

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

**UNITED STATES SECURITIES
AND EXCHANGE COMMISSION,**

Plaintiff,

V.

THE HEARTLAND GROUP VENTURES, LLC; HEARTLAND PRODUCTION AND RECOVERY LLC; HEARTLAND PRODUCTION AND RECOVERY FUND LLC; HEARTLAND PRODUCTION AND RECOVERY FUND II LLC; THE HEARTLAND GROUP FUND III, LLC; HEARTLAND DRILLING FUND I, LP; CARSON OIL FIELD DEVELOPMENT FUND II, LP; ALTERNATIVE OFFICE SOLUTIONS, LLC; ARCOOIL CORP.; BARRON PETROLEUM LLC; JAMES IKEY; JOHN MURATORE; THOMAS BRAD PEARSEY; MANJIT SINGH (AKA ROGER) SAHOTA; and RUSTIN BRUNSON,

Defendants,

and

DODSON PRAIRIE OIL & GAS LLC; PANTHER CITY ENERGY LLC; MURATORE FINANCIAL SERVICES, INC.; BRIDY IKEY; ENCYIPHER BASTION, LLC; IGROUP ENTERPRISES LLC; HARPRIT SAHOTA; MONROSE SAHOTA; SUNNY SAHOTA; BARRON ENERGY CORPORATION; DALLAS RESOURCES INC.; LEADING EDGE ENERGY, LLC; SAHOTA CAPITAL LLC; and 1178137 B.C. LTD.,

Relief Defendants.

No. 4-21CV-1310-O-BP

**RECEIVER'S FEE APPLICATION FOR SERVICES PERFORMED BETWEEN
OCTOBER 1, 2024 AND DECEMBER 31, 2024, AND BRIEF IN SUPPORT**

TO THE HONORABLE UNITED STATES MAGISTRATE JUDGE HAL R. RAY, JR.:

Pursuant to the *Order Approving Employment of Dykema Gossett PLLC as Counsel to the Receiver Effective as of December 3, 2021* [ECF No. 19] (the “Dykema Employment Order”), the *Order Approving Employment of Rose L. Romero of the Law Offices of Romero / Kozub as Local Counsel to Receiver Effective December 3, 2021* [ECF No. 24] (the “Romero Employment Order”), the *Order* [ECF No. 87] (the “Jones Employment Order”) approving the *Application to Employ Law Practice of Darrell R. Jones, PLLC as Counsel to Receiver Effective December 2, 2021*, the *Order* [ECF No. 106] (the “Palmour Employment Order”) approving the *Application to Employ Vicki Palmour Consulting, LLC as Oil and Gas Consultant to Receiver Effective January 1, 2022*, the *Order* [ECF No. 180] (the “Ahuja Employment Order”) approving the *Application to Employ Ahuja & Clark, PLLC as Accountants to Receiver Effective April 1, 2022*, and the *Order* [ECF No. 331] (the “Stretto Employment Order”) approving the *Receiver's Application to Employ Bankruptcy Management Solutions Inc. d/b/a Stretto as Claims and Disbursement Agent*, Deborah D. Williamson, in her capacity as the Court-appointed Receiver (the “Receiver”) for the Receivership Parties (as defined in the *Order Appointing Receiver* [ECF No. 17] (the “Receivership Order”))¹ and receivership estates (collectively, the “Receivership Estates”) in the above-captioned case (the “Case” or the “Receivership”), hereby submits this *Receiver's Fee Application for Services Performed Between October 1, 2024 and December 31, 2024, and Brief in Support* (the “Application”) of Deborah D. Williamson, as Receiver, Dykema Gossett PLLC (“Dykema”), Rose L. Romero with the Law Offices of Romero | Kozub

¹ Capitalized terms used herein but not otherwise defined shall have the meaning ascribed in the Receivership Order or the Eleventh Report (as defined herein).

(“Romero”), the Law Practice of Darrell R. Jones, PLLC (“Jones”), Ahuja & Clark, PLLC n/k/a Ahuja & Consultants, Inc. (“Ahuja”),² and Stretto, Inc. (“Stretto”). In support of the Application, the Receiver respectfully states as follows:

I. OVERVIEW

1. As more fully detailed in the *Amended Receiver’s Thirteenth Quarterly Report for Receivership Estates (October 1, 2024 - December 31, 2024)* [ECF No. 668] (the “Thirteenth Report”), the Receiver, with the assistance of her Retained Personnel, spent a substantial amount of time on the distribution process, focusing on communications with various creditors, including investors (potential and known), vendors, and governmental agency contacts. The Receiver also sold the last known items of personal property pursuant to Court-approved sale procedures [ECF No. 580]. Additionally, the Receiver and her team continue to analyze various records relating to other potential assets and/or claims of the Estates.

2. The Receiver’s third-party escheatment contractor completed the escheatment process for royalty payments during the Application Period (as defined below). A substantial amount of time was spent in the fourth quarter of 2024 on the Court-approved claims procedure, focusing on communications with various creditors, including investors (potential and known), vendors, and governmental agency contacts, identifying entities under which the Receivership which can be terminated, and the termination of Receivership entities.

3. Communications with investors, vendors, and other creditors steadily increased throughout the Application Period as Locke Lord settlement and distribution packages were delivered to investors and known non-investor creditors. The Receiver and her team continued daily communications with investors (known and potential), vendors, creditors, and other

² Effective January 25, 2024, Ahuja changed its name to “Ahuja & Consultants, Inc.”

stakeholders via email regarding Case status and the claims procedure. The website (www.heartlandreceivership.com) is continuously updated with key court documents, notices, and reports.

4. The Receiver remains very cognizant of the need to balance performance of her duties with costs. Comparing this Application Period to the prior, the Receiver's hours decreased from 121.80 in the third quarter of 2024 to 114.30 hours in this Application Period; Dykema's hours decreased from 439.30 in the third quarter of 2024 to 426.30 hours in this Application Period. Dykema has voluntarily reduced the requested reimbursement by \$32,615.50 including time spent by the Receiver and by Dykema attorneys during the Application Period.

5. At the beginning of the fourth quarter of 2024, the Receiver had \$9,222,154.03 on deposit. At the end of the fourth quarter of 2024, the amount on deposit was \$3,590,061.74 after issuance of Court-approved distributions, and payments of operating expenses and Court-approved fees and expenses.³ As of the filing of this Application (February 4, 2025), \$3,000,890.70 is in the Receivership bank accounts.

II. RELIEF REQUESTED

6. This Application seeks authorization from the Court to pay on an interim basis fees and expenses for professional services performed from October 1, 2024 through December 31, 2024 (the "Application Period"), by the Receiver in the amount of \$77,152.50 for fees; Dykema, as lead counsel to the Receiver, in the amount of \$135,422.32 for fees and in the amount of \$8,275.45 for expenses; Romero, as local counsel to the Receiver, in the amount of \$1,870.00 for fees; Jones, as oil and gas transactional counsel to the Receiver, in the amount of

³ This balance includes checks from the October, November, and December distribution which have not been cashed by investors.

\$1,430.00 for fees; Ahuja, as tax and forensic accountants to the Receiver, in the amount of \$81,206.00 for fees and in the amount of \$172.93 for expenses; and Stretto, as claims and disbursement agent to the Receiver, in the amount of \$38,496.00 for fees and in the amount of \$1,061.14 for expenses. The Receiver respectfully requests this Court enter the proposed order attached hereto as **Exhibit B**, approving this Application on an interim basis, and authorizing the Receiver to pay outstanding amounts approved thereunder.

7. The Receivership Order at ¶ 62 requires that the “Receiver and Retained Personnel shall apply to the Court for compensation and expense reimbursement from the Receivership Estates” within forty-five (45) days of the end of each calendar quarter. Thus, this Application covers October 1, 2024 through December 31, 2024.

III. GENERAL BACKGROUND

8. This Application is submitted in accordance with the Receivership Order, the local rules of this Court, and the *Billing Instructions for Receivers in Civil Actions Commenced by the United States Securities and Exchange Commission* (the “Commission Billing Instructions”), and other applicable orders of this Court. The Receiver, Dykema, Romero, Jones, Ahuja, and Stretto have previously submitted fee applications to this Court in this Case. *See generally* ECF Nos. 132, 198, 245, 280, 334, 361, 386, 427, 453, 540, 601. Through the third quarter of 2024, the Receiver, Dykema, Romero, Jones, Ahuja, and Stretto have been paid on an interim basis for services performed on behalf of the Receiver in this Case, all to the extent authorized by this Court. *See generally* ECF Nos. 163, 216, 259, 265, 290, 348, 372, 407, 439, 460, 554, 601. The Receiver submitted this Application to the Commission (as defined below) for review prior to submission to the Court.

A. Procedural History

9. On December 1, 2021 (the “Commission Application Date”), Plaintiff, the Securities and Exchange Commission (the “Commission”), filed its application for the appointment of a receiver for the Receivership Parties (the “Commission Application”).

10. In its *Complaint*, the Commission alleges that this Case “concerns an oil and gas offering fraud conducted over three years.” *See* ECF No. 1, at ¶ 1. Further, the Commission’s *Complaint* alleges that various Defendants “fraudulently raised approximately \$122 million from more than 700 investors nationwide, purportedly for working over existing wells or drilling new wells in Texas, through five unregistered securities offerings[.]” *Id.*

11. On December 2, 2021, this Court determined that entry of an order appointing a receiver over the Receivership Parties was both necessary and appropriate to marshal, conserve, hold, and operate all of the Receivership Parties’ assets pending further order of this Court. Accordingly, the Court entered the Receivership Order on December 2, 2021, appointing Deborah D. Williamson of Dykema as the Receiver over the Receivership Estates in this Case.

12. The Receivership Order directs the Receiver to retain Romero as local counsel. *See* Receivership Order at ¶ 2. Accordingly, the Receiver engaged Romero on December 3, 2021, and has employed Romero on matters beyond local counsel, including obtaining advice on matters related to the Commission and the relief sought by the Commission.

13. Further, the Receivership Order authorizes the Receiver to “engage and employ persons in the Receiver’s discretion to assist the Receiver in carrying out the Receiver’s duties and responsibilities[.]” *Id.* at ¶ 8(H). Thus, the Receiver engaged Dykema as her lead counsel on December 3, 2021, and Jones as her oil and gas transactional counsel effective on the same date.

14. On December 3, 2021, the Receiver filed under seal her *Application to Employ Dykema Gossett PLLC as Counsel to Receiver Effective as of December 3, 2021* [ECF No. 18] (the “Dykema Application”). As detailed in the Dykema Application, the Receiver agreed to significantly discounted rates for Dykema professionals through 2022 in this Case.⁴ Dykema has agreed to keep the discounted rates until further notice.

15. On December 6, 2021, this Court entered the Dykema Employment Order [ECF No. 19].

16. On December 7, 2021, the Receiver filed under seal her *Application to Employ Law Offices of Romero / Kozub as Local Counsel to Receiver Effective as of December 3, 2021* [ECF No. 21] (the “Romero Application”). Ms. Romero also discounted her hourly rate in this Case.

17. On the same date, the Receiver filed under seal her *Application to Employ Law Practice of Darrell R. Jones, PLLC as Counsel to Receiver Effective as of December 2, 2021* [ECF No. 22] (the “Jones Application”). As detailed in the Jones Application, Mr. Jones discounted his standard hourly rate in this Case, which is an additional discount to the Receivership Estates.

18. On December 8, 2021, the Court entered the Romero Employment Order [ECF No. 24] and the *Order Approving Plaintiff United States Securities and Exchange Commission’s Motion to Unseal Case* [ECF No. 23], unsealing the docket in this Case.

⁴ The Receiver’s standard hourly rate for 2021 was \$840.00, the Receiver’s standard hourly rate for 2022 was \$880.00, the Receiver’s standard hourly rate for 2023 was \$950.00, and the Receiver’s standard hourly rate for 2024 is \$980.00. Dykema members’ and senior counsels’ standard hourly rates ranged from \$425.00-\$925.00 for 2021, \$425.00-\$1,400.00 for 2022, and \$470.00-\$1,400.00 for 2023. Dykema members’ and senior counsels’ standard hourly rates range from \$515.00-\$1,095.00 for 2024. Dykema associates’ and senior attorneys’ standard hourly rates ranged from \$370.00-\$505.00 for 2021, \$395.00-\$530.00 for 2022, and \$395.00-\$610.00 for 2023. Dykema associates and senior attorneys’ standard hourly rates range from \$435.00-\$625.00 for 2024.

19. Also on December 8, 2021, the Court entered an Order directing the Receiver to “file additional information regarding Jones’s application.” *See* ECF No. 26. In response, the Receiver filed a supplemental reply in support of the Jones Application. *See generally* ECF No. 31.

20. On December 27, 2021, the Receiver filed a second supplemental reply in support of the Jones Application. *See generally* ECF No. 67.

21. After considering the Jones Application at the January 4, 2022 hearing, this Court entered the Jones Employment Order [ECF No. 87].

22. On April 6, 2022, the Receiver filed her *Application to Employ Ahuja & Clark, PLLC as Accounts to Receiver Effective as of April 1, 2022* [ECF No. 179] (the “Ahuja Application”).

23. After considering the Ahuja Application at the April 22, 2022 hearing, this Court entered the Ahuja Employment Order [ECF No. 187].

24. On December 20, 2022, the Receiver filed her *Receiver’s Application to Employ Bankruptcy Management Solutions Inc. d/b/a Stretto as Claims and Disbursement Agent* [ECF No. 302] (the “Stretto Application”).

25. On February 10, 2023, after considering the Stretto Application at the February 9, 2023 hearing, this Court entered the Stretto Employment Order [ECF No. 331].

B. Work Performed During the Application Period

26. Since the beginning of this Case, the tasks and challenges presented have been numerous and, in many instances, novel, complex, and time-consuming. The efforts of the Receiver and her Retained Personnel during the Application Period resulted in several successful

negotiations and settlements in this Case, execution of the Court-approved claims procedure, and tangible progress towards a distribution to investors and other creditors, as evidenced herein.

27. The Receiver incorporates by reference the *Receiver's First Quarterly Report for Receivership Estates* [ECF No. 126], the *Receiver's Second Quarterly Report for Receivership Estates* [ECF No. 189], the *Receiver's Third Quarterly Report for Receivership Estates* [ECF No. 242], the *Receiver's Fourth Quarterly Report for Receivership Estates* [ECF No. 274], the *Receiver's Fifth Quarterly Report for Receivership Estates* [ECF No. 320], the *Receiver's Sixth Quarterly Report for Receivership Estates* [ECF No. 350], the *Receiver's Seventh Quarterly Report for Receivership Estates* [ECF No. 380], the *Receiver's Eighth Quarterly Report for Receivership Estates* [ECF No. 426], the *Receiver's Ninth Quarterly Report for Receivership Estates* [ECF No. 452], the *Receiver's Tenth Quarterly Report for Receivership Estates* [ECF No. 496], *Receiver's Eleventh Quarterly Report for Receivership Estates* [ECF No. 571], and *Receiver's Twelfth Quarterly Report for Receivership Estates* [ECF No. 601] (together, the "Receiver's Quarterly Reports") for information regarding the case status, as required by the Commission Billing Instructions and the Receivership Order.

28. Generally, the bulk of Dykema's services rendered during the Application Period included drafting pleadings, notices, and other documents and appearing before the Court at various hearings; analyzing investor documentation; preparing for the October 17, 2024 and December 27, 2024 disbursement; assisting the Receiver with mitigation of risks; dissolution of Receivership Entities; and responding to a substantial number of investors, particularly relating to the claims procedure and related notices, including distribution methodology and plan, status of distribution checks, and overall status of the case. Dykema did not charge the Receivership

Estates for time preparing this Application or the underlying billing statements. A summarized description of Dykema's services during the Application Period is detailed below.

29. Romero's services rendered during the Application Period included preparation for and attendance at hearings before this Court and communications with the Receiver and Dykema regarding claim and settlement items.

30. Jones's services rendered during the Application Period included escheat and land updates; coordination with the escheatment contractor; and communications with the Receiver and Dykema regarding post-abandonment issues.

31. Ahuja's services rendered during the Application Period included finalizing and submitting federal tax returns for certain Receivership Parties with filing obligations; calculating expense allocations for various Receivership Parties; assisting the Receiver and her counsel in responding to various notices received from the Internal Revenue Service (the "IRS"); performing detailed analysis of fund transfers and use of funds from Barron Petroleum LLC and ArcoOil Corp.; analyzing which entities under receivership can be terminated; analyzing and calculating potential exposure for the Receiver due to overdue payroll and income tax returns from periods prior to the establishment of the Receivership; and tracing funds relating to the purchase of the Bahamas properties and preparing documentation on same.

32. Stretto's services rendered during the Application Period included reviewing and reconciling claim submissions and supporting documentation, if any, for investor and non-investor claimants; maintaining and updating of the claims database; processing claim materials and preparing claims reports for the Receiver and her counsel; preparing and revising investor and non-investor matrices; processing completed and signed IRS Form W-9s of investor

creditors; and, creating distribution packages including processing checks to send to investor and non-investor creditors.

C. Fees and Expenses Summary During the Application Period

33. Through this Application, Dykema seeks approval on an interim basis for fees and expenses incurred by the Receiver and other Dykema professionals. Dykema expended an aggregate of 426.30 hours on this Case during the Application Period. At Dykema's discounted hourly rates and after other voluntary reductions, Dykema's fees for the Application Period total \$135,422.32 and expenses incurred in connection with services performed on behalf of the Receiver during the Application Period total \$8,275.45.⁵

34. The Receiver expended an aggregate of 114.30 hours on this Case during the Application Period. The Receiver's fees for the Application Period total \$77,152.50.

35. Romero reported an aggregate of 4.40 hours on this Case during the Application Period. At Romero's hourly rate of \$425.00 per hour, Romero's fees for the Application Period total \$1,870.00. Romero did not incur any expenses during the Application Period.

36. Jones expended an aggregate of 8.30 hours on this Case during the Application Period. At Jones's discounted standard hourly rate of \$325.00 per hour for all counsel, Jones's fees for the Application Period total \$2,675.50. Jones did not incur any expenses during the Application Period.

37. Ahuja expended an aggregate of 350.38 hours on this Case during the Application Period. Ahuja's fees for the Application Period total \$81,206.00, and Ahuja's fees for the Application Period total \$172.93. Ahuja's fees for the Application Period total \$81,378.93.

⁵ Dykema advanced expenses for the benefit of the Receivership Estates. Details for expenses of Dykema during the Application Period can be found on the Dykema invoice attached hereto as **Exhibit E-1**. Dykema does not charge for photocopy projects of less than 10 pages.

38. Stretto expended an aggregate of 181.60 hours on this Case during the Application Period. Stretto's fees for the Application Period total \$38,496.00, and Stretto's expenses incurred in connection with services performed on behalf of the Receiver during the Application Period total \$1,061.14. Stretto's fees for the Application Period total \$39,557.14.

IV. RECORDS SUPPORTING THIS APPLICATION

39. No agreement or understanding, written or oral, express, or implied, exists between Dykema, Romero, Jones, Ahuja, or Stretto and any other person or entity concerning the amount of compensation paid or to be paid from the Receivership Estates, or any sharing thereof, for services rendered in connection with this Case.

40. The Receiver, Dykema, Romero, Jones, Ahuja, and Stretto kept contemporaneous time records on a daily basis and tracked their billings on a tenth-of-an-hour basis with time charges allocated accordingly.

41. All services performed by Dykema, Romero, Jones, Ahuja, and Stretto were performed for and on the behalf of the Receiver and not on behalf of any other individual or entity. Dykema's, Romero's, Jones's, Ahuja's, and Stretto's services have been substantial, necessary, and beneficial to the Receiver and the Receivership Estates.

42. Dykema, Romero, Jones, Ahuja, and Stretto have maintained written records of the time expended in the rendition of professional services to the Receiver. The Receiver has also maintained written records of the time expended in the rendition of professional services in this Case. Attached hereto as **Exhibit C** is the *Summary of Fees by Timekeeper*, which summarizes the time and fees of the professionals of each firm who performed services on behalf of the Receiver during the Application Period. The total amount represents the amount of time expended by each professional at the respective firm multiplied by the applicable hourly rate.

43. In addition, Dykema, Romero, Jones, Ahuja, and Stretto have categorized their services by task. Attached hereto as **Exhibit D** is the *Summary of Fees by Task for All Matters*, which summarizes the number of hours incurred relative to each task category for each firm during the Application Period. It contains individualized and detailed descriptions of the daily services rendered and the hours expended by the professionals employed on behalf of the Receiver in this Case. During this Application Period, Dykema incurred \$8,275.45 in expenses in connection with the rendition of services on behalf of the Receiver, Ahuja incurred \$172.93 in expenses in connection with the rendition of services on behalf of the Receiver, and Stretto incurred \$1,061.14 in expenses in connection with the rendition of services on behalf of the Receiver. The Receiver, Romero, and Jones did not incur any expenses during the Application Period.

44. Attached hereto as **Exhibit E-1** is the invoice of Dykema, with Dykema's travel separated out. Attached hereto as **Exhibit E-2** is the invoice of Romero during the Application Period. Attached hereto as **Exhibit E-3** is the invoice of Jones during the Application Period. Attached hereto as **Exhibit E-4** is the invoice of Ahuja during the Application Period. Attached hereto as **Exhibit E-5** is the invoice of Stretto during the Application Period. The Receiver has reviewed and approved these time records, and based on the complexity and novelty of issues presented (some of which are of first impression for this Court) in this Case, the Receiver respectfully submits that the requested compensation is reasonable.

45. Dykema, Romero, Jones, Ahuja, and Stretto have worked to keep the number of professionals involved in this Case to a minimum at all stages to: (a) maximize familiarity with various issues and avoid duplication of efforts; (b) employ special expertise in a given field or

area; and (c) maximize economic use of professionals consistent with sound representation and supervision.

V. STANDARDIZED FUND ACCOUNTING REPORT

46. Dykema attorneys assisted the Receiver in the continued recovery of Receivership Assets and the disbursement of funds in the ordinary course of the Receivership Parties' businesses in accordance with the Receivership Order. A copy of the *Standardized Fund Accounting Report* prepared by Ahuja for the Application Period of the Receivership Estates is attached hereto as **Exhibit A** in compliance with the Commission Billing Instructions.

VI. BRIEF IN SUPPORT OF APPLICATION

47. The Receivership Order directs the Receiver's Retained Personnel (as defined in the Receivership Order) to apply for compensation and expense reimbursement from the Receivership Estates "[w]ithin forty-five (45) days after the end of each calendar quarter." Receivership Order, at ¶ 62. Accordingly, the Receiver files this Application and requests that the Court approve the fees for services performed by the Receiver, Dykema, Romero, Jones, Ahuja, and Stretto and any expenses incurred during the Application Period.

48. Under governing law, following a determination that services were rendered and costs were expended in furtherance of the Case, the Court may award compensation for the presented fees based on the lodestar method of calculation. *See SEC v. EFS, LLC*, No. 3:06-CV-1097-M, 2007 WL 649008, at *13 (N.D. Tex. Jan. 24, 2007) (internal citations omitted). Under the lodestar method, "a party seeking an award of attorney's fees has the burden of proving the reasonableness of the hours expended and the rates charged, and the district court must be able to determine the reasonable number of hours expended and the reasonable hourly rate for each participating attorney." *SEC v. Megafund Corp.*, No. 3:05-CV-01328-L, 2006 WL 42367, at *4 (N.D. Tex. Jan. 9, 2006). When determining whether the time spent, services performed,

expenses incurred, and hourly rates charged are reasonable and necessary under the factors set forth by the Fifth Circuit, courts consider: (1) the time and labor required for the litigation; (2) the novelty and complication of the issues; (3) the skill required to properly litigate the issues; (4) whether the attorney was precluded from other employment by acceptance of the case; (5) the attorney's customary fee; (6) whether the fee is fixed or contingent; (7) whether the client or the circumstances imposed time limitations; (8) the amount involved and the results obtained; (9) the experience, reputation, and ability of the attorney; (10) the "undesirability" of the case; (11) the nature and length of the attorney-client relationship; and (12) awards in similar cases. *Johnson v. Ga. Hwy. Express, Inc.*, 488 F.2d 714, 717–19 (5th Cir. 1974); *see, e.g., SEC v. Millennium Bank, et al.*, No. 7:09-CV-00050-O (ECF Nos. 193, 197, 296); *SEC v. Megafund Corp.*, 2008 WL 2839998, at *2 (N.D. Tex. June 24, 2008); *SEC v. Funding Res. Grp.*, 3:98-CV-02689-M, 2003 WL 145411, at *1 (N.D. Tex. Jan. 15, 2003). In applying the *Johnson* factors, the district court should explain its findings and the reasons upon which an award is based, but "it is not required to address fully each of the 12 factors." *Curtis v. Bill Hanna Ford, Inc.*, 822 F.2d 549, 552 (5th Cir. 1987) (citation omitted). This examination of reasonable and necessity should take into account all of the circumstances surrounding the case. *See SEC v. W.L. Moody & Co., Bankers (Unincorporated)*, 374 F. Supp. 465, 480 (S.D. Tex. 1974), *aff'd*, 519 F.2d 1087 (5th Cir. 1975). The court should analyze the fees and expenses relative to each receivership case. *See SEC v. Tanner*, No. 05-04057, 2007 WL 2013606, at *3 (D. Kan. May 22, 2007).

49. The complexity and difficulty associated with the receivership case are highly relevant factors in determining the reasonableness of professional fees. *See W.L. Moody & Co.*, 374 F. Supp. at 484; *SEC v. Fifth Ave. Coach Lines, Inc.*, 364 F. Supp. 1220, 1222 (S.D.N.Y. 1973). Since the inception of this Case, the Receiver and her team have had to conduct their

work without meaningful assistance from nearly all of the Defendants and Relief Defendants, exacerbated by the inability to access the various Receivership Parties' accounting and regulatory books, records, and software. The Receiver and her Retained Personnel have spent significant time and resources attempting to narrow and resolve various state and federal governmental agency issues, mostly notably resolving the RRC's claims with Court approval and attempting to narrow the issues involving the IRS.

50. The Receiver and her Retained Personnel diligently worked on and spent substantial time during the Application Period on the Court-approved claims procedure, the Initial Distribution, the October 17, 2024 distribution, and the December 27, 2024 distribution. Dykema updated the Receivership's website "Claims Process" and "Key Court Documents" pages with relevant information relating to the claims procedure and distribution process on a rolling basis. Ms. Douglas spoke to approximately 69 investors via telephone during the Application Period on inquiries relating to the claims procedure and/or transaction schedules, distribution status, and the Receiver's distribution methodology and plan. Ms. Adrianna Lafuente and Ms. Douglas primarily communicated with investors via email regarding distribution checks during this Reporting Period. Dykema continued to respond to correspondence from investors and non-investor creditors on the claims procedure and distribution plan during the Application Period.

51. The degree of success or recovery achieved in solving the issues presented in a receivership case should be considered when calculating the fees awarded. *See Johnson*, 488 F.2d at 718; *W.L. Moody & Co.*, 374 F. Supp. at 484–85; *Fifth Ave. Coach Lines, Inc.*, 364 F. Supp. at 1222. The application must prove the exercise of billing judgment in calculating the hours expended. *See SEC v. AmeriFirst Funding, Inc.*, No. 3:07-CV-0118-D, 2008 WL 2185193,

at *7 (N.D. Tex. May 7, 2008) (internal citations omitted). “Billing judgment requires documentation of the hours charged[.]” *Id.* The Receiver, Dykema, Romero, Jones, Ahuja, and Stretto have provided documentation for all hours billed and have exercised business judgment in the submission of the invoices attached to this Application.

52. Since December 2021, the Receiver and her team have successfully recovered over \$30 million dollars from the sale and/or auctions of personal property, the sale of real property, and settlements. This figure is before payment of contingency fees or other disbursements.

53. Courts also examine the credentials, experience, reputation, and other professional qualities required to carry out a receiver’s duties and responsibilities when assessing the reasonableness of the rates charged for services in a receivership. *See W.L. Moody & Co.*, 374 F. Supp. at 481; *SEC v. Aquacell Batteries, Inc.*, No. 6:07-cv-608-Orl-22DAB, 2008 WL 276026, at *4 (M.D. Fla. Jan. 31, 2008) (“The Receiver retained well qualified, experienced counsel and such representation does not come cheap.”). Biographies of all Retained Personnel of the Receiver are attached hereto as **Exhibits F-1, F-2 F-3, F-4, F-5, and F-6** for the Receiver, Dykema, Romero, Jones, Ahuja, and Stretto, respectively.⁶

54. The Receiver delegated tasks appropriately to her Retained Personnel and utilized information provided by them to develop and execute plans to maximize the value of the Receivership Estates while still accomplishing the tasks required of them. *See Johnson*, 488 F.2d at 718.

⁶ By way of example, in the *Flexible Funding Ltd. Liability Co.* bankruptcy case pending in the United States Bankruptcy Court for the Northern District of Texas, Fort Worth Division (Case No. 21-42215-MXM-11), Fort Worth-based firm Vartabedian Hester & Haynes, LLP is employed as lead counsel. The case status is post-confirmation; thus, fee applications are no longer filed in the case. However, prior to confirmation, Mr. Prostok, a partner in the firm, obtained court approval of a currently hourly rate of \$725.00 per hour. Mr. Prostok was admitted to practice two years after the Receiver.

55. When a receivership commands full-time attention and prevents professionals from accepting other engagements, the fee award should reflect it. *See W.L. Moody & Co.*, 374 F. Supp. at 483–84, 486. Similarly, the court should consider the usual and customary fees charged and the evidence presented to support the application for fees. *See Johnson*, 488 F.2d at 718; *Fifth Ave. Coach Lines, Inc.*, 364 F. Supp. at 1222. During the Application Period and throughout this Case, the Receiver and her team have devoted substantial time to conducting the many tasks required in this Case, including, but not limited to, drafting and prosecuting applications and motions; identifying, securing, and recovering Receivership Assets; selling various Receivership Assets upon Court approval; formulating and executing the Court-approved claims procedure; analyzing various distribution methodologies and formulating and proposing a distribution plan for Court approval; and communicating with hundreds of investors, pre-receivership vendors, opposing counsel, the Commission, the RRC, the Comptroller, the IRS, and other various other state and federal governmental agencies—all at a discounted rate.

56. The time spent, services performed, hourly rates charged, and expenses incurred by the Receiver’s Retained Personnel have been at all times reasonable and necessary, and indeed critical, for the Receiver to perform her Court-ordered duties. The Receiver respectfully suggests the qualifications set forth in this Application for the Receiver’s, Dykema’s, Romero’s, Jones’s, Ahuja’s, and Stretto’s fees and expenses, as applicable, during the Application Period meet the criteria for interim compensation when considering the *Johnson* factors.

Dykema

57. The fees charged by Dykema for Ms. Williamson’s work as the Receiver include all compensation being paid for her services during the Application Period and are included in Dykema’s invoice attached hereto as **Exhibit E-1**, separate and apart from the other Dykema professionals.

58. Dykema is a national law firm with offices throughout the United States. Dykema has provided critical legal expertise and manpower for every aspect of this Case to date. The attorneys working on this Case have included members, senior attorneys, senior counsel, associates, paraprofessionals, and support staff as warranted by the relevant tasks. *See Johnson*, 488 F.2d at 718–19. While ensuring proper and effective representation, the Receiver has only utilized the services of a limited team of Dykema professionals and paraprofessionals in order to limit fees and ensure a lean and nimble team. The Receiver delegated categorical tasks to certain Dykema professionals to limit duplication and overlap of services.

59. As detailed above, during the Application Period, Dykema undertook numerous tasks to further the goals of the Case, including, but not limited to:

- (a) Communicating with hundreds of investors (both known and potential), creditors, and other state and federal governmental authorities regarding various Receivership Parties, including, but not limited to, via website (www.heartlandreceivership.com), telephone (210-554-5845), and email (heartlandreceivership@dykema.com);
- (b) Researching, drafting, and filing various pleadings, proposed orders, and supporting documentation, as applicable;
- (c) Representing the Receiver in various matters before the Court;
- (d) Facilitating administrative and daily operational tasks requested by the Receiver;
- (e) Mitigating risks;
- (f) Investigating, pursuing, and/or settling causes of action held by the Receivership Estates;

- (g) Processing over a thousand IRS Form W-9 for Class 4, Class 4a, and Class 5 investors for distribution to investors and creditors; and
- (h) Identifying and beginning the process of terminating various Receivership Entities with the respective Secretary of State.

60. Dykema has served as lead counsel to the Receiver throughout this Case and has represented the Receiver in all proceedings, in addition to Romero. The matters presented in this Case have required expertise in a variety of legal subject matters. *See Johnson*, 488 F.2d at 718; *Fifth Ave. Coach Lines, Inc.*, 364 F. Supp. at 1222.

Romero

61. During the Application Period, Romero served as the Receiver's counsel in this Case in accordance with the Receivership Order. Romero communicated with the Receiver throughout the Application Period regarding open issues in the Case and prepared and participated in hearings before the Court.

Jones

62. During the Application Period, Jones served as the Receiver's oil and gas transactional counsel in this Case. Jones continued to communicate with the Receiver and Dykema throughout the Application Period regarding open post-abandonment issues in the Case.

Ahuja

63. During the Application Period, Ahuja served as the Receiver's accountants in this Case to analyze and review available tax and bank records of Receivership Parties. As detailed above, Ahuja responded to various notices from the IRS and other governmental authorities for various Receivership Parties, in addition to finalizing and submitting the federal tax returns of various Receivership Parties. Ahuja also provided updated potential exposure calculations and calculated current cash positions and expense allocations for various Receivership Parties.

64. With respect to taxes, Ahuja continued to analyze and calculate potential exposure for the Receiver due to unfiled payroll and income tax returns from periods prior to the establishment of the Receivership; responded to tax notices from the California Franchise Tax Board for Heartland Production and Recovery, LLC and assisted the Receiver in filing delinquent tax returns to facilitate the closure of the entity; and analyzed which Receivership Entities can be dissolved.

65. With respect to forensic accounting, Ahuja continued to answer specific investment inquiries. Ahuja continued tracing funds relating to the purchase of the Bahamas properties as discussed above.

Stretto

66. During the Application Period, Stretto served as the Receiver's claims and disbursement agent in this Case. Stretto communicated with the Receiver and her Retained Personnel throughout the Application Period, maintained and continuously updated the claims database, and prepared reports for the Receiver and Dykema on same. Stretto continued to update investor contact information during the Application Period at the request of Dykema. Stretto also continued to process completed and signed IRS Form W-9s upon receipt from Dykema.

Fees and Expenses of Receiver's Retained Personnel

67. The Receiver and her Retained Personnel have performed a substantial amount of work during the Application Period; however, there is a considerable amount of work to be done in this Case so that recoveries can be made for investors, creditors, and other stakeholders.

68. The Receiver, Dykema, Romero, Jones, Ahuja, and Stretto have incurred reasonable fees and/or expenses consistent with the Receivership Order in the best interests of

the Receivership Estates, and payment is appropriate and warranted in consideration of the services performed in this Case during the Application Period.

69. The chart below depicts the total fees and expenses requested by the Receiver, Dykema, Romero, Jones, Ahuja, and Stretto during the Application Period for services rendered and/or expenses incurred on behalf of the Receiver in connection with this Case:

<u>PROFESSIONAL</u>	<u>TOTAL HOURS</u>	<u>TOTAL FEES</u>	<u>TOTAL EXPENSES</u>
Deborah D. Williamson, Receiver	114.30 hours	\$77,152.50	\$0.00
Dykema Gossett PLLC	426.30 hours	\$135,422.32	\$8,275.45
Law Offices of Romero Kozub	4.40 hours	\$1,870.00	\$0.00
Law Practice of Darrell R. Jones, PLLC	8.30 hours	\$2,675.50	\$0.00
Ahuja & Clark, PLLC n/k/a Ahuja & Consultants, Inc.	350.38 hours	\$81,206.00	\$172.93
Stretto, Inc.	181.60 hours	\$38,496.00	\$1,061.14

70. As of the filing of the Application, the Receivership Estates have sufficient funds to pay all of the Retained Personnel's fees and expenses requested herein. The Receiver's Quarterly Reports detail the Receiver's bank account balances for the Application Period and confirm the same.

71. The fees associated with complex receivership cases often have been substantial percentages of the total assets found. *See, e.g., Megafund*, 2008 WL 2839998, at *2 (N.D. Tex. June 24, 2008); *Funding Res. Grp.*, 2003 WL 145411, at *1 (N.D. Jan. 15, 2003). As the Court can see in **Exhibits E-1, E-2, E-3, E-4, E-5, and E-6**, the Receiver and her Retained Personnel have been mindful of keeping fees expended to a minimum, while ensuring that the goals and needs of the Case, particularly, the hundreds of investors and other creditors, are met. If the fees and expenses are approved and paid as requested, remaining amounts will exceed approximately

\$2,600,000, exclusive of any recovery from additional settlements or any remaining personal property disposition.

VII. CONCLUSION

72. For the reasons stated herein, the Receiver requests that the Court enter an order (a) approving on an interim basis and authorizing payment of (i) all fees incurred by the Receiver during the Application Period, totaling \$77,152.50, (ii) all fees incurred by Dykema as counsel to the Receiver during the Application Period, totaling \$135,422.32 (iii) all fees incurred by Romero as counsel to the Receiver during the Application Period, totaling \$1,870.00, (iv) all fees incurred by Jones as oil and gas transactional counsel to the Receiver during the Application Period, totaling \$2,675.50, (v) all fees incurred by Ahuja as tax and forensic accountants to the Receiver during the Application Period, totaling \$81,206.00, and (vi) all fees incurred by Stretto as claims and disbursement agent to the Receiver during the Application Period, totaling \$38,496.00; (b) approving on an interim basis and authorizing payment of (i) all expenses incurred by Dykema in connection with services rendered as lead counsel to the Receiver during the Application Period, totaling \$8,275.45, (ii) all expenses incurred by Stretto in connection with services rendered as claims and disbursement agent to the Receiver during the Application Period, totaling \$1,061.14, and (iii) all expenses incurred by Abjua in connection with services, as tax and forensic accountants to the Receiver during the Application Period, totaling \$172.93; (c) authorizing the Receiver to pay (i) all authorized outstanding fee amounts to Dykema, including the Receiver's fees, totaling \$212,574.82, (ii) all authorized outstanding fee amounts to Romero, totaling \$1,870.00, (iii) all authorized outstanding fee amounts to Jones, totaling \$2,765.50, (iv) all authorized outstanding fee amounts to Ahuja, totaling \$81,206.00, and (v) all authorized outstanding fee amounts to Stretto, totaling \$38,496.00; (d) authorizing the Receiver to pay (i) all authorized outstanding expenses of Dykema, totaling \$8,275.45; (ii) all authorized

authorized outstanding fee amounts to Stretto, totaling \$38,496.00; (d) authorizing the Receiver to pay (i) all authorized outstanding expenses of Dykema, totaling \$8,275.45; (ii) all authorized outstanding expenses of Ahuja, totaling \$172.93 and (iii) all authorized outstanding expenses of Stretto, totaling \$1,061.14 and (e) awarding such other and further relief that this Court deems just and proper.

Dated: February 4, 2025

Respectfully submitted,

By: /s/ Deborah D. Williamson

Deborah D. Williamson

(Receiver)

State Bar No. 21617500

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COUNSEL TO RECEIVER

and

Madhu Ahuja
**AHUJA & CLARK, PLLC n/k/a
AHUJA & CONSULTANTS, INC.**
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Plano, Texas 75093
Telephone: (469) 467-4660

ACCOUNTANT TO RECEIVER

and

Daniel C. McElhinney
STRETTO, INC.
410 Exchange, Suite 100
Irvine, California 92602
Telephone: (714) 716-1872

**CLAIMS AND DISBURSEMENT
AGENT TO RECEIVER**

CERTIFICATE OF CONFERENCE

The Receiver and/or her counsel has conferred with counsel for Plaintiff, Securities and Exchange Commission (the “Commission”) regarding the relief requested herein. The Commission supports the relief requested herein.

/s/ Dominique A. Douglas
Dominique A. Douglas

CERTIFICATE OF SERVICE

I hereby certify that on February 4, 2025, the foregoing document was served via CM/ECF on all parties appearing in this case and via email on the following unrepresented parties on this Court's docket:

James Ikey
james.ikeyrcg@gmail.com

Bridy Ikey
bridydikey@gmail.com

IGroup Enterprises LLC
c/o James Ikey
james.ikeyrcg@gmail.com

John Muratore
jmuratore6@gmail.com

Muratore Financial Services, Inc.
c/o John Muratore
jmuratore6@gmail.com

Thomas Brad Pearsey
bradpearsey@aol.com

Manjit Singh (aka Roger) Sahota
Harprit Sahota
Monrose Sahota
rogersahota207@gmail.com

Sunny Sahota
sunnysanangelo@gmail.com

/s/ Dominique A. Douglas
Dominique A. Douglas

APPLICATION CERTIFICATION

I hereby certify that:

- (a) I have read the Application;
- (b) To the best of my knowledge, information, and belief, formed after reasonable inquiry, and except as noted in the Application, the Application and all fees disclosed therein are true and accurate and comply with the Commission Billing Instructions;
- (c) All fees contained in the Application are based on the rates listed in my fee schedule attached to the Application, and such fees are reasonable, necessary, and commensurate with the skill and expertise required for the activity performed;
- (d) I have not included in the amount for which reimbursement is sought the amortization of the cost of any investment, equipment, or capital outlay (except to the extent that any such amortization is included within the permitted allowable amounts set forth herein for photocopies and facsimile transmission); and
- (e) In seeking reimbursement for a service which was justifiably purchased or contracted for from a third party, I request reimbursement only for the amount billed by the third-party vendor and paid for by the Receiver to such vendor. I certify that I am not making a profit on such reimbursable service.

/s/ Deborah D. Williamson

Deborah D. Williamson, Receiver
Dykema Gossett PLLC
Applicant

APPLICATION CERTIFICATION

I hereby certify that:

- (a) I have read the Application;
- (b) To the best of my knowledge, information, and belief, formed after reasonable inquiry, and except as noted in the Application, the Application and all fees and expenses disclosed therein are true and accurate and comply with the Commission Billing Instructions;
- (c) All fees contained in the Application are based on the rates listed in Dykema's fee schedule attached to the Application, and such fees are reasonable, necessary, and commensurate with the skill and expertise required for the activity performed;
- (d) Dykema has not included in the amount for which reimbursement is sought the amortization of the cost of any investment, equipment, or capital outlay (except to the extent that any such amortization is included within the permitted allowable amounts set forth herein for photocopies and facsimile transmission); and
- (e) In seeking reimbursement for a service which Dykema justifiably purchased or contracted for from a third party, Dykema requests reimbursement only for the amount billed by the third-party vendor and paid for by Dykema to such vendor. If such services are performed by the Receiver, the Receiver will certify that she is not making a profit on such reimbursable service.

/s/ Dominique A. Douglas
Dominique A. Douglas
Danielle Rushing Behrends
Dykema Gossett PLLC
Applicant

APPLICATION CERTIFICATION

I hereby certify that:

- (a) I have read the Application;
- (b) To the best of my knowledge, information, and belief, formed after reasonable inquiry, and except as noted in the Application, the Application and all fees disclosed therein are true and accurate and comply with the Commission Billing Instructions;
- (c) All fees contained in the Application are based on the rates listed in Romero's fee schedule attached to the Application, and such fees are reasonable, necessary, and commensurate with the skill and expertise required for the activity performed;
- (d) Romero has not included in the amount for which reimbursement is sought the amortization of the cost of any investment, equipment, or capital outlay (except to the extent that any such amortization is included within the permitted allowable amounts set forth herein for photocopies and facsimile transmission); and
- (e) In seeking reimbursement for a service which Romero justifiably purchased or contracted for from a third party, Romero requests reimbursement only for the amount billed by the third-party vendor and paid for by Romero to such vendor. If such services are performed by the Receiver, the Receiver will certify that she is not making a profit on such reimbursable service.

/s/ Rose L. Romero

Rose L. Romero

Law Offices of Romero | Kozub

Applicant

APPLICATION CERTIFICATION

I hereby certify that:

- (a) I have read the Application;
- (b) To the best of my knowledge, information, and belief, formed after reasonable inquiry, and except as noted in the Application, the Application and all fees disclosed therein are true and accurate and comply with the Commission Billing Instructions;
- (c) All fees contained in the Application are based on the rates listed in Jones's fee schedule attached to the Application, and such fees are reasonable, necessary, and commensurate with the skill and expertise required for the activity performed;
- (d) Jones has not included in the amount for which reimbursement is sought the amortization of the cost of any investment, equipment, or capital outlay (except to the extent that any such amortization is included within the permitted allowable amounts set forth herein for photocopies and facsimile transmission); and
- (e) In seeking reimbursement for a service which Jones justifiably purchased or contracted for from a third party, Jones requests reimbursement only for the amount billed by the third-party vendor and paid for by Jones to such vendor. If such services are performed by the Receiver, the Receiver will certify that she is not making a profit on such reimbursable service.

/s/ Darrell R. Jones

Darrell R. Jones

Law Practice of Darrell R. Jones, PLLC

Applicant

APPLICATION CERTIFICATION

I hereby certify that:

- (a) I have read the Application;
- (b) To the best of my knowledge, information, and belief, formed after reasonable inquiry, and except as noted in the Application, the Application and all fees disclosed therein are true and accurate and comply with the Commission Billing Instructions;
- (c) All fees contained in the Application are based on the rates listed in Ahuja's fee schedule attached to the Application, and such fees are reasonable, necessary, and commensurate with the skill and expertise required for the activity performed;
- (d) Ahuja has not included in the amount for which reimbursement is sought the amortization of the cost of any investment, equipment, or capital outlay (except to the extent that any such amortization is included within the permitted allowable amounts set forth herein for photocopies and facsimile transmission); and
- (e) In seeking reimbursement for a service which Ahuja justifiably purchased or contracted for from a third party, Ahuja requests reimbursement only for the amount billed by the third-party vendor and paid for by Ahuja to such vendor. If such services are performed by the Receiver, the Receiver will certify that she is not making a profit on such reimbursable service.

/s/ Madhu Ahuja

Madhu Ahuja

Ahuja & Clark, PLLC

n/k/a Ahuja & Consultants, Inc.

Applicant

APPLICATION CERTIFICATION

I hereby certify that:

- (a) I have read the Application;
- (b) To the best of my knowledge, information, and belief, formed after reasonable inquiry, and except as noted in the Application, the Application and all fees disclosed therein are true and accurate and comply with the Commission Billing Instructions;
- (c) All fees contained in the Application are based on the rates listed in Stretto's fee schedule attached to the Application, and such fees are reasonable, necessary, and commensurate with the skill and expertise required for the activity performed;
- (d) Stretto has not included in the amount for which reimbursement is sought the amortization of the cost of any investment, equipment, or capital outlay (except to the extent that any such amortization is included within the permitted allowable amounts set forth herein for photocopies and facsimile transmission); and
- (e) In seeking reimbursement for a service which Stretto justifiably purchased or contracted for from a third party, Stretto requests reimbursement only for the amount billed by the third-party vendor and paid for by Stretto to such vendor. If such services are performed by the Receiver, the Receiver will certify that she is not making a profit on such reimbursable service.

/s/ Daniel C. McElhinney
Daniel C. McElhinney
Stretto, Inc.
Applicant

EXHIBIT A

Standardized Fund Accounting Report
Reporting Period: 10/01/2024 to 12/31/2024

		Detail	Subtotal	Grand Total
1	Beginning Balance (October 1, 2024):			\$ 9,222,154.03
2	Business Income		-	-
3	Cash and Cash Equivalents		-	-
4	Interest/Dividend Income		27,776.14	27,776.14
5	Business Asset Liquidation		-	-
6	Personal Asset Liquidation		-	-
7	Third-Party Litigation Income		-	-
8	Miscellaneous - Other	Refunds	98.78	98.78
	Total Funds Available			\$ 9,250,028.95
9	Disbursements to Investors			\$ 2,693,709.20
		Class 4, 4a	2,670,600.79	
		Class 5	23,108.41	
10	Disbursements for Receivership Operations			490,648.37
10a	Disbursements to Receiver or Other Professionals	Payments to Attorneys, Accountants, Receiver	327,579.16	
10b	Business Asset and Operating Expenses	Contractor payments, computer/server expenses, storage fees, filing fees	1,560.00	
10c	Personal Asset Expenses		-	
10d	Investment Expenses		-	
10e	Third-Party Litigation Expenses		-	
10f	Tax Administrator Fees and Bonds		-	
10g	Federal and State Tax Expenses		161,509.21	
11	Disbursements for Distribution Expenses Paid by the Fund			
11a	Distribution Plan Development Expenses		-	
11b	Distribution Plan Implementation Expenses		-	
12	Disbursements to Court/Other			
12a	Court Registry Investment System (CRIS) or other banking fees related to the Fund.			
12b	Federal income taxes		-	
	Total Funds Disbursed			\$ 3,184,357.57
13	Ending Balance (December 31, 2024)			\$ 6,065,671.38
14	Ending Balance of Fund - Net Assets			\$ 6,065,671.38
14a	Cash & Cash Equivalents		\$ 6,065,671.38	
14b	Investments			
14c	Other Assets or Uncleared Funds			
15	Disbursements for Plan Administration Expenses Not Paid by the Fund			-
15a	Plan Development Expenses Not Paid by the Fund			
15b	Plan Implementation Expenses Not Paid by the Fund			
15c	Tax Administrator Fees & Bonds Not Paid by the Fund			
16	Disbursements to Court/Other Not Paid by the Fund			
16a	Court Registry Investment System (CRIS) or other banking fees related to the Fund			
16b	Federal income taxes			
17	DC & State Tax Payments			-
18	No. of Claims			

Standardized Fund Accounting Report
Reporting Period: 10/01/2024 to 12/31/2024

		Detail	Subtotal	Grand Total
18a	the number of claims received from investors during this reporting period	0 claims		
18b	the number of claims received from investors as a result of all orders since the inception of the Fund	734 claims		
19	No. of Claimants/Investors			
19a	the number of claimants/investors receiving distributions during the reporting period	187 claimants		
19b	the number of claimants/investors receiving distributions pursuant to all orders of distribution since the inception of the Fund	630 claimants		

EXHIBIT B

**ORDER APPROVING RECEIVER'S FEE APPLICATION FOR SERVICES PERFORMED
BETWEEN OCTOBER 1, 2024 AND DECEMBER 31, 2024, AND BRIEF IN SUPPORT**

Before the Court is the *Fee Application for Services Performed Between October 1, 2024 and December 31, 2024, and Brief in Support* (the “Application”),¹ filed by Deborah D. Williamson, Court-appointed Receiver in the Case, pursuant to the Court’s *Order Appointing Receiver* [ECF No. 17], entered on December 2, 2021, in this Case, requesting approval and authorization of fees and expenses incurred by Deborah D. Williamson, as Receiver; Dykema Gossett PLLC (“Dykema”); the Law Offices of Romero | Kozub (“Romero”); Law Practice of Darrell R. Jones, PLLC (“Jones”); Ahuja & Clark, PLLC n/k/a Ahuja & Consultants, Inc. (“Ahuja”); and Stretto (“Stretto”), during the Application Period. Upon consideration of the Application, the Court finds that: (i) it has subject matter jurisdiction over the Application; (ii) it has personal jurisdiction over the Receivership Parties; (iii) the Receiver, Dykema, Romero, Jones, Ahuja, and Stretto have provided reasonable services at reasonable rates that have benefitted the Receivership Estates during the Application Period; (iv) the relief requested in the Application is in the best interests of the Receivership Estates and all parties-in-interest thereof; (v) proper and adequate notice of the Application has been given and that no other or further notice is necessary; and (vi) the deadline for filing objections to the Application has expired and no objection to the Application was filed with this Court; accordingly,

IT IS HEREBY ORDERED, ADJUDGED, AND DECREED THAT:

1. The Application is **APPROVED** to the extent set forth herein.
2. The Receiver’s fees incurred during the Application Period are approved on an interim basis and allowed in the amount of **\$77,152.50**.

¹ Capitalized terms used herein but not otherwise defined shall have the meaning ascribed in the Application.

3. Dykema's fees incurred during the Application Period are approved on an interim basis and allowed in the amount of **\$135,422.32**.

4. Romero's fees incurred during the Application Period are approved on an interim basis and allowed in the amount of **\$1,870.00**.

5. Jones's fees incurred during the Application Period are approved on an interim basis and allowed in the amount of **\$2,675.50**.

6. Ahuja's fees incurred during the Application Period are approved on an interim basis and allowed in the amount of **\$81,206.00**.

7. Stretto's fees incurred during the Application Period are approved on an interim basis and allowed in the amount of **\$38,496.00**.

8. Dykema's expenses incurred during the Application Period in connection with services rendered on behalf of the Receiver are approved on an interim basis and allowed in the amount of **\$8,275.45**.

9. Stretto's expenses incurred during the Application Period in connection with services rendered on behalf of the Receiver are approved on an interim basis and allowed in the amount of **\$1,061.14**.

10. Abjua's expenses incurred during the Application Period in connection with services rendered on behalf of the Receiver are approved on an interim basis and allowed in the amount of **\$172.93**.

11. The Receiver is hereby authorized to pay all outstanding fee and expense amounts approved herein for the Application Period to Dykema (inclusive of the Receiver), Romero, Jones, Ahuja, and Stretto from the available funds of the Receivership Estates.

SO ORDERED.

[_____], 2025.

HAL R. RAY, JR.
UNITED STATES MAGISTRATE JUDGE

Prepared and submitted by:

Deborah D. Williamson

(Receiver)

State Bar No. 21617500

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LAW PRACTICE OF

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Telephone: (832) 302-5373

COUNSEL TO RECEIVER

EXHIBIT C*Summary of Fees by Timekeeper***Receiver**

<u>TIMEKEEPER</u>	<u>HOURS</u>	<u>HOURLY RATE</u>	<u>TOTAL FEES</u>
Deborah D. Williamson	114.30 hours	\$675.00	\$77,152.50

Dykema Gossett PLLC

<u>TIMEKEEPER</u>	<u>TITLE</u>	<u>HOURS</u>	<u>HOURLY RATE</u>	<u>TOTAL FEES</u>
Behrends, Danielle Rushing	Member	51.70 hours	\$350.00	\$18,095.00
Cumming, Michael G.	Member	2.10 hours	\$648.00	\$1,360.80
Gifford, Jeffrey	Member	1.90 hours	\$576.00	\$1,094.40
Dominguez, Alanna M.	Associate	7.0 hours	\$330.00	\$2,310.00
Douglas, Dominique A.	Associate	282.20 hours	\$330.00	\$93,126.00
Douglas, Dominique A. (travel)	Associate	1.40 hours	\$165.00	\$244.02
Dick, Theresa E.	Paralegal	9.00 hours	\$256.50	\$2,308.50
Lafuente, Adrianna	Paralegal	69.40 hours	\$230.00	\$15,962.00

Law Offices of Romero | Kozub

<u>TIMEKEEPER</u>	<u>HOURS</u>	<u>HOURLY RATE</u>	<u>TOTAL FEES</u>
Rose L. Romero	4.40 hours	\$425.00	\$1,870.00

Law Practice of Darrell R. Jones, PLLC

<u>TIMEKEEPER</u>	<u>HOURS</u>	<u>HOURLY RATE</u>	<u>TOTAL FEES</u>
Eric Hillerman	8.30 hours	\$325.00	\$2,697.50

Ahuja & Clark, PLLC n/k/a Ahuja & Consultants, Inc.

<u>TIMEKEEPER</u>	<u>HOURS</u>	<u>HOURLY RATE</u>	<u>TOTAL FEES</u>
Ahuja, Madhu	25.50 hours	\$325.00	\$8,287.50
Blevins, Jeanne-Marie	15.50 hours	\$120.00	\$1,860.00
Bremer, Carolyn	14.70 hours	\$325.00	\$4,777.50
Hall, Jessica	19.80 hours	\$120.00	\$2,376.00
Huser, Stacey	150.58 hours	\$250.00	\$37,645.00
Kathiriya, Arti	2.30 hours	\$180.00	\$414.00
Kwande, Devon	1.20 hours	\$250.00	\$300.00
Shetty, Divya	85.00 hours	\$250.00	\$21,250.00
Wallace, Jennifer	35.80 hours	\$120.00	\$4,296.00

Stretto, Inc.

<u>TIMEKEEPER</u>	<u>HOURS</u>	<u>HOURLY RATE</u>	<u>TOTAL FEES</u>
Alcantar, Staphany	0.50	\$40.00	\$20.00
Alduenda, Jenice	5.50	\$175.00	\$962.50
Alduenda, Jenice	5.00	\$345.00	\$1,725.00
Betance, Sheryl	0.60	\$210.00	\$126.00
Bouzos, Jason	6.10	\$165.00	\$1,006.50
Bouzos, Jason	2.90	\$325.00	\$942.50
Cady, Stephen	8.90	\$205.00	\$1,824.50
Cady, Stephen	4.00	\$395.00	\$1,580.00
Cruz, Jose	0.30	\$65.00	\$19.50
Guevara, Ruben	2.30	\$135.00	\$310.50
Guevara, Ruben	1.00	\$325.00	\$325.00
Hale, Micheal	16.20	\$135.00	\$2,187.00
Hale, Micheal	23.20	\$325.00	\$7,540.00
Marshall, Aimee	2.20	\$130.00	\$286.00
McElhinney, Dan	0.80	\$210.00	\$168.00
Membrino, Melissa	1.10	\$185.00	\$203.50
Morales, Stephanie	1.30	\$40.00	\$52.00
Morales, Stephanie	0.20	\$97.50	\$19.50
Quang, Ricky	1.00	\$65.00	\$65.00
Ramirez, Daniel	3.80	\$135.00	\$513.00
Rodriguez, Naomi	0.80	\$65.00	\$52.00
Rubio, Antonio	0.20	\$65.00	\$13.00
Saraceni, Robert	47.20	\$185.00	\$8,732.00
Saraceni, Robert	23.80	\$195.00	\$4,641.00
Tondreault, Laura	1.50	\$50.00	\$75.00
Wasserman, Kevin	1.00	\$165.00	\$165.00
Wheeler, Charles	0.20	\$130.00	\$26.00
Wisbey, Morgan	12.40	\$185.00	\$2,294.00
Wisbey, Morgan	7.60	\$345.00	\$2,622.00
TOTALS:	181.60		\$38,496.00

EXHIBIT D*Summary of Fees by Task for All Matters***Receiver**

<u>Category Description</u>	<u>Total Billable Amount</u>	<u>Total Billable Time</u>
Case Administration	\$30,037.50	44.50 hours
Asset Analysis and Recovery	\$3,240.00	4.80 hours
Asset Disposition	\$405.00	0.60 hours
Business Operations	\$1,012.50	1.50 hours
Tax Issues	\$14,580.00	21.60 hours
Claims Administration and Objection	\$9,180.00	13.60 hours
Status Reports	\$2,970.00	4.40 hours
Business Analysis	\$2,835.00	4.20 hours
Litigation Consulting	\$210.00	0.60 hours
TOTAL	\$77,152.50	114.30 hours

Dykema Gossett PLLC

<u>Category Description</u>	<u>Total Billable Amount</u>	<u>Total Billable Time</u>
Case Administration ⁹	\$72,118.50	238.60 hours
Asset Analysis and Recovery	\$6,149.00	18.50 hours
Asset Disposition	\$1,400.00	4.00 hours
Business Operations	\$7,415.40	20.00 hours
Tax Issues	\$10,898.82	31.50 hours
Claims Administration and Objection	\$31,320.00	46.40 hours
Status Reports	\$4,217.00	12.70 hours
Corporate Finance	\$66.00	0.20 hours
Business Analysis	\$921.60	1.60 hours
Litigation Consulting	\$20,315.00	63.10 hours
TOTAL	\$135,422.32	426.30 hours

⁹ Calls from investors were often about the distribution/claims administration process, inquiring about their distribution and the distribution timeline, and the status of the Receivership. There are entries tasked as “Case Administration” which also could be tasked as “Claims Administration and Objection.”

Law Offices of Romero | Kozub

<u>Category Description</u>	<u>Total Billable Amount</u>	<u>Total Billable Time</u>
Case Administration	\$1,870.00	4.40 hours
TOTAL	\$1,870.00	4.40 hours

Law Practice of Darrell R. Jones, PLLC

<u>Category Description</u>	<u>Total Billable Amount</u>	<u>Total Billable Time</u>
Business Operations	\$2,675.50	8.30 hours
TOTAL	\$2,675.50	8.30 hours

Ahuja & Clark, PLLC n/k/a Ahuja & Consultants, Inc.

<u>Category Description</u>	<u>Total Billable Amount</u>	<u>Total Billable Time</u>
Accounting/Auditing	\$45,003.50	206.28 hours
Tax Issues	\$30,990.00	127.40 hours
Forensic Accounting	\$5,212.50	16.70 hours
TOTAL	\$81,206.00	350.38 hours

Stretto, Inc.

<u>Category Description</u>	<u>Total Billable Amount</u>	<u>Total Billable Time</u>
Case Administration	\$38,496.00	181.60 hours
Claims Administration and Objections	\$0.00	0.00 hours
TOTAL	\$38,496.00	181.60 hours

EXHIBIT E-1



400 Renaissance Center • Detroit, MI 48243 • EIN# 38-1446628

DEBORAH D WILLIAMSON
DEBORAH WILLIAMSON
112 E. PECAN
STE. 1800
SAN ANTONIO, TX 78205

DUE UPON RECEIPT

JANUARY 31, 2025
MATTER #: 122686.000001
INVOICE #: 3639142

FOR PROFESSIONAL SERVICES RENDERED

RE: RECEIVER'S TIME

FEES	\$	34,830.00
INVOICE TOTAL	\$	34,830.00



DEBORAH D WILLIAMSON
DEBORAH WILLIAMSON

MATTER #: 122686.000001
INVOICE #: 3639142
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JANUARY 31, 2025

RE: RECEIVER'S TIME

DATE	ID	DESCRIPTION	TASK	HOURS	AMOUNT
10/01/24	DDW	PREPARE FOR AND ATTEND CONFERENCE WITH AHUJA & CONSULTANTS REGARDING PAYROLL AND OTHER TAXES.	B240	0.70	472.50
10/01/24	DDW	REVIEW AND APPROVE PAYMENT OF PAYROLL TAXES; DRAFT COVER LETTER TO IRS REGARDING SAME.	B240	1.30	877.50
10/01/24	DDW	CONFERENCE WITH MS. DOUGLAS REGARDING QUARTERLY REPORT.	B110	0.30	202.50
10/01/24	DDW	REVIEW AND APPROVE TIMING OF NEXT DISTRIBUTION AND NOTICE TO INVESTORS.	B310	0.60	405.00
10/01/24	DDW	REVIEW OF UPDATE REGARDING VALVERDE/CROCKETT.	B110	0.40	270.00
10/01/24	DDW	REVIEW AND RESPOND TO COMMUNICATIONS WITH SEC.	B110	0.30	202.50
10/01/24	DDW	REVIEW AND RESPOND TO COMMUNICATIONS WITH INVESTORS REGARDING STATUS.	B310	0.60	405.00
10/02/24	DDW	REVIEW AND REVISE THIRD QUARTER QUARTERLY REPORT.	B110	1.60	1,080.00
10/02/24	DDW	REVIEW AND REVISE CORRESPONDENCE WITH INVESTORS WHO HAVE NOT SUBMITTED A W-9.	B310	1.00	675.00
10/02/24	DDW	REVIEW OF JUDGMENTS AND ANALYSIS OF PAYMENT TERMS.	B120	0.60	405.00
10/02/24	DDW	CONFERENCE REGARDING DELAWARE REQUIREMENT FOR CANCELLATION OF LLC.	B110	0.40	270.00
10/03/24	DDW	MULTIPLE CONFERENCES AND EMAILS REGARDING MOTIONS RELATED TO FAILURE TO SUBMIT W-9S AND RELATED COMMUNICATIONS.	B110	0.80	540.00
10/03/24	DDW	REVIEW OF UPDATED BAHAMAS ANALYSIS AND DRAFT AND RESPOND TO EMAILS REGARDING SAME.	BT160	1.70	1,147.50
10/03/24	DDW	COMMUNICATIONS WITH INVESTORS.	B310	0.40	270.00
10/04/24	DDW	RESPOND TO INVESTOR INQUIRIES.	B110	0.40	270.00
10/04/24	DDW	ADDRESS ISSUES RELATED TO TIMING OF DISTRIBUTION, W-9S AND OTHER ISSUES.	B310	0.50	337.50
10/07/24	DDW	MULTIPLE COMMUNICATIONS REGARDING DISTRIBUTIONS.	B110	0.80	540.00
10/08/24	DDW	PREPARE FOR AND ATTEND CONFERENCE WITH AHUJA & CONSULTANTS REGARDING TAX RETURNS (940, 941, 2019 FOR DALLAS RESOURCES AND CALIFORNIA RETURNS); REVIEW AND EXECUTE FOUR TAX RETURNS AND RELATED DOCUMENTS.	B240	1.60	1,080.00



DEBORAH D WILLIAMSON
DEBORAH WILLIAMSON

MATTER #: 122686.000001
INVOICE #: 3639142
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JANUARY 31, 2025

DATE	ID	DESCRIPTION	TASK	HOURS	AMOUNT
10/08/24	DDW	REVISE MOTION TO APPROVE PROCESS TO TERMINATE BUSINESS.	B110	0.90	607.50
10/08/24	DDW	COMMUNICATE WITH INVESTORS REGARDING PAYMENTS; REVIEW OF UPDATED LIST OF SECOND ROUND OF DISTRIBUTIONS.	B110	1.10	742.50
10/08/24	DDW	REVIEW AND RESPOND TO BONDING COMPANY REGARDING TEXAS RAILROAD COMMISSION ON BOND DRAWS.	B110	0.90	607.50
10/09/24	DDW	MULTIPLE EMAILS AND CONFERENCES REGARDING TIMING OF NEXT DISTRIBUTION, ISSUES RELATED TO W-9S, ALLEGED "BUTTERFLY TRUSTS", AND OTHER ISSUES.	B310	1.30	877.50
10/09/24	DDW	REVIEW OF 22ND REPORT REGARDING VAL VERDE/CROCKETT, DRAFT AND RESPOND TO EMAILS REGARDING SAME.	B110	0.70	472.50
10/09/24	DDW	REVIEW OF NOTICE OF STATUS HEARING AND DRAFT AND RESPOND TO EMAILS REGARDING NOTICE OF HEARING AND OTHER ISSUES.	B110	0.40	270.00
10/09/24	DDW	BEGIN DRAFTING STATUS REPORT.	BT155	1.60	1,080.00
10/10/24	DDW	DRAFT AND RESPOND TO COMMUNICATION REGARDING CORPORATE TRANSPARENCY ACT AND BENEFICIAL OWNER STATUS.	B110	0.30	202.50
10/10/24	DDW	PREPARE FOR AND ATTEND MEETING WITH SEC.	B110	1.00	675.00
10/10/24	DDW	CONTINUE DRAFTING STATUS REPORT.	BT155	1.20	810.00
10/10/24	DDW	REVIEW AND RESPOND TO DEPARTMENT OF INSURANCE ON INSURANCE HEARING.	B110	0.40	270.00
10/11/24	DDW	CONFERENCES AND EMAILS REGARDING W9S AND DISTRIBUTIONS.	B110	0.60	405.00
10/14/24	DDW	REVISE STATUS REPORT AND DRAFT EMAILS REGARDING SAME.	BT155	0.50	337.50
10/14/24	DDW	REVIEW AND REVISE QUARTERLY REPORT.	B110	0.40	270.00
10/14/24	DDW	RESPOND TO MULTIPLE EMAILS REGARDING DISTRIBUTION INCLUDING CLAIMS REPORT.	B110	0.60	405.00
10/15/24	DDW	REVIEW AND REVISE STATUS REPORT; DRAFT AND RESPOND TO EMAILS REGARDING SAME.	BT155	0.60	405.00
10/15/24	DDW	PREPARE FOR AND ATTEND MEETING WITH AHUJA & CONSULTANTS REGARDING TAX AND OTHER ISSUES.	B240	0.90	607.50
10/15/24	DDW	MULTIPLE COMMUNICATIONS REGARDING DISTRIBUTIONS, TIMING, RELATED CORRESPONDENCE AND OTHER ISSUES.	B310	1.10	742.50



DEBORAH D WILLIAMSON
DEBORAH WILLIAMSON

MATTER #: 122686.000001
INVOICE #: 3639142
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JANUARY 31, 2025

DATE	ID	DESCRIPTION	TASK	HOURS	AMOUNT
10/15/24	DDW	REVIEW OF SUMMARY OF INFORMATION REQUESTED BY SEC; DRAFT AND RESPOND TO EMAILS REGARDING SAME.	B110	0.90	607.50
10/15/24	DDW	REVIEW AND REVISE QUARTERLY REPORT.	B110	0.80	540.00
10/16/24	DDW	REVIEW AND REVISE LETTER TO INVESTOR REGARDING DISTRIBUTION PROCESS AND PAYMENT AMOUNTS.	B310	0.50	337.50
10/16/24	DDW	FINALIZE STATUS REPORT.	BT155	0.50	337.50
10/16/24	DDW	REVIEW OF IRS SUBPOENA; DRAFT AND RESPOND TO EMAILS REGARDING SAME.	B240	0.50	337.50
10/16/24	DDW	REVISE QUARTERLY REPORT.	B110	0.70	472.50
10/16/24	DDW	MULTIPLE CONFERENCES REGARDING DISTRIBUTION ISSUES AND APPROVAL OF 10/17/24 DISTRIBUTION.	B110	0.60	405.00
10/17/24	DDW	FINALIZE QUARTERLY REPORT.	B110	0.60	405.00
10/17/24	DDW	CONFERENCE WITH MS. ROMERO IN PREPARATION FOR STATUS CONFERENCE.	B110	0.30	202.50
10/17/24	DDW	MULTIPLE CONFERENCES AND EMAILS REGARDING HEARTLAND INVESTORS AND ALLEGED INVESTORS.	B110	0.60	405.00
10/17/24	DDW	MULTIPLE EMAILS REGARDING DISTRIBUTION.	B310	0.50	337.50
10/17/24	DDW	PREPARE FOR AND ATTEND STATUS CONFERENCE.	B110	0.60	405.00
10/21/24	DDW	REVISE AND APPROVE NOTICE OF OCTOBER 17 DISTRIBUTION.	B310	0.60	405.00
10/21/24	DDW	REVIEW COMMENTS TO MOTION REGARDING PROCEDURES FOR WINDING UP/DISSOLUTION.	B110	1.10	742.50
10/21/24	DDW	REVIEW AND REVISE RESPONSE TO IRS SUBPOENA REGARDING IGROUP ENTERPRISES.	B240	0.90	607.50
10/21/24	DDW	PREPARE FOR AND ATTEND CONFERENCE REGARDING GUATEMALA PROPERTY.	B130	0.60	405.00
10/21/24	DDW	REVIEW INVESTOR COMMUNICATIONS.	B110	0.40	270.00
10/22/24	DDW	REVIEW AND RESPOND TO EMAILS REGARDING IOWA DEPARTMENT OF INSURANCE DISCOVERY.	BT160	0.80	540.00
10/22/24	DDW	ADDRESS ISSUES RAISED REGARDING MOTION REGARDING PROCESS FOR TERMINATION.	B110	0.80	540.00
10/23/24	DDW	REVIEW OF DOCUMENTS TO BE PRODUCED TO IOWA DEPARTMENT OF INSURANCE AND RELATED CORRESPONDENCE.	BT160	1.40	945.00
10/23/24	DDW	REVIEW OF INFORMATION SENT TO SEC RELATED TO DEPOSITS AND OTHER ISSUES; DRAFT AND RESPOND TO EMAILS	BT160	0.90	607.50



DEBORAH D WILLIAMSON
DEBORAH WILLIAMSON

MATTER #: 122686.000001
INVOICE #: 3639142
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JANUARY 31, 2025

DATE	ID	DESCRIPTION	TASK	HOURS	AMOUNT
		REGARDING SAME.			
10/23/24	DDW	ANALYSIS OF EFFECT OF TERMINATION OF CORPORATE EXISTENCE OF OPERATOR ON THIRD PARTIES INCLUDING EQUITY AND OFFICERS.	B110	0.70	472.50
10/24/24	DDW	REVIEW AND REVISE PLEADINGS REGARDING TERMINATION OF ENTITIES.	B110	0.70	472.50
10/28/24	DDW	REVISE CORRESPONDENCE REGARDING CENTRAL APPRAISAL DISTRICT TAX NOTICES ON ABANDONED PROPERTIES, CONFERENCES REGARDING SAME.	B240	0.60	405.00
10/28/24	DDW	REVIEW AND APPROVE DISCLOSURE IN IOWA INSURANCE COMMISSION ACTION.	BT160	0.30	202.50
10/28/24	DDW	MULTIPLE EMAILS REGARDING W-9S AND OTHER DISTRIBUTION ISSUES.	B310	0.60	405.00
10/29/24	DDW	PREPARE FOR INTERVIEW WITH THE IOWA INSURANCE COMMISSION INCLUDING REVIEW OF PROPOSED EXHIBITS.	BT160	1.40	945.00
10/29/24	DDW	REVIEW AND RESPOND TO INVESTOR ISSUES RELATED TO DEPOSITS, W-9S AND OTHER DISTRIBUTION QUESTIONS.	B310	0.60	405.00
10/30/24	DDW	PREPARE FOR AND ATTEND CONFERENCE WITH IOWA DEPARTMENT OF INSURANCE.	BT160	2.10	1,417.50
10/30/24	DDW	REVIEW OF UPDATE REGARDING VAL VERDE/CROCKETT OPERATIONS.	B210	0.30	202.50
10/31/24	DDW	FINALIZE MOTION TO APPROVE TERMINATION PROCEDURES.	B110	0.80	540.00
10/31/24	DDW	APPROVE RE-ISSUANCE OF CHECKS AND OTHER DISTRIBUTION ISSUES.	B310	0.40	270.00
TOTAL				51.60	\$34,830.00



DEBORAH D WILLIAMSON
DEBORAH WILLIAMSON

MATTER #: 122686.000001
INVOICE #: 3639142
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JANUARY 31, 2025

BILLING SUMMARY

ID	TIMEKEEPER	TITLE	HOURS	RATE	AMOUNT
DDW	DEBORAH WILLIAMSON	MEMBER	51.60	675.00	34,830.00
	TOTAL		51.60		\$34,830.00



DEBORAH D WILLIAMSON
DEBORAH WILLIAMSON

MATTER #: 122686.000001
INVOICE #: 3639142
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JANUARY 31, 2025

TASK SUMMARY

TASK	TASK DESCRIPTION	HOURS	AMOUNT
B110	CASE ADMINISTRATION	21.90	14,782.50
B120	ASSET ANALYSIS AND RECOVERY	0.60	405.00
B130	ASSET DISPOSITION	0.60	405.00
B210	BUSINESS OPERATIONS	0.30	202.50
B240	TAX ISSUES	6.50	4,387.50
B310	CLAIMS ADMINISTRATION & OBJECT	8.70	5,872.50
BT155	STATUS REPORTS	4.40	2,970.00
BT160	LITIGATION CONSULTING	8.60	5,805.00
TOTAL		51.60	34,830.00



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DEBORAH D WILLIAMSON
DEBORAH WILLIAMSON
112 E. PECAN
STE. 1800
SAN ANTONIO, TX 78205

DUE UPON RECEIPT

JANUARY 31, 2025
MATTER #: 122686.000001
INVOICE #: 3639143

FOR PROFESSIONAL SERVICES RENDERED

RE: RECEIVER'S TIME

FEES	\$	16,335.00
INVOICE TOTAL	\$	16,335.00



DEBORAH D WILLIAMSON
DEBORAH WILLIAMSON

MATTER #: 122686.000001
INVOICE #: 3639143
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JANUARY 31, 2025

RE: RECEIVER'S TIME

DATE	ID	DESCRIPTION	TASK	HOURS	AMOUNT
11/01/24	DDW	REVIEW OF UPDATE ON APPLICATION OF CORPORATE TRANSPARENCY ACT.	B210	0.50	337.50
11/04/24	DDW	MULTIPLE EMAILS AND CONFERENCES REGARDING PAYMENT TO EX-SPOUSES AND OTHER CLAIMS ISSUES.	B110	0.60	405.00
11/05/24	DDW	REVIEW OF UPDATES ON CORPORATE TRANSPARENCY ACT AND APPLICABILITY TO RECEIVERS.	B210	0.40	270.00
11/06/24	DDW	PREPARE FOR AND ATTEND TELEPHONE CONFERENCE WITH MR. JONES REGARDING MODIFIED FARMOUT AGREEMENT.	B110	0.60	405.00
11/07/24	DDW	PREPARE FOR AND ATTEND MEETING WITH SEC.	B110	0.60	405.00
11/07/24	DDW	MULTIPLE CONFERENCES REGARDING ISSUES RAISED BY FORMER WIFE AND RELATED ISSUES.	B310	0.90	607.50
11/11/24	DDW	REVIEW OF BAHAMAS RELATED PLEADINGS AND CONFERENCE WITH MS. DOUGLAS REGARDING SAME.	B120	2.60	1,755.00
11/11/24	DDW	CONFERENCE REGARDING FLORIDA ENFORCEMENT AGENCY.	B110	0.40	270.00
11/12/24	DDW	PREPARE FOR AND ATTEND MEETING WITH AHUJA & CONSULTANTS ON TAX ISSUES INCLUDING REVIEW OF IRS NOTICES REGARDING BARRON PETROLEUM, CALIFORNIA FILINGS AND MULTIPLE FORM 5495 REGARDING RELEASE OF PERSONAL LIABILITY.	B240	2.30	1,552.50
11/12/24	DDW	REVIEW OF OUTLINE OF CLAIMS AND PROCEDURES FOR BRINGING ACTION AGAINST DEFENDANTS/RELIEF DEFENDANTS AND RELATED THIRD PARTIES.	BT160	0.60	405.00
11/12/24	DDW	REVIEW OF PROPOSED PROCESS TO TERMINATE AUTHORITY TO DO BUSINESS IN CALIFORNIA FOR HEARTLAND PRODUCTION AND RECOVERY.	B110	0.40	270.00
11/12/24	DDW	COMMUNICATE WITH INVESTORS REGARDING ADDITIONAL DISTRIBUTIONS AND STATUS OF CASES	B110	0.50	337.50
11/14/24	DDW	PREPARE FOR AND ATTEND HEARING INCLUDING PLEADINGS REGARDING TERMINATION AND OTHER ISSUES.	B110	1.00	675.00
11/14/24	DDW	PREPARE FOR AND ATTEND CONFERENCE WITH AHUJA & CONSULTANTS ON TAX ISSUES (PAYROLL), INCLUDING REVIEW OF PRIOR CORRESPONDENCE AND PAYMENTS.	B240	1.70	1,147.50
11/15/24	DDW	REVIEW OF UPDATE REGARDING CASHED/UNCASHED DISTRIBUTIONS; DRAFT AND RESPOND TO EMAILS REGARDING	B110	0.50	337.50



DEBORAH D WILLIAMSON
DEBORAH WILLIAMSON

MATTER #: 122686.000001
INVOICE #: 3639143
PAGE 3

JANUARY 31, 2025

DATE	ID	DESCRIPTION	TASK	HOURS	AMOUNT
		SAME.			
11/15/24	DDW	REVIEW AND RESPOND TO EMAILS WITH MR. PASSANANTI REGARDING DEMANDS RELATING TO POTENTIAL SETTLEMENT WITH SEC .	B110	0.50	337.50
11/15/24	DDW	DRAFT AND RESPOND TO EMAILS REGARDING ACCOUNTS.	B110	0.40	270.00
11/18/24	DDW	REVIEW OF SUMMARY OF OUTSTANDING PAYROLL TAXES, TAX RETURNS AND OTHER ISSUES; DRAFT AND RESPOND TO EMAILS REGARDING SAME.	B240	1.10	742.50
11/18/24	DDW	CONFERENCE REGARDING DRAFT BAHAMAS COMPLAINT.	B120	0.30	202.50
11/18/24	DDW	CONFERENCE WITH BANK REGARDING TRANSFER OF FUNDS; REVIEW AND RESPOND TO EMAILS REGARDING SAME.	B110	0.60	405.00
11/18/24	DDW	CONFERENCE WITH MS. BEHRENDIS REGARDING DISCOVERY, ACCOUNTS AND OTHER ISSUES.	B110	0.40	270.00
11/19/24	DDW	PREPARE FOR AND ATTEND CONFERENCE WITH SEC.	BT160	0.60	405.00
11/19/24	DDW	CONFERENCES REGARDING IDENTIFICATION OF TRANSFERS AND TRANSFEREES.	BT160	0.70	472.50
11/21/24	DDW	ADDRESS ISSUES RELATED TO FUND TRANSFERS.	B110	0.40	270.00
11/22/24	DDW	REVIEW AND RESPOND TO SEC.	BT160	0.20	135.00
11/25/24	DDW	REVIEW OF REVISED FORMS 5495 AND DRAFT EMAILS TO AHUJA & CONSULTANTS REGARDING SAME.	B240	1.10	742.50
11/25/24	DDW	REVIEW AND PAY PAYROLL TAXES FOR BARRON FOR 2019 INCLUDING REVISING LETTER TO IRS.	B240	1.70	1,147.50
11/25/24	DDW	REVIEW OF ANALYSIS OF FRAUDULENT CONVEYANCE CLAIMS RELATED TO BAHAMAS PROPERTY.	BT160	0.60	405.00
11/26/24	DDW	PREPARE FOR AND ATTEND MEETING WITH SEC; DRAFT UPDATE TO AHUJA & CONSULTANTS REGARDING SPREADSHEETS AND ASSET DISPOSITIONS.	B110	1.60	1,080.00
11/27/24	DDW	REVIEW AND RESPOND TO STRETTO UPDATE REGARDING STATUS OF PAYMENTS, CASHING OF CHECKS AND OTHER ISSUES.	B110	0.40	270.00
		TOTAL		24.20	\$16,335.00



DEBORAH D WILLIAMSON
DEBORAH WILLIAMSON

MATTER #: 122686.000001
INVOICE #: 3639143
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JANUARY 31, 2025

BILLING SUMMARY

ID	TIMEKEEPER	TITLE	HOURS	RATE	AMOUNT
DDW	DEBORAH WILLIAMSON	MEMBER	24.20	675.00	16,335.00
	TOTAL		24.20		\$16,335.00



DEBORAH D WILLIAMSON
DEBORAH WILLIAMSON

MATTER #: 122686.000001
INVOICE #: 3639143
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JANUARY 31, 2025

TASK SUMMARY

TASK	TASK DESCRIPTION	HOURS	AMOUNT
B110	CASE ADMINISTRATION	8.90	6,007.50
B120	ASSET ANALYSIS AND RECOVERY	2.90	1,957.50
B210	BUSINESS OPERATIONS	0.90	607.50
B240	TAX ISSUES	7.90	5,332.50
B310	CLAIMS ADMINISTRATION & OBJECT	0.90	607.50
BT160	LITIGATION CONSULTING	2.70	1,822.50
TOTAL		24.20	16,335.00



400 Renaissance Center • Detroit, MI 48243 • EIN# 38-1446628

DEBORAH D WILLIAMSON
DEBORAH WILLIAMSON
112 E. PECAN
STE. 1800
SAN ANTONIO, TX 78205

DUE UPON RECEIPT

JANUARY 31, 2025
MATTER #: 122686.000001
INVOICE #: 3639144

FOR PROFESSIONAL SERVICES RENDERED

RE: RECEIVER'S TIME

FEES	\$	25,987.50
INVOICE TOTAL	\$	25,987.50



DEBORAH D WILLIAMSON
DEBORAH WILLIAMSON

MATTER #: 122686.000001
INVOICE #: 3639144
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JANUARY 31, 2025

RE: RECEIVER'S TIME

DATE	ID	DESCRIPTION	TASK	HOURS	AMOUNT
12/02/24	DDW	REVIEW AND EXECUTE TAX FORMS RELATED TO LIABILITY.	B240	1.00	675.00
12/02/24	DDW	ADDRESS ISSUES REGARDING ENTITY TERMINATION; REVIEW OF ORDER APPROVING PROCESS.	B110	0.60	405.00
12/02/24	DDW	APPROVE TRANSFERS FROM ACCOUNTS.	B110	0.30	202.50
12/03/24	DDW	PREPARE FOR AND ATTEND CONFERENCE WITH AHUJA & CONSULTANTS REGARDING TAX FILINGS, SOLVENCY ANALYSIS, SEC REQUESTS AND OTHER ISSUES; DRAFT AND RESPOND TO MULTIPLE EMAILS REGARDING SAME.	BT160	1.50	1,012.50
12/03/24	DDW	REVIEW OF REPORT REGARDING TRANSFER OF FUNDS AND OUTSTANDING PAYMENTS.	B110	0.40	270.00
12/04/24	DDW	REVIEW OF UPDATE REGARDING INJUNCTION RELATED TO CORPORATE TRANSPARENCY ACT AND DRAFT UPDATE TO AHUJA & CONSULTANTS REGARDING DEFERRAL OF FILINGS.	B110	1.10	742.50
12/04/24	DDW	REVIEW OF INFORMATION REGARDING ARCO OIL AND BARRON REGARDING INSOLVENCY ANALYSIS; CONFERENCE REGARDING SAME.	BT160	0.90	607.50
12/05/24	DDW	TELEPHONE CONFERENCE WITH MS. ROMERO REGARDING STATUS CONFERENCE; PREPARE FOR AND ATTEND STATUS CONFERENCE.	B110	1.00	675.00
12/05/24	DDW	CONFERENCE WITH TEXAS COMPTROLLER'S OFFICE REGARDING 2021 TEXAS FRANCHISE TAX RETURN FOR PANTHER CITY; DRAFT AND RESPOND TO EMAILS WITH AHUJA & CONSULTANTS REGARDING SAME.	B240	0.60	405.00
12/05/24	DDW	REVIEW OF REPORT REGARDING STATUS OF PAYMENTS AND "OUTSTANDING/NON-CASHED" CHECKS.	B310	0.40	270.00
12/05/24	DDW	REVIEW OF "CHECK LIST" FOR CLOSING OF CASES AND CONFERENCE WITH MS. DOUGLAS REGARDING SAME.	B110	0.70	472.50
12/05/24	DDW	DRAFT AND RESPOND TO EMAILS REGARDING IDENTIFICATION OF ENTITIES FOR INITIAL CLOSURE; CONFERENCES AND EMAILS REGARDING SAME.	B110	0.50	337.50
12/06/24	DDW	REVIEW AND APPROVE PROPOSED NOTICES REGARDING TERMINATION OF ENTITY; DRAFT AND RESPOND TO EMAILS REGARDING SAME.	B110	0.90	607.50
12/06/24	DDW	REVIEW AND RESPOND TO EMAILS REGARDING ALLEGEDLY	B310	0.40	270.00



DEBORAH D WILLIAMSON
DEBORAH WILLIAMSON

MATTER #: 122686.000001
INVOICE #: 3639144
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JANUARY 31, 2025

DATE	ID	DESCRIPTION	TASK	HOURS	AMOUNT
		LOST PAYMENTS AND/OR PAYMENTS IMPROPERLY DEPOSITED INCLUDING REVIEW OF CHECK REGISTERS AND OTHER RELATED DOCUMENTS.			
12/06/24	DDW	REVIEW AND RESPOND TO AHUJA & CONSULTANTS REGARDING TEXAS FRANCHISE TAX RETURNS FOR 2020 AND 2021.	B240	0.30	202.50
12/09/24	DDW	REVIEW OF SETTLEMENTS/AGREED ORDERS SEC OBTAINED FROM NON-RECEIVERSHIP PARTIES; REVIEW AND RESPOND TO EMAILS REGARDING SAME.	BT160	0.60	405.00
12/09/24	DDW	REVIEW AND REVISE NOTICE OF INTENT TO TERMINATE.	B110	0.40	270.00
12/09/24	DDW	REVIEW OF ANALYSIS REGARDING UNCASHED CHECKS; DRAFT AND RESPOND TO EMAILS REGARDING SAME.	B110	0.50	337.50
12/10/24	DDW	PREPARE FOR AND ATTEND CONFERENCE CALL WITH AHUJA & CONSULTANTS REGARDING TEXAS FRANCHISE TAXES FOR PANTHER CITY FOR 2020, CONFIRMATION OF FILING OF TAX RETURNS AND OTHER ISSUES.	B240	1.20	810.00
12/10/24	DDW	REVIEW OF SUMMARY TO BE PROVIDED TO SEC REGARDING SALES PROCEEDS; DRAFT AND RESPOND TO EMAILS REGARDING SAME.	B110	1.10	742.50
12/10/24	DDW	REVIEW AND RESPOND TO MULTIPLE EMAILS REGARDING UNCASHED PAYMENTS AND FUTURE DISTRIBUTIONS.	B110	0.80	540.00
12/10/24	DDW	REVIEW OF RESEARCH ON "INSOLVENCY" TESTS UNDER TEXAS FRAUDULENT CONVEYANCE STATUTE; CONFERENCE WITH MS. DOUGLAS REGARDING SAME.	BT160	0.90	607.50
12/11/24	DDW	REVIEW OF TRACING ANALYSIS OF FUNDS AND STANDARD OF REVIEW; CONFERENCES WITH MS. DOUGLAS REGARDING SAME.	B120	0.90	607.50
12/11/24	DDW	CONFERENCES AND EMAILS REGARDING RE-ISSUANCE OF CHECKS, NEW ROUND OF DISTRIBUTIONS AND OTHER ISSUES.	B110	1.10	742.50
12/11/24	DDW	REVIEW OF MEMORANDUM REGARDING CAUSES OF ACTION REGARDING BAHAMAS; CONFERENCES REGARDING SAME.	BT160	1.10	742.50
12/11/24	DDW	REVIEW, APPROVE AND EXECUTE TEXAS FRANCHISE TAX RETURN FOR 2020.	B240	0.90	607.50
12/11/24	DDW	REVIEW AND REVISE NOTICES OF NO OBJECTION REGARDING TERMINATION NOTICES; CONFERENCES REGARDING SAME.	B110	0.40	270.00
12/12/24	DDW	PREPARE FOR AND ATTEND CONFERENCE CALL WITH STRETTO REGARDING "MISSING" CHECKS OR PAYMENTS WHICH HAVE NOT BEEN PROCESSED; CONFERENCE WITH MS. DOUGLAS	B110	0.90	607.50



DEBORAH D WILLIAMSON
DEBORAH WILLIAMSON

MATTER #: 122686.000001
INVOICE #: 3639144
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JANUARY 31, 2025

DATE	ID	DESCRIPTION	TASK	HOURS	AMOUNT
		PROVIDING UPDATE AND NEXT STEPS REGARDING SAME.			
12/12/24	DDW	REVIEW OF UPDATE REGARDING CORPORATE TRANSPARENCY ACT.	B210	0.30	202.50
12/12/24	DDW	APPROVE NOTICE OF TERMINATION FOR PANTHER CITY; REVIEW AND RESPOND TO EMAILS REGARDING SAME.	B110	0.50	337.50
12/13/24	DDW	REVIEW AND RESPOND TO EMAILS REGARDING TRACING AND SOLVENCY ANALYSIS.	BT160	0.70	472.50
12/13/24	DDW	DRAFT AND RESPOND TO EMAILS WITH AHUJA & CONSULTANTS REGARDING "FINAL" TAX RETURNS.	B240	0.50	337.50
12/16/24	DDW	REVIEW AND REVISE MEMORANDUM REGARDING SOLVENCY ANALYSIS; CONFERENCE WITH MS. DOUGLAS REGARDING SAME.	BT160	0.90	607.50
12/16/24	DDW	REVIEW AND RESPOND TO SEC REQUEST REGARDING PROCEEDS FROM SALE OF ASSETS RELATED TO HEARTLAND ENTITIES.	B120	0.40	270.00
12/17/24	DDW	REVIEW AND APPROVE FRANCHISE TAX AND OTHER FILINGS WITH CALIFORNIA TAXING AUTHORITIES IN PREPARATION FOR DISSOLUTION OF ENTITY; DRAFT AND EXECUTE PAYMENTS (6) REGARDING SAME.	B240	1.00	675.00
12/17/24	DDW	PREPARE FOR AND ATTEND CONFERENCE WITH SEC RELATED TO POTENTIAL SETTLEMENTS.	B110	0.80	540.00
12/17/24	DDW	PREPARE FOR AND ATTEND MEETING WITH AHUJA & CONSULTANTS REGARDING TAXES, TAX RETURNS AND OTHER ISSUES.	B240	1.00	675.00
12/17/24	DDW	REVIEW AND RESPOND TO COMMUNICATIONS FROM AHUJA & CONSULTANTS REGARDING CLOSING OF CASES.	B110	0.40	270.00
12/18/24	DDW	REVIEW AND EXECUTE TEXAS FRANCHISE TAX RETURNS; CONFERENCE REGARDING SAME.	B240	0.70	472.50
12/18/24	DDW	REVIEW OF OUTLINE OF ISSUES FOR STATUS CONFERENCE; CONFERENCE REGARDING SAME.	B110	0.60	405.00
12/18/24	DDW	REVIEW OF ANALYSIS OF RECENT DECISIONS RELATED TO CONSTRUCTIVE FRAUDULENT CONVEYANCES.	BT160	0.60	405.00
12/19/24	DDW	CONFERENCES AND EMAILS REGARDING REISSUANCE OF CHECKS, ALLOCATION OF PAYMENTS AFTER DEATH OF INVESTOR AND OTHER ISSUES.	B310	0.70	472.50
12/20/24	DDW	MULTIPLE CONFERENCES AND EMAILS REGARDING ADDITIONAL W-9S, ISSUANCE OF REPLACEMENT AND NEW CHECKS, AND OTHER ISSUES.	B310	0.80	540.00



DEBORAH D WILLIAMSON
DEBORAH WILLIAMSON

MATTER #: 122686.000001
INVOICE #: 3639144
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JANUARY 31, 2025

DATE	ID	DESCRIPTION	TASK	HOURS	AMOUNT
12/20/24	DDW	REVIEW AND RESPOND TO POTENTIAL SEC PLEADING AND EMAILS RELATED TO SAME.	B310	0.40	270.00
12/20/24	DDW	REVIEW AND RESPOND TO INQUIRY REGARDING LACK OF PONZI DETERMINATION AND INVESTOR TAXES.	B310	0.20	135.00
12/23/24	DDW	MULTIPLE EMAILS AND CONFERENCES REGARDING FIFTH CIRCUIT DECISION REVIVING ENFORCEABILITY OF CORPORATE TRANSPARENCY ACT (CTA); REVIEW OF DECISION.	BT130	0.90	607.50
12/26/24	DDW	REVIEW AND EXECUTE NOTICES REGARDING 12/27 DISTRIBUTION; TELEPHONE CONFERENCE CONFIRMING SAME.	B310	0.80	540.00
12/26/24	DDW	REVIEW OF AUTHORITIES REGARDING OBLIGATION TO FILE NOTICES UNDER THE CORPORATE TRANSPARENCY ACT INCLUDING RECENT 5TH CIRCUIT DECISION VACATING NATIONAL INJUNCTION AND THE GUIDANCE EXTENDING THE DEADLINE TO FILE UNTIL JANUARY 13, 2025; TELEPHONE CONFERENCE WITH MR. GIFFORD REGARDING POTENTIAL EXCLUSIONS AND EXEMPTIONS AND ANY RECENTLY ISSUES FAQs; PREPARE FOR AND ATTEND TELEPHONE CONFERENCE WITH AHUJA & CONSULTANTS REGARDING CTA FILINGS; BEGIN INITIAL FILING TO OBTAIN A CENFIN IDENTIFICATION.	BT130	2.40	1,620.00
12/27/24	DDW	MULTIPLE EMAILS AND CONFERENCES REGARDING FIFTH CIRCUIT REINSTATEMENT OF INJUNCTION REGARDING ENFORCEMENT OF CORPORATE TRANSPARENCY ACT (CTA).	BT130	0.90	607.50
12/30/24	DDW	CONFERENCE AND EMAILS REGARDING DECEMBER 27 DISTRIBUTION.	B310	0.30	202.50
12/30/24	DDW	REVIEW AND APPROVE NOTICES OF NO OBJECTION REGARDING MOTION TO APPROVE TERMINATION PROCESS.	B110	0.20	135.00
12/30/24	DDW	CONFERENCE REGARDING FACTUAL SUPPORT FOR FRAUDULENT CONVEYANCE ACTION.	BT160	0.60	405.00
12/31/24	DDW	REVIEW OF 25TH REPORT FROM UNDERWOOD REGARDING STATUS OF VAL VERDE CROCKETT LEASES; DRAFT AND RESPOND TO EMAILS REGARDING SAME.	B110	0.50	337.50
TOTAL				38.50	\$25,987.50



DEBORAH D WILLIAMSON
DEBORAH WILLIAMSON

MATTER #: 122686.000001
INVOICE #: 3639144
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JANUARY 31, 2025

BILLING SUMMARY

ID	TIMEKEEPER	TITLE	HOURS	RATE	AMOUNT
DDW	DEBORAH WILLIAMSON	MEMBER	38.50	675.00	25,987.50
	TOTAL		38.50		\$25,987.50



DEBORAH D WILLIAMSON
DEBORAH WILLIAMSON

MATTER #: 122686.000001
INVOICE #: 3639144
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JANUARY 31, 2025

TASK SUMMARY

TASK	TASK DESCRIPTION	HOURS	AMOUNT
B110	CASE ADMINISTRATION	13.70	9,247.50
B120	ASSET ANALYSIS AND RECOVERY	1.30	877.50
B210	BUSINESS OPERATIONS	0.30	202.50
B240	TAX ISSUES	7.20	4,860.00
B310	CLAIMS ADMINISTRATION & OBJECT	4.00	2,700.00
BT130	BUSINESS ANALYSIS	4.20	2,835.00
BT160	LITIGATION CONSULTING	7.80	5,265.00
TOTAL		38.50	25,987.50



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DEBORAH D WILLIAMSON
DEBORAH WILLIAMSON
112 E. PECAN
STE. 1800
SAN ANTONIO, TX 78205

DUE UPON RECEIPT

JANUARY 31, 2025
MATTER #: 122686.000002
INVOICE #: 3639145

FOR PROFESSIONAL SERVICES RENDERED

RE: REPRESENTATION OF RECEIVERSHIP FOR THE HEARTLAND GROUP VENTURES LLC, ET AL

FEES	\$	64,980.70
DISBURSEMENTS		3,499.14
INVOICE TOTAL	\$	68,479.84



DEBORAH D WILLIAMSON
DEBORAH WILLIAMSON

MATTER #: 122686.000002
INVOICE #: 3639145
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JANUARY 31, 2025

RE: REPRESENTATION OF RECEIVERSHIP FOR THE HEARTLAND GROUP VENTURES LLC, ET AL

DATE	ID	DESCRIPTION	TASK	HOURS	AMOUNT
10/01/24	DADO	CORRESPONDENCE REGARDING HEARTLAND RECEIVERSHIP TEAM CHANGE WITH D. BEHREND'S.	B310	0.40	132.00
10/01/24	DADO	DRAFTING OF 2024 QUARTERLY REPORT AND REVISION OF SAME.	B110	2.70	891.00
10/01/24	DADO	CORRESPONDENCE WITH D. WILLIAMSON REGARDING CASE UPDATES FOR QUARTERLY REPORT.	B110	0.20	66.00
10/01/24	DADO	DRAFTING AND REVISION OF W-9 LETTER REGARDING SUBMISSION DATE.	B310	0.20	66.00
10/01/24	DADO	DRAFTING PLEADING REGARDING TERMINATION OF BUSINESS ENTITIES AND RESEARCH OF SAME.	B110	2.10	693.00
10/01/24	DADO	REVIEW AND RESPOND TO INVESTOR INQUIRIES.	B310	1.00	330.00
10/01/24	DNR	CORRESPONDENCE WITH STRETTO REGARDING DISTRIBUTION REPORT; REVIEW DRAFT OF SAME.	B130	0.50	175.00
10/01/24	DNR	CORRESPONDENCE WITH DEBORAH D. WILLIAMSON REGARDING DISTRIBUTION REPORT, OUTSTANDING W-9S, AND RELATED ITEMS.	B130	0.40	140.00
10/01/24	DNR	CORRESPONDENCE WITH SEC REGARDING ASSET CALCULATIONS.	B110	0.20	70.00
10/01/24	DNR	REVIEW AND PROCESS RECEIVER'S MAIL.	B210	0.50	175.00
10/01/24	TED	ADDRESS INVESTOR INQUIRIES.	B110	8.00	2,052.00
10/01/24	AMDO	REVIEW AND RESPOND TO INVESTOR INQUIRIES; SEND W-9S TO STRETTO.	B110	1.50	495.00
10/02/24	AMDO	REVIEW AND RESPOND TO INVESTOR INQUIRIES; SEND W-9S TO STRETTO.	B110	0.60	198.00
10/02/24	TED	ADDRESS INVESTOR INQUIRIES	B110	1.00	256.50
10/02/24	DADO	DRAFTING AND REVISION OF W-9 LETTER REGARDING UPDATED SUBMISSION DATE.	B310	1.80	594.00
10/02/24	DADO	CORRESPONDENCE WITH D. BEHREND'S AND STRETTO REGARDING DISTRIBUTION OF LETTER.	B310	0.30	99.00
10/02/24	DADO	REVISION AND RESEARCH ON MOTION TO TERMINATE.	B110	2.80	924.00
10/02/24	DADO	CALL WITH T. DICK AND A. LAFUENTE REGARDING MISSING W-9S.	B310	0.20	66.00



DEBORAH D WILLIAMSON
DEBORAH WILLIAMSON

MATTER #: 122686.000002
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JANUARY 31, 2025

DATE	ID	DESCRIPTION	TASK	HOURS	AMOUNT
10/02/24	DADO	REVIEW AND RESPOND TO INVESTOR INQUIRIES.	B310	0.30	99.00
10/02/24	ALAF	MULTIPLE EXTENSIVE TELECONFERENCES WITH T. DICK REGARDING INVESTOR INQUIRIES AND STRATEGIZE REGARDING TRACKING SAME.	B110	1.00	230.00
10/03/24	AMDO	REVIEW AND RESPOND TO INVESTOR INQUIRIES.	B110	0.20	66.00
10/03/24	DADO	CORRESPONDENCE WITH TEAM REGARDING LETTER TO MISSING W-9 CLAIMANTS.	B310	0.20	66.00
10/03/24	DADO	UPDATE INVESTOR ADDRESSES WITH STRETTO.	B310	0.60	198.00
10/03/24	DADO	CORRESPONDENCE WITH A. LAFUENTE REGARDING INVESTOR INQUIRIES.	B310	0.70	231.00
10/03/24	DADO	UPDATED INVESTOR SPREADSHEET WITH "NO CONTACT" INFORMATION.	B310	0.40	132.00
10/03/24	DADO	REVISION OF MOTION TO TERMINATE ENTITIES.	B110	1.60	528.00
10/03/24	DADO	CORRESPONDENCE WITH TEAM REGARDING NEXT STEPS FOR DISTRIBUTION.	B310	0.80	264.00
10/03/24	DADO	REVIEW AND RESPOND TO INVESTOR INQUIRIES.	B310	0.30	99.00
10/03/24	DNR	CORRESPONDENCE WITH DEBORAH D. WILLIAMSON REGARDING EVIDENTIARY HEARING SUBPOENA AND REQUESTED DOCUMENTS FROM IA.	BT160	0.50	175.00
10/03/24	DNR	RECEIVE AND REVIEW SUBPOENA TO RECEIVER FOR IA EVIDENTIARY HEARING.	BT160	0.30	105.00
10/03/24	DNR	CORRESPONDENCE WITH IA ENFORCEMENT COUNSEL REGARDING REQUESTED INFORMATION AND SUBPOENA.	B110	0.20	70.00
10/03/24	DNR	ADDRESS OPEN DISTRIBUTION ITEMS WITH TEAM.	B130	0.40	140.00
10/03/24	DNR	CORRESPONDENCE WITH STRETTO REGARDING REQUESTED CLAIM FILE.	B310	0.20	70.00
10/03/24	ALAF	ADDRESS MULTIPLE INVESTOR INQUIRIES AND UPDATE RECORD-KEEPING SPREADSHEETS REGARDING SAME.	B110	4.00	920.00
10/04/24	ALAF	CONFER WITH T. DICK REGARDING INVESTOR INQUIRIES AND ADDRESS SAME WITH MULTIPLE INVESTORS; UPDATE RECORD-KEEPING SPREADSHEETS BASED ON SAME.	B110	4.00	920.00
10/04/24	ALAF	DRAFT GENERALIZED RESPONSES TO INVESTOR INQUIRIES.	B110	2.00	460.00
10/04/24	ALAF	CONFER AND STRATEGIZE WITH A. DOMINGUEZ REGARDING INVESTOR INQUIRIES.	B110	0.50	115.00
10/04/24	AMDO	REVIEW AND RESPOND TO INVESTOR INQUIRIES.	B110	1.00	330.00



DEBORAH D WILLIAMSON
DEBORAH WILLIAMSON

MATTER #: 122686.000002
INVOICE #: 3639145
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JANUARY 31, 2025

DATE	ID	DESCRIPTION	TASK	HOURS	AMOUNT
10/04/24	DADO	MAKE EDITS TO THE THIRD QUARTERLY REPORT.	B110	1.80	594.00
10/04/24	DADO	CORRESPONDENCE WITH OTHER COUNSEL REGARDING EDITS TO THE THIRD QUARTERLY REPORT.	B110	0.30	99.00
10/04/24	DADO	CALL WITH A. LAFUENTE REGARDING INVESTOR CORRESPONDENCE.	B310	0.60	198.00
10/04/24	DADO	REVIEW AND RESPOND TO INVESTOR INQUIRIES.	B310	0.70	231.00
10/04/24	DADO	CALL WITH D. BEHREND'S REGARDING INVESTOR INQUIRIES.	B310	0.20	66.00
10/04/24	DADO	DRAFT AND REVISE MOTION TO TERMINATE.	B110	1.80	594.00
10/04/24	DNR	ADDRESS DISTRIBUTION REPORT AND OUTSTANDING CHECK ISSUES WITH TEAM AND STRETTO.	B130	0.70	245.00
10/04/24	DNR	CORRESPONDENCE WITH INVESTOR COUNSEL REGARDING DISTRIBUTION INQUIRIES.	B110	0.30	105.00
10/04/24	DNR	REVIEW AND PROCESS RECEIVER'S MAIL.	B210	0.80	280.00
10/04/24	DNR	ADDRESS INVESTOR ADDRESS DISCREPANCIES AND ISSUES WITH STRETTO.	B110	0.30	105.00
10/07/24	DNR	REVIEW AND RESPOND TO INVESTOR INQUIRIES.	B110	0.30	105.00
10/07/24	DNR	RECEIVE AND PROCESS RECEIVER'S MAIL.	B210	0.30	105.00
10/07/24	DADO	REVIEW AND RESPOND TO INVESTOR INQUIRIES.	B110	1.90	627.00
10/07/24	DADO	CORRESPONDENCE WITH STRETTO AND A. DOMINGUEZ REGARDING DISTRIBUTION CHECKS.	B310	0.30	99.00
10/07/24	DADO	EDIT RECEIVER'S MOTION TO APPROVE FEES FOR THIRD QUARTER.	B110	0.30	99.00
10/07/24	ALAF	ATTEND TO INVESTOR INQUIRIES.	B110	3.50	805.00
10/08/24	AMDO	REVIEW AND RESPOND TO INVESTOR INQUIRIES.	B110	0.30	99.00
10/08/24	DADO	REVIEW AND RESPOND TO INVESTOR INQUIRIES.	B310	1.20	396.00
10/08/24	DADO	DRAFT AND REVISE NOTICE OF DISBURSEMENT.	B110	1.40	462.00
10/08/24	DADO	MAKE EDITS TO THE THIRD QUARTERLY REPORT.	B110	0.60	198.00
10/08/24	DADO	REVISION OF MOTION TO TERMINATE ENTITIES.	B110	2.60	858.00
10/08/24	ALAF	ATTEND TO INVESTOR INQUIRIES.	B110	2.50	575.00
10/09/24	ALAF	ATTEND TO INVESTOR INQUIRIES; MULTIPLE TELECONFERENCES WITH D. DOUGLAS REGARDING SAME.	B110	3.50	805.00
10/09/24	DNR	CORRESPONDENCE WITH DEBORAH D. WILLIAMSON AND SEC COUNSEL REGARDING STATUS CONFERENCE.	B110	0.20	70.00



DEBORAH D WILLIAMSON
DEBORAH WILLIAMSON

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DATE	ID	DESCRIPTION	TASK	HOURS	AMOUNT
10/09/24	DNR	REVIEW COURT ORDER SETTING STATUS CONFERENCE.	B110	0.10	35.00
10/09/24	DNR	CORRESPONDENCE WITH CONTRACT OPERATOR REGARDING INVOICE FOR 2Q2024.	B210	0.20	70.00
10/09/24	DNR	CORRESPONDENCE WITH DEBORAH D. WILLIAMSON REGARDING TAX STATEMENTS FOR VARIOUS COUNTIES.	B240	0.10	35.00
10/09/24	DNR	RECEIVE AND PROCESS RECEIVER'S MAIL.	B210	0.40	140.00
10/09/24	DADO	CORRESPONDENCE WITH DWILLIAMSON AND RETAINED COUNSEL REGARDING QUARTERLY REPORT.	B110	0.90	297.00
10/09/24	DADO	DRAFTED NOTICE OF HEARING AND CERTIFICATE OF SERVICE FOR STATUS CONFERENCE.	B110	1.00	330.00
10/09/24	DADO	FILE NOTICE OF HEARING.	B110	0.20	66.00
10/09/24	DADO	DRAFTED STATUS REPORT FOR OCTOBER 17TH HEARING.	BT155	0.90	297.00
10/09/24	DADO	REVIEW AND RESPOND TO INVESTOR INQUIRIES.	B310	0.60	198.00
10/09/24	DADO	REVISION OF MOTION TO TERMINATE ENTITIES.	B110	0.60	198.00
10/09/24	DADO	STATUS CALL WITH DWILLIAMSON.	B110	0.40	132.00
10/09/24	DADO	CORRESPONDENCE WITH RECEIVERSHIP TEAM REGARDING DISTRIBUTION.	B310	0.40	132.00
10/09/24	DADO	DRAFTING OF CHART WITH PAYMENT SCHEDULES DUE TO RECEIVER FROM RELIEF DEFENDANTS.	B110	0.30	99.00
10/09/24	DADO	REVIEWED LIST OF CLASS 4 AND CLASS 4A INVESTORS CLASSIFIED AS "HOLD" FOR MISSING W-9S.	B310	0.80	264.00
10/09/24	DADO	CORRESPONDENCE WITH ALAFUENTE REGARDING W-9 PROCESSING.	B310	0.30	99.00
10/09/24	DADO	FILE NOTICE OF HEARING AND CERTIFICATE OF SERVICE.	B110	0.10	33.00
10/09/24	DADO	CORRESPONDENCE WITH D. BEHREND'S REGARDING STATUS OF NOTICE OF HEARING AND STATUS REPORT.	B110	0.20	66.00
10/09/24	DADO	CORRESPONDENCE REQUESTING EXHIBITS FROM LOCAL COUNSEL AND RETRIEVAL OF THE SAME.	B110	0.20	66.00
10/09/24	DADO	SEARCH FOR DOCUMENTS RELATED TO DOCUMENT REQUEST.	BT160	1.40	462.00
10/10/24	AMDO	REVIEW AND RESPOND TO INVESTOR INQUIRIES.	B110	0.40	132.00
10/10/24	DNR	CALL WITH SEC COUNSEL REGARDING STATUS CONFERENCE.	B110	0.30	105.00
10/10/24	DNR	ADDRESS IOWA REQUEST FOR INFORMATION TO RECEIVER ITEMS.	BT160	0.50	175.00
10/10/24	DNR	CORRESPONDENCE WITH IOWA ENFORCEMENT COUNSEL	BT160	0.40	140.00



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DATE	ID	DESCRIPTION	TASK	HOURS	AMOUNT
		REGARDING SUBPOENA FOR RECEIVER.			
10/10/24	DNR	CORRESPONDENCE WITH ROSE ROMERO REGARDING SUBPOENA AND REQUESTED INFORMATION.	BT160	0.20	70.00
10/10/24	DADO	REVIEW AND RESPOND TO INVESTOR INQUIRIES.	B310	0.70	231.00
10/10/24	DADO	LOCATE DOCUMENTS FOR IOWA'S SUBPOENA TO D. WILLIAMSON.	BT160	1.00	330.00
10/10/24	DADO	CORRESPONDENCE WITH D. BEHREND'S REGARDING DOCUMENT PRODUCTION.	BT160	0.30	99.00
10/10/24	DADO	REVISION OF MOTION TO TERMINATE ENTITIES.	B110	0.70	231.00
10/10/24	DADO	REVISED STATUS REPORT FOR OCTOBER 17TH HEARING.	BT155	1.60	528.00
10/10/24	DADO	CONFERENCE CALL WITH THE COMMISSION REGARDING STATUS OF CASE.	BT155	0.30	99.00
10/10/24	DADO	CORRESPONDENCE WITH D. WILLIAMSON, D. BEHREND'S AND LOCAL COUNSEL REGARDING SUBPOENA.	BT160	0.40	132.00
10/10/24	JCGI	ATTEND TO CTA ANALYSIS FOR RECEIVERSHIP.	B210	0.20	115.20
10/11/24	AMDO	RECEIVE AND RESPOND TO INVESTOR INQUIRIES; COMMUNICATE WITH RECEIVER AND STRETTO REGARDING COMPLEX BENEFICIARY SITUATION.	B110	0.60	198.00
10/11/24	DNR	RECEIVE AND PROCESS RECEIVER'S MAIL.	B210	0.40	140.00
10/11/24	DADO	CORRESPONDENCE WITH OTHER COUNSEL REGARDING QUARTERLY REPORT.	B110	0.30	99.00
10/11/24	DADO	CORRESPONDENCE WITH STRETTO REGARDING FEE APPLICATIONS.	B110	0.30	99.00
10/11/24	DADO	CORRESPONDENCE WITH ALANNA DOMINGUEZ REGARDING DISTRIBUTIONS AND W9 STATUS.	B310	0.20	66.00
10/12/24	DADO	REVIEW AND RESPOND TO INVESTOR INQUIRIES.	B310	0.30	99.00
10/14/24	AMDO	REVIEW AND RESPOND TO INVESTOR INQUIRES; SEND W-9 TO STRETTO.	B110	0.30	99.00
10/14/24	DNR	REVIEW AND RESPOND TO INVESTOR INQUIRIES.	B110	0.80	280.00
10/14/24	DNR	CORRESPONDENCE WITH IOWA ENFORCEMENT COUNSEL REGARDING EVIDENTIARY HEARING AND REQUESTED INFORMATION.	B110	0.20	70.00
10/14/24	DNR	REVIEW AND RECEIVE WAB SEPTEMBER 2024 STATEMENTS; SEND TO AHUJA & CONSULTANTS.	B210	0.50	175.00
10/14/24	DNR	CORRESPONDENCE WITH DEBORAH D. WILLIAMSON	B210	0.20	70.00



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DATE	ID	DESCRIPTION	TASK	HOURS	AMOUNT
		REGARDING BANK ACCOUNTS.			
10/14/24	DNR	RECEIVE AND REVIEW IBC BANK SEPTEMBER 2024 STATEMENT; SEND TO AHUJA & CONSULTANTS.	B210	0.30	105.00
10/14/24	DNR	REVIEW AND PROCESS RECEIVER'S MAIL.	B210	0.40	140.00
10/14/24	DNR	CALL WITH DOMINIQUE DOUGLAS REGARDING ASSET TRACING.	B120	0.20	70.00
10/14/24	DNR	CORRESPONDENCE WITH DEBORAH D. WILLIAMSON REGARDING PROPERTY TAX STATEMENTS AND ABANDONED ASSETS.	B240	0.20	70.00
10/14/24	DNR	CORRESPONDENCE WITH STRETTO REGARDING STOP PAYMENT NOTICES.	B210	0.20	70.00
10/14/24	DNR	DRAFT AND REVISE STATUS REPORT.	BT155	1.10	385.00
10/14/24	DNR	CALL WITH DOMINIQUE DOUGLAS REGARDING ADDITIONAL EDITS TO STATUS REPORT.	BT155	0.20	70.00
10/14/24	DADO	REVISE STATUS REPORT FOR STATUS CONFERENCE.	BT155	4.40	1,452.00
10/14/24	DADO	CORRESPONDENCE WITH DEBORAH D. WILLIAMSON REGARDING STATUS CONFERENCE AND REPORT.	BT155	0.20	66.00
10/14/24	DADO	REVISE MOTION TO TERMINATE ENTITIES.	B110	2.10	693.00
10/14/24	DADO	DRAFT LETTER TO OIL AND GAS COUNSEL.	B210	0.20	66.00
10/14/24	DADO	REVIEW AND RESPOND TO INVESTOR INQUIRIES.	B310	0.70	231.00
10/14/24	DADO	CORRESPONDENCE WITH AHUJA & CONSULTANTS REGARDING QUARTERLY REPORT.	BT160	0.10	33.00
10/14/24	DADO	CORRESPONDENCE WITH DANIELLE BEHREND'S REGARDING STATUS REPORT.	BT160	0.50	165.00
10/14/24	DADO	MAKE EDITS TO THE THIRD QUARTERLY REPORT.	B110	0.50	165.00
10/15/24	ALAF	REVIEW AND RESPOND TO INVESTOR INQUIRIES.	B110	2.50	575.00
10/15/24	JCGI	ATTEND TO CTA ANALYSIS MATTERS FOR FILINGS.	B210	0.30	172.80
10/15/24	MGC	REVIEW OF RECEIVER'S REPORT TO COURT; ATTENTION TO SAME; REVISIONS TO SAME; ADVICE TO MS. WILLIAMSON REGARDING SAME; RELATED EMAILS.	B240	0.80	518.40
10/15/24	DADO	CORRESPONDENCE WITH DEBORAH D. WILLIAMSON REGARDING MOTION TO TERMINATE AND SENDING OF SAME.	B110	0.20	66.00
10/15/24	DADO	REVIEW AND RESPOND TO INVESTOR INQUIRIES.	B310	1.10	363.00
10/15/24	DADO	CORRESPONDENCE WITH DEBORAH D. WILLIAMSON REGARDING QUARTERLY REPORT AND SENDING OF SAME.	B110	0.30	99.00



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10/15/24	DADO	CORRESPONDENCE WITH DEBORAH D.WILLIAMSON REGARDING STATUS REPORT AND SENDING OF SAME.	BT155	0.30	99.00
10/15/24	DADO	MEETING WITH AHUJA & CONSULTANTS AND DEBORAH D. WILLIAMSON REGARDING QUARTERLY REPORT.	B240	0.20	66.00
10/15/24	DADO	REVISED STATUS REPORT FOR STATUS CONFERENCE.	BT155	0.30	99.00
10/15/24	DADO	MAKE EDITS TO THE THIRD QUARTERLY REPORT.	B110	0.80	264.00
10/15/24	DADO	CORRESPONDENCE WITH OTHER COUNSEL REGARDING SUBPOENA.	BT160	0.20	66.00
10/15/24	DADO	DRAFT LETTER TO INVESTOR REGARDING NET DISTRIBUTION AMOUNT.	B310	0.80	264.00
10/16/24	DNR	UPDATE WEBSITE CONTENT.	B110	0.40	140.00
10/16/24	DNR	ADDRESS INVESTOR CORRESPONDENCE ITEMS WITH TEAM.	B110	0.20	70.00
10/16/24	DNR	REVIEW AND PROCESS RECEIVER'S MAIL.	B210	0.50	175.00
10/16/24	DNR	CORRESPONDENCE WITH DEBORAH D. WILLIAMSON AND AHUJA & CONSULTANTS REGARDING IRS SUMMONS.	B240	0.20	70.00
10/16/24	DADO	DRAFT LETTER TO INVESTOR REGARDING NET DISTRIBUTION AMOUNT AND SENDING OF SAME.	B310	1.60	528.00
10/16/24	DADO	DRAFT NOTICE OF DISTRIBUTION FOR FILING WITH COURT.	B310	0.30	99.00
10/16/24	DADO	REVIEW AND RESPOND TO INVESTOR INQUIRIES.	B310	0.60	198.00
10/16/24	DADO	CORRESPONDENCE WITH STRETTO REGARDING DISTRIBUTION.	B310	0.20	66.00
10/16/24	DADO	REVISED STATUS REPORT FOR STATUS CONFERENCE.	BT155	0.40	132.00
10/16/24	DADO	FINALIZE AND FILE STATUS REPORT WITH COURT.	BT155	0.20	66.00
10/16/24	DADO	MAKE EDITS TO THE THIRD QUARTERLY REPORT.	B110	0.40	132.00
10/16/24	ALAF	REVIEW AND RESPOND TO INVESTOR INQUIRIES	B110	1.80	414.00
10/17/24	AMDO	REVIEW AND RESPOND TO INVESTOR INQUIRIES.	B110	0.20	66.00
10/17/24	DADO	REVIEW AND RESPOND TO INVESTOR INQUIRIES.	B310	1.00	330.00
10/17/24	DADO	MAKE EDITS TO THE THIRD QUARTERLY REPORT.	B110	1.70	561.00
10/17/24	DADO	REVISE NOTICE OF DISTRIBUTION FOR FILING WITH COURT.	B310	0.20	66.00
10/17/24	DADO	PREPARE 3QR2024 AND EXHIBIT FOR FILING.	B110	0.10	33.00
10/17/24	DADO	CALL WITH DEBORAH D. WILLIAMSON AND OTHER COUNSEL REGARDING THE STATUS CONFERENCE AND PREPARATION REGARDING THE SAME.	B110	0.40	132.00
10/17/24	DADO	DRAFT RESPONSE FOR IRS SUMMONS REGARDING DOCUMENT	BT160	1.10	363.00



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		PRODUCTION.			
10/17/24	DADO	REVISION OF MOTION TO TERMINATE ENTITIES.	B110	1.00	330.00
10/17/24	DADO	ATTEND STATUS CONFERENCE.	B110	0.70	231.00
10/17/24	JCGI	ATTEND TO MOTION REVIEW FOR ENTITY TERMINATION.	B210	0.20	115.20
10/18/24	AMDO	REVIEW AND RESPOND TO INVESTOR INQUIRIES.	B110	0.30	99.00
10/18/24	DADO	REVIEW AND RESPOND TO INVESTOR INQUIRIES AND UPDATE THE CALL LOG REGARDING THE SAME.	B310	1.80	594.00
10/18/24	DADO	REVISE NOTICE OF DISTRIBUTION FOR FILING WITH COURT.	B310	0.30	99.00
10/18/24	DNR	RECEIVE AND PROCESS RECEIVER'S MAIL.	B210	0.30	105.00
10/18/24	ALAF	REVIEW AND RESPOND TO INVESTOR INQUIRIES.	B110	2.50	575.00
10/20/24	MGC	REVIEW AND REVISE RECEIVER'S MOTION TO APPROVE PROCEDURES FOR TERMINATING BUSINESS RECEIVERSHIP ENTITIES; RELATED EMAILS WITH RECEIVER.	B240	1.30	842.40
10/21/24	DNR	REVIEW AND PROCESS RECEIVER'S MAIL.	B210	0.30	105.00
10/21/24	DNR	ADDRESS DISBURSEMENT INQUIRIES OF INVESTORS WITH TEAM.	B130	0.20	70.00
10/21/24	JCGI	REVIEW AND REVISE MOTION TO TERMINATE BUSINESS ENTITIES.	B210	1.20	691.20
10/21/24	DADO	CORRESPONDENCE WITH OUTSIDE COUNSEL REGARDING FEE APPLICATION.	B110	0.20	66.00
10/21/24	DADO	DRAFTED CERTIFICATE OF SERVICE FOR NOVEMBER STATUS CONFERENCE AND FILING OF THE SAME.	B110	0.40	132.00
10/21/24	DADO	REVISION OF NOTICE OF DISTRIBUTION AND FILING OF THE SAME.	B310	0.40	132.00
10/21/24	DADO	REVISION OF MOTION TO TERMINATE ENTITIES.	B110	3.00	990.00
10/21/24	DADO	REVIEW AND RESPOND TO INVESTOR INQUIRIES.	B310	0.90	297.00
10/21/24	DADO	FINALIZE LETTER TO THE IRS REGARDING SUMMONS RECEIVED ON OCT, 17, 2024.	B240	0.30	99.00
10/21/24	DADO	CORRESPONDENCE WITH D.WILLIAMSON REGARDING PENDING MOTIONS AND FILING OF SAME.	B110	0.20	66.00
10/21/24	DADO	EMAIL CORRESPONDENCE WITH A.LAFUENTE REGARDING OUTSTANDING INVESTOR INQUIRIES.	B310	0.20	66.00
10/21/24	DADO	CORRESPONDENCE WITH D.BEHREND'S REGARDING INVESTOR INQUIRIES.	B310	0.20	66.00



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DATE	ID	DESCRIPTION	TASK	HOURS	AMOUNT
10/21/24	ALAF	ATTEND TO INVESTOR INQUIRIES.	B110	1.50	345.00
10/22/24	AMDO	REVIEW AND RESPOND TO INVESTOR INQUIRIES.	B110	0.30	99.00
10/22/24	DNR	UPDATE DISTRIBUTION CONTENT ON WEBSITE.	B110	0.40	140.00
10/22/24	DNR	CALL REGARDING REQUESTED INFORMATION AND DOCUMENT PRODUCTION IN RESPONSE TO SUBPOENA.	BT160	0.50	175.00
10/22/24	ALAF	REVIEW AND PREPARE DOCUMENTS RELATED TO IOWA'S SUBPOENA FOR PRODUCTION OF DOCUMENTS.	BT160	4.00	920.00
10/22/24	DADO	FINALIZE PACKAGE TO SEND TO THE IRS FOR D.WILLIAMSON'S SUBPOENA RE: IGROUP.	BT160	0.10	33.00
10/22/24	DADO	CORRESPONDENCE WITH D.WILLIAMSON AND D.BEHREND'S REGARDING IOWA SUBPOENA/DOCUMENT PRODUCTION.	BT160	0.10	33.00
10/22/24	DADO	DRAFT LETTER RESPONDING TO IOWA'S SUBPOENA TO PRODUCE DOCUMENTS.	BT160	2.40	792.00
10/22/24	DADO	COMPILE AND REVIEW DOCUMENTS RELATED TO IOWA'S SUBPOENA TO PRODUCE DOCUMENTS.	BT160	0.30	99.00
10/22/24	DADO	EMAIL CORRESPONDENCE WITH A.LAFUENTE REGARDING OUTSTANDING INVESTOR INQUIRIES.	B310	0.50	165.00
10/22/24	DADO	REVIEW AND RESPOND TO INVESTOR INQUIRIES.	B310	1.00	330.00
10/22/24	DADO	REVIEW AND ANALYZE DOCUMENTS TO RESPOND TO INVESTOR INQUIRIES.	B310	0.70	231.00
10/22/24	DADO	REVISION OF MOTION TO TERMINATE ENTITIES.	B110	1.70	561.00
10/22/24	ALAF	RESPOND AND ATTEND TO INVESTOR INQUIRIES.	B110	1.80	414.00
10/23/24	ALAF	PREPARE AND FINALIZE DOCUMENTS RELATED TO IOWA'S SUBPOENA FOR PRODUCTION OF DOCUMENTS.	BT160	2.50	575.00
10/23/24	DNR	CORRESPONDENCE WITH SEC REGARDING ACCOUNT QUESTIONS AND ANALYSIS REQUEST; CORRESPONDENCE WITH AHUJA & CONSULTANTS ON SAME.	B110	0.60	210.00
10/23/24	DNR	ADDRESS LIABILITY ISSUES WITH RECEIVER AND RESOLUTION OF SAME.	B210	0.50	175.00
10/23/24	DNR	CORRESPONDENCE WITH STRETTO REGARDING DISTRIBUTION INQUIRY OF INVESTOR COUNSEL.	B130	0.20	70.00
10/23/24	DNR	CORRESPONDENCE WITH INVESTOR COUNSEL REGARDING DISTRIBUTION INQUIRY.	B110	0.20	70.00
10/23/24	DNR	CORRESPONDENCE WITH DEBORAH D. WILLIAMSON REGARDING PROPERTY TAXES AND NOTICES RECEIVED REGARDING ABANDONED PROPERTIES.	B240	0.50	175.00

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DATE	ID	DESCRIPTION	TASK	HOURS	AMOUNT
10/23/24	DNR	REVIEW AND PROCESS RECEIVER’S MAIL.	B210	0.40	140.00
10/23/24	DNR	CORRESPONDENCE TO OIL AND GAS COUNSEL REGARDING NEW RAILROAD COMMISSION FINAL ORDERS.	B210	0.10	35.00
10/23/24	DNR	DISCUSS DOCUMENT PRODUCTION PURSUANT TO SUBPOENA WITH RECEIVER.	BT160	0.20	70.00
10/23/24	DNR	CORRESPONDENCE WITH IOWA ENFORCEMENT COUNSEL REGARDING DOCUMENT PRODUCTION AND RESPONSE TO SUBPOENA.	B110	0.50	175.00
10/23/24	DNR	REVIEW AND RESPOND TO INVESTOR INQUIRIES.	B110	0.30	105.00
10/23/24	DADO	REVIEW AND ANALYZE DOCUMENTS TO RESPOND TO INVESTOR INQUIRIES.	B310	0.30	99.00
10/23/24	DADO	REVIEW AND RESPOND TO INVESTOR INQUIRIES.	B310	0.60	198.00
10/23/24	DADO	REVISE OF MOTION TO TERMINATE ENTITIES.	B110	0.60	198.00
10/23/24	DADO	REVIEW POTENTIAL IOWA DOCUMENT PRODUCTION FOR SUBPOENA.	BT160	1.40	462.00
10/23/24	DADO	RESEARCH LIABILITY ISSUES FOR OWNERS AFTER POTENTIAL TERMINATION OF ENTITIES THAT OWN WELLS FOR MOTION TO TERMINATE.	B110	1.10	363.00
10/23/24	DADO	MEETING WITH D.WILLIAMSON REGARDING LIABILITY RESEARCH FINDINGS.	B110	0.10	33.00
10/23/24	DADO	COMPILE AND REVIEW DOCUMENTS RELATED TO IOWA'S SUBPOENA TO PRODUCE DOCUMENTS.	BT160	1.70	561.00
10/23/24	DADO	REVISE LETTER RESPONDING TO IOWA'S SUBPOENA TO PRODUCE DOCUMENTS.	BT160	1.90	627.00
10/23/24	DADO	DRAFT AND SEND COMPLETED DOCUMENT PRODUCTION TO COUNSEL FOR IOWA.	BT160	0.20	66.00
10/23/24	DADO	EMAIL CORRESPONDENCE WITH A.LAFUENTE REGARDING DOCUMENT PRODUCTION FOR IOWA.	BT160	0.20	66.00
10/24/24	DNR	CORRESPONDENCE WITH IOWA ENFORCEMENT COUNSEL REGARDING EVIDENTIARY HEARING AND WITNESSES.	B110	0.20	70.00
10/24/24	DNR	CORRESPONDENCE WITH RECEIVER REGARDING EVIDENTIARY HEARING WITNESSES.	BT160	0.40	140.00
10/24/24	DADO	REVIEW AND RESPOND TO INVESTOR INQUIRIES.	B310	1.00	330.00
10/24/24	DADO	REVIEW AND ANALYZE DOCUMENTS TO RESPOND TO INVESTOR INQUIRIES.	B310	1.00	330.00
10/24/24	DADO	EMAIL CORRESPONDENCE WITH D.WILLIAMSON, D.BEHREND.	BT160	0.30	99.00



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		AND LOCAL COUNSEL REGARDING IOWA SUBPOENA PREP.			
10/24/24	DADO	REVISION OF MOTION TO TERMINATE ENTITIES.	B110	0.90	297.00
10/24/24	DADO	EMAIL CORRESPONDENCE WITH IOWA COUNSEL REGARDING IOWA SUBPOENA.	BT160	0.10	33.00
10/24/24	DADO	EMAIL TO COUNSEL FOR THE SEC REGARDING DRAFT MOTION TO TERMINATE.	B110	0.10	33.00
10/24/24	ALAF	ATTEND AND RESPOND TO INVESTOR INQUIRIES.	B110	1.00	230.00
10/25/24	AMDO	REVIEW AND RESPOND TO INVESTOR INQUIRIES.	B110	0.10	33.00
10/25/24	DNR	CORRESPONDENCE WITH RECEIVER REGARDING PREPARATION FOR EVIDENTIARY HEARING.	BT160	0.20	70.00
10/25/24	DNR	CORRESPONDENCE TO IA ENFORCEMENT COUNSEL REGARDING PREPARATION FOR EVIDENTIARY HEARING.	B110	0.10	35.00
10/25/24	DNR	CALL WITH DOMINIQUE DOUGLAS REGARDING LETTERS TO CADS AND ABANDONED PROPERTY TAX ISSUES.	B240	0.30	105.00
10/25/24	DADO	REVIEW AND RESPOND TO INVESTOR INQUIRIES.	B310	0.70	231.00
10/25/24	DADO	REVIEW AND ANALYZE DOCUMENTS TO RESPOND TO INVESTOR INQUIRIES.	B310	0.50	165.00
10/25/24	DADO	DRAFT LETTERS AND COMPILE DOCUMENTS TO SEND TO VARIOUS COUNTY TAX OFFICES REGARDING CADS.	B240	2.60	858.00
10/25/24	ALAF	ATTEND TO INVESTOR INQUIRIES.	B110	0.40	92.00
10/28/24	AMDO	REVIEW AND RESPOND TO INVESTOR INQUIRIES.	B110	0.50	165.00
10/28/24	DNR	CORRESPONDENCE WITH STRETTO REGARDING CLASS 5 DISTRIBUTION CHECK INQUIRY.	B130	0.20	70.00
10/28/24	DNR	CORRESPONDENCE WITH CLASS 5 CREDITOR REGARDING DISTRIBUTION CHECKS AND INQUIRY ON SAME.	B110	0.40	140.00
10/28/24	DNR	CALL WITH DOMINIQUE DOUGLAS REGARDING BAHAMAS TRANSFERS AND RECEIVERSHIP ORDER.	B120	0.30	105.00
10/28/24	DNR	CORRESPONDENCE WITH RECEIVER REGARDING EVIDENTIARY HEARING WITNESSES.	BT160	0.20	70.00
10/28/24	DNR	CORRESPONDENCE WITH IOWA ENFORCEMENT COUNSEL REGARDING EVIDENTIARY HEARING AND WITNESSES.	BT160	0.40	140.00
10/28/24	DNR	REVIEW AND RESPOND TO INVESTOR INQUIRIES.	B110	0.20	70.00
10/28/24	DADO	REVISE LETTERS AND COMPILE DOCUMENTS TO SEND TO VARIOUS COUNTY TAX OFFICES REGARDING CADS.	B240	0.40	132.00
10/28/24	DADO	REVIEW AND ANALYZE DOCUMENTS TO RESPOND TO	B310	0.70	231.00



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DATE	ID	DESCRIPTION	TASK	HOURS	AMOUNT
		INVESTOR INQUIRIES.			
10/28/24	DADO	REVIEW AND RESPOND TO INVESTOR INQUIRIES.	B310	1.30	429.00
10/28/24	DADO	REVIEW DRAFT BAHAMAS PLEADING FOR MEETING WITH DWILLIAMSON.	B110	0.50	165.00
10/28/24	DADO	REVISE FAQs FOR HEARTLAND WEBSITE.	BT155	1.20	396.00
10/28/24	DADO	DRAFT LETTERS AND COMPILE DOCUMENTS TO SEND TO VARIOUS COUNTY TAX OFFICES REGARDING CADS.	B240	1.50	495.00
10/28/24	DADO	CORRESPONDENCE WITH COUNSEL FOR THE SEC REGARDING MOTION TO TERMINATE.	B110	0.10	33.00
10/28/24	DADO	CORRESPONDENCE WITH D.WILLIAMSON AND M.MCINTYRE REGARDING POTENTIAL LITIGATION.	BT160	0.10	33.00
10/29/24	AMDO	REVIEW AND RESPOND TO INVESTOR INQUIRIES.	B110	0.10	33.00
10/29/24	ALAF	ATTEND TO INVESTOR INQUIRIES.	B110	0.70	161.00
10/29/24	DNR	CORRESPONDENCE WITH IOWA ENFORCEMENT COUNSEL REGARDING DOCUMENT PRODUCTION AND EVIDENTIARY HEARING.	BT160	0.60	210.00
10/29/24	DADO	CORRESPONDENCE WITH RUSTIN'S COUNSEL AND RUSTIN REGARDING MOTION TO TERMINATE.	B110	0.20	66.00
10/29/24	DADO	REVIEW AND RESPOND TO INVESTOR INQUIRIES.	B310	0.50	165.00
10/29/24	DADO	REVIEW AND ANALYZE DOCUMENTS TO RESPOND TO INVESTOR INQUIRIES.	B310	0.30	99.00
10/29/24	DADO	EDIT AND PRODUCE ADDITIONAL DOCUMENTS TO IOWA.	BT160	0.90	297.00
10/29/24	DADO	FINAL REVIEW OF FAQs FOR RECEIVERSHIP WEBSITE.	B110	0.30	99.00
10/30/24	AMDO	REVIEW AND RESPOND TO INVESTOR INQUIRIES; SEND W-9 TO STRETTO.	B110	0.30	99.00
10/30/24	ALAF	ATTEND TO INVESTOR INQUIRIES.	B110	2.50	575.00
10/30/24	DNR	WITNESS PREPARATION FOR IOWA EVIDENTIARY HEARING.	BT160	2.30	805.00
10/30/24	DNR	CORRESPONDENCE WITH STRETTO REGARDING DISTRIBUTION INQUIRY FOR CLASS 5 CREDITOR.	B130	0.30	105.00
10/30/24	DNR	CORRESPONDENCE WITH CLASS 5 CREDITOR REGARDING DISTRIBUTION PAYMENT.	B110	0.30	105.00
10/30/24	DADO	REVIEW AND ANALYZE DOCUMENTS TO RESPOND TO INVESTOR INQUIRIES.	B110	0.30	99.00
10/30/24	DADO	REVIEW DOCUMENTS PRIOR TO D.WILLIAMSON'S IOWA WITNESS PREP.	BT160	0.40	132.00



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DEBORAH WILLIAMSON

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DATE	ID	DESCRIPTION	TASK	HOURS	AMOUNT
10/30/24	DADO	PREP SESSION WITH COUNSEL FOR IOWA, R.ROMERO, D.BEHREND, AND D.WILLIAMSON.	BT160	2.30	759.00
10/30/24	DADO	CORRESPONDENCE WITH COUNSEL FOR IOWA REGARDING ADDITIONAL PRODUCTION.	BT160	0.10	33.00
10/30/24	DADO	EMAIL CORRESPONDENCE WITH STRETTO REGARDING FEE APPLICATION AND CORRESPONDING CHANGES.	B110	0.60	198.00
10/30/24	DADO	CALL WITH STRETTO REGARDING FEE APPLICATION CHANGES AND UPDATES AND REVISION OF THE SAME.	B110	0.30	99.00
10/30/24	DADO	REVIEW AND RESPOND TO INVESTOR INQUIRIES.	B110	0.60	198.00
10/30/24	DADO	REVIEW AND ANALYZE DOCUMENTS TO RESPOND TO INVESTOR INQUIRIES.	B310	0.30	99.00
10/30/24	DADO	EMAIL CORRESPONDENCE WITH A.DOMINGUEZ AND A.LAFUENTE REGARDING INVESTOR INQUIRIES AND RESPONSES TO INVESTORS REGARDING THE SAME.	B110	0.30	99.00
10/30/24	DADO	REVISION OF MOTION TO TERMINATE ENTITIES AND EMAIL CORRESPONDENCE WITH D.WILLIAMSON REGARDING SAME.	B110	0.60	198.00
10/30/24	DADO	COMPILED DOCUMENTS RELATED TO THE IOWA'S DOCUMENT PRODUCTION.	BT160	0.80	264.00
10/30/24	DADO	CONFERENCE WITH A.LAFUENTE REGARDING INVESTOR INQUIRY UPDATES AND UPDATES TO INTERNAL SPREADSHEETS.	B110	1.20	396.00
10/31/24	AMDO	REVIEW AND RESPOND TO INVESTOR INQUIRIES.	B110	0.20	66.00
10/31/24	DNR	CORRESPONDENCE WITH CLASS 5 CLAIMANT REGARDING DISTRIBUTION CHECK AND DETAILS ON SAME.	B110	0.50	175.00
10/31/24	DNR	RECEIVE AND REVIEW MATERIALS FROM STRETTO TO ANSWER CREDITOR DISTRIBUTION INQUIRY.	B130	0.20	70.00
10/31/24	DNR	CORRESPONDENCE WITH RECEIVER REGARDING DISTRIBUTION CHECK ISSUES FOR CLASS 5 CLAIMANT.	B130	0.30	105.00
10/31/24	DNR	CALL WITH DOMINIQUE DOUGLAS REGARDING ADDITIONAL DOCUMENTS REQUESTED FOR EVIDENTIARY HEARING.	BT160	0.20	70.00
10/31/24	DNR	REVIEW LATEST UPDATE FROM FARMEE.	B210	0.20	70.00
10/31/24	DNR	CORRESPONDENCE TO SEC COUNSEL REGARDING FARMOUT UPDATE.	B110	0.10	35.00
10/31/24	DNR	CORRESPONDENCE TO OIL AND GAS COUNSEL REGARDING FARMOUT UPDATE.	B210	0.10	35.00
10/31/24	DADO	REVISION OF MOTION TO TERMINATE ENTITIES.	B110	0.60	198.00



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DEBORAH WILLIAMSON

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DATE	ID	DESCRIPTION	TASK	HOURS	AMOUNT
10/31/24	DADO	REVIEW AND RESPOND TO INVESTOR INQUIRIES.	B110	1.00	330.00
10/31/24	DADO	REVIEW AND ANALYZE DOCUMENTS TO RESPOND TO INVESTOR INQUIRIES.	B110	0.70	231.00
10/31/24	DADO	COMPILED DOCUMENTS RELATED TO THE IOWA'S DOCUMENT PRODUCTION AND SENT TO IOWA.	BT160	0.70	231.00
10/31/24	ALAF	ATTEND TO INVESTOR INQUIRIES.	B110	1.00	230.00
TOTAL				206.90	\$64,980.70



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BILLING SUMMARY

ID	TIMEKEEPER	TITLE	HOURS	RATE	AMOUNT
MGC	MICHAEL G. CUMMING	MEMBER	2.10	648.00	1,360.80
JCGI	JEFFREY GIFFORD	MEMBER	1.90	576.00	1,094.40
DNR	DANIELLE R. BEHREND	PARTICIPATING MEMBER	27.50	350.00	9,625.00
AMDO	ALANNA M. DOMINGUEZ	ASSOCIATE	6.90	330.00	2,277.00
DADO	DOMINIQUE A. DOUGLAS	ASSOCIATE	116.30	330.00	38,379.00
TED	THERESA E. DICK	PARALEGAL	9.00	256.50	2,308.50
ALAF	ADRIANNA LAFUENTE	PARALEGAL	43.20	230.00	9,936.00
TOTAL			206.90		\$64,980.70



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DEBORAH WILLIAMSON

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DISBURSEMENTS

DATE	DESCRIPTION	QUANTITY	RATE	AMOUNT
	PHOTOCOPIES	242.00	0.10	24.20
	POSTAGE	6.00	7.99	47.94
	PRINTING EXPENSES	928.00	0.10	92.80
	RELATIVITY DATA HOSTING	1.00	3,320.00	3,320.00
	SCANNING	124.00	0.10	12.40
	TOTAL DISBURSEMENTS			3,499.14



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DEBORAH WILLIAMSON

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TASK SUMMARY

TASK	TASK DESCRIPTION	HOURS	AMOUNT
B110	CASE ADMINISTRATION	109.00	31,784.50
B120	ASSET ANALYSIS AND RECOVERY	0.50	175.00
B130	ASSET DISPOSITION	3.40	1,190.00
B210	BUSINESS OPERATIONS	8.70	3,470.40
B240	TAX ISSUES	8.40	3,465.80
B310	CLAIMS ADMINISTRATION & OBJECT	33.40	11,026.00
BT155	STATUS REPORTS	11.10	3,689.00
BT160	LITIGATION CONSULTING	32.40	10,180.00
TOTAL		206.90	64,980.70

EXPENSE SUMMARY

PHOTOCOPIES	24.20
SCANNING	12.40
PRINTING EXPENSES	92.80
POSTAGE	47.94
RELATIVITY DATA HOSTING	3,320.00
TOTAL	3,499.14



400 Renaissance Center • Detroit, MI 48243 • EIN# 38-1446628

DEBORAH D WILLIAMSON
DEBORAH WILLIAMSON
112 E. PECAN
STE. 1800
SAN ANTONIO, TX 78205

DUE UPON RECEIPT

JANUARY 31, 2025
MATTER #: 122686.000002
INVOICE #: 3639146

FOR PROFESSIONAL SERVICES RENDERED

RE: REPRESENTATION OF RECEIVERSHIP FOR THE HEARTLAND GROUP VENTURES LLC, ET AL

FEES	\$	27,453.00
DISBURSEMENTS		3,632.15
INVOICE TOTAL	\$	31,085.15



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RE: REPRESENTATION OF RECEIVERSHIP FOR THE HEARTLAND GROUP VENTURES LLC, ET AL

DATE	ID	DESCRIPTION	TASK	HOURS	AMOUNT
11/01/24	DNR	CORRESPONDENCE WITH OIL AND GAS COUNSEL REGARDING FARMOUT UPDATE.	B210	0.20	70.00
11/01/24	DNR	REVIEW AND RESPOND TO INVESTOR INQUIRIES.	B110	0.60	210.00
11/01/24	DNR	CORRESPONDENCE WITH FARMEE REGARDING GAS CONTRACT.	B210	0.30	105.00
11/01/24	DNR	CORRESPONDENCE WITH OIL AND GAS COUNSEL REGARDING RAILROAD TEXAS COMMISSION NOTICE OF HEARING AND ABANDONED PROPERTIES.	B210	0.30	105.00
11/01/24	DNR	CORRESPONDENCE TO AHUJA & CONSULTANTS AND RECEIVER REGARDING IRS NOTICE REGARDING BALANCE DUE.	B240	0.10	35.00
11/01/24	DNR	REVIEW AND PROCESS RECEIVER'S MAIL.	B210	0.50	175.00
11/01/24	DADO	REVISE AND FILE MOTION TO TERMINATE AND CORRESPONDENCE WITH MARAZIA REGARDING SUBMISSION OF PROPOSED ORDER.	B110	0.60	198.00
11/01/24	DADO	DRAFT AND FILE CERTIFICATE OF SERVICE AND NOTICE OF HEARING.	B110	0.70	231.00
11/01/24	DADO	EMAIL CORRESPONDENCE WITH RECEIVER'S RETAINED PROFESSIONALS REGARDING THE NOVEMBER 17TH HEARING.	B110	0.20	66.00
11/01/24	DADO	REVIEW AND RESPOND TO INVESTOR INQUIRIES.	B110	0.40	132.00
11/03/24	DADO	REVIEW AND RESPOND TO INVESTOR INQUIRIES.	B110	0.40	132.00
11/04/24	DNR	REVIEW AND PROCESS RECEIVER'S MAIL.	B210	0.30	105.00
11/04/24	DADO	REVIEW AND RESPOND TO INVESTOR INQUIRIES.	B110	0.60	198.00
11/04/24	DADO	REVIEW AND ANALYZE DOCUMENTS TO RESPOND TO INVESTOR INQUIRIES.	B110	0.30	99.00
11/04/24	DADO	EMAIL CORRESPONDENCE WITH D.WILLIAMSON AND STRETTO REGARDING INVESTOR CLAIM.	B310	0.20	66.00
11/04/24	DADO	DRAFT LETTER AND COMPILE DOCUMENTS TO SEND TO YOUNG COUNTY TAX OFFICE REGARDING CAD.	B240	0.30	99.00
11/04/24	DADO	COMPILE DOCUMENTS TO UPDATE RECEIVERSHIP WEBSITE AND SENDING OF THE SAME TO D.BEHRENS.	B110	0.10	33.00
11/04/24	DADO	CALL WITH COUNSEL FOR IOWA REGARDING SUBPOENA.	BT160	0.40	132.00



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DATE	ID	DESCRIPTION	TASK	HOURS	AMOUNT
11/04/24	DADO	COMPILING OF DOCUMENTS RELATED TO SUBPOENA AND SENDING OF SAME TO COUNSEL FOR IOWA.	BT160	0.30	99.00
11/04/24	ALAF	ATTEND TO INVESTOR INQUIRIES.	B110	0.60	138.00
11/05/24	ALAF	ATTEND TO INVESTOR INQUIRIES.	B110	1.20	276.00
11/05/24	DNR	UPDATE WEBSITE CONTENT.	B110	0.40	140.00
11/05/24	DNR	CORRESPONDENCE WITH FARMEE REGARDING ENTERPRISE AGREEMENT.	B210	0.20	70.00
11/05/24	DNR	REVIEW AND RECEIVE IBC BANK STATEMENT; SEND TO AHUJA & CONSULTANTS.	B210	0.30	105.00
11/05/24	DNR	RECEIVE AND REVIEW ACCOUNT STATEMENTS FROM WAB; SEND TO AHUJA & CONSULTANTS.	B210	0.50	175.00
11/05/24	DNR	REVIEW AND PROCESS RECEIVER'S MAIL.	B210	0.40	140.00
11/05/24	DNR	CORRESPONDENCE TO AHUJA & CONSULTANTS AND RECEIVER REGARDING IRS MAIL RECEIVED.	B240	0.10	35.00
11/05/24	DADO	REVIEW AND RESPOND TO INVESTOR INQUIRIES.	B110	0.40	132.00
11/06/24	DADO	CONFERENCE WITH D.WILLIAMSON AND DARRELL JONES REGARDING FARM OUT AGREEMENT.	BT160	0.50	165.00
11/06/24	DADO	REVIEW AND RESPOND TO INVESTOR INQUIRIES.	B110	1.00	330.00
11/06/24	DADO	REVIEW AND ANALYZE DOCUMENTS TO RESPOND TO INVESTOR INQUIRIES.	B110	1.00	330.00
11/06/24	ALAF	ATTEND TO INVEST INQUIRIES.	B110	0.80	184.00
11/07/24	DNR	CALL WITH DEBORAH D. WILLIAMSON AND DOMINIQUE DOUGLAS REGARDING INVESTOR INQUIRY AND JOINT ACCOUNT ITEMS.	B110	0.70	245.00
11/07/24	DNR	RESEARCH CERTAIN INVESTMENT INFORMATION AND PROVIDE ANALYSIS TO RECEIVER.	B120	0.40	140.00
11/07/24	DADO	REVIEW AND RESPOND TO INVESTOR INQUIRIES.	B110	1.40	462.00
11/07/24	DADO	REVIEW AND ANALYZE DOCUMENTS TO RESPOND TO INVESTOR INQUIRIES.	B110	1.00	330.00
11/07/24	DADO	CONFERENCE WITH COUNSEL FOR THE SEC AND D.WILLIAMSON REGARDING NOVEMBER 14TH HEARING.	B110	0.30	99.00
11/07/24	DADO	PHONE CALL WITH COMPTROLLER IN JACK COUNTY REGARDING LETTER SENT TO COUNTY REGARDING CADS.	B240	0.40	132.00
11/07/24	DADO	CONFERENCE WITH D.BEHREND'S AND D.WILLIAMSON REGARDING INVESTOR INQUIRIES.	B110	0.50	165.00



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DEBORAH WILLIAMSON

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DATE	ID	DESCRIPTION	TASK	HOURS	AMOUNT
11/08/24	DNR	ADDRESS INVESTOR INQUIRY REGARDING DISTRIBUTION PAYMENT AND ISSUES ON REMITTANCE OF SAME.	B110	0.50	175.00
11/08/24	DADO	CONFERENCE WITH D.BEHREND'S AND D.WILLIAMSON REGARDING INVESTOR INQUIRIES.	B110	0.30	99.00
11/08/24	DADO	EMAIL CORRESPONDENCE WITH D.WILLIAMSON AND STRETTO REGARDING INVESTOR CLAIM.	B310	0.40	132.00
11/08/24	DADO	REVIEW AND RESPOND TO INVESTOR INQUIRIES.	B110	0.60	198.00
11/08/24	DADO	REVIEW AND ANALYZE DOCUMENTS TO RESPOND TO INVESTOR INQUIRIES.	B110	0.30	99.00
11/08/24	DADO	RESEARCH RELATED TO BAHAMAS PROPERTIES.	BT160	1.50	495.00
11/11/24	ALAF	ATTEND TO INVESTOR INQUIRIES.	B110	0.30	69.00
11/11/24	DNR	REVIEW AND PROCESS RECEIVER'S MAIL.	B210	0.30	105.00
11/11/24	DADO	RESEARCH RELATED TO BAHAMAS PROPERTIES.	BT160	1.10	363.00
11/11/24	DADO	DRAFT COMPLAINT AGAINST CERTAIN PARTIES REGARDING PROPERTIES.	BT160	0.80	264.00
11/11/24	DADO	REVIEW AND RESPOND TO INVESTOR INQUIRIES.	B110	0.90	297.00
11/11/24	DADO	REVIEW AND ANALYZE DOCUMENTS TO RESPOND TO INVESTOR INQUIRIES.	B110	0.20	66.00
11/11/24	DADO	CONFERENCE WITH D.WILLIAMSON REGARDING BAHAMAS RESEARCH FINDINGS.	B120	0.30	99.00
11/12/24	DADO	BEGIN DRAFTING COMPLAINT AGAINST CERTAIN PARTIES REGARDING PROPERTIES.	B120	5.00	1,650.00
11/12/24	DADO	CONFERENCE WITH D.WILLIAMSON AND AHUJA & CONSULTANTS REGARDING IRS AND OTHER TAX RESPONSIBILITIES.	B240	0.50	165.00
11/12/24	DADO	RESEARCH PROCEDURES FOR TERMINATION OF CALIFORNIA ENTITY.	BT140	0.20	66.00
11/12/24	DADO	CORRESPONDENCE WITH A. LAFUENTE REGARDING INVESTOR INQUIRIES.	B110	0.10	33.00
11/13/24	ALAF	ATTEND TO INVESTOR INQUIRIES.	B110	0.50	115.00
11/13/24	DNR	REVIEW AND PROCESS RECEIVER'S MAIL.	B210	0.50	175.00
11/13/24	DNR	CORRESPONDENCE WITH IOWA ENFORCEMENT COUNSEL REGARDING WITNESS PREPARATION.	BT160	0.20	70.00
11/13/24	DNR	CORRESPONDENCE WITH STRETTO REGARDING STALE CHECKS.	B130	0.20	70.00
11/13/24	DADO	RESEARCH AND CONFERENCE WITH D.WILLIAMSON	BT160	0.50	165.00



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DEBORAH WILLIAMSON

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DATE	ID	DESCRIPTION	TASK	HOURS	AMOUNT
		REGARDING COMPLAINT FILING PROCEDURE.			
11/13/24	DADO	DRAFT COMPLAINT AGAINST CERTAIN PARTIES REGARDING PROPERTIES.	BT160	4.90	1,617.00
11/13/24	DADO	DRAFT GRID OF PROCEDURES REQUIRED TO TERMINATE EACH ENTITY.	B110	1.00	330.00
11/13/24	DADO	REVIEW AND RESPOND TO INVESTOR INQUIRIES.	B110	0.40	132.00
11/13/24	DADO	REVIEW AND ANALYZE DOCUMENTS TO RESPOND TO INVESTOR INQUIRIES.	B110	0.20	66.00
11/13/24	DADO	CORRESPONDENCE WITH STRETTO REGARDING RE-ISSUANCE OF CERTAIN CHECKS.	B110	0.20	66.00
11/14/24	DNR	CALL WITH DOMINIQUE DOUGLAS REGARDING VARIOUS CASE MATTERS, INCLUDING DISTRIBUTION AND BAHAMAS PLEADING.	B110	0.50	175.00
11/14/24	DADO	PREPARE FOR NOVEMBER 14TH HEARINGS.	B110	1.30	429.00
11/14/24	DADO	REVIEW EMAIL CORRESPONDENCE WITH AHUJA & CONSULTANTS AND LETTERS TO IRS; CONFERENCE WITH D.WILLIAMSON REGARDING THE SAME.	B240	1.40	462.00
11/14/24	DADO	DRAFT COMPLAINT AGAINST CERTAIN PARTIES REGARDING PROPERTIES.	B120	2.30	759.00
11/14/24	DADO	CONFERENCE WITH AHUJA & CONSULTANTS AND D.WILLIAMSON REGARDING STATUS OF TAXES.	B240	0.70	231.00
11/14/24	DADO	HEARING ON APPROVAL OF 3Q2024 FEE APPLICATION AND MOTION TO APPROVE PROCEDURES.	B110	0.60	198.00
11/14/24	DADO	REVIEW AND RESPOND TO INVESTOR INQUIRIES.	B110	0.60	198.00
11/14/24	DADO	REVIEW AND ANALYZE DOCUMENTS TO RESPOND TO INVESTOR INQUIRIES.	B110	0.40	132.00
11/14/24	DADO	DRAFT CHECKLIST FOR TERMINATION OF ENTITIES.	B110	0.40	132.00
11/14/24	ALAF	ATTEND TO INVESTOR INQUIRIES.	B110	0.50	115.00
11/15/24	DNR	ADDRESS ISSUES REGARDING INVESTOR COUNSEL CORRESPONDENCE.	B110	0.20	70.00
11/15/24	DNR	CORRESPONDENCE WITH WAB REGARDING FUND TRANSFER AND ACCOUNT ISSUES.	B210	0.60	210.00
11/15/24	DNR	CORRESPONDENCE WITH VENDOR CONTACT REGARDING RAILROAD COMMISSION HEARING.	B110	0.20	70.00
11/15/24	DNR	CALL WITH WAB CONTACT REGARDING BANK ACCOUNT ISSUES.	B210	0.20	70.00



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DEBORAH WILLIAMSON

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DATE	ID	DESCRIPTION	TASK	HOURS	AMOUNT
11/15/24	DNR	ANALYZE INVESTMENT RECORDS AND PROVIDE INFORMATION TO RECEIVER AND SEC COUNSEL ON SAME IN RESPONSE TO INVESTOR COUNSEL LETTER.	B110	0.50	175.00
11/15/24	DNR	REVIEW INVESTOR COUNSEL CORRESPONDENCES TO SEC AND RECEIVER.	B110	0.20	70.00
11/15/24	DNR	PREPARE AND SUBMIT FORMS TO WAB REGARDING TRANSFER.	B210	0.30	105.00
11/15/24	DADO	EMAIL CORRESPONDENCE WITH D.WILLIAMSON, D. BEHREND, AND OUTSIDE COUNSEL TO INVESTOR REGARDING SETTLEMENT.	B110	0.30	99.00
11/15/24	DADO	REVIEW AND RESPOND TO INVESTOR INQUIRIES.	B110	0.70	231.00
11/15/24	DADO	EMAIL CORRESPONDENCE WITH D.WILLIAMSON REGARDING AHUJA & CONSULTANTS.	B240	1.10	363.00
11/15/24	DADO	CONFERENCE WITH D.BEHREND REGARDING INVESTOR INQUIRIES, STATUS UPDATES, AND CASE MANAGEMENT.	B110	0.70	231.00
11/15/24	DADO	DRAFT AND FILE CERTIFICATE OF SERVICE AND NOTICE OF HEARING FOR STATUS CONFERENCE ON DECEMBER 5TH.	B110	0.60	198.00
11/15/24	DADO	DRAFT COMPLAINT AGAINST CERTAIN PARTIES REGARDING PROPERTIES.	B120	3.60	1,188.00
11/15/24	DADO	PHONE CALL WITH THE TEXAS COMPTROLLER'S OFFICE REGARDING PANTHER CITY ENERGY REGARDING TAXES.	B240	0.20	66.00
11/15/24	DADO	REVIEW REPORT AND RECOMMENDATION ON TERMINATION MOTION.	B110	0.30	99.00
11/18/24	DNR	CORRESPONDENCE WITH IOWA ENFORCEMENT COUNSEL REGARDING EVIDENTIARY HEARING.	B110	0.30	105.00
11/18/24	DADO	CORRESPONDENCE WITH AHUJA & CONSULTANTS REGARDING BAHAMAS TRACING.	B120	0.20	66.00
11/18/24	DADO	CORRESPONDENCE WITH STRETTO REGARDING CHECK RE-ISSUANCE.	B110	0.20	66.00
11/18/24	DADO	DRAFT COMPLAINT AGAINST CERTAIN PARTIES REGARDING PROPERTIES.	BT160	7.50	2,475.00
11/18/24	DADO	PHONE CALL WITH AHUJA & CONSULTANTS REGARDING BAHAMAS DECLARATION AND EMAIL CORRESPONDENCE REGARDING THE SAME.	B120	0.30	99.00
11/19/24	DNR	RECEIVE AND PROCESS RECEIVER'S MAIL.	B210	0.30	105.00
11/19/24	DNR	RECEIVE AND PROCESS RECEIVER'S MAIL.	B210	0.40	140.00



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DEBORAH WILLIAMSON

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DATE	ID	DESCRIPTION	TASK	HOURS	AMOUNT
11/19/24	DADO	CONFERENCE WITH COUNSEL FOR THE SEC REGARDING CASE STATUS.	B110	0.50	165.00
11/19/24	DADO	REVIEW DOCUMENTS FOR DRAFTING OF COMPLAINT AND CONFERENCE WITH D.WILLIAMSON.	BT160	2.50	825.00
11/19/24	DADO	DRAFT COMPLAINT AGAINST CERTAIN PARTIES REGARDING PROPERTIES.	BT160	1.00	330.00
11/19/24	DADO	REVIEW TRACING DOCUMENTS RELATED TO THE BAHAMAS PROPERTIES.	B120	1.60	528.00
11/21/24	DADO	REVIEW CORRESPONDENCE WITH AHUJA & CONSULTANTS AND ATTACHED DOCUMENTS FOR INTERNAL REVENUE SERVICE.	B240	0.50	165.00
11/21/24	DADO	REVISE LETTER TO IRS FOR 2019 Q3/Q4 PAYROLL TAXES.	B240	0.50	165.00
11/22/24	DADO	REVIEW AND RESPOND TO INVESTOR INQUIRIES.	B110	0.30	99.00
11/22/24	ALAF	ATTEND TO INVESTOR INQUIRIES.	B110	0.30	69.00
11/25/24	ALAF	ATTEND TO INVESTOR INQUIRIES.	B110	0.50	115.00
11/25/24	DNR	REVIEW AND PROCESS RECEIVER'S MAIL.	B210	0.30	105.00
11/25/24	DADO	REVIEW AND RESPOND TO INVESTOR INQUIRIES.	B110	0.60	198.00
11/25/24	DADO	CORRESPONDENCE WITH D.WILLIAMSON REGARDING LETTER TO THE IRS AND REVISION OF THE SAME.	B240	0.50	165.00
11/25/24	DADO	DRAFT COMPLAINT AGAINST CERTAIN PARTIES REGARDING PROPERTIES.	BT160	0.50	165.00
11/25/24	DADO	EMAIL CORRESPONDENCE WITH AHUJA & CONSULTANTS REGARDING BAHAMAS.	B240	1.00	330.00
11/25/24	DADO	EMAIL CORRESPONDENCE WITH AHUJA & CONSULTANTS REGARDING BI-WEEKLY MEETING.	B240	0.20	66.00
11/25/24	DADO	REVIEW INVESTOR CORRESPONDENCE.	B110	0.40	132.00
11/25/24	DADO	REVISE GRID FOR BAHAMAS PLEADING.	BT160	2.00	660.00
11/26/24	DADO	REVIEW AND RESPOND TO INVESTOR INQUIRIES.	B110	0.40	132.00
11/26/24	DADO	EMAIL CORRESPONDENCE WITH A.LAFUENTE REGARDING INVESTOR INQUIRIES.	B110	0.20	66.00
11/26/24	DADO	REVIEW INVESTOR DOCUMENTATION TO RESPOND TO INVESTOR INQUIRIES.	B110	0.60	198.00
11/27/24	DADO	REVIEW AND RESPOND TO INVESTOR INQUIRIES.	B110	0.60	198.00
11/27/24	ALAF	ATTEND TO INVESTOR INQUIRIES.	B110	0.50	115.00



DEBORAH D WILLIAMSON
DEBORAH WILLIAMSON

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DATE	ID	DESCRIPTION	TASK	HOURS	AMOUNT
11/29/24	DADO	REVIEW AND RESPOND TO INVESTOR INQUIRIES.	B110	0.20	66.00
TOTAL				84.10	\$27,453.00



DEBORAH D WILLIAMSON
DEBORAH WILLIAMSON

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BILLING SUMMARY

ID	TIMEKEEPER	TITLE	HOURS	RATE	AMOUNT
DNR	DANIELLE R. BEHREND	PARTICIPATING MEMBER	11.00	350.00	3,850.00
DADO	DOMINIQUE A. DOUGLAS	ASSOCIATE	67.90	330.00	22,407.00
ALAF	ADRIANNA LAFUENTE	PARALEGAL	5.20	230.00	1,196.00
TOTAL			84.10		\$27,453.00



DEBORAH D WILLIAMSON
DEBORAH WILLIAMSON

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JANUARY 31, 2025

DISBURSEMENTS

DATE	DESCRIPTION	QUANTITY	RATE	AMOUNT
11/13/24	VENDOR: TEXAS SECRETARY OF STATE; INVOICE#: 545703084; DATE: 11/30/2024 - WEB INQUIRIES	1.00	2.00	2.00
	DOCKET RESEARCH-COURTLINK	6.00	14.25	85.50
	LEGAL RESEARCH-LEXIS	5.00	25.80	129.00
	POSTAGE	4.00	4.31	17.25
	PRINTING EXPENSES	612.00	0.10	61.20
	RELATIVITY DATA HOSTING	1.00	3,320.00	3,320.00
	SCANNING	172.00	0.10	17.20
	TOTAL DISBURSEMENTS			3,632.15



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TASK SUMMARY

TASK	TASK DESCRIPTION	HOURS	AMOUNT
B110	CASE ADMINISTRATION	32.30	10,221.00
B120	ASSET ANALYSIS AND RECOVERY	13.70	4,529.00
B130	ASSET DISPOSITION	0.20	70.00
B210	BUSINESS OPERATIONS	5.90	2,065.00
B240	TAX ISSUES	7.50	2,479.00
B310	CLAIMS ADMINISTRATION & OBJECT	0.60	198.00
BT140	CORPORATE FINANCE	0.20	66.00
BT160	LITIGATION CONSULTING	23.70	7,825.00
TOTAL		84.10	27,453.00

EXPENSE SUMMARY

MISCELLANEOUS EXPENSE	2.00
SCANNING	17.20
PRINTING EXPENSES	61.20
POSTAGE	17.25
LEGAL RESEARCH-LEXIS	129.00
RELATIVITY DATA HOSTING	3,320.00
DOCKET RESEARCH-COURTLINK	85.50
TOTAL	3,632.15



400 Renaissance Center • Detroit, MI 48243 • EIN# 38-1446628

DEBORAH D WILLIAMSON
DEBORAH WILLIAMSON
112 E. PECAN
STE. 1800
SAN ANTONIO, TX 78205

DUE UPON RECEIPT

JANUARY 31, 2025
MATTER #: 122686.000002
INVOICE #: 3639147

FOR PROFESSIONAL SERVICES RENDERED

RE: REPRESENTATION OF RECEIVERSHIP FOR THE HEARTLAND GROUP VENTURES LLC, ET AL

FEES	\$	42,744.60
DISBURSEMENTS		1,144.16
INVOICE TOTAL	\$	43,888.76



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RE: REPRESENTATION OF RECEIVERSHIP FOR THE HEARTLAND GROUP VENTURES LLC, ET AL

DATE	ID	DESCRIPTION	TASK	HOURS	AMOUNT
12/02/24	AMDO	REVIEW AND RESPOND TO INVESTOR INQUIRIES.	B110	0.10	33.00
12/02/24	DNR	RECEIVE AND PROCESS RECEIVER'S MAIL.	B210	0.30	105.00
12/02/24	DNR	REVIEW COURT ORDER REGARDING TERMINATION OF BUSINESSES.	B210	0.10	35.00
12/02/24	DNR	UPDATE WEBSITE.	B110	0.40	140.00
12/02/24	DADO	CORRESPONDENCE WITH D.BEHREND'S REGARDING STATUS CONFERENCE.	B110	0.20	66.00
12/02/24	DADO	EMAIL CORRESPONDENCE WITH AHUJA & CONSULTANTS REGARDING IRS FORM 5495.	BT160	0.30	99.00
12/02/24	DADO	REVIEW AND RESPOND TO INVESTOR INQUIRIES.	B110	0.90	297.00
12/02/24	DADO	DRAFT EMAIL CORRESPONDENCE FOR AHUJA & CONSULTANTS REGARDING ORDER GRANTING MOTION TO APPROVE PROCEDURES TO TERMINATE.	B110	0.40	132.00
12/02/24	DADO	EMAIL CORRESPONDENCE WITH STRETTO REGARDING CHECK RE-ISSUANCE.	B110	0.20	66.00
12/02/24	DADO	RESEARCH PROCEDURES FOR TERMINATION OF CALIFORNIA ENTITY.	B110	0.60	198.00
12/02/24	DADO	CONFERENCE WITH D.BEHREND'S REGARDING INVESTOR INQUIRY AND EMAIL REGARDING THE SAME.	B110	0.30	99.00
12/02/24	DADO	REVIEW RECENT COURT ORDER AND SENDING OF SAME TO APPROPRIATE PARTIES.	BT160	0.30	99.00
12/02/24	DADO	REVIEW DOCUMENTS TO ADDRESS INVESTOR INQUIRIES.	B110	0.20	66.00
12/02/24	DADO	REVISE COVER LETTERS FOR FORM 5495 FOR THE IRS.	B110	0.40	132.00
12/03/24	DADO	REVIEW AND RESPOND TO INVESTOR INQUIRIES.	B110	1.20	396.00
12/03/24	DADO	REVIEW NEW DOCKET ENTRIES ON LEXIS.	B110	0.10	33.00
12/03/24	DADO	PHONE CONFERENCE WITH AHUJA & CONSULTANTS REGARDING PAYROLL TAXES INDEMNITY.	B240	0.70	231.00
12/03/24	DADO	REVIEW TAX RETURNS AND CORRESPONDENCE WITH D.WILLIAMSON REGARDING THE SAME.	B110	0.70	231.00
12/03/24	DNR	RECEIVE AND REVIEW IBC BANK NOVEMBER 2024 STATEMENT AND ACCOUNT DOCUMENTS; SEND TO AHUJA & CLARK.	B210	0.40	140.00



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DATE	ID	DESCRIPTION	TASK	HOURS	AMOUNT
12/03/24	DNR	REVIEW AND RECEIVE WAB ACCOUNT DOCUMENTS AND STATEMENTS FOR NOVEMBER 2024; SEND TO AHUJA & CLARK.	B210	0.50	175.00
12/03/24	DNR	CORRESPONDENCE WITH YAIR BARAHONA REGARDING DATA HOSTING AND PAYMENT FOR DECEMBER 2024.	B110	0.20	70.00
12/03/24	DNR	CALLS WITH DOMINIQUE DOUGLAS REGARDING JADE INVESTMENT AND BAHAMAS TRACING.	B120	0.40	140.00
12/03/24	DADO	REVISE COVER LETTERS FOR DOCUMENTS BEING SENT TO THE IRS.	B110	0.40	132.00
12/03/24	DADO	FINAL REVIEW OF PACKAGE FOR THE IRS.	B240	0.30	99.00
12/03/24	DADO	CONFERENCE WITH D.BEHREND'S REGARDING BANK STATEMENTS.	B110	0.20	66.00
12/03/24	DADO	CONFERENCE WITH D.WILLIAMSON REGARDING CONVERSATION WITH AHUJA & CONSULTANTS AND PAYROLL TAX INDEMNITY.	B240	0.30	99.00
12/03/24	DADO	REVIEW DOCUMENTS TO ADDRESS INVESTOR INQUIRIES.	B110	0.30	99.00
12/03/24	DADO	REVIEW EMAIL CORRESPONDENCE WITH STRETTO REGARDING RE-ISSUANCE OF CHECKS.	B110	0.10	33.00
12/03/24	DADO	CONFERENCE WITH AHUJA & CONSULTANTS AND D.WILLIAMSON REGARDING CRITICAL ITEMS.	B240	1.00	330.00
12/03/24	DADO	REVIEW BANK RECORDS FOR BARRON PETROLEUM.	B110	0.20	66.00
12/03/24	DADO	REVIEW DOCUMENTS REGARDING JADE MINE IN GUATEMALA.	B110	0.30	99.00
12/03/24	ALAF	ATTEND TO INVESTOR INQUIRIES.	B110	0.50	115.00
12/04/24	DADO	REVIEW DOCUMENTS TO ADDRESS INVESTOR INQUIRIES.	B110	0.30	99.00
12/04/24	DADO	REVIEW AND RESPOND TO INVESTOR INQUIRIES.	B110	0.70	231.00
12/04/24	DADO	REVIEW BAHAMAS DEEDS.	B110	0.20	66.00
12/04/24	DADO	REVIEW CLASS 5 CLAIMS FOR AMOUNTS OWED TO CERTAIN RECEIVERSHIP ENTITIES.	B110	2.20	726.00
12/04/24	DADO	PREPARE FOR THURSDAY'S 11 AM STATUS CONFERENCE.	B110	0.50	165.00
12/04/24	DADO	REVISE GRID FOR BAHAMAS COMPLAINT.	BT160	1.30	429.00
12/04/24	DADO	CORRESPONDENCE WITH STRETTO REGARDING CLASS 5 CLAIMS.	B110	0.10	33.00
12/04/24	DADO	CORRESPONDENCE WITH D.WILLIAMSON REGARDING CLASS 5 CLAIMS.	B110	0.10	33.00
12/04/24	DADO	DRAFT MEMO TO AHUJA & CONSULTANTS AND D.WILLIAMSON REGARDING CLASS 5 FINDINGS.	B310	1.90	627.00



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DATE	ID	DESCRIPTION	TASK	HOURS	AMOUNT
12/04/24	DNR	ADDRESS OPEN CLAIM ISSUES WITH DOMINIQUE DOUGLAS.	B310	0.20	70.00
12/04/24	DNR	CALL WITH DOMINIQUE DOUGLAS REGARDING BAHAMAS DEMANDS.	B120	0.20	70.00
12/05/24	DNR	CALL WITH DOMINIQUE DOUGLAS REGARDING ENTITY DISSOLUTION.	B110	0.20	70.00
12/05/24	DNR	CALL WITH RECEIVER AND DOMINIQUE DOUGLAS REGARDING TERMINATION OF RECEIVERSHIP ENTITIES AND RELATED ISSUES IN WYOMING, TEXAS, AND DELAWARE.	B110	1.00	350.00
12/05/24	DNR	ADDRESS FRANCHISE TAX AND FILING REPORT ISSUES IN TEXAS.	B240	0.40	140.00
12/05/24	DADO	COMPLETE DOCUMENTS FOR TERMINATION OF VARIOUS TEXAS ENTITIES.	B110	2.20	726.00
12/05/24	DADO	ATTEND STATUS CONFERENCE.	B110	0.50	165.00
12/05/24	DADO	PREPARE FOR STATUS CONFERENCE.	B110	0.40	132.00
12/05/24	DADO	CONFERENCE WITH DWILLIAMSON AND DBEHRENDIS REGARDING PROPERTY TRACING.	B120	1.00	330.00
12/05/24	DADO	CALLED WYOMING SECRETARY OF STATE REGARDING TERMINATION.	B110	0.20	66.00
12/05/24	DADO	EMAIL CORRESPONDENCE WITH AHUJA & CONSULTANTS REGARDING ENTITY TERMINATION.	B110	0.30	99.00
12/05/24	DADO	CONFERENCE WITH D.WILLIAMSON REGARDING ENTITY TERMINATION.	B110	0.20	66.00
12/05/24	DADO	DRAFT LETTER TO WYOMING SECRETARY OF STATE AND COMPILE DOCUMENTS.	B110	0.80	264.00
12/05/24	DADO	CALL WITH VARIOUS REGISTERED AGENTS IN WYOMING TO LOCATE INCORPORATOR.	B110	0.40	132.00
12/05/24	DADO	REVISE TERMINATION CHECKLIST	B110	0.20	66.00
12/05/24	DADO	CORRESPONDENCE WITH DBEHRENDIS AND A&C REGARDING MAILED DOCUMENTS.	B240	0.20	66.00
12/05/24	DADO	DRAFT CERTIFICATE OF SERVICE FOR JANUARY STATUS CONFERENCE.	B110	0.30	99.00
12/05/24	DADO	REVIEW AND RESPOND TO INVESTOR INQUIRIES.	B110	0.50	165.00
12/06/24	DADO	FILE AND COORDINATE SERVICE OF CERTIFICATE OF SERVICE.	B110	0.20	66.00
12/06/24	DADO	EMAIL CORRESPONDENCE WITH G.GONZALEZ REGARDING WYOMING TERMINATION MAILING.	B110	0.10	33.00



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DATE	ID	DESCRIPTION	TASK	HOURS	AMOUNT
12/06/24	DADO	DRAFT AND FILE NOTICE OF TERMINATION FOR VARIOUS RECEIVERSHIP PARTIES.	B110	1.10	363.00
12/06/24	DADO	REVIEW AND RESPOND TO INVESTOR INQUIRIES.	B110	0.60	198.00
12/06/24	DADO	RESEARCH RECEIVERSHIP CASES IN THE NDTX.	B110	3.70	1,221.00
12/06/24	DADO	EMAIL CORRESPONDENCE WITH STRETTO, D.BEHREND AND D.WILLIAMSON REGARDING INVESTOR CHECK STATUS.	B110	0.40	132.00
12/06/24	DADO	REVIEW DOCUMENTS TO ADDRESS INVESTOR INQUIRIES.	B110	0.40	132.00
12/06/24	DNR	CALL WITH DOMINIQUE DOUGLAS REGARDING INVESTOR CHECK INQUIRY AND WAB BANK DEPOSIT ISSUES.	B110	0.40	140.00
12/06/24	DNR	RESEARCH WAB BANK DEPOSIT AND COMMUNICATE WITH RECEIVER ON SAME.	B210	0.50	175.00
12/06/24	DNR	CORRESPONDENCE WITH STRETTO AND RECEIVER REGARDING WAB BANK DEPOSIT ISSUES FOR INVESTOR DISTRIBUTION.	B210	0.30	105.00
12/06/24	DNR	REVISE NOTICE OF PROPOSED ENTITY TERMINATION.	B210	0.30	105.00
12/09/24	DNR	CORRESPONDENCE WITH STRETTO AND RECEIVER REGARDING DISTRIBUTION CHECKS OUTSTANDING AND STALE DATE PER COURT ORDER.	B130	0.40	140.00
12/09/24	DNR	CORRESPONDENCE WITH SCE COUNSEL REGARDING ORDER ENTERED AGAINST FINANCIAL ADVISORS; REVIEW ORDERS.	B110	0.50	175.00
12/09/24	DADO	REVIEW NOTICE OF PROPOSED TERMINATION.	B110	0.20	66.00
12/09/24	DADO	REVIEW AND RESPOND TO INVESTOR INQUIRIES.	B110	0.40	132.00
12/09/24	DADO	PHONE CALL WITH AHUJA & CONSULTANTS REGARDING TAX RETURNS AND REVIEW OF SAME RETURNS.	B240	0.30	99.00
12/09/24	DADO	REVISE GRID FOR BAHAMAS COMPLAINT.	BT160	0.30	99.00
12/09/24	DADO	ANALYZE DOCUMENTS TO RESPOND TO INVESTOR INQUIRIES.	B110	0.20	66.00
12/09/24	DADO	CORRESPONDENCE WITH STRETTO REGARDING CHECK INQUIRY.	B110	0.20	66.00
12/09/24	DADO	EMAIL CORRESPONDENCE WITH D.WILLIAMSON REGARDING INSOLVENCY MEMO.	B110	0.10	33.00
12/09/24	DADO	EMAIL CORRESPONDENCE WITH AHUJA & CONSULTANTS REGARDING 2021 TAX RETURNS.	B240	0.20	66.00
12/10/24	ALAF	ATTEND TO INVESTOR INQUIRIES.	B110	2.80	644.00
12/10/24	DADO	REVIEW DOCUMENTS TO RESPOND TO INVESTOR INQUIRIES.	B110	0.80	264.00
12/10/24	DADO	DRAFT INSOLVENCY MEMO.	BT160	1.80	594.00



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DEBORAH WILLIAMSON

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DATE	ID	DESCRIPTION	TASK	HOURS	AMOUNT
12/10/24	DADO	PHONE CALL WITH AHUJA & CONSULTANTS REGARDING TAX FORMS.	B240	0.10	33.00
12/10/24	DADO	PHONE CONFERENCE WITH A.LAFUENTE REGARDING CHECK STALE DATE AND FOLLOW UP EMAIL CORRESPONDENCE REGARDING SAME.	B110	0.20	66.00
12/10/24	DADO	REVIEW AND RESPOND TO INVESTOR INQUIRIES.	B110	1.00	330.00
12/10/24	DADO	CONFERENCE WITH D.WILLIAMSON AND AHUJA & CONSULTANTS REGARDING TAX MATTERS AND EMAIL REGARDING DOCUMENTS REQUESTED.	B240	1.00	330.00
12/10/24	DADO	DRAFT EMAIL TO VICKI PALMOUR AND D.WILLIAMSON REGARDING NATURAL GAS ACCOUNTS.	B210	0.20	66.00
12/10/24	DADO	DRAFT AND FILE NOTICES OF TERMINATION FOR ENTITIES.	B110	2.50	825.00
12/10/24	DADO	CALL WITH A.LAFUENTE REGARDING INVESTOR CORRESPONDENCE.	B110	0.10	33.00
12/10/24	DADO	CORRESPONDENCE WITH AHUJA & CONSULTANTS REGARDING IRS FORMS.	B240	0.30	99.00
12/10/24	DADO	REVISE TERMINATION GRID.	B110	0.10	33.00
12/10/24	DADO	REVIEW THE MOST RECENT ASSET SPREADSHEET SENT BY AHUJA & CONSULTANTS.	B110	0.20	66.00
12/10/24	DADO	EMAIL CORRESPONDENCE WITH AHUJA & CONSULTANTS REGARDING TERMINATED ENTITIES.	B240	0.10	33.00
12/11/24	ALAF	ATTEND TO INVESTOR INQUIRIES.	B110	1.50	345.00
12/11/24	DNR	UPDATE INVESTOR CONTENT ON WEBSITE.	B110	0.50	175.00
12/11/24	DADO	CORRESPONDENCE WITH A.LAFUENTE REGARDING CHECK STATUS.	B110	0.80	264.00
12/11/24	DADO	EMAIL CORRESPONDENCE WITH AHUJA & CONSULTANTS REGARDING IRS FORM MAILING.	B110	0.10	33.00
12/11/24	DADO	EMAIL CORRESPONDENCE WITH AHUJA & CONSULTANTS REGARDING BAHAMAS TRACING.	B120	0.90	297.00
12/11/24	DADO	EMAIL CORRESPONDENCE WITH STRETTO REGARDING CHECK STATUS.	B110	0.20	66.00
12/11/24	DADO	DRAFT CERTIFICATE OF NO OBJECTION FOR TERMINATION OF ENTITIES.	B110	0.90	297.00
12/11/24	DADO	SERVE ADDITIONAL NOTICE OF PROPOSED TERMINATION FOR DODSON PRAIRIE.	B110	0.30	99.00
12/11/24	DADO	REVIEW AND RESPOND TO INVESTOR INQUIRIES.	B110	1.00	330.00



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DEBORAH WILLIAMSON

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DATE	ID	DESCRIPTION	TASK	HOURS	AMOUNT
12/11/24	DADO	REVIEW TEXAS FRANCHISE FORMS SENT BY AHUJA & CONSULTANTS.	B110	0.20	66.00
12/11/24	DADO	REVIEW EDITS TO CERTIFICATE OF NO OBJECTION.	B110	0.40	132.00
12/11/24	DADO	DRAFT AND FILE AMENDED CERTIFICATE OF SERVICE FOR DODSON.	B110	0.40	132.00
12/12/24	DADO	RESEARCH FRAUDULENT TRANSFER COMPLAINTS.	B110	0.20	66.00
12/12/24	DADO	REVIEW BANK OPENING DOCUMENTS.	B110	1.00	330.00
12/12/24	DADO	RESEARCH JURISDICTION ISSUES FOR COMPLAINT.	B110	0.30	99.00
12/12/24	DADO	CORRESPONDENCE WITH STRETTO REGARDING CHECK STATUS.	B110	0.40	132.00
12/12/24	DADO	DRAFT AND MAIL APPLICATION TO THE TEXAS DEPARTMENT OF PUBLIC RECORDS.	B110	1.30	429.00
12/12/24	DADO	CALL WITH SUN COAST CREDIT UNION REGARDING DISTRIBUTION.	B110	0.20	66.00
12/12/24	DADO	DRAFT AND FILE NOTICE OF PROPOSED TERMINATION FOR PANTHER CITY.	B110	0.60	198.00
12/12/24	DADO	PHONE CONFERENCE WITH A.LAFUENTE REGARDING CHECK STATUS.	B110	0.10	33.00
12/12/24	DADO	REVIEW CHECK STATUS FOR OCTOBER 17TH CHECKS.	B110	0.10	33.00
12/12/24	DADO	REVIEW AND RESPOND TO INVESTOR INQUIRIES.	B110	1.00	330.00
12/12/24	DADO	REVISE FRAUDULENT TRANSFER MEMO.	B110	2.20	726.00
12/12/24	DADO	CONFERENCE WITH STRETTO AND D.WILLIAMSON REGARDING CHECK STATUS, FOLLOW UP EMAIL REGARDING THE SAME.	B110	0.60	198.00
12/12/24	ALAF	ATTEND TO INVESTOR INQUIRIES.	B110	5.50	1,265.00
12/13/24	ALAF	ATTEND TO INVESTOR INQUIRIES.	B110	6.00	1,380.00
12/13/24	DADO	EMAIL CORRESPONDENCE REGARDING PROPOSED ENTITY TERMINATION.	B240	0.10	33.00
12/13/24	DADO	DRAFT CERTIFICATE OF NO OBJECTION FOR TERMINATION OF ENTITIES.	B110	0.30	99.00
12/13/24	DADO	REVISE FRAUDULENT TRANSFER MEMO.	B110	4.40	1,452.00
12/13/24	DADO	CORRESPONDENCE WITH A.LAFUENTE REGARDING INVESTOR CHECK STATUS.	B110	0.30	99.00
12/13/24	DADO	EMAIL CORRESPONDENCE WITH VICKI PALMOUR REGARDING GAS ACCOUNT STATUS.	B210	0.30	99.00



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DEBORAH WILLIAMSON

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DATE	ID	DESCRIPTION	TASK	HOURS	AMOUNT
12/13/24	DADO	REVIEW NEWEST SPREADSHEET SENT BY STRETTO REGARDING CHECK STATUS.	B110	0.40	132.00
12/13/24	DADO	REVISE A.LAFUENTE'S SPREADSHEET REGARDING CHECK CASHING STATUS.	B110	0.60	198.00
12/13/24	DADO	REVIEW AND RESPOND TO INVESTOR INQUIRIES.	B110	0.20	66.00
12/13/24	DADO	EMAIL CORRESPONDENCE WITH AHUJA & CONSULTANTS REGARDING BAHAMAS TRACING.	B120	0.20	66.00
12/13/24	DNR	UPDATE INVESTOR CONTENT ON WEBSITE.	B110	0.30	105.00
12/13/24	DNR	RECEIVE AND REVIEW ACCOUNT STATEMENT FROM IBC; SEND TO AHUJA & CONSULTANTS.	B210	0.30	105.00
12/16/24	DNR	CORRESPONDENCE WITH RECEIVER AND SEC COUNSEL REGARDING ASSET SPREADSHEET AND INQUIRY ON CASH ASSETS.	B110	0.60	210.00
12/16/24	DNR	REVIEW BANK RECORDS AND ANALYZE DEPOSITS TO RESPOND TO SEC CORRESPONDENCE.	B210	0.40	140.00
12/16/24	DNR	CORRESPONDENCE WITH VICKI PALMOUR CONSULTANTS REGARDING COMPTROLLER AND ACCOUNT CLOSURE ISSUES.	B210	0.50	175.00
12/16/24	DNR	TELEPHONE CONFERENCE WITH DOMINIQUE DOUGLAS REGARDING SEC INQUIRY AND ACCOUNT ASSET ANALYSIS.	B120	0.60	210.00
12/16/24	DNR	CORRESPONDENCE TO AHUJA & CONSULTANTS AND SEC COUNSEL REGARDING HEARTLAND PORTAL.	B110	0.20	70.00
12/16/24	DNR	RECEIVE AND PROCESS RECEIVER'S MAIL.	B210	0.40	140.00
12/16/24	DNR	CORRESPONDENCE WITH AHUJA & CONSULTANTS AND TEAM REGARDING CLOSURE OF ENTITIES PAPERWORK IN VARIOUS JURISDICTIONS.	B210	0.60	210.00
12/16/24	DADO	EMAIL CORRESPONDENCE WITH VICKI PALMOUR REGARDING NATURAL GAS ACCOUNTS.	B110	0.50	165.00
12/16/24	DADO	REVIEW DOCUMENTS RELATED TO EMAIL CORRESPONDENCE WITH THE SEC.	B110	0.20	66.00
12/16/24	DADO	REVISE FRAUDULENT TRANSFER MEMO.	B110	1.00	330.00
12/16/24	DADO	REVISE INSOLVENCY MEMO.	B110	3.80	1,254.00
12/16/24	DADO	PREPARE FORMS FOR SUBMISSION TO THE CALIFORNIA SECRETARY OF STATE AND FRANCHISE TAX BOARD.	B240	1.50	495.00
12/16/24	DADO	REVISE COVER LETTERS FOR FRANCHISE TAX BOARD MAILING.	B240	1.10	363.00
12/16/24	DADO	REVIEW AND RESPOND TO INVESTOR INQUIRIES.	B240	0.40	132.00



DEBORAH D WILLIAMSON
DEBORAH WILLIAMSON

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JANUARY 31, 2025

DATE	ID	DESCRIPTION	TASK	HOURS	AMOUNT
12/16/24	ALAF	ATTEND TO INVESTOR INQUIRIES.	B110	1.00	230.00
12/17/24	DNR	CORRESPONDENCE WITH DEBORAH D. WILLIAMSON REGARDING BANK ACCOUNTS ITEMS.	B210	0.10	35.00
12/17/24	DNR	CALL WITH DEBORAH D. WILLIAMSON AND SEC COUNSEL REGARDING HEARTLAND ASSETS.	B110	0.50	175.00
12/17/24	DNR	COMPILE ASSET SALE MATERIALS FOR SEC RESPONSE.	B110	0.20	70.00
12/17/24	DNR	CORRESPONDENCE WITH WAB AND STRETTO REGARDING DISTRIBUTION ACCOUNT CLOSURE.	B210	0.20	70.00
12/17/24	DNR	CALL WITH TEAM AND AHUJA & CONSULTANTS REGARDING PENDING IRS ISSUES AND OUTSTANDING BALANCES FOR ENTITIES PRIOR TO CLOSURE.	B240	0.50	175.00
12/17/24	DADO	REVIEW AND RESPOND TO INVESTOR INQUIRIES.	B110	0.80	264.00
12/17/24	DADO	CONFERENCE WITH COUNSEL FOR THE SEC, D.BEHREND AND D.WILLIAMSON REGARDING ASSETS.	B110	0.50	165.00
12/17/24	DADO	CONFERENCE WITH AHUJA & CONSULTANTS, D.BEHREND, AND D.WILLIAMSON REGARDING PENDING TAX ISSUES.	B240	0.50	165.00
12/17/24	DADO	DRAFT NOTICE OF DECEMBER DISTRIBUTION.	B110	0.40	132.00
12/17/24	DADO	REVIEW DOCUMENTS SENT BY AHUJA & CONSULTANTS RELATED TO TAX FILINGS.	B240	0.50	165.00
12/18/24	DADO	REVISE INSOLVENCY MEMO.	B240	0.20	66.00
12/18/24	DADO	REVIEW AND RESPOND TO INVESTOR INQUIRIES.	B110	1.50	495.00
12/18/24	DADO	REVISE TUFTA MEMO.	B110	0.80	264.00
12/19/24	DADO	REVIEW AND RESPOND TO INVESTOR INQUIRIES.	B110	0.90	297.00
12/19/24	DADO	REVISE INSOLVENCY MEMO.	B240	0.60	198.00
12/19/24	DADO	REVISE INVESTOR CHECK SPREADSHEET.	B110	1.20	396.00
12/19/24	DADO	EMAIL CORRESPONDENCE WITH STRETTO REGARDING INVESTOR CHECKS.	B110	0.50	165.00
12/19/24	DADO	DRAFT POWER OF ATTORNEY FOR TEXAS FRANCHISE TAX OFFICE.	B240	0.80	264.00
12/19/24	DADO	EMAIL CORRESPONDENCE WITH TEXAS COMPTROLLER'S OFFICE REGARDING NATURAL GAS ACCOUNTS.	B240	0.20	66.00
12/19/24	DADO	CONFERENCE WITH G.GONZALEZ REGARDING PENDING INVESTOR W-9.	B110	0.20	66.00
12/19/24	DADO	CONFERENCE WITH D.BEHREND AND D.WILLIAMSON REGARDING INVESTOR W-9.	B110	0.10	33.00



DEBORAH D WILLIAMSON
DEBORAH WILLIAMSON

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JANUARY 31, 2025

DATE	ID	DESCRIPTION	TASK	HOURS	AMOUNT
12/20/24	DNR	CALL WITH DOMINIQUE DOUGLAS REGARDING TAXES PAID THROUGHOUT CASE.	B240	0.30	105.00
12/20/24	DNR	CORRESPONDENCE WITH SEC COUNSEL AND DEBORAH D. WILLIAMSON REGARDING POTENTIAL GOVERNMENT SHUTDOWN AND STAY OF CASE.	B110	0.20	70.00
12/20/24	DADO	REVIEW AND RESPOND TO INVESTOR CORRESPONDENCE.	B110	0.70	231.00
12/20/24	DADO	EMAIL CORRESPONDENCE WITH STRETTO REGARDING DISTRIBUTION AND CHECK REISSUANCE.	B110	0.60	198.00
12/20/24	DADO	EMAIL CORRESPONDENCE WITH A.LAFUENTE AND G.GONZALEZ REGARDING INVESTOR W-9.	B110	0.10	33.00
12/20/24	DADO	EMAIL CORRESPONDENCE WITH D.BEHREND AND D.WILLIAMSON REGARDING INVESTOR QUESTIONS.	B110	0.20	66.00
12/20/24	DADO	REVISE INSOLVENCY MEMO.	B240	1.00	330.00
12/20/24	DADO	EMAIL CORRESPONDENCE WITH AHUJA & CONSULTANTS REGARDING MY REQUEST FOR VARIOUS TAX DOCUMENTS.	B240	0.20	66.00
12/20/24	ALAF	ATTEND TO INVESTOR INQUIRIES.	B110	0.70	161.00
12/21/24	DADO	REVISE FRAUDULENT TRANSFER COMPLAINT.	BT160	1.00	330.00
12/22/24	DADO	EMAIL CORRESPONDENCE WITH AHUJA & CONSULTANTS REGARDING INSOLVENCY.	B240	0.10	33.00
12/22/24	DADO	REVIEW AND RESPOND TO INVESTOR INQUIRIES.	B110	0.30	99.00
12/23/24	DNR	CALL WITH DOMINIQUE DOUGLAS REGARDING CALIFORNIA REAL ESTATE INQUIRY.	B120	0.10	35.00
12/23/24	DADO	EMAIL CORRESPONDENCE WITH AHUJA & CONSULTANTS REGARDING INSOLVENCY.	B110	0.20	66.00
12/23/24	DADO	REVIEW AND RESPOND TO INVESTOR INQUIRIES.	B110	0.30	99.00
12/23/24	DADO	EMAIL CORRESPONDENCE WITH TX COMPTROLLER REGARDING NATURAL GAS ACCOUNTS.	B110	0.30	99.00
12/23/24	DADO	EMAIL CORRESPONDENCE WITH STRETTO REGARDING CHECK ISSUANCE.	B110	0.20	66.00
12/23/24	DADO	CALL WITH COMPTROLLERS OFFICE REGARDING NATURAL GAS ACCOUNT.	B110	0.10	33.00
12/23/24	DADO	REVISE CERTIFICATE OF NO OBJECTION.	BT160	0.20	66.00
12/23/24	DADO	DRAFT STATUS REPORT FOR JANUARY 9, 2025 STATUS CONFERENCE.	BT160	1.80	594.00
12/23/24	DADO	RESEARCH LIS PENDENS FOR CALIFORNIA PROPERTY.	B120	0.50	165.00



DEBORAH D WILLIAMSON
DEBORAH WILLIAMSON

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DATE	ID	DESCRIPTION	TASK	HOURS	AMOUNT
12/23/24	DADO	EMAIL CORRESPONDENCE WITH AHUJA & CONSULTANTS AND DEBORAH D. WILLIAMSON REGARDING CTA.	B120	0.40	132.00
12/23/24	DADO	REVIEW AND RESPOND TO INVESTOR INQUIRIES.	B110	0.50	165.00
12/24/24	DADO	EMAIL CORRESPONDENCE WITH AHUJA & CONSULTANTS, DANIELLE BEHREND, AND DEBORAH D. WILLIAMSON REGARDING CTA.	B110	0.20	66.00
12/24/24	JCGI	EXCHANGE EMAILS REGARDING CTA ANALYSIS FOR POTENTIAL ENTITY FILINGS.	BT130	0.40	230.40
12/26/24	JCGI	ANALYZE ENTITY STRUCTURES AND BUSINESSES IN CONNECTION WITH POTENTIALLY REQUIRED CTA FILINGS.	BT130	1.20	691.20
12/26/24	DADO	CONFERENCE WITH AHUJA & CONSULTANTS, D.WILLIAMSON, AND J.GIFFORD REGARDING CTA.	B240	0.50	165.00
12/26/24	DADO	EMAIL CORRESPONDENCE WITH D.BEHREND AND STRETTO REGARDING DISTRIBUTION AND CHECK RE-ISSUANCE.	B110	0.50	165.00
12/26/24	DADO	EMAIL CORRESPONDENCE WITH STRETTO REGARDING DISTRIBUTION.	B240	0.30	99.00
12/26/24	DADO	EMAIL CORRESPONDENCE WITH AHUJA & CONSULTANTS REGARDING CTA.	B240	0.50	165.00
12/30/24	ALAF	ATTEND TO INVESTOR INQUIRIES.	B110	1.50	345.00
12/30/24	DADO	REVIEW AND RESPOND TO INVESTOR INQUIRIES.	B110	0.70	231.00
12/30/24	DADO	DRAFT AND FILE CERTIFICATE OF NO OBJECTION FOR LEADING EDGE, BARRON ENERGY, AOS, AND DODSON PRAIRIE.	B110	0.90	297.00
12/30/24	DADO	CORRESPONDENCE WITH STRETTO REGARDING DECEMBER DISTRIBUTION.	B110	0.20	66.00
12/30/24	DADO	DRAFT AND FILE NOTICE OF DISTRIBUTION.	B110	0.70	231.00
12/30/24	DADO	DRAFT PUBLIC NOTICE OF DISSOLUTION FOR BARRON ENERGY IN WYOMING.	B110	0.70	231.00
12/30/24	DADO	EMAIL CORRESPONDENCE WITH SHERIDAN PRESS REGARDING INVOICE FOR PUBLIC NOTICE.	B110	0.50	165.00
12/30/24	DADO	DRAFT STATUS REPORT FOR STATUS CONFERENCE.	BT155	1.50	495.00
12/30/24	DADO	EMAIL CORRESPONDENCE WITH A.LAFUENTE AND STRETTO REGARDING CHECK RE-ISSUANCE.	B110	0.40	132.00
12/30/24	DADO	EMAIL CORRESPONDENCE WITH D.WILLIAMSON REGARDING STATUS REPORT.	BT155	0.10	33.00
12/30/24	DADO	CONFERENCE WITH A.LAFUENTE REGARDING DISTRIBUTION STATUS AND INVESTOR CORRESPONDENCE.	B110	0.30	99.00



DEBORAH D WILLIAMSON
DEBORAH WILLIAMSON

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DATE	ID	DESCRIPTION	TASK	HOURS	AMOUNT
12/31/24	ALAF	ATTEND TO INVESTOR INQUIRIES.	B110	1.50	345.00
12/31/24	DADO	REVIEW STRETTO'S INVOICES.	B110	0.30	99.00
12/31/24	DADO	EMAIL CORRESPONDENCE WITH A.LAFUENTE REGARDING INVESTOR CORRESPONDENCE.	B110	0.20	66.00
12/31/24	DADO	REVIEW AND RESPOND TO INVESTOR INQUIRIES.	B110	1.00	330.00
12/31/24	DADO	DRAFT AND FILE CERTIFICATE OF NO OBJECTION FOR PANTHER CITY ENERGY.	B110	0.20	66.00
12/31/24	DADO	EMAIL CORRESPONDENCE WITH D.BEHREND'S REGARDING STATUS CONFERENCE.	B110	0.20	66.00
12/31/24	DADO	REVIEW NOTICE OF STATUS CONFERENCE.	B110	0.30	99.00
TOTAL				133.90	\$42,744.60



DEBORAH D WILLIAMSON
DEBORAH WILLIAMSON

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BILLING SUMMARY

ID	TIMEKEEPER	TITLE	HOURS	RATE	AMOUNT
JCGI	JEFFREY GIFFORD	MEMBER	1.60	576.00	921.60
DNR	DANIELLE R. BEHREND	PARTICIPATING MEMBER	13.20	350.00	4,620.00
AMDO	ALANNA M. DOMINGUEZ	ASSOCIATE	0.10	330.00	33.00
DADO	DOMINIQUE A. DOUGLAS	ASSOCIATE	98.00	330.00	32,340.00
ALAF	ADRIANNA LAFUENTE	PARALEGAL	21.00	230.00	4,830.00
TOTAL			133.90		\$42,744.60



DEBORAH D WILLIAMSON
DEBORAH WILLIAMSON

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JANUARY 31, 2025

DISBURSEMENTS

DATE	DESCRIPTION	QUANTITY	RATE	AMOUNT
	DOCKET RESEARCH-COURTLINK	18.00	16.33	294.00
	FEDERAL EXPRESS/DELIVERY	1.00	24.06	24.06
	LEGAL RESEARCH-LEXIS	17.00	33.18	564.10
	PHOTOCOPIES	168.00	0.10	16.80
	PRINTING EXPENSES	714.00	0.10	71.40
	SCANNING	1,738.00	0.10	173.80
	TOTAL DISBURSEMENTS			1,144.16



DEBORAH D WILLIAMSON
DEBORAH WILLIAMSON

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TASK SUMMARY

TASK	TASK DESCRIPTION	HOURS	AMOUNT
B110	CASE ADMINISTRATION	97.30	30,113.00
B120	ASSET ANALYSIS AND RECOVERY	4.30	1,445.00
B130	ASSET DISPOSITION	0.40	140.00
B210	BUSINESS OPERATIONS	5.40	1,880.00
B240	TAX ISSUES	14.20	4,710.00
B310	CLAIMS ADMINISTRATION & OBJECT	2.10	697.00
BT130	BUSINESS ANALYSIS	1.60	921.60
BT155	STATUS REPORTS	1.60	528.00
BT160	LITIGATION CONSULTING	7.00	2,310.00
TOTAL		133.90	42,744.60

EXPENSE SUMMARY

PHOTOCOPIES	16.80
SCANNING	173.80
PRINTING EXPENSES	71.40
FEDERAL EXPRESS/DELIVERY	24.06
LEGAL RESEARCH-LEXIS	564.10
DOCKET RESEARCH-COURTLINK	294.00
TOTAL	1,144.16



400 Renaissance Center • Detroit, MI 48243 • EIN# 38-1446628

DEBORAH D WILLIAMSON
DEBORAH WILLIAMSON
112 E. PECAN
STE. 1800
SAN ANTONIO, TX 78205

DUE UPON RECEIPT

JANUARY 31, 2025
MATTER #: 122686.000003
INVOICE #: 3639148

FOR PROFESSIONAL SERVICES RENDERED

RE: COUNSEL TRAVEL TIME

FEES	\$	231.00
DISBURSEMENTS		13.02
INVOICE TOTAL	\$	244.02



DEBORAH D WILLIAMSON
DEBORAH WILLIAMSON

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JANUARY 31, 2025

RE: COUNSEL TRAVEL TIME

DATE	ID	DESCRIPTION	TASK	HOURS
12/31/24	DADO	TRAVEL TO TEXAS COMPTROLLERS OFFICE TO FILE FINAL TAX RETURNS.	B240	1.40
TOTAL				1.40



DEBORAH D WILLIAMSON
DEBORAH WILLIAMSON

MATTER #: 122686.000003
INVOICE #: 3639148
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JANUARY 31, 2025

BILLING SUMMARY

TIMEKEEPER	HOURS	RATE	AMOUNT
DOMINIQUE A. DOUGLAS	1.40	165.00	231.00
TOTAL	1.40		\$231.00



DEBORAH D WILLIAMSON
DEBORAH WILLIAMSON

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JANUARY 31, 2025

DISBURSEMENTS

DATE	DESCRIPTION	AMOUNT
12/31/24	VENDOR: DOMINIQUE DOUGLAS INVOICE#: 010041950933 DATE: 12/31/2024 - TEXAS COMPTROLLER DOCUMENT DROP OFF - FROM:: 315 CINCINNATI AVENUE, SAN ANTONIO, TX, USA TO:: 10010 SAN PEDRO AVENUE, SAN ANTONIO, TX, USA TO:: 315 CINCINNATI AVENUE, SAN ANTONIO, TX, USA	13.02
TOTAL DISBURSEMENTS		13.02



DEBORAH D WILLIAMSON
DEBORAH WILLIAMSON

MATTER #: 122686.000003
INVOICE #: 3639148
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JANUARY 31, 2025

TASK SUMMARY

TASK	TASK DESCRIPTION	HOURS	AMOUNT
B240	TAX ISSUES	1.40	231.00
TOTAL		1.40	231.00

EXPENSE SUMMARY

TRAVEL-EXCEPT AIRFARE, HOTELS AND MEALS	13.02
TOTAL	13.02

EXHIBIT E-2

Law Offices of Romero | Kozub
8553 North Beach Street, PMB 230
Fort Worth, Texas 76120
682-267-1351

Law Offices of Romero | Kozub

Deborah D Williamson
 112 E. Pecan Street, Suite 1800
 San Antonio, TX 78205
 United States

Balance \$1,870.00
Invoice # 00526
Invoice Date January 22, 2025
Payment Terms
Due Date

SEC v. The Heartland Group Ventures, LLC, et al.

Time Entries

Date	EE	Activity	Description	Rate	Hours	Line Total
10/17/2024	RR	Case Administration	Telephone conference with D. Williamson	\$425.00	0.4	\$170.00
10/17/2024	RR	Case Administration	Attend hearing regarding status of Receivership	\$425.00	0.5	\$212.50
10/30/2024	RR	Case Administration	Meeting with enforcement attorneys with the Iowa Insurance Division and D. Williamson to prepare for testimony	\$425.00	2.4	\$1,020.00
11/14/2024	RR	Case Administration	Attend hearing on Motion to Approve Procedures for Terminating Business Receivership Entities	\$425.00	0.6	\$255.00
12/05/2024	RR	Case Administration	Attend status hearing	\$425.00	0.5	\$212.50

Totals: **4.4** **\$1,870.00**

Time Entry Sub-Total:	\$1,870.00
Sub-Total:	\$1,870.00
Total:	\$1,870.00
Amount Paid:	\$0.00
Balance Due:	\$1,870.00

EXHIBIT E-3

Law Practice of Darrell R. Jones, PLLC

drj@oilesquire.com

(832) 302-5373

November 03, 2024

Deborah Williamson
 Dykema Gossett PLLC
 112 E. Pecan St.
 Ste 1800
 San Antonio, TX 78205

Invoice Number: 1032

Invoice Period: 10-01-2024 - 10-31-2024

Payment Terms: Upon Receipt
 Make check payable to the Law Practice of Darrell R. Jones, PLLC

RE: Receiver for Barron Petroleum LLC, Barron Energy Corporation and Affiliated Entities**Time Details**

Date	Professional	Task	Hours	Rate	Amount
10-14-2024	Eric Hillerman	C300 - Analysis and Advice Work regarding escheat update and land update.	0.50	325.00	162.50
10-23-2024	Eric Hillerman	C300 - Analysis and Advice Work regarding multiple TRRC orders.	0.80	325.00	260.00
Total					422.50

Time Summary

Professional	Hours	Amount
Eric Hillerman	1.30	422.50
Total		422.50

Total for this Invoice 422.50

Client Statement of Account

As of 11-04-2024

Matter	Balance Due
Receiver for Barron Petroleum LLC, Barron Energy Corporation and Affiliated Entities	3,120.00
Total Amount to Pay	3,120.00

Receiver for Barron Petroleum LLC, Barron Energy Corporation and Affiliated Entities

Transactions

Date	Transaction	Applied	Invoice	Amount
10-04-2024	Previous Balance			2,697.50
11-03-2024	Invoice 1032			422.50
			Balance	3,120.00

Open Invoices and Credits

Date	Transaction	Amount	Applied	Balance
08-06-2024	Invoice 1003	1,917.50		1,917.50
09-02-2024	Invoice 1010	552.50		552.50
10-04-2024	Invoice 1022	227.50		227.50
11-03-2024	Invoice 1032	422.50		422.50
			Balance	3,120.00

Deborah Williamson
Dykema Gossett PLLC
112 E. Pecan St.
Ste 1800
San Antonio, TX 78205

November 03, 2024

Law Practice of Darrell R. Jones, PLLC
34 E Wedgemere Cir
Spring, TX 77381

Invoice Number: 1032

Invoice Period: 10-01-2024 - 10-31-2024

REMITTANCE COPY

RE: Receiver for Barron Petroleum LLC, Barron Energy Corporation and Affiliated Entities

Fees	422.50
Total for this Invoice	422.50
Previous Balance	2,697.50

Matter	Balance Due
Receiver for Barron Petroleum LLC, Barron Energy Corporation and Affiliated Entities	3,120.00
Total Amount to Pay	3,120.00

Open Invoices and Credits

Date	Transaction	Matter	Amount	Applied	Balance
08-06-2024	Invoice 1003	Receiver for Barron Petroleum LLC, Barron Energy Corporation and Affiliated Entities	1,917.50		1,917.50
09-02-2024	Invoice 1010	Receiver for Barron Petroleum LLC, Barron Energy Corporation and Affiliated Entities	552.50		552.50
10-04-2024	Invoice 1022	Receiver for Barron Petroleum LLC, Barron Energy Corporation and Affiliated Entities	227.50		227.50
11-03-2024	Invoice 1032	Receiver for Barron Petroleum LLC, Barron Energy Corporation and Affiliated Entities	422.50		422.50
				Balance	3,120.00

Make check payable to the Law Practice of Darrell R. Jones, PLLC.

Law Practice of Darrell R. Jones, PLLC

drj@oilesquire.com

(832) 302-5373

January 03, 2025

Deborah Williamson
 Dykema Gossett PLLC
 112 E. Pecan St.
 Ste 1800
 San Antonio, TX 78205

Invoice Number: 1051

Invoice Period: 12-01-2024 - 12-31-2024

Payment Terms: Upon Receipt
 Make check payable to the Law Practice of Darrell R. Jones, PLLC

RE: Receiver for Barron Petroleum LLC, Barron Energy Corporation and Affiliated Entities**Time Details**

Date	Professional	Task	Hours	Rate	Amount
12-31-2024	Eric Hillerman	C300 - Analysis and Advice Work regarding SDMB Letter to Receiver.	0.30	325.00	97.50
Total					97.50

Time Summary

Professional	Hours	Amount
Eric Hillerman	0.30	97.50
Total		97.50
Total for this Invoice		97.50

Client Statement of Account

As of 01-03-2025

Matter	Balance Due
Receiver for Barron Petroleum LLC, Barron Energy Corporation and Affiliated Entities	1,430.00
Total Amount to Pay	1,430.00

Receiver for Barron Petroleum LLC, Barron Energy Corporation and Affiliated Entities

Transactions

Date	Transaction	Applied	Invoice	Amount
12-02-2024	Previous Balance			1,332.50
01-03-2025	Invoice 1051			97.50
			Balance	1,430.00

Open Invoices and Credits

Date	Transaction	Amount	Applied	Balance
11-03-2024	Invoice 1032	422.50		422.50
12-02-2024	Invoice 1041	910.00		910.00
01-03-2025	Invoice 1051	97.50		97.50
			Balance	1,430.00

EXHIBIT E-4



Ahuja & Consultants, Inc.
Certified Public Accountants

Ahuja & Consultants, Inc.

2901 N. Dallas Pkwy
Suite 320
Plano, TX 75093

Invoice # 8234.HL
Invoice Date: 12/31/2024
Due Date: 01/31/2025

Bill To:
Dykema
Attn: Deborah Williamson

Q4 2024 BILLING SUMMARY

TASK	TASK DESCRIPTION	HOURS	AMOUNT
2900	Accounting/Auditing	206.28	\$45,003.50
3900	Tax Issues	127.40	\$30,990.00
4900	Forensic Accounting	16.70	\$5,212.50
	Expense Reimbursement		\$172.93

TOTAL **\$81,378.93**



Ahuja & Consultants, Inc.
Certified Public Accountants

Ahuja & Consultants, Inc.

2901 N. Dallas Pkwy
Suite 320
Plano, TX 75093

Invoice # 8234.HL
Invoice Date: 12/31/2024
Due Date: 01/31/2025

Bill To:
Dykema
Attn: Deborah Williamson

Q4 2024 BILLING SUMMARY

ID	TIMEKEEPER	TITLE	HOURS	RATE	AMOUNT
AK	Arti Kathiriya	Sr. Associate	2.30	\$180.00	\$414.00
CB	Carolyn Bremer	Engagement Leader	14.70	\$325.00	\$4,777.50
DK	Devon Kwande	Manager	1.20	\$250.00	\$300.00
DS	Divya Shetty	Manager	85.00	\$250.00	\$21,250.00
JB	Jeanne-Marie Blevins	Associate	15.50	\$120.00	\$1,860.00
JH	Jessica Hall	Associate	19.80	\$120.00	\$2,376.00
JW	Jennifer Wallace	Associate	35.80	\$120.00	\$4,296.00
MA	Madhu Ahuja	Engagement Leader	25.50	\$325.00	\$8,287.50
SH	Stacey Huser	Manager	150.58	\$250.00	\$37,645.00

TOTAL 350.38 \$81,206.00



Ahuja & Consultants, Inc.
 Certified Public Accountants

Ahuja & Consultants, Inc.

2901 N. Dallas Pkwy
 Suite 320
 Plano, TX 75093

Invoice # 8234.HL
Invoice Date: 12/31/2024
Due Date: 01/31/2025

Bill To:
 Dykema
 Attn: Deborah Williamson

Q4 2024 EXPENSE REIMBURSEMENT

EXPENSE	AMOUNT
FedEx Reimbursement	\$38.27
Delaware Entity Search	\$80.00
Texas Secretary of State Entity Search	\$1.00
USPS Form 5495	\$53.66

TOTAL \$172.93



Ahuja & Consultants, Inc.
Certified Public Accountants

Ahuja & Consultants, Inc.

2901 N. Dallas Pkwy
Suite 320
Plano, TX 75093

Invoice # 8234.HL
Invoice Date: 12/31/2024
Due Date: 1/31/2025

Bill To:
Dykema
Attn: Deborah Williamson

Date	ID	Description	Task	Hours	Amount
10/01/24	DS	Determine action items with Ms. Ahuja regarding California notice	3900	0.30	\$75.00
10/01/24	SH	Communication with Ms. Williamson, Ms. Ahuja, and Ms. Bremer regarding Receivership updates	4900	0.20	\$50.00
10/01/24	SH	Research on Barron Petroleum transactions for specific parties	4900	0.70	\$175.00
10/01/24	AK	Update Dallas Resources tax return	3900	1.00	\$180.00
10/01/24	CB	Communication with Ms. Williamson, Ms. Ahuja, and Ms. Huser regarding Receivership updates	4900	0.20	\$65.00
10/01/24	CB	Updating Bahamas declaration based on additional funds tracing.	4900	1.30	\$422.50
10/01/24	MA	Communication with Ms. Williamson, Ms. Bremer, and Ms. Huser regarding Receivership updates	3900	0.20	\$65.00
10/01/24	MA	Review Dallas Resources tax return and work papers	3900	2.00	\$650.00
10/02/24	SH	Begin work on gathering asset/cash data for various Sahota entities per SEC request	2900	1.70	\$425.00
10/02/24	SH	Preparation of Alternative Office Solutions LLC Q4 2021 Form 941	2900	0.50	\$125.00
10/02/24	SH	Research Dallas Resources transactions for funds tracing	4900	0.60	\$150.00
10/02/24	CB	Review of Dallas Resources bank statement activity and updates to Bahamas declaration	4900	1.10	\$357.50
10/02/24	CB	Review and updates to Bahamas property declaration	4900	2.70	\$877.50
10/03/24	SH	Review cover letter for Dallas Resources 2018 tax return (30m); summarize outstanding Barron Petroleum payroll tax amounts/tax periods for Advisory (30m); continue work on SEC request (3h)	2900	4.00	\$1,000.00
10/03/24	CB	Update tax liability and other edits to Bahamas declaration	4900	0.80	\$260.00
10/03/24	CB	Finished review of Bahamas property declaration	4900	2.20	\$715.00
10/03/24	SH	Review disclosures for Dallas Resources 2018 tax return	3900	0.30	\$75.00
10/03/24	AK	Continue updating Dallas Resources tax return per instructions from Ms. Ahuja	3900	1.30	\$234.00
10/07/24	SH	Alternative Office Solutions LLC 2021 tax calculations and preparation of Form 940 (1hr); continue work on SEC request (5h)	2900	6.00	\$1,500.00
10/07/24	DS	Contact the California Franchise Tax Board to address the notice received for Heartland Production & Recovery LLC and determine issues to be discussed during meeting with Receiver	3900	0.60	\$150.00
10/07/24	DS	Review Form 940 calculations for Alternative Office Solutions LLC	2900	0.70	\$175.00
10/08/24	MA	Communication with Ms. Williamson and Ms. Huser for open tax and accounting items	2900	0.50	\$162.50

Date	ID	Description	Task	Hours	Amount
10/08/24	SH	Communication with Ms. Williamson and Ms. Ahuja for open tax and accounting items (30m); finalize 2021 Alternative Office Solutions LLC Forms 940 and 941 (30m); continue work on SEC request	2900	5.50	\$1,375.00
10/08/24	DS	Review Form 940 and Form 941 for Alternative Office Solutions LLC	2900	0.80	\$200.00
10/09/24	SH	Continue work on SEC request	2900	2.30	\$575.00
10/10/24	SH	Continue analysis and summary for specific Receivership entities, per SEC request	2900	2.80	\$700.00
10/10/24	SH	Communication with Receiver's office regarding payroll tax documents and filings	2900	0.70	\$175.00
10/11/24	SH	Review and finalize draft summary for SEC request	2900	5.50	\$1,375.00
10/11/24	DS	Summarize the sales proceeds and asset listing for Sahota entities	2900	4.30	\$1,075.00
10/14/24	SH	Review documents received related to Q3 2024 accounting transactions, respond to questions from Receiver's team	2900	3.50	\$875.00
10/14/24	JB	Accounting for the period September 2024	2900	3.60	\$432.00
10/14/24	DS	Prepare 2019, 2020 & 2021 California Tax Return and cover letter	3900	2.50	\$625.00
10/14/24	CB	Review of the Q32024 Quarterly report from Receiver. Follow up with Stretto to obtain details of check disbursements to investors	4900	0.40	\$130.00
10/15/24	SH	Review Q3 2024 accounting	2900	3.50	\$875.00
10/15/24	JB	Continuation of accounting for the period September 2024	2900	2.40	\$288.00
10/15/24	JB	Preparation of Q3 Standard Fund Accounting Report and Receipts and Disbursement Report	2900	7.20	\$864.00
10/15/24	SH	Communication with Ms. Williamson, Ms. Douglas, and Ms. Bremer regarding receivership updates	2900	0.30	\$75.00
10/15/24	CB	Communication with Ms. Williamson, Ms. Douglas, and Ms. Huser regarding receivership updates	4900	0.30	\$97.50
10/16/24	SH	Review Q3 updated draft receipts and disbursements report	2900	3.00	\$750.00
10/16/24	JB	Continuation of preparation of Q3 Standard Fund Accounting Report and Receipts and Disbursement Report	2900	1.80	\$216.00
10/16/24	SH	Review of bank statements and records received regarding funds turned over to Receiver	2900	1.70	\$425.00
10/16/24	DS	Review of bank statements and records received regarding funds turned over to Receiver	2900	2.20	\$550.00
10/17/24	SH	Finalize Q3 Standard Fund Accounting Report and Receipts and Disbursement Report	2900	1.00	\$250.00
10/17/24	SH	Continue finalizing Q3 Standard Fund Accounting Report and Receipts and Disbursement reports (1h); calculate the number of issued but uncleared distribution checks as of quarter end (42m)	2900	1.70	\$425.00
10/17/24	SH	Finalize calculations and response for SEC request	2900	1.00	\$250.00
10/18/24	DS	Review draft motion for termination, identify the points that need to be addressed, and communicate with Ms. Ahuja	2900	2.50	\$625.00
10/20/24	MA	Review Receiver's draft motion for termination of entities and list comments for Receiver	3900	3.00	\$975.00
10/21/24	CB	Respond to Receiver on motion regarding process for entity terminations	4900	0.50	\$162.50
10/21/24	DS	Call the California Franchise Tax Board, Texas Franchise Tax Board, Wyoming Secretary of State	3900	4.20	\$1,050.00
10/23/24	CB	Reviewing and responding to SEC request	4900	0.40	\$130.00
10/23/24	JB	Reviewing and confirming response to SEC request	4900	0.50	\$60.00
11/08/24	DS	Update Form 5495	3900	2.10	\$525.00
11/11/24	DS	Prepare the California Statement of Information, update the California Tax Return (2019 Final Return), research the process of reviving, dissolving and cancelling for Heartland Production and Recovery entity in California	3900	3.50	\$875.00

Date	ID	Description	Task	Hours	Amount
11/11/24	SH	Review research and drafts of documents for dissolution of Heartland Production and Recovery Fund in California	3900	2.00	\$500.00
11/11/24	SH	Review Forms 5495	3900	1.00	\$250.00
11/12/24	MA	Review payroll tax matrix by quarter, call with Ms. Williamson, Ms. Huser regarding outstanding taxes	3900	1.00	\$325.00
11/12/24	SH	Continue review of Forms 5495	3900	1.30	\$325.00
11/12/24	CB	Communication with Ms. Williamson, Ms. Huser and Ms. Ahuja regarding receivership updates	4900	0.50	\$162.50
11/12/24	JW	Data entry of October transactions from bank statements	2900	3.00	\$360.00
11/12/24	DS	Revise Form 5495, contact the California Secretary of State and the IRS to request transcripts, and download the transcripts	3900	3.50	\$875.00
11/12/24	SH	Communication with Ms. Williamson, Ms. Douglas, Ms. Ahuja, and Ms. Bremer to discuss status of open tax and accounting items	2900	0.50	\$125.00
11/12/24	SH	Review IRS notices and calculation of tax due	2900	2.50	\$625.00
11/13/24	SH	Review of California documentation for closure of Heartland Production and Recovery	2900	0.70	\$175.00
11/13/24	DS	Continue updating Forms 5495, prepare California Franchise Tax Return for Heartland Production and Recovery LLC	3900	8.00	\$2,000.00
11/13/24	SH	Review and analysis of open tax balances and calculation of penalty/interest estimates for Receivership entity	2900	5.50	\$1,375.00
11/13/24	JW	Accounting related to data entry in preparation for October reconciliation of bank accounts	2900	2.00	\$240.00
11/14/24	SH	Communication with Ms. Williamson, Ms. Ahuja, and Ms. Shetty to discuss payroll tax	2900	0.50	\$125.00
11/14/24	SH	Review and analysis of payroll tax, penalty, and interest amounts for Barron Petroleum	2900	4.50	\$1,125.00
11/14/24	DS	Payroll analysis for Barron Petroleum, attend the meeting with Ms. Huser, Ms. Ahuja & Ms. Williamson to discuss tax and accounting items and work on Form 5495 and the state returns	3900	5.80	\$1,450.00
11/14/24	MA	Review payroll tax matrix by quarter, call with Ms. Williamson, Ms. Huser regarding outstanding taxes	3900	1.00	\$325.00
11/15/24	JW	Enter data from monthly transactions from bank statements	2900	4.20	\$504.00
11/15/24	SH	Begin review of updated Forms 5495, preparation of IRS letters	2900	2.00	\$500.00
11/18/24	SH	Review of documents, update calculations, preparation and review of letters for response to IRS notices (3h); update information for Bahamas declaration (36m)	2900	3.60	\$900.00
11/18/24	CB	Communication with Ms. Douglas regarding the Bahamas tracing declaration and related research	4900	0.50	\$162.50
11/19/24	JW	Developing a closing entity tax matrix in response to request from the Receiver	2900	3.00	\$360.00
11/19/24	SH	Review initial status matrix for receivership entities for closing process (1h36m); provide documentation regarding balance sheets for operating entities, per request (24m)	2900	2.00	\$500.00
11/20/24	JW	Finish researching and compiling draft entity tax matrix	2900	3.10	\$372.00
11/20/24	MA	Respond to questions from Receiver	3900	0.50	\$162.50
11/20/24	SH	Review and complete packet for IRS letters and payments	2900	2.50	\$625.00
11/21/24	MA	Review tax liability matrix	3900	2.00	\$650.00
11/21/24	SH	Receivership entity status matrix review and steps for closing entities	2900	5.50	\$1,375.00
11/22/24	SH	Review and update Receivership entity status matrix	2900	6.70	\$1,675.00
11/22/24	MA	Continue review of tax liability matrix	3900	2.00	\$650.00
11/25/24	DS	Update questions regarding Form 5495	3900	0.50	\$125.00
11/25/24	CB	Analyzing and responding to request from Receiver regarding insolvency tests for Barron and ArcoOil Corp	4900	0.40	\$130.00
11/26/24	DS	Review the asset value spreadsheet from the beginning of the receivership alongside the tax returns to verify the asset values	3900	0.40	\$100.00

Date	ID	Description	Task	Hours	Amount
12/02/24	MA	Review responses and agenda items for meeting	3900	0.50	\$162.50
12/02/24	DS	Review the SEC query, review the cover letters for Forms 5495, and contact the IRS to request transcripts	3900	2.70	\$675.00
12/02/24	SH	Preparation of draft letters for filing with Forms 5495	2900	3.80	\$950.00
12/02/24	SH	Review data pertaining to SEC questions	2900	0.70	\$175.00
12/03/24	SH	Build distribution workbook and associated investor funds to allocate distribution payments	2900	3.50	\$875.00
12/03/24	CB	Communication with Ms. Williamson, Ms. Douglas, Ms. Ahuja and Ms. Huser regarding Receivership updates	4900	0.90	\$292.50
12/03/24	MA	Communication with Ms. Williamson, Ms. Douglas, Ms. Huser, Ms. Bremer, and Ms. Shetty to discuss tax and accounting issues	3900	0.90	\$292.50
12/03/24	MA	Review methodology for distribution allocations	3900	0.50	\$162.50
12/03/24	SH	Update draft asset notes for SEC inquiry	2900	0.50	\$125.00
12/03/24	SH	Communication with Ms. Williamson, Ms. Douglas, Ms. Ahuja, Ms. Bremer, and Ms. Shetty to discuss tax and accounting issues	2900	0.90	\$225.00
12/03/24	SH	Update methodology for distribution allocations	2900	0.50	\$125.00
12/03/24	DS	Communication with Ms. Huser, Ms. Ahuja, Ms. Bremer, Ms. Williamson, Ms. Douglas for open items on tax (54 minutes); draft methodology for distribution allocations (30 minutes); contact the IRS for transcripts (6 minutes)	3900	1.50	\$375.00
12/04/24	JH	Print income tax returns to attach to Form 5495	3900	1.80	\$216.00
12/04/24	MA	Review of balance sheet for Barron Petroleum and ArcoOil Corp for insolvency analysis	3900	0.70	\$227.50
12/04/24	DS	Print Form 5495 and supporting documents and continue working on insolvency analysis	3900	1.00	\$250.00
12/04/24	SH	Begin building historical financial statements based on general ledger documents for insolvency test	2900	1.70	\$425.00
12/05/24	JH	Continue printing tax returns for Form 5495	3900	7.20	\$864.00
12/05/24	MA	Email communication with Receiver	3900	0.20	\$65.00
12/05/24	DS	Add supporting documentation for Form 5495	3900	1.20	\$300.00
12/05/24	SH	Review and update responses to SEC inquiry	2900	1.50	\$375.00
12/05/24	SH	Continue building historical financial statements based on general ledger documents for insolvency test	2900	2.50	\$625.00
12/06/24	SH	Analysis of Barron Petroleum general ledger data for insolvency financials	2900	4.50	\$1,125.00
12/06/24	MA	Review Texas Franchise Tax Report for Panther City	3900	2.00	\$650.00
12/06/24	JH	Continue printing tax returns for Form 5495	3900	6.10	\$732.00
12/06/24	DS	Review the supporting documents print for Form 5495	3900	2.20	\$550.00
12/06/24	DS	Work on the ArcoOil Corp financials for insolvency analysis	3900	2.20	\$550.00
12/06/24	DS	Review Panther City Energy, LLC's filings on the Texas Secretary of State website	3900	0.70	\$175.00
12/09/24	DS	Determine tax returns that need to be sent to the IRS along with Form 5495 and scan the returns	3900	7.20	\$1,800.00
12/09/24	MA	Review of 2021 Panther City TX Franchise tax	3900	0.30	\$97.50
12/09/24	SH	Continue analysis of data and preparation of adjusted balance sheet accounts for insolvency tests	2900	5.00	\$1,250.00
12/09/24	JH	Continue printing tax returns for Form 5495	3900	4.70	\$564.00
12/09/24	SH	Review and updates to draft SEC inquiry	2900	0.50	\$125.00
12/10/24	DS	Call the Texas Comptroller for the tax return of Panther City Energy LLC and prepare the Texas Franchise tax return and verify the document to be sent to IRS	3900	6.30	\$1,575.00
12/10/24	SH	Continue analysis of data and preparation of adjusted balance sheet accounts for insolvency tests	2900	4.00	\$1,000.00
12/10/24	CB	Communication with Ms. Williamson, Ms. Douglas, Ms. Ahuja and Ms. Huser regarding Receivership updates	4900	0.80	\$260.00

Date	ID	Description	Task	Hours	Amount
12/10/24	MA	Communication with Ms. Williamson, Ms. Douglas, Ms. Huser, and Ms. Bremer regarding open tax and accounting items	3900	0.80	\$260.00
12/10/24	SH	Communication with Ms. Williamson, Ms. Douglas, Ms. Ahuja, and Ms. Bremer regarding open tax and accounting items	2900	0.80	\$200.00
12/11/24	SH	Continue analysis of data and preparation of adjusted balance sheet accounts for insolvency tests	2900	3.20	\$800.00
12/11/24	MA	Meeting with Ms. Shetty & Ms. Huser regarding mailing Form 5495 to resolve questions regarding the payroll and income Form 5495 package	3900	0.80	\$260.00
12/11/24	MA	Work on insolvency analysis	3900	2.00	\$650.00
12/11/24	SH	Communication with Ms. Ahuja and Ms. Shetty regarding mailing Forms 5495	2900	0.80	\$200.00
12/11/24	SH	Adjusted balance sheet for insolvency tests	2900	0.70	\$175.00
12/11/24	JW	Accounting related to reconciliation of October Western Alliance bank accounts	2900	3.00	\$360.00
12/11/24	DS	Communication with Ms. Ahuja & Ms. Huser regarding mailing Form 5495	3900	0.80	\$200.00
12/12/24	SH	Continue analysis of data and preparation of adjusted balance sheet accounts for insolvency tests	2900	5.30	\$1,325.00
12/12/24	DS	Update the California tax returns and cover letter for HPAR LLC and start preparing the Final Texas state returns for Alternative Office Solution, Leading Edge Energy, Dodson Prairie Oil & Gas & Panther City Energy & Barron Energy Corporation	3900	3.50	\$875.00
12/12/24	SH	Review Heartland Production and Recovery LLC California tax returns	2900	0.20	\$50.00
12/13/24	DS	Prepare the state and California tax returns, work on the ArcoOil Corp asset worksheet in relation to insolvency analysis, and prepare the 2023 closing balance sheet for discussion with the receiver	3900	5.50	\$1,375.00
12/13/24	MA	Email communication with Receiver	3900	0.20	\$65.00
12/13/24	MA	Revise letter to CA	3900	0.50	\$162.50
12/13/24	SH	Continue analysis of data and preparation of adjusted balance sheet accounts for insolvency tests	2900	4.50	\$1,125.00
12/13/24	JW	Enter data from checks from bank statement and distribution check registers	2900	3.00	\$360.00
12/13/24	CB	Review of Receiver comments on Bahamas tracing exhibits.	4900	0.50	\$162.50
12/16/24	JW	Enter data from checks from bank statement and distribution check registers	2900	3.00	\$360.00
12/16/24	SH	Continue analysis of general ledger data and preparation of adjusted balance sheet accounts for insolvency tests	2900	5.50	\$1,375.00
12/16/24	MA	Barron Petroleum - review of work paper regarding AJE's in Barron Petroleum	3900	1.00	\$325.00
12/16/24	DS	Closing the Texas & Wyoming entities and prepare the cover letter	3900	3.40	\$850.00
12/16/24	SH	Review cover letters, tax returns, dissolution documents	2900	1.00	\$250.00
12/17/24	DS	Call the IRS for transcript, attend the meeting with Ms. Huser, Ms. Ahuja, Ms. Williamson to discuss tax & accounting open items, update the Texas Franchise Tax Return	3900	2.10	\$525.00
12/17/24	SH	Review and analysis of general ledger transactions for insolvency test (3h6m); review tax return updates (12m)	2900	3.30	\$825.00
12/17/24	JW	Enter data from cleared check information from bank statements	2900	2.00	\$240.00
12/17/24	SH	Communication with Ms. Williamson, Ms. Douglas, Ms. Ahuja, and Ms. Shetty regarding open accounting and tax items	2900	0.50	\$125.00
12/17/24	MA	Communication with Ms. Williamson, Ms. Douglas, Ms. Huser, and Ms. Shetty regarding open accounting and tax items	3900	0.50	\$162.50
12/18/24	DS	Work on the insolvency analysis spreadsheet	3900	1.30	\$325.00
12/18/24	SH	Review and analysis of general ledger transactions for insolvency tests	2900	3.30	\$825.00

Date	ID	Description	Task	Hours	Amount
12/18/24	JW	Reconciliation of Western Alliance October bank accounts	2900	2.80	\$336.00
12/19/24	DS	ArcoOil Corp - download the asset details for insolvency analysis	3900	1.50	\$375.00
12/20/24	JW	Data entry and reconciliation of Western Alliance October and November bank accounts	2900	6.70	\$804.00
12/20/24	SH	Prepare summary listing of all pre-receivership taxes due for ArcoOil Corp and Barron Petroleum	2900	4.58	\$1,145.00
12/20/24	MA	Work on request from Receiver regarding liabilities for ArcoOil Corp and Barron	3900	2.00	\$650.00
12/20/24	CB	Edits to Bahamas property tracing based on Receiver comments.	4900	1.20	\$390.00
12/26/24	DK	Beneficial Ownership Information: drafting email and research	3900	0.80	\$200.00
12/26/24	DK	Call regarding Fin Cen filing with Ms. Williamson, Ms. Ahuja, Mr. Gifford and Ms. Douglas	3900	0.40	\$100.00
12/26/24	MA	Call regarding Fin Cen filing with Ms. Williamson, Mr. Kwande, Mr. Gifford and Ms. Douglas	3900	0.40	\$130.00

Total **\$81,206.00**

Balance Due **\$81,206.00**

NOTE: Total Fees are net of write-off fees of \$5,332.50 primarily related to internal communications.

EXHIBIT E-5



Case Name: Heartland

Summary of Hourly Fees

Date Range: 10/01/2024 - 10/31/2024

Role	Hours	Rate	Total
Analyst II	1.1	\$40.00	\$44.00
Analyst III	0.1	\$50.00	\$5.00
Associate I	1.2	\$65.00	\$78.00
Associate II	0.2	\$97.50	\$19.50
Associate III	1.3	\$130.00	\$169.00
Director I	5.5	\$175.00	\$962.50
Director II	47.5	\$185.00	\$8,787.50
Managing Director II	8.9	\$205.00	\$1,824.50
Managing Director III	0.6	\$210.00	\$126.00
Senior Associate I	22.3	\$135.00	\$3,010.50
Senior Associate III	7.1	\$165.00	\$1,171.50
Total			\$16,198.00



Case Name: Heartland

Time Detail

Date Range: 10/01/2024 - 10/31/2024

Date	Employee Name	Role	Task	Description	Hours
10/01/2024	Jason Bouzos	Senior Associate	Case Administration	Initiate stop payments on checks due to reissue	0.5
10/01/2024	Micheal Hale	Senior Associate	Case Administration	Review bank data to identify cleared checks and reconcile account for ledger detail report	0.7
10/01/2024	Morgan Wisbey	Director	Case Administration	Communication with R.Saraceni via email re: Check status	0.2
10/01/2024	Robert Saraceni	Director	Case Administration	Prepare and forward distribution reports for initial 9.11.2024 as requested by D. Behrends	0.2
10/01/2024	Robert Saraceni	Director	Case Administration	Prepare and forward W-9 status reports for Class 4 and 4a to Receiver as requested. Process additional W-9 additions.	1.5
10/01/2024	Stephen Cady	Managing Director	Case Administration	Review distributions related communication and activity, and advise team re: same	0.3
Subtotal 10/01/2024					3.4

Date	Employee Name	Role	Task	Description	Hours
10/02/2024	Aimee Marshall	Associate	Case Administration	Generate service of Heartland_W9 Letter 10.2.24 mailing including printing and fulfillment	0.1
10/02/2024	Aimee Marshall	Associate	Case Administration	Generate service of Distribution reissue checks mailing including printing and fulfillment	0.2
10/02/2024	Antonio Rubio	Associate	Case Administration	Generate service of Heartland_W9 Letter 10.2.24 mailing including printing and fulfillment	0.2
10/02/2024	Daniel Ramirez	Senior Associate	Case Administration	Coordinate service for W9 Letter 10.2.24	1.0
10/02/2024	Jason Bouzos	Senior Associate	Case Administration	Complete ledger maintenance to assist with account reconciliation	0.4
10/02/2024	Jenice Alduenda	Director	Case Administration	Prepare reissue checks	0.7
10/02/2024	Jenice Alduenda	Director	Case Administration	Prepare reissue checks and complete QC	0.4
10/02/2024	Jenice Alduenda	Director	Case Administration	Send check to production for Locke Lorde content to be added on check distribution before processed and released	0.4
10/02/2024	Jenice Alduenda	Director	Case Administration	Send to production for printing	0.4
10/02/2024	Kevin Wasserman	Senior Associate	Case Administration	Prepare mailing	0.5
10/02/2024	Melissa Membrino	Director	Case Administration	Coordinate service of Heartland_W9 Letter 10.2.24 mailing including printing and fulfillment	0.3
10/02/2024	Micheal Hale	Senior Associate	Case Administration	Review bank data to identify cleared checks and reconcile account for ledger detail report	0.7
10/02/2024	Morgan Wisbey	Director	Case Administration	Generate ledger report to review status of distributions	0.2

Date	Employee Name	Role	Task	Description	Hours
10/02/2024	Morgan Wisbey	Director	Case Administration	Review check images for quality control and fraud mitigations	0.2
10/02/2024	Morgan Wisbey	Director	Case Administration	Communication with R.Saraceni via email re: check reissues	0.2
10/02/2024	Morgan Wisbey	Director	Case Administration	Communication with J.Alduenda via email re: check reissues	0.2
10/02/2024	Ricky Quang	Associate	Case Administration	Generate service of Heartland_W9 Letter 10.2.24 mailing including printing and fulfillment	0.2
10/02/2024	Robert Saraceni	Director	Case Administration	Update for additional W-9s received and process address updates	0.3
10/02/2024	Robert Saraceni	Director	Case Administration	Prepare mailing file for W-9 mailing to those investors needing to send in W-9, discuss with team.	0.4
10/02/2024	Stephen Cady	Managing Director	Case Administration	Review distributions related communication and activity, and advise team re: same	0.2
10/02/2024	Stephen Cady	Managing Director	Case Administration	Review distributions related communication and activity, and advise team re: same	0.7
Subtotal 10/02/2024					7.9

Date	Employee Name	Role	Task	Description	Hours
10/03/2024	Aimee Marshall	Associate	Case Administration	Generate service of Heartland_W 9 Mailing 10.3.24 mailing including printing and fulfillment	0.1
10/03/2024	Charles Wheeler	Associate	Case Administration	Administrative review of mailing details	0.1
10/03/2024	Daniel Ramirez	Senior Associate	Case Administration	Draft Certificate of Service for physical service on 10.1.24 and 10.2.24	1.8
10/03/2024	Daniel Ramirez	Senior Associate	Case Administration	Coordinate service for W9 Letter 10.3.24	1.0
10/03/2024	Jenice Alduenda	Director	Case Administration	Input reissued checks into positive pay for decisioning	0.2
10/03/2024	Kevin Wasserman	Senior Associate	Case Administration	Prepare mailing	0.5
10/03/2024	Micheal Hale	Senior Associate	Case Administration	Review bank data to identify cleared checks and reconcile account for ledger detail report	1.8
10/03/2024	Morgan Wisbey	Director	Case Administration	Communication with R.Saraceni via email re: Confirmation of check mailing	0.2
10/03/2024	Ricky Quang	Associate	Case Administration	Generate service of Heartland_W 9 Mailing 10.3.24 mailing including printing and fulfillment	0.2
10/03/2024	Robert Saraceni	Director	Case Administration	Prepare certificate of service for 10.2.2024 W-9 mailing and forward to D. Behrends and D. Douglas as requested.	0.8
10/03/2024	Robert Saraceni	Director	Case Administration	Prepare mailing file and letter for W-9 re-mail to updated addresses.	0.3
10/03/2024	Robert Saraceni	Director	Case Administration	Review, research and download all files related to Class 9 creditor and forward to Receiver (.4); Exchange correspondence, research and confirm distribution status of Class 9 creditor (.3)	0.7
10/03/2024	Stephen Cady	Managing Director	Case Administration	Review distributions related communication and activity, and advise team re: same	0.5
Subtotal 10/03/2024					8.2

Date	Employee Name	Role	Task	Description	Hours
10/04/2024	Micheal Hale	Senior Associate	Case Administration	Review bank data to identify cleared checks and reconcile account for ledger detail report	0.9

Date	Employee Name	Role	Task	Description	Hours
10/04/2024	Morgan Wisbey	Director	Case Administration	Communication with Heartland Team via email re: check clearing status	0.2
10/04/2024	Morgan Wisbey	Director	Case Administration	Research check status	0.5
10/04/2024	Morgan Wisbey	Director	Case Administration	Generate Ledger Report per R.Saraceni	0.2
10/04/2024	Robert Saraceni	Director	Case Administration	Update distribution master files and registers for reissues	0.8
10/04/2024	Stephanie Morales	Analyst	Case Administration	Shred undeliverable check re: various checks	0.1
10/04/2024	Stephen Cady	Managing Director	Case Administration	Review distributions related communication and activity, and advise team re: same	0.4
Subtotal 10/04/2024					3.1

Date	Employee Name	Role	Task	Description	Hours
10/07/2024	Jason Bouzos	Senior Associate	Case Administration	Provide check images regarding bank address update	0.3
10/07/2024	Jason Bouzos	Senior Associate	Case Administration	Coordinate check production, including import of data into case management system, generation and quality control of check images, and submission of print request	0.6
10/07/2024	Jenice Alduenda	Director	Case Administration	Communicate stop payment with bank for processing	0.3
10/07/2024	Laura Tondreault	Analyst	Case Administration	Prepare and organize general case documents for accuracy and completeness	0.1
10/07/2024	Micheal Hale	Senior Associate	Case Administration	Request for stop payment as check will be reissued	0.1
10/07/2024	Micheal Hale	Senior Associate	Case Administration	Review bank data to identify cleared checks and reconcile account for ledger detail report	0.6
10/07/2024	Morgan Wisbey	Director	Case Administration	Coordinate check production, including generation and quality control of check images, and submission of print request	0.7
10/07/2024	Naomi Rodriguez	Associate	Case Administration	Administrative review of mailing details	0.1
10/07/2024	Robert Saraceni	Director	Case Administration	Begin address reconciliation as requested by Receiver; Prepare updated second distribution eligibility list.	6.3
10/07/2024	Ruben Guevara	Senior Associate	Case Administration	Coordinate check stop and reissue	1.6
10/07/2024	Stephanie Morales	Associate	Case Administration	Administrative review of mailing details	0.1
10/07/2024	Stephen Cady	Managing Director	Case Administration	Review distributions related communication and activity, and advise team re: same	0.8
Subtotal 10/07/2024					11.6

Date	Employee Name	Role	Task	Description	Hours
10/08/2024	Aimee Marshall	Associate	Case Administration	Generate service of 2024.10.08 Heartland Locke Lord Reissue mailing including printing and fulfillment	0.2
10/08/2024	Jason Bouzos	Senior Associate	Case Administration	Review wire for quality control and fraud mitigations	0.4
10/08/2024	Jenice Alduenda	Director	Case Administration	Handle positive pay entry for reissued checks	0.4
10/08/2024	Micheal Hale	Senior Associate	Case Administration	Review bank data to identify cleared checks and reconcile account for ledger detail report	0.5

Date	Employee Name	Role	Task	Description	Hours
10/08/2024	Morgan Wisbey	Director	Case Administration	Generate ledger report per R.Saraceni	0.5
10/08/2024	Morgan Wisbey	Director	Case Administration	Communication with Heartland Team via email re: check mailing	0.2
10/08/2024	Morgan Wisbey	Director	Case Administration	Communication with R.Saraceni via email re: confirm check mailing	0.2
10/08/2024	Robert Saraceni	Director	Case Administration	Perform reconciliation of second distribution allowed amounts and Class 4 and Class 4a distribution calculations	1.1
10/08/2024	Ruben Guevara	Senior Associate	Case Administration	Coordinate check reissue	0.5
10/08/2024	Ruben Guevara	Senior Associate	Case Administration	Process positive pay in Western Alliance bank portal	0.2
10/08/2024	Stephen Cady	Managing Director	Case Administration	Review distributions related communication and activity, and advise team re: same	0.6
Subtotal 10/08/2024					4.8

Date	Employee Name	Role	Task	Description	Hours
10/09/2024	Micheal Hale	Senior Associate	Case Administration	Review bank data to identify cleared checks and reconcile account for ledger detail report	0.3
10/09/2024	Robert Saraceni	Director	Case Administration	Continue address reconciliation	3.8
10/09/2024	Robert Saraceni	Director	Case Administration	Continue address reconciliation; prepare Class 4 second distribution final file	2.8
Subtotal 10/09/2024					6.9

Date	Employee Name	Role	Task	Description	Hours
10/10/2024	Micheal Hale	Senior Associate	Case Administration	Review bank data to identify cleared checks and reconcile account for ledger detail report	0.4
10/10/2024	Morgan Wisbey	Director	Case Administration	Communication with R.Saraceni via email re: distribution timeline	0.2
10/10/2024	Morgan Wisbey	Director	Case Administration	Review data and set distribution timeline	0.5
10/10/2024	Robert Saraceni	Director	Case Administration	Reconcile and prepare Class 4a second distribution final file.	2.8
10/10/2024	Stephen Cady	Managing Director	Case Administration	Review distributions related communication and activity, and advise team re: same	0.3
Subtotal 10/10/2024					4.2

Date	Employee Name	Role	Task	Description	Hours
10/11/2024	Micheal Hale	Senior Associate	Case Administration	Review bank data to identify cleared checks and reconcile account for ledger detail report	0.4
Subtotal 10/11/2024					0.4

Date	Employee Name	Role	Task	Description	Hours
10/14/2024	Micheal Hale	Senior Associate	Case Administration	Review bank data to identify cleared checks and reconcile account for ledger detail report	0.6
10/14/2024	Robert Saraceni	Director	Case Administration	Update distribution amounts for class 4 and 4a for recalculation of beneficiary allocations	0.8
10/14/2024	Robert Saraceni	Director	Case Administration	Provide distribution reports by class for first distribution as requested by C. Bremer.	0.2

Date	Employee Name	Role	Task	Description	Hours
10/14/2024	Stephanie Morales	Associate	Case Administration	Administrative review of mailing details	0.1
10/14/2024	Stephen Cady	Managing Director	Case Administration	Review distributions related communication and activity, and advise team re: same	0.2
Subtotal 10/14/2024					1.9

Date	Employee Name	Role	Task	Description	Hours
10/15/2024	Jenice Alduenda	Director	Case Administration	Conduct bank account security maintenance by reviewing account access settings	0.1
10/15/2024	Micheal Hale	Senior Associate	Case Administration	Review bank data to identify cleared checks and reconcile account for ledger detail report	0.3
10/15/2024	Morgan Wisbey	Director	Case Administration	Coordinate check production, including import of data into case management system, generation and quality control of check images	1.5
10/15/2024	Robert Saraceni	Director	Case Administration	Reconcile check register to files for Class 4, 4a and 5.	1.5
10/15/2024	Stephen Cady	Managing Director	Case Administration	Review distributions related communication and activity, and advise team re: same	0.4
Subtotal 10/15/2024					3.8

Date	Employee Name	Role	Task	Description	Hours
10/16/2024	Micheal Hale	Senior Associate	Case Administration	Review bank data to identify cleared checks and reconcile account for ledger detail report	0.3
10/16/2024	Micheal Hale	Senior Associate	Case Administration	Review check images for quality control and fraud mitigations	1.0
10/16/2024	Robert Saraceni	Director	Case Administration	Review proposed Class 4 and class 4a distribution files forwarded to Receiver by M. Wisbey, edit and forward cover letter to M. Wisbey.	0.6
10/16/2024	Stephen Cady	Managing Director	Case Administration	Review distributions related communication and activity, and advise team re: same	0.3
Subtotal 10/16/2024					2.2

Date	Employee Name	Role	Task	Description	Hours
10/17/2024	Aimee Marshall	Associate	Case Administration	Generate service of Heartland 2nd Distribution Class 4 2024.10.17 mailing including printing and fulfillment	0.3
10/17/2024	Aimee Marshall	Associate	Case Administration	Generate service of Heartland Locke Lord Class 4a 2nd Distribution mailing including printing and fulfillment	0.3
10/17/2024	Jason Bouzos	Senior Associate	Case Administration	Review check images for quality control and fraud mitigations	1.4
10/17/2024	Jose Cruz	Associate	Case Administration	Review distribution request and format data for check production	0.3
10/17/2024	Melissa Membrino	Director	Case Administration	Coordinate service of Heartland 2nd Distribution Class 4 2024.10.17 mailing including printing and fulfillment	0.4
10/17/2024	Melissa Membrino	Director	Case Administration	Coordinate service of Heartland Locke Lord Class 4a 2nd Distribution mailing including printing and fulfillment	0.4
10/17/2024	Micheal Hale	Senior Associate	Case Administration	Review check images for quality control and fraud mitigations	2.1
10/17/2024	Micheal Hale	Senior Associate	Case Administration	Review bank data to identify cleared checks and reconcile account for ledger detail report	0.3
10/17/2024	Morgan Wisbey	Director	Case Administration	Coordinate check production, including import of data into case management system, generation and quality control of check images, and submission of print request	1.7

Date	Employee Name	Role	Task	Description	Hours
10/17/2024	Robert Saraceni	Director	Case Administration	Review and respond to M. Wisby inquiry re: cover letter date.	0.2
10/17/2024	Sheryl Betance	Managing Director	Case Administration	Facilitate service of Heartland 2nd Distribution Class 4 2024.10.17 mailing	0.3
10/17/2024	Sheryl Betance	Managing Director	Case Administration	Facilitate service of Heartland Locke Lord Class 4a 2nd Distribution mailing	0.3
10/17/2024	Stephen Cady	Managing Director	Case Administration	Review distributions related communication and activity, and advise team re: same	1.1
Subtotal 10/17/2024					9.1

Date	Employee Name	Role	Task	Description	Hours
10/18/2024	Jenice Alduenda	Director	Case Administration	Upload Positive Pay files for each account issuing a distribution	1.5
10/18/2024	Micheal Hale	Senior Associate	Case Administration	Review bank data to identify cleared checks and reconcile account for ledger detail report	0.3
10/18/2024	Morgan Wisbey	Director	Case Administration	Generate positive pay report for Western Alliance Bank	0.5
10/18/2024	Robert Saraceni	Director	Case Administration	Update for W-9's received	0.2
10/18/2024	Robert Saraceni	Director	Case Administration	Review and update distribution files for cleared checks.	1.7
10/18/2024	Stephen Cady	Managing Director	Case Administration	Review distributions related communication and activity, and advise team re: same	0.5
Subtotal 10/18/2024					4.7

Date	Employee Name	Role	Task	Description	Hours
10/21/2024	Jason Bouzos	Senior Associate	Case Administration	Process stop payment and reissue	1.2
10/21/2024	Jason Bouzos	Senior Associate	Case Administration	Add check reissue to positive pay to assist with check clearing	0.5
10/21/2024	Micheal Hale	Senior Associate	Case Administration	Review bank data to identify cleared checks and reconcile account for ledger detail report	0.3
10/21/2024	Morgan Wisbey	Director	Case Administration	Communication with R. Saraceni via email re: stop and reissue	0.2
10/21/2024	Robert Saraceni	Director	Case Administration	Review and respond to D. Douglas request for check reissue.	0.2
10/21/2024	Stephanie Morales	Analyst	Case Administration	Record and track undeliverable mail re: Distribution Checks	0.1
10/21/2024	Stephanie Morales	Analyst	Case Administration	Record and track undeliverable mail re: various mailings	0.1
10/21/2024	Stephanie Morales	Analyst	Case Administration	Capture and track undeliverable mail images	0.1
10/21/2024	Stephen Cady	Managing Director	Case Administration	Review distributions related communication and activity, and advise team re: same	0.5
Subtotal 10/21/2024					3.2

Date	Employee Name	Role	Task	Description	Hours
10/22/2024	Jason Bouzos	Senior Associate	Case Administration	Submit request to reverse stop payment fee	0.4
10/22/2024	Micheal Hale	Senior Associate	Case Administration	Review bank data to identify cleared checks and reconcile account for ledger detail report	0.5

Date	Employee Name	Role	Task	Description	Hours
10/22/2024	Morgan Wisbey	Director	Case Administration	Generate stop payment and reissue	0.5
10/22/2024	Stephanie Morales	Analyst	Case Administration	Record and track undeliverable mail re: various mailings	0.1
10/22/2024	Stephen Cady	Managing Director	Case Administration	Review distributions related communication and activity, and advise team re: same	0.3
Subtotal 10/22/2024					1.8

Date	Employee Name	Role	Task	Description	Hours
10/23/2024	Micheal Hale	Senior Associate	Case Administration	Review bank data to identify cleared checks and reconcile account for ledger detail report	0.3
10/23/2024	Naomi Rodriguez	Associate	Case Administration	Administrative review of mailing details	0.2
10/23/2024	Robert Saraceni	Director	Case Administration	Review, research and respond to D. Behrends' inquiry into status of Class 4 and Class 4a distribution to investor.	0.4
10/23/2024	Robert Saraceni	Director	Case Administration	Update for W-9 received (.2); update address per W-9 (.2)	0.4
10/23/2024	Staphany Alcantar	Analyst	Case Administration	Case file case related documents	0.2
10/23/2024	Stephanie Morales	Analyst	Case Administration	Record and track undeliverable mail re: Distribution Checks	0.1
Subtotal 10/23/2024					1.6

Date	Employee Name	Role	Task	Description	Hours
10/24/2024	Micheal Hale	Senior Associate	Case Administration	Review bank data to identify cleared checks and reconcile account for ledger detail report	0.3
10/24/2024	Robert Saraceni	Director	Case Administration	Review and respond to D. Douglas email regarding investor W-9 and distribution payment split.	0.4
Subtotal 10/24/2024					0.7

Date	Employee Name	Role	Task	Description	Hours
10/25/2024	Micheal Hale	Senior Associate	Case Administration	Review bank data to identify cleared checks and reconcile account for ledger detail report	0.9
10/25/2024	Stephanie Morales	Analyst	Case Administration	Record and track undeliverable mail re: various mailings	0.1
10/25/2024	Stephanie Morales	Analyst	Case Administration	Capture and track undeliverable mail images	0.1
10/25/2024	Stephen Cady	Managing Director	Case Administration	Review distributions related communication and activity, and advise team re: same	0.2
Subtotal 10/25/2024					1.3

Date	Employee Name	Role	Task	Description	Hours
10/28/2024	Jenice Alduenda	Director	Case Administration	Review positive pay decisioning and notify bank for appropriate next steps	0.8
10/28/2024	Jenice Alduenda	Director	Case Administration	Approve check decisioning after review of check register and client communication	0.3
10/28/2024	Micheal Hale	Senior Associate	Case Administration	Review bank data to identify cleared checks and reconcile account for ledger detail report	0.8
10/28/2024	Morgan Wisbey	Director	Case Administration	Communication with J.Alduenda via Teams re: positive pay	0.4

Date	Employee Name	Role	Task	Description	Hours
10/28/2024	Morgan Wisbey	Director	Case Administration	Communication with R. Guevara via email re: positive pay	0.2
10/28/2024	Robert Saraceni	Director	Case Administration	Update Class 4a distribution lists.	1.3
10/28/2024	Stephanie Morales	Analyst	Case Administration	Record and track undeliverable mail re: various mailings	0.1
10/28/2024	Stephen Cady	Managing Director	Case Administration	Review distributions related communication and activity, and advise team re: same	0.5
Subtotal 10/28/2024					4.4

Date	Employee Name	Role	Task	Description	Hours
10/29/2024	Micheal Hale	Senior Associate	Case Administration	Review bank data to identify cleared checks and reconcile account for ledger detail report	0.8
10/29/2024	Morgan Wisbey	Director	Case Administration	Generate check images and send to client per D. Behrends	0.5
10/29/2024	Morgan Wisbey	Director	Case Administration	Generate ledger report per R. Saraceni	0.7
10/29/2024	Robert Saraceni	Director	Case Administration	Update Class 4 and 4a for additional cleared checks from 9.11.2024 and 10.17.2024 distributions; update for additional W-9's received; review and respond to inquiries	2.2
10/29/2024	Stephen Cady	Managing Director	Case Administration	Review distributions related communication and activity, and advise team re: same	0.4
Subtotal 10/29/2024					4.6

Date	Employee Name	Role	Task	Description	Hours
10/30/2024	Micheal Hale	Senior Associate	Case Administration	Review bank data to identify cleared checks and reconcile account for ledger detail report	0.5
10/30/2024	Morgan Wisbey	Director	Case Administration	Communication with D. Douglas via email re: check images	0.2
10/30/2024	Morgan Wisbey	Director	Case Administration	Resend check images per D. Douglas	0.2
10/30/2024	Robert Saraceni	Director	Case Administration	Update Class 4a second distribution for cleared checks.	0.2
10/30/2024	Robert Saraceni	Director	Case Administration	Review, research and respond to D. Behrends request for claim support.	0.1
10/30/2024	Robert Saraceni	Director	Case Administration	Update for additional W-9s received; update matrix files.	0.5
10/30/2024	Stephen Cady	Managing Director	Case Administration	Review distributions related communication and activity, and advise team re: same	0.2
Subtotal 10/30/2024					1.9

Date	Employee Name	Role	Task	Description	Hours
10/31/2024	Jason Bouzos	Senior Associate	Case Administration	Review positive pay to assist with future check clearing issues	0.4
10/31/2024	Micheal Hale	Senior Associate	Case Administration	Review bank data to identify cleared checks and reconcile account for ledger detail report	0.5
10/31/2024	Morgan Wisbey	Director	Case Administration	Coordinate stop check per R. Saraceni	0.5
10/31/2024	Morgan Wisbey	Director	Case Administration	Coordinate check production, including generation and quality control of check image	0.4
10/31/2024	Morgan Wisbey	Director	Case Administration	Research check status and provide check image per R. Saraceni	0.5

Date	Employee Name	Role	Task	Description	Hours
10/31/2024	Robert Saraceni	Director	Case Administration	Research and respond to D. Behrends' inquiry into Class 5 distribution check.	0.2
10/31/2024	Robert Saraceni	Director	Case Administration	Research and respond to inquiries on Class 4 and Class 5 check reissues.	0.5
10/31/2024	Robert Saraceni	Director	Case Administration	Update for additional W-9's received, address and name changes for beneficiaries	0.6
10/31/2024	Stephen Cady	Managing Director	Case Administration	Review distributions related communication and activity, and advise team re: same	0.5
Subtotal 10/31/2024					4.1
Total 10/01/2024 - 10/31/2024					95.8

**Noticing Detail**

Date of Service	Document(s) or Mailing Description	Number of Recipients	Method(s) of Service
10/2/2024	Heartland_W9 Letter 10.2.24	36	First Class Mail
10/2/2024	Distribution reissue checks	1	First Class Mail
10/3/2024	Heartland_W 9 Mailing 10.3.24	8	First Class Mail
10/8/2024	2024.10.08 Heartland Locke Lord Reissue	1	First Class Mail
10/17/2024	Heartland 2nd Distribution Class 4 2024.10.17	167	First Class Mail
10/17/2024	Heartland Locke Lord Class 4a 2nd Distribution	167	First Class Mail
10/21/2024	2024.10.21 Reissue (Donald Sprague)	1	First Class Mail
10/31/2024	W9 Mailing (USPS FORWARD)	1	First Class Mail



Case Name: Heartland

Summary of Expenses

Date Range: 10/01/2024 - 10/31/2024

Description	Quantity	Rate	Total	Total Charges
Large document binding and misc. noticing expenses - See Noticing Detail for additional information			\$422.50	\$422.50
			Total	\$422.50



410 Exchange, Ste 100
Irvine, CA 92602
855.812.6112

Invoice: 13350
Date: 12/15/2024
Due Date: 01/14/2025
Terms: Net 30

Bill To:
Heartland

Item	Quantity	Unit Price	Amount
November 2024 Invoice			
Hourly Fees			\$8,726.00
Printing	6	\$0.10	\$0.60
Postage			\$1.46
Envelopes and Packaging – See Noticing Summary for details			\$0.30
Expense Exhibit (See Attachment)			\$2.50

TOTAL DUE	\$8,730.86
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THANK YOU.

TOTAL ACCOUNT BALANCE DUE	\$25,877.82
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For wire/ACH payments:

Bank Name – Banc of California
Bank Address – 110 West A Street,
Suite 100, San Diego, CA 92101
Account No – 1000681781
ABA - 122238200
Beneficiary - Stretto

Remit Check Payments to:

Stretto Inc.
Attn: Accounts Receivable
410 Exchange, Ste. 100
Irvine, CA 92602



Case Name: Heartland

Summary of Hourly Fees

Date Range: 11/01/2024 - 11/30/2024

Role	Hours	Rate	Total
Analyst II	0.7	\$40.00	\$28.00
Analyst III	0.2	\$50.00	\$10.00
Associate I	0.8	\$65.00	\$52.00
Associate III	0.2	\$130.00	\$26.00
Director	13.2	\$185.00	\$2,442.00
Managing Director	0.8	\$210.00	\$168.00
Specialized Director	3.4	\$345.00	\$1,173.00
Specialized Managing Director	2.1	\$395.00	\$829.50
Specialized Senior Associate	12.3	\$325.00	\$3,997.50
		Total	\$8,726.00



Case Name: Heartland

Time Detail

Date Range: 11/01/2024 - 11/30/2024

Date	Employee Name	Role	Task	Description	Hours
11/01/2024	Micheal Hale	Specialized Senior Associate	Case Administration	Review bank data to identify cleared checks and reconcile account for ledger detail report	0.7
11/01/2024	Robert Saraceni	Director	Case Administration	Upload W-9s into Box.	0.2
11/01/2024	Stephanie Morales	Analyst	Case Administration	Record and track undeliverable mail re: various mailings	0.1
11/01/2024	Stephanie Morales	Analyst	Case Administration	Capture and track undeliverable mail images	0.1
11/01/2024	Stephen Cady	Specialized Managing Director	Case Administration	Review distributions related communication and activity, and advise team re: same	0.2
Subtotal 11/01/2024					1.3
Date	Employee Name	Role	Task	Description	Hours
11/03/2024	Robert Saraceni	Director	Case Administration	Review correspondence from investor requesting details surrounding their distribution and asserting a different initial investment amount. Research and provide results to Dykema for response.	0.3
Subtotal 11/03/2024					0.3
Date	Employee Name	Role	Task	Description	Hours
11/04/2024	Micheal Hale	Specialized Senior Associate	Case Administration	Review bank data to identify cleared checks and reconcile account for ledger detail report	0.8
11/04/2024	Morgan Wisbey	Specialized Director	Case Administration	Communication with D. Douglas via phone re: check clearing status	0.2
11/04/2024	Morgan Wisbey	Specialized Director	Case Administration	Communication with D. Douglas via email re: check clearing status	0.4
11/04/2024	Robert Saraceni	Director	Case Administration	Research and provide all distribution and investment information on select investor requested D. Douglas	0.4
11/04/2024	Stephen Cady	Specialized Managing Director	Case Administration	Review distributions related communication and activity, and advise team re: same	0.3
Subtotal 11/04/2024					2.1
Date	Employee Name	Role	Task	Description	Hours
11/05/2024	Micheal Hale	Specialized Senior Associate	Case Administration	Review bank data to identify cleared checks and reconcile account for ledger detail report	0.3

Date	Employee Name	Role	Task	Description	Hours
11/05/2024	Staphany Alcantar	Analyst	Case Administration	Case file case related documents	0.3
Subtotal 11/05/2024					0.6
Date	Employee Name	Role	Task	Description	Hours
11/06/2024	Robert Saraceni	Director	Case Administration	Review correspondence with additional W-9 forms to be added, update Class 4 and 4a distribution spreadsheets and add W-9 forms to Box environment	0.3
11/06/2024	Robert Saraceni	Director	Case Administration	Review correspondence from D. Douglas and M. Wisbey regarding status of select investor distribution and data previously answered.	0.1
Subtotal 11/06/2024					0.4
Date	Employee Name	Role	Task	Description	Hours
11/07/2024	Micheal Hale	Specialized Senior Associate	Case Administration	Review bank data to identify cleared checks and reconcile account for ledger detail report	0.6
Subtotal 11/07/2024					0.6
Date	Employee Name	Role	Task	Description	Hours
11/08/2024	Micheal Hale	Specialized Senior Associate	Case Administration	Review bank data to identify cleared checks and reconcile account for ledger detail report	1.2
11/08/2024	Morgan Wisbey	Specialized Director	Case Administration	Generate wire images per D. Douglas	0.4
11/08/2024	Morgan Wisbey	Specialized Director	Case Administration	Communication with D. Douglas via email re: check images	0.2
11/08/2024	Robert Saraceni	Director	Case Administration	Review and respond to D. Douglas' inquiry concerning W-9 protocol for joint investments	0.1
11/08/2024	Robert Saraceni	Director	Case Administration	Corr. to D. Douglas on joint investor name and address as provided to Stretto by the Receiver and A&C.	0.2
11/08/2024	Stephanie Morales	Analyst	Case Administration	Record and track undeliverable mail re: Distribution Checks	0.1
11/08/2024	Stephen Cady	Specialized Managing Director	Case Administration	Review distributions related communication and activity, and advise team re: same	0.4
Subtotal 11/08/2024					2.6
Date	Employee Name	Role	Task	Description	Hours
11/11/2024	Micheal Hale	Specialized Senior Associate	Case Administration	Review bank data to identify cleared checks and reconcile account for ledger detail report	0.4
Subtotal 11/11/2024					0.4
Date	Employee Name	Role	Task	Description	Hours
11/12/2024	Laura Tondreault	Analyst	Case Administration	Prepare and organize general case documents for accuracy and completeness	0.1
Subtotal 11/12/2024					0.1
Date	Employee Name	Role	Task	Description	Hours
11/13/2024	Micheal Hale	Specialized Senior Associate	Case Administration	Review bank data to identify cleared checks and reconcile account for ledger detail report	0.3

Date	Employee Name	Role	Task	Description	Hours
11/13/2024	Robert Saraceni	Director	Case Administration	Review and respond to Receiver's emails regarding stale date procedures	0.4
11/13/2024	Robert Saraceni	Director	Case Administration	Review, research and respond to D. Douglas inquiry into reissuance of missing check	0.3
Subtotal 11/13/2024					1.0

Date	Employee Name	Role	Task	Description	Hours
11/14/2024	Dan McElhinney	Managing Director	Case Administration	Prep for and attend fee hearing (.8)	0.8
11/14/2024	Jenice Alduenda	Specialized Director	Case Administration	review check language needed and provide direction to the team	0.1
11/14/2024	Micheal Hale	Specialized Senior Associate	Case Administration	Review check images for quality control and fraud mitigations	0.3
11/14/2024	Micheal Hale	Specialized Senior Associate	Case Administration	Review bank data to identify cleared checks and reconcile account for ledger detail report	0.5
11/14/2024	Micheal Hale	Specialized Senior Associate	Case Administration	Coordinate check production, including import of data into case management system, generation and quality control of check image	1.2
11/14/2024	Morgan Wisbey	Specialized Director	Case Administration	Generate ledger detail report per R. Saraceni	0.4
11/14/2024	Morgan Wisbey	Specialized Director	Case Administration	Communication with R. Saraceni via email re: stop payment process	0.2
11/14/2024	Morgan Wisbey	Specialized Director	Case Administration	Communication with R. Saraceni via email re: status of checks	0.4
11/14/2024	Robert Saraceni	Director	Case Administration	Exchange corr. with Receiver and M. Wisbey regarding 9.11.2024 distribution and uncashed distribution checks; Review and respond to D. Behrends inquiry into stale date timing; Follow up with M. Wisbey on missing check status; Review and reconcile current check registers for Class 4; Class 4a and Class 5; Follow up with M. Wisbey as to status of remaining reissued Class 5 check; Begin review of check register for all Class 4 uncashed checks for 9.11.2024 distribution	2.8
11/14/2024	Ruben Guevara	Specialized Senior Associate	Case Administration	Review check images for quality control and fraud mitigations	0.3
Subtotal 11/14/2024					7.0

Date	Employee Name	Role	Task	Description	Hours
11/15/2024	Aimee Marshall	Associate	Case Administration	Generate service of Heartland Operator's Montgomery Reissue 2024.11.15 mailing including printing and fulfillment	0.1
11/15/2024	Aimee Marshall	Associate	Case Administration	Generate service of Heartland Locke Lorde Fisher Reissue 2024.11.15 mailing including printing and fulfillment	0.1
11/15/2024	Jenice Alduenda	Specialized Director	Case Administration	Review check images for quality control and fraud mitigations	0.2
11/15/2024	Micheal Hale	Specialized Senior Associate	Case Administration	Coordinate check production, including import of data into case management system, generation and quality control of check images, and submission of print request	1.1
11/15/2024	Micheal Hale	Specialized Senior Associate	Case Administration	Review bank data to identify cleared checks and reconcile account for ledger detail report	0.8
11/15/2024	Ricky Quang	Associate	Case Administration	Generate service of Heartland Locke Lorde Fisher Reissue 2024.11.15 mailing including printing and fulfillment	0.3

Date	Employee Name	Role	Task	Description	Hours
11/15/2024	Ricky Quang	Associate	Case Administration	Generate service of Heartland Operator's Montgomery Reissue 2024.11.15 mailing including printing and fulfillment	0.3
11/15/2024	Robert Saraceni	Director	Case Administration	Complete check register review for Class 4 and Class 4a outstanding checks and prepare analysis for client; research all W-9 information for investors and confirm address information is correct; draft corr. to client detailing results of analysis	2.8
11/15/2024	Robert Saraceni	Director	Case Administration	Reconcile Class 5 distribution account, follow up on reissue of one claimant distribution check, draft corr. to D. Behrends re status	0.5
11/15/2024	Ruben Guevara	Specialized Senior Associate	Case Administration	Review check images for quality control and fraud mitigations	0.2
11/15/2024	Stephen Cady	Specialized Managing Director	Case Administration	Review distributions related communication and activity, and advise team re: same	0.5
Subtotal 11/15/2024					6.9

Date	Employee Name	Role	Task	Description	Hours
11/18/2024	Jason Bouzos	Specialized Senior Associate	Case Administration	Provide details of previous check distribution	0.3
11/18/2024	Robert Saraceni	Director	Case Administration	Review, coordinate and follow up on Class 4 reissue	0.2
11/18/2024	Robert Saraceni	Director	Case Administration	Update Class 4a Distribution detail for reissued check	0.1
Subtotal 11/18/2024					0.6

Date	Employee Name	Role	Task	Description	Hours
11/19/2024	Jenice Alduenda	Specialized Director	Case Administration	Review positive pay and approve through online banking	0.2
11/19/2024	Laura Tondreault	Analyst	Case Administration	Prepare and organize general case documents for accuracy and completeness	0.1
11/19/2024	Micheal Hale	Specialized Senior Associate	Case Administration	Review bank data to identify cleared checks and reconcile account for ledger detail report	0.4
Subtotal 11/19/2024					0.7

Date	Employee Name	Role	Task	Description	Hours
11/20/2024	Micheal Hale	Specialized Senior Associate	Case Administration	Review bank data to identify cleared checks and reconcile account for ledger detail report	0.2
11/20/2024	Naomi Rodriguez	Associate	Case Administration	Administrative review of mailing details	0.2
Subtotal 11/20/2024					0.4

Date	Employee Name	Role	Task	Description	Hours
11/21/2024	Micheal Hale	Specialized Senior Associate	Case Administration	Review bank data to identify cleared checks and reconcile account for ledger detail report	0.2
11/21/2024	Morgan Wisbey	Specialized Director	Case Administration	Generate check register per R. Saraceni	0.5

Date	Employee Name	Role	Task	Description	Hours
11/21/2024	Ruben Guevara	Specialized Senior Associate	Case Administration	Generate ledger detail report	0.1
11/21/2024	Stephen Cady	Specialized Managing Director	Case Administration	Review distributions related communication and activity, and advise team re: same	0.2
Subtotal 11/21/2024					1.0

Date	Employee Name	Role	Task	Description	Hours
11/22/2024	Micheal Hale	Specialized Senior Associate	Case Administration	Review bank data to identify cleared checks and reconcile account for ledger detail report	0.7
11/22/2024	Stephen Cady	Specialized Managing Director	Case Administration	Review distributions related communication and activity, and advise team re: same	0.2
Subtotal 11/22/2024					0.9

Date	Employee Name	Role	Task	Description	Hours
11/25/2024	Micheal Hale	Specialized Senior Associate	Case Administration	Review bank data to identify cleared checks and reconcile account for ledger detail report	0.5
11/25/2024	Robert Saraceni	Director	Case Administration	Reconcile Class 4 and Class 4a distributions to current check register	3.2
Subtotal 11/25/2024					3.7

Date	Employee Name	Role	Task	Description	Hours
11/26/2024	Micheal Hale	Specialized Senior Associate	Case Administration	Review bank data to identify cleared checks and reconcile account for ledger detail report	0.2
11/26/2024	Robert Saraceni	Director	Case Administration	Review and respond to D. Douglas email regarding W-9s for beneficiaries of an investor who received their entire investment back plus interest.	0.2
11/26/2024	Robert Saraceni	Director	Case Administration	Prepare updated outstanding check analysis for 9.11.2024 distribution	0.5
Subtotal 11/26/2024					0.9

Date	Employee Name	Role	Task	Description	Hours
11/27/2024	Jenice Alduenda	Specialized Director	Case Administration	Review check images for quality control and fraud mitigations	0.2
11/27/2024	Micheal Hale	Specialized Senior Associate	Case Administration	Review bank data to identify cleared checks and reconcile account for ledger detail report	1.0
11/27/2024	Robert Saraceni	Director	Case Administration	Update distribution for W-9's received, perform address updates	0.6
11/27/2024	Stephanie Morales	Analyst	Case Administration	Record and track undeliverable mail re: various mailings	0.1
11/27/2024	Stephen Cady	Specialized Managing Director	Case Administration	Review distributions related communication and activity, and advise team re: same	0.3
Subtotal 11/27/2024					2.2

Total 11/01/2024 - 11/30/2024 33.7



Case Name: Heartland

Summary of Expenses

Date Range: 11/01/2024 - 11/30/2024

Description	Quantity	Rate	Total	Total Charges
Large document binding and misc. noticing expenses - See Noticing Detail for additional information			\$2.50	\$2.50
			Total	\$2.50



Noticing Detail

Date of Service	Document(s) or Mailing Description	Number of Recipients	Method(s) of Service
11/15/2024	Heartland Operator's Montgomery Reissue 2024.11.15	1	First Class Mail
11/15/2024	Heartland Locke Lorde Fisher Reissue 2024.11.15	1	First Class Mail



410 Exchange, Ste 100
Irvine, CA 92602
855.812.6112

Invoice: 13642
Date: 01/15/2025
Due Date: 02/14/2025
Terms: Net 30

Bill To:
Heartland

Item	Quantity	Unit Price	Amount
December 2024 Invoice			
Hourly Fees			\$13,572.00
Printing	136	\$0.10	\$13.60
Postage			\$32.12
Envelopes and Packaging – See Noticing Summary for details			\$6.60
Expense Exhibit (See Attachment)			\$55.00

TOTAL DUE	\$13,679.32
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THANK YOU.

TOTAL ACCOUNT BALANCE DUE	\$39,557.14
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For wire/ACH payments:

Bank Name – Banc of California
Bank Address – 110 West A Street,
Suite 100, San Diego, CA 92101
Account No – 1000681781
ABA - 122238200
Beneficiary - Stretto

Remit Check Payments to:

Stretto Inc.
Attn: Accounts Receivable
410 Exchange, Ste. 100
Irvine, CA 92602



Case Name: Heartland

Summary of Hourly Fees

Date Range: 12/01/2024 - 12/31/2024

Role	Hours	Rate	Total
Analyst	1.2	\$50.00	\$60.00
Associate I	0.3	\$65.00	\$19.50
Associate III	0.9	\$130.00	\$117.00
Director	23.8	\$195.00	\$4,641.00
Specialized Director	9.2	\$345.00	\$3,174.00
Specialized Managing Director	1.9	\$395.00	\$750.50
Specialized Senior Associate	14.8	\$325.00	\$4,810.00
		Total	\$13,572.00



Case Name: Heartland

Time Detail

Date Range: 12/01/2024 - 12/31/2024

Date	Employee Name	Role	Task	Description	Hours
12/02/2024	Aimee Marshall	Associate	Case Administration	Generate service of 2024.12.02 Heartland Re-Issue mailing including printing and fulfillment	0.2
12/02/2024	Jason Bouzos	Specialized Senior Associate	Case Administration	Coordinate check production, including import of data into case management system, generation and quality control of check images, and submission of print request	0.8
12/02/2024	Jenice Alduenda	Specialized Director	Case Administration	Check on the status of weekly reporting	0.1
12/02/2024	Ruben Guevara	Specialized Senior Associate	Case Administration	Review check images for quality control and fraud mitigations	0.1
Subtotal 12/02/2024					1.2
Date	Employee Name	Role	Task	Description	Hours
12/03/2024	Jason Bouzos	Specialized Senior Associate	Case Administration	Process positive pay upload	0.4
12/03/2024	Jason Bouzos	Specialized Senior Associate	Case Administration	Prepare and provide updated check register	0.4
12/03/2024	Jenice Alduenda	Specialized Director	Case Administration	Approve positive pay entry in online banking	0.2
12/03/2024	Jenice Alduenda	Specialized Director	Case Administration	Approve positive pay entry for check reissue	0.2
12/03/2024	Micheal Hale	Specialized Senior Associate	Case Administration	Review bank data to identify cleared checks and reconcile account for ledger detail report	0.7
12/03/2024	Naomi Rodriguez	Associate	Case Administration	Administrative review of mailing details	0.1
12/03/2024	Robert Saraceni	Director	Case Administration	Update distribution master files for additional cleared checks through 11.27.2024 and prepare updated reports to circulate to Receiver and Ahuja & Consultants, Inc.as requested.	1.4
12/03/2024	Stephen Cady	Specialized Managing Director	Case Administration	Review distributions related communication and activity, and advise team re: same	0.4
Subtotal 12/03/2024					3.8
Date	Employee Name	Role	Task	Description	Hours
12/04/2024	Jenice Alduenda	Specialized Director	Case Administration	Reach out to Western Alliance regarding account stop payment notices	0.1
12/04/2024	Jenice Alduenda	Specialized Director	Case Administration	Confirm check register received weekly as requested	0.1

Date	Employee Name	Role	Task	Description	Hours
12/04/2024	Micheal Hale	Specialized Senior Associate	Case Administration	Review bank data to identify cleared checks and reconcile account for ledger detail report	0.8
12/04/2024	Robert Saraceni	Director	Case Administration	Review correspondence from D. Douglas requesting access to Box Claim folder. forward request to K. Wasserman and respond.	0.2
12/04/2024	Robert Saraceni	Director	Case Administration	Review and respond to M. Hale correspondence regarding update check register. Begin review and reformatting of register	0.4
12/04/2024	Stephen Cady	Specialized Managing Director	Case Administration	Review distributions related communication and activity, and advise team re: same	0.2
Subtotal 12/04/2024					1.8

Date	Employee Name	Role	Task	Description	Hours
12/05/2024	Micheal Hale	Specialized Senior Associate	Case Administration	Review bank data to identify cleared checks and reconcile account for ledger detail report	0.2
12/05/2024	Robert Saraceni	Director	Case Administration	Complete review and reformat current distribution check register, update class 4, Class 4a and Class 5 distribution records for additional cleared checks and prepare distribution reports by class, forward to Dykema and A&C.	3.5
Subtotal 12/05/2024					3.7

Date	Employee Name	Role	Task	Description	Hours
12/06/2024	Jenice Alduenda	Specialized Director	Case Administration	Review check discrepancy matter and follow up with the client on the resolution	0.9
12/06/2024	Jenice Alduenda	Specialized Director	Case Administration	Communicate with the client on a payee distribution	0.6
12/06/2024	Laura Tondreault	Analyst	Case Administration	Prepare and organize general case documents for accuracy and completeness	1.0
12/06/2024	Micheal Hale	Specialized Senior Associate	Case Administration	Review bank data to identify cleared checks and reconcile account for ledger detail report	0.6
12/06/2024	Morgan Wisbey	Specialized Director	Case Administration	Communication with D. Behrends via email re: distribution check issue	0.2
12/06/2024	Morgan Wisbey	Specialized Director	Case Administration	Communication with J. Alduena via email re: distribution check issue	0.2
12/06/2024	Morgan Wisbey	Specialized Director	Case Administration	Communication with R. Saraceni via email re: distribution check issue	0.2
12/06/2024	Morgan Wisbey	Specialized Director	Case Administration	Communication with Western Alliance Bank via email re: distribution check issue	0.2
12/06/2024	Robert Saraceni	Director	Case Administration	Review and respond to additional inquiries from Receiver's office on disbursement check issue and forward to M. Wisbey for further research and response	0.2
Subtotal 12/06/2024					4.1

Date	Employee Name	Role	Task	Description	Hours
12/09/2024	Jenice Alduenda	Specialized Director	Case Administration	Connect with bank and research with leadership team the deposit matter for payee Brenda Tapley	0.8
12/09/2024	Jenice Alduenda	Specialized Director	Case Administration	Connect with client regarding check distribution inquiry	0.4
12/09/2024	Jenice Alduenda	Specialized Director	Case Administration	Follow up with D. Douglas via phone with additional payee inquiry	0.1

Date	Employee Name	Role	Task	Description	Hours
12/09/2024	Micheal Hale	Specialized Senior Associate	Case Administration	Review bank data to identify cleared checks and reconcile account for ledger detail report	0.3
12/09/2024	Robert Saraceni	Director	Case Administration	Prepare and forward non-negotiated disbursement check analysis from first distribution and forward to Receiver	1.4
12/09/2024	Stephen Cady	Specialized Managing Director	Case Administration	Review distributions related communication and activity, and advise team re: same	0.3
Subtotal 12/09/2024					3.3

Date	Employee Name	Role	Task	Description	Hours
12/10/2024	Micheal Hale	Specialized Senior Associate	Case Administration	Review bank data to identify cleared checks and reconcile account for ledger detail report	0.2
Subtotal 12/10/2024					0.2

Date	Employee Name	Role	Task	Description	Hours
12/11/2024	Jason Bouzos	Specialized Senior Associate	Case Administration	Complete account reconciliation	0.5
12/11/2024	Morgan Wisbey	Specialized Director	Case Administration	Generate updated check register per R. Saraceni	1.0
12/11/2024	Robert Saraceni	Director	Case Administration	Review inquiry from D. Douglas regarding outstanding checks form 9.11.2024 and 10.17.2024 distributions, research, and respond with opinion on handling reissue of checks as well as research on number of new checks to be issued on investors recently filing W-9s.	0.5
12/11/2024	Robert Saraceni	Director	Case Administration	Exchange correspondence with D. Douglas of Dykema and M. Wisbey regarding current status of distributions and check register	0.1
12/11/2024	Robert Saraceni	Director	Case Administration	Create updated distribution master file and prepare Release 3 distribution file	0.7
12/11/2024	Robert Saraceni	Director	Case Administration	Review and update current check register and create current outstanding list for 9.11.2024	0.5
Subtotal 12/11/2024					3.3

Date	Employee Name	Role	Task	Description	Hours
12/12/2024	Micheal Hale	Specialized Senior Associate	Case Administration	Review bank data to identify cleared checks and reconcile account for ledger detail report	0.3
12/12/2024	Robert Saraceni	Director	Case Administration	Prepare analysis and report of remaining outstanding checks from initial distribution and forward to Receiver, prepare report of new investors eligible for distribution and remaining investors not eligible for distribution and forward to Receiver, begin preparation of report of outstanding checks from second distribution (10.17.2024).	2.9
12/12/2024	Robert Saraceni	Director	Case Administration	Prep for and attend meeting with Receiver regarding outstanding check issues.	0.5
12/12/2024	Robert Saraceni	Director	Case Administration	Review DE. Douglas corr. regarding check reissues, update distribution spreadsheet in advance of 12.19.2024 check reissue	0.3
Subtotal 12/12/2024					4.0

Date	Employee Name	Role	Task	Description	Hours
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Date	Employee Name	Role	Task	Description	Hours
12/13/2024	Micheal Hale	Specialized Senior Associate	Case Administration	Review bank data to identify cleared checks and reconcile account for ledger detail report	0.2
12/13/2024	Robert Saraceni	Director	Case Administration	Complete preparation of Class 4 and 4a outstanding check analysis from 10.17.2024 second distribution and draft corr. to Receiver	1.9
Subtotal 12/13/2024					2.1

Date	Employee Name	Role	Task	Description	Hours
12/16/2024	Micheal Hale	Specialized Senior Associate	Case Administration	Review bank data to identify cleared checks and reconcile account for ledger detail report	0.1
Subtotal 12/16/2024					0.1

Date	Employee Name	Role	Task	Description	Hours
12/17/2024	Micheal Hale	Specialized Senior Associate	Case Administration	Review bank data to identify cleared checks and reconcile account for ledger detail report	0.2
12/17/2024	Morgan Wisbey	Specialized Director	Case Administration	Close distribution account per D. Behrends	0.4
12/17/2024	Robert Saraceni	Director	Case Administration	Prepare preliminary third distribution files for Class 4 and Class 4a investors	0.6
Subtotal 12/17/2024					1.2

Date	Employee Name	Role	Task	Description	Hours
12/18/2024	Micheal Hale	Specialized Senior Associate	Case Administration	Review bank data to identify cleared checks and reconcile account for ledger detail report	1.0
Subtotal 12/18/2024					1.0

Date	Employee Name	Role	Task	Description	Hours
12/19/2024	Robert Saraceni	Director	Case Administration	Review and format 12.18.2024 check register, prepare third distribution files and update outstanding check reports for 9.11.2024 distribution. Draft corr. to Receiver.	2.0
Subtotal 12/19/2024					2.0

Date	Employee Name	Role	Task	Description	Hours
12/20/2024	Laura Tondreault	Analyst	Case Administration	Prepare and organize general case documents for accuracy and completeness	0.1
12/20/2024	Morgan Wisbey	Specialized Director	Case Administration	Coordinate check production, including import of data into case management system	0.7
12/20/2024	Robert Saraceni	Director	Case Administration	Review Class 4 and Class 4a third distribution files and prepare corr. for distribution request, review and reconcile outstanding checks and prepare Class 4 and Class 4a void check and reissue lists.	5.1
12/20/2024	Ruben Guevara	Specialized Senior Associate	Case Administration	Intake request for check disbursement	0.2
Subtotal 12/20/2024					6.1

Date	Employee Name	Role	Task	Description	Hours
12/23/2024	Micheal Hale	Specialized Senior Associate	Case Administration	Review bank data to identify cleared checks and reconcile account for ledger detail report	0.3

Date	Employee Name	Role	Task	Description	Hours
12/23/2024	Micheal Hale	Specialized Senior Associate	Case Administration	Review request and create distribution request form	0.9
12/23/2024	Morgan Wisbey	Specialized Director	Case Administration	Generate and coordinate execution distribution request form	0.5
12/23/2024	Robert Saraceni	Director	Case Administration	Follow up with M. Wisbey on status of reissues.	0.1
12/23/2024	Robert Saraceni	Director	Case Administration	Review and respond to D. Douglas inquiry into distribution and reissue status	0.1
12/23/2024	Robert Saraceni	Director	Case Administration	Review and respond to distribution correspondence from. J. Alduenda.	0.1
12/23/2024	Stephen Cady	Specialized Managing Director	Case Administration	Review distributions related communication and activity, and advise team re: same	0.4

Subtotal 12/23/2024 2.4

Date	Employee Name	Role	Task	Description	Hours
12/24/2024	Morgan Wisbey	Specialized Director	Case Administration	Coordinate check production including import of data into case management system	0.5

Subtotal 12/24/2024 0.5

Date	Employee Name	Role	Task	Description	Hours
12/26/2024	Micheal Hale	Specialized Senior Associate	Case Administration	Communication with D. Williamson via email and phone re: verbal verification of wire request instructions	0.2
12/26/2024	Micheal Hale	Specialized Senior Associate	Case Administration	Coordinate check production, including import of data into case management system, generation and quality control of check images, and submission of print request	0.1
12/26/2024	Micheal Hale	Specialized Senior Associate	Case Administration	Review stop and reissue requests	0.7
12/26/2024	Morgan Wisbey	Specialized Director	Case Administration	Communication with D. Williamson via email re: distribution request forms	0.4
12/26/2024	Morgan Wisbey	Specialized Director	Case Administration	Follow-up on distribution request form	0.2
12/26/2024	Robert Saraceni	Director	Case Administration	Review third distribution files provided by M. Wisbey and provide comment, prepare updated cover letter and forward to M. Wisbey.	0.5

Subtotal 12/26/2024 2.1

Date	Employee Name	Role	Task	Description	Hours
12/27/2024	Aimee Marshall	Associate	Case Administration	Generate service of Heartland Distribution Class 4 2024.12.27 mailing including printing and fulfillment	0.2
12/27/2024	Aimee Marshall	Associate	Case Administration	Generate service of Heartland Check Distribution 4a Locke Lorde 2024.12.27 mailing including printing and fulfillment	0.2
12/27/2024	Aimee Marshall	Associate	Case Administration	Generate service of Heartland Check Reissues 2024.12.27 mailing including printing and fulfillment	0.2
12/27/2024	Jason Bouzos	Specialized Senior Associate	Case Administration	Review wires for quality control and fraud mitigations	0.5
12/27/2024	Jenice Alduenda	Specialized Director	Case Administration	Review check images for quality control and fraud mitigations	0.8

Date	Employee Name	Role	Task	Description	Hours
12/27/2024	Micheal Hale	Specialized Senior Associate	Case Administration	Coordinate check production for new and reissue checks, including import of data into case management system, generation and quality control of check images, and submission of print request	3.0
12/27/2024	Micheal Hale	Specialized Senior Associate	Case Administration	Review bank data to identify cleared checks and reconcile account for ledger detail report	0.9
12/27/2024	Morgan Wisbey	Specialized Director	Case Administration	Account maintenance	0.2
Subtotal 12/27/2024					6.0

Date	Employee Name	Role	Task	Description	Hours
12/30/2024	Charles Wheeler	Associate	Case Administration	Administrative review of mailing details	0.1
12/30/2024	Laura Tondreault	Analyst	Case Administration	Prepare and organize general case documents for accuracy and completeness	0.1
12/30/2024	Micheal Hale	Specialized Senior Associate	Case Administration	Communication with D. Douglas via email re: confirmation of distribution	0.1
12/30/2024	Micheal Hale	Specialized Senior Associate	Case Administration	Upload checks to positive pay in bank portal	0.8
12/30/2024	Micheal Hale	Specialized Senior Associate	Case Administration	Review bank data to identify cleared checks and reconcile account for ledger detail report	0.1
12/30/2024	Morgan Wisbey	Specialized Director	Case Administration	Communication with D. Douglas via email re: confirm reissue check mailing	0.2
12/30/2024	Naomi Rodriguez	Associate	Case Administration	Administrative review of mailing details	0.2
12/30/2024	Robert Saraceni	Director	Case Administration	Reconcile check register for 12.27.2024 third distribution and void and reissue.	0.6
12/30/2024	Robert Saraceni	Director	Case Administration	Review and respond to D. Douglas inquiry	0.2
12/30/2024	Ruben Guevara	Specialized Senior Associate	Case Administration	Review distribution request and format data for check production	0.1
12/30/2024	Stephen Cady	Specialized Managing Director	Case Administration	Review distributions related communication and activity, and advise team re: same	0.6
Subtotal 12/30/2024					3.1

Date	Employee Name	Role	Task	Description	Hours
12/31/2024	Micheal Hale	Specialized Senior Associate	Case Administration	Review bank data to identify cleared checks and reconcile account for ledger detail report	0.1
Subtotal 12/31/2024					0.1

Total 12/01/2024 - 12/31/2024 52.1



Case Name: Heartland

Summary of Expenses

Date Range: 12/01/2024 - 12/31/2024

Description	Quantity	Rate	Total	Total Charges
Large document binding and misc. noticing expenses - See Noticing Detail for additional information			\$55.00	\$55.00
			Total	\$55.00



Noticing Detail

Date of Service	Document(s) or Mailing Description	Number of Recipients	Method(s) of Service
12/2/2024	2024.12.02 Heartland Re-Issue	1	First Class Mail
12/27/2024	Heartland Check Distribution 4a Locke Lorde 2024.12.27	11	First Class Mail
12/27/2024	Heartland Distribution Class 4 2024.12.27	11	First Class Mail
12/27/2024	Heartland Check Reissues 2024.12.27	21	First Class Mail

EXHIBIT F-1

Deborah D. Williamson

Member



Contact

San Antonio
210-554-5275
dwilliamson@dykema.com

Overview

For more than 30 years, clients have turned to Deborah Williamson for leadership and advice on bankruptcy and restructuring matters. Deborah is a national leader in bankruptcy law, and she leverages her experience and insight to advise clients across industries on counterparty risk, bankruptcy litigation, and asset acquisition.

Deborah is widely recognized as one of the top bankruptcy lawyers in the United States and one of the top lawyers—period—in Texas. She was selected to serve on the American Bankruptcy Institute (ABI) Bankruptcy Reform Commission, received lifetime achievement awards from both ABI and *The San Antonio Business Journal*, and is recognized in legal publications such as *Chambers USA: America's Leading Lawyers for Business*, *The Best Lawyers in America*, and *Super Lawyers*.

In 2016, Deborah authored the second edition of *When Gushers Go Dry, The Essentials of Oil & Gas Bankruptcy* to address new realities in the oil fields, the first guide to oil and gas bankruptcy. She had previously co-authored the first edition of *Bankruptcy Litigation for the Commercial Litigator*.

Deborah has been named a leader in her field by Chambers US A since 2003 and clients recognize her as the “go to” practitioner in the insolvency and restructuring space. She was listed by Texas Super Lawyers among the “Top 100 Lawyers in Texas,” the “Top 50 Women Lawyers in Texas,” and the “Top 50 Lawyers in Central Texas” since that honor’s inception. She has also been included in The Best Lawyers in America® for more than 20 years.

She has served as co-chair of the Bankruptcy and Insolvency Litigation Committee of the Litigation Section of the American Bar Association and chair of the SBOT Bankruptcy Law Section.

Areas of client focus

Practices

Government Reorganization and Restructuring
Restructuring and Bankruptcy

Industries

Energy and Natural Resources
Financial Services
Loan Workouts, Restructuring, and Bankruptcy
Oil and Gas

Experience

Receivership

***In re Heartland Group Ventures, LLC*, Case No. 4-21CV-1310-0-BP, Northern District of Texas, Fort Worth Division**

Appointed to serve as Receiver in an action brought by the SEC against Heartland Group Ventures and a number of related entities in connection with five fraudulent, unregistered oil and gas offerings.

Litigation

***TXCO Resources Inc. v Peregrine Petroleum, LLC*, Adversary Case No. 09-05125-rbk, Western District of Texas, San Antonio Division**

Trial counsel to post confirmation TXCO Resources, Inc., a publicly traded exploration and production (E&P) company in successful prosecution of trade secret misappropriation claims against Peregrine Petroleum, LLC. Following a 41-day trial, the Court awarded judgment in favor of RTXCO (Reorganized through Chapter 11) on its claims for misappropriation of trade secrets and entered a multimillion dollar damage award.

***In re The Heritage Organization*, Case No. 04-35574, Northern District of Texas, Dallas Division**

Dykema is special litigation counsel to the chapter 11 trustee, Dennis Faulkner, in this adversary proceeding. The trustee retained us to prosecute avoidance actions, fraud actions and various D&O actions against the former officers and professionals who worked for The Heritage Organization. In January 2009, Deborah was co-counsel in a two-week trial which ultimately resulted in a Judgment in favor of the Trustee for \$61 million. *Faulkner v. Kornman (In re Heritage Org. L.L.C.)*, 413 B.R. 438 (Bankr. N.D. Tex. 2009)

Bankruptcy and Restructuring — Energy

***In re TXCO Resources Inc.*, Case No. 09-51807, Western District of Texas, San Antonio Division**

Lead counsel to an exploration and production company who were Debtors in jointly administered chapter 11 bankruptcy case. Dykema began to assist TXCO's management in negotiations with their lenders beginning in March 2009. Once a commitment for post-petition financing was obtained in an amount sufficient to avoid the need for immediate liquidation, Chapter 11 was filed on May 17, 2009. Dykema played an instrumental role throughout the bankruptcy case, including obtaining approval of the \$32,000,000 in debtor-in-possession financing over numerous objections, putting in place a sale process, introducing potential purchasers, and ultimately negotiating the terms of a sale for approximately \$310,000,000 of significantly all of the assets of debtors, which provided for the payment in full of the creditors' claims with interest and a multi-million dollar return to equity.

***In re Flying J Inc., et al.*, Case No. 08-13384 (MFW), District of Delaware**

Counsel to a member of the Official Committee of Unsecured Creditors.

***In re Aloha Airlines, Inc.*, Case No. 08-00337, District of Hawaii, Honolulu Division**

We represented a multi-national maintenance, repair and overhaul company in connection with its claims against Aloha Airlines.

In re Lion Star Nacogdoches Hospital, LLC, Case No. 23-43535-mxm11, Northern District of Texas, Fort Worth Division

We represent a hospital district in the Chapter 11 bankruptcy of the lessee/operator of a hospital owned by the District.

In re Fort Worth Osteopathic Hospital, Inc., dba Osteopathic Medical Center of Texas, Case No. 05-41513, Northern District of Texas, Fort Worth Division

We represented MBIA Insurance Corporation (“MBIA”) in connection with the default, foreclosure and chapter 7 bankruptcy of the last osteopathic hospital in the state of Texas. MBIA was the insurer of over \$70,000,000 in unsecured bond obligations. This case involved issues related to the bankruptcy of a not-for-profit corporation and related for-profit affiliates, some of whom were co-debtors. Other issues included potential liability of former officers, directors and advisors to the not-for-profit corporations and analysis of potential claims, and defense of a third party claim brought against MBIA ultimately resulting in a dismissal of the claims against MBIA.

Bankruptcy and Restructuring — Retail

In re Hardwood P-G, Inc., Custom Forest Products, Ltd., and Customer Forest Transportation, Inc., Case No. 06-50057, Western District of Texas, San Antonio Division

The Firm was counsel to the secured lender.

In re Living.com, Inc and Shaw Furniture Galleries, Inc., Case No. 00-12522-cag, Western District of Texas, Austin Division

The Firm was counsel to a Chapter 11 trustee of an Austin-based e-commerce company.

Representation of a Chapter 11 bankruptcy estate in sale and licensing of intellectual property assets.

Creditors’ Committee counsel in the Austin bankruptcy case of the parent company of multi-national restaurant chains.

Liquidating Trustee and Creditors’ Committee counsel in *AgriBioTech, Inc.*, Chapter 11 Bankruptcy Case No. 00-10533, District of Nevada, a Las Vegas bankruptcy case of an international developer and distributor of turf and forage seeds.

Debtor’s counsel for Avado Brands, Inc. in the Dallas case of two multi-state restaurant chains.

Debtor’s counsel for a multi-state pharmacy franchisee in a pre-packaged bankruptcy.

Cross Border

In re SANJEL (USA) Inc., et al., Case No. 16-50778-CAG-15, filed for bankruptcy Western District of Texas, Midland Division, and CCAA in Calgary, Canada

We represented the foreign representative of five U.S. based oilfield service companies.

Investor Oversight Board (“IOB”) for I.G. Services, Ltd. (“IGS”) and IWG Services, Ltd. (“IWG”) filed for bankruptcy Western District of Texas, San Antonio Division and in the Grand Court of the Cayman Islands

We represented the post-confirmation Investment Oversight Board (“IOB”) which consisted of Mexican investors. We advised the IOB with regard to the pursuit of claims and causes of action.

In re Villaje Del Rio, Ltd., Case No. 06-50797, Western District of Texas, San Antonio Division

The Firm represented Colina Del Rio, LP in connection with its role as an assignee of a non-recourse note secured by an uncompleted, multi-million dollar, mixed-use development property. Issues involved liability of assignee for alleged claims and causes of action asserted against the original holder of the note in connection with construction of property, including the ability to offset, prohibit or limit rights of secured creditor's credit bid and opposition to attempts by the secured lender to foreclose the property. Representation included defending an appeal to the Fifth Circuit on an issue of first impression. *Villaje Del Rio, Ltd. v. Colina Del Rio, LP (In re Villaje Del Rio, Ltd.)*, 283 Fed.Appx. 263 (5th Cir. June 25, 2008).

In re Joseph D. Milanowski, Case No. 07-13162, District of Nevada

We were lead counsel in the representation of the Chapter 11 Trustee, Ford Elsaesser. Mr. Milanowski was a principal in three entities which brokered commercial mortgages and/or acquired commercial properties around the United States. Contingent and liquidated liabilities exceeded \$300,000,000.

In re American Rice Inc., Case No. 98-21254-C-11, Southern District of Texas, Corpus Christi Division

We were Creditors' Committee counsel in bankruptcy case of an international distributor of rice.

Asset Acquisition

Dee Howard Aircraft

Our client, a Singapore-based aviation maintenance company, acquired leasehold interests and assets out of a bankruptcy estate. We assisted our clients in the initial bid proposal, negotiation through auction and closing of this transaction. We also guided our client through the complex regulatory and national-security related requirements.

Acquisition of Assets from Financially Distressed National Retailer of Computer Equipment and Software

We assisted our client, an international telecommunications/media company, in its acquisition of certain assets from a financially distressed national retailer of computer equipment and software used in its computer services division. We worked closely with company counsel to evaluate insolvency risk and structure the transaction to reduce the risk to our client.

Fairchild Aircraft, Case No. 02-52353-LMC, Western District of Texas, San Antonio Division

Lead counsel for the buyers in the acquisition of the various assets, including a commuter aircraft manufacturer and airline maintenance, repair and overhaul facility.

In re Physicians Specialty Hospital of El Paso East, LP, Case No. 07-30633, Western District of Texas, El Paso Division

Plan Mediator

Plan Mediator for Cordillera, a golf resort and development in Colorado.

Mediator in *U.S. Realm Powder River, LLC f/k/a Moriah Powder River, LLC*, Case No. 19-20699, District of Wyoming, a natural gas development in Utah.

Education

- University of Houston Law Center, J.D., *cum laude*, 1981
- The University of Texas at El Paso, B.A., *with honors*, 1977

Bar Admissions

- Texas, 1982

Professional Recognition

- Martindale-Hubbell® AV® Preeminent™ [Peer Review Rating](#), 1993-Present
- Recognized in *The Best Lawyers in America*® for Bankruptcy and Creditor Debtor Rights / Insolvency and Reorganization Law, 1995-2024
- Named to "Lawdragon 500 Leading U.S. Bankruptcy & Restructuring Lawyers," 2020, 2022, 2023, and 2024
- Recognized by *San Antonio Magazine* in "San Antonio's Top Attorneys" for Bankruptcy & Workout, 2019-2023
- Named a Texas Leading Lawyer in Bankruptcy/Restructuring by *Chambers USA*, 2003-2024
- Named to *The American Lawyer's* "South Trailblazers" list, 2022
- Recognized by S.A. Scene, as an "Outstanding Women in Law" for Bankruptcy, 2022
- Recognized as one of the "Top 50 Lawyers in Central/West Texas," *Texas Super Lawyers*®, 2022 and 2023
- Recognized in *Texas Super Lawyers*® for Bankruptcy: Business, 2003-2023
- Recipient of the *San Antonio Business Journal's* 2019 Outstanding Lawyers Award
- Recipient of the *Michelle A. Mendez Award of Excellence* for outstanding service to the Bankruptcy Law Section, 2017
- Finalist in Bankruptcy for the "Go-To-Guide," Texas Lawyer, 2007 and 2012
- American Bankruptcy Institute, "Lifetime Achievement Award", 2011
- Named "San Antonio Bankruptcy & Creditor-Debtor Rights Lawyer of the Year," *The Best Lawyers In America*®, 2011
- Selected for inclusion as a "Top Lawyer," *Corporate Counsel*® - January 2010 Annual Guide
- Selected for inclusion in the "Top 50 Women Lawyers in Texas," *Law and Politics Magazine*
- Selected for inclusion in the "Top 50 Women Lawyers in Texas" *Texas Super Lawyers*®
- *Euromoney Guide to Leading U.S. Insolvency Lawyers*
- Recognized by S.A. Scene in "San Antonio's Best Lawyers" for Bankruptcy
- *Strathmore's Who's Who*

Affiliations

Professional

- State Bar of Texas, Bankruptcy Law Section, Chair, 2006-2007
- Texas Bar Foundation, Life Fellow

- American College of Bankruptcy, Fellow (1998), Director, and Board of Regents, 2013-present
- American Bankruptcy Institute, President, 1997-1998
- US Mexico Bar Association, Board of Directors, 2008-2013
- American Board of Certification, Treasurer, 2007
- Texas Board of Legal Certification, Chair Bankruptcy Law Commission, Chair, 2003-2006
- American Bar Association Litigation Section, Bankruptcy and Insolvency Litigation Committee, Chair, 2010-2013
- National Association of Federal Equity Receivers (NAFER), Member
- Dykema Executive Committee, 2015-2018

Community

- San Antonio Public Library Foundation, former Director and Member of the Executive Committee
- Hope for the Future, Scholarships for Catholic Education, Former Board Member
- On the Way – Ándale! Co-Chair for San Antonio Archdiocese Capital Campaign

EXHIBIT F-2

Danielle Rushing Behrends

Member



Contact

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Overview

When clients face bankruptcy and restructuring and receivership matters, Danielle is sensitive to their difficult financial situations and immerses herself as their advocate. She is driven by the opportunity to provide clients with successful solutions to address their complex legal and financial needs.

Clients rely on Danielle for her resourceful, creative, and effective in and out of court restructuring advice. She looks for practical solutions and works to build a strategic plan that aligns with her client's needs. Her experience includes several multi-million dollar businesses, particularly in the oil and gas/energy, retail, national fitness chain, healthcare, and transportation industries, Chapter 11 Trustees, and a federal court-appointed receiver. In particular, she has drafted and argued numerous motions and examined adverse and friendly witnesses in state and federal courts.

Drawing on multiple judicial internships and a clerkship and commercial litigation experience with a civil litigation firm, Danielle provides clients with a 360-degree perspective on navigating the U.S. Bankruptcy Code. Early on, Danielle had the honor and privilege of learning from the Honorable Craig A. Gargotta, (now Chief) United States Bankruptcy Judge for the Western District of Texas, the Honorable Catherine M. Stone, Chief Justice (Ret.) of the Fourth Court of Appeals of Texas, and the Department of Justice's U.S. Trustee Program.

Areas of client focus

Practices

Corporate and Finance
Healthcare
Litigation
Restructuring and Bankruptcy

Industries

Energy and Natural Resources
Financial Services
Financial Services Litigation
Loan Workouts, Restructuring,
and Bankruptcy

Experience

Chapter 11 Debtor Representation

- Counseled Gold's Gym and related entities in the expedited and successful auction, sale, and confirmation processes during the global pandemic, resulting in \$100 million sale and projected 100% payout for creditors and anticipated dividend for equity. In re GGI Holdings, Lead Case No. 20-31318 (Bankr. N.D. Tex.).
- Initiated a sale process for one the largest continuing care retirement communities in the country. In re Henry Ford Village, Inc., Case No. 20-51066 (Bankr. E.D. Mich.).
- Guided client in compliance and sale of land that went into bankruptcy to avoid foreclosure and the mounting costs of litigation related a failed sale process in Los Angeles, California. In re 110 West Properties, LLC, Case No. 19-24048 (Bankr. C.D. Cal.).
- Counseled a privately held oil and gas company with significant acreage in the Bakken region of North Dakota. Helped client run a sale process with several bidders for the debtor's oil and gas assets during global pandemic. In re New Emerald Energy, LLC, Case No. 20-41754 (Bankr. N.D. Tex.).
- Guided oil and gas exploration and production company and affiliate with \$146.5M book value and 38,000 leased acres in Oklahoma through sale and confirmation processes, complicated by numerous pre-petition class-action earthquake lawsuits. In re Red Fork (USA) Investments, Inc., Lead Case No. 18-70116 (Bankr. W.D. Tex.).
- Advised independent oil company, exploration and production company, and power company debtors with state-of-the-art steam flood operations in Kern River Valley, California, and estimated enterprise value of \$175M-\$195M through sale and confirmation processes. In re All American Oil & Gas Incorporated, Lead Case No. 18-52693 (Bankr. W.D. Tex.).

Chapter 7 Debtor Representation

- Counseled non-profit arts corporation through Chapter 7 bankruptcy, resulting from failed labor negotiations. In re Symphony Society of San Antonio, Case No. 22-50656 (Bankr. W.D. Tex.).

Receivership

- First chair counsel to federal court-appointed receiver in an action brought by the SEC against 10 entities and 5 individuals in connection with alleged \$122 million oil and gas offering fraud. SEC v. The Heartland Group Ventures, LLC, et al., No. 4:21cv-1310 (N.D. Tex.).

Committee and Trustee Representation

- Represented Chapter 11 Trustee over former lawyer and law firm in one of largest cases filed in San Antonio. In re Chris Pettit & Associates, P.C. & Christopher John Pettit, Lead Case No. 22-50591 (Bankr. W.D. Tex.).

Creditor Representation

- Assisting a multinational food-products corporation in bankruptcy strategy and representation as unsecured and secured creditor.
- Counseling a Fortune 100 technology company in bankruptcy strategy and representation as unsecured and secured creditor.
- Assisting a multinational food-products corporation in bankruptcy strategy and representation as unsecured creditor.
- Counseling a Fortune 50 energy company in bankruptcy strategy and representation as unsecured and secured creditor.
- Advising national small business lender in bankruptcy strategy and representation as secured creditor.

Education

- St. Mary's University School of Law, J.D., 2016, Senior Associate Editor for the St. Mary's Law Journal
- Louisiana State University, B.S., 2013

Bar Admissions

- Texas, 2016

Professional Recognition

- Named to *Best Lawyers'* "Ones to Watch" list for Bankruptcy and Creditor Debtor Rights / Insolvency and Reorganization Law; Litigation - Bankruptcy, 2023 and 2024
- Bexar County Women's Bar Association and Foundation – Belva Lockwood Outstanding Young Lawyer Award, 2023
- Recipient of the St. Mary's University School of Law Graduate of the Last Decade (GOLD) 10 Under 10 Award, 2022
- Recognized by *S.A. Scene*, as an "Outstanding Women in Law" for Bankruptcy, 2022
- Recognized by *San Antonio Magazine* in "San Antonio's Top Attorneys" for Bankruptcy & Workout, 2019-2023
- Featured in *San Antonio Woman Magazine* for volunteer pro bono service, 2022
- Recipient of the American Bar Association 20/20 Partners Rising Young Leader Award, 2021
- Recognized by *S.A. Scene* in "San Antonio's Best Lawyers" for Bankruptcy
- Recognized by *S.A. Scene*, as a "San Antonio Rising Star" for Bankruptcy
- Featured in *Texas Bar Journal* as Access to Justice Pro Bono Champion, Apr. 2020
- Selected as a member of the Bexar County Women's Bar Foundation's LEAD Academy's 2019 class

Affiliations

Professional

- Texas Access to Justice Commission, Working Group 2024
- Larry E. Kelly American Bankruptcy Inn of Court (2015-present) ◦ Bylaws Committee ◦ Judge Monroe and Judge McConnell Scholarship and Writing Competition Selection Committee
- National Conference of Bankruptcy Judges – Next Generation Program, Class of 2023
- San Antonio Young Lawyers Association and Foundation, Director and Board Member (2018-2022)
- Bexar County Women's Bar Association and Foundation, Director (2018), Secretary (2019), Vice President (2020), President-Elect (2021), President; BCWBF LEAD Academy Steering Committee (2022)
- NAFER, Young Professionals Committee, Conference Committee, and Judicial Outreach Committee
- Dykema Women's Business Initiative, Texas Leader
- Class of 2020-21 LeadershipSBOT
- Texas Bar Foundation, Fellow

- State Bar of Texas, Member of the State Bar's Minimum Continuing Legal Education Committee, Bankruptcy Section's Young Lawyers Committee, Communications Liaison (2021), Non-Lawyer Outreach Liaison (2020), Women in Law Section, Member, Bankruptcy Section, Member
- San Antonio Bar Association
- American Bankruptcy Institute; Strength in Diversity Editorial Board
- William S. Sessions American Inn of Court (2018-2021)
- American Bar Association - ABA Young Lawyers Division Bankruptcy Law Committee Chair (2021-2022)
- San Antonio Bar Foundation, Fellow Class of 2020
- Texas Young Lawyers Association
- Texas Bar College
- Phi Kappa Phi
- St. Mary's University Law Alumni Association
- San Antonio Legal Services Association (formerly San Antonio Bar Association's Community Justice Program), Board Member, Volunteer Pro Bono Attorney
- Texas Rio Grande Legal Aid, Volunteer Pro Bono Attorney
- National Association of Federal Equity Receivers (NAFER), Member

Community

- San Antonio Stock Show & Rodeo Auction Committee—Barrow Subcommittee (present)
- San Antonio Stock Show & Rodeo Fajita Corral Committee (2017-2022)
- Junior League of San Antonio's Paving New Paths, benefiting Clarity Child Guidance Center, Chair and Board Member (2022-2023), Assistant Chair (2021-2022)

Michael G. Cumming

Member



Contact

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Overview

No disrespect to other tax lawyers, but Mike Cumming's clients actually enjoy talking to him. He's personable, approachable, funny, and can translate complicated tax rules and structures into language his high-end, high-net-worth individuals can easily understand.

As head of the firm's tax practice group, Mike's clients include family offices, C-suite executives, and others with substantial means who want to maximize personal and multi-generational wealth while minimizing taxes. His practice involves estate planning, probate and trust administration, sophisticated tax strategies, business successions, and negotiation of premarital agreements.

Mike excels at restructuring clients' privately owned businesses and estates to preserve assets and reduce tax exposure. Every matter Mike handles poses different challenges, such as ever-changing tax laws, non-traditional families, and unusual assets.

He not only methodically disassembles and reconfigures clients' financial lives but has an uncanny ability to get them excited about implementing the changes.

Although he leads the effort, Mike doesn't work alone. He frequently collaborates with corporate and finance, real estate, and litigation colleagues at Dykema as well as his clients' CPAs, financial advisors, and insurance agents to craft and execute each new plan.

Despite careful planning, disagreements and disputes can arise. When they do, Mike represents individuals, fiduciaries, and estates in will and trust contests and probate litigation, striving to find amicable solutions whenever possible to preserve families and businesses.

Areas of client focus

Practices

Tax
Estate Planning and
Administration
Public Retirement
Corporate and Finance

Credentials

Education

- University of Notre Dame, J.D.
- University of Michigan, B.B.A., with high distinction

Bar Admissions

- Michigan, 1984

Professional Recognition

- Recognized in *Chambers High Net Worth Guide* for Michigan, Private Wealth Law, 2020
- Recognized in *The Best Lawyers in America*® for Trusts and Estates, 2003-Present. Copyright 2015 by Woodward/White, Inc., Aiken, SC
- Named a Michigan Leading Lawyer in the areas of Trust, Will & Estate Planning Law by the *Leading Lawyers Network*, 2014-2017. Law Bulletin Publishing Company
- Named a Top Lawyer by *dbusiness Magazine* for Trusts and Estates, 2010-2011, 2013-2014, 2016, 2018
- Recognized in *Michigan Super Lawyers*® for Estate Planning & Probate and Tax, 2006-Present
- Recipient of an AV® Preeminent™ Rating by *Martindale-Hubbell*

Affiliations

Professional

- Legal/Financial Network Group of the Community Foundation for Southeastern Michigan, Member
- American College of Trust and Estate Counsel, Fellow
- State Bar of Michigan, Probate and Estate Planning Council, Member, 1991-1997; Michigan and Federal Estate Tax Committee, Chair, 1995-1997; Transfer Taxes Committee, Member, 1998-present; *Michigan Probate and Estate Planning Journal*, Editor, 1992-1993; Amicus Curiae Committee, Chair, 1995-1997; Fees and Compensation Committee, Chair, 1991-1992; *Michigan Probate and Estate Planning Journal*, Associate Editor, 1991-1992; Estates and Protected Individuals Code Legislative Enactment Group, Member, 1995-1997; Section Lobbying Liaison, 1995-1997; Michigan Inheritance Tax Committee, Member, 1990-1992; Ethics Committee, Member, 1991-1992; Standing Committee on Code, Procedure and Rules, Member, 1988-1995; Estates and Protected Individuals Code Article 2 Drafting Subcommittee, Member, 1990-1995; Estate Tax Apportionment Statute Drafting Subcommittee, Member, 1995
- The Financial and Estate Planning Council of Metropolitan Detroit, Member
- Taxation Section of the American Bar Association, Member
- Taxation Section of the State Bar of Michigan, Member
- Michigan Chamber of Commerce, Tax Policy Committee, Member

Jeffrey C. Gifford

Member



Contact

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Overview

Parties to complex mergers and acquisitions and other large and multifaceted transactions may not all be on the same team, but Jeff Gifford knows how to get them on the same page. Jeff leverages his collaborative nature and talent for bringing people together to efficiently shepherd and consummate high-stakes deals.

Clients rely on Jeff's practical and pragmatic guidance when new opportunities arise or risks emerge. He listens carefully to each client's concerns and goals and charts a clearly defined course of action to address the former and accomplish the latter.

Combined with his problem-solving acumen, Jeff's intuitive understanding of what it takes to protect his clients' interests in complex commercial and securities transactions or when structuring, drafting, and implementing joint ventures makes him an invaluable partner for businesses.

Jeff works closely and seamlessly with accountants, investment bankers, and other professionals to address and resolve the complex issues that characteristically arise in the transactions he handles. He tailors his role in each deal to align best with his client's objectives and is equally adept at quarterbacking a deal as he is running with the ball.

Counseling clients on mergers and acquisitions, public and private securities transactions, joint ventures, and domestic and international commercial transactions, Jeff prides himself on his responsiveness, professionalism, and high ethical standards. Active in many philanthropic and charitable endeavors, Jeff is as committed to his community as he is to his clients.

Areas of client focus

Practices

Corporate and Finance
Governance
Healthcare
Mergers and Acquisitions
Private Equity
Public Finance
Securities

Industries

Financial Services
Healthcare M&A
Management Services
Organization
Oil and Gas

Experience

Mergers, Acquisitions and Dispositions

- Acquisition of optometric practice for one of the largest optical chains in the United States.
- Acquisition of various Georgia-based dental practices for Texas-based Dental Service Organization (DSO).
- Sale of assets of crude oil and natural gas exploration and production company for \$87.2 million.
- Acquisition of leader in industrial flow control equipment for NASDAQ-traded global leader in industrial air quality and fluid handling solutions.
- Merger between an innovative non-acute longevity healthcare services provider and healthcare technology company.
- Acquisition of a leading global supplier of membrane-based industrial water and wastewater treatment systems for NASDAQ-traded global leader in industrial air quality and fluid handling solutions.
- Acquisition of industrial air quality consultancy and engineering firm for NASDAQ-traded global leader in industrial air quality and fluid handling solutions.
- Acquisition of asphalt operations and assets for \$450 million plus inventory of approximately \$370 million.
- Sale of one of the premiere global exterior and interior automotive rearview mirror manufacturers to a Canadian investment group for \$320 million, plus the assumption of \$95 million in debt.
- Representation of London Stock Exchange Company in an approximate \$160 million stock and asset acquisition of the largest privately owned United States pest control business.
- Assisted one of the nation's largest security services companies, publicly traded in the U.K., with a \$75 million disposition of all of its U.S. security service entities to a U.S. publicly traded company, which allowed our U.K. client to focus its efforts on building a stronger base in its core U.S. business.
- Represented private health care software company in \$62 million acquisition by private equity firm.
- Represented E&P company in \$40MM purchase of Delaware Basin producing leasehold assets.
- Sale of an interior design, engineering, and maintenance service business valued over \$30 million.
- Acquisition of \$30 million international well servicing rigs business.
- Negotiated and closed several 7-figure purchase and sale agreements of upstream oil and gas assets.
- Sale of \$55 million worth of international well servicing rigs business.
- Sale of an aircraft engineering and finishing business specializing in VVIP and head-of-state aircraft interiors valued at \$40 million.
- Sale of the largest IBM value-added reseller in the U.S. through a recapitalization transaction with a national private equity fund.
- Sale of \$13 million historical work of art.
- Sale of a historical Boeing B-17G bomber and related assets valued at \$4 million.
- Represented a pharmaceutical manufacturer in a \$1.2 million manufacturing joint venture investment.
- Acquisitions and Sales of Multiple State Banks and Branches throughout Texas.
- Facilitated the acquisition of a private market research, analysis and advertising company, by one of the leading publicly traded market research and advertising companies.
- Coordinated and directed a thin film disposition equipment manufacturer's acquisition of a competing manufacturer located in Taiwan which strengthened our client's strategic position in Asia allowing greater delivery capabilities to Asian markets.

- Helped our client to acquire two related Canadian private manufacturers of water heating systems and related products, providing our client with a better strategic position in Canadian and North American markets.

Securities

- Represented our client in a \$216 million offering to the U.S. Department of Treasury to provide our client with additional capital to facilitate further lending and potential acquisitions of other financial institutions.
- Assisted our client with a \$100 million shelf offering of its common stock providing our client with greater capital resources to expand its U.S. and European operations into Asian markets.
- Orchestrated a complex refinancing for an oil and gas development and production client that included a \$125 million debt offering and subsequent exchange.
- Representation of a public company in connection with a \$150 million shelf offering.
- Representation of a public company in connection with a \$88 million follow-on public offering.
- Represented numerous health care, technology, manufacturing and financial institutions in raising private funds to further corporate objectives.
- Regularly assist several clients with their preparation and filing of SEC reports and related filings, including response letters to SEC comment letters.

Commercial Transactions

- Drafted and negotiated software license and related professional service agreements with major computer software and information technology consulting companies for comprehensive ERP software suite affecting virtually every aspect of the client company.
- Represented numerous clients in various contractual arrangements involving companies doing business in Europe, Asia, South America, Africa and Australia.

Credentials

Education

- University of Michigan Law School, J.D., 1999
- Brigham Young University, B.A., 1996

Bar Admissions

- Texas, 2004
- Michigan, 1999

Professional Recognition

- Recognized in *The Best Lawyers in America*® for Banking and Finance Law; Corporate Governance Law; Mergers and Acquisitions Law; Corporate Compliance Law, 2021-2024
- Named a Texas Leading Lawyer in Corporate/M&A Law by *Chambers USA*, 2021-2024
- Recognized by *San Antonio Magazine* in "San Antonio's Top Attorneys" for Corporate Finance Mergers & Acquisitions, 2019-2023
- Recognized in *Texas Super Lawyers*® for Business & Corporate; Securities & Corporate Finance; Mergers & Acquisitions, 2022-2024
- Recognized by S.A. Scene in "San Antonio's Best Lawyers" for Corporate Governance/Compliance
- S.A. Scene, "San Antonio's Rising Stars"

- Selected for inclusion as a "Texas Rising Star," *Law and Politics Magazine*, 2010-2011
- *San Antonio Business Journal*, "Forty Under Forty," 2009

Affiliations

Professional

- American Bar Association
- Federal Bar Association
- State Bar of Texas
- San Antonio Bar Association
- Association of Corporate Counsel, Ethics Follies Presenter

Community

- North San Antonio Chamber Board of Directors, 2012-2014
- North San Antonio Chamber of Commerce Leadership Lab, Alumnus
- Greater San Antonio Chamber of Commerce, Leadership San Antonio, Class XXXIV
- Greater San Antonio Chamber of Commerce, Economic Development Council, Steering Committee Member, 2008
- Alamo Area Council of the Boy Scouts of America, numerous positions held
- San Antonio Management Society, Co-founder and Former Treasurer

Alanna M. Dominguez

Associate



Contact

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Overview

Alanna is a passionate advocate for clients' cases. She is a decorated Army combat Veteran of over 22 years of active service with a keen sense of discipline, organization, and time management. During her years of service, Alanna commanded one of the largest battalions in the military, overseeing 15 subordinate units containing 1,900 soldiers. Alanna was attracted to commercial litigation because of its complexity and attention to details that most matters require. Known as an efficient and highly responsive attorney, Alanna is committed to getting clients accurate and timely answers while ensuring their matters stay on track.

Because of her diverse background and wealth of experience, Alanna's practice is multifaceted. Alanna represents insurers in coverage litigation and because of her background in civil engineering and construction, insurance construction defense. Alanna is also uniquely suited to commercial litigation matters concerning supply chain management because she is a Certified Professional in Supply Management. In addition to orchestrating logistics for the military in contested environments, Alanna managed supply chain operations at a large semiconductor factory where she was also a certified process auditor for automotive manufacturing.

Alanna enjoys utilizing her background along with her legal skills to help clients streamline operations and avoid conflicts. Her desire to help people in times of crisis is at her core, and she anticipates the legal path ahead to develop strong strategies for her clients.

Alanna earned her Bachelor of Science in Engineering from the United States Military Academy at West Point. She has a Master of Business Administration from St. Martin's University and earned her Juris Doctor from St. Mary's University School of Law, graduating *cum laude* and

Areas of client focus

Practices

Commercial Litigation
Litigation

recognized with the Dean's Award for service.

Alanna continues to serve; she is involved in her Castle Hills community, the Veterans community, and enjoys mentoring law students at St. Mary's. She is passionate about her family and soccer.

Credentials

Education

- St. Mary's University School of Law, J.D., *cum laude*, 2023
- St. Martin's University, MBA, 2000
- United States Military Academy at West Point, B.S., 1992

Bar Admissions

- Texas

Affiliations

Professional

- San Antonio Bar Association, Member
- Bexar County Women's Bar Association, Member
- American Bar Association, Member
- Institute of Supply Management, Member

Community

- Castle Hills Women's Society, Board Member
- Aquinas Institute Veteran's Scholarship, Board Member
- Veterans of Foreign Wars, Post 8541, Gold Member

Related Employment

- Senior Engineer and Facilities Supervisor-Inventory Management, Samsung
- Retired Army Veteran

Dominique A. Douglas

Associate



Contact

San Antonio
210-554-5204
ddouglas@dykema.com

Overview

Dominique Douglas is an associate attorney in Dykema's San Antonio office. She focuses her practice on business services and bankruptcy matters.

Dominique advises clients on a range of business and financial matters, including debt restructuring, insolvency, and commercial transactions. Dominique distinguishes herself through exceptional client service, leveraging her strong interpersonal skills and proactive approach to drive successful outcomes.

Prior to joining Dykema, Dominique served as a Term Law Clerk to the Honorable Scott M. Grossman at the U.S. Bankruptcy Court, Southern District of Florida. In this role, she assisted Judge Grossman in preparing for hearings, including Chapter 11 confirmations, motion calendars, and adversary proceedings.

Areas of client focus

Practices

Corporate and Finance
Restructuring and Bankruptcy

Industries

Loan Workouts, Restructuring,
and Bankruptcy

Credentials

Education

- University of Mississippi School of Law, J.D., *cum laude*, 2022
- Business Law Certificate
- Howard University, B.A., 2018

Bar Admissions

- Alabama
- Texas

Affiliations

Professional

- International Women's Insolvency & Restructuring Confederation (IWIRC), Member
- American Bankruptcy Institute, Member
- Larry E. Kelly Bankruptcy American Inn of Court, Member



Theresa Dick
Business Litigation Paralegal
201 Townsend Street, Suite 900
Lansing, MI 48933
(616) 776-7546
TDick@dykema.com

Theresa has 15 years of experience as a litigation paralegal, including second chair of 6 successful trials. Her experience includes working on cases related to product liability defense, employment litigation, and business/commercial litigation. She has thorough understanding of the litigation process from beginning to end, and has extensive experience managing document intensive cases. She routinely provides assistance with e-discovery, review and analysis of medical records and deposition transcripts, and helps prepare trial exhibits. In addition, she drafts discovery requests, responses, initial disclosures and subpoenas, and helps with witness interviews.

Education

- Certified Paralegal, ABA approved, St. Mary's College of Moraga, CA

Adrianna Lafuente
Litigation, Commercial
Dallas, TX
4-6446

ALafuente@dykema.com

Excellent organizational, interpersonal and communication skills – passionate about people. Adept in exercising independent judgment while maintaining varied amounts of responsibility. Capable of managing and adhering to strict deadlines. Advanced computer programming, word processing and record-keeping skills. Proactive, cooperative, self-sufficient, and a resourceful team player.

Education:

- B.A. – Political Science; University of Texas at Austin

Experience:

- Paralegal since 2008
- Experienced in all aspects of complex litigation from pretrial to post trial including:
 - Fact investigation
 - Legal research
 - Document production
 - Case and database management (e-discovery)
 - Deposition preparation including review of transcripts and summaries
 - Drafting pleadings, discovery, and correspondence
 - Preparation of attorney-working notebooks
 - E-filing in state and federal courts

Technology Proficiencies:

- Lexis
- iManage
- NetDocuments
- IPRO
- MS OFFICE
- eRoom
- Relativity
- Concordance
- Trial Director
- Adobe Pro

EXHIBIT F-3

Rose L. Romero



Attorney and Counselor at Law

Romero | Kozub
235 N.E. Loop 820, Suite 310
Hurst, Texas 76053
817.616.3067
817.887.2288 (fax)
RRomero@rrdklegal.com

Rose Romero, a former Executive Assistant United States Attorney in the Northern District of Texas and Regional Director in the Securities and Exchange Commission's Fort Worth Office, is a Managing Attorney at the Law Offices of Romero | Kozub in the Dallas-Fort Worth Metroplex. She concentrates her practice on white-collar grand jury investigations, SEC examinations and investigations, general state and federal criminal matters and cybersecurity issues. She is a frequent contributor to panels and publications concerning new developments in white-collar issues, securities enforcement matters, and the cybersecurity area.

Prior to joining the Law Offices of Romero | Kozub, Rose was a Partner at Thompson & Knight's Dallas Office where she served as the co-chair of Thompson & Knight's cross-practice Data Privacy and CyberSecurity team, and counseled clients on data privacy solutions, cybersecurity regulatory developments, the development of effective cybersecurity compliance programs and incident response plans.

Rose served as the Regional Director for the Fort Worth office of the U.S. Securities and Exchange Commission, where she led the Enforcement and Examination Programs for the Southwestern Region and served on the Enforcement Division's National Leadership Team. Rose directed regulatory examinations of investment advisers and broker-dealers and managed enforcement actions involving violations of the Foreign Corrupt Practices Act, insider trading, accounting and corporate reporting violations, and fraud involving investment advisers, hedge funds, and broker-dealers.

Before her service with the SEC, Rose spent sixteen years prosecuting cases involving all levels of corporate fraud, including financial, healthcare, and mortgage. As the Executive Assistant U.S. Attorney, she oversaw a number of cyber intrusion investigations and prosecutions. She personally tried more than 60 federal criminal cases to favorable jury verdicts and conducted numerous grand jury investigations and prosecutions in conjunction with the Department of Justice's Criminal Division.

Rose has served on special assignments for the Department of Justice, including serving as an advisor and instructor for the Overseas Prosecution Development and Assistance Program in Ecuador, Colombia, Argentina, Brazil, Venezuela, Peru, Honduras, and Mexico. She investigated terrorism cases and frequently appeared before the Foreign Intelligence Surveillance Court.

Practices Areas

White Collar Criminal Litigation
Securities Litigation and SEC Enforcement
Corporate Governance and Internal Investigations
Data Privacy and CyberSecurity
Government Litigation
Government and Regulatory
Immigration
Trial

Education

J.D., 1987, SMU Dedman School of Law
B.S., 1980, Texas Christian University

Admissions

Texas
U.S. Ct. of App., Fifth Circuit
U.S. Dist. Ct., N. Dist. Texas

Languages

Spanish

Rose L. Romero

Prior Experience

- Partner, Thompson & Knight LLC, 2011–2015
- Regional Director, Securities and Exchange Commission, Fort Worth, Texas, 2006–2011
- Assistant United States Attorney, Northern District of Texas, Fort Worth and Dallas, Texas, 1989–2006
- Assistant District Attorney, Tarrant County District Attorney's Office, Fort Worth, Texas, 1987–1989
- Police Officer, Fort Worth Police Department, Fort Worth, Texas, 1980–1985
- United States Air Force, 1974–1978

Distinctions/Honors

- Prosecutor of the Year
- Chief Postal Inspectors Award
- Drug Enforcement Administration's Director's Award for Excellence
- Numerous commendations and awards from government agencies, including the Department of Justice, FBI, U.S. Customs Service, and the IRS

Activities (Memberships/Affiliations)

- Member, State Bar of Texas
- Member, Dallas Bar Association
- Member, Tarrant County Bar Association
- Member, Texas Wall Street Women

Publications

"Walking the Straight and Narrow: Strategies to Comply with State, Federal, and International Privacy Laws"	October 16, 2014
"Cybersecurity: What Attorneys (and Their Clients) Need to Know"	October 9–10, 2014
"Strategies for Preventing and Prosecuting Cyberstalking or Harassment Crimes"	2014
Client Alert: Spear Phishing Scams Targeting Corporate Executives	June 10, 2014
"What Every Executive Should Know About Cybersecurity"	May 19, 2014
Client Alert: SEC Tells Investment Advisers and Private Equity Firms to Prepare for Cyber Attacks	May 19, 2014

Rose L. Romero

"The Anatomy of a Data Breach Response: The Steps You Need to Take in the First Hours and Days Following a Breach and Why it is Critical to Get it Right"	May 9, 2014
"Are You Ready?"	February 27, 2014
"Cyber Security in the Retail Industry: Answering a Strategic Threat"	February 19, 2014
"Emerging Hacking Trends Impacting Retailers"	January 29, 2014
Client Alert: Preparing for the Cybersecurity Challenges of 2014	January 21, 2014
"Cyber Crime: Risks and Liabilities to Banks and the Financial Services Industry"	November 14, 2013
"Impact of Cyber Attack – Legal, Prosecution and Risk Management Perspectives"	October 29, 2013
"That Cyber-Attack May Be an Inside Job"	October/November 2013
"Cyber Crime and Incident Round Table"	June 27, 2013
"Cybercrime: Investigations and Litigation"	June 18, 2013
"Foreign Corrupt Practices Act: There is No Turning Back"	May 30, 2013
"The Cyber War on U.S. Companies: Protecting Your Company and Your Data from Cyber Attacks"	April 25, 2013
"Who is Spying & Stealing from You? Protecting your Documents & Secrets Abroad"	March 21, 2013
"What's Hot with the Feds: Update on FCPA, Dodd-Frank Whistleblower, and Tax Fraud"	December 6, 2012
Client Alert: DOJ and SEC Release FCPA Resource Guide that Emphasizes the Need for Updated Compliance Plans	November 20, 2012
"A CyberCrime Primer"	October 11, 2012
"From Twitter to the Global Economy: Changes in the Trade Secret Landscape"	Fall 2012
"Industrial Espionage and Theft of Trade Secrets"	August 1, 2012
"Combating Global Intellectual Property Crimes: Theft of Trade Secrets, Digital Piracy, and Trafficking of Counterfeit Goods"	June 21, 2012
"The Cost of Doing Business: Managing FCPA Risks in Latin America"	April 10, 2012
"Energy Companies Find Profits, Peril in Latin America"	April 9, 2012

Rose L. Romero

"Corporate Governance: Dilemmas & Challenges"	March 24, 2011
"SEC Perspectives, including New Tools for Identifying and Investigating Enforcement Issues"	February 11, 2011
"Current Trends and SEC Enforcement Initiatives"	February 2011
Foreign Corrupt Practices Act Seminar	Texas 2010
"Developments, Trends and Expectations in Securities Fraud Investigations and Prosecutions"	June 10, 2010
"The FCPA: It's not just another Four Letter Word"	October 16, 2009
SEC Enforcement Developments (panelist), Practicing Law Institute's "SEC Speaks," Washington, D.C.	February 2007

News

Rose Romero Quoted in <i>The Dallas Morning News</i> on Data Breaches In the News	March 17, 2014
Rose Romero Quoted on CBS on The Cloud In the News	February 17, 2014
Rose Romero Interviewed by KLIF-AM on Bitcoin-Related Fraud In the News	July 30, 2013
Rose Romero Featured in <i>Texas Lawbook</i> on Corporate Cybersecurity In the News	July 17, 2013
Rose Romero and Richard Roper Interviewed by KLIF-AM on Cybersecurity In the News	June 22, 2013
T&K Launches Dedicated Initiative to Help Companies Reduce Cyberrisks, Respond to Data Breaches Press Release	June 18, 2013
Rose Romero Quoted in <i>Dallas Business Journal</i> on Cyber Attacks In the News	June 14, 2013
Rose Romero Interviewed by FOX DFW on Arlington Police Officer Investigation In the News	June 13, 2013
Rose Romero Quoted in <i>The Huffington Post</i> on ATM Cybercrimes In the News	May 10, 2013
Rose Romero Interviewed by MyFOX DFW on	June 15, 2012

Rose L. Romero

Immigration Law

In the News

T&K Partners Publish Article on FCPA Enforcement in Latin America Press Release	April 17, 2012
Rose Romero Interviewed by <i>Fort Worth Business Press</i> on Health Care Fraud In the News	November 11, 2011
Ricky Raven and Rose Romero Mentioned in <i>Texas Lawyer</i> on New Appointments and Positions In the News	October 17, 2011
Rose Romero Featured in <i>Fort Worth Business Press</i> on Joining T&K In the News	October 10, 2011
Rose Romero Featured in <i>Law360</i> on Joining T&K In the News	September 27, 2011
Former SEC Regional Director Joins T&K Press Release	September 21, 2011

EXHIBIT F-4

Darrell R. Jones

Phone: 832-302-5373; email: drj@oilesquire.com

Work Experience

Law Practice of Darrell R. Jones, PLLC (December 2014 – present)

- > Solo practitioner serving energy clients across a broad spectrum of legal and commercial consulting needs.
 - Assist clients with matters such as acquisitions and divestitures of producing and non-producing properties, from cash transactions, to joint ventures to acreage trades; negotiating and documenting long-term gathering and processing contracts; documentation and negotiation of typical commodity price hedging transactions; advising clients on the pursuit of assets from insolvent companies, as well as on restructuring matters generally; guiding, negotiating and documenting clients' MSA and similar risk management and insurance programs; and providing guidance and advice to clients on land and leasing matters. Extensive experience with ordinary and specialty midstream and terminal agreements (hydrocarbon/water offtake, terminal access and storage contracts).
 - Current active client base ranges from supermajor company to multiple private equity portfolio companies to large privately held companies and family-owned oil companies.
- > Representative matters include:
 - Co-counsel for Silverback Exploration, LLC's \$855 million divestiture to Centennial Resource Development in 2016.
 - Sole counsel for EnCap Investment, L.P. portfolio company's anchor asset acquisition and subsequent bolt-on acquisitions.
 - Documentation and negotiation of numerous hydrocarbon and produced water disposal midstream commercial contracts, representing E&P operators in some cases and disposal operators in others.
 - Numerous sophisticated acreage trades in the Delaware Basin for a supermajor company, involving customized JOA's and other agreements (ongoing).
 - Outside general counsel to a private equity portfolio company during its out-of-court restructuring of significant midstream contractual liabilities, leading to a successful sales process. This included the documentation and renegotiation of sophisticated long-term midstream agreements for gathering, processing and transportation (2018).

Senior Legal Counsel, Newfield Exploration Company (January 2008 – March 2014)

- > Corporate HQ and multi-business unit responsibilities. Reported directly to the General Counsel until 2Q 2013 when department was restructured, then to Deputy General Counsel.
- > Primary responsibility for the structure, documentation and legal negotiation of all significant transactions for the company (other than securities offerings), including acquisitions and divestitures, complex crude oil and natural gas gathering, transportation and marketing arrangements, joint ventures and large-scale operating agreements, and commodity hedging agreements (ISDA & NAESB).
- > Full responsibility for all legal matters pertaining to Texas Gulf Coast, Rocky Mountains (Williston and Uinta Basins) and Appalachian business units, providing support, guidance and judgment for land, asset management and

operations teams. This included documentation and negotiation of typical industry agreements such as sophisticated oil and gas leases, operating agreements, land trades, surface use and water supply agreements, easements and the like, as well as including the management of all litigation and controversy matters.

> Representative matters include:

- Lead attorney/principal negotiator for numerous (>30) A&D transactions totaling several billion dollars in value. Among these matters was Newfield's acquisition of substantially all assets of TXCO Resources, Inc. from bankruptcy.
- Lead lawyer/principal negotiator for 160,000-acre joint venture in the Marcellus Shale, consisting of development and negotiation of custom uniform lease (with surface use provisions) for 1,400+ leases, joint venture agreement and sophisticated operating agreement.
- Co-lead negotiator and lead attorney for multi-billion-dollar long term crude oil sales and refinery expansion agreements with Tesoro Petroleum and HollyFrontier Refining; included development of unique deal structures to accommodate all parties' commercial positions.
- Co-lead of the team that developed Newfield's first counterparty risk management program.
- Successful resolution of numerous actual and threatened lawsuits from landowners, industry partners and the like. I have a proven ability to navigate and manage high-stakes energy litigation skillfully in a variety of contexts.
- Design and legal oversight of entire company's MSA and drilling contracts program.

Shareholder, Cox Smith, San Antonio, Texas (March 2001 – January 2008)

- Practice consisted primarily of "wellhead E&P" matters and various asset acquisitions and divestitures. Extensive experience with land title examination, sophisticated oil and gas leasing matters, operating agreements, surface agreements and other common industry arrangements, as well as numerous A&D matters.
- Significant experience with operations contracts (*e.g.* MSAs and drilling contracts).
- Approximately one-third of practice consisted of oil and gas litigation and controversy matters.

Unit Manager, Federal Correctional Institution - Three Rivers, Texas (1992 – 1998); no relevant experience.

Managing Director of Relentless Production & Development, LLC from March 2014 to December 2014. I did not practice law at this start-up E&P company.

Education and Credentials

J.D., University of Houston Law Center (December 2000), *cum laude*; licensed to practice in May 2001.

M.S. in Criminal Justice, Northeastern University, Boston, MA (1991).

B.S. in Public Justice, St. Mary's University, San Antonio, TX (1990).

Board Certified in Oil, Gas and Mineral Law, State Bar of Texas (2007).

I am recognized as possessing a solid legal skill set tempered by good judgment, commercial sense and grasp of industry fundamentals. References available from a broad spectrum of professional disciplines.

Eric A. Hillerman

7200 Dallas Parkway #0935
Plano, Texas 75024
(c) 918-704-7202
eric@oilesquire.com

High level legal and business leader with record of delivering exceptional legal and business results

- Trustworthy counsel with strategic mind and ability to refine legal issues and place in proper risk management context melding both legal and business experience
- History of leading and elevating performance of both legal and business teams by building culture of execution, teamwork, alignment, and use of technology
- Unique experience in forming and leading highly successful special development teams requiring cooperation and teamwork among engineering, land, regulatory, and business strategy groups
- Exceptionally broad experience in commercial law and litigation including, large acquisitions and divestitures, complex litigation, midstream agreements, firm transportation, master service agreements, regulatory, and title

Professional Experience

Law Practice of Darrell R. Jones, PLLC

-Counsel: 3/22-Present

- provide advice and consulting on select oil and gas legal issues

East Shore Investments LLC:

-General Counsel: 4/19-Present

- execute all risk management, contracts, legal and land functions for oil and gas investment company

Newfield Exploration Company (S&P 500 Company):

-Vice-President Land: 7/16 to 2/19 (until merger with Ecana Corporation now Ovintiv)

- transformed Land department from several independent teams with separate standards, processes, and cultures to one high performing, aligned, and supportive department

- drove enormous upgrade of land data quality and accessibility, land processes, and use of technology across Land and Land Admin organizations

- lead Land department to new level of influence in driving deal flow and streamlining execution and collaboration with both legal and commercial development teams

- Deputy General Counsel: 7/15 to 6/16

- Associate General Counsel: 6/13-6/15

- lead team of all on-shore E&P and A&D lawyers; tenure highlights included multiple billions in A&D, joint venture commitments as well as large midstream dedication agreements

- ultimate manager of all company litigation; tenure included successful arbitrations of major litigation, obtaining dismissal or positive resolution of class action claims, and implementation of goals that significantly reduced company case count

- intimate working relationship with executive leadership, personal recruitment of new lawyers, and accelerated development of young legal talent

Newfield Exploration Mid-Continent Inc.:

- Legal Counsel & Assistant Corporate Secretary: 8/06-6/13

- active member of and counsel to mid-continent divisional management team during most accelerated growth period in company history including development of Anadarko and Arkoma basins

- built and lead legal team which managed all legal needs for division including oil and gas operational, A&D, midstream, regulatory, real estate, employment, water management and recycling, and litigation

- participated in company legislative projects including protection of horizontal tax credits and energy litigation reform act

- Newfield Appalachia LLC-directed company legal activities in Pennsylvania primarily relating to multi-state administrative bodies, local regulatory entities, and activist environmental groups

- Oil and Gas Marketing Supervisor (9/09-9/12) and Records Management Supervisor (9/12-6/13):

- provided strategic direction to mid-con oil and gas marketing team of six professionals which included restructuring of long term gas supply agreements and reaching arrangement with oil transporter for special bobtail truck project which drastically reduced oil inventory

- supervised and provided strategic direction to mid-con records management team and staff of 12 records professionals

Sprouse, Shrader, Smith P.C.: Shareholder (1996-2006); Associate (1990-1996) multi-state oil and gas practice representing major and large independent energy companies in both litigation and transactional matters; won several significant cases including appeals to the Texas Supreme Court: *Anadarko Petroleum Company v. Thompson*, 94 S.W.3d 550 (Tex. 2002) (lease termination case), *Natural Gas Clearinghouse v. Midgard Energy Company*, 113 S.W. 3d 400 (Tex. App.-Amarillo 2003) (multi-million dollar award relating to a gas purchase contract), *Anadarko Petroleum Company v. Krabbe*, 46 S.W. 3d 308 (Tex. App.- Amarillo 2001) (lease termination case) and, *Taylor v. Brigham Oil & Gas L.P.*, 2002 WL 58423 (Tex. App.- Amarillo 2002) (seismic operations/trespass)

Education & Admissions

Rice University-Jones School of Business: Advanced Management Program

University of Oklahoma: J. D.

Oklahoma State University: B.S. (Guy R. Donnell Scholarship)

State Bar of Texas

Oklahoma Bar Association

Industry Activities

Member of HLMA- industry group of VP level land professionals from select companies (2016-2019)

OKC ADAM (A&D Group)-Speaker October 23rd, 2018

Legal Committee Member for Oklahoma Mid-Continent Oil and Gas Association

Legal Committee Member for Oklahoma Independent Producer's Association

Oklahoma Mineral Law Section

Oil, Gas and Mineral Law Section of Texas Bar Association

Houston Bar Association Energy and Mineral Law Section

Other Management and Leadership Experience

Newfield Benefits Plan Committee (selected by NFX Executive leadership)

Newfield Vision Team (selected by NFX Executive leadership)

Past Chairman of the Board to Better Business Bureau of Amarillo

Civic Activities

EXHIBIT F-5



Ahuja & Consultants, Inc.

Certified Public Accountants

Ahuja & Clark Staff Supporting Fee Application

Arti Kathiriya

Arti serves as tax support for this engagement. Arti has over 6+ years of accounting and tax experience including multiple years as reviewer in public accounting. She has a knowledge of financial accounting, financial reporting, tax compliance of federal, state and international filing.

Devon Kwande

Devon serves as tax support staff for this engagement. Devon joined A&C in 2023 as a tax manager. He specializes in tax and has done so for more than 5 years. Devon is also a Certified Public Accountant.

Divya Shetty

Divya serves as accounting and tax support staff for this engagement. She specializes in accounting and auditing and has done so exclusively for 8 years. As noted above, Divya is a Certified Public Accountant.

Jeanne-Marie Blevins

Jeanne-Marie serves as accounting support staff for this engagement. Jeanne-Marie is highly skilled in data analytics, is extremely detail-oriented and has 10 years of accounting experience. Jeanne-Marie has supported multiple other forensic projects.

Jessica Hall

Jessica Hall serves as tax support staff for this engagement. Jessica has a little over 3 years of tax experience and has joined A&C as an associate.

Jennifer Wallace

Jennifer Wallace serves as accounting support staff for this engagement. Jennifer is highly skilled in accounting and data analytics, is extremely detail-oriented with a master's degree in accounting.

EXHIBIT F-6

Daniel McElhinney

As Managing Director, Daniel McElhinney brings more than 20 years of corporate restructuring expertise, operational insight, and case-management know-how to his role. While an attorney at Willkie Farr & Gallagher LLP, his representative experience in complex restructuring matters include Converse, Inc., Maxxim Medical Group, Inc., and Classic Communications, Inc. Building on his subject-matter expertise, Dan was the co-founder of the market's leading firm specializing in analyzing, pursuing, and defending preference actions. Previously Dan was a law clerk to the Honorable Arthur J. Gonzalez, former Chief Bankruptcy Judge in the Southern District of New York.

Robert Saraceni

With over forty years of diverse accounting and financial-restructuring experience, Robert Saraceni brings considerable knowledge to his role of Director of Operations. As an integral part of Stretto's Recovery Services Team, he assists clients in navigating complex engagements to maximize recoveries. Bob's focus is on overseeing data gathering, due diligence, defense analysis, and support required to pursue or defend preference actions. Drawing on decades of claims-administration operations expertise, Bob has been involved in numerous high-profile cases, including Lehman Brothers Holdings, Inc., Puerto Rico Electric Power Authority (PREPA), Delta Air Lines, Inc., Enron Corporation, and WorldCom. Prior to joining Stretto, Bob served as Managing Director at Acumen Recovery Services LLC, and Director of Claims Administration at Jamesway Corporation, Petrie Retail, and Joan & David.

Kevin Wasserman

Kevin Wasserman is a skilled associate specializing in managing all aspects of administrative operations in matters pertaining to preference analysis, recovery, and defense. Before joining Stretto, Kevin worked at Acumen Recovery Services, LLC, the predecessor firm to Stretto's Recovery Services Group. There he assisted on several notable preference recovery and defense matters, including Sears Holdings Corporation, High Ridge Brands, Inc., and Charming Charlie, LLC., where he managed the administrative operations.

Daniel Ramirez

Daniel Ramirez is a dedicated associate with over 5 years of corporate restructuring experience. His problem-solving approach and operational experience greatly contribute to his effectiveness. Previously, Daniel worked on several notable preference recovery and defense matters while at Acumen Recovery Services, LLC, the predecessor to Stretto's Recovery Services group, including Sears Holdings Corporation, High Ridge Brands, Inc., and Charming Charlie, LLC.

Sheryl Betance

In her role as Senior Managing Director, Sheryl keeps Stretto's Corporate-Restructuring Teams focused on claims and noticing operations and consultative services. With over 20 years of significant industry experience, she understands the right combination of internal resources is crucial to seamless case-management and has a deft approach when making case assignments. She is hands-on with professional development, offering one-on-one training and collaborating with her team members to develop and implement standard procedures that maximize efficiency. Sheryl is respected by her colleagues as an industry veteran and expert on designing streamlined infrastructure to ensure the highest levels of department productivity. She is an active member of ABI and IWIRC.

Melissa Membrino

In her role as Director of Operations, Melissa oversees the administrative-operations and legal-noticing teams supporting Stretto's Chapter 11 and Chapter 7 business solutions. She brings over 15 years of subject-matter expertise with a particular focus on workflow efficiency, corporate-change initiatives, and project management. Working with clients across various sectors, Melissa leverages her extensive bankruptcy-industry experience to identify and implement process efficiencies so busy turnaround professionals can focus on more substantive case issues. Junior colleagues rely on her hands-on leadership and deft approach to professional development. While directing a skilled team of full-service operators, Melissa also manages third-party provider and vendor relationships, cultivating Stretto's robust network of industry partnerships.

Aimee Marshall

In her Role as Quality Assurance Associate, in Production, Aimee Jis responsible for managing and maintaining production printers and inserters to produce quality mail pieces meeting all client requirements, postal regulations, and Stretto standards protecting the integrity of all confidential information.

Stephanie Morales

In her role as Intake Specialist in Operations, Stephanie is responsible for providing administrative support services including scanning and inputting data for ballots, claims, returned mail and any other documentation.

Ricky Quang

In his role as Print Production Associate, in Production, Ricky is responsible for managing and maintaining production printers and inserters to produce quality mail pieces meeting all client requirements, postal regulations, and Stretto standards protecting the integrity of all confidential information.

Naomi Rodriguez

In her role as Print Production Associate, in Production, Naomi is responsible for managing and maintaining production printers and inserters to produce quality mail pieces meeting all client requirements, postal regulations, and Stretto standards protecting the integrity of all confidential information.

Charles Wheeler

In his role as Senior Production Associate, Charles is responsible for managing and maintaining production printers and inserters to produce quality mail pieces meeting all client requirements, postal regulations, and Stretto standards protecting the integrity of all confidential information.

Jose Cruz

In his role as Print Production Associate, in Production, Jose is responsible for managing and maintaining production printers and inserters to produce quality mail pieces meeting all client requirements, postal regulations, and Stretto standards protecting the integrity of all confidential information.

Laura Tondreault

In her role as Intake Specialist in Operations, Laura is responsible for providing administrative support services including scanning and inputting data for ballots, claims, returned mail and any other documentation.

Staphany Alcantar

Stephany Alcantar is an Intake Specialist in Operations responsible for review and input of incoming claims, processing, scanning and uploading claims to the case management system.

standards protecting the integrity of all confidential information.

Jason Bouzos

In his role as Senior Associate, Jason facilitates all aspects of treasury and cash management services for trustees, receivers, and other fiduciaries. Jason is responsible for establishing, managing, and reconciling depository accounts, facilitating disbursements, and generating claims-distribution reports.

Jenice Alduenda

In her role as Director, Jenice is responsible for fostering strong relationships with a network of UST-approved banks, ensuring that clients are able to navigate complex engagements while maintaining regulatory compliance. Jenice has been instrumental in developing processes in collaboration with banking partners that enable fiduciaries to manage disbursement processes and account reconciliations at any scale.

Micheal Hale

In his role as Manager, Jason facilitates all aspects of treasury and cash management services for trustees, receivers, and other fiduciaries. Jason is responsible for establishing, managing, and reconciling depository accounts, facilitating disbursements, and generating claims-distribution reports.

Ruben Guevara

In his role as Senior Associate, Ruben facilitates all aspects of treasury and cash management services for trustees, receivers, and other fiduciaries. Jason is responsible for establishing, managing, and reconciling depository accounts, facilitating disbursements, and generating claims-distribution reports.

Morgan Wisbey

An industry veteran with nearly 20 years of experience, Morgan brings tremendous insight and leadership to his role as Director. He is responsible for developing and implementing department procedures, so Stretto's operational infrastructure is designed to ensure optimal productivity for busy turnaround advisors. Throughout his long career at the company, he has been instrumental in the growth and expansion of our suite of corporate-restructuring solutions, and identifying other services that would benefit fiduciaries. Drawing on his background in the technology sector, Morgan works closely with our Product Development Team to offer guidance and suggestions on software enhancements geared toward improved workflow. Leveraging established relationships with a national network of professional advisors to better understand unique needs and priorities, Morgan has played an integral role in creating and refining our approach to case-management support, cementing Stretto's position as the market leader amongst client-service partners.

Stephen Cady

Stephen brings significant corporate-restructuring, receivership, and claims-administration expertise to his role as Director. With particular skill in project management and effective client collaboration, he routinely facilitates the development of automated workflows for challenging case-management operations. As a former Attorney with strong data analysis aptitude, Stephen negotiates legal and technical requirements to establish efficient processes. Clients value him for his attention-to-detail and ability to meet even the most stringent deadlines while consistently going above-and-beyond to get the job done. Stephen has been involved in numerous high-profile Chapter 11 cases, including Westinghouse Electric, Mahwah Bergen (Ascena Retail Group), and Neiman Marcus Group, as well as distributions for numerous post-confirmation and regulatory enforcement actions.

Antonio Rubio

In his role as Print Production Associate, in Production, Antonio is responsible for managing and maintaining production printers and inserters to produce quality mail pieces meeting all client requirements, postal regulations, and Stretto standards protecting the integrity of all confidential information.