#### 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,	<i>ॼॼॼॼॼॼॼॼॼॼॼॼॼॼॼॼॼॼॼॼॼॼॼॼॼॼॼॼॼॼॼॼॼॼॼॼॼ</i>	
D II CD C	§	
Relief Defendants.	8	

APPENDIX IN SUPPORT OF RECEIVER'S SECOND 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 January 1, 2023 through March 31, 2023	APP001-03
В	Receiver's invoice for services provided January 1, 2023 through March 31, 2023	APP004-35
С	Brown Fox invoice for services provided January 1, 2023 through March 31, 2023	APP036-93
D	Ahuja & Clark invoice from for services provided January 1, 2023 through March 31, 2023	APP094-102
Е	Veracity Forensic invoice from for services provided January 1, 2023 through March 31, 2023	APP103-106

## EXHIBIT A

## Case 3:22-cv-02118-X Document 258 to Precive 575 Page 5 of 109 Page 1 7601 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	
11 12	Disbursements for Receivership Operations:  10a Disbursements to Receiver or Other Professionals  10b Business Asset and Operating Expenses  10c Personal Asset Expenses  10d Investment Expenses  10e Third-Party Litigation Expenses  10f Tax Administrator Fees and Bonds  10g Federal and State Tax Expenses  Disbursements for Distribution Expenses Paid by the Fund  11a Distribution Plan Development Expenses  11b Distribution Plan Implementation Expenses  Disbursements to Court/Other  12a Court Registry Investment System (CRIS) or other banking fees related to the Fund.  12b Federal income taxes	110,594.98 94.98 -
13	Ending Balance (December 31, 2022)	\$ 856,537.35
14	Ending Balance of Fund - Net Assets  14a Cash & Cash Equivalents  856,53  14b Investments  14c Other Assets or Uncleared Funds	856,537.35 17.35
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	

## Case 3:22-cv-02118-X Document 258 ton Precives Page 6 of 109 PageID 7602 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 -02118-X Document 238parited 45/15/23 Page 8 of 109 PageID 7604

8111 Preston Road, Suite 300 Dallas, Texas 75225 Telephone: 214-327-5000 Fax: 214-327-5001

**INVOICE** 

Invoice # 34990 Date: 04/21/2023

#### Barton Receivership

#### SEC v. Barton - Case Administration

#### **Services**

Date	Initials	Description	Hours	Rate	Client Total
01/03/2023	CCT	Organize correspondence file. [No charge]	1.80	\$0.00	\$0.00
01/04/2023	ССТ	Continue organizing correspondence file. [No charge]	0.50	\$0.00	\$0.00
01/06/2023	CCT	Begin reviewing bills and drafting fee application for 4Q22. [No charge]	2.20	\$0.00	\$0.00
01/09/2023	CCT	Continue drafting fee application. [No charge]	0.20	\$0.00	\$0.00
01/11/2023	CCT	Continue drafting fee application. [No charge]	0.30	\$0.00	\$0.00
01/12/2023	CCT	Correspondence with accountants regarding pre-Receivership tax returns; cursory review of Barton's appellant's brief; correspondence with potential broker on Venus properties; review working draft of motion to show cause; revise same; correspondence with counsel regarding same; review revised GL quote on Amerigold and revised financing agreement for same; correspondence with lender on HUD apartments regarding outstanding loans.	3.30	\$385.00	\$1,270.50
01/13/2023	CCT	Meeting with property manager at Amerigold and drop-off payroll check. [No charge]	0.60	\$0.00	\$0.00
01/13/2023	ССТ	Correspondence with accountants regarding status of access to Quickbooks accounts; correspondence with counsel regarding potential intervention in interlocutory appeals.	0.40	\$385.00	\$154.00
01/15/2023	CCT	Organize correspondence file. [No charge]	0.90	\$0.00	\$0.00
01/17/2023	CCT	Review working draft of motion to compel or	1.80	\$385.00	\$693.00

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		alternative motion to show cause; revise same; meeting and correspondence with counsel regarding same; review Order denying Barton's Motion to Stay.			
01/19/2023	CCT	Continue drafting fee application. [No charge]	1.90	\$0.00	\$0.00
01/19/2023	ССТ	Review receivership mail; meeting with counsel to discuss needed action items from same; review working draft of Declaration in support of Motion to Compel; revise same; conference with counsel to discuss same.	1.70	\$385.00	\$654.50
01/19/2023	CCT	Travel to Amerigold to meet with property manager and deliver paychecks. [No charge]	0.60	\$0.00	\$0.00
01/20/2023	CCT	Continue drafting fee application. [No charge]	2.70	\$0.00	\$0.00
01/20/2023	CCT	Correspondence with IT advisor regarding plan for imaging digital devices at Turtle Creek; draft update for receivership website regarding motion to compel; correspondence with IT advisor regarding chat function on receivership website and needed changes to formatting of same; telephone conference with counsel regarding privilege protocol.	1.10	\$385.00	\$423.50
01/22/2023	CCT	Continue drafting fee application. [No charge]	1.10	\$0.00	\$0.00
01/23/2023	CCT	Organize correspondence file. [No charge]	1.10	\$0.00	\$0.00
01/26/2023	CCT	Continue drafting quarterly status report for 4Q22.	0.70	\$385.00	\$269.50
01/27/2023	CCT	Continue drafting status report for 4Q22.	0.60	\$385.00	\$231.00
01/28/2023	CCT	Continue drafting quarterly status report for 4Q22.	1.10	\$385.00	\$423.50
01/29/2023	CCT	Continue drafting quarterly status report for 4Q22.	1.60	\$385.00	\$616.00
01/31/2023	CCT	Finish drafting quarterly status report for 4Q22; draft update for Receivership website regarding same.	9.50	\$385.00	\$3,657.50
01/31/2023	ССТ	Meeting with Amerigold property manager regarding bi-weekly paychecks. [No charge]	0.50	\$0.00	\$0.00
01/31/2023	ССТ	Telephone conference with counsel, accountant, and S. Bedoya regarding access to HR Sterling and Quickbooks; telephone conference with counsel regarding same; correspondence with counsel regarding voicemail from SBA.	0.60	\$385.00	\$231.00

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## Case 3:22-cv-02118-X Document 238 Filed 05/15/23 Page 10 of 109 PageID 7606

02/01/2023	CCT	Organize correspondence file. [No charge]	0.60	\$0.00	\$0.00
02/02/2023	CCT	Correspondence with counsel regarding continued delays from Intuit.	0.20	\$385.00	\$77.00
02/03/2023	CCT	Telephone conference and correspondence with counsel regarding ; cursory review of Receivership Entities' mail.	0.60	\$385.00	\$231.00
02/05/2023	CCT	Organize correspondence file. [No charge]	0.40	\$0.00	\$0.00
02/05/2023	CCT	Review correspondence from Intuit regarding status of access to D4OP QuickBooks accounts; correspondence with counsel regarding same; correspondence with counsel regarding	0.20	\$385.00	\$77.00
02/07/2023	ССТ	Telephone conference and correspondence with counsel regarding ; correspondence with counsel regarding .	0.30	\$385.00	\$115.50
02/09/2023	ССТ	Correspondence with counsel regarding; cursory review of SEC's response to appeal of Receivership Order; review working draft of letter to V. Barton regarding identification of claimed personal effects; revise same; correspondence with counsel regarding same.	0.50	\$385.00	\$192.50
02/10/2023	ССТ	Lengthy meeting and telephone conference with counsel regarding multiple outstanding receivership matters. [No charge]	0.80	\$0.00	\$0.00
02/12/2023	CCT	Organize correspondence file. [No charge]	1.10	\$0.00	\$0.00
02/13/2023	CCT	Continue drafting fee application; coordinate redaction of privileged and other information from invoices. [No charge]	3.10	\$0.00	\$0.00
02/14/2023	CCT	Finish drafting fee application; finish coordinating redaction of privileged and other sensitive information from invoices. [No charge]	1.60	\$0.00	\$0.00
02/14/2023	CCT	Meeting with manager at Amerigold suites regarding payroll. [No charge]	0.60	\$0.00	\$0.00
02/27/2023	CCT	Organize correspondence file. [No charge]	1.60	\$0.00	\$0.00
03/08/2023	CCT	Meeting with property manager at Amerigold	0.60	\$0.00	\$0.00

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		regarding payroll and other items. [No charge]			
03/27/2023	CCT	Organize receivership correspondence file. [No charge]	1.10	\$0.00	\$0.00
03/27/2023	ССТ	Meeting with counsel to discuss status of receivership; cursory review of voluminous records produced by SEC for bank information to send accountants.	0.40	\$385.00	\$154.00
03/29/2023	CCT	Research location for previous Receivership Entities' tax accountant; review receivership order for purposes of potential meeting with accountant; prepare for same; travel to Receivership Entities' prior accountant's office; visit with office staff; visit with accountant over phone; correspondence with Receivership accountants regarding W-2s; correspondence with former employee regarding same.	2.60	\$385.00	\$1,001.00
03/31/2023	ССТ	Correspondence with former employees regarding W2s.	0.10	\$385.00	\$38.50

Quantity Subtotal

Services Subtotal \$10,510.50

53.2

### **Expenses**

Date	Description	Client Total
10/28/2022	Fee for postage and supplies from UPS Store for forwarding weekly mail.	\$14.60
11/07/2022	Fee for postage and supplies from UPS Store for forwarding weekly mail.	\$20.16
11/14/2022	Fee for postage and supplies from UPS Store for forwarding weekly mail.	\$20.16
11/18/2022	Fee for postage and supplies from UPS Store for forwarding weekly mail.	\$18.91
11/25/2022	Fee for postage and supplies from UPS Store for forwarding weekly mail.	\$19.60
12/02/2022	Fee for postage and supplies from UPS Store for forwarding weekly mail.	\$19.60
12/09/2022	Fee for postage and supplies from UPS Store for forwarding weekly mail.	\$19.60
12/16/2022	Fee for postage and supplies from UPS Store for forwarding weekly mail.	\$18.91
12/23/2022	Fee for postage and supplies from UPS Store for forwarding weekly mail.	\$20.15
12/30/2022	Fee for postage and supplies from UPS Store for forwarding weekly mail.	\$19.67

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01/04/2023	Transcript of hearing held on 12/19/22.	\$301.45
01/04/2023	Supplies for moving mattresses and bedding from Rock Creek.	\$10.81
01/04/2023	Labor charges for moving mattresses and bedding from Rock Creek.	\$163.77
01/06/2023	Secretary of State record searches 1Q23.	\$52.00
01/06/2023	Fee for postage and supplies from UPS Store for forwarding weekly mail.	\$20.42
01/13/2023	Fee for postage and supplies from UPS Store for forwarding weekly mail.	\$19.67
01/15/2023	Fee for pulling documents from Collin County (BGE, Inc. v. JMJ Development, LLC).	\$15.55
01/16/2023	Fee for pulling Answer in TRTX Properties, et al v. Ramolia.	\$1.35
01/17/2023	Fee for Dallas Morning News publication of Notice of Sale of Frisco Gate Property.	\$349.00
01/20/2023	Fee for postage and supplies from UPS Store for forwarding weekly mail.	\$20.96
01/27/2023	Fee for postage and supplies from UPS Store for forwarding weekly mail.	\$20.41
02/04/2023	Fee for postage and supplies from UPS Store for forwarding weekly mail.	\$14.67
02/07/2023	Fee for postage and supplies from UPS Store for forwarding weekly mail.	\$20.96
02/10/2023	Fee for postage and supplies from UPS Store for forwarding weekly mail.	\$19.67
02/23/2023	Fee to obtain copy of legal description for Tarrant County property for Lis Pendens.	\$11.50
02/24/2023	Filing Fee - Notice of Lis Pendens Tarrant County	\$249.66
02/24/2023	Fee for postage and supplies from UPS Store for forwarding weekly mail.	\$14.67
03/02/2023	Fee to obtain real property records on Ridgeview Addition from Johnson County Clerk.	\$83.00
03/03/2023	Fee for postage and supplies from UPS Store for forwarding weekly mail.	\$20.41
03/04/2023	Four deadbolt locks for 3600 Gillespie, Dallas, TX.	\$54.00
03/07/2023	Fee for Dallas Morning News publication of sale of DeSoto, Forney and Amerigold properties.	\$375.00
03/10/2023	Fee for postage and supplies from UPS Store for forwarding weekly mail.	\$19.67
03/16/2023	FedEx fee to deliver 7 copies of amicus brief to 5th Circuit Court of Appeals.	\$91.28
03/17/2023	Parking fee during hearing regarding motions to sell properties.	\$15.00
03/17/2023	Fee for postage and supplies from UPS Store for forwarding weekly mail.	\$19.67
03/28/2023	Fee for ordering HG21 key for FireKing safe.	\$18.55
03/31/2023	Fee for postage and supplies from UPS Store for forwarding weekly mail.	\$19.67

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**Expenses Subtotal** \$2,214.13

**Subtotal** \$12,724.63

## **SEC v. Barton – Claims Processing**

Date	Initials	Description	Hours	Rate	Client Total
01/11/2023	CCT	Correspondence with one Wall investor regarding claims process.	0.20	\$200.00	\$40.00
			Quantity Subt	otal	0.2
			Subt	otal	\$40.00

## SEC v. Barton – Asset Analysis and Recovery

Date	Initials	Description	Hours	Rate	Client Total
01/02/2023	CCT	Correspondence with B. Walker regarding J. Lindhauer interference in closing and funding of transaction; correspondence with counsel regarding same; additional review of working draft of response to Barton's motion to stay ratification of DLP agreement; revise same; correspondence with counsel regarding same; begin reviewing working draft of response to Barton's motion to stay at Fifth Circuit.	1.60	\$385.00	\$616.00
01/03/2023	CCT	Meeting and correspondence with counsel regarding record on appeal; correspondence with accountants regarding need for GL on Opelika property and status of access to QuickBooks accounts; correspondence with potential purchaser of DeSoto and Forney properties; meeting with potential purchaser of Rock Creek Property regarding lease; correspondence with title company regarding B. Walker closing; telephone conference with B. Walker regarding same; meeting with counsel to discuss Barton's refusal to pick up mattresses; correspondence with broker to potential purchaser of Turtle Creek; correspondence with appraiser on Amerigold, DeSoto, and Forney properties; review draft engagement letter regarding same; correspondence, telephone	5.90	\$385.00	\$2,271.50

	conference, and meeting with Receivership Bank regarding higher interest account; correspondence with potential purchaser of Amerigold property; telephone conference with broker on Rock Creek property; correspondence with counsel to DLP regarding termination of Memorandum of Agreement; correspondence with broker to potential interested buyers on Amerigold; meeting with counsel regarding  ; correspondence with potential interested purchaser of Receivership apartment assets; review HNGH's reply in support of motion to intervene and confirm ownership.			
01/04/2023 CC	Correspondence with counsel regarding  ; correspondence with broker to potential interested purchasers of Gillespie and Amerigold; telephone conference with M. Cooper (Pillar) regarding Opelika cost certification; telephone conference with Farmer Fuqua regarding same; review Farmer Fuqua engagement letters for annual audits; correspondence with Farmer Fuqua regarding same; review working draft of motion to be recognized as party in interest, etc.; revise same; telephone conference and correspondence with Greystone regarding status of cost certification and draws; correspondence with BC Contracting regarding status of liens; telephone conference with potential interested purchaser of 2999 Turtle Creek; review general liability policy for Amerigold; telephone conference with counsel regarding same; correspondence with title company regarding additional title commitments; review bank statements from 4Q2022.	7.30	\$385.00	\$2,810.50
01/05/2023 CC	Correspondence with HN Capital regarding potential meeting; telephone conference and correspondence with counsel regarding same review draft title commitment for Amerigold; correspondence with broker regarding same; correspondence with interested backup purchaser of Rock Creek; brief telephone conference and correspondence with V. Marugan regarding	3.90	\$385.00	\$1,501.50

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		Receivership; cursory review of SEC's response to Barton's motion to stay; meeting with counsel to discuss negotiations with City of Dallas regarding water bill; correspondence with Rock Creek tenant regarding same; review offering memorandum for Amerigold; correspondence with broker regarding potential revisions to same; review letter from Rice Assets, LLC confirming termination of contract; telephone conference with buyer's broker on Frisco property; correspondence with counsel on Ridgeview Addition; correspondence with receivership bank regarding status of accounts; telephone conference and correspondence with title company on Frisco property; correspondence with purchaser of Frisco property regarding status update.			
01/06/2023	CCT	Correspondence with buyer's broker on Frisco property; correspondence with title company regarding TC Hall property; correspondence with potential broker on property regarding same; telephone conference and correspondence with various potential purchaser of DeSoto and Forney properties; correspondence with counsel regarding appraisals on HUD apartments; correspondence with tenant at 4107 Rock Creek regarding change over of utilities; correspondence with T. Wells regarding need for cash accounting summary for Amerigold and Receivership; review Fifth Circuit's order denying motion to stay pending appeal; telephone conference and correspondence with counsel regarding same; review correspondence from Intuit regarding access to Quickbooks; correspondence with counsel regarding summary of Lost Creek litigation; telephone conference with counsel to DLP regarding order on motion to stay and surety bond.	2.80	\$385.00	\$1,078.00
01/09/2023	CCT	Correspondence with HN Capital regarding upcoming meeting; telephone conference and correspondence with counsel to Lillian Homes regarding agreement on Ridgeview Addition; correspondence with City of Venus regarding same; telephone conferences with brokers to potential purchasers of 2999 Turtle Creek; draft detailed updates to Receivership Website regarding latest motions and orders; meetings with counsel to prepare for and debrief after meeting with counsel to HN Capital regarding 2999 Turtle Creek; participate in same; correspondence with title company on B. Walker property; telephone	4.40	\$385.00	\$1,694.00

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		conference with broker for Amerigold regarding			
01/10/2023	CCT	Cursory review of Barton's Reply in support Motion to Stay DLP motion; review Barton's Notice of Non-Opposition to sale of Frisco; correspondence with counsel regarding same; telephone conference and correspondence with potential interested purchaser in receivership properties; correspondence with Rock Creek tenant regarding status of Fifth Circuit appeal; telephone conference and correspondence with B. Walker regarding closing; review draft cash accounting summary for Goldmark; correspondence with counsel regarding same; review working draft of purchase and sale agreement on DeSoto property; telephone conference with accountants regarding tax returns, communications with Intuit, and	5.70	\$385.00	\$2,194.50
01/11/2022	CCT	potential forensic accounting; telephone conference and correspondence with potential broker on Venus properties; review correspondence from Texas Workforce Commission; correspondence with counsel regarding same; correspondence with Rock Creek tenant regarding V. Barton interference and trespassing; correspondence with counsel regarding same;	2.00	\$295 AA	¢1.501.50
01/11/2023	CCT	Telephone conferences and correspondence with Rock Creek tenant regarding V. Barton interference and trespassing; telephone conference and correspondence with counsel regarding same; correspondence with V. Barton regarding same; correspondence with Tim Barton and counsel regarding personal mail, interference with Rock Creek sale, and other items; cursory review of mail to ensure T. Barton personal mail separated; meeting with counsel to discuss working draft of PSA on DeSoto property; correspondence with potential interested purchaser in HUD apartments; correspondence with auditor on HUD apartments.	3.90	\$385.00	\$1,501.50
01/13/2023	ССТ	Correspondence with Greystone regarding balance on HUD loans; correspondence with potential purchaser regarding same; correspondence with Greystone regarding status of funding on remaining Opelika draws; correspondence with counsel to property manager regarding same;	0.40	\$385.00	\$154.00
01/15/2023	ССТ	Correspondence with M. Cooper regarding Ridgeview Addition; correspondence with R. Marx regarding same; correspondence with accountant	0.80	\$385.00	\$308.00

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		regarding 4Q22 SFAR; correspondence with Dallas Morning News regarding notice for sale of Frisco Gate Property; correspondence with J. Patton regarding status of Frisco sale.			
01/17/2023	CCT	Telephone conference and correspondence with Dallas Morning News confirming notice; telephone conference with broker on Amerigold regarding LOI; correspondence with broker to potential purchasers of Ingleside and Opelika; lengthy meeting with brokers regarding receivership properties; telephone conference with Greystone regarding funding of Draw 22 on Opelika; telephone conference with R. Marx regarding CAD file; draft update to Receivership website; correspondence with potential interested purchaser of HUD apartments; correspondence with broker on Rock Creek regarding status; continued review of working draft of PSA on Desoto property; finish drafting HUD questionnaire; send same to C. Cooper.	5.10	\$385.00	\$1,963.50
01/18/2023	CCT	Prepare for meeting with B. Walker; participate in same; telephone conference with Lillian Homes regarding CAD file; correspondence with counsel regarding same; telephone conference with R. Salem regarding request to extend due diligence period; telephone conference with counsel regarding same; correspondence with appraiser regarding LOIs for DeSoto and Forney; correspondence with accountants regarding Amerigold Suites, access to QuickBooks, and D4OP GL; correspondence with Amerigold broker regarding existing survey; correspondence with contractor on Opelika property regarding cost certification; correspondence with counsel regarding ; correspondence with independent auditor regarding status of Borrrower's cost certification on Opelika.	4.70	\$385.00	\$1,809.50
01/19/2023	CCT	Correspondence with independent auditor regarding records from Greystone; correspondence with counsel to interested purchasers of receivership property; telephone conference with D. Kahan regarding properties owned by DJD; telephone conference with discovery expert regarding imaging electronic devices at Turtle Creek; prepare for meeting with M. Cooper, D. Phillips, and Lillian Homes regarding Ridgeview Addition; attend same; debriefing meeting with counsel regarding same.	2.40	\$385.00	\$924.00

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01/20/2023	CCT	Correspondence with counsel regarding; telephone conference and correspondence with broker on Amerigold regarding call with potential purchaser; participate in same; review LOI; revise same; correspondence with broker regarding same; telephone conference and correspondence with accountants regarding status of requests to QuickBooks and general ledger and trial balance for D4OP; correspondence with Greystone regarding outstanding matters; call with potential broker regarding requested BOVs; telephone conference with M. Cooper regarding Pillar payments to JMJ; correspondence with counsel regarding working drafts of motion to intervene in Rock Creek Appeal and Motion to Dismiss same.	2.50	\$385.00	\$962.50
01/22/2023	CCT	Correspondence with DLP regarding LOIs on Ingleside and Opelika and potential LOIs on Bellwether and Windmill Farms.	0.10	\$385.00	\$38.50
01/23/2023	CCT	Review LOIs from DLP on Bellwether and Windmill Farms; correspondence with appraiser regarding status of appraisals on Bellwether and Windmill Farms; meetings with counsel to discuss ; review additional LOI on Amerigold; correspondence with broker regarding same; correspondence with Greystone regarding final endorsement planning call; correspondence with M. Cooper; correspondence with J. Patton regarding update on Frisco transaction; meeting and correspondence with counsel to discuss ; correspondence with potential interested purchaser of Venus properties; correspondence with City Administrator for City of Venus.	2.90	\$385.00	\$1,116.50
01/24/2023	CCT	Telephone conference with T. Roberts regarding Venus properties; review draft letter to attorneys regarding source of funds; revise same; correspondence with S. Latham regarding Johnson County foreclosure records; correspondence with title company regarding Receivership Properties; review correspondence from potential purchaser of Amerigold; telephone conference with broker on Amerigold regarding same; review letter to M. Barton regarding Gillespie tenants; revise same; correspondence with counsel regarding same; review draft addendum to Frisco PSA; revise same;	3.80	\$385.00	\$1,463.00

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		compound and a with D. C-1			
		correspondence with R. Salem regarding same; telephone conference and correspondence with potential purchaser of Venus properties; meeting with counsel to discuss HN Capital dispute; correspondence with M. Cooper regarding Opelika loan information.			
01/25/2023	CCT	Correspondence with potential broker on Hall property; correspondence with counsel regarding same; correspondence and telephone conference with accountants regarding needed documents for accountants related to Goldmark and Opelika; telephone conference and correspondence with property manager at Amerigold regarding same; correspondence with M. Cooper regarding supplemental draw request from General Contractor; correspondence with potential interested purchasers in HUD properties; call with D. Crow regarding table; meeting with potential interested purchaser of Venus properties; meeting with counsel to discuss ; review updated LOI on Amerigold property; correspondence with broker regarding same; review correspondence from City of Venus Adminstrator regarding Ridgeview; correspondence with M. Cooper and Lilian Homes regarding same;	3.50	\$385.00	\$1,347.50
01/26/2023	CCT	Correspondence with broker regarding signed LOI; telephone conference with Greystone team regarding loan endorsement kick-off; telephone conference with C. Jackson regarding Opelika; meetings with counsel to discuss ; meeting with counsel to discuss ; cursory review of title commitment on DeSoto property; correspondence with property manager at Amerigold regarding tax documents; correspondence with accountant regarding same; correspondence with potential purchaser of receivership properties; correspondence with potential purchaser of HUD properties; cursory review of working draft of notice of publication and addendum; correspondence with J. Patton regarding hearing on motion to approve sale of Frisco property; correspondence with additional potential purchaser of receivership property; correspondence with counsel regarding ; correspondence with B. Walker	3.70	\$385.00	\$1,424.50

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		regarding escrowed funds; correspondence with counsel regarding			
01/27/2023	CCT	Draft settlement demand to HN Capital; send same; meeting with counsel to discuss ; telephone conference with C. Cooper regarding PSA on DeSoto and Forney properties; correspondence with purchaser of Frisco Gate; telephone conference and correspondence with potential interested purchasers of HUD properties; correspondence with Rock Creek purchaser regarding tree limb; correspondence with broker regarding same; telephone conference and correspondence with counsel regarding ; review additional LOI from potential Amerigold purchaser; correspondence with counsel regarding correspondence with counsel regarding correspondence with counsel regarding carpet cleaning at Amerigold.	4.20	\$385.00	\$1,617.00
01/31/2023	CCT	Telephone conference with potential purchaser of Frisco property regarding parking issue; review agreement regarding same.	0.30	\$385.00	\$115.50
01/31/2023	CCT	Review draft title commitment for Windmill Farms from Texas Republic Title; correspondence with title company; correspondence with lender on Amerigold; cursory review of cost certification on Opelika project from contractor; correspondence with contractor regarding same; correspondence with independent auditor regarding same; review telephone conference with counsel regarding same; telephone conferences with brokers on Rock Creek property regarding tree limb; telephone conference with potential broker on Hall Street properties; correspondence with counsel regarding D4OP bank accounts; correspondence with accountants regarding W-9s for contractors at Amerigold; correspondence with counsel to potential purchase of DeSoto and Forney regarding PSA; telephone conference with broker to purchaser regarding same; correspondence with potential interested purchaser in HUD apartments; correspondence with US Trustee's office regarding pending bankruptcies; participate in telephonic hearing on	6.10	\$385.00	\$2,348.50

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	sale of Frisco Property; telephone conference and correspondence with J. Patton regarding same; telephone conference with counsel regarding; telephone conference with accountant regarding Opelika cost certification; review order approving sale of Frisco Gate property; correspondence with potential purchaser regarding same; correspondence with title company regarding same; correspondence with broker regarding Rock Creek tree issues.			
02/01/2023 CCT	Telephone conference with counsel regarding  ; correspondence with lender on Amerigold regarding insurance policy; telephone conference with potential interested purchaser of Receivership property; correspondence with potential broker on HUD apartments; review letter from counsel to M. Barton regarding Gillespie property; correspondence to counsel for owner of Villita property; correspondence with counsel to potential interested purchaser of Hall properties regarding upcoming meeting; correspondence with counsel regarding ; correspondence with auditor regarding Third Coast bank statements for D4OP; correspondence with accountant regarding same; correspondence with counsel regarding	2.10	\$385.00	\$808.50
02/02/2023 CCT	Telephone conference with broker representing potential buyer on Frisco property; telephone conference with potential interested purchaser in 2999 Turtle Creek; telephone conference with Palmetto Capital and counsel regarding potential revisions to PSA; correspondence with B. Walker regarding status of sending documents; correspondence with potential broker on HUD properties; review draft letter to counsel for M. Barton regarding Gillespie property; correspondence with counsel regarding same; telephone conference with R. Salem regarding needed documents; correspondence with counsel regarding newly discovered entities; review additional documents from B. Walker regarding funds received from Barton; begin review bank records for purposes of same; telephone conference with counsel regarding granding; perform diligence on potential purchases of receivership properties.	3.90	\$385.00	\$1,501.50

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02/03/2023	CCT	Telephone conference with homeowner with claim against Wall entity; cursory research of same; telephone conference with title company regarding update on property sales; correspondence with HUD expert regarding cost certification; correspondence with counsel regarding igo.  Correspondence with counsel regarding IGO Master Development Agreement and PSA; correspondence with R. Salem regarding same; cursory review of IGO PSA; correspondence with counsel regarding igorement is review correspondence from counsel to HN Capital; meeting with counsel to discuss same; correspondence with US Trustee's office regarding potential meeting; telephone conference with HUD experts on cost certification; correspondence with Greystone regarding same; correspondence with accountant regarding same; telephone conference with broker to potential purchaser of receivership property.	3.80	\$385.00	\$1,463.00
02/05/2023	CCT	Correspondence with broker on Rock Creek property regarding tree limbs impacted by recent weather; correspondence with T. Wells regarding same.	0.10	\$385.00	\$38.50
02/06/2023	CCT	meeting with T. Wells to discuss  ; telephone conference with broker to potential purchaser of Amerigold; correspondence with purchaser of Rock Creek regarding second extension of closing date; telephone conference and correspondence with broker regarding same; review extension of closing date; execute same; telephone conference with potential purchaser of HUD properties; correspondence with purchaser of Frisco Gate regarding PSA amendments; telephone conference with US Trustee's office for E.D. Tex. and N.D. Tex. regarding pending bankruptcies; correspondence with attorney to potential purchaser of Amerigold regarding draft PSA; telephone conference and correspondence with counsel regarding same; telephone conference with counsel regarding telephone conference with accountant regarding continued work on D4OP general leger and trial balance; telephone conference with Greystone regarding same; correspondence with M. Cooper	3.80	\$385.00	\$1,463.00

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		(Pillar) regarding same; multiple telephone conferences with counsel to creditors on 2999 Turtle Creek property.			
02/07/2023	CCT	Correspondence with Greystone regarding backup for draw requests and sources and uses; correspondence with accountant regarding same; correspondence with potential interested purchaser in HUD apartments; correspondence with counsel to Kileen property owner regarding participation interest; correspondence with Liberty Bankers regarding Ridgeview and other loans; telephone conference and correspondence with multiple potential interested purchasers of receivership property; correspondence with counsel to other potential purchaser of Hall and Gillespie properties; correspondence with counsel regarding meeting with counsel to discuss ; review Audit requests regarding HUD properties; inspect supporting backup and contractual documents for purposes of same; correspondence with auditors regarding same; correspondence with counsel to potential purchaser of Amerigold property.	3.30	\$385.00	\$1,270.50
02/08/2023	CCT	Prepare for meeting with potential purchasers of Hall and Gillespie properties; participate in same; correspondence with counsel regarding; correspondence with appraiser regarding needs for appraisal on 2999 Turtle Creek and Hall Street properties; correspondence with counsel to potential purchaser of DeSoto and Forney regarding status of revised PSA; prepare for call with B. Phillips to discuss Ridgeview Addition; participate in same; begin cursory review of revisions to DeSoto PSA from buyer's counsel; correspondence with counsel regarding same.	2.70	\$385.00	\$1,039.50
02/09/2023	CCT	Correspondence with accountants regarding additional information for Opelika general ledger and trial balance; correspondence with potential broker on Hall properties; telephone conference with accountant regarding status of D4OP general ledger; meeting with T. Wells to discuss ; correspondence with title company regarding need for title report on Ridgeview Addition; continue reviewing	4.80	\$385.00	\$1,848.00

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		buyer's revisions to DeSoto PSA; telephone conference with counsel regarding same; begin reviewing draft PSA from Amerigold buyer; review insurance documents for Gillespie property; correspondence with counsel regarding ; correspondence with approved purchaser of Frisco property; telephone conference and correspondence with potential purchaser of Receivership property.			
02/10/2023	CCT	correspondence with counsel regarding; telephone conference with potential broker on Hall properties; telephone conference and correspondence with potential broker on Venus properties; telephone conference with appraiser on Amerigold property; cursory review of amendments to Frisco PSA with IGO; telephone conference with R. Salem regarding same; review HN Capital's "Supplement" to Motion to Intervene and confirm ownership; meeting with counsel to discuss same; secure Gillespie property; telephone conference and correspondence with counsel regarding same.	4.10	\$385.00	\$1,578.50
02/12/2023	CCT	Cursory review of working drafts of motion to intervene and motion to dismiss; correspondence with counsel regarding same.	0.30	\$385.00	\$115.50
02/13/2023	CCT	Correspondence with broker regarding potential meeting at Gillespie; correspondence with window company regarding missing glass at Gillespie; correspondence with counsel regarding same; begin reviewing working draft of motion to approve sale of Forney property; begin revising same; correspondence with counsel regarding status of PSA; correspondence with title company regarding extended closing date on Rock Creek property; correspondence with counsel regarding same; telephone conference with real estate advisor; telephone conference and correspondence with R. Marx; telephone conference with broker representing	3.90	\$385.00	\$1,501.50

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potential purchaser of Hall properties; review engagement letter for Hall and Turtle Creek properties; correspondence with appraiser regarding needed revisions to same; telephone conference with potential purchaser of Turtle Creek property; correspondence with Veracity Forensics regarding status of imaging and initial analysis.

#### 02/14/2023 CCT

Meeting with T. Wells to discuss
; correspondence
with potential interested purchaser of receivership

with potential interested purchaser of receivership properties; meeting with potential broker at Gillespie property; correspondence with J. Kane regarding order to mediate; correspondence with counsel regarding

correspondence with M. Cooper regarding taxes on Forney property; telephone conference with counsel regarding ; telephone conference with potential purchaser of Forney and DeSoto assets regarding status of PSA revisions; review statement of no loss on Rock Creek property; correspondence regarding same; telephone conference with C. Koons regarding imaged hard drives; correspondence with accountants regarding status of D4OP general ledger; correspondence with J. Patton regarding status of Frisco sale and Turtle Creek property; correspondence with title company regarding status of Frisco sale.

#### 02/15/2023 CCT

Review detailed correspondence from potential purchaser of Frisco Gate property regarding outstanding items needed for closing; correspondence with counsel regarding repairs needed to receivership plane; correspondence with M. Cooper regarding taxes for Forney property; cursory review of Barton's response to Motion to Ratify agreement with Lumar Land; review working draft of reply to same; revise same; meeting with counsel to discuss same; telephone conference with accountant regarding status of general ledger and trial balance for D4OP; correspondence with IT expert regarding computer encryption; continue substantial revisions and additions to motion to approve sale of Forney property; telephone conference with potential broker on Venus properties; telephone conferences and correspondence with potential appraiser on various receivership properties; call with J. Kane

4.10 \$385.00 \$1,578.50

5.90 \$385.00 \$2,271.50

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		regarding 2999 Turtle Creek mediation; telephone conference with potential purchaser of Frisco property regarding parking issues; meeting with counsel to discuss			
02/16/2023	CCT	Finish revising working draft of motion to approve sale of Forney property; correspondence with counsel regarding same; correspondence with Judge Hale regarding mediation of dispute with HN Capital; correspondence with Greystone regarding permission to communicate with property managers; correspondence with potential purchaser of receivership properties; correspondence with potential Broker for Hall property; cursory review of mail identified as personal; correspondence with M. Barton regarding same; telephone conference with counsel to purchaser of DeSoto and Forney properties; correspondence with potential purchaser of Venus properties; review letter from M. Edney regarding identification of accountants and access to information; correspondence with counsel regarding same; review comps from broker on Gillespie property; cursory review of potential listing agreement for Hall property; correspondence with counsel regarding same; telephone conference with real estate advisor regarding property sales.	5.60	\$385.00	\$2,156.00
02/17/2023	CCT	Telephone conference with counsel regarding; review counsel's revisions to working draft of motion to approve Forney sale; additional revisions to same; review working draft of revisions to listing agreement with potential broker on TC Hall property; telephone conference and correspondence with potential broker regarding same; meeting with former Barton employee regarding accounting, business operations, etc.; correspondence with discovery vendor regarding status of imaging computers; correspondence with potential appraiser of various Barton properties.	3.50	\$385.00	\$1,347.50
02/20/2023	CCT	Correspondence with accountants regarding QuickBooks files; correspondence with counsel regarding same.	0.20	\$385.00	\$77.00
02/21/2023	CCT	Correspondence and telephone conference with counsel to potential purchaser of TC Hall property; correspondence with counsel to Palisades; review working draft of revisions to Amerigold purchase	5.60	\$385.00	\$2,156.00

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and sale agreement; correspondence with counsel regarding same; correspondence with counsel to purchaser of DeSoto and Forney properties requesting status update on PSAs; begin reviewing general ledger and trial balance for D4OP; correspondence with accountants regarding same; correspondence with Greystone regarding reserve balances for DeSoto and Forney properties; correspondence with Veracity Forensics regarding QB passwords; review correspondence from JAMS regarding HN Capital mediation; correspondence with counsel regarding same; telephone conference with counsel regarding ; review draft letter to M. Edney; correspondence with counsel regarding same; meeting with counsel to discuss ; prepare for call with B. Walker; review execution versions of PSAs on DeSoto and Forney properties; continue reviewing audit confirmations from Southern Properties; correspondence with broker on Amerigold property regarding status; telephone conference and correspondence with potential purchaser of Venus properties; correspondence with mediator of HN Capital dispute; correspondence with City Administrator for City of Venus; lengthy telephone conference with potential purchaser of

02/22/2023 CCT

Correspondence with counsel regarding

Receivership Properties.

; review proposed

6.10

\$385.00

\$2,348.50

revisions to appraiser engagement letter; correspondence with appraiser regarding same; review working drafts of motion to approve DeSoto and Forney sales; revise same; correspondence with counsel regarding same; correspondence with M. Cooper regarding audit requests; correspondence with potential purchaser of Turtle Creek property; telephone conference with potential broker regarding potential listing of TC Hall property; correspondence with counsel to potential purchaser of Amerigold property; correspondence with potential receivership banks; review additional backup from Pillar regarding status of loans; telephone conferences with M. Cooper regarding same and motions to sell DeSoto and Forney; correspondence with Veracity Forensics regarding search for QB passwords; correspondence with accountants regarding same; telephone conference with attorney to potential purchaser of Amerigold property; draft posting for

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	Receivership website regarding sales of DeSoto and Forney; correspondence with potential interested purchaser of HUD properties; correspondence with Palmetto regarding filed motions; telephone conference with counsel and SEC regarding motions to sell Forney and DeSoto.			
02/23/2023 CCT	Correspondence with JAMs regarding mediator fee; correspondence with counsel regarding objections to requests for documents; correspondence with counsel regarding same; continued correspondence with Veracity Forensics regarding QB passwords; correspondence with potential interested purchaser in HUD properties; continue researching contact information for members of accounting group; continue attempts to contact same; correspondence with potential purchaser of Venus properties; meetings with counsel to discuss correspondence with potential appraiser on Ridgeview property; correspondence with Liberty Bankers regarding same and prior payments; telephone conference with R. Magno; correspondence with counsel regarding preview engagement letter for appraisal of Ridgeview Additions; revise same; correspondence with appraiser regarding same; telephone conference and correspondence with accountants regarding status of forensic accounting; review working draft of motion to compel information regarding source of attorneys' fees; telephone conference with B. Walker.	3.40	\$385.00	\$1,309.00
02/24/2023 CCT	Revise working draft of letter to Turtle Creek Tower LLC; correspondence with counsel regarding ; prepare for call with B. Phillips regarding proposed resolution for Ridgeview sale; participate in same; telephone conference with counsel regarding same; correspondence with Receivership bank regarding receivership accounts; correspondence with title company regarding DeSoto and Forney sales.	1.60	\$385.00	\$616.00
02/24/2023 CCT	Review documents at Turtle Creek office in attempt to find additional QuickBooks and other information. [Rate reduced because of extended time spent searching.]	3.10	\$200.00	\$620.00
02/27/2023 CCT	Correspondence and lengthy telephone conference	3.50	\$385.00	\$1,347.50

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		with potential purchaser of Turtle Creek and Hall properties; correspondence with counsel regarding; correspondence with auditor regarding status of review of Southern Properties' loan balances; correspondence with M. Cooper regarding same; correspondence with C. Braun regarding meeting to discuss Villita participation agreement; review and execute engagement letters from appraiser on Ridgeview, Venus properties, and Hall and Gillespie properties; telephone conference with potential broker on Hall property; begin reviewing documents from Liberty Bankers regarding outstanding loans; telephone conference with broker on Amerigold property; correspondence with accountants regarding request from TWC; correspondence with auditor regarding status of Opelika GL and TB; meeting with counsel to discuss additional revisions to Amerigold PSA; correspondence with counsel regarding same.			
02/28/2023	CCT	Telephone conference with counsel regarding; prepare for call with Pate Jones regarding lien on Ridgeview Addition; participate in same; cursory review of T. Barton's brief on sale of Rock Creek; telephone conference with counsel regarding same; telephone conference and correspondence with potential purchaser of HUD properties; review working draft of reply in support of motion to compel; revise same; correspondence with R. Salem regarding status of due diligence into parking issues; review working drafting of motion to approve sale of Amerigold property; begin revising same; correspondence with purchaser of Amerigold regarding status of executed PSA; correspondence with counsel to Killeen project regarding status of negotiation of participation interest; correspondence with potential purchaser of Venus properties.	5.20	\$385.00	\$2,002.00
03/01/2023	CCT	Trip to Amerigold to visit with property manager regarding potential sale and to deliver pay checks. [No charge]	0.90	\$0.00	\$0.00
03/01/2023	ССТ	meeting with counsel to discuss  ; correspondence with counsel to purchaser of Amerigold regarding execution version of PSA; correspondence with potential purchaser of Venus properties; correspondence with purchaser of Windmill Farms	4.90	\$385.00	\$1,886.50

regarding requested due diligence information; correspondence with M. Cooper regarding status of requested information for audit confirmations; continue revising reply in support of motion to compel compliance with Receivership Order; correspondence with counsel regarding same; prepare for call with Circle C regarding lien on Ridgeview Addition; participate in same; continue revising motion to approve sale of Amerigold; correspondence with counsel regarding same; correspondence with potential purchaser of TC Hall property; review working draft of mediation statement regarding dispute with HN Capital; telephone conference with potential purchaser of Venus properties; correspondence with appraiser regarding Venus properties; prepare for call with counsel to owner of Killeen property; participate in same; correspondence with potential purchaser of HUD properties; review letter from M. Barton counsel regarding claimed personal property; correspondence with counsel regarding same; correspondence with lender on Amerigold property.

03/02/2023	CCT
0.3/02/2023	

Review revised working draft of general ledger and trial balance for D4OP; correspondence with accountant regarding same; correspondence with potential purchaser of Venus properties; continue reviewing working draft of mediation statement for mediation with HN Capital; continue revising same; meetings with counsel to discuss same; telephone conference with appraiser regarding Venus properties; review orders surrounding hearings on motions to sell DeSoto, Forney, and Amerigold; correspondence with M. Cooper regarding same; correspondence with counsel to HNGH regarding upcoming mediation; correspondence with counsel regarding

; correspondence with Amerigold purchaser regarding hearing on motion to approve sale; draft updates for receivership website regarding sale of Amerigold and hearings on recent motions; telephone conference with R. Salem regarding need for further extension of deadlines under contract.

03/03/2023 CCT

Continue revising working draft of HNGH mediation statement; correspondence with counsel regarding same; telephone conference and correspondence with counsel regarding

4.30 \$385.00 \$1,655.50

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2.90

\$385.00 \$1,116.50

		working draft of letter to M. Edney regarding same; revise same; review copy for notice of sale for publication; review draft copy for Dallas Morning News notice of sale; correspondence with Dallas Morning News regarding same; correspondence with potential purchaser of Venus properties; review correspondence from contractor and Greystone regarding retainage; telephone conference with civil engineer on Venus properties.			
03/04/2023	ССТ	Meeting with T. Wells at Gillespie property to change locks and assess broken windows prior to insurance inspection. [No charge]	1.40	\$0.00	\$0.00
03/06/2023	CCT	Correspondence with counsel regarding ; review lease to confirm same; correspondence with counsel regarding ; correspondence with accountants regarding QuickBooks; meeting with counsel regarding QuickBooks; meeting with counsel regarding iscuss ; correspondence with potential purchaser of Venus properties; meeting with counsel to discuss ; telephone conference with B. Walker regarding status of document requests to Brand Bank; review same; follow-up correspondence with B. Walker regarding same; telephone conference and correspondence with S. Mudigere regarding status of sale; correspondence with broker regarding same; continue reviewing working draft of general ledger and trial balance for D4OP; correspondence with purchaser of Frisco property regarding status of parking issue; telephone conference with potential interested purchaser in 2999 Turtle Creek; continue reviewing working draft of letter to M. Barton regarding alleged personal property; finish revising same; meeting and correspondence with Dallas Morning News regarding status of publication; prepare for pre-mediation call with Judge Hale and counsel; participate in same; correspondence with appraiser on Turtle Creek property; telephone conference and correspondence with S. Huser regarding D4OP general ledger and QuickBooks accounts; correspondence with M. Cooper regarding missing information for D4OP cost certification; telephone conference and correspondence with purchaser of Frisco property regarding status of resolving parking issues.	6.40	\$385.00	\$2,464.00

03/07/2023	CCT	Correspondence with counsel regarding ; review amendment to Rock Creek contract to extend closing date; correspondence with counsel regarding ; correspondence with counsel regarding upcoming HNGH mediation; telephone conference and correspondence with Veracity Forensics regarding QuickBooks accounts; review folder listing for same; correspondence with purchaser of DeSoto and Forney properties regarding due diligence requests; continue reviewing working draft of motion to compel attorneys to provide information regarding source of funds; correspondence with potential purchaser of Turtle Creek property; correspondence with potential broker on TC Hall property;	1.90	\$385.00	\$731.50
03/08/2023	CCT	Correspondence with counsel to Amerigold buyer regarding certificate of occupancy; begin reviewing Barton's response to fee application; begin outlining reply to same; review cursory research on same; correspondence with Greystone regarding contractor's request for release of retainage; review working draft of letter to SBA regarding loans; correspondence with counsel regarding same; correspondence with Judge Hale regarding good faith component of potential fraudulent transfer claim; telephone conference and correspondence with Farmer Fuqua regarding Opelika and Ingleside audits; correspondence with M. Cooper regarding loan audits and accrued interest; correspondence with potential purchaser of Venus properties; cursory review of documents for Liberty Bankers; telephone conference with T. Wells regarding same; correspondence with potential purchaser of Turtle Creek property; correspondence with City of Venus regarding Ridgeview and other Venus properties.	3.10	\$385.00	\$1,193.50
03/08/2023	CCT	Correspondence with City of Venus regarding Ridgeview Addition citations; cursory review of research related to potential fraudulent transfer claims against HNGH; finish revising working draft of motion to compel information surrounding source of Barton's attorneys' fees, including drafting provision discussing newly discovered relevant information; prepare for pre-mediation caucus with Judge Hale; participate in same; telephone conference with potential purchaser of TC Hall property; review updated draft of D4OP general ledger and trial balance; correspondence	4.30	\$385.00	\$1,655.50

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		with auditor regarding same; telephone conference with counsel to Palisades; correspondence with M. Edney regarding retainage request from contractor; correspondence with contractor regarding same.			
03/10/2023	CCT	Prepare for HNGH mediation at JAMS; attend same; correspondence with appraiser regarding TC Hall property; telephone conference with counsel to potential purchaser of Receivership properties. [time reduced from 9.3 total hours for time during mediation breaks spent on other matters].	7.90	\$385.00	\$3,041.50
03/12/2023	CCT	Correspondence with counsel regarding	0.30	\$385.00	\$115.50
03/13/2023	CCT	Begin reviewing Barton's and Southern Properties' responses to motions to sell Desoto, Forney, and Amerigold properties; lengthy telephone conferences with counsel regarding same; correspondence with Byron Walker regarding settlement negotiations; telephone conferences with accountant regarding QSF designation and extensions; correspondence with accountants regarding tax return extensions; correspondence with S. Latham regarding same; correspondence with potential interested purchaser of DeSoto and Forney properties.	3.90	\$385.00	\$1,501.50
03/14/2023	CCT	Correspondence with counsel to potential interested purchaser of HUD properties; correspondence with various other potential interested purchasers; correspondence with counsel regarding same; strategy call with counsel regarding same; strategy call with counsel regarding status of settlement talks; telephone conference with T. Huffman regarding Opelika retainage request; correspondence with BC Contracting regarding same; cursory review of draft amendment to Frisco sale; correspondence with counsel to Frisco purchaser regarding same; correspondence with R. Magno regarding Venus properties; correspondence with counsel regarding correspondence with appraiser regarding status of Turtle Creek and Hall properties; correspondence with purchaser of DeSoto and Forney properties regarding Responses filed by Barton and Southern Properties; review working draft of motion to	3.10	\$385.00	\$1,193.50

		continue hearing on motion to approve sales of HUD properties.			
03/15/2023	CCT	Telephone conference with counsel regarding  ; correspondence with potential interested purchasers regarding same; continued correspondence with B. Walker regarding potential settlement; correspondence with counsel to Frisco purchaser regarding short extension of due diligence period; telephone conference with counsel regarding  ; correspondence with accountant regarding status of appraisals on Turtle Creek and Hall properties; correspondence with broker on Amerigold regarding status of sale.	1.10	\$385.00	\$423.50
03/16/2023	CCT	Correspondence with appraiser regarding status of appraisal on Hall property; correspondence with potential interested purchaser of Venus properties; telephone conference with broker on Amerigold property; telephone conference with counsel regarding same; correspondence with potential purchaser of HUD properties; correspondence with Greystone regarding additional loan documents.	0.80	\$385.00	\$308.00
03/17/2023	ССТ	Finish reviewing working draft of motion to sell Amerigold; revise same; correspondence with counsel regarding same; correspondence with potential interested purchaser in Turtle Creek property.	0.70	\$385.00	\$269.50
03/20/2023	CCT	Correspondence and telephone conference with potential interested purchasers of Turtle Creek property; correspondence with T. Huffman regarding D4OP retainage documents; correspondence with Opelika contractor regarding same; telephone conference and correspondence with Greystone regarding same; correspondence with accountants regarding tax filings; meeting with counsel to discuss hearing on Motion to Approve sale of Amerigold; attend same; telephone conference with appraiser regarding status of Ridgeview Appraisal; finish reviewing audit requests and supporting documentation form Southern Properties' auditors; begin drafting exhibits to attach to audit responses; correspondence with auditors regarding same; cursory review of D4OP general ledger for land acquisition and escrow costs; correspondence with	5.80	\$385.00	\$2,233.00

		accountants regarding same; attend hearing on motion to sell Amerigold Suites; conferences with counsel regarding same; review working draft of motion to compel information on attorneys' fees; revise same; correspondence with counsel regarding same; correspondence with broker regarding same; correspondence with buyer and buyer's broker regarding same; correspondence with lender regarding same; lengthy strategy meeting with counsel			
03/21/2023	CCT	Correspondence with counsel regarding; correspondence with Opelika contractor regarding status of retainage request; correspondence with counsel regarding; telephone conference with potential broker on Hall property; continue drafting exhibits to attach to audit confirmations for HUD properties; complete edited audit confirmations; correspondence with auditors regarding same; telephone conference with counsel to Palisades regarding status Frisco sale and Turtle Creek; telephone conference with appraiser on Turtle Creek and Hall properties; continue review of documents from B. Walker for purposes of settlement offer; correspondence with B. Walker regarding same; prepare for and participate in lengthy call with former Barton employee; telephone conference with buyer group regarding status of DeSoto and Forney sales; telephone conference with Frisco purchaser regarding status of sale; begin reviewing summary of Dixon dispute from counsel.	6.40	\$385.00	\$2,464.00
03/22/2023	CCT	Continue preparing for meeting with Dixon and Lumar; meeting with counsel to discuss same; attend same; correspondence with Judge Hale regarding potential mediation of same; telephone conference with V. Nambiar; meeting with counsel to discuss ; telephone conference with potential auctioneer regarding Turtle Creek office; telephone conference with broker to potential interested purchaser of Gillespie property; telephone conference with broker to potential purchaser of HUD properties; telephone conference with broker on Amerigold property; begin reviewing HUD audits for D4DS and D4FR; correspondence with City of Venus; correspondence with potential auctioneer regarding artwork; correspondence with potential interested	6.20	\$385.00	\$2,387.00

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		purchaser of Hall property.			
03/23/2023	CCT	Correspondence with potential auctioneer of artwork; continue reviewing HUD Audit confirmations; telephone conference with buyer team regarding next steps in due diligence; telephone conference with potential purchaser of HUD properties; prepare for meeting with accountants to discuss tax issues, forensic accounting, and other accounting issues; cursory review of Barton's motion for leave to file surreply; review Receivership bank options; review initial title commitment on Goldmark; correspondence with V. Nambiar regarding meeting at 2999 Turtle Creek; telephone conference with HUD expert; correspondence with multiple potential interested purchasers in Receivership properties; correspondence with appraiser on Hall and Gillespie properties; correspondence with counsel to Dixon regarding potential mediation.	6.40	\$385.00	\$2,464.00
03/24/2023	CCT	Telephone conference and correspondence with potential auctioneer of artwork; correspondence with accountants regarding update meetings; correspondence with auditor regarding HUD Audits for D4DS and D4FR; correspondence with JAMs regarding mediation with Dixon and JAMs; correspondence with counsel to Dixon and Lumar regarding same; review certifications and proposed correspondence regarding same; brief conference with counsel to discuss same; correspondence with Greystone regarding property manager agreements for D4DS and D4FR; cursory review of auction agreements from Lonestar and J. Garrett; prepare for telephone conference with J. Halverson regarding status of Amerigold sale; participate in same; telephone conference and correspondence with T. Huffman regarding HUD documents and personal property; correspondence with potential purchaser of Venus properties; correspondence with potential purchaser of HUD properties; correspondence with potential HUD expert; meeting with representatives of HN Capital at 2999 Turtle Creek; correspondence with contractor regarding status of Opelika retainage request.	6.60	\$385.00	\$2,541.00
		status of Openka retainage request.			

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		Hall properties; correspondence with HUD expert; prepare for call with City of Venus; participate in same; meeting with counsel to discuss  ; review working draft of engagement letter with HUD expert; review communications from HUD expert and extensive regulatory support; continue review Pillar loan documents; meeting with counsel to discuss same.			
03/28/2023	ССТ	Trip to Amerigold to deliver paychecks and discuss status of sale with property manager. [No charge]	0.80	\$0.00	\$0.00
03/28/2023	CCT	Correspondence with T. Wells regarding ; continue review B. Walker background documents and agreements for potential settlement; lengthy telephone conference with counsel regarding same; telephone conference with potential auctioneer or Turtle Creek artwork and antiques; regarding sale of contents of Turtle Creek office; telephone conference with potential purchaser of receivership properties; telephone conference and correspondence with auctioneer of Turtle Creek office furnishings regarding potential auction; continued review of working draft of personal property letter; meeting with counsel to discuss same; other various correspondence and communications regarding Receivership properties and other action items.	4.80	\$385.00	\$1,848.00
03/29/2023	ССТ	Prepare for telephone conference with B. Walker regarding potential settlement; participate in same; travel to Turtle Creek office to meet with potential property manager and to continue inspection of contents in preparation for move of paper documents and auction.	3.40	\$385.00	\$1,309.00
03/30/2023	CCT	Correspondence with Opelika contractor regarding status of retainage request; correspondence with counsel for T. Barton regarding same; meeting with A. Carrillo to discuss ; correspondence with auctioneers regarding contents of Turtle Creek property; correspondence with accountants regarding status of W2s; lengthy telephone conference and correspondence with former Receivership Entity employee regarding same and other background items; correspondence with potential interested purchaser of Venus properties; telephone conference with appraiser for	3.70	\$385.00	\$1,424.50

Venus properties; telephone conference with T. Huffman; correspondence with potential purchaser of receivership properties; multiple telephone conferences and correspondence with C. Koonce to discuss

03/31/2023 CCT

Review working draft of response to motion to intervene and motion to stay; telephone conference with counsel regarding same; correspondence with purchaser of Frisco property; telephone conference with potential purchaser of Venus properties; correspondence with counsel regarding ; correspondence with appraiser regarding status of Ridgeview property; begin reviewing working draft of motion to

approve settlement; begin revising same

3.50 \$385.00 \$1,347.50

Quantity Subtotal

**Subtotal** \$96,562.00

255.4

Expenses Total 2,214.13

Hours Total 308.8

**Services Total** \$107,112.50

Total \$109,326.63

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 75252
ABA # 113024164 Account # 30081159

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

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

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

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

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# EXHIBIT C

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8111 Preston Road, Suite 300 Dallas, Texas 75225

Telephone: 214-327-5000 Fax: 214-327-5001 **INVOICE** 

Invoice # 34996 Date: 04/28/2023

#### Barton Receivership

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

Date	Initials	Description	Hours	Rate	Client Total
01/05/2023	CCK	Final edits to response and motion for leave; review lengthy letter from Kirby counsel regarding their proposal for lifting the stay and respond briefly to same; further review of correspondence from Rice LLC requesting confirmation that sale contract is terminated and confer with C. Thomas regarding same; call with C. Thomas regarding ; email S. Latham regarding email exchange with T. Wells regarding ; extensive research regarding ; brief conference with C. Thomas regarding same; email counsel for QuickBooks regarding continued unsuccessful efforts to obtain access to all accounts.	5.60	\$385.00	\$2,156.00
01/05/2023	SRL	Research  ; research  ; review corrected letter and correspondence from Wells Fargo on JMJ accounts closed in August 2021; review document production from Regions Bank; update bank production chart accordingly.	1.20	\$110.00	\$132.00
01/06/2023	CCK	Continue review of pleadings, attorney summary and communications with plaintiffs counsel regarding Sommerset-Lost Creek Golf Course case, in furtherance of settlement discussions; review order from 5th COA granting leave to file as an amicus; call with C. Thomas to discuss	3.40	\$385.00	\$1,309.00

		; review list of payments HNGH received from Barton/entities.			
01/06/2023	SRL	Review recent correspondence from banks and update chart accordingly.	0.40	\$110.00	\$44.00
01/09/2023	SRL	Review additional correspondence regarding various bank accounts and records.	0.70	\$110.00	\$77.00
01/09/2023	CCK	Confer with C. Thomas regarding  ; call SEC to confer regarding motion to dismiss 2 appeals; meet with counsel for HNGH; confer with C. Thomas  ; confer with C. Thomas regarding  ; review email from legal counsel for Intuit regarding QuickBooks access; email order denying motion to stay to title company and request willingness to close.	2.40	\$385.00	\$924.00
01/10/2023	CCK	Email US Trustee Northern District regarding status of discussions with HGNH; review Barton's Reply ISO motion to stay DLP settlement and review cases cited in same; review Notice of No Objection from Barton regarding Frisco sale and confer with C. Thomas regarding addressing same; review and revise draft letter to counsel inquiring about the source of their fees; continue drafting Motion to Show Cause; email counsel for golf course discussing settlement; review C. Thomas' email regarding  [ review bank summary and prior communications regarding Chase; confer with T. Wells regarding  [ review summary from T. Wells regarding ; confer with C. Thomas regarding ]	3.10	\$385.00	\$1,193.50
01/10/2023	SRL	Review Barton entity EIN information to audit EIN information provided to banks.	2.30	\$110.00	\$253.00

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01/11/2023	SRL	Research ; review summary of payments made by J. Guenley to K. Walji; review status of lawsuits filed by J. Dowdall against T. Barton and Barton entities.	0.90	\$110.00	\$99.00
01/12/2023	SRL	Review bank productions to determine payments, wire transfers, and other transactions involving K. Walji and J. Guenley; prepare chronology of same.	5.00	\$110.00	\$550.00
01/13/2023	SRL	Complete review of bank productions for wire transfers involving J. Guenely and K. Walji; prepare master chart of bank accounts.	3.30	\$110.00	\$363.00
01/13/2023	TBW	Finish revising Fifth Circuit motion to Appear as Appellee or Interested Party.	2.40	\$200.00	\$480.00
01/16/2023	SRL	Continue review of bank productions.	1.10	\$110.00	\$121.00
01/16/2023	TBW	Respond to email from C. Dannis regarding property appraisals; review Dallas water bills for receivership entities and calendar due dates; continue reviewing stayed litigation cases and drafting summaries regarding current disposition of case. [Rate reduced by half for extensive case research for Quarterly Report.]	7.70	\$100.00	\$770.00
01/17/2023	SRL	Complete review of bank productions and master chart regarding same; prepare summary of production deficiencies.	2.80	\$110.00	\$308.00
01/18/2023	SRL	Review Chase bank production for monthly statements for Barton entity D4OP, LLC.	0.80	\$110.00	\$88.00
01/18/2023	CCK	Review C. Thomas edits to Motion to Compel and further revisions to same; confer with assistant regarding ; substantial edits to motion for recognition as appellee regarding Rock Creek appeal; confer with T. Wells regarding ; review and respond to email from lender on Venus property requesting call; review T. Wells research ; confer with C. Thomas regarding ; review appellate rules regarding amicus briefs and participation in motion practice by amicus; revise motion to intervene/request for designation as appellee in the Rock Creek Appeal and confer with T. Wells regarding ; review additional	6.60	\$385.00	\$2,541.00

		research received from T. Wells regarding ; confer with C. Thomas regarding			
01/19/2023	SRL	Review Master Bank Chart to determine deficiencies in bank productions and draft letters to banks requesting additional information and records on Receivership Entities.	2.20	\$110.00	\$242.00
01/20/2023	SRL	Review Veritex Bank's response for accounts owned by D4OP, LLC; prepare correspondence banks transmitting supplemental Receiver Orders and request for additional account information.	2.40	\$110.00	\$264.00
01/20/2023	TBW	Correspondence with Receiver  (.2); review and revise letter to First State  Bank (.2); correspondence with NVC regarding  appraisals and needed information (.3); review  (.1);  prepare and participate in call with counsel for  Pioneer Finance regarding Venus, TX land (.4);  review appraisal on LDG001 land in Venus (.2)  draft email to Receiver about  (.2); correspondence with M.  Griswell regarding Opelika apartments and  outstanding invoices (.5); correspondence with  counsel for Third Coast Bank regarding additional  receivership entity accounts (.6); revise draft of  Notice of Sale for Frisco Gate (1.5);  correspondence with C. Koons regarding  electronics at 2999 Turtle Creek (.1);  correspondence with Childress Engineers regarding  Ridgeview Addition (.1).	4.40	\$200.00	\$880.00
01/20/2023	TBW	Revise motion to dismiss Rock Creek Appeal (3.3); review Federal Rules of Appellate Procedure for requirement to file as Amici (.4); correspondence with C. Koonce regarding same (.2).	3.90	\$200.00	\$780.00
01/23/2023	CCK	Review and revise first quarterly fee application [no charge]; confer with C. Thomas regarding ; review and revise notice of publication regarding Frisco property; confer with C. Thomas regarding	1.20	\$385.00	\$462.00

01/23/2023	SRL	Finalize correspondence to Bank of America and JP Morgan Chase Bank regarding supplemental request for information on accounts owned by Receivership Entities; emails with E. Moeller at Bank of America and H. Garcia at JP Morgan Chase bank regarding same; telephone call and emails with J. McPherson at First State Bank regarding no accounts; research alternate First State Bank locations.	0.90	\$110.00	\$99.00
01/23/2023	CAC	Meet with Receiver regarding 2999 Turtle Creek issues; begin analyzing bankruptcy and district court docket filings and orders in connection with same and HNGH.	2.40	\$300.00	\$720.00
01/24/2023	CCK	Respond to inquiry from Southern Star Capital, lender on Venus properties; additional research ISO demand for origin of funds to Barton's counsel and revise letter; confer with C. Thomas regarding ; draft letter to M. Barton's counsel regarding Gillespie Villas, reviewing docket for information regarding orders and interlocutory appeal; confer with T. Wells regarding ; confer with C. Thomas regarding ; confer with C. Thomas regarding	1.90	\$385.00	\$731.50
01/24/2023	SRL	Research Johnson County Real Property Records to determine status of any pending foreclosures; research case files to prepare chart of Receivership Entities addresses to send to banks for asset location.	3.60	\$110.00	\$396.00
01/24/2023	CAC	Continue reviewing bankruptcy court docket filings and orders in connection with 2999 Turtle Creek; continue analyzing issues regarding same; meet with Receiver to strategize and discuss same.	2.80	\$300.00	\$840.00
01/24/2023	TBW	Call with R. Jones regarding buyer for 2999 Turtle Creek (.1); correspondence with counsel for Merrill Lynch regarding updates; correspondence with counsel for Texas Brand Bank regarding additional account statements and wire transfer details (.5); correspondence with S. Latham regarding chart for property taxes (.1); correspondence with S. Latham	2.20	\$200.00	\$440.00

		regarding First State Bank and research on First State Bank (.3); review production from Vista Bank and Texas Brand Bank for information regarding Goldmark payroll history in preparation for tax filings (.3); correspondence with counsel for Bank of America regarding letter for more information (.3); review mail (.6).			
01/25/2023	SRL	Prepare and transmit correspondence to First State Bank Shallowater Dallas Branch requesting information on accounts owned by Receivership Entities; prepare and transmit supplemental requests for information on accounts owned by Receivership Entities to Veritex Bank, Vista Bank, Texas Republic Bank, and Wells Fargo Bank.	1.30	\$110.00	\$143.00
01/25/2023	CAC	Continue analyzing bankruptcy court docket filings and orders regarding 2999 Turtle Creek; draft summary of analysis regarding same; review case law in connection with same; meet with Receiver regarding same.	4.10	\$300.00	\$1,230.00
01/26/2023	CAC	Conduct analysis regarding value of 2999 Turtle Creek; draft summary of same; meet with Receiver regarding same; meet with C. Koonce regarding same.	3.10	\$300.00	\$930.00
01/26/2023	SRL	Revise, finalize and transmit supplemental letters to Texas Republic Bank, Veritex Community Bank, Vista Bank, and Wells Fargo Bank for request for additional information on accounts owned by Receivership Entities; review responses from Wells Fargo and Texas Republic Bank.	0.90	\$110.00	\$99.00
01/27/2023	CAC	Conduct research and review docket filings regarding 2999 Turtle Creek in connection with Receiver's drafting of quarterly report; correspondence with Receiver regarding same.	1.40	\$300.00	\$420.00
01/27/2023	SRL	Receive and review correspondence from Texas Republic Bank.	0.20	\$110.00	\$22.00
01/30/2023	CCK	Confer with T. Wells regarding ; continue edits to motion regarding same; further conference with counsel for S. Bedoya regarding scheduling a call to discuss where and how to obtain information necessary to prepare W-2s; confer with C. Thomas regarding ; review	4.80	\$385.00	\$1,848.00

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and revise Receiver's second status report and confer with C. Thomas regarding same; review and revise order ISO motion to confirm Lumar Land settlement is not subject to §2001; brief review of agreements burdening the Gate property.			
Correspondence with J. Silvasan regarding paychecks (.2); write paychecks for Amerigold Suites and scan copies (.5); correspondence with counsel for Pioneer Finance regarding Pioneer's proposal (.8); correspondence with C. Koonce regarding same (.2); review Frisco Notice prior to filing (.2); correspondence with C. Koonce (.3); draft conference email for motion for declaration on settlement agreements (.5); review and revise motion for declaration on settlement agreements (.7); revise Lumar Land agreement (.4); correspondence with C. Koonce regarding same (.2); correspondence with counsel for Lumar Land (.3); correspondence with counsel for Texas Brand Bank (.1); review wire transfer details from Texas Brand (.3); correspondence with counsel for Merrill Lynch regarding wire transfers (.2); correspondence with Receiver regarding (.2); revise propose order for motion on settlement agreements (.2); review information from A. Carrillo regarding (.4); correspondence with counsel for Third Coast Bank (.1); correspondence with K. O'Rourke regarding Third Coast production (.1); briefly review production from Third Coast (.2); call with DWU to pay Turtle Creek water bill (.2).	6.10	\$200.00	\$1,220.00
Conduct research and review docket filings regarding 2999 Turtle Creek in connection with 2999TC bankruptcy and HNGH dispute; correspondence with Receiver regarding same.	2.20	\$300.00	\$660.00
Conduct research regarding open bankruptcy issues in connection with 2999 Turtle Creek; draft summary of same; draft analysis in connection with same; circulate summary and analysis to Receiver; confer with Receiver regarding same.	3.40	\$300.00	\$1,020.00
Review filings and contracts related to Frisco property in preparation for hearing and confer with C. Thomas regarding  confer with assistant regarding setting on Wall Bankruptcies; confer	2.20	\$385.00	\$847.00
AC AC	confer with C. Thomas regarding same; review and revise order ISO motion to confirm Lumar Land settlement is not subject to \$2001; brief review of agreements burdening the Gate property.  3W Correspondence with J. Silvasan regarding paychecks (.2); write paychecks for Amerigold Suites and scan copies (.5); correspondence with counsel for Pioneer Finance regarding Pioneer's proposal (.8); correspondence with C. Koonce regarding same (.2); review Frisco Notice prior to filing (.2); correspondence with C. Koonce (.3); draft conference email for motion for declaration on settlement agreements (.5); review and revise motion for declaration on settlement agreements (.7); revise Lumar Land agreement (.4); correspondence with counsel for Lumar Land (.3); correspondence with counsel for Texas Brand Bank (.1); review wire transfer details from Texas Brand (.3); correspondence with counsel for Merrill Lynch regarding wire transfers (.2); correspondence with Receiver regarding (.4); correspondence with counsel for motion on settlement agreements (.2); review information from A. Carrillo regarding (.4); correspondence with K. O'Rourke regarding Third Coast production (.1); briefly review production from Third Coast (.2); call with DWU to pay Turtle Creek water bill (.2).  AC Conduct research and review docket filings regarding 2999 Turtle Creek in connection with 2999TC bankruptcy and HNGH dispute; correspondence with Receiver regarding same.  AC Conduct research regarding open bankruptcy issues in connection with 2999 Turtle Creek; draft summary of same; draft analysis in connection with same; circulate summary and analysis to Receiver; confer with Receiver regarding same.  CK Review filings and contracts related to Frisco property in preparation for hearing and confer with C. Thomas regarding	confer with C. Thomas regarding same; review and revise order ISO motion to confirm Lumar Land settlement is not subject to \$2001; brief review of agreements burdening the Gate property.  3W Correspondence with J. Silvasan regarding paychecks (.2); write paychecks for Amerigold Suites and scan copies (.5); correspondence with counsel for Pioneer Finance regarding Pioneer's proposal (.8); correspondence with C. Koonce regarding same (.2); review Frisco Notice prior to filing (.2); correspondence with C. Koonce (.3); draft conference email for motion for declaration on settlement agreements (.5); review and revise motion for declaration on settlement agreements (.7); revise Lumar Land agreement (.4); correspondence with C. Koonce regarding same (.2); correspondence with counsel for Lumar Land (.3); correspondence with counsel for Herrill Lynch regarding wire transfer details from Texas Brand (.3); correspondence with counsel for Merrill Lynch regarding wire transfers (.2); correspondence with Receiver regarding (.2); correspondence with counsel for Mortill tynch regarding wire transfers (.2); correspondence with C. Rovoucke regarding Third Coast production (.1); briefly review production from Third Coast (.2); call with DWU to pay Turtle Creek water bill (.2).  AC Conduct research and review docket filings regarding 2999 Turtle Creek in connection with 2999TC bankruptcy and HNGH dispute; correspondence with Receiver regarding same.  AC Conduct research regarding open bankruptcy issues in connection with 2999 Turtle Creek; draft summary of same; draft analysis in connection with same; circulate summary and analysis to Receiver; confer with Receiver regarding same.  CK Review filings and contracts related to Frisco property in preparation for hearing and confer with C. Thomas regarding	confer with C. Thomas regarding same; review and revise order ISO motion to confirm Lumar Land settlement is not subject to §2001; brief review of agreements burdening the Gate property.  Correspondence with J. Silvasan regarding paychecks (.2); write paychecks for Amerigold Suites and scan copies (.5); correspondence with counsel for Pioneer Finance regarding Pioneer's proposal (.8); correspondence with C. Koonce regarding same (.2); review Frisco Notice prior to filing (.2); correspondence with C. Koonce (.3); draft conference email for motion for declaration on settlement agreements (.5); review and revise motion for declaration on settlement agreements (.7); revise Lumar Land agreement (.4); correspondence with C. Koonce regarding same (.2); correspondence with counsel for Lumar Land (.3); correspondence with counsel for Lumar Land (.3); correspondence with counsel for Texas Brand Bank (.1); review wire transfer details from Texas Brand (.3); correspondence with counsel for Merrill Lynch regarding wire transfers (.2); correspondence with Receiver regarding (.2); revise propose order for motion on settlement agreements (.2); review information from A. Carrillo regarding (.2); review information from A. Carrillo regarding (.4); correspondence with C. Orourke regarding Third Coast production (.1); briefly review production from Third Coast (.2); call with DWU to pay Turtle Creek water bill (.2).  AC Conduct research and review docket filings regarding 2999 Turtle Creek water bill (.2).  AC Conduct research regarding open bankruptcy issues in connection with 2999 Turtle Creek; draft summary of same; draft analysis in connection with same; circulate summary and analysis to Receiver; confer with Receiver regarding same.  CK Review filings and contracts related to Frisco property in preparation for hearing and confer with C. Thomas regarding

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		with US Trustee for Eastern District regarding setting on motion to dismiss Wall Bankruptcies; review and respond to questions from T. Wells regarding ; review C. Thomas edits to motion for declaration and further edits to same; participate in hearing regarding approval of Frisco Gate sale; confer with C. Thomas afterward regarding same; call with S. Bedoya to discuss QB issues and information necessary to prepare W-2s and 1099s.			
01/31/2023	SRL	Receive and review supplemental production from Bank of America and update master bank chart accordingly.	0.80	\$110.00	\$88.00
01/31/2023	TBW	Review loan acceleration notice from Truist (.2); correspondence with Truist Bank regarding same (.4); call with T. Jones regarding Lost Creek Golf Course (.4); call with DWU to pay additional Turtle Creek water bill (.2); review bills coming due (.2); correspondence with Receiver about same (.1); review mail (.9); correspondence with C. Davis about mail received (.1); correspondence with C. Koonce regarding mail follow up (.2); correspondence with Receiver regarding (.2); correspondence with counsel for Third Coast Bank regarding account statements (.3); correspondence with Receiver and co-counsel regarding (.3); correspondence with counsel for Lumar Land regarding agreement (.2); review information from counsel for Bank of America (.3); correspondence with counsel for DLP Capital regarding bond (.3); correspondence with USI insurance (.2); review notes on Marine Creek bond and requirements to cancel (.3); review Third Coast Bank production (1.1); confer with Receiver and co-counsel regarding (.2) correspondence with S. Latham regarding bank account productions and miscellaneous items (.3).	6.40	\$200.00	\$1,280.00
02/01/2023	SRL	Receive and review supplemental production from Third Coast Bank; prepare deficiency chart of same to determine accounts for which monthly statements are still needed; review Capital One correspondence and master bank account chart and prepare supplemental letter to Capital One requesting additional information on accounts owned by Receivership Entities.	1.40	\$110.00	\$154.00
02/01/2023	TBW	Correspondence with M. Gill regarding Goldmark	6.90	\$200.00	\$1,380.00

		insurance (.4); correspondence with J. Halverson regarding Goldmark insurance (.4);  (1.1); correspondence with J. Medley regarding Third Coast production (.3); correspondence with DLP Capital regarding Marine Creek bond (.1); review bond information (.2); review Receiver's status report (.5); confer with Receiver regarding (.5); review executed Lumar Land agreement and prepare for filing (.4); correspondence with K. O'Rourke regarding filing motion (.2); review motion before filing (.1); correspondence with S. Latham regarding bank productions (.2); correspondence with counsel for Lumar Land regarding filing (.2);  (.3); review production from Third Coast Bank (.2); call with E. Espinosa regarding Marine Creek bond (.4); begin reviewing bank records (1.4).			
02/02/2023	SRL	Research MV9490 Management LLC as potential Receivership Entity; research Registered Agent information for Receivership Entities and compare information as shown on Texas Secretary of State website with list of Receivership Entities and EIN's.	2.10	\$110.00	\$231.00
02/02/2023	CAC	Continue conducting legal research regarding bankruptcy issues in connection with 2999 Turtle Creek; analyze findings regarding same; draft summary of same.	2.00	\$300.00	\$600.00
02/02/2023	TBW	Correspondence with J. Halverson regarding Goldmark insurance (.2); draft letter to counsel for capital one (.7); research MV9490 Management (.6); send statement received for M. Barton to counsel (.1) correspondence with C. Koonce regarding Gillespie (.1); review and revise draft letter to M. Barton attorneys (.2); correspondence with B. Forshey regarding Lumar status (.2); review information from S. Latham regarding entity search (.2); review bank records regarding payment to Republic Title (.2); draft letter to Jacobowitz and Gubits regarding invoice (.6); call with First Insurance Funding (.3); correspondence with Inspire Insurance (.1); correspondence with Receiver and co-counsel regarding (.2). [Rate reduced to \$100.]	3.70	\$200.00	\$740.00
02/02/2023	TBW	Continue reviewing bank records, creating chart of records, and associated research (2.6). [Rate	2.60	\$100.00	\$260.00

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		reduced to \$100.]			
02/03/2023	TBW	Review tax forms received for Receivership Entities and forward to accountants (.2); research Broward accountants (.2); correspondence with counsel for Merrill Lynch regarding status of entity (.1); review Dallas Water Utility invoice and correspondence with O'Rourke regarding payment (.2); review mail and associated research (1.1); correspondence with S. Latham regarding  (.1); correspondence with Inspire Insurance (.1); correspondence with Receiver and co-counsel regarding same (.2); pay Goldmark Spectrum bill (.2). [Rate reduced to \$100.]	2.40	\$200.00	\$480.00
02/03/2023	TBW	Continue reviewing bank records, creating chart, and associated research (5.2). [Rate reduced to \$100.]	5.20	\$100.00	\$520.00
02/06/2023	SRL	Receive and review supplemental production from Vista Bank; updated master bank chart accordingly.	0.70	\$110.00	\$77.00
02/06/2023	TBW	Review upcoming bill payments and compile invoices (.8); correspondence with C. Thomas and K. O'Rourke regarding checks for bills (.3); meeting and follow up correspondence with C. Thomas to discuss  (1.2); review Goldmark account and receivership account bank statements (.2); correspondence with K. O'Rourke regarding creation of spreadsheet to track expenses (.1); review T. Barton motion for extension of time (.1); correspondence with C. Baumli regarding insurance at 3600 Gillespie (.7); review insurance cancellation notice and review records regarding past payments (.4); correspondence with C. Thomas regarding same (.1); correspondence with M. Gill regarding insurance for 3600 Gillespie (.6); correspondence with C. Koonce regarding  (.1); correspondence with K. O'Rourke regarding same (.2); call with S. Latham to discuss status of bank requests (.2); correspondence with R. Chapple regarding Goldmark personal injury case (.5); review mail (.9); call with TXU regarding Goldmark (.3); correspondence with C. Thomas and S. Latham	7.10	\$200.00	\$1,420.00

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		regarding check images from bank (.2); draft email to M. Edney and T. Huffman regarding T. Barton life insurance policy (.2).			
02/07/2023	CAC	Meet with Receiver regarding	0.20	\$300.00	\$60.00
02/07/2023	TBW	Compile and send tax documents to receivership accountants (.2); pay Goldmark TXU bill (.2); review service of process notification for 2999 TC Acquisitions and correspondence with C. Thomas regarding same (.3); correspondence with counsel for Texas Brand Bank regarding production status (.1); correspondence with K. O'Rourke regarding creation of ledger to track payments from Receivership accounts (.2); review ledger and determine available funds (.2); correspondence with Wells Fargo regarding production of documents and payments to American Express (.3); review production from Third Coast Bank and email to counsel regarding additional information needed (.5); review production from Vista Bank and correspondence with bank regarding additional information needed (.7); correspondence with C. Thomas and C. Koonce regarding (.2); correspondence with Franklin Street Insurance regarding policy cancellation for SF Rock Creek (1.3); draft letter regarding process to retrieve personal property from Receivership Properties (1.2); review bank account chart to determine missing bank information (.4); correspondence with M. Gill and C. Thomas regarding insurance for 3600 Gillespie (.2); respond to emails from J. Dillion regarding status of 4107 Rock Creek (.2); review payments made to First Insurance Funding on 3600 Gillespie insurance policy and correspondence with First Insurance regarding same (.4); begin drafting motion to approve sale of Parc at Windmill Farms (.4).	6.80	\$200.00	\$1,360.00
02/08/2023	CCK	; call with K.  Bernstein regarding appellate issues; review docket in DLP appeal to determine briefing schedule and review FRAPs to determine response deadline for motion to dismiss; begin review and revisions to motion to dismiss DLP review; review briefing schedule for Max Barton appeal and research	1.80	\$385.00	\$693.00

		regarding interlocutory jurisdiction for same.			
02/08/2023	TBW	Revise Motion to Appear as Appellee, Interested Party, or Intervene, and Motion to Dismiss DLP Capital appeal (5.6); call with counsel for Merrill Lynch regarding updates on tracking wire transfers (.3); call with IRS regarding Dallas Real Estate Investors tax returns (.2); correspondence with counsel for Capital One regarding locating accounts (.4); research M. Barton appeal of supplemental receivership order (.3); respond to email from First Insurance Funding (.1); correspondence with M. Gill regarding insurance for Gillespie (.1); correspondence with C. Thomas regarding meeting and Gillespie insurance status (.1).	7.10	\$200.00	\$1,420.00
02/09/2023	CAC	Conduct research regarding open bankruptcy issues in connection with 2999 Turtle Creek.	0.70	\$300.00	\$210.00
02/09/2023	TBW	(.8); review mail (.6); look up case number to ensure Receiver's stay has been filed in response to notice of hearing for dismissal (.2); review correspondence from Wells Fargo against records and draft email regarding follow up questions (.4); review Seagoville Farms status (.5); call with A. Baker regarding potentially purchasing receivership properties (.6); correspondence with C. Thomas regarding same (.1); call with counsel for Texas Brand Bank (.3); correspondence with M. Gill and Receiver regarding insurance for Gillespie (.4); review and complete form for same (.4); correspondence with Franklin Street regarding SF Rock Creek insurance (.1); correspondence with counsel for First Insurance Funding regarding premium refund (.2); review additional production from Third Coast Bank (.3); correspondence with S. Latham regarding same (.1); correspondence with C. Thomas and C. Koonce regarding Porsche SUV (.4); review and revise draft of personal property letter (.4); review and revise Receivers motion to dismiss and motion to intervene in the DLP Capital appeal (.8); briefly review SEC Appellee brief (.6).	7.20	\$200.00	\$1,440.00
02/10/2023	ССК	Review HNGN's supplement to motion to intervene; call with C. Thomas to discuss	4.80	\$385.00	\$1,848.00

		; email two accountants who did not respond to letters requesting documents and information; respond to email from counsel for lender on Amerigold Suites; email counsel for M Barton regarding coordinating his move out and getting keys to Gillespie Villas; draft letter to Max's counsel regarding origin of fees; confer with team regarding  ; review documents and information provided by lienholder on property previously owned by Wall09 but transferred by Barton to Lynco; respond to same and forward chain of title and Lynco docs to C. Thomas; continue drafting motion to compel regarding attorney's fees information and confer with C. Thomas regarding same; review order regarding mediation with HN Capital.			
02/10/2023	CAC	Continue researching bankruptcy court dockets regarding 2999 Turtle Creek; analyze open issues regarding same; meet with Receiver regarding same.	1.90	\$300.00	\$570.00
02/10/2023	SRL	Receive and review supplemental productions from Third Coast Bank and Texas Brand Bank and update master chart accordingly.	1.00	\$110.00	\$110.00
02/10/2023	TBW	Briefly review HNGH Turtle Creek's motion to intervene (.4); review and complete insurance supplement for Gillespie (.3); correspondence with K. Williams regarding receivership properties (.1); correspondence with M. Gill regarding insurance (.2); make insurance payment for Gillespie (.1); meeting with C. Thomas and C. Koonce to discuss (.8); correspondence with accountants regarding tax documents (.1); respond to email from A. Baker regarding receivership properties (.1); call with Bees Keys regarding fire safe at 2999 Turtle Creek (.2); correspondence with C. Thomas regarding same (.1); continue revising motion to approve sale of Parc at Windmill Farms (2.2); pay 2999 Turtle Creek TXU bill (.2); call with S. Ramer regarding 3600 Gillespie (.1); correspondence with C. Thomas and C. Koonce regarding same (.2); travel to 3600 Gillespie to secure property (1.1).	6.20	\$200.00	\$1,240.00
02/12/2023	TBW	Review HUD regulatory agreement and note for Windmill Farms; finish revising Motion to Approve Sale of the Parc at Windmill Farms.	2.70	\$200.00	\$540.00

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0.10	\$110.00	\$11.00
6.50	\$200.00	\$1,300.00
6.70	\$385.00	\$2,579.50
6.60	\$200.00	\$1,320.00
	6.70	6.70 \$385.00

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	(1.2); review BM318 counterclaims and other associated pleadings (.8); call with B. Owens regarding Ridgeview Addition (.3); correspondence with Receiver and C. Koonce regarding same (.3); correspondence with Franklin Street regarding reinstating insurance for 4107 Rock Creek (.6); respond to email from counsel for Pate Jones regarding Ridgeview Addition lien (.2); correspondence with counsel for Lumar Land regarding deeds of trust (.4); review letter form M. Edney regarding quick books (.2); correspondence with Bees Keys regarding safe at Turtle Creek (.3); review and organize documents from Turtle Creek (.9).			
02/15/2023 CCK	Confer with C. Thomas regarding  continued edits to same; review and respond to email from counsel for construction service on Opelika, including lien information; review and respond to emails from lienholder regarding airplane; email J. Lindauer requesting litigation file for BM318; call counsel for Dixon regarding proposal moving forward; continue drafting Motion to Compel documents evidencing origin of attorney's fees paid to Barton's counsel; review prior summary related to  ; draft lengthy email to A. Carrillo regarding  ; return email from counsel for Dixon regarding scheduling call; review letter from M. Edney regarding privilege protocol; research regarding privilege issues and establishing protocol; lengthy conference with C. Thomas regarding  ; email two accountants who have failed to respond to requests for information.	5.60	\$385.00	\$2,156.00
02/15/2023 CAC	Review BM318 bankruptcy docket filings and notes to determine strategy and next steps.	0.40	\$300.00	\$120.00
02/15/2023 SRL	Prepare correspondence to Texas Bank and Happy State Bank regarding accounts owned by Receivership Entities; update master bank chart and master spreadsheet.	1.10	\$110.00	\$121.00
02/15/2023 TBW	Review and revise Lumar agreement reply brief (1.1); correspondence with S. Latham regarding updates from bank requests and coordinating	7.20	\$200.00	\$1,440.00

		records requests (.5); review Chase Bank records for missing documents (.5); call with H. Garcia regarding Chase Bank production (.3); correspondence with First State Bank and review of associated records (.7); reconcile bank list from Turtle Creek with master bank list (.4); correspondence with potential buyers of receivership property (.7); correspondence with Receiver regarding same (.2); correspondence with L. Swanson regarding Wells Fargo documents request (.7); review Happy State Bank production records (.3); correspondence with Riner Engineering regarding past due invoices (.2); review files for survey of 2999Turtle Creek (.2); scan documents and miscellaneous organization (.3); send tax documents to receivership accountants (.1); review T. Barton notice of opposition to fee application (.2); review letter from M. Edney regarding privilege protocol (.3); correspondence with K O'Rourke regarding addition to creditor list (.1); call with T. Jones regarding Lost Creek (.2); review records regarding Texas Bank (.2).			
02/16/2023	CCK	Continued review of accountant information for Dallas Consulting Services and revise letter to same; continued research regarding  ; call with counsel for Dixon Water Foundation; review letter from M. Edney addressing several issues raised in pending motion to compel and begin drafting Reply ISO same, addressing contentions from correspondence; review and revise motion for appointment of appraisers, etc., regarding Windmill Farms.	4.80	\$385.00	\$1,848.00
02/16/2023	SRL	Emails with L. Cox at Happy State Bank regarding supplemental orders and request for additional search on Receivership Entities; finalize and transmit letter to Texas Bank regarding Receiver Order and search for accounts owned by Receivership Entities; receive and review production from Texas Republic Bank and update master chart accordingly; review additional bank records and confirm inclusion on master bank account chart.	1.60	\$110.00	\$176.00
02/17/2023	TBW	Review information on Lost Creek litigation and receivership aircraft in preparation for meeting with Receiver (.5); meeting with C. Thomas and C.	6.60	\$200.00	\$1,320.00

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		(.6); correspondence with counsel for Happy State Bank and review records (.8); review production provided from same (.2); correspondence with Chase Bank regarding document production (.4); review Chase production chart (.2); correspondence with S. Latham regarding updates from banks (.2); briefly review response to motion to compel documents (.6); draft letter to G. Werley regarding Lost Creek golf course (1.8); call with T. Huffman (.1); scan and organize documents (.3); confer with Receiver regarding same (.1); review meeting notes from Receiver (.2); review letter from M. Edney regarding Rock Creek appeal (.1); correspondence with Franklin Street regarding reinstating Rock Creek insurance (.2); research Assured Partners and attempt to contact (.3).			
02/19/2023	CCK	Review Edney correspondence regarding Rock Creek Sale and confer with C. Thomas regarding ; research regarding ; review and revise letter to counsel for owner of golf course regarding potential.	1.40	\$385.00	\$539.00
02/20/2023	CCK	Confer with counsel for new owner of lien on Amerigold regarding call; confer with T. Wells regarding ; confer with T. Wells regarding ; review T. Wells' research and continue same.	1.00	\$385.00	\$385.00
02/20/2023	TBW	Review Lost Creek litigation pleadings to verify amount at issue and claims (.7); revise letter to G. Werley (.2); confer with C. Koonce regarding same (.1); correspondence with Franklin Street regarding Rock Creek insurance (.1); review Tesla records, research contact information, and revise letter (.9); review documents regarding Dallas Consulting Services and Quickbooks and research contacts (.8); review research (.1); briefly review finings from Veracity (.1); research regarding (3.8); confer with C. Koonce regarding same (.2); correspondence with counsel for Capital	7.50	\$200.00	\$1,500.00

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		One regarding accounts and review of records (.3); correspondence with Truist regarding vehicle loan (.2).			
02/21/2023	CCK	Draft response to Edney letter regarding status of Rock Creek sale; continued research regarding; continue drafting Reply ISO motion to compel; call with new owner of note on Amerigold; brief review of certain pieces of mail; call with C. Thomas regarding  ; confer with T. Wells regarding ; continue drafting Reply ISO motion to compel documents and information.	6.70	\$385.00	\$2,579.50
02/21/2023	CAC	Meet with Receiver regarding mediation statement to be drafted for Judge Hale; review mediation statement precedent in connection with same; begin drafting same.	1.10	\$300.00	\$330.00
02/21/2023	TBW	Research files and records for Quickbooks information (.3); correspondence with Receiver regarding same (.1) correspondence and payment to Franklin Street regarding Rock Creek insurance (.4); correspondence with V. Barton regarding personal property (.2); review records regarding same (.3); calls with T. Huffman (.2); correspondence with Receiver and C. Koonce regarding (.2); revise motion for Parc at Windmill Farms and review associated purchase and sale agreement and HUD agreements (2.1); review research request from C. Koonce and confer regarding same (.1); begin motion to approve sale of Bellwether Ridge (1.8); call with First State Bank (.1); call with counsel for Texas bank (.2).	6.40	\$200.00	\$1,280.00
02/22/2023	TBW	Continue motion to approve sale of Bellwether Ridge (1.4); create proposed orders for Windmill Farms and Bellwether (.6); correspondence with T. Huffman (.2); review and revise motions to approve and appendixes for Bellwether and Windmill Farms (4.3); correspondence with property mangers for Bellwether and Windmill Farms regarding requests for documents (.4); compile list of upcoming Amerigold expenses for Receiver (.4); correspondence with C. Koonce regarding (.2); correspondence with First State Bank (.1); correspondence with S. Latham regarding same (.1).	7.70	\$200.00	\$1,540.00

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02/23/2023	SRL	Prepare Notice of Lis Pendens for Tarrant County property in Somerset-Lost Creek Golf, Ltd matter.	0.60	\$110.00	\$66.00
02/23/2023	TBW	Review mail (.4); confer with C. Koonce regarding same (.1); research  (5.8); review response form G. Werely regarding Lost creek (.2); research Tarrant County property records (.3); revise draft of lis pendens for Lost Creek golf course (.5); correspondence with counsel for Circle H regarding Ridgeview Addition (.2); correspondence with K. O'Rourke regarding Goldmark payments (.1); email to counsel for Pate Jones (.1); correspondence with property managers for Bellwether and Windmill Farms (.1).	7.80	\$200.00	\$1,560.00
02/24/2023	CAC	Draft mediation statement for 2999 Turtle Creek mediation on March 10.	1.80	\$300.00	\$540.00
02/24/2023	SRL	Finalize and file Notice of Lis Pendens in Tarrant County.	0.30	\$110.00	\$33.00
02/24/2023	TBW	Correspondence with K. O'Rourke regarding meeting with Circle H (.1); research on privilege for information versus documents (.5); correspondence with property managers for Bellwether and Windmill Farms regarding additional documents (.2); Review Atmos Energy statements and confer with Receiver regarding same (.5); call with Atmos Energy to pay invoices (.3); review and organize documents retrieved from same (.9); download and organize documents for Bellwether Ridge (.3); finalize lis pendens for Lost Creek (.4); correspondence with S. Latham regarding same (.2); set up Amerigold file transfer portal (.2); draft email to First Insurance regarding premium refund for Gillespie Villas (.3); review production from Texas Brand Bank to determine missing information (.4); correspondence with Receiver regarding	4.40	\$200.00	\$880.00
02/24/2023	TBW	Travel to Turtle Creek to look for QuickBooks information and additional documents (3.2). [Rate reduced to \$100.]	3.20	\$100.00	\$320.00
02/26/2023	CAC	Begin drafting mediation statement for 2999 Turtle Creek dispute; conduct research regarding same; draft analysis in connection with same.	2.50	\$300.00	\$750.00
02/27/2023	CAC	Continue drafting mediation statement regarding 2999 Turtle Creek.	3.70	\$300.00	\$1,110.00

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02/27/2023	SRL	Receive and review supplemental document production from First State Bank in Shallowater; update bank chart.	0.40	\$110.00	\$44.00
02/27/2023	TBW	Correspondence with counsel for Pate Jones regarding Ridgeview Addition (.3); revise letter to TXU collection agent (.5); correspondence with Assured Partners regarding Seagoville (.8); research regarding Seagoville Farms (.9); correspondence with Texas Workforce Commission (.3); correspondence with Lipscomb Insurance regarding Rock Creek (.6); revise letter to Tennessee Department of Revenue (.5); pay Goldmark insurance (.2); review Capital One Statements (.3); correspondence with counsel for Capital One (.3); correspondence with property manager for Windmill Farms (.1); download and organize documents for Windmill Farms (.3); compile and send documents to receivership accountants (.2); begin preparing motion for approval of Amerigold Suites (1.3); correspondence with counsel for Texas Bank (.4); correspondence with Receiver regarding (.1).	7.10	\$200.00	\$1,420.00
02/28/2023	CAC	Continue drafting 2999 Turtle Creek mediation statement.	5.70	\$300.00	\$1,710.00
02/28/2023	TBW	Prepare for call with counsel for Pate Jones (.3); participate in same (.6); finish preparing motion approving sale of Amerigold Suites (2.8); prepare proposed order for same (.4); gather documents for appendix to Amerigold motion and correspondence with K. O'Rourke about creating appendix (.4); review bank records for commingling of funds between SF Rock Creek and other Receivership Entities (1.6); create summary of same (.3); correspondence with Receiver and C. Koonce regarding same (.2); correspondence with S. Latham regarding Chase Bank production (.1); review Johnson County deed records (.4).	7.10	\$200.00	\$1,420.00
03/01/2023	CAC	Continue drafting mediation statement for 2999 Turtle Creek dispute.	2.30	\$300.00	\$690.00
03/01/2023	TBW	Review payroll for Amerigold and correspondence with K. O'Rourke regarding checks (.2); correspondence with Receiver and C. Koonce regarding (.1); revise motion to approve sale of Amerigold Suites (1.7); prepare for call with Circle H (.2);	5.60	\$200.00	\$1,120.00

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		participate in same (.6); respond to email from First Insurance Funding (.1); research current counsel for M. Fu and S. Wall (.3); prepare and send conference email regarding Amerigold Motion (.5); review letter from S. Ramer regarding M. Barton personal property (.2); correspondence with Receiver regarding same (.1); correspondence with counsel for Pate Jones (.2); review docket in Pate Jones v. Ridgeview (.3); revise Receiver's notice of stay to file in same (.7); correspondence with Receiver regarding (.1); correspondence with J. Silvasan regarding Amerigold rent roll (.1); upload Amerigold due diligence documents (.2).			
03/02/2023	CCK	Confer with C. Thomas regarding  ; research same and email C. Thomas regarding same; review T. Wells edits to motion to appoint appraisers for Amerigold; confer regarding status of demands and requests for interviews from accountants; call with C. Thomas to discuss  ; meet with C. Thomas and A. Carrillo regarding  ; review order setting accelerated briefing schedule on 3 motions to approve sales.	2.10	\$385.00	\$808.50
03/02/2023	JJM	Review Purchase and Sale Agreement for 2999 Turtle Creek and deliver summary to C. Thomas.	0.90	\$275.00	\$247.50
03/02/2023	CAC	Conduct research for draft mediation statement regarding 2999 Turtle Creek; meet with C. Koonce and Receiver regarding mediation statement; analyze issues regarding same.	1.20	\$300.00	\$360.00
03/02/2023	TBW	Review mail (.3); correspondence with First Insurance Funding to pay Rock Creek Insurance (.2); review square account and transfer funds (.1); finalize motion to approve sale of Amerigold Suites (.7); correspondence with K. O'Rourke regarding filing same (.1); research F. Farooq (.4); prepare letter to same regarding accounting services to receivership entities (.6); review Johnson county lien records for deeds of trust related to Ridgeview Addition (.9); correspondence with S. Latham regarding same (.2); correspondence with Spirit Aeronautics regarding mistaken communication (.3); call with T. Swenson regarding insurance inspection for Gillespie Villas (.2); correspondence with receiver	7.30	\$200.00	\$1,460.00

		regarding same (.2); correspondence with DWU regarding billing (.3); review orders from court (.2); begin drafting response to S. Ramer regarding M. Barton personal property (2.4); correspondence with counsel for Louisiana National Bank regarding status of Hall Street property (.2);			
03/03/2023	CAC	Finalize mediation statement for 2999 Turtle Creek; meet with Receiver regarding same; submit same to Mediator.	3.90	\$300.00	\$1,170.00
03/03/2023	TBW	Finish drafting response to S. Ramer regarding M. Barton personal property (.7); briefly review T. Barton Notice of Intent to Move for Leave to File Sur-Reply (.2); briefly review T. Barton reply brief (.3); begin reviewing Ridgeview addition deeds of trust and associated documents and creating chronology chart (3.4); review and revise Turtle Creek payments chart (1.7); confer with A. Carrillo regarding same (.3); correspondence with J. Silvasan regarding Amerigold reports (.2); correspondence with Walker Dunlop regarding due diligence documents (.4); correspondence with Richardson ISD tax office (.1).	7.30	\$200.00	\$1,460.00
03/04/2023	TBW	Travel to Home Depot to buy new locks for Gillespie (.4); travel to Gillespie to change locks (1.5). [No charge]	1.90	\$0.00	\$0.00
03/06/2023	CCK	Review email from lender on Rock Creek, confer with C. Thomas regarding same and respond; confer with C. Thomas regarding  ; confer with C. Thomas and T. Wells regarding  ; review policy to evaluate notice and timing obligations; brief review of motion for continuance filed by southern properties and confer with C. Thomas regarding same; confer with T. Wells regarding	1.20	\$385.00	\$462.00
03/06/2023	SRL	Review document productions from Chase for D4OP LLC account statements and images.	0.40	\$110.00	\$44.00
03/06/2023	CAC	Call with Mediator, Receiver, and HNGH counsel regarding 2999 Turtle Creek mediation; meet with Receiver regarding same.	0.50	\$300.00	\$150.00
03/06/2023	TBW	Prepare list of upcoming bills for Amerigold (.3);	4.40	\$200.00	\$880.00

		correspondence with Receiver regarding same (.1); confer with Receiver and C. Koonce regarding  (.3); correspondence with M.  Gill regarding same (.4); review Amerigold insurance policy (.3); correspondence with K.  O'Rourke regarding checks (.1); correspondence with counsel for Texas Brand Bank regarding payment information (.5); review production from same (.1); correspondence with Capital One (.5); call with DWU regarding Amerigold bill (.2); correspondence with Dallas city attorney's office regarding DWU bill (.2); correspondence with Tesla regarding returning car (.3); correspondence with T. Swenson regarding Gillespie inspection (.2); pay Spectrum bill for Amerigold (.1); pay Amerigold TXU bill (.2); review mail (.6).			
03/07/2023	CAC	Conduct review of case documents and case law in preparation for mediation on 2999 Turtle Creek dispute; correspondence with Mediator regarding same; call with Receiver regarding same.	2.20	\$300.00	\$660.00
03/07/2023	CCK	Call with K. Bernstein regarding status of Rock Creek sale; confer with C. Thomas regarding same and provide amendment to Mr. Bernstein; further call with K. Bernstein regarding issues pertaining to Rock Creek appeal; review	0.50	\$385.00	\$192.50
03/07/2023	TBW	Prepare letters for Venus leaseholders (.5); review list of loan letters from small business administration, create list and compare list to supplemental order receivership entities (1.3); correspondence with small business administration regarding loans (.6); prepare letter to same (.5); correspondence with Receiver and C. Koonce regarding (.3); draft email to property managers for Bellwether Ridge and Windmill Farms requesting additional documents (.8); review bank records for payment to HNGH (.4); correspondence with Receiver regarding same (.2); revise and finalize response to M. Barton personal property letter (.6); correspondence with Capital One regarding records(.6); correspondence with A. Carrillo regarding (.1); correspondence with Z. Chenault about window repairs for Gillespie property (.3); review quote from same (.1); call to Richardson ISD tax office (.1); correspondence with Wells Fargo regarding	6.70	\$200.00	\$1,340.00

		document production (.3).			
03/08/2023	CAC	Conduct review of case documents and case law in preparation for 2999 Turtle Creek mediation.	4.20	\$300.00	\$1,260.00
03/08/2023	TBW	Confer with Receiver regarding file report from Veracity Forensics (.4); review T. Barton response to quarterly fee application (.3); correspondence with Receiver regarding window quote for Gillespie property (.1); correspondence with Z. Chenault regarding same (.2); review records for Goldmark payment history to Dallas Water utilities (.3); correspondence with Dallas Attorney's office regarding water bill for Goldmark (.2); review bank records for Parc at Ingleside bank statements (.7); correspondence with Capital One regarding documents request (.4); calls with Spectrum and Republic Services regarding service contracts (.6); compile due diligence records for Goldmark and add to Walker Dunlop Box drive (.9); correspondence with M. Taylor regarding same (.3); correspondence with counsel for S. Bedoya (.3); create list of entities not listed in orders as Receivership Entities (.6); review files for information on same (.5); correspondence with S. Latham regarding secretary of state search for control of entities (.2); correspondence with Terminix regarding bills and service contract (.3); correspondence with J. Silvasan regarding incident at Amerigold and service contracts (.4); call with director of Richardson ISD Tax office (.3); review files for Liberty Bankers records (.2); correspondence with counsel for Pate Jones in response to question about deeds of trust (.2); finalize letter to Small Business Administration (.1); correspondence with K O'Rourke regarding same (.1).		\$200.00	\$1,520.00
03/09/2023	CAC	Analyze case law in preparation for 2999 Turtle Creek mediation; review materials in connection with same; meet with Mediator regarding same; meet with Receiver and C. Koonce regarding same.	2.90	\$300.00	\$870.00
03/09/2023	SRL	Research regarding newly identified potential Receivership entities.	1.40	\$110.00	\$154.00
03/09/2023	CCK	Review summary of	2.50	\$385.00	\$962.50

		; participate in premediation call with Judge Hale; call with C.  Thomas and A. Carrillo to discuss  ; review and respond to email from lender on Rock Creek; confer with T. Wells regarding  ; further conference with C. Thomas regarding			
03/09/2023	TBW	Call with Z. Chenault to schedule window replacement for Gillespie (.1); begin reviewing and coding files from Veracity Forensics (1.5); confer with Receiver regarding findings (.2); determine file extensions to copy (.5); call with C. Koons regarding copying files (.2); review files for TC Hall closing documents and send same to Receiver (.4); pay TXU bill for 2999 Turtle Creek (.2); correspondence with J. Silvasan regarding paychecks for Amerigold (.1); gather payment amounts and correspondence with K. O'Rourke regarding checks (.2); review secretary of state files from S. Latham for evidence of entities being receivership entities (.8); research entities not found on Texas secretary of state (.3); correspondence with S. Latham regarding same (.1); review findings from Delaware secretary of state (.1); review files from Bellwether Ridge property managers (.4); correspondence with same regarding missing files (.1); review Dallas Housing authority form for Goldmark (.1); review letter from Microsoft and receivership order (.3); correspondence with C. Koonce regarding same (.2); confer with Receiver regarding (.2); send documents regarding same (.1).	6.10	\$200.00	\$1,220.00
03/10/2023	CAC	Represent Receiver at mediation on 2999 Turtle Creek.	7.40	\$300.00	\$2,220.00
03/10/2023	TBW	Add Republic Services contract to Walker Dunlop Box (.2); correspondence with counsel for Texas Brand Bank regarding information on account holders (.2); travel to Gillespie property to meet window repair company (.5); travel to 2999 Turtle Creek to retrieve documents (.5); return to office (.4); scan check stubs from HNGH payments and send to Receiver (.2); correspondence with buyer	4.70	\$200.00	\$940.00

		of Bellwether Ridge regarding requested documents (.1); complete Dallas Housing Authority form for Amerigold direct deposits (.2); revise non receivership entity list and add connections to T. Barton (1.1); correspondence with S. Latham and K. O'Rourke regarding EIN list for accountants (.3); review files for missing EINs (.3); correspondence with S. Latham regarding Wells Fargo production (.2); travel to Gillespie property to secure property and review work on windows (.5).			
03/12/2023	CCK	Review Response/Objections filed by Southern Properties and Barton, and draft summary regarding same; confer with T. Wells regarding ; begin drafting Response to Barton's objection; review notice of claim from law firm representing injured tenant at Amerigold and confer with T. Wells and C. Thomas regarding same; review messages from multiple interested/ prospective buyers and communicate with T. Wells and C. Thomas regarding same; review information on T. Barton's linked-in page regarding same and confer with C. Thomas regarding; review and respond to accountant's questions regarding tax returns, Form 56, and extensions, call with accountant regarding questions related to same; confer with S. Latham regarding certain entities and whether they are Barton-controlled; call with SEC regarding motion to intervene; research regarding; forward same to C. Thomas; call with C. Thomas regarding ; confer with T. Wells regarding; confer with T. Wells regarding soliciting offers for sales.	8.40	\$385.00	\$3,234.00
03/13/2023	SRL	Review document productions from JP Morgan Chase Bank and update master chart accordingly review IRS tax return extension requests for Receivership Entities and prepare list of entities not included in Receivership Orders.	3.30	\$110.00	\$363.00
03/13/2023	ССК	Call with C. Thomas and T. Wells to discuss ; continue drafting Reply to Barton Objection; review communications about	2.00	\$385.00	\$770.00

		QSF and tax return issues.			
03/13/2023	TBW	Confer with Receiver and C. Koonce regarding  (.8); correspondence with counsel for S. Bedoya (.1); review letter from Uvalle law firm to Goldmark (.2); correspondence with J. Silvasan regarding same (.2); briefly review motions and responses filed by T. Barton and Southern Properties Capital (.8); correspondence with interested buyers of Parc at Windmill Farms, Bellwether Ridge, and Amerigold Suites (2.8); correspondence with Receiver and C. Koonce regarding  (.5); correspondence with counsel for Third Coast Bank and owner of Elite Jet Solutions (.1); correspondence with with C. Goodwin regarding Venus lease (.3); correspondence with K. O'Rourke regarding same (.1); send notice of publication to C. Koonce (.2); begin reviewing bank records for D4DS and D4FR (.7); review Chase account for to determine if it is Receivership Entity (.2); correspondence with S. Latham regarding same (.1).	7.10	\$200.00	\$1,420.00
03/14/2023	CCK	Review and respond to email from interested buyer regarding hearing process for motion to approve sale; call with C. Thomas and T. Wells regarding ; begin drafting motion to stay hearing regarding apartment development sales; email accountant regarding tax/extension issues; confer with T. Wells regarding ; call with counsel for SPC regarding motion to continue hearing; call with SEC regarding same; draft motion to continue hearing and order; review C. Thomas edits to motion to compel/for sanctions from Hunton, and further edits to same.	4.70	\$385.00	\$1,809.50
03/14/2023	SRL	Research regarding ; assist M. Ahuga with outstanding issues regarding tax extensions for Receivership Entities.	0.40	\$110.00	\$44.00
03/14/2023	TBW	Confer with Receiver and C. Koonce regarding  (.8); review letters of intent from potential apartment buyer (.2); review Southern Properties contracts (1.2); correspondence with C. Koonce regarding same (.2); correspondence with Receiver regarding  (.4);	4.60	\$200.00	\$920.00

		correspondence with potential buyers of receivership properties (1.4); correspondence with property manager for Bellwether Ridge (.1); review Terminix bills for Amerigold and correspondence with K. O'Rourke regarding payments for same (.2); correspondence with counsel for Pate Jones regarding Venus deeds of trust (.1).			
03/15/2023	SRL	Continue review of voluminous document productions received from JP Morgan Chase Bank.	2.80	\$110.00	\$308.00
03/15/2023	CCK	Review C. Thomas edits to motion to continue, order, and Reply to Barton Objections; and further edits to motion to continue; email SEC counsel regarding conference on same; confer with accountants, S. Latham and T. Wells regarding tax issues related to certain entities, and further review/research regarding same; and forward information received from S. Bedoya's attorney regarding same; review new posts from Barton's linked in page and email his counsel regarding continuing interference; confer with T. Wells regarding  Review C. Thomas email regarding  ; review Barton motion for accelerated oral arguments in Fifth Circuit and order granting same; review SPC's response to motion for continuance; call with prospective purchaser and review emails from other bidders on apartment developments; multiple emails regarding tax extension issues.	5.40	\$385.00	\$2,079.00
03/15/2023	CAC	Analyze BM318 and Lumar dispute issues.	0.70	\$300.00	\$210.00
03/15/2023	TBW	Review and revise reply to Barton Response (1.3); correspondence with Receiver and C. Koonce regarding (.2); revise email to R. Douglas regarding apartment properties (.3); correspondence with same (.2); participate in call with R. Douglas and D. Valger regarding apartment properties (.3); multiple calls and additional correspondence with potential property buyers (2.4); correspondence with Walker Dunlop regarding providing information to interested buyer (.4); travel to Gillespie property to meet insurance inspector, travel to 2999 Turtle Creek to retrieve documents, return to office (1.4) review entity	9.40	\$200.00	\$1,880.00

	review Southern Properties response to Receiver's motion to continue (.2); review loan documents for Parc at Windmill Farms and Bellwether Ridge for entities implicated and review SEC appendix to receivership motion for entities connection to Wall investor funds and draft email to Receiver and C. Koonce regarding findings (1.2); review Hall Street closing documents for sale details (.4).			
03/16/2023 CCK	Review and respond to emails about accounting and comingling issues, begin drafting Reply to SPC objection; review settlement offer from Tamamoni and confer with T. Wells regarding same; confer with C. Thomas regarding ; review T. Wells edits and comments on Reply to Barton's objections and further revisions to same.	4.30	\$385.00	\$1,655.50
03/16/2023 CAC	Analyze issues regarding Lumar and BM318 dispute; review case documents and filings regarding same.	3.80	\$300.00	\$1,140.00
03/16/2023 TBW	Correspondence with interested property buyers (2.7); respond to Uvalle law firm regarding Amerigold (.4); revise reply in support of motion to sell Parc at Windmill Farms and Bellwether Ridge (1.6); correspondence with Receiver regarding (.3); correspondence with Walker Dunlop (.3); review Greystone loan documents for borrowers oath (1.2); review bank records for examples of commingling of funds (2.4); call with J. Silvasan regarding letter from Uvalle law (.2)	9.10	\$200.00	\$1,820.00
03/17/2023 CCK	Review and edit Reply regarding Barton objections to sale of Amerigold; review additional HUD docs regarding SPC transactions and confer with T. Wells and C. Thomas regarding same; confer with A. Carrillo regarding ; email SPC attorneys requesting Volume IV of their appendix.	0.90	\$385.00	\$346.50
03/17/2023 SRL	Review document productions from Happy State Bank, Third Coast Bank, Wells Fargo and continue review of voluminous production from JP Morgan Chase Bank.	2.10	\$110.00	\$231.00
03/17/2023 CAC	Analyze issues regarding Lumar dispute; review docket and filings for same; meet with C. Koonce regarding same.	1.60	\$300.00	\$480.00

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03/17/2023	TBW	Correspondence with Counsel for Tamamoi LLC and 3820 Illinois regarding Illinois property (.4); correspondence with potential property buyers (1.4); revise Receiver's reply to motion to sell apartments (.8); correspondence with Receiver and C. Koonce regarding (.3); correspondence with J. Silvasan regarding Amerigold rent rolls (.2); review HUD loan borrower oaths for Windmill Farms and Bellwether Ridge (.5); begin creating chart of Amerigold cashflow (1.1); attempt to contact Venus court (.3); correspondence with S. Latham regarding Wells Fargo production (.2).	5.20	\$200.00	\$1,040.00
03/19/2023	TBW	Finalize Amerigold cashflow chart.	0.90	\$200.00	\$180.00
03/20/2023	SRL	Research ownership and officer history for Goldmark Hospitality to assist in preparations for hearing on sale of properties; continue review of JP Morgan Chase Bank's supplemental production of bank statements with images.	2.70	\$110.00	\$297.00
03/20/2023	CCK	Review order granting fee petition; review and revise motion to compel documents from attorneys; review limited tracing info related to Goldmark and confer with T. Wells regarding same; review Motion to sell and begin drafting outline for same; confer with T. Wells and C. Thomas regarding ; confer with A. Carrillo regarding ; confer with T. Wells regarding ; confer with T. Wells regarding ; confer with T. Wells regarding ; draft outline for arguments regarding sale of Amerigold and continue preparation for same; travel to courthouse and argue same; confer with SEC regarding various issues; return to office; review certifications and contracts regarding proposed sales received from Lumar Land; confer with team regarding ; email counsel for Dixon requesting documents.	6.60	\$385.00	\$2,541.00
03/20/2023	CAC	Analyze Lumar dispute issues in preparation for meeting with Receiver, C. Koonce and T. Wells; meeting with Receiver, C. Koonce and T. Wells regarding upcoming meeting with Dixon Water	4.80	\$300.00	\$1,440.00

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		Foundation and Lumar; review discovery and docket filings from BM318 bankruptcy case in connection with same; draft summary of notes for same.			
03/20/2023	TBW	Revise Amerigold cashflow chart (.6); correspondence with J. Silvasan and Receiver regarding Amerigold (.4); correspondence with C. Koonce regarding (.2); correspondence with C. Koonce regarding (.1); correspondence with S. Latham regarding same (.2); review Goldmark records for ownership information (.6); review bank records for additional commingling of funds (.8); correspondence with Dallas Housing authority (.4); correspondence with counsel for Pioneer Finance and review of prior correspondence (.7); correspondence with C. Koonce regarding same (.2); correspondence with counsel for Lumar Land (.4); review agreement with Lumar regarding certification process (.2); review Lumar certifications (.9); compile bank record exhibits for C. Koonce (.2); correspondence with Walker Dunlop (.2); review 2999 TC LP notice of hearing (.1) correspondence with K. O'Rourke regarding same (.1); review court orders on Amerigold appraisers and hearing (.2); confer with Receiver, C. Koonce, and A. Carrillo regarding (.8).	7.40	\$200.00	\$1,480.00
03/21/2023	CCK	Review correspondence received from counsel for Dixon in preparation for meeting; review documents produced by Dixon and research by A. Carrillo; call with C. Thomas regarding  ; brief research regarding same; review notice from the 5th Cir setting arguments and confer with assistant regarding same; call with G. Shamoun regarding dispute with SPC; call with C. Thomas to discuss  ; review multiple emails, summaries and documents related to Dixon/Lumar; begin drafting SPC MSJ.	3.40	\$385.00	\$1,309.00
03/21/2023	CAC	Conduct review of documents produced by Dixon in BM318 bankruptcy case adversary proceeding; review docket filings from same; draft summary and analysis of procedural posture and facts for Receiver and Receiver's counsel; meet with Receiver regarding same; correspondence with	7.60	\$300.00	\$2,280.00

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		Receiver, T. Wells and C. Koonce regarding same.			
03/21/2023	TBW	Review mail (.7); correspondence with C. Koonce regarding same (.1); correspondence with counsel for S. Wall regarding mail received (.1); review Lumar records in preparation for meeting (1.8); correspondence with K. O'Rourke regarding check for Amerigold bill (.1); review bank records in response to questions from A. Carrillo (.7); correspondence with counsel for Lumar Land (.2); draft letters to IRS collection agencies (.8); create list of Lumar meeting attendees for Receiver (.2); confer with A. Carrillo regarding  (.4); confer with Receiver regarding  (.3); correspondence with potential property purchaser (.2); call with Atmos energy regarding shutoff notice (.3); review Lumar Land Agreement definitions (.2); correspondence with A. Carrillo and C. Koonce regarding same (.2); correspondence with Capital One (.1); complete Dallas Housing Authority vendor form (.3); review email from T. Huffman regarding personal property (.1); review summary of Lumar litigation from A. Carrillo (.4).	7.20	\$200.00	\$1,440.00
03/22/2023	CCK	Confer with C. Thomas regarding ; review summary from A. Carrillo ; confer with team regarding ; meet with C. Thomas and T. Wells to discuss ; continue drafting SPC MSJ, including analysis of documents and agreements.	5.10	\$385.00	\$1,963.50
03/22/2023	CAC	Meet with Receiver and T. Wells regarding Dixon/ Lumar dispute in connection with Bear Creek Ranch and BM318 bankruptcy; meet with Dixon and Lumar clients and attorneys regarding same; follow up meeting with Receiver, T. Wells and C. Koonce regarding same.	2.40	\$300.00	\$720.00
03/22/2023	TBW	Compile BM318 bank records in preparation for Lumar meeting (.2); prepare for meeting with Receiver (.3); participate in same (.6); prepare for meeting with Lumar Land and Dixon Water district regarding BM318 claims (.3); participate in same (2.2); debrief from meeting with Receiver, A.	7.50	\$200.00	\$1,500.00

		Carrillo, and C. Koonce (.3); review email from counsel for Moore Dunlop family regarding Amerigold (.2); correspondence with C. Koonce regarding same (.1); correspondence with Capital One (.1); set up Capital One secure portal (.2); review document production from same (.3); correspondence with S. Latham regarding same (.2); correspondence with Atmos Energy regarding receivership (.4); correspondence with accountants regarding notices from IRS (.2); revise letter to debt collection company (.4); correspondence with Tesla (.2); review filings to determine needed responses (.3); confer with C. Koonce regarding same (.1); confer with Receiver and C. Koonce regarding (.6); correspondence with Receiver regarding Texas Brand Bank (.1); call with counsel for Lumar Land (.2).			
03/23/2023	CCK	Review communication from title co for Rock Creek and resend releases of abstracts; Confer with T. Wells regarding ; calls with C. Thomas to discuss ; email Barton's counsel regarding tax returns; brief review of Barton's Motion for Leave to file a Sur-Reply; continue drafting Motion for Summary Judgment regarding SPC; review docket entry in bankruptcy case that was stayed and instruct assistant to call the court regarding same; confer with assistant regarding ; research regarding  continue reviewing documents related to SPC transaction.	6.20	\$385.00	\$2,387.00
03/23/2023	SRL	Receive and initial review of document production from Capital One regarding accounts owned by Receivership Entities.	0.40	\$110.00	\$44.00
03/23/2023	TBW	Review records for missing documents from Texas Brand Bank (.8); correspondence with counsel for Texas Brand Bank regarding additional records (.7); review production from same (.3); review records for property manager agreements (.5); correspondence with C. Koonce regarding same (.1); correspondence with insurer for Amerigold regarding receivership and potential injury lawsuit	8.90	\$200.00	\$1,780.00

	(.6); research document moving companies (.5); correspondence with Receiver, K. O'Rourke, and S. Latham regarding  (.3); confer with Receiver regarding  (.2); correspondence with Walker Dunlop regarding due diligence items (.2); correspondence with J. Silvasan regarding same (.2); draft email to Venus Municipal Court (.3); correspondence with Beltway Capital regarding Amerigold W-9 (.2); confer with Receiver regarding (.2); review apartment property loan records for T. Barton's title in each entity and evidence to support and draft email to C. Koonce regarding findings (1.9); correspondence with counsel for Pate Jones paving (.3); review T. Barton motion for leave to file sur reply (.2); correspondence with Tesla (.1); correspondence with S. Latham regarding Capital One production (.1); draft response to counsel for Lumar Land regarding certifications (1.2).			
03/24/2023 CCF	Continue review of relevant documents and drafting MSJ regarding SPC issues; telephone conference with appellate counsel for the SEC regarding Rock Creek appeal and issues in additional appeals; call with C. Thomas to discuss ; review appellate brief in Max Barton's appeal; email exchanges with party seeking to "tour" Turtle Creek property; review and edit response regarding T. Barton's request for release of certain property located in Receivership Entity locations; confer with C. Thomas regarding	4.90	\$385.00	\$1,886.50
03/24/2023 TBV	Correspondence with J. Silvasan regarding HVAC repair (.2); briefly review management agreements for Bellwether Ridge and Windmill Farms (.3); correspondence with counsel for Amerigold insurer (.6); confer with Receiver regarding  (.5); draft response to T. Huffman email regarding  T. Barton personal property (1.7); call with property broker regarding updates on apartment properties (.2); continue review Ridgeview agreements and deeds of trust and creating summary (1.6); begin drafting motion for leave to file as Amicus in Rock Creek appeal (.8).	6.40	\$200.00	\$1,280.00

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03/27/2023	CCK	Review transcript from recent hearing; confer with C. Thomas regarding; confer with C. Thomas regarding arguments related to SPC and continue drafting MSJ regarding SPC.	6.30	\$385.00	\$2,425.50
03/27/2023	CAC	Begin drafting motion to approve settlement regarding 2999 Turtle Creek mediation and settlement.	0.20	\$300.00	\$60.00
03/27/2023	SRL	Review and organize document production received from Capital One on accounts owned by Receivership Entities.	0.40	\$110.00	\$44.00
03/27/2023	TBW	Finish drafting motion for leave to file as amicus (3.4); confer with Receiver regarding  (.6); correspondence with C. Carr regarding visit to 2999 Turtle Creek (.2); correspondence with M. Trammell regarding Ridgeview Addition citations (.3); correspondence with J. Silvasan regarding additional HVAC repairs (.2); begin drafting Amicus brief for Rock Creek appeal (2.6); correspondence with K. O'Rourke regarding letter for personal property response (.1).	7.40	\$200.00	\$1,480.00
03/28/2023	SRL	Continue review of Capital One document production; prepare same for transmission to CPA.	2.20	\$110.00	\$242.00
03/28/2023	CAC	Continue drafting motion to approve 2999 Turtle Creek settlement.	3.20	\$300.00	\$960.00
03/28/2023	CCK	Continue drafting MSJ regarding SPC claims; review documents related to Ingleside and Opelika regarding same; research regarding ; confer with C. Thomas regarding ; call with T. Wells to discuss ; call with C. Thomas to discuss	7.30	\$385.00	\$2,810.50
03/28/2023	TBW	Review Capital One bank statements flagged by S. Latham and correspondence regarding same (.3); compile payroll for Amerigold (.2); correspondence with K. O'Rourke regarding checks for same (.1); create list of upcoming	7.80	\$200.00	\$1,560.00

		Amerigold payments for Receiver (.3); pay insurance for Goldmark (.2); revise letter responding to T. Barton personal property (1.4); confer with Receiver regarding (.2); correspondence with counsel for Lumar Land regarding commissions in certifications (.3); correspondence with counsel for Air Texas regarding mailing address for invoices (.3); review Air Texas invoices for HVAC repairs to Amerigold Suites and correspondence with K. O'Rourke regarding checks for same (.3); travel to Bees Keys to get key made for safe at 2999 Turtle Creek (.5); travel to 2999 Turtle Creek to meet HN Capital representatives to tour property (1.6); return to office (.3); continue drafting amicus brief for Rock Creek appeal (1.6); correspondence with counsel for Atmos energy (.2).			
03/29/2023	CAC	Continue drafting motion to ratify 2999 Turtle Creek settlement.	3.50	\$300.00	\$1,050.00
03/29/2023	SRL	Research regarding	0.40	\$110.00	\$44.00
03/29/2023	CCK	Continue drafting MSJ regarding SPC; review SEC's brief regarding Rock Creek appeal.	5.20	\$385.00	\$2,002.00
03/29/2023	TBW	Finalize personal property letter (.9); revise letters to send to EZ Tax and A. Morani (.6); call with interested property buyer (.3); correspondence with counsel for Rinaldi group regarding unpaid invoices and claims process (.2); review order granting sale of Amerigold Suites (.1); review SEC appellee brief (.4); review records regarding Escue energy (.3); draft response to Southern Properties motion to intervene/complaint in intervention (5.8).	8.60	\$200.00	\$1,720.00
03/30/2023	CCK	Review and revise response to SPC's Complaint in Intervention and supporting order; respond to email from SEC regarding extension in Max appeal; confer with C. Thomas regarding same; review notices received regarding forfeiture of tax status and respond to same; further call with C. Thomas to discuss  ; confer with T Wells regarding locating various company documents and confer with C. Thomas regarding corporate review of various documents; email J. Mahaffey regarding  ; review	5.50	\$385.00	\$2,117.50

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		information received from counsel for S. Bedoya and confer with T. Wells regarding same; review information received from T. Wells regarding			
03/30/2023	CAC	Draft motion to approve 2999 Turtle Creek settlement; circulate to Receiver for review.	1.60	\$300.00	\$480.00
03/30/2023	TBW	Review mail (.6); correspondence with accountants regarding entity forfeiture notices (.2); correspondence with counsel for S. Bedoya regarding NTTA notices (.1); revise letters to Universal Solar and Wallis Bank (.5); call with D. Huey regarding Hall Street property (.3); correspondence with receiver regarding same (.1); revise response to Southern Properties motion to intervene/complaint in intervention (1.7); create proposed order for same (.3); verify deadline for response (.1); correspondence with Walker Dunlop regarding Amerigold (.4); review records regarding Cynergy Resources Group (.4); miscellaneous correspondence (.3); call with republic Services to pay invoice (.2); correspondence with Wallis Bank (.3); correspondence with counsel for Southern Properties regarding Venus properties (.3); update Receiver and C. Koonce regarding same (.2); correspondence with auctioneer for Turtle Creek (.2); research commercial movers (.4); correspondence with Hot Shots moving (.2); correspondence with Public Storage (.3); review records for company agreements for D4IN, D4FR, D4DS, D4OP (.3).	7.40	\$200.00	\$1,480.00
03/31/2023	CCK	conference on same; and further edits to motion; confer with assistant regarding providing documents to J. Mahaffey for review ISO SPC motion for summary judgment; review and comment on auction contract; research regarding	5.20	\$385.00	\$2,002.00
03/31/2023	CAC	Continue drafting mediation statement for Bear Creek Ranch dispute with Dixon and Lumar.	1.20	\$300.00	\$360.00
03/31/2023	TBW	Review bank records regarding D4IN transaction (.8); correspondence with Landmark Grading (.6); finalize response to Southern Properties motion to	3.60	\$200.00	\$720.00

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intervene/complaint in intervention (.4); correspondence with counsel for Lumar Land (.8); correspondence with Receiver regarding (.2); sign up for Dallas Housing authority portal (.2); miscellaneous communications (.3); respond to email from property broker (.1); review and pay invoice for Air Texas (.2).

**Quantity Subtotal** 

633.0

**Subtotal** \$156,848.00

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

Date	Initials	Description	Hours	Rate	Client Total
01/01/2023	CCK	Continue drafting Response to Motion for Stay filed in 5th Cir.	2.90	\$385.00	\$1,116.50
01/01/2023	TBW	Travel to 3600 Gillespie to secure broken windows and return to office. [No charge]	1.60	\$0.00	\$0.00
01/02/2023	TBW	Finish drafting Fifth Circuit Motion to Dismiss.	4.20	\$200.00	\$840.00
01/02/2023	ССК	Continue drafting Response to Motion to Stay; email exchange with C. Thomas regarding scheduled foreclosure; email lender regarding same; revise motion to dismiss appeal regarding DLP Order; continue drafting motion to show cause.	10.40	\$385.00	\$4,004.00
01/03/2023	SRL	Prepare draft Receiver's Motion for Leave to File Response; prepare list of investors, list of creditors, list of all parties with lawsuits against Barton entities in which a Notice of Stay has been filed, and a list of all Barton entities for Certificate of Interested Parties; assist with revisions to Receiver's Brief in Support of Response to Motion for Stay; prepare Appendix in Support of Receiver's Response to Motion for Stay.	6.30	\$110.00	\$693.00
01/03/2023	ССК	Calls with 5th COA records and docketing clerk regarding access to the ROA and permission to file response; call with appellate clerk at Northern District of Texas regarding record on appeal; confer with C. Thomas regarding ; further emails with lender regarding stayed foreclosure; email SEC regarding requested sharing of record on appeal; confer with	10.20	\$385.00	\$3,927.00

		Barton's counsel regarding motion to dismiss various appeals; email exchanges with counsel regarding conference on motion to appear and extend page limit for Amici brief; review briefing rules; further email to 5th COA clerk regarding request to re-docket showing the Receiver as an appellee; confer with S. Latham regarding listing additional interested persons and briefing issues; review research received from T. Wells for inclusion in response; confer with C. Thomas regarding  ; edit motion for inclusion as interested party; edit Response to Motion to Stay DLP motion, and continued drafting/edits to Response to Motion to Stay in the appellate court; confer with C. Thomas regarding			
01/03/2023	TBW	Research  ; schedule movers to move mattresses from 4107 Rock Creek; call to T. Huffman conferring on motion; draft email to Merrill Lynch regarding response letter; review bank statements and capture screenshots to include in same; call with J. Silvasan regarding Amerigold repairs; draft email to C. Thomas regarding ; pay Amerigold TXU bill; research ; draft motion to include receiver as appellee.	8.60	\$200.00	\$1,720.00
01/04/2023	SRL	Prepare Appendix for Receiver's Verified Response to Barton's Motion to Stay Pending Appeal of Order Granting Receiver's Motion to Ratify Agreement with DLP Capital; finalize and file Response and Appendix; revise Appendix in Support of Receiver's Response to Barton's Motion to Stay for filing in Fifth Court of Appeals.	2.30	\$110.00	\$253.00
01/04/2023	CCK	; confer with E. Espinosa regarding DLP issues; respond to email from lender on Rock Creek regarding assignment of rents provision; continue drafting Response to Motion to Stay, adding record references; revise Motion to Inclusion as a Real Party and confer with C. Thomas regarding same; close review of 5th COA rules regarding technical briefing requirements, and appendixes; review appendix in	8.40	\$385.00	\$3,234.00

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		support of Response to Motion to Stay and edits to same; further edits to Response to Motion to Stay DLP Motion.			
01/04/2023	TBW	Respond to emails from Walker Dunlop regarding Amerigold Suites; review Receiver's district court response to Motion for Stay; travel to 4107 Rock creek; assist mover with moving mattresses and bedding to moving trailer; travel to 2999 Turtle Creek; unload mattresses and bedding at 2999 Turtle Creek; return to office; respond to emails from M. Gill and K. Hill regarding insurance for Amerigold Suites; respond to email from A. Blaylock regarding life insurance policy; communicate with Simplex Business Solutions regarding time to pick up leased copier from 2999 Turtle Creek; draft email to D. Cromwell regarding Louisiana National Bank; call and follow up email with B. Hickey regarding invoice for appraisal in Arizona; call with S. Rodriguez and D. Bensinger regarding Merrill Lynch letter; call and follow up email with J. Richards regarding receivership entity water bills; review Receiver's Fifth Circuit response to motion to stay.	9.60	\$200.00	\$1,920.00
01/05/2023	SRL	Revise, finalize, and file Receiver's Motion to Appear as Interested Party with Receiver's Response to Motion to Stay Pending Appeal and Appendix in Support of Receiver's Response to Motion to Stay Pending Appeal in Fifth Circuit Court of Appeal.	1.50	\$110.00	\$165.00
01/05/2023	TBW	Review insurance documents from M. Gill and K. Hill for Amerigold Suites; respond to email from C. Murray regarding USI Bond for Marine Creek; draft email with payment amount for Goldmark payments and send to K. O'Rourke; email B. Armstrong for Amerigold Insurance loss runs; respond to email from M. Sosland regarding Louisiana Bank representation; email D. Rollins regarding survey for Amerigold Suites; call TXU regarding Gillespie Villas; call J. Masters regarding Pate Jones and Ridgeview lien; email to C. Koonce and C. Thomas regarding same; review receivership enmity DWU water bills; communicate with J. Richards regarding Rock Creek account; pay Rock Creek water bill; email C. Koonce and S. Latham regarding	7.80	\$200.00	\$1,560.00
01/06/2023	TBW	Review DWU water bill statements; email to K.	7.10	\$200.00	\$1,420.00

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O'Rourke with details for DWU payments; call with USI insurance regarding cancellation of surety bond for Marine Creek; revise letter to Texas WorkForce Commission regarding HR Sterling taxes; draft email to DWU regarding account status and procedure for transferring account to new tenant; call with E. Espinosa regarding Marine Creek surety bond; email to S. Neame regarding appraisals for properties; communicate D. Graham and P. Wilson regarding needed information for property appraisals; review Lost Creek information sent by C. Koonce.

#### 01/09/2023 TBW

Respond to email from D. Graham and T. Ware regarding property appraisals; email to counsel for GTT Communications regarding receipt of solicitation package addressed to JMJ Development; participate in call with C. Thomas and J. Moon; review bank records spreadsheet; email to S. Latham regarding additions for same; respond to email form A. Gamez at DWU; email to C. Thomas regarding

; email to K. O'Rourke with details for payment of Impact Solutions invoice for Amerigold Suites; respond to email from C. Tait regarding Wells Fargo bank records; multiple emails to R. Jones regarding meeting at 2999 Turtle Creek; multiple emails to B. Hickey regarding ATI appraisal in Arizona; multiple emails to S. Neame regarding property appraisals; begin creating cash accounting summary for Goldmark Hospitality.

#### 01/10/2023 TBW

Review Barton's Notice of Non Opposition to Frisco sale and Reply to Motion to Stay Court's Order Ratifying Sale to DLP; multiple emails to B. Armstrong, S. Baird, and M. Zacharias regarding insurance loss run for Amerigold Suites; review appraisal from ATI for 500 Seague LLC; call with R. Jones regarding meeting at 2999 Turtle Creek; review past due tax bills sent by Texas Workforce Commission for HR Sterling; finish Goldmark Hospitality cash accounting summary; create cash accounting summary for Receivership Account; revise Goldmark cash accounting summary; email to J. Silvasan regarding information needed for Amerigold Suites appraisal; email to M. Taylor regarding cash accounting summaries; call with D. Bensinger and S. Rodriguez regarding Merrill Lynch accounts; multiple emails to S. Neame regarding information for property appraisals;

7.80 \$200.00 \$1,560.00

8.70 \$200.00 \$1,740.00

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		respond to email from E. Reid at Texas WorkForce Commission regarding HR Sterling; emails to C. Thomas and C. Koonce regarding ; review Receivership Order for notice requirement related to non party bank accounts; email to C. Koonce regarding findings from same.			
01/11/2023	CCK	; continue drafting Motion to Show Cause and confer with C. Thomas regarding same; begin gathering/selecting evidence in support of Motion to Show Cause; confer with T. Wells regarding ; review email from counsel for Golf Course regarding settlement negotiations and confer with C. Thomas regarding same; review Barton's Appellant's brief filed today in the 5th COA; review T. Barton's email to C. Thomas and review and revise proposed response; review information receive from attorney who received payments from Receivership Entities and who stated he was in partnership with attorney representing Barton; confer with S. Latham and K. O'Rourke regarding further investigation, tracking payments, and dates on which various events occurred; review and analyze payment dates, amounts, and memo references, and other information regarding same; respond to email from counsel for Rice Assets; review information about TWC lien on assets of one entity and confer with T. Wells and C. Thomas regarding effect of same and priority for payment.	3.50	\$385.00	\$1,347.50
01/11/2023	SRL	Prepare and file Notice of Stay in Dallas County case filed by J. Dowdall against 2999TC JMJ CMGR, LLC and JMJ Development.	0.70	\$110.00	\$77.00
01/11/2023	TBW	Review T. Barton's Appellant brief filed in Fifth Circuit; respond to questions from C. Thompson regarding Amerigold Suites; travel to 2999 Turtle Creek to supervise removal of copy machine by Simplex; review receivership entity bank records stored at 2999 Turtle Creek; return to office from 2999 Turtle Creek; call with counsel for GTT communications regarding bankruptcy solicitation letter; scan receivership entity bank records and send to S. Latham; draft email to S. Latham regarding	7.60	\$200.00	\$1,520.00

		; review bank account master list recovered from 2999 Turtle Creek; respond to email from K. Taylor regarding Wall bankruptcies and claims process; call with A. Blaylock regarding Legal & General insurance policy; review agricultural exemption form for property in Johnson County and search Johnson County appraisal district for date of property transfer; review property tax statement for BM 318.			
01/12/2023	CCK	Confer with C. Thomas regarding  ; call with SEC to confer about appellate issues; further conference with C. Thomas regarding  research regarding  ; revise Motion to  Show Cause to request order compelling compliance pursuant to Rule 37; confer with  Barton's counsel regarding correcting the docket to reflect the Receiver as the Appellee; review  ; review order setting hearing to consider sale of Frisco property; review Max Barton's appeal of order related to Max Barton entities; confer with T. Wells regarding	4.20	\$385.00	\$1,617.00
01/12/2023	TBW	Emails to M. Ahuja regarding HR Sterling Tax bills and unemployment tax report; emails with Sunridge Management regarding document link; pay additional Goldmark insurance premium; emails with S. Neame regarding appraisals; search for HR Sterling payment records; review HR Sterling bank statements; email to C. Thomas regarding ; email to E. Espinosa regarding Marine Creek surety bond; call with G. Wolf regarding Segoe Arizona land purchase; email to J. Richards regarding DWU termination notice for several receivership properties; review receivership mail; call with T. Scott regarding Movestar scheduling; review order from Court regarding approval of Frisco Gate sale; begin revising Fifth Circuit motion to Appear as Appellee or Interested Party.	7.90	\$200.00	\$1,580.00
01/13/2023	CCK	Continue revisions to Motion to Compel and	2.00	\$385.00	\$770.00

		forward same to C. Thomas for further edits/comments; review notice from 5th COA requesting revised notice of appearance; draft email to clerk of the court requesting revised docket to reflect the Receiver as the Appellee; review response and confer with C. Thomas regarding same; review summary prepared by S. Latham for payments made to attorney Guenley rather than Walji.			
01/13/2023	TBW	Respond to email from C. Thompson regarding questions about Amerigold; email to C. Koonce and S. Latham regarding information on A. Paige; call with Banner Life Insurance regarding regarding policy letter received in mail; communications with J. Silvasan regarding Amerigold bills; review Air Texas bill for HVAC repairs at Amerigold Suites; email to K. O'Rourke regarding payment instructions for same; review bank account spreadsheet status from S. Latham; begin reviewing stayed litigation dockets and drafting case summaries regarding current disposition of cases.	5.30	\$200.00	\$1,060.00
01/16/2023	SRL	Review docket history of cases filed by Hodges Parties against 2999TC LC, LLP, JMJ Development, and T. Barton to assist T. Wells in preparation of summary for Receiver's Status Report.	1.60	\$110.00	\$176.00
01/17/2023	CCK	Email exchange with C. Thomas and M. Ahuja regarding QuickBooks access; emails with Intuit counsel regarding same; review emails regarding hearings and settings in EDTX bankruptcy case and review case summaries and emails with counsel regarding the nature of the related, but stayed adversaries; respond to email from lender; confer with C. Thomas regarding  ; review and respond to email from counsel in stayed case regarding settlement inquiry (BGE v. JMJ); review additional email from attorney for 3820 Illinois and Tamamoi regarding request for resolution and confer with T. Wells regarding  ; review Lumar land contract and confer with C. Thomas regarding ; confer with T. Wells ; review order denying motion to stay.	2.20	\$385.00	\$847.00
01/17/2023	TBW	Communications with C. Koonce and K. O'Rourke	7.40	\$200.00	\$1,480.00

		regarding to email form S. Vitorino regarding Marine Creek surety bond; communications with Receiver regarding ; communications with Receiver regarding ; call with H. Spector regarding 3820 E. Illinois property; follow up emails to Receiver and counsel regarding ; follow up emails with counsel for 3820 LLC and Tamamoi LLC inquiring about proposal to begin settlement talks; review master bank account spreadsheet from S. Latham; call with R. Chapple regarding Amerigold personal injury case; continue reviewing stayed litigation docket and drafting summaries.			
01/18/2023	TBW	Research regarding  ; draft email to C. Koonce regarding ; email to P. Wilson requesting information for Opelika apartments; research regarding ; email to C. Koonce regarding ; communications with T. Jones regarding Lost Creek golf course; communications with C. Koonce regarding call to Childress Engineering; call with M. Sosland regarding Louisiana National Bank documents.	7.90	\$200.00	\$1,580.00
01/19/2023	CCK	Confer with C. Thomas regarding  ; continue drafting C. Thomas  Declaration in support of motion to compel, locating and selecting supporting evidence and confer with C. Thomas regarding same; review and revise letter to law firm sending invoices; confer with T. Wells regarding  ; call with SEC to confer about Motion to Compel; revise Order granting Motion to Compel; continue drafting/revising Motion for recognition as Appellee regarding Rock Creek appeal; review lengthy letter from M. Edney responding to conference on motion to compel and draft response to same (for use in Reply); confer with C. Thomas regarding	7.40	\$385.00	\$2,849.00
01/19/2023	TBW	Review master bank account chart for missing accounts (.2); correspondence with C. Koonce, S. Latham, and C. Thomas regarding	3.40	\$200.00	\$680.00

		(.4); correspondence with B.  Shanklin regarding Childress Engineers CAD file (.3); correspondence to C. Koons regarding electronics at 2999 Turtle Creek and meeting to retrieve same (.3); correspondence with counsel for Third Coast Bank regarding letter sent to Elite Jet Services and status of loan on Barton aircraft (.4); review draft email from C. Koonce (.2); correspondence with C. Koonce regarding  (.3); correspondence with D. Graham regarding apartment appraisals (.2); review and revise template for supplemental letter to banks (.5); correspondence Waste Management regarding retrieval of property and time to file claim (.2); correspondence with counsel for Texas Brand Bank (.1); correspondence with counsel for Merrill Lynch regarding updates (.3).			
01/19/2023	TBW	Continue reviewing stayed litigation docket and drafting summaries (4.7). [Rate reduced to \$100.]	4.70	\$100.00	\$470.00
01/20/2023	CCK	Review email from Barton's counsel proposing list of attorneys to include in privilege protocol; confer with C. Thomas regarding  ; review prior emails/communications about privilege issues and draft response; review and revise motion to dismiss Rock Creek Appeal, and further edits to motion for leave to file same; call with counsel for lender Pioneer; further communications and instructions to assistant regarding filings in 5th Circuit.	3.60	\$385.00	\$1,386.00
01/23/2023	TBW	Correspondence with B. Armstrong regarding missing loss run for Amerigold Suites Insurance (.1) correspondence with Reveal Insurance regarding same (.2); call to Childress Engineers (.1); review and revise letters to Chase and Bank of America (.3); begin researching (1.4); meet Veracity Forensics at 2999 Turtle Creek including travel to and from office (1.7).	3.80	\$200.00	\$760.00
01/23/2023	TBW	Finish reviewing dockets for stayed cases and drafting summaries (4.8). [Rate reduced to \$100.]	4.80	\$100.00	\$480.00
01/24/2023	SRL	Research .	0.50	\$110.00	\$55.00

01/25/2023	CCK	email counsel for S. Bedyoa regarding assistance/information necessary to prepare W-9s; review notice of deficiency received from L. Lindauer regarding bankruptcy matter for Dallas Real Estate Investors LLC and provide instruction to T. Wells regarding responding to same; review letter from Lindauer confirming no services provided to Barton since date of receivership; confer  ; review Fifth Circuit order deeming the Receiver the appellee and filing our "amicus" motion to dismiss and confer with C. Thomas regarding strategy related to DLP settlement appeal; review letter received from S. Metzger confirming no fees received since 10/18/22.	1.00	\$385.00	\$385.00
01/25/2023	TBW	Correspondence with Receiver regarding  (.2); gather tax statements for receivership entities (.8); create chart of receivership tax payments due (1.2); correspondence with counsel for Lumar Land regarding BM318 (.3); correspondence with counsel for Louisiana National Bank regarding loan documents and communications with prospective buyers (.3); correspondence with P. Wilson regarding information on apartments (.1); correspondence with D. Graham regarding information on apartments (.1); finish research  (2.4); review Turtle Creek HNGH chart from A. Carrillo (.3); create amortization chart for Turtle Creek HNGH loan (1.1); review completed chart with A. Carrillo and Receiver (.3); revise receiver fee citation with docket cites (.2); correspondence with NVC regarding requested documents for appraisal (.3); call with J. Silvasan regarding Amerigold suites (.2); correspondence with S. Latham regarding supplemental letters to banks (.1).	7.90	\$200.00	\$1,580.00
01/26/2023	CCK	Review email from prior counsel for Barton, Van Shaw, regarding claims process; respond to same; further conference  ; confer with C. Thomas regarding ; confer with T. Wells and A. Carrillo regarding	1.00	\$385.00	\$385.00

		; review status of Rock Creek appeal; review and revise status update regarding Dallas Real Estate Investors bankruptcy; review and revise Notice of Publication regarding the Gate to include reference to Addendum.			
01/26/2023	TBW	Review and revise letters to Wells Fargo, Veritex, and Texas Republic (.5); correspondence with Sunridge Management regarding requests for information (.1); correspondence with A. Sheehan regarding D4OP and litigation stay (.6); correspondence with Vista Bank regarding search for additional information (.3); correspondence with Wells Fargo regarding response to letter (.2); correspondence with Receiver regarding (.1); pay Goldmark Insurance payment (.2); review order from court clerk requesting status update in Dallas Real Estate Investors LLC bankruptcy (.2); draft and revise status update letter to Bankruptcy Court regarding same (1.6); review response from Texas Republic Bank (.2); correspondence with S. Latham regarding same (.2); revise Notice of Frisco Gate sale to include reference to addendum (.6); correspondence with J. Silvasan regarding paychecks and repairs (.3); correspondence with NVC regarding operating statements for appraisals (.1); pay final Rock Creek TXU bill (.2); correspondence with C. Koonce regarding (.2); correspondence with Receiver and co-counsel regarding (.1); miscellaneous correspondence with Receiver regarding ancillary matters (.5).	6.40	\$200.00	\$1,280.00
01/27/2023	TBW	Retrieve additional information regarding property taxes and add to chart (.8); meeting with Receiver regarding (.3); correspondence with K. O'Rourke regarding (.2); correspondence with E. Espinosa regarding Marine creek bond (.2); correspondence with M. Luosey regarding letter to compushare (.2); correspondence with Vista bank regarding Goldmark account (.2); correspondence with counsel for lender on Frisco Gate property regarding property taxes (.3); correspondence with Goldmark lender regarding property taxes and status on marketing property (.4); correspondence with M. Taylor regarding information on	5.20	\$200.00	\$1,040.00

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		Amerigold Suites (.2); correspondence with Louisiana National Bank regarding property taxes (.1); call with Childress Engineers (.3); correspondence with C. Scott regarding Ridgeview Addition CAD drawing (.8); correspondence with Texas Brand Bank regarding additional information on accounts (.1); update Receiver (.2); correspondence with Lumar Land regarding status (.3); correspondence with J. Silvasan regarding carpet replacement (.1); review revised Agreement with Lumar Land (.3); correspondence with K. O'Rourke regarding filing status update for Dallas Real Estate Investors bankruptcy (.1); correspondence with counsel for Merrill Lynch (.1).			
01/27/2023	TBW	Begin drafting motion for determination of settlement agreements (1.6). [Rate reduced to \$100]	1.60	\$100.00	\$160.00
01/28/2023	TBW	Continue drafting motion for ratification of settlement agreements.	3.20	\$200.00	\$640.00
01/29/2023	CCK	Confer with C. Thomas regarding ; review motion for declaration regarding Lumar land settlement and § 2001 and begin revising same.	0.60	\$385.00	\$231.00
01/29/2023	TBW	Finish drafting motion for ratification of settlement agreements.	2.10	\$200.00	\$420.00
01/30/2023	SRL	Research information on Economic Injury Disaster Loan and telephone call to Small Business Association to determine loan taken out by Receivership Entity.	0.60	\$110.00	\$66.00
01/30/2023	CAC	Conduct research and review docket filings re 2999 Turtle Creek in connection with 2999TC bankruptcy and HNGH dispute; correspondence with Receiver re same.	2.20	\$350.00	\$770.00
01/30/2023	CAC	Conduct research and review docket filings re 2999 Turtle Creek in connection with 2999TC bankruptcy and HNGH dispute; correspondence with Receiver regarding same.	2.20	\$300.00	\$660.00
02/01/2023	CCK	Review response to request for information from M. Barton regarding Gillespie Villas and confer with C. Thomas regarding same; review documents and info received from lender on Gillespie and forward same to C. Thomas; review emails from Intuit regarding continuing inability to provide	0.50	\$385.00	\$192.50

		access; confer with C. Thomas			
02/02/2023	CCK	confer with C. Thomas regarding; review C. Thomas instructions regarding notifying defendants of accruing damages related to continued inability to access Quickbooks for HUD loans; draft email to defendants' counsel regarding same; draft email to Intuit regarding same; draft letter to M. Barton's counsel regarding his intent to remove fixtures from Gillespie Villas when he moves and transferring utilities to C. Thomas; call with R. Roper regarding QB issues; call with C. Thomas regarding same; draft letter to A. Karieda, accountant who may have assisted the entities; Confer with C. Thomas regarding ; draft email to IGO regarding same.	1.80	\$385.00	\$693.00
02/03/2023	CCK	Review information received from IGO regarding Frisco Gate; confer with C. Thomas regarding same; further response; telephone conference with C. Thomas and T. Wells regarding ; review information received from T. Wells regarding ; ; review response to settlement offer received from HNGN's counsel; review information from T. Wells regarding insurance coverage for Gillespie and confer regarding same; revise letter to additional accounting firm identified by C. Thomas; review and respond to email from Pioneer, Venus lender; review and respond to email from Barton's counsel requesting extension to respond to email from Intuit regarding status of QB access.	1.60	\$385.00	\$616.00
02/06/2023	CCK	Review message from the SEC regarding appellate question; confer with C. Thomas regarding same and return call; confer with T. Wells regarding  .	0.40	\$385.00	\$154.00
02/07/2023	CCK	Email counsel regarding	0.30	\$385.00	\$115.50

		; confer with C. Thomas regarding			
02/09/2023	CCK	Confer with C. Thomas regarding strategy related to M. Barton appeal; call K. Bernstein regarding same; quick review of SEC's response brief in main appeal; continue drafting and editing motion to intervene and motion to dismiss for DLP appeal; review and revise template letter to V. and M. Barton regarding retrieving their personal property and confer with T. Wells and C. Thomas regarding strategy related to recovery of V. Barton's car, titled in the name of JMJ; email to R. Marx regarding failure to respond to letter requesting documents and information about the source of funds he has been paid with; begin drafting motion to compel same, from Hunton, Holland & knight and the Marx law firm.	3.20	\$385.00	\$1,232.00
02/13/2023	CCK	Review Barton's Response to Motion to Ratify Lumar Land settlement; confer with C. Thomas regarding  ; review information located by T. Wells regarding ; review email from Roper regarding amount and origin of fees paid; review notes from meeting with V. McMurray regarding status of various lawsuits; review notice from COA regarding rejection of NOA in Max appeal; review C. Thomas comments about motion to intervene in DLP appeal; review and revise same and confer with assistant regarding filing same; continued review of pleadings related to Lumar bankruptcy and preparing reply ISO motion to ratify agreement regarding same.	7.60	\$385.00	\$2,926.00
02/16/2023	TBW	Correspondence with counsel for Air Texas regarding receivership process and status of past due bills (.6); confer with C. Koonce regarding same (.1); review Air Texas records (.2); correspondence with Franklin Street regarding SF Rock Creek insurance (.2); revise letters to Texas Bank and Happy State Bank (.6); review letter from M. Edney regarding access to information (.2); review Amerigold bills and ledger balance (.2); correspondence with J. Silvasan regarding Amerigold bills and repairs (.2); correspondence with Receiver regarding same (.2); review records and create chart of possible receivership vehicles,	7.30	\$200.00	\$1,460.00

		create packet regarding owner information, and research vehicle values (2.8); confer with C. Koonce regarding same (.2); briefly review Texas Republic bank production (.3); respond to email from Waste Management regarding claims process (.1); call with Republic Services (.3); revise letter to Microsoft (.4); confer with C. Thomas and C. Koonce regarding meeting (.1); call with Atmos Energy regarding past due bills (.5); briefly review bills from same (.1).			
02/17/2023	CCK	Review and revise listing agreement for Hall property and confer with C. Thomas regarding same; review Barton response to motion to compel and continue drafting reply in support of same; call with C. Thomas and T. Wells to discuss  ; review and revise letter to counsel for golf course.	2.70	\$385.00	\$1,039.50
02/22/2023	CCK	Respond to email from US Trustee regarding resetting hearing on motion to dismiss; review and edit appraisal/valuation services related to certain realty; call with clerk at the Fifth Circuit regarding docket issues for Rock Creek and DLP appeal and whether we will be permitted to file an appellee's brief; continue drafting Reply ISO motion to compel; review and revise motion to approve sale for Windmill Parc and Bellwether Ridge; confer with M. Mead regarding employment perspective regarding privilege issues included in motion to compel; research regarding same, and one client's entitlement to waive privilege as to jointly represented group; review order granting motion to ratify Lumar agreement; email same to Lumar and Dixon requesting meeting; call with the SEC to discuss motions to approve sales and whether the Receiver will be permitted to brief, as an appellee, in the Rock Creek appeal.	8.00	\$385.00	\$3,080.00
02/23/2023	CCK	Review objection received from Wells Fargo to request for documents; confer with T. Wells and C. Thomas regarding ; review emails regarding availability for meeting with Lumar and Dixon and respond to email regarding same; return call to B. Forshay, counsel for Lumar regarding settlement discussions; review email from G. Werley responding to letter regarding golf course litigation and lis pendens; confer with C. Thomas regarding	7.70	\$385.00	\$2,964.50

		; confer with T. Wells and K. O'Rourke regarding ; email J. Lindauer following up regarding transfer of litigation file for Dixon/Lumar litigation; respond to Werley email and confer with C. Thomas regarding ; revise draft privilege protocol for inclusion as an exhibit to the Reply; review T. Wells questions related to certain pieces of mail and respond to same; review T. Wells research regarding ; continue drafting Reply ISO motion to compel; review and revise lis pendens for golf course property.			
02/24/2023	CCK	Continued research and communications regarding best arguments related to Fifth Amendment for the Reply ISO motion to compel, call with C. Thomas regarding ; emails with Dixon and Lumar regarding scheduling settlement conference; call with the Fifth Circuit regarding their reconsideration of the order regarding Rock Creek appeal; continue drafting Reply.	8.20	\$385.00	\$3,157.00
02/27/2023	CCK	Continue drafting and editing Reply ISO motion to compel; email exchange with J. Lindauer regarding file for BM318 litigation; confer with C. Thomas regarding  .; review file received from J. Lindauer and forward same to A. Carrillo.	2.40	\$385.00	\$924.00
02/28/2023	CCK	Review appellant's brief on Rock Creek Appeal and review rules regarding when amicus may file response; confer  ; review checks and information summarized by T. Wells regarding JMJ transfers to Rock Creek to fund purchase of Rock Creek property; confer with C. Thomas regarding strategy	1.00	\$385.00	\$385.00
03/01/2023	CCK	Calls with C. Thomas to discuss ; review and revise Motion for Approval of Amerigold property and order; confer with C. Thomas regarding same; final review of Reply ISO motion to compel; review and respond to email from counsel for Elite Jets regarding trial setting just issued; confer with T.	1.80	\$385.00	\$693.00

		Wells regarding ; review correspondence from counsel for Max regarding retrieval of personal items and confer with C. Thomas and T. Wells ; revise conference email regarding Amerigold sale; confer with S. Latham regarding recent bank production.			
03/01/2023	SRL	Receive and initiate review of voluminous supplemental production from JP Morgan Chase on accounts owned by Receivership Entities.	0.40	\$110.00	\$44.00
03/02/2023	SRL	Research Ridgeview Addition real property records in Johnson County, Texas.	0.50	\$110.00	\$55.00
03/03/2023	CCK	Review Reply brief ISO appeal of Receivership order; review C. Thomas's emails regarding  ; call with C. Thomas to discuss ; call with the SEC regarding Rock Creek appeal; call with counsel for Southern Properties regarding request for extension on briefing schedule and motion for leave to intervene; confer with C. Thomas regarding same; review and revise letter responding to Max Barton's letter regarding retrieval of personal property; review C. Thomas edits to letter to Edney regarding Rock Creek transfers and accounting access data.	3.50	\$385.00	\$1,347.50
03/08/2023	CCK	Review Barton's response to fee petition; research ISO reply to objection to fee petition and draft summary of same for C. Thomas; review authorities received from Judge Hale regarding mediation and confer with C. Thomas regarding same; further review of mediation statement and additional authorities and confer with A. Carrillo regarding additional research ISO same related to good faith arguments and choice of law discussion; call with SEC appellate counsel regarding Rock Creek Appeal; confer with T. Wells regarding it confer with accountants regarding status of notice to the IRS; confer with T. Wells regarding	4.60	\$385.00	\$1,771.00
03/10/2023	CCK	Call with M. Ahuja to discuss tax issues related to returns for entities and QSF; emails with C.	1.40	\$385.00	\$539.00

Wells and S. Latham regarding same; call with C. Thomas to discuss  ; review list of entities for which we have no EIN and confer with T. Wells and S. Latham regarding  ; call with C. Thomas to discuss  03/10/2023 SRL Review bank productions and case files for Receivership Entities missing EIN numbers and update chart of same accordingly.  03/12/2023 TBW Research  Research case files for Tax EIN's to assist with preparations of tax extensions for Receivership entities.				<b>Quantity Subto</b>	otal	282.0
Wells and S. Latham regarding same; call with C. Thomas to discuss  ; review list of entities for which we have no EIN and confer with T. Wells and S. Latham regarding  ; call with C. Thomas to discuss   03/10/2023 SRL Review bank productions and case files for Receivership Entities missing EIN numbers and update chart of same accordingly.  03/12/2023 TBW Research  1.60 \$200.00 \$  03/15/2023 SRL Research case files for Tax EIN's to assist with preparations of tax extensions for Receivership	03/16/2023	SRL			\$110.00	\$297.00
Wells and S. Latham regarding same; call with C. Thomas to discuss ; review list of entities for which we have no EIN and confer with T. Wells and S. Latham regarding ; call with C. Thomas to discuss  03/10/2023 SRL Review bank productions and case files for Receivership Entities missing EIN numbers and update chart of same accordingly.	03/15/2023	SRL	preparations of tax extensions for Receivership	0.50	\$110.00	\$55.00
Wells and S. Latham regarding same; call with C. Thomas to discuss ; review list of entities for which we have no EIN and confer with T. Wells and S. Latham regarding ; call with C. Thomas to discuss  03/10/2023 SRL Review bank productions and case files for Receivership Entities missing EIN numbers and	03/12/2023	TBW	Research .	1.60	\$200.00	\$320.00
Wells and S. Latham regarding same; call with C. Thomas to discuss ; review list of entities for which we have no EIN and confer with T. Wells and S. Latham regarding	03/10/2023	SRL	Receivership Entities missing EIN numbers and	2.40	\$110.00	\$264.00
			Thomas to discuss ; review list of entities for which we have no EIN and confer with T. Wells and S. Latham regarding			

# **Sale of Bellwether Ridge Apartments**

Date	Initials	Description	Hours	Rate	Client Total
01/11/2023	JJM	Meet with C. Thomas regarding review of Purchase and Sale Agreement and begin revising accordingly.	0.90	\$275.00	\$247.50
01/11/2023	ATF	Meet with C. Thomas regarding review of Purchase and Sale Agreement.	0.70	\$500.00	\$350.00
01/13/2023	JJM	Finish revising Purchase and Sale Agreement consistent with changes from meeting with C. Thomas; research additional provisions regarding HUD approval; deliver updated draft to C. Thomas.	1.40	\$275.00	\$385.00
01/18/2023	JJM	Revise Purchase and Sale Agreement by updating broker commissions section and deliver to prospective buyer and C. Thomas.	0.40	\$275.00	\$110.00
02/02/2023	JJM	Prepare for and participate in phone call with L.	0.80	\$275.00	\$220.00

Subtotal

\$74,828.50

		Osterman and clients regarding issues with Purchase and Sale Agreement.			
02/09/2023 J	JJM	Prepare for and participate in phone call with C. Thomas regarding revisions to Purchase and Sale Agreement made by L. Osterman; revise Purchase and Sale Agreement accordingly and deliver to C. Thomas.	4.80	\$275.00	\$1,320.00
02/21/2023 J	JJM	Review Purchase and Sale Agreement for Parc at Windmill Farms; revise and deliver updated draft to L. Osterman and C. Thomas.	0.90	\$275.00	\$247.50
			Quantity Subtotal		9.9

# **Sale of Amerigold Suites**

Date	Initials	Description	Hours	Rate	Client Total
02/20/2023	JJM	Review and revise Purchase and Sale Agreement and deliver to C. Thomas.	3.40	\$275.00	\$935.00
02/27/2023	JJM	Review changes to Purchase and Sale Agreement by L. Osterman; deliver summary of key changes to C. Thomas for consideration prior to execution; update Purchase and Sale Agreement with updates to Buyer's Affiliate definition and deliver to L. Osterman.	0.40	\$275.00	\$110.00
03/02/2023	JJM	Deliver written update to L. Osterman regarding commencement of title commitment objection periods only following receipt of court approval and commencement or due diligence period.	0.20	\$275.00	\$55.00
03/23/2023	JJM	Phone call with L. Osterman, C. Thomas, and the Buyers for the Amerigold property regarding the Certificate of Occupancy and an update from the most recent court proceeding.	0.50	\$275.00	\$137.50

**Quantity Subtotal** 

4.5

Subtotal

**Subtotal** 

\$2,880.00

\$1,237.50

**Hours Total** 

929.4

Subtotal

\$235,794.00

**Client Total** \$235,794.00

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 75252
ABA # 113024164 Account # 30081159

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

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

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

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

# EXHIBIT D



2901 N. Dallas Pkwy Suite 320 Plano, TX 75093 Invoice # 8226.Bar

**Invoice Date:** 03/31/2023

**Due Date**: 4/30/2023

Bill To:

Brown Fox Law – Barton Receivership

Attn: Court Thomas

Date	ID	Description	Task	Hours	Amount
	MA	Access to 8 QuickBooks files; reconcile which files are missing	2900	3.00	\$975.00
01/03/23		from A&C account			,
04/04/02	SK	Reviewed list of 155 entities and detailed status of corresponding QuickBooks Online account	2900	2.30	\$345.00
01/04/23	SK	Verify access to 8 QuickBooks Online files	2900	0.20	\$30.00
01/05/23	MA	Review of QuickBooks access	2900	1.00	\$30.00
01/09/23	MA	Call with Receiver regarding tax and forensics	2900	0.30	\$97.50
01/10/23	MA	Call with Intuit for QuickBooks access	2900	0.50	\$162.50
01/11/23	MA	Verify QuickBooks access	2900	0.50	\$162.50
	SH	Receivership QuickBooks set up, Q4 2022 accounting	2900	1.40	\$385.00
01/12/23	MA	Call with Intuit for QuickBooks access	2900	1.00	\$325.00
01/13/23	KS	Amerigold - November and December account reconciliations	2900	2.00	\$300.00
01/13/23		Review of 33 entities for Barton to verify QuickBooks access			<u> </u>
01/13/23	SK	Preparation of Form 56	2900	0.80	\$120.00
01/16/23	AH	Review and updates for Q4 2022 accounting, related	3900	2.80	\$266.00
01/16/23	SH	correspondence	2900	1.50	\$412.50
01/17/23	SK	Meeting with team regarding Form 56	3900	1.30	\$195.00
01/17/23	AH	Meeting with team regarding Form 56 and preparation of Form 56	3900	1.90	\$180.50
01/17/23	MA	QuickBooks access follow up with Intuit	2900	1.00	\$325.00
	SH	Q4 2022 accounting review and Standard Fund Accounting	2900	2.00	\$550.00
01/17/23		Report preparation			<u>'</u>
01/18/23	AH	Preparation of Form 56	3900	1.90	\$180.50
01/18/23	SK	Review of Form 56	3900	0.80	\$120.00
01/19/23	SH	Finalize Q4 2022 Standard Fund Accounting Report for review	2900	0.50	\$137.50
01/20/23	AH	Preparation of Form 56	3900	3.50	\$332.50
01/25/23	SH	Call with Receiver to discuss various aspects of project	2900	0.30	\$82.50
	SH	Review of JMJ QuickBooks file for potential payroll and 1099	2900	1.00	\$275.00
01/25/23		information; calculation of 1099s from data received	2000	0.00	4222.00
01/26/23	SH	1099 calculations and summary	2900	0.80	\$220.00
01/30/23	SH	Update 1099 vendor information from additional information provided, send for review	2900	0.50	\$137.50

Date	ID	Description	Task	Hours	Amount
01/31/23	SH	Update vendor information with data received; prepare and file 1099s	2900	0.50	\$137.50
01/31/23	SH	Calls with Receiver to discuss General Ledger preparation, status of QuickBooks data		0.30	\$82.50
01/31/23	SH	Review data provided	2900	0.50	\$137.50
01/31/23	SH	Call with Mr. Thomas, Ms. Koonce, and Ms. Bedoya to discuss payroll and W-2 information, other potential QuickBooks related items	2900	0.50	\$137.50
02/03/23	KS	D4OP - Entered 3/2020 to 10/2022 bank statement transactions	2900	4.00	\$600.00
02/03/23	SH	Review of documents received, discussion on project, related planning	2900	0.80	\$220.00
02/06/23	KS	Completion of D4OP spreadsheet for Chase x1720 account.  Meeting with Ms. Huser to discuss progress	2900	5.00	\$750.00
02/06/23	SK	Review of Form 56	3900	2.40	\$360.00
02/06/23	SH	Call with Mr. Thomas to discuss documents received	2900	0.30	\$82.50
02/06/23	SH	Review documents received; discussion and planning with Ms. Sharp	2900	1.50	\$412.50
02/07/23	KS	Creation of spreadsheet to track the Opelika construction loan; begin entering construction draw data	2900	7.00	\$1,050.00
02/07/23	SH	Review documents provided; discussion on data	2900	0.80	\$220.00
02/08/23	KS	Review of the construction draw documents	2900	1.50	\$225.00
02/09/23	KS	Verified all soft cost payments that were issued to D4OP. Cross referenced with the Chase x1702 and JMJ Chase account	2900	7.00	\$1,050.00
02/09/23	SH	Call with Mr. Thomas to discuss new data received and project planning for D4OP	2900	0.30	\$82.50
02/09/23	SH	Update with Ms. Sharp after call with Mr. Thomas	2900	0.30	\$82.50
02/10/23	АН	Preparation of Form 56	3900	1.70	\$161.50
02/10/23	SK	Review of Form 56	3900	0.30	\$82.50
02/10/23	SH	Status update and review D4OP transaction activity for General Ledger and Trial Balance preparation	2900	2.00	\$550.00
02/13/23	KS	D4OP Reporting	2900	7.50	\$1,125.00
02/13/23	SK	Review of Form 56	3900	2.50	\$375.00
02/13/23	SH	Project update and discussion on status of D40P, treatment of transactions	2900	0.30	\$82.50
02/14/23	SK	Review of Form 56	3900	2.90	\$435.00
02/14/23	SH	Review of General Ledger	2900	0.50	\$137.50
02/14/23	АН	Preparation of Form 56	3900	1.10	\$104.50
02/14/23	SK	Review of QuickBooks Online access and compared to list of entities	2900	0.30	\$45.00
02/14/23	SK	Review of Form 56	3900	1.50	\$225.00
02/15/23	KS	Creation of D4OP General Ledger from bank statements and HUD construction advances	2900	7.00	\$1,050.00
02/15/23	SK	Review of Form 56	3900	2.30	\$345.00
02/15/23	SH	Review and discussion regarding General Ledger and updated information	2900	1.00	\$275.00
02/15/23	SH	Call with Gilbert Mowbray to discuss access to QuickBooks Online accounts	2900	0.50	\$137.50
02/15/23	АН	Preparation of Form 56	3900	0.50	\$47.50
02/15/23	SH	Checking updated access status	2900	0.30	\$82.50
	SH	Update call with Mr. Thomas	2900	0.20	\$55.00
	SH	Checking updated access status	2900	0.30	\$82

Date	ID	Description	Task	Hours	Amount
02/16/23	KS	Continue building D4OP General Ledger	2900	4.50	\$675.00
02/16/23	SH	Review of General Ledgers and related discussions	2900	1.00	\$275.00
02/17/23	KS	Continue building D4OP General Ledger	2900	7.00	\$1,050.00
02/17/23	SH	Review updates to General Ledger, discussion with staff on variances and format	2900	1.50	\$412.50
02/18/23	KS	Continue building D4OP General Ledger	2900	1.50	\$225.00
02/19/23	KS	Continue building D4OP General Ledger	2900	1.00	\$150.00
02/20/23	SH	Review, format and finalize draft reports for review	2900	3.50	\$962.50
02/20/23	SH	Download and review data file containing QB	2900	0.30	\$85.50
02/21/23	KS	Greystone Southern Partners General Ledger creation	2900	6.00	\$900.00
02/21/23	SH	Review General Ledger updates, to incorporate loan data	2900	2.00	\$550.00
02/22/23	SH	General Ledger: build and review; format report, related discussions	2900	1.50	\$412.50
02/23/23	KS	Review of JMJ QuickBooks Online for Pillar transactions	2900	8.30	\$1,245.00
02/23/23	SH	Review and discussion on updates to General Ledger build for additional data	2900	1.00	\$275.00
02/23/23	SH	Test access to Villita Towers LLC QuickBooks Online	2900	0.20	\$55.00
02/24/23	KS	Review of bank transactions for Opeilka entries	2900	2.50	\$375.00
02/24/23	SH	Testing QuickBooks files for access with various usernames and passwords found by Mr. Thomas	2900	0.30	\$82.50
02/27/23	SH	Review General Ledger; adjust formatting; tie-out calculations	2900	2.00	\$550.00
02/28/23	SH	Review, calculations and related discussions regarding Trial Balance and General Ledger for D4OP	2900	7.30	\$2,007.50
02/28/23	DK	Review of Form 56	3900	3.00	\$825.00
03/01/23	KS	Preparation of General Ledger	2900	6.00	\$900.00
03/01/23	DK	Review of Form 56	3900	2.00	\$550.00
03/02/23	KS	Preparation of General Ledger	2900	4.00	\$600.00
03/02/23	SH	D4OP General Ledger and Trial Balance - review, formatting to include all years	2900	4.00	\$1,100.00
03/02/23	DK	Preparation of federal extensions	3900	2.80	\$770.00
03/03/23	KS	Review of General Ledger	2900	1.00	\$150.00
03/03/23	DK	Preparation of federal extensions	3900	3.20	\$880.00
03/04/23	DK	Preparation of federal extensions	3900	1.50	\$412.50
03/06/23	KS	Test QuickBooks desktop files provided for access with various usernames/passwords	2900	3.00	\$450.00
03/06/23	DK	Preparation of federal extensions	3900	1.50	\$412.50
03/07/23	KS	Review of QuickBooks files from Receiver	2900	1.50	\$225.00
03/08/23	KS	Update General Ledger to include SPC Loan data	2900	4.50	\$675.00
03/08/23	KS	Updates to Profit and Loss	2900	0.50	\$75.00
03/08/23	DK	Preparation of federal extensions	3900	1.20	\$330.00
03/09/23	SH	Entity verification report formatting and review	2900	1.50	\$412.50
03/09/23	KS	Updates to General Ledger	2900	1.00	\$150.00
03/09/23	DP	Mailing and e-filing of Form 56 and federal extensions	3900	5.00	\$475.00
03/09/23	MA	Review of federal extensions, check source documents, multiple sources of information for EIN	3900	12.00	\$3,900.00
03/09/23	SK	Review of documents received to verify EINs	3900	6.40	\$960.00
03/09/23	SH	Review and update D4OP General Ledger and Trial Balance; related correspondence	2900	2.00	\$550.00

Date	ID	Description	Task	Hours	Amount
03/10/23	АН	Preparation of Form 56	3900	4.10	\$389.50
03/10/23	SK	Organization of data received	3900	8.30	\$1,245.00
03/10/23	DD	Organizing data base of all entities for extensions and Form 56	3900	4.30	\$408.50
03/10/23	MA	Continue review of federal extensions, check source documents, multiple sources of information for EIN	3900	6.00	\$1,950.00
03/12/23	DK	reparation of Form 56 and federal extensions. Along with QSF seearch		10.50	\$2,887.50
03/12/23	DK	Research the state of incorporation for 92 entities by searching Delaware and Texas SOS databases	3900	4.50	\$1,237.50
03/13/23	SH	General Ledger reports for D4DS and D4FR	2900	1.00	\$275.00
03/13/23	AH	Preparation of Form 56	2900	0.30	\$28.50
03/13/23	DD	Organizing data base of all entities for extensions and Form 56	3900	5.50	\$522.50
03/13/23	MA	Review of federal extensions	3900	9.00	\$2,925.00
03/13/23	SK	Verification of federal extensions created compared to court order and list of entities	3900	6.80	\$1,020.00
03/14/23	SK	Verification of federal extensions created compared to court order and list of entities	3900	7.50	\$1,125.00
03/14/23	DD	Mailing and e-filing of Form 56 and federal extensions	3900	7.00	\$665.00
03/14/23	MA	Review of federal extensions	3900	9.00	\$2,925.00
03/14/23	DP	Mailing and e-filing of Form 56 and federal extensions	3900	2.00	\$190.00
03/15/23	SH	Pulling reports from QuickBooks for D4DS and D4FR, per request	2900	0.50	\$137.50
03/15/23	AH	Preparation of Form 56	3900	0.50	\$47.50
03/15/23	MA	Check extension list - prep and review new extensions from entities on December order	3900	5.00	\$1,625.00
03/15/23	SK	Preparation of additional federal extensions	3900	0.70	\$105.00
03/15/23	SK	Verification of rejected e-filed extensions	3900	5.00	\$750.00
03/15/23	DP	Mailing and e-filing of Form 56 and federal extensions	3900	3.00	\$285.00
03/15/23	DK	Verification of EINs and list of entities from court order	3900	2.60	\$715.00
03/15/23	DK	Preparation of federal extensions	3900	1.50	\$412.50
03/16/23	SK	Creation of Form 56 and federal extensions for additional entities	3900	0.40	\$60.00
03/16/23	SH	General Ledger reports for Wall entities	2900	1.40	\$385.00
03/19/23	DK	Review of tax returns on file to verify activity and type of returns filed	3900	1.10	\$302.50
03/20/23	SK	Verification of all form 56 compared to court orders	3900	3.00	\$450.00
03/20/23	DK	List of all entities from court order and verified EINs and prior year returns	3900	4.10	\$1,127.50
03/20/23	SH	General Ledger report from QB files provided for D4OP; investigated entries in comparison to General Ledger build from bank statements and loan documents	2900	1.00	\$275.00
03/21/23	DK	Internal discussion with Ms. Kaur regarding additional Forms 56 that are needed. Review of additional Forms 56	3900	2.80	\$770.00
03/21/23	АН	Preparation of Form 56	3900	0.70	\$66.50
03/21/23	SK	Internal discussion with Mr. Kwande regarding additional Forms 56 that are needed	3900	0.40	\$60.00
03/22/23	MA	Prepare for meeting with the Receiver	3900	2.00	\$650.00
03/23/23	SH	Planning meeting	3900	1.00	\$275.00
03/23/23	SK	Review of Forms 56 that were sent to receiver	3900	3.70	\$555.00
03/23/23	SH	Meeting with Mr. Thomas to discuss project status	2900	1.00	\$275.00
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Date	ID	Description	Task	Hours	Amount
03/23/23	СВ	Meeting with Receiver, Mr. Thomas and A&C team to discuss tasks and respond to questions for Receivership	4900	1.00	\$325.00
03/23/23	СВ	Meeting with A&C team to discuss division of tasks based on meeting with Receiver	4900	1.00	\$325.00
03/23/23	MA	Meeting with Receiver and team to discuss action items	3900	2.00	\$650.00
03/23/23	SH	Check QuickBooks files for access/payroll information. HR Sterling still not available. Check/update QuickBooks index.	2900	0.80	\$220.00
03/24/23	KS	Review of documents on USB drive for bank statement files	2900	1.50	\$225.00
03/24/23	SK	Creation of additional Forms 56 for approved entities from Receiver	3900	2.20	\$330.00
03/28/23	SH	Testing access to QuickBooks files; HR Sterling - payroll data and associated reports	2900	1.50	\$412.50
03/28/23	DK	Reviewed entities with bank statement activity, compare with tax returns on file and compare with entity list	3900	3.20	\$880.00
03/28/23	СВ	Review inventory of bank statement information.	4900	0.40	\$130.00
03/29/23	СВ	Meeting with Mr. Cecil to discuss bank files and tracing activity for receivership	4900	0.50	\$162.50
03/29/23	TC	Meeting with Ms. Bremer to discuss bank files and tracing activity for receivership	4900	0.50	\$137.50
03/30/23	TC	Review and analysis of intercompany transactions for D4DS and D4FR along with all other Barton entities	4900	5.40	\$1,485.00
03/30/23	SH	W-2 preparation	2900	0.50	\$137.50
03/31/23	TC	Complete initial analysis of intercompany transaction for D4DS and D4FR and all other Barton entities and call with Ms. Bremer	4900	5.20	\$1,430.00
03/31/23	SH	W-2 preparation and filing	2900	1.50	\$412.50
03/31/23	СВ	Review of intercompany transactions and call with Mr. Cecil.	4900	0.40	\$130.00

Total \$77,153.50

Balance Due \$77,153.50



2901 N. Dallas Pkwy Suite 320 Plano, TX 75093 Invoice # 8226.Bar

**Invoice Date:** 03/31/2023

**Due Date**: 04/30/2023

Bill To:

Brown Fox Law – Barton Receivership

Attn: Court Thomas

#### **BILLING SUMMARY**

ID	TIMEKEEPER	TITLE	HOURS	RATE	AMOUNT
AH	Ammon Hall	Jr. Associate	19.00	\$95.00	\$1,805.00
СВ	Carolyn Bremer	Engagement Leader	3.30	\$325.00	\$1,072.50
DD	Deborah Denison	Administrative Staff	16.80	\$95.00	\$1,596.00
DK	Devon Kwande	Manager	45.50	\$275.00	\$12,512.50
DP	Dawn Peterson	Administrative Staff	10.00	\$95.00	\$950.00
KS	Kelly Sharp	Associate	94.80	\$150.00	\$14,220.00
MA	Madhu Ahuja	Engagement Leader	52.30	\$325.00	\$16,997.50
SH	Stacey Huser	Manager	56.90	\$275.00	\$15,647.50
SK	Shamsher Kaur	Associate	62.00	\$150.00	\$9,300.00
TC	Tony Cecil	CPA/CFE	11.10	\$275.00	\$3,052.50

TOTAL 371.70 \$77,153.50



2901 N. Dallas Pkwy Suite 320 Plano, TX 75093 Invoice # 8226.Bar

**Due Date**: 04/30/2023

**Invoice Date:** 03/31/2023

Bill To:

Brown Fox Law – Barton Receivership

Attn: Court Thomas

#### **TASK SUMMARY**

TASK	TASK DESCRIPTION	HOURS	AMOUNT
2900	Accounting/Auditing	162.60	\$32,780.00
3900	Tax Issues	195.10	\$40,378.50
4900	Forensic Accounting	14.00	\$3,995.00

TOTAL 371.70 \$77,153.50



2901 N. Dallas Pkwy Suite 320 Plano, TX 75093 Invoice # 8226.Bar

**Invoice Date:** 03/31/2023

**Due Date**: 4/30/2023

Bill To:

Brown Fox Law – Barton Receivership

Attn: Court Thomas

#### **Expense Reimbursement**

DATE	DESCRIPTION	QUANTITY	RATE	AMOUNT
1/31/2023	1099 Filing Fees for Goldmark Hospitality LLC	1.00	\$6.46	\$6.46
2/15/2023	Intuit Reimbursement – D4AT LLC	1.00	\$90.61	\$90.61
2/15/2023	Intuit Reimbursement – 2999TC Acquisition LLC	1.00	\$90.61	\$90.61
2/15/2023	Intuit Reimbursement – AVG West LLC	1.00	\$90.61	\$90.61
2/15/2023	Intuit Reimbursement – Ridgeview Addition LLC	1.00	\$90.61	\$90.61
2/28/2023	Intuit Reimbursement – JMJ Development LLC	1.00	\$213.20	\$213.20
3/14/2023	Certified Mailing of extensions	1.00	\$125.88	\$125.88
3/15/2023	Certified Mailing of extensions	1.00	\$46.53	\$46.53
3/16/2023	Certified Mailing of extensions	1.00	\$27.00	\$27.00
3/16/2023	Mileage for USPS to mail extensions	1.00	\$5.90	\$5.90
3/15/2023	Intuit Reimbursement – 2999TC Acquisition LLC	1.00	\$90.61	\$90.61
3/15/2023	Intuit Reimbursement – AVG West LLC	1.00	\$90.61	\$90.61
3/15/2023	Intuit Reimbursement – D4AT LLC	1.00	\$90.61	\$90.61
3/15/2023	Intuit Reimbursement – Ridgeview Addition LLC	1.00	\$90.61	\$90.61
3/31/2023	W2 Filing Fees	1.00	\$25.85	\$25.85

TOTAL \$1,175.70

# EXHIBIT E

#### Veracity Forensics LLC

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



#### **INVOICE**

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

 DATE
 01/31/2023

 TERMS
 Due on receipt

 DUE DATE
 01/31/2023

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INVOICE

REFERENCE TX LICENSE VF PROJECT
Confidnt'l: Barton Receivershp A22974701 20221019-D01-BTR

DESCRIPTION	QTY	RATE	AMOUNT
Forensic Image of External Storage Thumbdrives (011, 014, 015, 016, 017, 018, 019, 028, and 029)	9	500.00	4,500.00T
Forensic Image Windows Computer Dell OptiPlex Desktop (010, 020, 021)	3	750.00	2,250.00T
Analyst Time Took possession of the various physical devices located at Barton's former office off Turtle Creek, remove HD from MFP device (036), new devices from Barton's office were identified and inventoried, all evidence items entered in evidence tracking system, call with Bryan at Simplex to see if the HD in the second MFP they picked up had been wiped, working copies captured of (010, 011, 014, 015, 016, 017, 018, 019, 020, 021, 028 and 029)	10.50	285.00	2,992.50T
Receiver Discount (12%)	1	-1,169.10	-1,169.10T
	SUBTOTA	AL	8,573.40
	TAX		707.31
	TOTAL		9,280.71
	BALANC	E DUE	\$9,280.71

#### Veracity Forensics LLC

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



#### **INVOICE**

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

REFERENCE TX LICENSE VF PROJECT
Barton Receivership A22974701 20221019-D01-BTR

DESCRIPTION	QTY	RATE	AMOUNT
Forensic Image of Windows Computer 12 Dell DT, 022 HP DT, 023a, 023b, 023c, 023d. MSI computer with 4 internal drives, 026 Dell DT, 032 HP DT, 033 Dell DT, 034 Dell DT,	10	750.00	7,500.00T
Forensic Copy CD/DVD 035a, 035b, 035c, 035d, 035e, 039a-039u	26	50.00	1,300.00T
Forensic Collection External HD 037 Data Traveler TD, 038 SanDisk SD	2	500.00	1,000.00T
Analyst Time Evidence management, verifying various TDs are empty, searching for PW's on 012	5.25	285.00	1,496.25T
Receiver Discount (12%)	1	-1,355.55	-1,355.55
	SUBTO	TAL	9,940.70
	TAX		931.94
	TOTAL		10,872.64
	BALAN	CE DUE	\$10,872.64

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#### **Veracity Forensics LLC**

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



#### **INVOICE**

BILL TO
Barton Receivership
8111 Preston Rd., Suite 300
Dallas, TX 75225

 INVOICE
 710

 DATE
 03/31/2023

 TERMS
 Due on receipt

 DUE DATE
 03/31/2023

REFERENCE TX LICENSE
Barton Receivership A22974701

VF PROJECT 20221019-D01-BTR

	TOTAL		\$791.04
	TAX TOTAL		60.29 791.04
	SUBTO	TAL	730.75
Courier Fee	1	33.75	33.75T
Two thumb drives for deliverables	1	70.00	70.00T
Receiver Discount (12%)	-1	85.50	-85.50T
Analyst Time Custom folder search 12, export from 012 "OneDrive -Jmj Holdings, LLC" folder	2.50	285.00	712.50T
DESCRIPTION	QTY	RATE	AMOUNT