarding sale of Rock Creek; revise same; lengthy correspondence with B. Walker regarding potential resolution of dispute with Titan Investments; correspondence with counsel to HNGH.	7.00	\$385.00	\$2,695.00
12/15/2022	CCT	Meeting with Property Manager at Amerigold. [No charge]	0.60	\$0.00	\$0.00
12/16/2022	CCT	Telephone conferences and correspondence with B. Walker regarding Ennis property; telephone conference with title company regarding same; telephone conference with counsel regarding same; correspondence with auditors regarding general ledger for Opelika Property; correspondence with broker regarding Amerigold property; telephone conference with D. Crow regarding Venus 59 property; review working draft of motion to declare lis pendens void; correspondence with interested purchaser of certain Receivership properties; correspondence with potential auction company.	3.30	\$385.00	\$1,270.50
12/18/2022	CCT	Review notice of no bona fide offers on Rock Creek Property; finalize same. [No charge]	0.20	\$0.00	\$0.00

12/19/2022	CCT	Meeting with counsel to prepare for hearing on sale of Rock Creek Property; attend same at federal courthouse; telephone conference with potential interested purchaser of Receivership properties; meeting with counsel [REDACTED]; [REDACTED]; correspondence with potential purchaser of Rock Creek; [REDACTED]; [REDACTED]; telephone conferences with B. Walker regarding potential resolution; telephone conference with title company regarding same; [REDACTED]; telephone conference with attorney to lender on Ridgeview Additions; telephone conference with potential purchaser of Rock Creek Property regarding Barton interference with sale; telephone conference with broker regarding same; correspondence with counsel regarding same; telephone conference and correspondence with lienholder on Frisco property; correspondence with advisor on Venus property; review working draft of Motion to Approve Sale of Frisco Property; revise same; correspondence with counsel regarding same. [Time reduced from 8.7 hours]	8.00	\$385.00	\$3,080.00
12/20/2022	CCT	Meeting at Amerigold Suites with Property Manager. [No charge]	0.60	\$0.00	\$0.00
12/20/2022	CCT	Search for QuickBooks, bank, and other information at 2999 Turtle Creek; meeting with potential auctioneer to discuss sale of contents; meeting with various persons at 2999 Turtle Creek; review working draft of joint motion to interplead funds and order in support of same; begin revising same; telephone conference with B. Walker regarding same; review working draft of release of lis pendens; revise same; telephone conference with broker on sale of 4107 Rock Creek.	6.00	\$385.00	\$2,310.00
12/21/2022	CCT	Cursory review of Barton's Appendix in support of Response to motion to ratify settlement with DLP; multiple telephone conferences with B. Walker regarding potential sale of Walker property; multiple telephone conferences and correspondence with title company regarding same; correspondence with Pillar regarding outstanding Opelika invoices; correspondence with contractor regarding same; review potential lease with purchaser of 4107 Rock Creek; revise same; telephone conference and correspondence with	3.90	\$385.00	\$1,501.50

potential purchaser regarding same; telephone conference with broker regarding same; execute lease via DocuSign; telephone conference with counsel to DLP regarding status of motion to ratify.

12/22/2022	CCT	Coordinate needed documents for closing on B. Walker property with title company; review order approving DLP settlement; correspondence with E. Espinosa regarding same; review working draft of motion to appoint appraisers and approve sale of Frisco property; revise same; review working draft of appendix in support of same; revise same; correspondence with counsel regarding [REDACTED]; [REDACTED]; correspondence with counsel regarding [REDACTED].	0.80	\$385.00	\$308.00
12/23/2022	CCT	Correspondence with insurance broker regarding increased premium on Amerigold Suites; [REDACTED].	0.10	\$385.00	\$38.50
12/27/2022	CCT	Revise release of lis pendens on B. Walker property; execute same; correspondence with purchaser of Rock Creek property regarding wire instructions for lease payment; correspondence with counsel regarding [REDACTED]; correspondence with counsel regarding [REDACTED]; [REDACTED]; correspondence with counsel to HN Capital regarding initial meeting in January; correspondence with counsel regarding same; review Receivership bank records for Barton's payment of sanctions; correspondence with counsel regarding same; correspondence with counsel regarding [REDACTED]; [REDACTED]; correspondence with counsel regarding request from US Trustee regarding status update.	1.10	\$385.00	\$423.50
12/28/2022	CCT	Correspondence with counsel regarding [REDACTED]; [REDACTED]; correspondence with counsel regarding [REDACTED]; [REDACTED]; correspondence with counsel regarding [REDACTED]; correspondence with interested in purchaser of Rock Creek regarding status update; correspondence with counsel regarding [REDACTED]; [REDACTED];	0.90	\$385.00	\$346.50

correspondence with B. Walker regarding status of closing and funding; correspondence with counsel to DLP confirming receipt of funds; correspondence with counsel regarding [REDACTED].

12/29/2022	CCT	Telephone conference and correspondence with counsel regarding [REDACTED]; review working draft of response to Barton's motion to stay; revise same; correspondence with counsel regarding same; correspondence with purchaser of Rock Creek property regarding lease commencement date; correspondence with counsel regarding same.	2.30	\$385.00	\$885.50
12/30/2022	CCT	Correspondence with counsel regarding [REDACTED]; correspondence with B. Walker regarding updates on closing and funding.	0.50	\$385.00	\$192.50

Quantity Subtotal	140.7
Subtotal	\$52,756.50
Hours Total	321.0
Services Total	\$118,195.50
Expenses Total	\$4,260.49
Total	\$122,455.99

Current Statement payable upon receipt and due within 30 days.

Federal Tax ID 61-1764390

Wire Payments
 Veritex Community Bank
 17950 Preston Road, Suite 500
 Dallas, TX 75225
 ABA # 111024865 Account # 30081159

Check Payments
 Brown Fox PLLC
 8111 Preston Road, Suite 300
 Dallas, TX 75225

Credit Card Payments <https://secure.lawpay.com/pages/brown-fox-pllcc/operating>

Direct payment inquiries to the Account Services Department at accounting@brownfoxlaw.com

Thank you for choosing Brown Fox. We appreciate your business.

EXHIBIT C



Brown Fox PLLC
Billing Department
8111 Preston Road, Suite 300
Dallas, Texas 75225
Telephone: 214-327-5000
Fax: 214-327-5001

INVOICE

Invoice # 33661
Date: 01/20/2023

Barton Receivership

SEC v. Barton – Non-Receiver Activity: Asset Analysis and Recovery

Date	Initials	Description	Hours	Rate	Client Total
10/18/2022	CCK	Review order; revise employee questionnaire; meet with C. Thomas to discuss [REDACTED]; travel to JMJ office location to interview employees and serve order; recover documents and return to office; [REDACTED]; call with US Trustee regarding pending motion to dismiss Wall Bankruptcies pending in the EDTX; review email from Defendants' bankruptcy counsel; travel to Turtle Creek location and interview two attorneys on site, review some materials available, assist with securing the premises and escorting two employees and Barton's relatives out the door; [REDACTED]; return to office; confer with C. Thomas regarding [REDACTED]; draft Notice of Stay and confer with assistant regarding filing same in multiple cases; up date/add to To-Do list; draft letter to vendors/utility providers; draft letter to real estate broker; draft template letter to contracting parties requesting information; respond to email from counsel for Fu; review response from counsel for Barton regarding requested meeting and confer with C. Thomas regarding same.	9.80	\$385.00	\$3,773.00
10/18/2022	TBW	Serve receivership order at Wittington Place office; search same to locate any documents; serve receivership order at 2999 Turtle Creek; investigate Turtle Creek officer and contents; meet with R. Marx and A. Marx to discuss collecting documents related to receivership entities; surveyed property	7.40	\$200.00	\$1,480.00

		and took pictures of rooms and contents; secured exterior doors and monitored disabling of fob access.			
10/19/2022	CCK	Telephone call to property management for Whittington address; review and calendar Defendants' deadlines to provide asset information; confer with assistant regarding mail forwarding; return call from B. Foshay regarding pending lawsuit and possible settlement; call from Joyce Lindauer, counsel to numerous Receivership Entities; call with property management; email Receivership Order and request for copy of leases; review additional correspondence from defendants' counsel regarding privilege/access issues; travel to 2999 Turtle Creek location and review documents, searching for asset information (extensive); call S. Bedoya and asset manager requesting interviews; call with attorney for Bedoya; email requested information to counsel; telephone conference with C. Thomas and R. Roper regarding assets and status of various lawsuits; return emails from US Trustee in the NDTX; return to office; confer with assistant regarding [REDACTED]; review email and notices of default from owner on Marine Creek properties; confer with C. Thomas regarding [REDACTED]; call with accounting firm that prepares financials for properties secured by HUD.	11.10	\$385.00	\$4,273.50
10/19/2022	SRL	Research in regard to SF Rock Creek, LLC; review attorneys in associated cases to prepare email chart of same; research Federal Aviation Administration website for aircraft owned by JMJAV, LLC prepare draft letter to Arlington Municipal Airport regarding retaining possession of aircraft; telephone calls to each district in Tennessee, Florida, Alabama, and Nevada regarding filing of Notice of Appointment of Receiver; prepare Notice of Appointment of Receiver for filing in Southern District of Alabama and transmittal letter for same; file Change of Address for Defendant JMJ Development, LLC; other miscellaneous correspondence and meetings regarding receivership.	7.50	\$150.00	\$1,125.00
10/19/2022	TBW	Conduct extensive review of non-privileged documents located at 2999 Turtle Creek; create list of entities related to T. Barton; other miscellaneous correspondence and meetings regarding receivership. [Time reduced from 8.3 hours]	4.20	\$200.00	\$840.00

10/20/2022	CCK	<p>Review email communications from property management contact regarding management for apartments and confer with C. Thomas regarding same; respond to email from attorney who received notice of stay and request for information; forward message from plaintiffs' attorney regarding stay to T. Wells to return call; travel with C. Thomas to offices for Barton's attorneys and meet to discuss properties and information necessary for performing the mandate; return to office and stop at Turtle Creek location to recover additional documents related to an additional Barton entity; draft summary list of items requested from Defendants to email to Barton's counsel; confer with C. Thomas regarding [REDACTED]; respond to email from US Trustee for EDTX regarding hearing set today and continuance for same; call to Texas Brand Bank regarding assets/accounts/CD; lengthy call with bankruptcy counsel for P. Kirby, creditor in 2999TC Founders; draft letter to credit card companies; draft email to counsel for Barton with list of requested information; confer with C. Thomas regarding taking possession of Rock Creek property; call with the SEC regarding current dispute regarding possession over SF Rock Creek property; review and revise letters to engineering firm and construction firm; forward message from individual who has bar tending materials on site at Turtle Creek location; review message from bank confirming receipt of Receivership Order; confer with S. Latham regarding letter sent to Am Ex; review management agreement for undisclosed; call from developer regarding future communications with JMJ regarding development issues; call with C. Thomas regarding [REDACTED]; begin drafting motion to supplement Receivership Order; call with US Trustee for ND regarding numerous pending cases, Trustee's motion to dismiss and numerous issues related to pendency of bankruptcies while receivership is also in place; email summary of same to C. Thomas; review email from title company regarding escrowed funds and respond with instructions; confer with T. Wells regarding [REDACTED]; confer with assistant regarding [REDACTED]; review pauper's affidavit recently filed by Barton; draft motion to supplement receivership order; review</p>	12.10	\$385.00	\$4,658.50
------------	-----	--	-------	----------	------------

		supplemental list of entities and edit same; begin drafting Thomas Dec ISO motion to supplement.			
10/20/2022	TBW	Serve receivership order at 4107 Rock Creek; secure same and supervise locksmith changing locks at same; walk-through property and investigate contents; review and organize photos taken at Wittington Office and 2999 Turtle Creek; other miscellaneous correspondence and meetings regarding receivership. [Time reduced from 6.2 hours]	3.70	\$200.00	\$740.00
10/21/2022	SRL	Telephone calls to banks regarding status of legal hold on all accounts controlled by T. Barton; research of Dallas CAD regarding 13636 Goldmark Dr., Dallas; telephone calls and emails with J. Lissy at Sendera Title regarding wiring of funds; prepare and transmit letter to Capital One Legal Department regarding Order Appointing Receiver; prepare and transmit letter to JP Morgan Chase Bank Court Orders and Levies Department regarding Order Appointing Receiver; emails with K. Songer at Texas Republic Bank regarding Order Appointing Receiver; initiate change of addresses with USPS for 2999 Turtle Creek Blvd., 4107 Rock Creek Dr., 1755 Wittington Pl Suite 320 and Suite 340.	6.60	\$150.00	\$990.00
10/23/2022	CCK	Review lengthy letter, settlement agreement, and consolidation order for BR adversaries from attorney Kemp regarding pending litigation involving Frisco property owned by FHC Acquisitions, LLC, and breach of settlement between Dallas Real Estate Lenders; email accountants requesting edits to the proposed engagement agreement; continue drafting motion to approve engagement of counsel and accountants and forward same to C. Thomas; review spreadsheet regarding status of various properties; confer with assistant regarding status of 754 notices and additional cases in which Notice of Stay should be filed; review multiple emails and messages, status of various tasks necessary to accomplish mandate; begin drafting motion to establish admin procedures governing the receivership.	4.00	\$385.00	\$1,540.00
10/26/2022	TBW	Call with C. Thomas and M. Cooper regarding Opelika, emails to J. Simon at Vista Bank; emails to M. Rodriguez at Alamo Title; emails to M. Cooper; email to B. Kuhn at Alamo Title sending	4.90	\$200.00	\$980.00

		receivership order; email to P. Wilson and D. Graham requesting additional financials; research properties in Venus, TX; begin spreadsheet tracking properties; call with J. Gitlin; locate TXU account numbers; revise letter to Commonwealth Title; other miscellaneous correspondence and meetings regarding receivership. [Time reduced from 9.4 hours]			
10/27/2022	SRL	Research entity status of [REDACTED]; receive and review document productions from PNC Bank and Regions Bank; prepare response to TXU's request for additional information.	2.40	\$110.00	\$264.00
10/28/2022	TBW	Video call with Parc at Opelika construction team for HUD draw certification; emails and call with B. Armstrong regarding Amerigold Suites insurance; emails and call with J. Silvasan about payroll and management of Amerigold Suites; continue creating property list for entities; research Johnson and Dallas county appraisal districts; revise letter to Bank of America; emails to J. Simon regarding bank accounts; email to D. Rollins regarding insurance; other miscellaneous correspondence and meetings regarding receivership. [Time reduced from 8.6 hours]	5.90	\$200.00	\$1,180.00
10/31/2022	CCK	Confer with T. Wells regarding [REDACTED]; review contract documents related to Marine Creek, Orchard Farms, in preparation for meeting with developer; meet with attorney for developer on Marine Creek and Orchard Farm properties regarding development and participation agreements; email V. McMurry about meeting; review C. Thomas emails to [REDACTED]; review emails from BOA and confer with assistant and T. Wells regarding same; call with Roper regarding request for a call to discuss proposal by Barton, request for lease agreement on Max Barton's residence, status of company cars; confer with T. Wells and C. Thomas regarding paying employees and account issues regarding same; call with SEC regarding questions related to supplemental list of entities and trusts; review emails from counsel for Fu and Wall regarding conference on supplemental list; revise motion	8.80	\$385.00	\$3,388.00

regarding same to include specific information about trusts; confer with C. Thomas regarding [REDACTED]; revise motion and order regarding admin procedures to address same; review request for extension to respond received from Cap One and respond to same; review list of supplemental entities regarding which Barton wants to confer/contest; confer with S. Latham regarding consolidating/gathering information to respond to same; review quote from insurer regarding stop gap coverage for Amerigold and confer with C. Thomas regarding [REDACTED]; confer with T. Wells [REDACTED]; confer with C. Thomas regarding [REDACTED]; review additional research and summary regarding contested "supplemental" entities and request additional information summary from S. Latham; email exchanges with V. McMurry to schedule meeting; review emails regarding meeting with Pillar, lender on AL/Parc at Opelika development; continued edits to motion to approve admin procedures and related order, and order regarding supplemental entities; forward voicemail to T. Wells from lender secured with airplane to return call; call with Roper regarding Defendant's proposal to buy out/extricate certain entities, additional requested information, and continuing conference regarding motion to supplement; confer with C. Thomas regarding [REDACTED]; review summary of letters sent to purchasers listed in the EX B to SEC's complaint and confer with assistant regarding [REDACTED]; listen to call from Cap One responding to request for information by close of business today; review information about additional bank account located at Vista and confer with T. Wells about requesting statements/confirmation of freeze; revise motion to supplement adding additional discussion regarding trusts; forward same to C. Thomas for review and comment; review email from counsel for entities with motion for contempt pending against Barton and McMurry and order entered today by Judge Rhoades; respond to email.

10/31/2022	SRL	Analyze various Barton entities, review Secretary	2.90	\$110.00	\$319.00
------------	-----	---	------	----------	----------

		of State information, and case file for entity information and prepare chart of status to assist in preparations for conference regarding questionable entities.			
10/31/2022	TBW	Email to P. Andrews and R. Tatum regarding Bank of America accounts; call with TXU regarding Amerigold Suites; emails and calls to B. Armstrong regarding insurance at Amerigold; call and introduction email with J. Krueger regarding DWU; emails to M. Cooper regarding Parc at Opelika; call with R. Boone regarding stayed litigation; call to J. Medley; email to M. Gill regarding insurance; numerous emails to C. Koonce and C. Thomas regarding updates; other miscellaneous correspondence and meetings regarding receivership. [Time reduced from 10.6 hours]	7.40	\$200.00	\$1,480.00
11/01/2022	SRL	Review Johnson County Clerk's records for foreclosures on any Barton owned properties; analyze documents on land owned by DJD Land Partners.	2.10	\$110.00	\$231.00
11/01/2022	TBW	Research Johnson County records for foreclosure notices; research Johnson County Appraisal district for information on Ridgeview Addition; calls with J. Silvasan regarding Amerigold; emails to Vista Bank and Texas Brand Bank regarding updated entities list; call with Bank of America regarding accounts; calls with TXU to determine past due amount and to pay bill for Amerigold Suites; call with M. Barton regarding Square account; call with J. Medley regarding Third Coast Bank and Barton plane; review documents from 2999 Turtle Creek for information on Gillespie Villas; other miscellaneous correspondence and meetings regarding receivership. [Time reduced from 6.8 hours]	6.80	\$200.00	\$1,360.00
11/02/2022	SRL	Review deed history for 3926 Vista Woods Dr., Carrollton, Texas.	0.70	\$110.00	\$77.00
11/04/2022	CCK	Review response from Louisiana Bank regarding loan documents related to TC Hall project; confer with T. Wells regarding response to same; email exchange with V. McMurry regarding his cancellation of meeting scheduled for today; close review of privilege protocol proposed by T. Barton and response to request for information and documents; confer with C. Thomas regarding same	4.60	\$385.00	\$1,771.00

and begin research and drafting response; review additional notice of stay filed in state court case; meet with C. Thomas and lienholder on Frisco property and equity holder on TC Hall property; confer with T. Wells regarding no response from Chase; review transaction docs for sale by Ridgeside entity, received from counsel for buyer and email exchanges with same regarding same and email title company requesting additional information and providing copy of receivership order; confer with T Wells regarding communications with LA bank regarding request for documents, and with Vista regarding similar issues; review orders granting expedited briefing on motion for admin procedures; review additional materials received from developer on FL project; review notice received from attorney Metzger regarding hearing set for Monday and confer with assistant regarding filing notice of stay in same, confer with T. Wells regarding [REDACTED]; confer with C. Thomas regarding [REDACTED]; respond to email regarding narrowed NDA from stalking horse bidder; review loan docs received from Texas Brand Bank, forward same to C. Thomas; email communications with C. Thomas and T. Wells regarding [REDACTED]; telephone conversation with C. Thomas regarding [REDACTED]; email Texas Brand Bank regarding additional entities and EINs.

11/05/2022	CCK	Continued research regarding [REDACTED].	0.40	\$385.00	\$154.00
11/06/2022	CCK	Draft additional letter to Chase regarding failure to respond; review email from Capital One and forward same to assistant; confer with C. Thomas regarding [REDACTED].	0.30	\$385.00	\$115.50
11/09/2022	SRL	Research regarding Titan 2022 Investments, LLC; review recent foreclosures in Johnson County, Texas for properties potentially owned by Barton entities.	1.80	\$150.00	\$270.00
11/10/2022	CCK	Continued and close review of T. Barton proposal	6.90	\$385.00	\$2,656.50

to which property should be sold and objection to sale of any others; email C. Thomas regarding [REDACTED]; review additional letter from T. Barton regarding request to seal bank responses and objections to Receiver obtaining any financial information pertaining to T. Barton; begin drafting response to same; review updated summary regarding status of communications with banks and provide additional information regarding same; review email from property manager regarding frozen management accounts and confer with T. Wells regarding addressing same with Chase; confer with C. Thomas regarding [REDACTED]; review offer to purchase Participation interest received from DLP capital; call prior IT employee for receivership entities; review LinkedIn profile for same, looking for additional contact information; review C. Thomas changes to response to T. Barton's letter regarding PII and Barton's individual accounts; review Bank of America filing to ensure no PII and send revised response; brief review of certain pieces of mail from yesterday; confer with assistant regarding [REDACTED]; email S. Latham regarding [REDACTED], and confer with C. Thomas regarding [REDACTED]; review letter from counsel regarding lawsuit by BM318 against Lumar Land and Dixon; call with opposing counsel regarding same, and follow up call with T. Wells regarding same; call with IT, Q. Lynn; email Receivership Order to Mr. Lynn and connect him to retained IT expert, C. Koons, review correspondence to Intuit and confer with assistant regarding [REDACTED]; review correspondence from Texas Brand Bank compromising interest owed on loans which are collateralized by CDs; very lengthy call with Intuit regarding Quickbook access; email counsel for S. Bedoya regarding getting a copy of her DL to provide to Quickbook for access; [REDACTED]; call with C. Thomas to discuss [REDACTED]; quick review of Chase records and recommendation to have Julissa review and annotate.

11/10/2022	SRL	Review communications with banks and responses to requests for account information to determine funds for turnover; [REDACTED] research Dallas County Property Records for deed information on 4107 Rock Creek Drive, Dallas.	3.10	\$110.00	\$341.00
11/11/2022	CCK	Review summary of accounts and balances frozen by Chase and confer with team regarding which accounts are operating accounts for the apartment entities; email E. Espinosa regarding request for wire documents evidencing where payments made to T. Barton were sent; draft email to title company handling closing on Dennison Katy Trail deal; review documents received in response regarding whether funds on deposit in escrow should be released; continue drafting response to M. Edney letter regarding proposal to sell specific properties only, including research regarding same; telephone conference with C. Thomas regarding [REDACTED]; review email from counsel for Grey Reed providing deadline for S. Bedoya to use in obtaining access to Quickbooks; lengthy call with counsel for Pioneer, lender on Venus properties; call with C. Thomas regarding same and draft response; call to Intuit; review recent mail and provide instructions to team about action steps as to all; review response filed by HGNH Turtle Creek and confer with C. Thomas regarding same; confer with C. Thomas regarding Barton's efforts to interfere with mail delivery; draft email to Barton counsel regarding same; email R. Marx as follow up requesting documents requested and promised yesterday; review insurance information regarding various properties and confer with team regarding strategy for same; confer with C. Thomas regarding [REDACTED]; review email from C. Koons regarding communications with new IT consultant retained by Barton and email a copy of the Receivership Order with instructions and to provide all necessary assistance to C. Koons in taking possession and control over data.	7.00	\$385.00	\$2,695.00
11/11/2022	SRL	Telephone calls to State Farm Insurance and First Insurance Funding regarding payments and cancellation status; analyze document production from JP Morgan Chase to determine open accounts and final balance information.	4.30	\$110.00	\$473.00

11/12/2022	TBW	Continue chart summarizing active litigation cases for initial status report.	3.60	\$200.00	\$720.00
11/14/2022	SRL	Review supplemental document production from JP Morgan Chase Bank.	2.10	\$110.00	\$231.00
11/15/2022	SRL	Review information received from banks and create summary chart of same to assist in preparations of Receiver's Initial Status Report; review title commitment on SF Rock Creek property and research Dallas County property records for UCC Financing Statement filed on 8/27/2020 and Abstracts of Judgment; review additional document productions from JP Morgan Chase Bank.	3.40	\$110.00	\$374.00
11/16/2022	SRL	Analyze document productions from banks to determine funds in accounts and entity ownership.	2.20	\$110.00	\$242.00
11/17/2022	CCK	Review information received regarding role of transferee and revise letter to same individual requesting information; confer with assistant regarding preparing template for Motion for Show Cause hearing regarding Barton's refusal to provide IT credentials; review response from D. Kelly regarding request to remove abstract related to Hodges litigation and forward same to different lawyer; review voicemail from additional Hodges' lawyer and return call; listen to voicemail from Chase and forward same to T. Wells; respond to additional email from counsel to Intuit; review message from counsel to Shaw, et al, creditors requesting information regarding claims process and potentially lifting the stay; respond to same; emails with Texas Brand Bank counsel regarding production of additional records, their efforts to sell their note on the Goldmark properties, and request for a call tomorrow to discuss proposal regarding CDs; email exchanges with T. Wells regarding [REDACTED]; confer with C. Thomas regarding [REDACTED]; [REDACTED]; confer with C. Thomas regarding [REDACTED]; further emails to counsel for Texas Brand Bank requesting account records for specific accounts; review same for Broadview account, received from Texas Brand Bank and confer with C. Thomas regarding same; review title commitment related to Ridgeview Addition received from Title Co and	4.50	\$385.00	\$1,732.50

respond to title co requesting additional information; return call from attorney representing Hodges group, who was requested to release judgment lien on Rock Creek property; review notice of appeal filed by T. Barton; review rules regarding stay pending appeal and confer with C. Thomas regarding same; respond to inquiry from judgment lien creditor regarding Barton's transfer of Rock Creek property to SF Rock Creek; confer with T. Wells regarding [REDACTED]; review and edit C. Thomas' initial status report and confer regarding same.

11/17/2022	SRL	Review additional production on accounts from JP Morgan Chase; organization of same; review file for deed information on 4107 Rock Creek Drive.	2.10	\$110.00	\$231.00
11/18/2022	CCK	Call with Texas Brand Bank to discuss KYC issues, their production, business rationale behind CDs as security, their proposal to sell their loan and why they think the Goldmark property has no equity, and proposal that we cash out CDs to stop interest accruing on the loan they secure; review email from attorney for S. Bedoya regarding default on the Navigator; confer with C. Thomas regarding [REDACTED]; email V. McMurry regarding same; review email for attorney representing lien creditor Romalia regarding judgment abstract; confer with C. Thomas regarding same; call with attorney representing judgment creditor Hodges also regarding abstract; brief research regarding scope/reach of abstract; call with C. Thomas [REDACTED]; forward 8 emails from creditor with attached documents to assistant; respond to email from Vendor regarding account that may be in M. Barton's name; brief research regarding [REDACTED].	2.60	\$385.00	\$1,001.00
11/18/2022	SRL	Research deed history of 4107 Rock Creek Drive to determine proper ownership by SF Rock Creek; prepare summary of same.	1.90	\$110.00	\$209.00
11/21/2022	CCK	Confer with assistant regarding document production received from lienholder on Ridgeview property; review and respond to email from Athas Capital about liens; confer with T. Wells regarding [REDACTED].	4.30	\$385.00	\$1,655.50

[REDACTED]; review email from Lion Group and forward same to T. Wells and C. Thomas; email team [REDACTED]; email exchanges with counsel for S. Bedoya regarding Lincoln issue; telephone conference with C. Thomas regarding [REDACTED]; review numerous emails regarding escrow funds and bank records, and one from interested investor/owner related to golf course property tied up in litigation; review sales contract for Rock Creek and confer with T. Wells regarding [REDACTED]; review notice of order issued in bankruptcy case and confer with assistant regarding filing notice of stay; review additional information received from Sendera Title regarding MXBA/Broadview transaction and confer with T. Wells regarding [REDACTED]; additional email communications with V. McMurry regarding payoff and possession of Lincoln; email counsel for Intuit, following up on requested Quickbook access; call with Intuit in-house assistant regarding same and email M. Ahuja and C. Thomas regarding access/credential for Quickbook; brief review of request/proposal for partial release/agreement to pay bank/secured creditor in Lumar Land deal and email C. Thomas regarding same; review bank records received from Texas Brand Bank regarding source of funds used to purchase CDs; email lawyer for Texas Brand Bank, responding to his inquiry about RO ¶ 15A and their intent to sell the note they hold secured by Amerigold Suites; request additional records regarding origin of funds on the CDs.

11/21/2022	TBW	Call with Republic Services regarding bill at Amerigold; call with Waste Management regarding bill at 2999 Turtle Creek; call with Magic Jack regarding receivership letter; emails to J. Lyssy regarding title documents; extensive review of documents relating to Gillespie Villas, LLC, Venus59, LLC, TRTX Properties, LLC, MXBA, LLC, and Titan Investments, LLC in preparation for motion to supplement entities; other miscellaneous correspondence and meetings regarding receivership. [Time reduced from 10.10 hours]	7.10	\$200.00	\$1,420.00
11/22/2022	CCK	Review insurance proposal for Amerigold and	3.70	\$385.00	\$1,424.50

confer with C. Thomas and T. Wells regarding same; review additional documents and information received from Texas Brand Bank regarding origin of funds used to purchase CDs; review financial statement for JMJ, evidencing \$12M in art and confer with C. Thomas regarding [REDACTED]; draft email regarding same to T. Barton's counsel; email conference with M. Ahuja regarding her efforts to access QB and her communications with Intuit regarding same; review and respond to email from US Trustee regarding motion to dismiss Wall bankruptcies; review extensive documents received from Texas Brand Bank regarding transactions in out and of Broadview account and Gillespie account; telephone conference with SEC regarding motion to intervene by creditor; confer with C. Thomas regarding same; continued research regarding [REDACTED]; review all recent mail and provide instructions regarding same.

11/22/2022	TBW	Supervise removal of personal items from Marx Law firm which had offices at 2999 Turtle Creek; located non-privileged documents at 2999 Turtle Creek to use as exhibits; review same; emails with J. Lyssy regarding closing documents for property transactions; call with B. Forshey regarding proposal; call with J. Morrelli regarding time to retrieve personal items from 2999 Turtle Creek and receivership claims process; call with First Insurance Funding to make payment for 4107 Rock Creek; other miscellaneous correspondence and meetings regarding receivership. [Time reduced from 10.5 hours]	7.30	\$200.00	\$1,460.00
11/23/2022	CCK	Review first appraisal on Rock Creek property; confer with assistant about prior correspondence with Wells Fargo, and lenders on Rock Creek; confer with C. Thomas regarding [REDACTED]; review Texas Brand Bank letter regarding same and draft email to counsel with counterproposal; review and respond to email from counsel for plaintiff against Barton and JMJ, stayed by receivership order; begin drafting Response to M. Barton Objection to motion to supplement RO, including close review of SEC's motion to appoint and research for analogous cases; email M. Ahuja regarding status	4.60	\$385.00	\$1,771.00

of Quickbook access.

11/25/2022	CCK	Review email from V. McMurry regarding possession/payment on the Lincoln Navigator in his possession and email C. Thomas regarding same; continue drafting response to M. Barton objection to motion to supplement.	1.90	\$385.00	\$731.50
11/28/2022	SRL	Research entity information on Overlook Phase II LP, Marine Creek SP LLC, LC Aledo TX LLC, TC Hall LLC, Titan 2022 Investments LLC, and MF Container LLC; research deed history for 3600 Gillespie in Dallas County property records; research property in Sevier County, Tennessee owned by Overlook Phase II, LP.	4.90	\$110.00	\$539.00
11/28/2022	TBW	Extensive review and classification of documents for use as exhibits to support Receiver's position that entities purported to be owned by M. Barton are actually receivership entities; draft summaries of findings from documents; call with TXU Energy regarding 2999 Turtle Creek and 4107 Rock Creek; email J. Moon regarding Ridgeview Addition; numerous emails to S. Latham, K. O'Rourke, C. Koonce; other miscellaneous correspondence and meetings regarding receivership. [Time reduced from 11.7 hours]	7.10	\$200.00	\$1,420.00
11/29/2022	SRL	Review Barton entities formation documents and company agreements for information to assist C. Koonce with preparation of Receiver's Reply to Max Barton's Response to Receiver's Motion to Supplement Order Appointing Receiver; emails with L. Cox at Happy State Bank regarding no accounts found after review of additional entities information.	1.30	\$110.00	\$143.00
11/29/2022	TBW	Continue extensive review of documents to use as exhibits to support Receiver's position that the Additional Entities are Receivership Entities; transition Amerigold Square account to new Goldmark bank account; email to J. Sowka regarding Home Depot invoices; email B. Statfeld regarding iPostal1 response to creditor letter; emails with E. Chou and B. Forshey regarding Lumar Land; email M. Gill and B. Guerrero regarding loss runs for Amerigold Suites; call with TXU regarding power at 2999 Turtle Creek and 4107 Rock Creek; begin revising motion to appoint appraisers, accept appraisals and set hearing for sale of Rock Creek property; other miscellaneous	7.20	\$200.00	\$1,440.00

		correspondence and meetings regarding receivership. [Time reduced from 11.9 hours]			
11/30/2022	SRL	Review property records in Sevier County, Tennessee for information on property owned by Overlook Phase II; research Mack (Overlook I) LLC and Mack (Overlook II) LLC.	1.90	\$110.00	\$209.00
11/30/2022	TBW	Finish reviewing documents to use for exhibits in disputed and additional entities motion; begin creating list of payments for entities; finish revising motion to appoint appraisers, accept appraisals and set hearing for sale of Rock Creek property and order for same; review and revise motion for disputed and additional entities; review and revise C. Thomas declaration; emails with J. Richards regarding DWU termination letter at 4107 Rock Creek; call and follow up email with D. Cromwell regarding Louisiana National Bank loan and TC Hall; email to C. Koonce and C. Thomas regarding [REDACTED]; emails to D. Graham regarding Sunridge Management payment of invoice for property tax dispute; other miscellaneous correspondence and meetings regarding receivership. [Time reduced from 9.8 hours]	5.90	\$200.00	\$1,180.00
12/01/2022	SRL	Research correspondence and contracts on 4107 Rock Creek property; research Farmer, Fuqua, & Huff accounting firm; prepare, finalize and transmit letter to American Express; assist C. Koonce with preparation of appendix and exhibits for filing with Receiver's Motion for Appointment of Appraisers, Approval of Appraisals and Setting Hearing for Approval of Sale.	3.20	\$110.00	\$352.00
12/01/2022	CCK	Email communications with C. Thomas regarding [REDACTED]; confer with T. Wells regarding [REDACTED]; review photos in appraisal included in Barton's recent filing and draft email to Roper regarding same and IT issues; draft email to realtor who previously listed the Rock Creek property requesting photos; telephone conference with C. Thomas regarding [REDACTED]; email exchange regarding conference on motion to intervene by Pallisades; respond to email from TX Brand Bank; confer with T. Wells regarding [REDACTED]; further calls with C. Thomas (x2) regarding [REDACTED]	4.80	\$385.00	\$1,848.00

		<p>[REDACTED]; continue drafting motion to appoint appraisers, etc and proposed order; confer with all counsel regarding same; confer with counsel in stayed litigation about their request to confer about motion to lift stay;</p>			
12/02/2022	CCK	<p>Review C. Thomas [REDACTED]; further edits to Motion to Appoint, Approve and set hearing, including additional edits to C. Thomas Dec, and instructions to assistant regarding modifying Appendix in support; review recent mail (extensive) and provide instructions regarding responding to same, including providing premium notice for performance bond on Marine Creek property to E. Espinosa, conferring with C. Thomas regarding [REDACTED]; review C. Thomas dec ISO motion to appoint appraisers; [REDACTED]; draft template for partial release of lien/abstracts and forward to S. Latham for addition content; [REDACTED]; respond to inquiry from realtor about request for photos/staging of Rock Creek Property (re art previously located in the residence); review summary of call between T. Wells and attorney for defendant in pending (stayed) case regarding status, issues, and request to resolve same; further revisions to partial releases for Judgement Creditors re their Abstracts and Rock Creek Property; review and revise letters to creditors; review C Thomas email [REDACTED]; review proposed contract rec'd from auctioneer; confer with S. Latham regarding filing Motion to appoint appraisers; respond to email from accountant regarding access to QB, and confer with C. Thomas regarding same; forward draft Partial Release of Judgment Lien to title co for approval before sending to Judgment Creditors; return call from lawyer for former realtor on Rock Creek property; review recent filings in BR matter that is stayed and confer with S. Latham to confirm stay and provide contact info for lawyers who filed</p>	6.50	\$385.00	\$2,502.50

in violation of the stay; lengthy email to T. Wells regarding [REDACTED]; respond to email from accountant regarding [REDACTED]; draft email to lawyers who filed motion in stayed case; draft letter terminating listing agreement with prior realtor as requested; review and revise multiple letters to various lenders, creditors, and others reflected in recent mail; email correspondence with Judgment Creditors who filed Abstracts, requesting release of liens for same regarding Rock Creek sale;

12/05/2022	CCK	Continued review of auction contract and email exchange with C. Thomas regarding same; call with attorney for seller that contracted with Titan regarding T Barton's control regarding same; call with Barton's counsel regarding Opelika/HUD issues, personal property, IT/servers and privilege issues, and appraisals of art; call with T. Wells regarding [REDACTED]; call with auction company regarding proposed edits to their contract; review additional documents rec'd from seller in Titan transaction; forward vm from Am Ex to T. Wells to return; [REDACTED]; draft email to Barton's counsel regarding proposed disposition of contents in Rock Creek property; review order setting hearing on property sale and confer with C. Thomas regarding same	3.10	\$385.00	\$1,193.50
12/05/2022	TBW	Call with D. Cromwell regarding Louisiana National Bank; respond to email from P. Clarens regarding Porsche information; call and follow up email to B. Ramcharitar regarding American Express response to letter; respond to email from C. Moore regarding Amerigold insurance inspection; call and following email with Simplex regarding ownership of copy machines at 2999 Turtle Creek; call with D. Rollins, C. Koonce, and L. Pedigo regarding Texas Brand Bank; continue drafting Response to Motion to Stay; other miscellaneous correspondence and meetings regarding receivership. [Time reduced from 7.9 hours]	5.60	\$200.00	\$1,120.00
12/06/2022	CCK	Annotate and edit hard copy of auction agreement	2.40	\$385.00	\$924.00

and return to auctioneer; confer with C. Thomas regarding [REDACTED]; email M. Ahuja regarding [REDACTED]; respond to email from K. Walji regarding information he is sending related to pending cases; draft lengthy email responding to inquiry from judgment creditor from whom release of lien is requested; draft follow up email to Hodges, second judgment creditor regarding same; confer with C. Thomas regarding [REDACTED]; review and confer with C. Thomas about [REDACTED]; confer with C. Thomas regarding [REDACTED]; email conference with S. Latham regarding Region Bank's request for new subpoena; telephone conference with A. Hodges regarding scope and negotiations regarding execution of Release of Lien; review comments/push back from auctioneer regarding changes to contract and confer with C. Thomas regarding [REDACTED];

12/06/2022	SRL	Review bank productions and mail received from banks for information on existing bank accounts.	1.40	\$110.00	\$154.00
12/06/2022	TBW	Continue drafting Response to Barton's Motion to Stay; research standard for stay in Fifth Circuit; review C. Thomas initial status report for information regarding debt, value, and management of receivership properties; review appendix ISO Barton's Motion to Stay; multiple calls with TXU to pay deposit for Receivership accounts at 2999 Turtle Creek and 4107 Rock Creek; email to J. Richards regarding DWU bill at Amerigold Suites; other miscellaneous correspondence and meetings regarding receivership. [Time reduced from 9.7 hours]	6.80	\$200.00	\$1,360.00
12/07/2022	CCK	Confer with team regarding [REDACTED]; review settlement agreement with DLP and confer with C. Thomas regarding same;	6.50	\$385.00	\$2,502.50

follow up with J. Kane (3rd time) regarding request for wire and payment documents; very lengthy call with attorneys for P. Kirby (creditor) regarding issues pertaining to victim status and tax write-off, lifting the stay, and participation in receivership case; call with C. Thomas regarding proposed edits to DLP agreement, response to motion to stay, and call with Kirby attorneys; review email from Barton's counsel regarding HUD docs, personal property, priv protocol, etc.; confer with assistant regarding [REDACTED]; confer with T. Wells regarding [REDACTED]; email exchanges with K. Walji regarding his conference related to additional representations; call counsel for auctioneer; LM; review T. Wells summary and questions regarding mail and respond to same; begin review and revisions to draft response to motion for stay

12/07/2022	SRL	Prepare correspondence to Regions Bank regarding Supplemental Order and search for additional accounts; telephone call with B. Armstrong at Regions Bank legal department regarding Supplemental Order and additional Receivership Entities.	0.90	\$110.00	\$99.00
12/07/2022	TBW	Finish drafting response to Barton's Motion to Stay; respond to emails from C. Schwartz regarding receivership claims process; call with J. Silvasan regarding Amerigold Propertyware software bill; call with Propertyware to resolve frozen account at Amerigold; emails to K. O'Rourke to cut checks for Amerigold HVAC bills and payroll; review mail forwarded from receivership UPS box; email to C. Koonce and C. Thomas [REDACTED]; email to D. Rollins regarding Goldmark loan at Texas Brand Bank; other miscellaneous correspondence and meetings regarding receivership. [Time reduced from 8.4 hours]	5.90	\$200.00	\$1,180.00
12/08/2022	TBW	Prepare for Zoom call regarding BM318 and Lumar Land; participate in Zoom call with Forshey Prostok and QSLWM regarding BM318 and Lumar Land; research on [REDACTED]; create template for C. Thomas declaration in support of	6.90	\$200.00	\$1,380.00



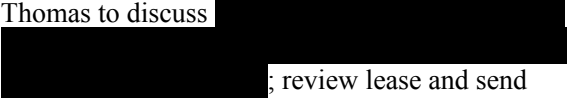
Response to Barton's Motion to Stay; search through compiled documents for [REDACTED]; research cases [REDACTED]; research on [REDACTED]; email to C. Koonce detailing [REDACTED]; other miscellaneous correspondence and meetings regarding receivership. [Time reduced from 9.9 hours]

12/09/2022	TBW	Review information sent from Porsche and draft email to C. Koonce and C. Thomas regarding details; review and revise Response to Barton's Motion for Stay; review and revise C. Thomas declaration in support of Response to Motion to Stay; draft Notice of Intended Sale of Personal Property; call and follow up email to B. Ziel regarding Waste management bill; review letters from K. Walaji; other miscellaneous correspondence and meetings regarding receivership. [Time reduced from 7.6 hours]	5.30	\$200.00	\$1,060.00
------------	-----	--	------	----------	------------

12/12/2022	CCK	Review emails from C. Thomas and telephone conference regarding [REDACTED]; revise draft emails [REDACTED]; revise motion to ratify and forward same to C. Thomas, draft email J. Lindauer; and respond to her reply; meet with C. Thomas and T. Wells to discuss [REDACTED]; review summary of default and lien status rec'd from creditor; email exchange with counsel for Intuit regarding obtaining access to additional QB accounts; draft/revise orders for Motion to Ratify and Motion re sale of personal property; respond to request for extension from Barton's counsel regarding response to motion to appoint; review draft motion and order regarding same; forward notice to Barton's counsel regarding cancellation of health insurance; revise Notice of Sale of personal furnishings in Rock Creek property and forward	6.30	\$385.00	\$2,425.50
------------	-----	---	------	----------	------------

		<p>same to all counsel, conferring regarding same; review information provided by Pioneer, secured lender on Venus properties and confer with C. Thomas and T. Wells regarding [REDACTED]; close review of proposed agreement with Lumar Land to allow sale of certain properties in satisfaction of bank lien; provide redline edits of same and comments to C. Thomas; review responsive email from Intuit and confer with C. Thomas regarding same; review revised Partial Release of Lien rec'd from Romalia and confer with C. Thomas regarding same; forward same to title company for review and confirmation that it will suffice; email R. Marx regarding status of document production; begin drafting Response to HGNH motion to intervene/resolve ownership issue</p>			
12/12/2022	SRL	Research Tarrant County Appraisal District and Tarrant County Property Records for information on property potentially owned by D4MC LLC.	0.70	\$110.00	\$77.00
12/13/2022	SRL	Review documents on transaction between Ridgeview Addition, LLC and LCH Holdings, LLC for plat.	0.90	\$110.00	\$99.00
12/14/2022	SRL	Research 2019 Tesla leased by JMJ Development; research deed history of 3407 and 3409 N. Hall in Dallas County.	0.80	\$110.00	\$88.00
12/15/2022	SRL	Research correspondence with banks to determine status of response, accounts, and productions.	0.90	\$110.00	\$99.00
12/16/2022	SRL	Continue review of correspondence with banks and productions received from banks and update chart of same; review Dallas County Real Property Records for Notice of Lis Pendens filed by T. Barton; prepare correspondence to Prosperity Bank transmitting supplemental orders and requesting account information.	2.90	\$110.00	\$319.00
12/16/2022	CCK	<p>Research regarding [REDACTED]; review Notice of Lis Pendens rec'd from title company and confer with C. Thomas regarding same; research regarding [REDACTED]; confer with counsel for Barton regarding same and draft motion to declare LP void; draft order regarding same; review message from Rock Creek Lender regarding refusal to forego pre-payment</p>	6.60	\$385.00	\$2,541.00

		penalty and confer with title company regarding whether they will close the sale and hold the lender's funds in escrow; confer with C. Thomas regarding [REDACTED]; confer with T. Wells regarding [REDACTED]; begin drafting factual section of Response to Motion to Stay, anticipated in Fifth Circuit on Monday			
12/16/2022	TBW	Call and follow up emails with K. Pitts regarding information needed from Regions Bank; review bank master sheet for responses received or missing from banks; participate in zoom call with counsel for Lumar Land regarding revisions to draft of partial release and agreement for BM318 suit; draft letter to AT&T regarding service to receivership entities; call with K. Seabolt regarding capital Title documents; review documents received from Capital Title; continue revising Motion to appoint appraisers and accept appraisals for Frisco Property; call with A. Filipovic regarding 2999 Turtle Creek; other miscellaneous correspondence and meetings regarding receivership. [Time reduced from 8.1 hours]	5.60	\$200.00	\$1,120.00
12/19/2022	SRL	Prepare draft Release of Notice of Lis Pendens on 4107 Rock Creek property; review case file for existence of accounts at Prosperity Bank; research Ellis County Clerk records to determine foreclosure on 49 acre tract.	0.90	\$110.00	\$99.00
12/19/2022	CCK	Review all filings related to motion to sell, including order entered Friday evening; confer w/ C. Thomas regarding [REDACTED]; review Barton's response to motion to declare lis pendens void and brief research regarding same; travel to courthouse, argue motion, confer with C. Thomas regarding [REDACTED]; return to courthouse; return call from title company; email lender on Rock Creek requesting contract; review email from seller re specific Ellis County property requesting confirmation of termination; review contract documents and confer with C. Thomas regarding same; confer with C. Thomas regarding [REDACTED]; call with Title Company regarding status of sale on Rock Creek; email exchange with lender regarding same; research regarding [REDACTED]; confer with C. Thomas regarding	7.90	\$385.00	\$3,041.50

		 ; review mail issues and confer with T. Wells about responding to same;			
12/20/2022	CCK	Review and revise motion to appoint appraisers regarding Frisco property and confer with C Thomas regarding same; review email from counsel for DLP regarding bond issue and confer with T. Wells regarding same; continue research regarding  ; Confer with lender regarding pre-payment penalty and confer with C. Thomas regarding same; review revised agreement with Lumar land and confer with T. Wells regarding same; review response to motion to ratify DLP agreement and supporting appendix; email C. Thomas conferring about same; email exchange with lender regarding their agreement to compromise on the pre-payment penalty; email order approving sale of Rock Creek to title company, and status of sale	2.90	\$385.00	\$1,116.50
12/20/2022	SRL	Prepare draft Petition to Interplead Funds Into the Registry of the Court [no charge]; draft Release of Lis Pendens for filing in Ellis County. [Time reduced from 1.4 hours]	0.60	\$110.00	\$66.00
12/20/2022	TBW	Meet with B. Rowlett, R. Marx, J. Morrelli, and M. Barton supervise removal of personal items form 2999 Turtle Creek; call with First Insurance Funding to pay Gillespie insurance loan; review documents from B. Forshey and E. Chou for Lumar Land and BM318 negotiation; email to M. Taylor responding to questions about Amerigold suites; emails to J. Silvasan regarding Amerigold suites; email to counsel for M. Barton with notice received in mail; other miscellaneous correspondence and meetings regarding receivership. [Time reduced from 8.2 hours]	7.10	\$200.00	\$1,420.00
12/21/2022	CCK	Email exchange with title company and lender regarding amended closing statement; call with C. Thomas to discuss  ; review lease and send proposed edit; review Lumar Land contracts and confer with T. Wells regarding same; email court reporter asking with Barton has requested transcript; draft detailed email to all counsel	5.50	\$385.00	\$2,117.50

confering about sale of Frisco property providing specific information about appraisals and sale terms; calls with C. Thomas to discuss [REDACTED]

[REDACTED]

[REDACTED]; research regarding [REDACTED]

[REDACTED];

confer with C. Thomas regarding same; continue drafting MSC started by M. Buller regarding multiple issues, including interference with Rock Creek sale, etc.

12/22/2022	CCK	Email to counsel regarding cancellation of Rock Creek Sale, and wire instructions for payment of sanctions; continue drafting MSC; confer with SEC regarding motion to approve sale; and confer with assistant regarding completing certificate of conference for motion to approve sale of Frisco property; review payoff from lender and communicate with lender and title company regarding cancellation of closing for Rock Creek; email broker who had listed Rock Creek for Barton (2nd time) requesting disclosures; respond to email from counsel for S. Bedoya requesting confirmation of employment	2.20	\$385.00	\$847.00
12/28/2022	CCK	Review emails from C. Thomas regarding [REDACTED]; email USTEE for ND regarding same and email C. Thomas regarding motion set in EDTX; review additional email from USTEE regarding same; respond to email from counsel for Rice LLC; review Barton's motion to stay; respond to conference on same; confer with T. Wells regarding [REDACTED]; email court reporter requesting transcript of 12/19 hearing; call with DLP counsel regarding motion to stay, etc.; call to confirm wire instructions with DLP; draft response to motion to stay and confer with C. Thomas regarding [REDACTED]	6.30	\$385.00	\$2,425.50
12/29/2022	CCK	Review Barton's motion to stay filed in the COA and confer with C. Thomas regarding [REDACTED]; confer with T. Wells regarding [REDACTED]; continue drafting Response to Motion to Stay DLP Settlement and confer with C. Thomas regarding same; call with interested party	7.60	\$385.00	\$2,926.00

regarding Frisco Property; call with SEC regarding motion to stay; begin drafting Response to same

Quantity Subtotal 341.3

Subtotal \$91,812.00

SEC v. Barton – Non-Receiver Activity: Case Administration

Date	Initials	Description	Hours	Rate	Client Total
10/17/2022	CCK	<p>Confer with C. Thomas [REDACTED]</p> <p>[REDACTED]</p> <p>confer with assistant regarding [REDACTED]</p> <p>[REDACTED]</p> <p>review summary of known banks used by Receivership Entities; revise BF engagement agreement for receivership; draft employee questionnaire; confer with assistant [REDACTED]; review most recent filings in the related bankruptcy case, including Trustee's motion to dismiss; [REDACTED]</p> <p>[REDACTED]</p> <p>[REDACTED] review docket from bankruptcy appeal in which JMJ is defendant/appellant and confer with assistant regarding notice of stay for same.</p>	6.70	\$385.00	\$2,579.50
10/20/2022	SRL	<p>Finalize and file Notice of Appointment of Receiver in Western District of Tennessee; prepare and finalize letters to various district courts in Florida, Alabama, Tennessee, Michigan, and Nevada regarding Notice of Appointment of Receiver; telephone calls with courts regarding same; review filing of Notice of Appointment of Receiver in Southern District of Alabama and emails with F. Zakermosala regarding same; confer with C. Koonce regarding defendant entities and change of addresses for same; review list of entities owned by Barton; research mailing addresses of Barton entities.</p>	5.70	\$150.00	\$855.00
10/20/2022	TBW	<p>Call and follow up email with K. Taylor regarding claims process between Goldmark and Stream Energy; email to C. Koonce regarding discussions</p>	0.60	\$200.00	\$120.00

of same.

10/21/2022	CCK	Continue drafting motion to supplement and Thomas Dec in support; confer with assistant regarding locating attorney in MI who can file § 754 notices; confer with T. Wells regarding [REDACTED]; email accountants requesting engagement agreement; confer with S. Latham regarding [REDACTED]; Telephone call with C. Thomas regarding [REDACTED]; respond to email from vendor/developer regarding meeting to discuss one development project that is on-going; return calls from 5 lawyers regarding stay, pending matters, and status regarding same (extensive); return call from K. Walji; review lengthy emails from additional attorneys; call with Regions bank; confer with S. Latham regarding s [REDACTED] review engagement agreement with accountants.	6.20	\$385.00	\$2,387.00
10/21/2022	TBW	Determine management companies for Parc at Ingleside, Parc at Windmill Farms, Bellwether Ridge, and Parc at Opelika; call with P. Wilson at Sunchase American (Windmill Farms & Opelika); emails to P. Wilson with receivership order and request for financials; call with K. Taylor, attorney for Stream Energy; call with S. Yoh at SunRidge Management (Bellwether & Ingleside); emails to S. Yoh with receivership order and request for financials; email to C. Wright regarding Parc at Ingleside; numerous emails to C. Koonce and C. Thomas with updates; other miscellaneous correspondence and meetings regarding receivership. [Time reduced from 7.3 hours]	5.10	\$200.00	\$1,020.00
10/23/2022	TBW	Draft motion to lift litigation stay in Wall bankruptcy cases; create proposed order for same.	1.20	\$200.00	\$240.00
10/24/2022	CCK	Confer with assistant regarding sending letter to S. Metzger; meet with C. Thomas and T. Wells regarding [REDACTED]; review and respond to multiple emails from lawyers handling litigation for Receivership Entities or adverse to same, and forward information regarding same to T. Wells; meet with C. Thomas and V. Barton; email exchanges with E. Espinosa regarding meeting to discuss Marine Creek development; emails with	8.20	\$385.00	\$3,157.00

assistant regarding [REDACTED]; review letter rec'd from SEC regarding correspondence with the Court; review correspondence from attorney regarding Somerset Lost Creek Golf; confer with T. Wells regarding [REDACTED]; call with R. Roper, counsel for defendants regarding motion to supplement and entities that might need to be omitted; confer with C. Thomas regarding same; review correspondence from Wells Fargo regarding request for EINs for all entities and confer with T. Wells regarding same; forward list of same to WF; confer with assistant regarding [REDACTED]; review motion to withdraw filed by counsel for one Receivership Entity and confer with counsel regarding stay; review and edit list of proposed additional entities, searching binder information to confirm certain entities should or should not be included as requested by Barton's counsel; review email from C. Thomas regarding [REDACTED]; review binders of information regarding specific entities flagged by R. Roper for exclusion from motion to supplement and email R. Roper regarding same; revise list of additional entities for inclusion in Receivership Order; confer with C. Thomas regarding [REDACTED]; review lengthy message from substitute trustee confirming cancellation of foreclosure sale; further telephone conference with R. Roper regarding entities included on supplemental list, assets; review documents produced by Wall; return call from counsel for creditor/bank.

10/24/2022	SRL	Letter to counsel and voicemail from S. Metzger regarding Order Appointing Receiver and status; emails with J. Perez regarding Notice of Appointment of Receiver for Southern District of Florida; emails with J. Grekin regarding Notice of Appointment of Receiver for Eastern District of Michigan; review confirmation of receipt of Order Appointing Receiver from Capital One Bank's legal department; review filed Notice of Appointment in Southern District of Florida; prepare and file Receiver's Notice of Stay in cases in Harris County, Dallas County, 2nd Court of Appeals, and Northern District of Texas	5.40	\$110.00	\$594.00
------------	-----	--	------	----------	----------

		Bankruptcy Court; telephone call with D. Rollins, counsel for Texas Brand Bank, regarding status of entity accounts; emails with K. Phillips at PNC Bank regarding status of accounts; prepare exhibits for Motion to Supplement Receivership Order.			
10/24/2022	TBW	Meeting with C. Koonce and C. Thomas [REDACTED]; review Ingleside financials from C. Wright; research utility providers for 2999 Turtle Creek and 4107 Rock Creek; call with G. Werley regarding stay in litigation; email to J. Taylor contacting Vista Bank; call with J. Roberts regarding Amerigold Suites; call with C. Rice regarding stay in litigation; research 3926 Vista Woods owner; call and follow up emails with D. Graham; emails to M. Cooper and B. Kyles sending receivership order; other miscellaneous correspondence and meetings regarding receivership. [Time reduced from 9.2 hours]	5.50	\$200.00	\$1,100.00
10/25/2022	CCK	Review ECF filing information for several cases in which we filed notices of stay; confer with assistant regarding [REDACTED]; review research [REDACTED]; review and respond to email from Region's bank requesting additional information; review email from Defendant Wall regarding conference on motion to supplement and information provided in same; call with counsel for Texas Brand bank (lengthy); email counsel for Defendants regarding identifying operating account for Goldmark properties to ensure employees are paid through that account; call with C. Thomas regarding developments, meeting with Fu; email exchanges with T. Wells regarding [REDACTED]; review additional information received from Wall regarding control over entity proposed for inclusion in the supplemental order; review proposed motion to stay as a conference on a bankruptcy matter and propose alternative language regarding the receiver's position; review new information about Lynco Ventures; confer with all parties regarding inclusion of same and modification of list to exclude two Wall entities; review information received from R. Roper regarding Vista Bank as the bank for Goldmark from which employees are paid; forward message from two banks to S.	10.30	\$385.00	\$3,965.50

Latham to respond; reply to Vista email regarding call today to discuss operating account for Goldmark/Amerisuities; confer with C. Thomas regarding [REDACTED]; review messages from Fu and Wall counsel regarding no opposition to motion to supplement; revise cert of conference regarding same; review engagement agreement from Veracity regarding IT support and send redline edits to C. Thomas for negotiations regarding same; review email from T. Wells regarding [REDACTED]; review information received from Sendera regarding two additional loans (on Gillespie and SF Rock Creek) that closed in August; request wire instructions related to disbursement of proceeds for same; review additional information received from Texas Brand Bank regarding recent disbursements from T. Barton accounts; edits to BF engagement agreement and motion regarding same to include VF; review additional information rec'd from Sendera regarding disbursement and entities involved in two August loan transactions; review response from PNC regarding no accounts; call with C. Thomas to discuss [REDACTED]; email Roper regarding mail change discovered for one receivership entity and confirming meeting with M. Barton; lengthy call with Vista Bank regarding Goldmark accounts, payroll account, issue; confer with C. Thomas regarding [REDACTED]; respond to email from counsel for Chinese creditors; lengthy call with counsel for Barton regarding supplemental list of entities, assets, mail issues, and meeting with M. Barton; continued review of entity information for entities challenged by Barton as appropriately included in supplemental list; review information received from lender regarding potential purchaser for FHC Acquisition; call with C. Thomas to discuss [REDACTED]; email assistant regarding [REDACTED]; brief review of information received from Vista Bank regarding Goldmark accounts and provide summary regarding operating account to C. Thomas; draft email to all defense counsel regarding production required by ¶ 18B; review revised Veracity Forensic agreement and

		incorporate changes regarding same into motion; revise order regarding same.			
10/25/2022	SRL	Prepare and transmit letter to R. Phelan, attorney for debtor 2999TC Acquisitions, LLC, P. Keiffer as attorney for FM 544 Park Vista Ltd., G. Barber as attorney for TRTX Properties LLC, J. Postnikoff as attorney for FM 544 Park Vista Ltd., D. Morenoff as attorney for T. Barton; prepare and file Notice of Appointment of Receiver in the Eastern District of Michigan; telephone call to PNC Bank regarding account status; telephone call and letter to TXU regarding Order Appointing Receiver; prepare and transmit letter to Alamo Title; research regarding Stratford Ventures, LLC; research regarding JMCR Sherman LLC and JMCR Buckhead, LLC.	3.40	\$110.00	\$374.00
10/25/2022	TBW	Email to S. Yoh; call with K. Fonville regarding litigation stay; numerous emails with Sendera Title; call with S. Metzger, call with A. Hodges; call with M. Cooper; review documents looking for additional properties; research on 3600 Gillespie; review financials from Opelika; email to D. Graham; revise letter to Alamo Title; review letter to TXU; numerous emails to C. Koonce and C. Thomas providing updates; other miscellaneous correspondence and meetings regarding receivership. [Time reduced from 8.1 hours]	4.90	\$200.00	\$980.00
10/26/2022	SRL	Research status of filings of Notices of Appointment of Receiver in district courts of Tennessee, Florida, Alabama, Nevada and Michigan; obtain and review filed copies of same; telephone calls with U.S.D.C. Middle District of Tennessee and Middle District of Florida regarding Notice of Appointment of Receiver; research regarding [REDACTED]; telephone call to JP Morgan Chase Bank Court Orders and Levies department regarding status of accounts; email to Capital One Bank regarding status of accounts; telephone call and email with L. Cox regarding status of accounts at Happy State Bank; telephone call and email with J. Lewis at First Guaranty Bank; review documents from First Guaranty Bank; prepare letter to Commonwealth Title of Dallas regarding land transactions for Turtle Creek Tower, LLC and Stratford Ventures, LLC; prepare letter to State Farm regarding loss claim.	4.20	\$110.00	\$462.00
10/26/2022	CCK	Email with Roper confirming time for meeting	9.60	\$385.00	\$3,696.00

today; continued review of information regarding entities to determine control over entities challenged by Barton as within his control, particularly entities related to Max Barton; draft summary email to team regarding same; confer with T Barton regarding email from Vista Bank regarding allowing charges for today and going forward; review emails regarding HUD draw due on AL project; draft list of topics for conversation with Max and Roper today; confer with S. Latham regarding [REDACTED]; meet and confer with T. Wells and C. Thomas to discuss [REDACTED]; confer with assistant regarding [REDACTED]; circulate same to all counsel for conference on motion; call with SEC regarding question related to motion to engage; review certain mail and confer with assistant regarding [REDACTED]; review file confirmation for 754 notices; telephone conference with Roper to discuss agenda for meeting with Max; review email from C. Thomas to lender on AL property (Parc @ Opelika) regarding draw; meet with C. Thomas, Roper and Max Barton to discuss issues related to operating Goldmark, entities to include in the receivership, development status, etc.; email accountant regarding calculating withholding for payroll for Goldmark employees; confer with T. Wells regarding [REDACTED]; review final email regarding conference on motion to approve engagements and confer with assistant regarding filing same; confer with C. Thomas regarding [REDACTED]; email Roper requesting additional information regarding same; confer with assistant regarding [REDACTED]; call with counsel for Saskya Bedoya; forward information provided by same to C. Thomas and team

10/27/2022	CCK	Review C. Thomas edits to motion to establish admin procedures; further edits and drafting on same; draft order; email exchanges with Region's bank and C. Thomas regarding their request for notarized letter authorizing them to release information to me; email J. Lindauer regarding status of delivery of requested information; email	6.10	\$385.00	\$2,348.50
------------	-----	--	------	----------	------------

S. Latham regarding [REDACTED]; confer with C. Thomas regarding [REDACTED]; update list of information needed from T. Barton through Roper; communicate with lender on Goldmark property regarding insurance; communicate with Roper and lender on Frisco regarding additional entity that may have contractual rights; call with C. Thomas regarding [REDACTED]; call with Regions Bank and emails with C. Thomas regarding their request for a notarized letter authorizing disclosure of information to me; review bills/notices regarding Goldmark and communicate with T. Wells regarding same; call and text to Bella, employee who was handling multi-family developments; review research regarding multiple supplemental entities to include in motion to supplement rec'd from S. Latham and confer with Roper regarding same; access through multiple steps, information received from the SEC in response to access request and initiate download of same; multiple email communications with T. Wells regarding [REDACTED].

10/27/2022	TBW	Supervise retrieval of personal items from 2999 Turtle Creek; review documents at 2999 Turtle Creek in attempt to locate missing entity EINs and insurance information for Amerigold Suites; calls with individuals coming to retrieve items; emails with property management companies; call with B. Armstrong regarding insurance for Amerigold Suites; other miscellaneous correspondence and meetings regarding receivership. [Time reduced from 9.6 hours]	6.70	\$200.00	\$1,340.00
10/28/2022	CCK	Call with C. Thomas regarding [REDACTED]; confer with T. Wells regarding [REDACTED]; review numerous emails from lawyers representing parties in various stayed cases; email from insurance company regarding request for claim information; revise letter to Louisiana Nat'l Bank; confer with T. Wells regarding [REDACTED]; confer with assistant regarding [REDACTED].	2.90	\$385.00	\$1,116.50

[REDACTED]; confer with T. Wells regarding [REDACTED]
 [REDACTED]; confer with C. Thomas regarding [REDACTED]
 [REDACTED]; review email from interested party regarding purchasing three properties and respond regarding inclusion of same in Receivership Order; confer with C. Thomas regarding [REDACTED]
 [REDACTED]; continue edits to motion to establish admin procedures; continue updating supplemental list of Receivership Entities to circulate with renewed conference on motion to supplement, checking confirmation information for several entities.

10/29/2022	TBW	Call with B. Armstrong regarding Amerigold Suites insurance; call with D. Rollins regarding same.	0.50	\$200.00	\$100.00
10/30/2022	CCK	Review information regarding Carnegie Development, Inc.; continue revising list of supplemental entities, motion and order regarding same; confer with assistant regarding [REDACTED]; begin review of NDA proposed by interested purchaser of various properties and email C. Thomas regarding concerns about same.	0.70	\$385.00	\$269.50
11/01/2022	CCK	Review C. Thomas edits to motion to supplement; conform C. Thomas Dec; forward all to assistant for filing with instructions about updated exhibits; review and update letter to recent purchasers of Barton properties, and provide instructions to assistant regarding same; confer with S. Latham regarding notices of stay; confer with C. Thomas regarding [REDACTED]; confer with team regarding [REDACTED]; review statement for Venus 59 account received from Vista Bank; review yesterday's mail and provide instructions to team [REDACTED]; review emails from C. Thomas regarding [REDACTED]; review [REDACTED]	7.40	\$385.00	\$2,849.00

information pulled by S. Latham regarding same; call to Trustee on DJD Land property previously set for foreclosure to confirm stay/passed sale; email same requesting relevant documents; Telephone conference with SEC regarding questions related to the motion to approve admin procedures; call with C. Thomas to discuss [REDACTED]; confer with assistant to obtain contact information for prosecutor in Barton matter to discuss document destroy window proposed in motion for admin procedures; draft motion to vacate/stay Adversary (removed from Collin County state case) and confer with assistant regarding [REDACTED]; brief review of transaction documents rec'd from paralegal for Trustee on DJD Land deal/ foreclosure; forward same to S. Latham to unravel; call US Attorney regarding proposed destruction of documents; revise letters to creditor/lenders discovered in recent mail and provide instructions to assistant regarding same; review email from potential buyer regarding their request for NDA and respond to same; call with C. Thomas regarding [REDACTED]; review order requiring expedited response to motion to supplement; review email from counsel for Texas Brand Bank regarding request to offset/compromise regarding their secured loans; respond to same; review correspondence from attorneys who previously represented JMJ entities and Barton individually; further email conferencing on motion to vacate, responding to email from counsel for defendants (x2); confer with C. Thomas regarding same; update conference on motion regarding same; review status chart regarding notices of stay and confer with S. Latham regarding same; review email from attorney in state court proceeding stayed requesting lift stay and confer with T. Wells regarding response to same; review email from counsel for S. Bedoya regarding roof repair on Rock Creek property and confer with assistant regarding sending vendor letter to contractor; brief review of letters received from M. Edney regarding privilege and response issues and confer with C. Thomas regarding same.

11/01/2022	SRL	Prepare draft Notice of Stay in Adversary Proceeding 22-04028; audit status of Notice of Stay filings in all pending cases; audit responses received from banks in response to demand letters.	4.20	\$110.00	\$462.00
------------	-----	--	------	----------	----------

11/02/2022	CCK	<p>Review and respond to multiple emails from assistant regarding [REDACTED]; respond to inquiry from T. Wells regarding [REDACTED]; meet with M. Fu and counsel to discuss communications with, manner of investment by, Chinese investors, and documentation in his possession that will assist with claims process; review notice of depo filed in stayed case; respond to all counsel regarding same; review insurance information provided by bank re Goldmark property and forward same to C. Thomas; email Roper regarding; review yesterday's mail and provide instructions regarding [REDACTED]; email counsel for S. Bedoya regarding her possession of an Audi on which JMJ paid/pays the note; review email from Truist bank and forward same to assistant to provide additional information as requested; forward bills/invoices to Roper to provide to Max; call with US attorney regarding conference on their motion to stay and destruction of documents proposed in our admin procedures; review US Attorney's motion to stay; confer with C. Thomas regarding same and [REDACTED]; review CMMR letters received today and confer with assistant and C. Thomas regarding same; [REDACTED]; forward email from claimant regarding jet to T. Wells to handle; review email from prior counsel to Receivership Entities regarding request from attorney for seller of land that apparently did not close, to release funds held in escrow and respond to all requesting additional information; meet and confer with C. Thomas regarding [REDACTED]; listen to voicemails from attorney for S. Bedoya and from vendor to whom we sent letter, forwarding message from latter to T. Wells to handle; confer with S. Latham regarding [REDACTED]; meet with two Chinese investors who appeared unannounced; confer with C. Thomas regarding same; return call from plaintiff in Collin County lawsuit regarding pretrial conference set for tomorrow; email contact information for two investors to SEC and US</p>	8.70	\$385.00	\$3,349.50
------------	-----	--	------	----------	------------

		attorney; return call from counsel to S. Bedoya regarding company cars and related issues; review email from attorney who represents lender on airplane and forward to T. Wells to respond.			
11/02/2022	SRL	Review cases pending involving Barton entities; review Notice of Stay filed in pending Barton entities cases; prepare Notice of Stay for various pending cases involving Barton entities.	3.90	\$110.00	\$429.00
11/02/2022	TBW	Call with J. Dillion regarding unpaid work at 4107 Rock Creek; emails to M. Gill regarding insurance questions for Amerigold; email to Alamo Title to follow-up on request for information; emails and calls with J. Simon regarding Vista bank accounts; call with J. Silvasan regarding Amerigold; email to B. Armstrong regarding Amerigold insurance; meeting with C. Thomas regarding [REDACTED]; review deed for 3926 Vista Woods; call with Bank of America regarding accounts; email to M. McGee regarding Louisiana National Bank; call and follow-up email with E. Moeller regarding representation of Bank of America; revise letter to Providence Title; revise TXU letter; call with M. Matthews regarding invoice sent to JMJ; other miscellaneous correspondence and meetings regarding receivership. [Time reduced from 9.8 hours]	5.90	\$200.00	\$1,180.00
11/03/2022	CCK	Email exchanges with accountant regarding correct form to file with the IRS for each entity; review correspondence from tax counsel for recent purchaser of Receivership Entity providing contact info to litigation counsel; [REDACTED]; email exchange with C. Thomas regarding [REDACTED]; confer with T. Wells regarding [REDACTED]; [REDACTED]; email exchange with V. McMurry regarding scheduling meeting; further email to counsel for Wall and Barton conferring about motion to establish admin procedures; review and revise letters to Barclays and AAdvantage; continued review of information received from former counsel for Receivership Entities in multiple lawsuits; email B. Henry	6.80	\$385.00	\$2,618.00

regarding receipt of same; review email from counsel for S. Bedoya confirming verbal information received regarding her possession of an Audi; confer with assistant regarding [REDACTED]; review and revise letter to Greystone, HUD lender on several properties; review Barton's notice of intent to file response regarding government's motion to stay and confer with C. Thomas regarding same; [REDACTED]; confer with C. Thomas regarding [REDACTED]; revise letter to counsel for lender on Turtle Creek property; review email from Roper regarding conference on motion for admin procedures and respond to same from M. Edney; call with attorney for buyer on Ridgeview addition lots (Venus) set to close in a few days regarding same, and numerous issues related to same; email C. Thomas regarding same; revise motion for admin procedures to request expedited consideration and details regarding conference.

11/03/2022	SRL	Review TXU and Dallas Water Utilities bills for Goldmark Hospitality/Amerigold Suites and prepare chart of same.	1.10	\$110.00	\$121.00
11/03/2022	TBW	Email to J. Dillion regarding 4107 Rock Creek invoice; add property details to running property spreadsheet; call with J. Silvasan regarding Amerigold; research Overlook at Allenville; review BM318 materials sent from Forshey Prostok; email to S. Frossard regarding Providence Title; call with B. Forshey regarding BM318; revise Barton EIN list; call and follow-up email with J. Lesser regarding Bank of America; emails to J. Medley regarding Third Coast Bank; call with G. Brewer regarding Alamo Title; email to K. Fonville; numerous emails to C. Koonce and C. Thomas [REDACTED]. [Time reduced from 10.1 hours]	6.20	\$200.00	\$1,240.00
11/04/2022	TBW	Review response from Louisiana National Bank; begin drafting reply to same; research on LA statutes listed in letter; calls with J. Simon; locate amounts due for Amerigold Spectrum and DWU bills and pay; emails to J. Krueger and J. Richards regarding address changes for DWU bills; call and email to R. Pinson regarding hearing scheduled in JMJ v. Tamoni matter; call with J. Silvasan	5.10	\$200.00	\$1,020.00

		regarding paycheck and Amerigold management; other miscellaneous correspondence and meetings regarding receivership. [Time reduced from 8.2 hours]			
11/07/2022	CCK	<p>Review C. Thomas comments [REDACTED]; send email to M. Edney and R. Roper; review email from counsel for S. Bedoya regarding past due bill for navigator and email exchanges regarding same; confer with T. Wells regarding [REDACTED]; confer with C. Thomas regarding [REDACTED]; review email received from Capital One and forward same to assistant to pull down documents; review and revise letter to Quickbooks; draft email responding to US Trustee's notice regarding motion to dismiss and setting for same; confer with T. Wells regarding [REDACTED]; call with Chase; email C. Thomas and T. Wells regarding same; review voicemail from lender and forward same to T. Wells; review email from interested purchaser and forward same to C. Thomas; review email from investor; email V. McMurry regarding whether he is appearing at meeting tomorrow; review and revise letter to investors; communicate with C. Thomas regarding [REDACTED]; review investor information form and revise same.</p>	1.80	\$385.00	\$693.00
11/07/2022	TBW	Update chart of Amerigold's past due bills; email to counsel for Tamoni LLC requesting they pass hearing and subsequent responses; revise letter to send to Commonwealth Title; research Johnson and Ellis County appraisal districts for additional Barton controlled properties; emails to B. Forshey and D. Perry setting meeting; call with J. Richards regarding address changes for DWU bills; email to B. Armstrong regarding insurance loss runs; call and follow-up email with L. Arey regarding Capital One; email to M. Gill regarding insurance; call and follow-up email with R. Chappel regarding personal injury lawsuit at Amerigold; calls and emails with G. Evans regarding Elite Jet; numerous emails to C. Koonce and C. Thomas [REDACTED]. [Time reduced from 10.1 hours]	6.10	\$200.00	\$1,220.00
11/08/2022	SRL	Review active litigation cases and obtain original	1.90	\$110.00	\$209.00

petitions for same to assist in preparations of litigation summary for Court.

11/08/2022	CCK	<p>Review and respond to emails from prospective purchaser requesting return of escrowed funds, email from counsel requesting NDA, emails from C. Thomas [REDACTED]; confer with C. Thomas regarding [REDACTED]; review summary regarding litigation prepared by V. McMurry in advance of meeting; meet with V. McMurry regarding status/strategy/potential resolution for pending litigation and Lincoln Navigator in his possession (2 hours); email counsel for S. Bedoya regarding payoff/note information on the Lincoln; forward secure content emails rec'd from Chase to assistant; respond to email inquiry from Texas Brand Bank regarding Goldmark property; confer with T. Wells regarding [REDACTED]; respond to inquiry from lender on FHC Acquisition property regarding whether property is under contract; forward 3 messages to T. Wells to return; lengthy meeting with team to discuss [REDACTED].</p>	4.90	\$385.00	\$1,886.50
11/08/2022	TBW	<p>Review documents related to personal injury litigation involving Amerigold; review litigation summaries regarding active cases involving JMJ Development and other receivership entities; research existence of Capital One accounts; meeting with V. McMurray regarding on litigation involving JMJ Development and other receivership entities; call with J. Silvasan regarding repairs needed at Amerigold; meeting with C. Thomas and C. Koonce to discuss [REDACTED]; other miscellaneous correspondence and meetings regarding receivership. [Time reduced from 9.2 hours]</p>	5.50	\$200.00	\$1,100.00
11/09/2022	CCK	<p>Email exchanges with C. Thomas regarding [REDACTED]; review and respond to emails from counsel for Regions Bank, lender on Frisco property, and forward Dropbox link to documents produced by Regions to assistant; respond to inquiry from prospective purchaser requesting return of escrow funds regarding status of involved</p>	6.70	\$385.00	\$2,579.50

entities; review email from developer with PSA regarding Ridgeview properties, approvals needed for deal to close, and requested extension to closing; call with Texas Brand Bank to discuss accruing interest on notes secured by CDs, status of Goldmark on which bank holds a lien, request additional information related to same and confer with C. Thomas regarding [REDACTED]; review correspondence with title company involved in TC Hall deal and confer with T. Wells regarding [REDACTED]; confer with T. Wells regarding [REDACTED]; confer with assistant regarding [REDACTED]; revise letter to insurer for Rock Creek; email updated EIN/entity list to Wells Fargo; return call from levies department at Chase regarding frozen/balance of funds, requesting escalation of same; brief review of information and documents received from First Insurance Funding; forward call from attorney adverse to JMJ to T. Wells to return; [REDACTED]; review and revise lis pendens and confer with C. Thomas regarding [REDACTED]; email S. Latham regarding [REDACTED].

11/09/2022	SRL	Begin review of state and federal cases involving JMJ Development.	0.80	\$110.00	\$88.00
11/09/2022	TBW	Review documents for Chubb insurance policy; emails to D. Walton regarding Capital One accounts; emails to D. Perry and B. Forshey regarding BM318 LLC; call with D. Bynum regarding J. Dowdall loan and payments; emails to K. Taylor regarding Wall007 bankruptcy; calls and emails with G. Brewer regarding Commonwealth Title, Fidelity National, and Alamo Title documents; review Commonwealth Title document production; call with J. Gitlin regarding Dennison Katy Trail; email to J. Simon and J. Taylor regarding online access to Vista accounts; call and follow up emails with E. Shavin regarding Ramolia	5.80	\$200.00	\$1,160.00

		cases; email to J. Medley regarding Third Coast Bank loan; other miscellaneous correspondence and meetings regarding receivership. [Time reduced from 9.6 hours]			
11/10/2022	SRL	Continue review of state court cases and federal court cases involving JMJ Development to confirm filing of Notice of Stay in same.	1.10	\$110.00	\$121.00
11/10/2022	TBW	Call with MJ bobcat regarding past due invoices on Ridgeview Addition; call with B. Owens/Circle H regarding past due invoices for utility work at Ridgeview Addition; call with Chase Bank regarding frozen accounts; emails to M. Cooper regarding frozen Chase Bank accounts; call and emails with D. Graham regarding frozen Chase Bank accounts; draft letter to Chase Bank requesting select accounts be unfrozen; call with H. Garcia regarding Chase Bank document production and frozen accounts; call with P. Wilson regarding Sunchase management; call with Home Depot regarding past due account; conference call with B. Forshey, D. Perry, E. Chou, and C. Koonce regarding BM318 LLC; revise creditor letter to Home Depot; revise creditor letters to Tesla, Porsche, and Audi; call with J. Silvasan regarding Amerigold; call with TXU to pay Amerigold power bill; other miscellaneous correspondence and meetings regarding receivership. [Time reduced from 10.2 hours]	6.10	\$200.00	\$1,220.00
11/11/2022	TBW	Begin chart summarizing active litigation cases for report to court; email to D. Graham and P. Wilson regarding rentable items and concessions report; call and follow up emails with Air Texas regarding past due bills at Amerigold Suites; call with Atmos Energy regarding receivership entity accounts; call with First Insurance Funding regarding payments for premium loans; email to I. Mooney regarding receivership order and previous letter to First Insurance Funding; other miscellaneous correspondence and meetings regarding receivership. [Time reduced from 7.9 hours]	5.50	\$200.00	\$1,100.00
11/14/2022	CCK	Review deadlines for Defendants' responses to two pending motions; review emails between Veracity Forensic and Defendants' IT professional, requesting further assistance; review email from M. Edney regarding mail and sales issues, and C. Thomas [REDACTED]; draft response; review offer to purchase various furnishing in Rock	2.30	\$385.00	\$885.50

Creek location and confer with C. Thomas regarding same; confer with C. Thomas regarding [REDACTED]; forward voicemail to T. Wells to return (from secured creditor); confer with T. Wells regarding [REDACTED]; draft email to counsel who previously represented Wall Entities in Bankruptcy to confirm the reasons those were filed and gather more information for C. Thomas to [REDACTED].

11/14/2022	TBW	Finish chart summarizing active litigation cases for report to court; call with J. Moon regarding Venus properties; call with E. Moeller regarding Bank of America accounts; call with C. Thomas with updates; call with I. Mooney regarding First Insurance Funding payments; call with J. Silvasan regarding issues with Amerigold and payments for repairs; emails to S. Latham regarding Chase Bank accounts; email to J. Simon regarding Goldmark account; numerous emails to C. Koonce and C. Thomas; emails to M. Gill regarding insurance for Amerigold Suites; [REDACTED]; other miscellaneous correspondence and meetings regarding receivership. [Time reduced from 9.1 hours]	6.30	\$200.00	\$1,260.00
11/15/2022	CCK	Confer with T. Wells regarding [REDACTED]; begin review of response to (1) admin motion; (2) government's motion to stay (3) motion to supplement Receivership Order, including reviewing authorities submitted in support; confer with C. Thomas regarding [REDACTED]; forward message from Frisco City Attorney regarding outstanding issues on Frisco development property to C. Thomas; review email from V. McMurry and attachments regarding payments made on Lincoln Navigator and forward same to C. Thomas for [REDACTED]; call Intuit counsel (again) requesting access assistance; follow-up with J. Kane regarding requested documents and information; follow up with Veracity to determine with Receivership Entity's IT person ever responded; review title commitment on Rock Creek Property and confer with C. Thomas regarding [REDACTED].	4.70	\$385.00	\$1,809.50

[REDACTED]; review bank records revealing Barton's disregard for corporate entities and irregular transfers; call with Ford Finance regarding 2017 Navigator; email counsel for S. Bedoya regarding individual who received substantial and recent payments from Broadview account; review and respond to email from Kane regarding documents requested from lien holder in 2999 TC; review and respond to email from counsel for Texas Brand Bank, producing additional documents related to the lien and loans related to Goldmark property and requesting additional information regarding same and the basis for CDs securing same; confer with C. Thomas regarding [REDACTED]; [REDACTED]; review wire transfer information received from DLP evidencing transfers made to Barton entities and confer with C. Thomas regarding same.

11/15/2022	TBW	Briefly review new filings regarding M. Barton entities response to motion to supplement order appointing receiver, T. Barton response to motion to supplement the order appointing receiver, and T. Barton's response to USA's motion to intervene and stay; call with T. Nguyen regarding Venus property lender; add CAD numbers to property chart; call and follow up email with C. Schwartz regarding development money; call with J. Silvasan regarding Amerigold; call with R. Chappell regarding Amerigold injury suit; emails to M. Gill regarding insurance to Amerigold; call to Terminix regarding Amerigold bill; call with A. Marx setting up time to get items from Turtle Creek; call with J. Morelli setting up time to get items from Turtle Creek; email to M. Cast regarding TXU bills, email to A. Pamenari setting up time to get items from Turtle Creek; email to D. Rollins regarding account statements; other miscellaneous correspondence and meetings regarding receivership. [Time reduced from 9.4 hours]	6.10	\$200.00	\$1,220.00
11/16/2022	CCK	Review emails regarding bank records and tracking additional records and need to clear judgment abstract before selling Rock Creek property; return call from attorney representing Intuit; review last few days' mail (extensive) and [REDACTED]; [REDACTED]; email accountant regarding [REDACTED]; [REDACTED]; confer with team regarding [REDACTED]; call with [REDACTED]	6.10	\$385.00	\$2,348.50

counsel regarding pending motions and response to same; review rules regarding interlocutory appeals re potential appeal of receivership order; telephone conference with counsel for Intuit and draft email providing Order and all relevant information regarding Quickbooks account and request for pw/access information; research regarding [REDACTED]; [REDACTED]; revise letters to vendors/creditors; revise letters to certain creditors or vendors; review account history documents received from First Financial and email contact producing same with follow-up question; email C. Thomas providing [REDACTED]; [REDACTED]; review multiple emails and documents received from counsel for lender on 2999TC property and respond regarding same; call with M. Ahuja regarding [REDACTED]; [REDACTED]; email C. Thomas regarding [REDACTED]; [REDACTED]; review correspondence with title company handling closing on certain Venus properties; review multiple orders regarding various pending motions; review letter from M. Edney demanding that we cease contacting R. Heller at CKC consulting; draft response to same demanding access credentials to all electronic storage devices and locations; brief review of lawsuit filed at the end of October and confer with T. Wells regarding [REDACTED].

11/16/2022	TBW	Emails to J. Simon regarding Vista Bank accounts; call and emails with J. Taylor regarding opening new receivership bank account; emails and call with Air Texas regarding Amerigold bills; call with R. Murphy regarding First insurance Funding; review documents from First Funding Insurance; call with J. Gitlin regarding Ronrush and JMR100 deal; email to G. Brewer regarding closing documents from Fidelity National Title; call with J. Silvasan regarding Amerigold bills; email to D. Walton regarding Capital One accounts; review supplemental order to the receivership order; call and follow up emails with A. Capps regarding Circle H lawsuit against La Jolla Construction management and Ridgeview Addition; review Circle H filings; other miscellaneous correspondence and meetings regarding	4.90	\$200.00	\$980.00
------------	-----	---	------	----------	----------

receivership. [Time reduced from 8.1 hours]

11/17/2022	TBW	Join call for draw meeting for Parc at Opelika (meeting did not occur as scheduled); call with T. Nguyen regarding updates on documents for Venus properties; review bank statements from Vista bank; [REDACTED]; call with Chase Bank regarding document productions; call with G. Brewer regarding closing documents from Fidelity National; emails to A. Capps regarding Circle H lien; review Broadview Holdings bank statements; revise creditor letter to send to potential creditors; review closing documents from Ronrush investments; other miscellaneous correspondence and meetings regarding receivership. [Time reduced from 8.6 hours]	5.90	\$200.00	\$1,180.00
11/18/2022	TBW	Participate in call with D. Rollins, L. Pedigo, and C. Koonce regarding Texas Brand Bank; emails and call with M. Cast regarding past due charges on TXU accounts and changing accounts to Receiver's name; call with C. Thomas and C. Koonce regarding TXU; call with TXU attempting to change account name to Receiver's name; emails to M. Gill regarding insurance; email to J. Price; revise letter to send to Merrill Lynch; other miscellaneous correspondence and meetings regarding receivership. [Time reduced from 5.7 hours]	4.00	\$200.00	\$800.00
11/23/2022	TBW	Call with J. Silvasan regarding payroll and insurance questions at Amerigold; organize and review non-privileged documents located at 2999 Turtle Creek on 11/22; call with T. Jones regarding Lost Creek Golf Club and lawsuit associated with it; emails to M. Gill and C. Thomas regarding new insurance for Amerigold; email to J. Simon regarding payment from Amerigold; begin reviewing requirements for motions to sell real property; other miscellaneous correspondence and meetings regarding receivership. [Time reduced from 4.3 hours]	3.40	\$200.00	\$680.00
11/27/2022	CCK	Continue drafting Response ISO motion to Supplement, responding to M. Barton objections; review HGNH motion to intervene.	4.50	\$385.00	\$1,732.50
11/28/2022	CCK	Review C. Thomas emails about [REDACTED]; multiple emails and [REDACTED]	11.60	\$385.00	\$4,466.00

		communications with T. Wells, S. Latham and assistant about [REDACTED]; continue drafting Reply to Max Barton objection; confer with C. Thomas regarding [REDACTED]; confer with C. Thomas regarding [REDACTED]; confer with M. Buller regarding [REDACTED].			
11/29/2022	CCK	Brief review of motion to stay filed by Barton; continue drafting Response to M. Barton objection, reviewing and sorting extensive evidence (extensive); confer with C. Thomas regarding [REDACTED]; review email from attorney regarding purported basis for large payments sent to him although he is adverse to receivership entities; confer with all parties regarding inclusion of additional entities in the motion to supplement; call with R. Roper regarding contempt issues and review subsequent email regarding art; call from M. Quilling as counsel for Pillar; confer with T. Wells regarding [REDACTED]; call with C. Thomas regarding [REDACTED]; review letter from M. Edney regarding IT access and privilege issues and respond to same; confer with C. Thomas regarding [REDACTED].	13.00	\$385.00	\$5,005.00
11/29/2022	MMB	Conference with C. Koonce regarding [REDACTED]; Review and analyze relevant portions of Receivership Order; Begin drafting Motion for Show Cause. [No charge]	1.80	\$0.00	\$0.00
11/30/2022	CCK	Confer with C. Thomas regarding [REDACTED]; email US Trustee regarding continuation of hearing on motion to dismiss Wall Bankruptcies; review funding agreement located by C Thomas for use in Response; continue reviewing, sorting and organizing exhibits and conforming C. Thomas	12.70	\$385.00	\$4,889.50

Declaration regarding same; review and respond to email from Ford Motor Credit regarding S. Bedoya payoff on Lincoln; confer with C. Thomas regarding [REDACTED]; respond to email from attorney for Intuit and review email from accountant regarding status of efforts to obtain access; call with S. Bedoya's attorney regarding access to safe deposit box and fire safe; continue drafting Response, supporting declaration and conforming all to the evidence (extensive); email counsel for HNGH regarding copies of wire transfer documents requested several weeks ago; brief review of "inventory" provided by Barton of art at TC Hall location.

12/01/2022	TBW	Respond to emails from K. Fonville regarding meeting to discuss JMJ v. Tamamoi stay; respond to emails from J. Dillion regarding Rock Creek sale; email and response to M. Gill regarding liability insurance at Amerigold; call with J. Gitlin regarding escrow money between Titan Investments and First Development Co. of Ohio; email to C. Koonce and C. Thomas regarding [REDACTED]; respond to email from R. Ortega regarding Air Texas invoices at Amerigold; revise letter to American Express; call with TXU regarding electric service at 4107 Rock Creek; draft language for meet and confer for Rock Creek motion; call and follow up email with D. George regarding FCI payoff on Rock Creek property; email to D. Cromwell regarding Louisiana Bank; call with first Insurance Funding to pay insurance loan for 4107 Rock Creek; other miscellaneous correspondence and meetings regarding receivership. [Time reduced from 8.2 hours]	4.90	\$200.00	\$980.00
12/02/2022	SRL	Prepare exhibits for filing with Receiver's Motion for Appointment of Appraiser; revise Appendix for same; prepare two Partial Release of Liens for Abstract of Judgments; prepare creditor letters to Premier Systems, Target and FedEx transmitting Order Appointing Receiver; finalize and file Receiver's Motion for Appointment of Appraisers, Approval of Appraisals, and Setting Hearing Regarding Approval of Sale with Appendix and proposed order; prepare termination notice to L. Mahan at Douglas Elliman Real Estate regarding listing contract executed by T. Barton on 4107 Rock Creek property; draft letter to J. Walker at Miller Mentzer Walker, P.C. regarding 8.6-acre	4.90	\$110.00	\$539.00

tract in Ennis, Texas.

12/02/2022	TBW	Meeting with C. Thomas regarding [REDACTED]; review and respond to email from K. Fonville; prepare for and have call with K. Fonville regarding JMJ v. Tamamoi dispute and lis pendens on E. Illinois property; call with J. Simon regarding Vista bank questions; review Barton's Motion to stay Pending Appeal in preparation for response; begin drafting Response to Motion to Stay; other miscellaneous correspondence and meetings regarding receivership. [Time reduced from 8.3 hours]	5.80	\$200.00	\$1,160.00
12/05/2022	SRL	Prepare draft Receiver's Notice of Intended Sale of Personal Property.	0.60	\$110.00	\$66.00
12/07/2022	SRL	Review IRS documents recovered from 2999 Turtle Creek and prepare same for further review by forensic accountants.	2.90	\$110.00	\$319.00
12/08/2022	SRL	Continue review of IRS documents on Barton entities; review case dockets for Orders Establishing Administrative Procedures; email to United Healthcare regarding account information.	5.50	\$110.00	\$605.00
12/08/2022	CCK	Call with auction house regarding proposed changes to contract; confer with T Wells regarding [REDACTED]; brief review of M. Barton reply ISO objection to supplemental entities; confer with C. Thomas regarding [REDACTED]; return emails from attorney who previously represented 2999 TC; call with SEC regarding motion to stay issues; confer with C. Thomas regarding [REDACTED]; review same; research ISO [REDACTED]; return call from Elliot Shavin; return email from Barton email account regarding health insurance cancellation;	8.70	\$385.00	\$3,349.50
12/09/2022	CCK	Review and edit Response to Motion to Stay as revised by C Thomas, and further research ISO same; review motion to ratify DLP settlement; review C. Thomas email to attorneys who filed lawsuit on behalf of Max Barton/Titan and confer with Mr. Thomas regarding same; review revised letter from TX Brand Bank regarding their intent to sell Note; execute same and email exchange with	4.70	\$385.00	\$1,809.50

their counsel; revise Notice re Publication of Rock Creek Sale; respond to status inquiry from Intuit counsel; email R. Marx, requesting again, closing binders, etc. re various properties, including TC Hall and Villita; review additional information (bank records) regarding payments made by entities on Porsche in Victoria's possession and name and confer with team regarding [REDACTED]; continued review of proposed priv protocol and draft response to same; lengthy call with counsel for Romalia judgment creditors regarding the receivership and request for release of lien as to Rock Creek Property; call with C. Thomas to discuss same; further review and edits to Response to Motion to Stay; respond to emails from 2 creditors; review email from T. Wells regarding [REDACTED]; email M. Ahuja regarding [REDACTED]; review and revise Notice of Sale regarding contents of Rock Creek Property and confer with T. Wells regarding same; begin review of Barton depo transcript from prior litigation; review SEC's response to Motion to Stay

12/09/2022	SRL	Review document files for IRS Form SS-4's; email to M. Ajuha regarding same.	2.40	\$110.00	\$264.00
12/12/2022	SRL	Receive and review information from United Healthcare on Barton insurance policies; correspondence with J. Ronning regarding same.	0.60	\$110.00	\$66.00
12/12/2022	TBW	Email to C. Davis regarding NTTA bill received addressed to his client; meeting with C. Koonce and C. Thomas to discuss [REDACTED]; emails to K. Fonville regarding E. Illinois property; review summary judgment motion filed in JMJ v. Tamamoi; email to counsel for M. Barton regarding billing statement; pay Amerigold spectrum bill; draft proposed order granting Receiver's Sale of Personal Property; review SEC's Response to Barton's Motion to Stay; review Venus documents sent by T. Nguyen; begin filling out Amerigold information for brokers; review Venus property tax statements; other miscellaneous correspondence and meetings regarding receivership. [Time reduced from 7.8 hours]	5.90	\$200.00	\$1,180.00
12/13/2022	CCK	Call with C. Thomas to discuss [REDACTED]	6.30	\$385.00	\$2,425.50

[REDACTED];
 review and respond to multiple emails regarding auction contract, revisions to Lumar Land transaction, and motion to ratify DLP agreement; continue drafting Response to HGNH's motion to intervene, including research regarding same; review documents rec'd from R. Marx and forward same to C. Thomas; request recorded plat for same transaction from the title company; follow up with all counsel regarding conference on Notice of Sale regarding Rock Creek contents; confer with T. Wells regarding [REDACTED];
 [REDACTED]; review order granting supplemental motion and confer with C. Thomas regarding [REDACTED];
 forward order to Max Barton counsel in new Titan lawsuit and confer with S. Latham regarding [REDACTED]; confer with Title Company regarding Order and request for transfer of escrowed funds to Receivership Estate; revise Notice of Sale to reflect conference and revise related order; confer with C. Thomas regarding [REDACTED]; confer with C. Thomas regarding [REDACTED];
 [REDACTED]; review and revise notice of stay for new Titan lawsuit

12/13/2022	SRL	Prepare, finalize, and file Notice of Stay for Cause No. 109975, Titan Investments, LLC v. TBW Land & Cattle, LLC and Byron Walker.	0.80	\$110.00	\$88.00
12/13/2022	TBW	Emails to D. George following up on FCI payoff for Rock Creek property; participate in call with brokers for Amerigold Suites; search files for documents related to Ridgeview Addition in preparation for call; participate in call with C. Thomas and J. Moon regarding status of Ridgeview Addition sale; review redline edits to Lumar Land agreement and release; review documents sent by M. Milford regarding past due invoices and email response; call with J. Silvasan regarding Amerigold Suites; call with E. Elliott regarding Regus receivership letter; review Order Granting Receiver's Motion to Supplement Order; email to B. Forshey with edits to Lumar Land agreement and release; email to D. Cromwell with supplemental order and highlighting TC Hall is a confirmed Receivership Entity; email to D. Rollins	5.70	\$200.00	\$1,140.00

regarding Amerigold appraisal; other miscellaneous correspondence and meetings regarding receivership. [Time reduced from 8.2 hours]

12/14/2022	CCK	Brief review of recent mail; confer with all parties regarding confirmation of DLP agreement; review Barton's response to Motion to Appoint Appraisers (sell Rock Creek Property); extensive research ISO same; email exchange with Intuit counsel regarding continuing effort to obtain access to QB; confer with C. Thomas regarding strategy and arguments for reply ISO motion to sell and draft same	8.70	\$385.00	\$3,349.50
12/14/2022	TBW	Research [REDACTED]; draft memo email to C. Koonce [REDACTED]; emails and call with M. Gil regarding insurance for 3600 Gillespie; review mail sent to receivership entities; emails to E. Chou regarding meeting for Lumar Land agreement; begin revising Motion to Appoint Appraisers for Frisco property; call with TXU to pay past due bill for Gillespie Villas; call to First Insurance Funding regarding lapsed insurance for 3600 Gillespie; other miscellaneous correspondence and meetings regarding receivership. [Time reduced from 7.5 hours]	5.20	\$200.00	\$1,040.00
12/15/2022	CCK	Confer with C. Thomas regarding [REDACTED]; revise/edit same; confer with C. Thomas and T. Wells regarding [REDACTED]; research ISO same; draft email to lender's counsel; review response and confer with C. Thomas regarding same, drafting further reply; continued edits to Response to HNGH's motion to intervene/confirm ownership; [REDACTED]; review engagement agreements for accounting firm's review and certification of HUD loans; review correspondence from K Walji regarding pending cases and his flat fee agreement; confer with C. Thomas regarding [REDACTED]; [REDACTED]; brief research regarding [REDACTED]; Telephone conference with SEC regarding expectation of	6.10	\$385.00	\$2,348.50

		emergency motion to stay; confer with assistant regarding preparation for hearing on Monday			
12/15/2022	TBW	Review and respond to email from J. Silvasan regarding past due Amerigold Home Depot bills; email J. Sowska regarding past due Amerigold Home Depot bills; review FCI payoff demand and statements for 4107 Rock Creek; write check for J. Silvasan and scan in to records; respond to email from L. Adkins regarding Amerigold Home Depot bills; calls with First Insurance funding to reinstate insurance on 3600 Gillespie; calls with A. Marx, J. Morrelli, B. Rowlett, and M. Barton to schedule time to retrieve items from 2999 Turtle Creek; call with K. Seabolt regarding documents from Capital Title; call to Tesla attempting to find information about JMJ lease of car; continue revising Motion Appointing Appraisers for Frisco property; other miscellaneous correspondence and meetings regarding receivership. [Time reduced from 7.7 hours]	5.90	\$200.00	\$1,180.00
12/19/2022	TBW	Finalize motion to appoint appraisers and approve appraisals for Frisco property; revise draft of proposed order granting motion for same; call Terminix regarding Amerigold bills; call with J. Silvasan regarding HVAC issues a Amerigold; [REDACTED]; review mail from Midway postal box; send email to C. Koonce and C. Thomas [REDACTED]; email to M. Taylor and D. Rollins regarding Amerigold appraisal; send email to K. O'Rourke with paycheck amounts for Amerigold; other miscellaneous correspondence and meetings regarding receivership. [Time reduced from 8.6 hours]	6.10	\$200.00	\$1,220.00
12/21/2022	TBW	[REDACTED] review and revise BM318 and Lumar Land Agreement and Release; email to B. Forshey sending revisions for same; call with Republic Services regarding Amerigold Trash bill; call with Wells Fargo regarding letter received; draft letter to USI Insurance regarding past due invoice for Mansions at Marine Creek; call and follow up emails with Simplex regarding copiers at 2999	6.20	\$200.00	\$1,240.00

		Turtle Creek; other miscellaneous correspondence and meetings regarding receivership. [Time reduced from 7.8 hours]			
12/22/2022	TBW	Call and emails to Wells Fargo regarding existence regarding potential receivership entity bank accounts; locate and email Goldmark information requested from Walker Dunlop; call with J. Silvasan regarding Amerigold suites; call with Republic Services to pay trash bill for Amerigold Suites; [REDACTED]; call with T. Scott regarding Movestar quote; calls with T. Jones, G. Knox, and C. Thomas regarding Lost Creek Golf Course; other miscellaneous correspondence and meetings regarding receivership. [Time reduced from 4.4 hours]	3.10	\$200.00	\$620.00
12/23/2022	TBW	Review prior emails from G. Werley and draft update email to C. Thomas and C. Koonce regarding [REDACTED].	0.30	\$200.00	\$60.00
12/27/2022	CCK	Review email from attorney for Rice LLC and confer with C. Thomas regarding [REDACTED]; email with DLP counsel regarding status of ratification motion and appeal regarding same; confer with team regarding [REDACTED]; continue work on Motion to Show Cause	0.40	\$385.00	\$154.00
12/27/2022	TBW	Review and organize emails from Christmas holiday; respond to R. Manke email regarding Waste Management bill owed by 2999 TC Acquisitions; communications with J. Silvasan regarding Amerigold Suites issues and bills; review TXU invoices for Receivership Entities; review documents from G. Werley regarding Lost Creek golf course; other miscellaneous correspondence and meetings regarding receivership. [Time reduced from 4.6 hours]	2.90	\$200.00	\$580.00
12/28/2022	TBW	Review Barton's District Court Motion to Stay Order Pending Appeal; call with G. Werley regarding Lost creek golf course; draft email to C. Koonce and C. Thomas regarding same; draft letter to Banner Life Insurance; set up premium financing account and pay Goldmark Insurance payment; review final Lumar Land Agreement; review receivership mail; other miscellaneous correspondence and meetings regarding receivership. [Time reduced from 6.3 hours]	4.90	\$200.00	\$980.00

12/29/2022	TBW	Review Barton's Fifth Circuit Motion to Stay Pending Appeal; research [REDACTED]; draft email to C. Koonce regarding same; research [REDACTED]; draft email to C. Koonce regarding same; review HNGH Reply Brief; draft email to Impact Property Solutions regarding Amerigold bills; other miscellaneous correspondence and meetings regarding receivership. [Time reduced from 8.4 hours]	5.90	\$200.00	\$1,180.00
12/30/2022	CCK	Email with court reporter regarding timing on transcript; review index for Record and annotate same; continue drafting Response to Motion to Stay filed in the COA, conferring with T. Wells regarding [REDACTED]	7.40	\$385.00	\$2,849.00
12/30/2022	TBW	Film inventory of items in 4107 Rock Creek; review Barton's response to SEC's Motion for Receiver to include in response motion; communications with M. Gill and C. Thomas regarding additional insurance payment for Amerigold; begin drafting Motion to Dismiss Appeal; research on [REDACTED]; call with Terminix regarding Amerigold bills; call with First Insurance Funding to pay Rock Creek insurance; other miscellaneous correspondence and meetings regarding receivership. [Time reduced from 5.9 hours]	5.90	\$200.00	\$1,180.00
12/31/2022	CCK	Review transcript of hearing rec'd from court reporter; continue drafting response to appellate motion to stay	2.70	\$385.00	\$1,039.50

Quantity Subtotal 408.1

Subtotal \$111,618.50

Sale of Frisco Property

Date	Initials	Description	Hours	Rate	Client Total
11/22/2022	JJM	Phone call with C. Thomas regarding Purchase and Sale Agreement for Collin County land to Petra Development; begin review of Purchase and Sale	1.00	\$275.00	\$275.00

Agreement.

11/22/2022	ATF	Review Purchase Agreement from C. Thomas in preparation for a phone call with to discuss same; phone call with C. Thomas and J. Mahaffey regarding Purchase and Sale Agreement for Collin County land to Petra Development and next steps.	1.30	\$500.00	\$650.00
11/28/2022	JJM	Begin revisions to Purchase and Sale Agreement.	1.20	\$275.00	\$330.00
11/28/2022	ATF	Revise Purchase Agreement for a sale by receiver, focusing on conformance with the LOI, revisions to the representations and warranties, indemnification, disclaimers of warranties, limitations of liability, and other revisions.	5.00	\$500.00	\$2,500.00
11/29/2022	ATF	Finalize revisions to the Purchase Agreement and deliver to J. Mahaffey.	3.80	\$500.00	\$1,900.00
11/30/2022	JJM	Finalize revisions to Purchase and Sale Agreement and deliver to C. Thomas.	4.70	\$275.00	\$1,292.50
12/01/2022	JJM	Review and revise Purchase and Sale Agreement consistent with requested changes from C. Thomas.	0.70	\$275.00	\$192.50
12/02/2022	JJM	Phone call with C. Thomas regarding [REDACTED]; review and revise Purchase and Sale Agreement and deliver to C. Thomas.	0.80	\$275.00	\$220.00
				Quantity Subtotal	18.5
				Subtotal	\$7,360.00

Date	Initials	Description	Hours	Rate	Client Total
12/09/2022	JJM	Phone call with C. Thomas and A. Fox regarding [REDACTED]	0.60	\$275.00	\$165.00
12/21/2022	JJM	[REDACTED]	1.70	\$275.00	\$467.50
12/22/2022	JJM	[REDACTED]	6.80	\$275.00	\$1,870.00
12/23/2022	JJM	[REDACTED]	7.70	\$275.00	\$2,117.50

12/26/2022	JJM	[REDACTED]	2.20	\$275.00	\$605.00
12/26/2022	ATF	[REDACTED]	4.20	\$500.00	\$2,100.00
12/27/2022	JJM	[REDACTED]	0.80	\$275.00	\$220.00
12/27/2022	ATF	[REDACTED]	3.80	\$500.00	\$1,900.00
12/28/2022	JJM	[REDACTED]	0.90	\$275.00	\$247.50

Quantity Subtotal	28.7
Subtotal	\$9,692.50
Hours Total	796.6
Services Total	\$220,483.50
Expenses Total	\$0.00
Total	\$220,483.00

Current Statement payable upon receipt and due within 30 days.

Federal Tax ID 61-1764390

Wire Payments
 Veritex Community Bank
 17950 Preston Road, Suite 500
 Dallas, TX 75225
 ABA # 111024865 Account # 30081159

Check Payments
 Brown Fox PLLC
 8111 Preston Road, Suite 300
 Dallas, TX 75225

Credit Card Payments <https://secure.lawpay.com/pages/brown-fox-pllc/operating>

Direct payment inquiries to the Account Services Department at accounting@brownfoxlaw.com

Thank you for choosing Brown Fox. We appreciate your business.

EXHIBIT D

Invoice #8565
Created Date: 01/12/2023

Due: 01/26/2023

Total: \$4,120.00

Tax: \$0.00



Ahuja & Clark, PLLC
Certified Public Accountants
Tax & Accounting • Business Valuation • Business Interruption

469-467-4660

ddenison@ahujaclark.com

2901 N. Dallas Parkway Ste. 320 Plano, TX 75093

Invoice for Brown Fox Law

Attention: Charlene Koonce

Please contact Deborah Denison for any queries about this invoice.

Invoice Items

Services	Total
Services rendered during Q4 2022 regarding Barton Receivership ~ Accounting	\$4,120.00

Work Detail

Date: 11/28/2022

Date	Subject / Description	Owner	Hours	Rate	Amount
11/28/2022	Document Review Communicate with Intuit regarding access to JMJ books. Tried to access multiple times. Communicated with Intuit and tried access with their assistance.	Madhu A.	2h 0m	\$325.00	\$650.00

Date: 12/02/2022

Date	Subject / Description	Owner	Hours	Rate	Amount
12/02/2022	Document Review Access JMJ books, download general ledger, look for advances/companies identified by Ms. Koonce	Madhu A.	2h 0m	\$325.00	\$650.00

Date: 12/05/2022

Date	Subject / Description	Owner	Hours	Rate	Amount
12/05/2022	Document Review Research QuickBooks transactions for items identified by Receiver; discussion with Ms. Ahuja	Stacey H.	3h 0m	\$275.00	\$825.00

Date: 12/06/2022

Date	Subject / Description	Owner	Hours	Rate	Amount
12/06/2022	Document Review Review of QuickBooks and analysis of data requested	Stacey H.	2h 0m	\$275.00	\$550.00

APP000088

Date	Subject / Description	Owner	Hours	Rate	Amount
12/06/2022	Document Review	Madhu A.	2h 0m	\$325.00	\$650.00
	Analysis of requested data				

Date: 12/08/2022

Date	Subject / Description	Owner	Hours	Rate	Amount
12/08/2022	Project update	Stacey H.	30m	\$275.00	\$137.50
	Call with Mr. Thomas and Ms. Ahuja to discuss status of QuickBooks and requested information				
12/08/2022	Project update	Madhu A.	30m	\$325.00	\$162.50
	Call with Mr. Thomas and Ms. Huser to discuss status of QuickBooks and requested information				

Date: 12/12/2022

Date	Subject / Description	Owner	Hours	Rate	Amount
12/12/2022	Correspondence	Madhu A.	30m	\$275.00	\$137.50
	Response to Counsel regarding QuickBooks and request all QuickBooks copies				

Date: 12/20/2022

Date	Subject / Description	Owner	Hours	Rate	Amount
12/20/2022	Document Review	Stacey H.	18m	\$275.00	\$82.50
	Verifying whether access had been granted to various Receivership entity QuickBooks Online accounts per emails from Intuit. As of this data, none of the entities have been added to the Ahuja & Clark account.				

Date: 12/28/2022

Date	Subject / Description	Owner	Hours	Rate	Amount
12/28/2022	QuickBooks Access	Stacey H.	1h 0m	\$275.00	\$275.00
	Calls with Intuit regarding access to QuickBooks files				

Sub-total	\$4,120.00
Tax	\$0.00
Total	\$4,120.00

Please click on the link below to submit payment.



APP000089

EXHIBIT E

EXHIBIT E-1

Veracity Forensics LLC

5220 Spring Valley Rd Ste 220
 Dallas, TX 75254 US
 877-499-6878
 accounting@veracity-forensics.com



VERACITY FORENSICS LLC
 DIGITAL INVESTIGATION AND DISCOVERY EXPERTS

INVOICE

BILL TO
 Cortney C. Thomas, Receiver
 8111 Preston Rd., Suite 300
 Dallas, TX 75225

INVOICE 602
DATE 10/31/2022
TERMS Due on receipt
DUE DATE 10/31/2022

REFERENCE
 Confidntl: Barton Receivership

TX LICENSE
 A22974701

VF PROJECT
 20221019-D01-BTR

DESCRIPTION	QTY	RATE	AMOUNT
Analyst Time On-site inventory of various data source, website receivership notice, confirm network disconnect.	5.85	285.00	1,667.25T
Receiver Discount (12%)	1	-200.07	-200.07T

		SUBTOTAL	1,467.18
		TAX	121.04
		TOTAL	1,588.22

		BALANCE DUE	\$1,588.22

EXHIBIT E-2

Veracity Forensics LLC

5220 Spring Valley Rd Ste 220
 Dallas, TX 75254 US
 877-499-6878
 accounting@veracity-forensics.com



VERACITY FORENSICS LLC
 DIGITAL INVESTIGATION AND DISCOVERY EXPERTS

INVOICE

BILL TO
 Cortney C. Thomas, Receiver
 8111 Preston Rd., Suite 300
 Dallas, TX 75225

INVOICE 619
DATE 11/30/2022
TERMS Due on receipt
DUE DATE 11/30/2022

REFERENCE
 Barton Receivership

TX LICENSE
 A22974701

VF PROJECT
 20221019-D01-BTR

DESCRIPTION	QTY	RATE	AMOUNT
Analyst Time On-site visit with IT Consultant to confirm disabling of network access. Call with Quentin Lynn with TechPatrol (Barton former IT provider)	4.50	285.00	1,282.50T
Receiver Discount (12%)	-1	153.90	-153.90T

SUBTOTAL	1,128.60
TAX	93.11
TOTAL	1,221.71
<hr/>	
BALANCE DUE	\$1,221.71