

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
JULY 1, 2024 AND SEPTEMBER 30, 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 July 1, 2024 and September 30, 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”), Vicki Palmour Consulting, LLC (“Palmour”), 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 *Receiver’s Twelfth Quarterly Report for Receivership Estates (July 1, 2024 – September 30, 2024)* [ECF No. 601] (the “Twelfth 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 obtained Court approval of the “Net Investment” or “Net Loss” distribution methodology and plan on July 1, 2024. *See* ECF Nos. 559, 560. 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 resolved the Railroad Commission of Texas (“RRC”) claims in this Case; prepared final reporting for submission to the Texas Comptroller of Public Accounts (the “Comptroller”); and engaged a Fort Worth-based auctioneer to conduct a public auction of the remaining known personal property pursuant to Court-approved procedures. The Receiver engaged a third-party escheat vendor to commence the escheatment process with the Comptroller, which was completed during the Application Period (as defined below). A substantial amount of time was spent in the third quarter of 2024 on the Court-approved claims

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

procedure, focusing on communications with various creditors, including investors (potential and known), vendors, and governmental agency contacts, and claims analysis and allowance and/or objection, as appropriate. The Receiver also obtained Court approval of the settlement of certain claims and causes of action of certain Heartland-related Receivership Parties with respect to former counsel, Locke Lord LLP (“Locke Lord”), which benefits Heartland investors as a “return of capital”. The Receiver formulated and proposed a distribution methodology and plan for Court approval, which was obtained on July 1, 2024, after notice and hearing.

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 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, Ahuja’s hours decreased from 372.60 hours in the second quarter of 2024 to 189.60 hours in this Application Period; the Receiver’s hours decreased from 206.00 in the second quarter of 2024 to 121.80 hours in this Application Period; Dykema’s hours decreased from 616.20 in the second quarter of 2024 to 439.30 hours in this Application period. Dykema has voluntarily reduced the requested reimbursement by \$17,995.65, including time spent by the Receiver and by Dykema attorneys during the Application Period.

5. At the beginning of the third quarter of 2024, the Receiver had \$18,755,092.14 on deposit. At the end of the third quarter of 2024, the amount on deposit was \$9,222,154.03 after the September 11, 2024 distribution (“Initial Distribution”), receipt of proceeds from settlements and payments of operating expenses and Court-approved fees and expenses. As of the filing of this Application (November 1, 2024), 5,784,024.97 is in the Receivership bank accounts.³

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 July 1, 2024 through September 30, 2024 (the “Application Period”), by the Receiver in the amount of \$82,215.00 for fees; Dykema, as lead counsel to the Receiver, in the amount of \$138,443.95 for fees and in the amount of \$10,166.55 for expenses; Romero, as local counsel to the Receiver, in the amount of \$382.50 for fees; Jones, as oil and gas transactional counsel to the Receiver, in the amount of \$2,697.50 for fees; Palmour, as oil and gas consultant to the Receiver, in the amount of \$850.00 for fees; Ahuja, as tax and forensic accountants to the Receiver, in the amount of \$45,214.50 for fees; and Stretto, as claims and disbursement agent to the Receiver, in the amount of \$36,292.25 for fees and in the amount of \$3,031.31 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 July 1, 2024 through September 30, 2024.

³ The Receiver has set aside approximately \$2,690,000 for the October 17th distribution.

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, Palmour, 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 second quarter of 2024, the Receiver, Dykema, Romero, Palmour, 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].

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.

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.

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 January 11, 2022, the Receiver filed her *Application to Employ Vicki Palmour Consulting, LLC as Oil and Gas Consultant to Receiver Effective as of January 1, 2022* [ECF No. 98] (the “Palmour Application”).

23. After considering the Palmour Application at the January 19, 2022 hearing, this Court entered the Palmour Employment Order [ECF No. 106].

24. 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”).

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

26. 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”).

27. 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

28. 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.

29. 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 the Twelfth Report [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.

30. 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 September 11, 2024 and October 17, 2024 disbursement; assisting the Receiver with mitigation of risks; issuing escheat reports to the Comptroller with the assistance of the escheat vendor and Palmour; and responding to a substantial number of investors, other creditors, and federal and state governmental agency inquiries, particularly relating to the claims procedure and related notices, including transaction schedules for known investors, distribution methodology and plan, and settlement with Locke Lord. 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.

31. 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.

32. Jones's services rendered during the Application Period included supervision of the farmout process; coordination with the escheatment contractor; and communications with the Receiver and Dykema regarding post-abandonment issues.

33. Palmour's services rendered during the Application Period included preparing and reconciling suspense reports for the escheatment process.

34. 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") and other governmental authorities; assisting the Receiver's counsel throughout the claims procedure, including confirming receipt of investors' funds and responding to specific investor inquiries on claim submissions; performing detailed analysis of fund transfers and use of funds from Barron Petroleum LLC; analyzing which entities under receivership can be closed or dissolved; and tracing funds relating to the purchase of the Bahamas properties and preparing documentation on same.

35. 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 W-9s of investor and non-investor creditors; serving various notices, claim forms, non-investor and/or investor claim packages (both known and potential), distribution pleading packages, and Locke Lord settlement pleading packages, and

other pleadings as requested by Dykema; and, creating distribution packages including processing checks to send to investor and non-investor creditors.

C. Fees and Expenses Summary During the Application Period

36. 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 439.30 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 \$138,163.95 and expenses incurred in connection with services performed on behalf of the Receiver during the Application Period total \$16,951.80.⁵

37. The Receiver expended an aggregate of 228.20 hours on this Case during the Application Period. The Receiver's fees for the Application Period total \$107,430.30

38. Romero reported an aggregate of 0.90 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 \$382.50. Romero did not incur any expenses during the Application Period.

39. 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.

40. Palmour expended an aggregate of 8.5 hours on this Case during the Application Period. Palmour's fees for the Application Period total \$850.00. Palmour did not incur any expenses during the Application Period.

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.

41. Ahuja expended an aggregate of 189.6 hours on this Case during the Application Period. Ahuja's fees for the Application Period total \$45,215.50.

42. Stretto expended an aggregate of 211 hours on this Case during the Application Period. Stretto's fees for the Application Period total \$36,292.25, and Stretto's expenses incurred in connection with services performed on behalf of the Receiver during the Application Period total \$3,031.31. Stretto's fees for the Application Period total \$39,323.56.

IV. RECORDS SUPPORTING THIS APPLICATION

43. No agreement or understanding, written or oral, express or implied, exists between Dykema, Romero, Jones, Palmour, 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.

44. The Receiver, Dykema, Romero, Jones, Palmour, 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.

45. All services performed by Dykema, Romero, Jones, Palmour, 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, Palmour's, Ahuja's, and Stretto's services have been substantial, necessary, and beneficial to the Receiver and the Receivership Estates.

46. Dykema, Romero, Jones, Palmour, 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.

47. In addition, Dykema, Romero, Jones, Palmour, 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 \$10,166.55 in expenses in connection with the rendition of services on behalf of the Receiver and Stretto incurred \$3,031.31 in expenses in connection with the rendition of services on behalf of the Receiver. The Receiver, Romero, Jones, and Palmour did not incur any expenses during the Application Period.

48. Attached hereto as **Exhibit E-1** is the invoice of Dykema. 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 Palmour during the Application Period. Attached hereto as **Exhibit E-5** is the invoice of Ahuja during the Application Period. Attached hereto as **Exhibit E-6** 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.

49. Dykema, Romero, Jones, Palmour, 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

50. 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

51. 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, Palmour, Ahuja, and Stretto and any expenses incurred during the Application Period.

52. 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).

53. 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.

54. 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, and the October 17, 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. Stretto continued to serve pleadings, claims procedure, Locke Lord settlement, and/or distribution pleading packages on investor and non-investor creditors in hard copy or via email as requested by Dykema during the Application Period. Ms. Behrends, Ms. Dominguez, Ms. Giltner, and Ms. Douglas spoke to approximately 519 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. Dykema continued to respond to correspondence from investors and non-investor creditors on the claims procedure and distribution plan during the Application Period. The number of disputed claims considered by the Court was reduced to 35.

55. 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, Palmour, 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.

56. 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.

57. 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, F-6, and F-7** for the Receiver, Dykema, Romero, Jones, Palmour, Ahuja, and Stretto, respectively.⁶

58. 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

⁶ By way of example, in the *Flexible Funding Ltd. Liability Co.* bankruptcy case currently 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 Forshey & Prostok, 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.

Receivership Estates while still accomplishing the tasks required of them. *See Johnson*, 488 F.2d at 718.

59. 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.

60. 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, Palmour'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

61. 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.

62. 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.

63. 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) Researching various distribution methodologies and formulating a proposed distribution plan for Court consideration and approval.

64. 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

65. 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

66. During the Application Period, Jones served as the Receiver's oil and gas transactional counsel in this Case. Jones assisted with the escheatment process and was point of contact regarding the farmout process. In addition, Jones communicated with the Receiver and Dykema throughout the Application Period regarding open post-abandonment issues in the Case.

Jones also worked with the escheat vendor and Dykema to complete the escheatment process with the Comptroller.

Palmour

67. During the Application Period, Palmour served as the Receiver's oil and gas consultant in this Case and was instrumental in preparing suspense reports for submission to the Comptroller. Palmour prepared documentation requested by the Receiver and/or her counsel to issue escheat reports to the Comptroller.

Ahuja

68. 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 preliminary potential exposure calculations and calculated current cash positions and expense allocations for various Receivership Parties.

69. With respect to forensic accounting, Ahuja provided responses to the Receiver's counsel on various disputed investor claim submissions and answered specific investment inquiries. Ahuja also supported the Receiver, her counsel, and Stretto by providing various financial information as part of the claims procedure. Ahuja also analyzed various distribution methodologies. Ahuja continued tracing funds relating to the purchase of the Bahamas properties as discussed above.

Stretto

70. 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 regarding the claims procedure and associated

forms and notices, maintained and continuously updated the claims database, reconciled claim submissions, and prepared reports for the Receiver and Dykema on same. Stretto also facilitated additional service of the claims packages to known non-investor creditors and investors (potential and known) and other pleadings, as requested. Further, Stretto facilitated service of the Locke Lord settlement and distribution pleading packages to the investor and non-investor matrices in this Case and the claims objection packages on disputed claimants. Stretto processed technical inquiries with respect to the claims database and submission of claims. Stretto continued to update investor contact information during the Application Period at the request of Dykema. Stretto also processed completed and signed IRS Form W-9s upon receipt from Dykema.

Fees and Expenses of Receiver's Retained Personnel

71. 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.

72. The Receiver, Dykema, Romero, Jones, Palmour, 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.

73. The chart below depicts the total fees and expenses requested by the Receiver, Dykema, Romero, Jones, Palmour, 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	121.80 hours	\$82,215.00	\$0.00
Dykema Gossett PLLC	439.30 hours	\$138,163.95	\$16,951.80
Law Offices of Romero Kozub	0.90 hours	\$382.50	\$0.00
Law Practice of Darrell R. Jones, PLLC	8.3 hours	\$2,697.50	\$0.00
Vicki Palmour Consulting, LLC	8.5 hours	\$850.00	\$0.00
Ahuja & Clark, PLLC n/k/a Ahuja & Consultants, Inc.	189.6 hours	\$45,214.50	\$0.00
Stretto, Inc.	211.0 hours	\$36,292.25	\$3,031.31

74. 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.

75. 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 \$3.175 million,⁷ exclusive of any recovery from additional settlements or any remaining personal property disposition.

⁷ This figure does not include any Court-approved distribution amounts for Class 4 and Class 5 allowed claimants.

VII. CONCLUSION

76. 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 \$182,215.00, (ii) all fees incurred by Dykema as counsel to the Receiver during the Application Period, totaling \$138,163.95 (iii) all fees incurred by Romero as counsel to the Receiver during the Application Period, totaling \$382.50, (iv) all fees incurred by Jones as oil and gas transactional counsel to the Receiver during the Application Period, totaling \$2,697.50, (v) all fees incurred by Palmour as oil and gas consultant to the Receiver during the Application Period, totaling \$850.00, (vi) all fees incurred by Ahuja as tax and forensic accountants to the Receiver during the Application Period, totaling \$45,214.50, and (vii) all fees incurred by Stretto as claims and disbursement agent to the Receiver during the Application Period, totaling \$36,292.25; (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 \$16,951.80, and (ii) all expenses incurred by Stretto in connection with services rendered as claims and disbursement agent to the Receiver during the Application Period, totaling \$3,031.31; (c) authorizing the Receiver to pay (i) all authorized outstanding fee amounts to Dykema, including the Receiver's fees, totaling \$220,375.95, (ii) all authorized outstanding fee amounts to Romero, totaling \$382.50, (iii) all authorized outstanding fee amounts to Jones, totaling \$2,697.50, (iv) all authorized outstanding fee amounts to Palmour, totaling \$850.00, (v) all authorized outstanding fee amounts to Ahuja, totaling \$45,215.50, and (vi) all authorized outstanding fee amounts to Stretto, totaling \$36,292.25; (d) authorizing the Receiver to pay (i) all authorized outstanding expenses of Dykema, totaling \$16,951.80 and (iii) all authorized outstanding expenses of Stretto, totaling \$3,031.31 and (e) awarding such other and further relief that this Court deems just and proper.

Dated: November 1, 2024

Respectfully submitted,

By: /s/ Deborah D. Williamson

Deborah D. Williamson

(Receiver)

State Bar No. 21617500

dwilliamson@dykema.com

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and

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Hurst, Texas 76053

Telephone: (682) 267-1351

and

Darrell R. Jones
State Bar No. 24029642
drj@oilesquire.com
**LAW PRACTICE OF
DARRELL R. JONES, PLLC**
5300 Memorial Drive, Suite 475
Houston, Texas 77007
Telephone: (832) 302-5373

COUNSEL TO RECEIVER

and

Vicki Palmour
VICKI PALMOUR CONSULTING, LLC
P.O. Box 1925
Graham, Texas 76450
Telephone: (940) 549-0131

**OIL AND GAS CONSULTANT
TO RECEIVER**

and

Madhu Ahuja
**AHUJA & CLARK, PLLC n/k/a
AHUJA & CONSULTANTS, INC.**
2901 N. Dallas Parkway, Suite 320
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 November 1, 2024, 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 Palmour'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) Palmour 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 Palmour justifiably purchased or contracted for from a third party, Palmour requests reimbursement only for the amount billed by the third-party vendor and paid for by Palmour 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/ Vicki Palmour

Vicki Palmour

Vicki Palmour Consulting, LLC

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

EXHIBIT B

**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

**ORDER APPROVING RECEIVER'S FEE APPLICATION FOR SERVICES PERFORMED
BETWEEN JULY 1, 2024 AND SEPTEMBER 30, 2024, AND BRIEF IN SUPPORT**

Before the Court is the *Fee Application for Services Performed Between July 1, 2024 and September 30, 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”); Vicki Palmour Consulting, LLC (“Palmour”); 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, Palmour, 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.

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

2. The Receiver's fees incurred during the Application Period are approved on an interim basis and allowed in the amount of **\$82,215.00**.

3. Dykema's fees incurred during the Application Period are approved on an interim basis and allowed in the amount of **\$138,163.95**.

4. Romero's fees incurred during the Application Period are approved on an interim basis and allowed in the amount of **\$382.50**.

5. Jones's fees incurred during the Application Period are approved on an interim basis and allowed in the amount of **\$2,697.50**.

6. Palmour's fees incurred during the Application Period are approved on an interim basis and allowed in the amount of **\$850.00**.

7. Ahuja's fees incurred during the Application Period are approved on an interim basis and allowed in the amount of **\$45,214.50**.

8. Stretto's fees incurred during the Application Period are approved on an interim basis and allowed in the amount of **\$36,292.25**.

9. 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 **\$10,166.55**.

10. 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 **\$3,031.31**.

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, Palmour, Ahuja, and Stretto from the available funds of the Receivership Estates.

SO ORDERED.

[_____] , 2024.

HAL R. RAY, JR.
UNITED STATES MAGISTRATE JUDGE

Prepared and submitted by:

Deborah D. Williamson

(Receiver)

State Bar No. 21617500

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and

Rose L. Romero

State Bar No. 17224700

Rose.Romero@RomeroKozub.com

LAW OFFICES OF ROMERO | KOZUB

235 N.E. Loop 820, Suite 310

Hurst, Texas 76053

Telephone: (682) 267-1351

and

Darrell R. Jones

State Bar No. 24029642

drj@oilesquire.com

LAW PRACTICE OF

DARRELL R. JONES, PLLC

5300 Memorial Drive, Suite 475

Houston, Texas 77007

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	121.80 hours	\$675.00	\$82,215.00

Dykema Gossett PLLC

<u>TIMEKEEPER</u>	<u>TITLE</u>	<u>HOURS</u>	<u>HOURLY RATE</u>	<u>TOTAL FEES</u>
Behrends, Danielle Rushing	Member	190.20 hours	\$350.00	\$66,570.00
Cumming, Michael G.	Member	2.70 hours	\$648.00	\$1,749.60
Dominguez, Alanna M.	Associate	77.4 hours	\$330.00	\$25,542.00
Douglas, Dominique A.	Associate	13.40 hours	\$330.00	\$4,422.00
Dick, Theresa E.	Paralegal	155.30 hours	\$256.50	\$39,834.45
Flores, Vicki	Paralegal	0.30 hours	\$153.00	\$45.90

Law Offices of Romero | Kozub

<u>TIMEKEEPER</u>	<u>HOURS</u>	<u>HOURLY RATE</u>	<u>TOTAL FEES</u>
Rose L. Romero	0.90 hours	\$425.00	\$382.50

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

Vicki Palmour Consulting, LLC

<u>TIMEKEEPER</u>	<u>HOURS</u>	<u>HOURLY RATE</u>	<u>TOTAL FEES</u>
Amy Amburn	12.00 hours	\$100.00	\$1,200.00

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	12.60 hours	\$325.00	\$4,095.00
Blevins, Jeanne-Marie	7.30 hours	\$120.00	\$876.00
Bremer, Carolyn	41.10 hours	\$325.00	\$13,357.50
Hall, Ammon	6.80 hours	\$120.00	\$816.00
Huser, Stacey	37.30 hours	\$250.00	\$9,325.00
Kathiriya, Arti	1.60 hours	\$180.00	\$288.00
Shetty, Divya	38.30 hours	\$250.00	\$9,575.00
Toeteberg-Harms, Natasha	25.50 hours	\$180.00	\$4,590.00
Wallace, Jennifer	19.10 hours	\$120.00	\$2,292.00

Stretto, Inc.⁹

<u>TIMEKEEPER</u>	<u>HOURS</u>	<u>HOURLY RATE</u>	<u>TOTAL FEES</u>
Alcantar, Staphany	0.40	\$40.00	\$16.00
Alduenda, Jenice	8.70	\$175.00	\$1,522.50
Aragon, Pauline	0.30	\$30.00	\$9.00
Aragon, Pauline	2.00	\$65.00	\$130.00
Arellano, Monica	0.20	\$65.00	\$13.00
Betance, Sheryl	1.20	\$210.00	\$252.00
Bouzos, Jason	6.10	\$165.00	\$1,006.50
Bribiesca, David	2.00	\$130.00	\$260.00
Cady, Stephen	14.10	\$205.00	\$2,890.50
Chachaqua, Alberto	0.50	\$65.00	\$32.50
Chachaqua, Alberto	0.20	\$130.00	\$26.00
Cruz, Jose	0.10	\$65.00	\$6.50
Delgado, Stephanie	0.20	\$130.00	\$26.00
Guevara, Ruben	7.70	\$135.00	\$1,039.50
Hale, Micheal	17.40	\$135.00	\$2,349.00
IT Staff	0.50	\$165.00	\$82.50
Marshall, Aimee	0.20	\$65.00	\$13.00
Marshall, Aimee	0.40	\$130.00	\$52.00
Membrino, Melissa	2.10	\$185.00	\$388.50
Morales, Stephanie	2.80	\$40.00	\$112.00
Quang, Ricky	0.50	\$65.00	\$32.50
Ramirez, Daniel	1.00	\$130.00	\$130.00
Rodriguez, Naomi	1.40	\$65.00	\$91.00
Saraceni, Robert	109.50	\$185.00	\$20,257.50
Segura, Casandra	0.60	\$30.00	\$18.00
Streseman, Kevin	0.80	\$185.00	\$148.00
Tondreault, Laura	1.10	\$50.00	\$55.00
Turner, Felicia	0.10	\$97.50	\$9.75
Wheeler, Charles	0.10	\$65.00	\$6.50
Wheeler, Charles	0.20	\$130.00	\$26.00
Wisbey, Morgan	28.60	\$185.00	\$5,291.00
TOTALS:	211.00		\$36,292.25

⁹ Increased hourly rates for Stretto's professionals represent personnel promotions during the Application Period.

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	\$22,207.50	32.90 hours
Asset Analysis and Recovery	\$270.00	0.40 hours
Asset Disposition	\$8,370.00	12.40 hours
Business Operations	\$6,615.00	9.80 hours
Tax Issues	\$8,707.50	12.90 hours
Claims Administration and Objection	\$31,320.00	46.40 hours
Status Reports	\$1,957.50	1.50 hours
Litigation Consulting	\$2,767.50	4.10 hours
TOTAL	\$82,215.00	121.80 hours

Dykema Gossett PLLC

<u>Category Description</u>	<u>Total Billable Amount</u>	<u>Total Billable Time</u>
Case Administration ¹⁰	\$96,857.35	323.10 hours
Asset Analysis and Recovery	\$980.00	2.80 hours
Asset Disposition	\$10,949.80	31.20 hours
Business Operations	\$14,350.00	41.00 hours
Tax Issues	\$7,354.80	18.80 hours
Claims Administration and Objection	\$4,277.00	12.70 hours
Status Reports	\$3,185.00	9.10 hours
Litigation Consulting	\$210.00	0.60 hours
TOTAL	\$138,163.95	439.30 hours

Law Offices of Romero | Kozub

<u>Category Description</u>	<u>Total Billable Amount</u>	<u>Total Billable Time</u>
Case Administration	\$382.50	0.90 hours
TOTAL	\$382.50	0.90 hours

¹⁰ 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 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

Vicki Palmour Consulting, LLC

<u>Category Description</u>	<u>Total Billable Amount</u>	<u>Total Billable Time</u>
Accounting Work	\$850.00	8.50 hours
TOTAL	\$850.00	8.50 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	\$10,627.00	53.70 hours
Tax Issues	\$13,608.00	52.00 hours
Forensic Accounting	\$20,979.50	83.90 hours
TOTAL	\$45,214.50	189.6 hours

Stretto, Inc.

<u>Category Description</u>	<u>Total Billable Amount</u>	<u>Total Billable Time</u>
Case Administration	\$34,735.75	202.20 hours
Claims Administration and Objections	\$1,556.50	8.80 hours
TOTALS:	\$36,292.25	211.00 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

AUGUST 27, 2024
MATTER #: 122686.000001
INVOICE #: 3606552

FOR PROFESSIONAL SERVICES RENDERED

RE: RECEIVER'S TIME

FEES	\$	24,570.00
INVOICE TOTAL	\$	24,570.00



DEBORAH D WILLIAMSON
DEBORAH WILLIAMSON

MATTER #: 122686.000001
INVOICE #: 3606552
PAGE 2

AUGUST 27, 2024

RE: RECEIVER'S TIME

DATE	ID	DESCRIPTION	TASK	HOURS	AMOUNT
07/01/24	DDW	REVIEW OF ORDERS APPROVING PROPOSING FINDINGS OF FACT AND CONCLUSIONS OF LAW AND RELATED ORDERS; DRAFT AND RESPOND TO EMAILS REGARDING SAME.	B310	1.00	675.00
07/02/24	DDW	MULTIPLE CONFERENCES AND EMAILS REGARDING VARIOUS IRS ISSUES.	B240	1.90	1,282.50
07/02/24	DDW	CONFERENCE REGARDING DISTRIBUTIONS TO FEEDER FUNDS AND/OR INVESTMENT ADVISORS; REVIEW OF COMMUNICATIONS REGARDING SAME.	B130	0.90	607.50
07/02/24	DDW	CONFERENCES REGARDING SERVICE OF ORDERS AND OTHER ISSUES.	B110	0.30	202.50
07/03/24	DDW	REVISE FAQ; DRAFT AND RESPOND TO EMAILS REGARDING SAME.	B110	0.90	607.50
07/08/24	DDW	PREPARE FOR AND ATTEND CONFERENCE WITH SEC.	B110	0.90	607.50
07/08/24	DDW	REVIEW OF ANALYSIS REGARDING RENEWAL OF INSURANCE AND RELATED EMAILS.	B210	0.50	337.50
07/08/24	DDW	REVIEW AND EXECUTE TITLES REGARDING VEHICLE AND TRAILER; CONFERENCE WITH MS. BEHREND'S REGARDING SAME.	B130	0.80	540.00
07/08/24	DDW	REVIEW AND REVISE FAQ'S, CONFERENCE REGARDING SAME.	B110	1.10	742.50
07/08/24	DDW	REVIEW OF CORRESPONDENCE AND COMPLAINTS FROM TEXAS RAILROAD COMMISSION.	B210	0.40	270.00
07/09/24	DDW	REVIEW AND RESPOND TO MULTIPLE EMAILS REGARDING CALCULATION OF DISTRIBUTION AMOUNTS.	B130	0.80	540.00
07/11/24	DDW	COMMUNICATE WITH INVESTOR REGARDING VARIOUS ISSUES.	B110	0.40	270.00
07/11/24	DDW	PREPARE FOR AND ATTEND MEETING WITH AHUJA & CONSULTANTS.	B240	0.60	405.00
07/11/24	DDW	REVIEW AND APPROVE QUARTERLY REPORTS (FINANCIAL).	BT155	0.50	337.50
07/12/24	DDW	REVIEW AND RESPOND TO ISSUES RELATED TO CALCULATIONS OF DISTRIBUTIONS AND OTHER RELATED ISSUES.	B130	0.50	337.50
07/15/24	DDW	COMMUNICATIONS WITH INVESTORS.	B110	0.50	337.50
07/16/24	DDW	REVISE QUARTERLY REPORT; DRAFT AND RESPOND TO EMAILS REGARDING SAME.	BT155	1.80	1,215.00



DEBORAH D WILLIAMSON
DEBORAH WILLIAMSON

MATTER #: 122686.000001
INVOICE #: 3606552
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AUGUST 27, 2024

DATE	ID	DESCRIPTION	TASK	HOURS	AMOUNT
07/17/24	DDW	REVIEW AND APPROVE PAYMENTS AND TERMINATION OF SERVICES.	B210	0.70	472.50
07/17/24	DDW	CONFERENCE WITH MS. BEHREND'S REGARDING STATUS OF MULTIPLE ISSUES INCLUDING QUARTERLY REPORT, AUCTION AND OTHER ISSUES.	B110	0.90	607.50
07/17/24	DDW	REVIEW AND APPROVE QUARTERLY REPORT.	BT155	0.60	405.00
07/17/24	DDW	REVIEW AND APPROVE PAYEE INFORMATION.	B210	0.40	270.00
07/17/24	DDW	REVIEW OF UPDATE REGARDING CLAIMS DISTRIBUTION AND EXECUTION OF W-9S.	B130	0.40	270.00
07/18/24	DDW	REVIEW AND APPROVE UPDATE REGARDING STORAGE UNITS.	B210	0.40	270.00
07/18/24	DDW	REVIEW AND APPROVE PAYMENTS.	B210	0.30	202.50
07/18/24	DDW	REVIEW AND EXECUTE POAS FOR TAX TRANSCRIPTS AND/OR RETURNS.	B240	0.90	607.50
07/19/24	DDW	REVIEW AND APPROVE REQUESTS TO DISCLOSE CERTAIN DISTRIBUTIONS TO GOVERNMENTAL AGENCIES.	B110	0.40	270.00
07/19/24	DDW	REVIEW AND APPROVE INSURANCE RENEWAL AND PREMIUMS.	B210	0.80	540.00
07/19/24	DDW	REVIEW AND RESPOND TO UPDATES REGARDING WELL LOGS.	B210	0.30	202.50
07/22/24	DDW	REVIEW AND REVISE PROPOSED SUMMARY OF CLAIMS AND DISTRIBUTION AMOUNTS FOR WEBSITE/FAQS; DRAFT AND RESPOND TO EMAILS REGARDING SAME.	B130	1.00	675.00
07/22/24	DDW	REVIEW OF RESULTS OF AUCTION; DRAFT AND RESPOND TO EMAILS REGARDING SAME.	B130	0.40	270.00
07/22/24	DDW	APPROVE OF DELIVERY OF DOCUMENTS TO TEXAS RAILROAD COMMISSION AND TERMINATION OF LEASES.	B210	0.60	405.00
07/23/24	DDW	MULTIPLE EMAILS REGARDING DISTRIBUTIONS INCLUDING PROPOSED NOTICES TO BE PUBLISHED ON WEBSITE, AND OTHER ISSUES.	B130	1.10	742.50
07/23/24	DDW	REVIEW AND REVISE CORRESPONDENCE REGARDING DISTRIBUTIONS TO CERTAIN INVESTORS AND GOVERNMENT INQUIRIES.	B130	1.40	945.00
07/23/24	DDW	BRIEF REVIEW OF INFORMATION REGARDING TORONTO DOMINION BANK.	B120	0.40	270.00
07/24/24	DDW	CONFERENCES AND EMAILS REGARDING NOTICES AND DISTRIBUTIONS (INCLUDING TAX LANGUAGE).	B130	0.90	607.50
07/24/24	DDW	CONFERENCES AND EMAILS REGARDING ACCOUNTS (CHARGES	B210	0.90	607.50



DEBORAH D WILLIAMSON
DEBORAH WILLIAMSON

MATTER #: 122686.000001
INVOICE #: 3606552
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AUGUST 27, 2024

DATE	ID	DESCRIPTION	TASK	HOURS	AMOUNT
		AND CREDITS) AND DEPOSITS (CANADIAN AND OTHERS).			
07/25/24	DDW	COMMUNICATIONS REGARDING W-9S AND OTHER DISTRIBUTIONS ISSUES.	B310	0.50	337.50
07/25/24	DDW	REVISE COVER LETTER FOR DISTRIBUTIONS AND COMMUNICATIONS REGARDING SAME.	B130	0.90	607.50
07/25/24	DDW	COMMUNICATIONS REGARDING SALE OF EQUIPMENT AND AUCTION EXPENSES.	B130	0.40	270.00
07/26/24	DDW	REVIEW OF REPORT FROM AUCTION AND FILINGS.	B130	0.60	405.00
07/26/24	DDW	COMMUNICATIONS REGARDING DISPOSITION OF FILES AND PAYMENT OF RELATED EXPENSES.	B210	0.90	607.50
07/26/24	DDW	COMMUNICATIONS AND DECISIONS REGARDING PAYMENTS	B210	0.90	607.50
07/26/24	DDW	REVIEW OF FAQ AND OTHER COMMUNICATIONS.	B110	0.60	405.00
07/29/24	DDW	MULTIPLE COMMUNICATIONS REGARDING W-9S, PAYMENTS AND OTHER ISSUES.	B210	1.00	675.00
07/29/24	DDW	REVIEW AND APPROVE PAYMENTS.	B210	0.50	337.50
07/29/24	DDW	BRIEF REVIEW OF MAIL FROM TEXAS RAILROAD COMMISSION.	B210	0.40	270.00
07/30/24	DDW	PREPARE FOR AND ATTEND CONFERENCE WITH STRETTO REGARDING STATUS OF DISTRIBUTIONS AND OTHER ISSUES.	B130	0.80	540.00
07/30/24	DDW	REVIEW AND REVISE LETTER TO CLAIMANTS REGARDING W-9 AND DISTRIBUTIONS.	B130	0.60	405.00
07/30/24	DDW	REVIEW OF SUMMARY OF NET TRANSACTION AMOUNTS AND OTHER INFORMATION RELATED TO ISSUANCE OF DISTRIBUTION PAYMENTS.	B130	0.90	607.50
07/30/24	DDW	ADDRESS ISSUES REGARDING BANK ACCOUNTS, INTEREST AND OTHER ISSUES.	B210	0.40	270.00
07/31/24	DDW	REVIEW OF UPDATE REGARDING FARMOUT; DRAFT AND RESPOND TO EMAILS REGARDING SAME.	B210	0.40	270.00
TOTAL				36.40	\$24,570.00



DEBORAH D WILLIAMSON
DEBORAH WILLIAMSON

MATTER #: 122686.000001
INVOICE #: 3606552
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AUGUST 27, 2024

BILLING SUMMARY					
ID	TIMEKEEPER	TITLE	HOURS	RATE	AMOUNT
DDW	DEBORAH WILLIAMSON	MEMBER	36.40	675.00	24,570.00
TOTAL			36.40		\$24,570.00



DEBORAH D WILLIAMSON
DEBORAH WILLIAMSON

MATTER #: 122686.000001
INVOICE #: 3606552
PAGE 6

AUGUST 27, 2024

TASK SUMMARY

TASK	TASK DESCRIPTION	HOURS	AMOUNT
B110	CASE ADMINISTRATION	6.00	4,050.00
B120	ASSET ANALYSIS AND RECOVERY	0.40	270.00
B130	ASSET DISPOSITION	12.40	8,370.00
B210	BUSINESS OPERATIONS	9.80	6,615.00
B240	TAX ISSUES	3.40	2,295.00
B310	CLAIMS ADMINISTRATION & OBJECT	1.50	1,012.50
BT155	STATUS REPORTS	2.90	1,957.50
TOTAL		36.40	24,570.00



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

OCTOBER 31, 2024
MATTER #: 122686.000001
INVOICE #: 3613586

FOR PROFESSIONAL SERVICES RENDERED

RE: RECEIVER'S TIME

FEES	\$	27,675.00
INVOICE TOTAL	\$	27,675.00



DEBORAH D WILLIAMSON
DEBORAH WILLIAMSON

MATTER #: 122686.000001
INVOICE #: 3613586
PAGE 2

OCTOBER 31, 2024

RE: RECEIVER'S TIME

DATE	ID	DESCRIPTION	TASK	HOURS	AMOUNT
08/05/24	DDW	PREPARE FOR AND ATTEND CONFERENCE AND EMAILS REGARDING TAX AND ACCOUNTING ISSUES.	B240	0.50	337.50
08/05/24	DDW	REVIEW AND APPROVE DISTRIBUTION TO ESTATE AND FORMS OF W-9S.	B310	0.40	270.00
08/05/24	DDW	CONFERENCES REGARDING TIMING OF DISTRIBUTIONS AND CONDITIONS AND FINALIZE RELATED COVER LETTER.	B310	1.20	810.00
08/06/24	DDW	REVIEW AND RESPOND TO EMAILS AND CALLS REGARDING INVESTOR INQUIRIES REGARDING W-9S, DISTRIBUTIONS AND OTHER ISSUES.	B110	1.10	742.50
08/06/24	DDW	PREPARE FOR AND ATTEND CONFERENCE WITH AHUJA & CONSULTANTS REGARDING TAX AND OTHER ISSUES.	B240	1.40	945.00
08/06/24	DDW	REVIEW AND RESPOND TO ISSUES REGARDING TIMING OF DISTRIBUTION.	B310	0.80	540.00
08/07/24	DDW	MULTIPLE EMAILS AND CONFERENCES WITH INVESTORS AND INTERNALLY REGARDING W-9S, DISTRIBUTIONS, AND OTHER ISSUES.	B310	1.70	1,147.50
08/07/24	DDW	REVIEW OF REPORT REGARDING AUCTION PROCEEDS PAYMENTS AND COMMUNICATE WITH AHUJA & CONSULTANTS REGARDING SAME.	B110	0.40	270.00
08/08/24	DDW	MULTIPLE EMAILS AND CONFERENCES REGARDING AMOUNTS OF DISTRIBUTIONS, TIMING OF DISTRIBUTIONS, COMPLAINTS ABOUT DISTRIBUTIONS, W-9S AND OTHER ISSUES.	B310	2.60	1,755.00
08/08/24	DDW	REVIEW AND RESPOND TO SEC REGARDING INVESTOR INQUIRY.	B110	0.60	405.00
08/09/24	DDW	REVIEW AND RESPOND TO SOMPO REGARDING PRE-RECEIVERSHIP CLAIM.	B110	0.60	405.00
08/09/24	DDW	MULTIPLE COMMUNICATIONS REGARDING TIMING, AMOUNT AND QUESTIONS REGARDING DISTRIBUTIONS AND W-9S.	B310	2.60	1,755.00
08/12/24	DDW	REVIEW OF INFORMATION RELATED TO ALLEGED INVESTOR AND ATTEMPTED CONFERENCE REGARDING SAME.	B310	0.50	337.50
08/12/24	DDW	ANALYZE RECENTLY 5TH CIRCUIT DECISIONS ON REMEDIES RELATED TO CLAIMS RECOVERY OF ASSETS.	BT160	0.40	270.00
08/12/24	DDW	MULTIPLE COMMUNICATIONS REGARDING INVESTOR INQUIRIES REGARDING DISTRIBUTIONS, PAYMENTS AND	B310	1.90	1,282.50



DEBORAH D WILLIAMSON
DEBORAH WILLIAMSON

MATTER #: 122686.000001
INVOICE #: 3613586
PAGE 3

OCTOBER 31, 2024

DATE	ID	DESCRIPTION	TASK	HOURS	AMOUNT
		OTHER ISSUES.			
08/13/24	DDW	MULTIPLE CONFERENCES AND EMAILS REGARDING W-9S, ADDRESSES AND OTHER ISSUES.	B310	1.30	877.50
08/14/24	DDW	DRAFT LETTERS TO PROFESSIONALS REGARDING PAYMENTS.	B110	0.80	540.00
08/14/24	DDW	MULTIPLE COMMUNICATIONS REGARDING W-9S, INCLUDING CHANGES OF ADDRESSES, DEATH OF CLAIMANT AND OTHER ISSUES.	B310	1.40	945.00
08/15/24	DDW	REVIEW OF FIFTH CIRCUIT DECISION ADDRESSING "TRACING" IN FRAUDULENT CONVEYANCE CONTEXT, DRAFT AND RESPOND EMAILS REGARDING SAME.	BT160	1.00	675.00
08/15/24	DDW	PREPARE FOR AND ATTEND HEARING.	B110	0.90	607.50
08/15/24	DDW	RECEIVER CLAIMS; TELEPHONE CONFERENCE AND EMAILS REGARDING W9S INCLUDING COUNSEL FOR MR. ROGERS; REVIEW UPDATE REGARDING W-9 STATUS.	B110	0.70	472.50
08/16/24	DDW	CONFERENCE WITH COUNSEL FOR GATHERING SYSTEM REGARDING EFFECT OF ABANDONMENT IN SUTTON COUNTY.	B110	0.50	337.50
08/19/24	DDW	MULTIPLE COMMUNICATIONS REGARDING RECEIPT OF W-9S AND OTHER ISSUES RELATED TO DISTRIBUTIONS.	B310	1.20	810.00
08/19/24	DDW	REVIEW AND RESPOND TO UPDATES REGARDING INVESTIGATION BY STATE AGENCY AND POTENTIAL HEARING AND NEED FOR EVIDENCE.	B110	0.40	270.00
08/20/24	DDW	REVIEW PREPARE FOR AND ATTEND CONFERENCE WITH AHUJA & CONSULTANTS.	B110	0.70	472.50
08/20/24	DDW	REVIEW OF INFORMATION RELATED TO CLAIMS OF MR. ROGERS, W-9 AND INSTRUCTIONS FOR PAYMENT; REVIEW AND RESPOND TO OTHER INQUIRIES REGARDING PAYMENTS.	B310	1.30	877.50
08/20/24	DDW	REVIEW AND RESPOND TO INQUIRIES FROM INVESTORS.	B110	1.60	1,080.00
08/20/24	DDW	REVIEW LETTER TO CALIFORNIA FRANCHISE TAX BOARD.	B240	0.50	337.50
08/21/24	DDW	DRAFT AND RESPOND TO AHUJA & CONSULTANTS REGARDING NEW FIFTH CIRCUIT DECISION AND ANALYSIS ON POTENTIAL RECOVERY OF ASSETS.	B240	0.40	270.00
08/22/24	DDW	COMMUNICATE WITH INVESTOR.	B110	0.70	472.50
08/23/24	DDW	REVIEW AND RESPOND TO EMAILS WITH STRETTO REGARDING DISTRIBUTIONS SCHEDULE.	B310	0.30	202.50
08/26/24	DDW	PREPARE FOR AND ATTEND CONFERENCES REGARDING DISTRIBUTION TIMING AND OTHER ISSUES; DRAFT AND RESPOND TO EMAILS REGARDING SAME.	B310	0.90	607.50



DEBORAH D WILLIAMSON
DEBORAH WILLIAMSON

MATTER #: 122686.000001
INVOICE #: 3613586
PAGE 4

OCTOBER 31, 2024

DATE	ID	DESCRIPTION	TASK	HOURS	AMOUNT
08/26/24	DDW	MULTIPLE COMMUNICATIONS WITH INVESTORS REGARDING DISTRIBUTIONS.	B310	0.80	540.00
08/27/24	DDW	MULTIPLE COMMUNICATIONS WITH INVESTORS REGARDING DISTRIBUTIONS.	B310	1.30	877.50
08/27/24	DDW	CONFERENCE REGARDING DISTRIBUTIONS AND OTHER ISSUES.	B310	0.60	405.00
08/28/24	DDW	PREPARE FOR AND ATTEND CONFERENCE WITH SEC REGARDING VARIOUS ISSUES.	B110	0.80	540.00
08/28/24	DDW	ANALYSIS AND DRAFT DOCUMENTS RELATED TO PROPOSED PROCESS FOR TERMINATION OF ENTITIES.	B110	1.90	1,282.50
08/29/24	DDW	DRAFT AND RESPOND TO EMAILS REGARDING TERMINATION OF VARIOUS DEFENDANTS AND/OR RELIEF DEFENDANTS.	B110	0.60	405.00
08/29/24	DDW	MULTIPLE CONFERENCES AND EMAILS REGARDING TIMING OF DISTRIBUTIONS AND RECEIPT OF W-9S.	B310	1.10	742.50
08/29/24	DDW	CORRESPONDENCE WITH INVESTORS REGARDING CLAIMS.	B310	0.70	472.50
08/30/24	DDW	MULTIPLE CONFERENCES AND EMAILS REGARDING DISTRIBUTIONS, BENEFICIARIES AND TIMING OF DISTRIBUTION OF CHECKS.	B310	1.40	945.00
08/30/24	DDW	PREPARE FOR AND ATTEND CONFERENCE WITH SEC.	B110	0.50	337.50
TOTAL				41.00	\$27,675.00



DEBORAH D WILLIAMSON
DEBORAH WILLIAMSON

MATTER #: 122686.000001
INVOICE #: 3613586
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OCTOBER 31, 2024

BILLING SUMMARY					
ID	TIMEKEEPER	TITLE	HOURS	RATE	AMOUNT
DDW	DEBORAH WILLIAMSON	MEMBER	41.00	675.00	27,675.00
TOTAL			41.00		\$27,675.00



DEBORAH D WILLIAMSON
DEBORAH WILLIAMSON

MATTER #: 122686.000001
INVOICE #: 3613586
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OCTOBER 31, 2024

TASK SUMMARY

TASK	TASK DESCRIPTION	HOURS	AMOUNT
B110	CASE ADMINISTRATION	12.80	8,640.00
B240	TAX ISSUES	2.80	1,890.00
B310	CLAIMS ADMINISTRATION & OBJECT	24.00	16,200.00
BT160	LITIGATION CONSULTING	1.40	945.00
TOTAL		41.00	27,675.00



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

OCTOBER 31, 2024
MATTER #: 122686.000001
INVOICE #: 3619872

FOR PROFESSIONAL SERVICES RENDERED

RE: RECEIVER'S TIME

FEES	\$	29,970.00
INVOICE TOTAL	\$	29,970.00



DEBORAH D WILLIAMSON
DEBORAH WILLIAMSON

MATTER #: 122686.000001
INVOICE #: 3619872
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OCTOBER 31, 2024

RE: RECEIVER'S TIME

DATE	ID	DESCRIPTION	TASK	HOURS	AMOUNT
09/03/24	DDW	EMAILS AND PHONE CALLS REGARDING DISTRIBUTIONS.	B310	1.70	1,147.50
09/03/24	DDW	REVIEW OF PLEADINGS FILED BY SEC.	B110	0.80	540.00
09/04/24	DDW	PREPARE FOR AND ATTEND CONFERENCE WITH AHUJA & CONSULTANTS REGARDING TAX AND OTHER ISSUES; DRAFT AND RESPOND TO COMMUNICATIONS REGARDING 941 TAX RETURNS AND POTENTIAL TAX CLAIMS.	B240	0.80	540.00
09/04/24	DDW	CONFERENCE WITH SEC REGARDING DISTRIBUTIONS; DRAFT AND RESPOND TO EMAILS WITH STRETTO REGARDING SAME.	B310	0.50	337.50
09/04/24	DDW	MULTIPLE COMMUNICATIONS REGARDING W-9 AND RELATED ISSUES.	B310	1.30	877.50
09/05/24	DDW	DRAFT, REVIEW AND REVISE NOTICE OF PROPOSED DISTRIBUTIONS; MULTIPLE COMMUNICATIONS WITH INVESTORS REGARDING TIMING OF DISTRIBUTIONS.	B110	2.10	1,417.50
09/05/24	DDW	TELEPHONE CONFERENCES (2) WITH IRS; DRAFT AND RESPOND TO EMAILS REGARDING SAME.	B240	0.90	607.50
09/05/24	DDW	TELEPHONE CALL WITH IBC REGARDING POTENTIAL FRAUDULENT ACTIVITY.	B110	0.40	270.00
09/06/24	DDW	REVIEW AND RESPOND TO MISCELLANEOUS CORRESPONDENCE.	B110	0.50	337.50
09/06/24	DDW	MULTIPLE COMMUNICATIONS REGARDING W-9S, ESTATES AND OTHER ISSUES.	B310	0.90	607.50
09/09/24	DDW	CONTINUE DRAFTING PLEADINGS REGARDING POTENTIAL CLOSING OF CASES.	B110	1.20	810.00
09/09/24	DDW	MULTIPLE COMMUNICATIONS REGARDING DISTRIBUTIONS.	B310	0.90	607.50
09/09/24	DDW	COMMUNICATIONS REGARDING TAX ISSUES.	B240	0.40	270.00
09/10/24	DDW	REVIEW, APPROVE AND EXECUTE APPROVALS OF DISTRIBUTIONS; MULTIPLE COMMUNICATIONS REGARDING W-9S, TIMING OF DISTRIBUTIONS AND OTHER DISTRIBUTION RELATED ISSUES.	B310	1.80	1,215.00
09/11/24	DDW	MULTIPLE COMMUNICATIONS REGARDING W-9S, DISTRIBUTIONS AND RELATED ISSUES.	B310	1.40	945.00
09/12/24	DDW	PREPARE FOR AND ATTEND CONFERENCE WITH MR. CUMMING AND AHUJA AND CONSULTANTS REGARDING 941	B240	1.90	1,282.50



DEBORAH D WILLIAMSON
DEBORAH WILLIAMSON

MATTER #: 122686.000001
INVOICE #: 3619872
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OCTOBER 31, 2024

DATE	ID	DESCRIPTION	TASK	HOURS	AMOUNT
		TAXES AND TAX RETURNS.			
09/12/24	DDW	REVIEW AND RESPOND TO NUMEROUS EMAILS REGARDING DISTRIBUTIONS, EFFECT OF DEATH OF INVESTORS (MULTIPLE), COUNSEL FOR INVESTMENT ADVISORS AND OTHER RELATED TO W-9S AND OTHER ISSUES.	B310	1.20	810.00
09/12/24	DDW	REVIEW OF REQUEST FROM IOWA DEPARTMENT OF INSURANCE; DRAFT AND RESPOND TO EMAILS REGARDING SAME.	BT160	0.50	337.50
09/13/24	DDW	MULTIPLE COMMUNICATIONS REGARDING PAPERWORK, CHANGES IN PAYMENTS DUE TO DEATHS AND OTHER ISSUES; AND TIMING OF NEXT DISTRIBUTION TO THOSE WHO DID NOT TIMELY SUBMIT PAPERWORK.	B310	0.90	607.50
09/16/24	DDW	ADDRESS MULTIPLE ISSUES INCLUDING PAYMENTS, RECEIPT OF CHECKS, AND LACK OF CHECKS, FUTURE RECOVERIES.	B110	1.80	1,215.00
09/16/24	DDW	REVIEW OF BAHAMAS ANALYSIS; DRAFT AND RESPOND TO EMAILS REGARDING SAME.	BT160	2.20	1,485.00
09/17/24	DDW	PREPARE FOR AND ATTEND CONFERENCE WITH AHUJA & CONSULTANTS REGARDING BAHAMAS ANALYSIS AND TAX ISSUES.	B240	1.10	742.50
09/17/24	DDW	MULTIPLE CONFERENCES AND EMAILS REGARDING PAYMENTS, LACK OF PAYMENTS, W9S, DELIVERY OF PAYMENTS AND OTHER ISSUES.	B310	1.30	877.50
09/18/24	DDW	MULTIPLE EMAILS AND CONFERENCE CALLS REGARDING QUESTIONS RELATED TO DISTRIBUTIONS.	B310	2.20	1,485.00
09/18/24	DDW	REVISE MOTION TO APPROVE PROCEDURES FOR TERMINATING RECEIVERSHIP ENTITIES.	B110	0.90	607.50
09/19/24	DDW	MULTIPLE EMAILS, CONFERENCES AND CONFERENCE CALLS REGARDING DISTRIBUTIONS, FORMS OF CHECKS, COMMUNICATIONS WITH CREDITORS/INVESTORS, RE-ISSUANCE OF PAYMENTS, NEXT DISTRIBUTIONS AND OTHER ISSUES.	B310	2.20	1,485.00
09/19/24	DDW	REVISE PLEADINGS REGARDING TERMINATION OF ENTITIES.	B110	1.70	1,147.50
09/23/24	DDW	REVIEW OF THE IRS NOTICES REGARDING BARRON PETROLEUM EMPLOYMENT TAX RETURNS; DRAFT AND RESPOND TO EMAILS REGARDING SAME.	B240	0.70	472.50
09/23/24	DDW	REVIEW OF AGREED JUDGMENTS INCLUDING PAYMENT TERMS; DRAFT AND RESPOND TO EMAILS REGARDING SAME.	B110	0.90	607.50
09/24/24	DDW	REVISE MOTION REGARDING PROCESS FOR TERMINATION OF	B110	1.40	945.00



DEBORAH D WILLIAMSON
DEBORAH WILLIAMSON

MATTER #: 122686.000001
INVOICE #: 3619872
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OCTOBER 31, 2024

DATE	ID	DESCRIPTION	TASK	HOURS	AMOUNT
		CERTAIN ENTITIES.			
09/24/24	DDW	CONFERENCES REGARDING W-9S AND RELATED ISSUES.	B310	0.60	405.00
09/25/24	DDW	MULTIPLE COMMUNICATIONS REGARDING W-9S, DEATH OF INVESTORS AND OTHER ISSUES.	B310	1.00	675.00
09/26/24	DDW	MULTIPLE COMMUNICATIONS (EMAILS AND CONFERENCE CALLS) REGARDING CURRENT AND FUTURE DISTRIBUTIONS.	B310	0.90	607.50
09/27/24	DDW	MULTIPLE CONFERENCES REGARDING IRS, BARRON AND NOTICES.	B240	0.90	607.50
09/27/24	DDW	MULTIPLE EMAILS AND COMMUNICATIONS REGARDING W-9S AND OTHER ISSUES.	B310	1.00	675.00
09/30/24	DDW	CONTINUE REVISING PLEADINGS REGARDING PROCESS FOR TERMINATION OF BUSINESS, INCLUDING REVIEW OF RELEVANT AUTHORITIES.	B110	2.40	1,620.00
09/30/24	DDW	MULTIPLE CONFERENCES AND EMAILS REGARDING W-9S AND OTHER DISTRIBUTION ISSUES.	B310	1.10	742.50
		TOTAL		44.40	\$29,970.00



DEBORAH D WILLIAMSON
DEBORAH WILLIAMSON

MATTER #: 122686.000001
INVOICE #: 3619872
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OCTOBER 31, 2024

BILLING SUMMARY					
ID	TIMEKEEPER	TITLE	HOURS	RATE	AMOUNT
DDW	DEBORAH WILLIAMSON	MEMBER	44.40	675.00	29,970.00
TOTAL			44.40		\$29,970.00



DEBORAH D WILLIAMSON
DEBORAH WILLIAMSON

MATTER #: 122686.000001
INVOICE #: 3619872
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OCTOBER 31, 2024

TASK SUMMARY

TASK	TASK DESCRIPTION	HOURS	AMOUNT
B110	CASE ADMINISTRATION	14.10	9,517.50
B240	TAX ISSUES	6.70	4,522.50
B310	CLAIMS ADMINISTRATION & OBJECT	20.90	14,107.50
BT160	LITIGATION CONSULTING	2.70	1,822.50
TOTAL		44.40	29,970.00



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

DUE UPON RECEIPT

AUGUST 27, 2024
MATTER #: 122686.000002
INVOICE #: 3606553

FOR PROFESSIONAL SERVICES RENDERED

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

FEES	\$	49,785.30
DISBURSEMENTS		3,462.65
INVOICE TOTAL	\$	53,247.95



DEBORAH D WILLIAMSON
DEBORAH WILLIAMSON

MATTER #: 122686.000002
INVOICE #: 3606553
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AUGUST 27, 2024

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

DATE	ID	DESCRIPTION	TASK	HOURS	AMOUNT
07/01/24	MGC	REVIEW COURT ORDER DATED JULY 1, 2024 APPROVING DISTRIBUTION MOTION.	B130	0.10	64.80
07/01/24	DNR	REVIEW AND RESPOND TO INVESTOR INQUIRIES.	B110	1.20	420.00
07/01/24	DNR	CORRESPONDENCE TO STRETTO REGARDING INVESTOR MAILING ADDRESS UPDATE.	B110	0.10	35.00
07/01/24	DNR	RECEIVE AND REVIEW IBC ACCOUNT STATEMENTS FOR JUNE 2024; SEND TO AHUJA & CONSULTANTS.	B210	0.50	175.00
07/01/24	DNR	CORRESPONDENCE WITH YAIR BARAHONA REGARDING DATA HOSTING PAYMENT.	B210	0.20	70.00
07/01/24	DNR	REVIEW ORDERS GRANTING DISTRIBUTION MOTION AND ACCEPTING REPORT AND RECOMMENDATION OF JUDGE RAY ON SAME.	B130	0.20	70.00
07/01/24	DNR	REVIEW ORDERS REGARDING OMNIBUS CLAIMS OBJECTION.	B310	0.20	70.00
07/01/24	DNR	CORRESPONDENCE TO STRETTO REGARDING DISTRIBUTION AND CLAIMS OBJECTION ORDERS AND NEXT STEPS FOR TIMING AND DISTRIBUTION PROCESS.	B130	0.10	35.00
07/01/24	DNR	CORRESPONDENCE TO AHUJA & CONSULTANTS REGARDING ORDERS ON DISTRIBUTION MOTION AND CLAIMS OBJECTION.	B130	0.10	35.00
07/01/24	DNR	RECEIVE AND REVIEW RECEIVER'S MAIL.	B210	0.50	175.00
07/01/24	DNR	CORRESPONDENCE TO OIL AND GAS COUNSEL REGARDING LETTER REGARDING INJECTION PERMIT FOR ABANDONED WELL.	B210	0.10	35.00
07/01/24	DNR	RECEIVE AND PROCESS W-95; SEND TO STRETTO.	B110	1.20	420.00
07/01/24	DNR	UPDATE WEBSITE CONTENT.	B110	0.10	35.00
07/01/24	DNR	CORRESPONDENCE WITH AUCTIONEER REGARDING DELIVERY OF ITEMS FOR JULY 2024 AUCTION.	B130	0.20	70.00
07/01/24	DNR	REVISE FAQs.	B110	1.30	455.00
07/01/24	DNR	CORRESPONDENCE TO DEBORAH WILLIAMSON REGARDING REVISED DRAFT FAQs.	B110	0.10	35.00
07/01/24	DNR	CORRESPONDENCE TO TAX COUNSEL REGARDING ORDER GRANTING DISTRIBUTION MOTION REGARDING PUSH-OUT ELECTION.	B240	0.10	35.00



DEBORAH D WILLIAMSON
DEBORAH WILLIAMSON

MATTER #: 122686.000002
INVOICE #: 3606553
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AUGUST 27, 2024

DATE	ID	DESCRIPTION	TASK	HOURS	AMOUNT
07/01/24	DNR	CORRESPONDENCE WITH WAB REGARDING ACCOUNT TRANSFER ITEMS.	B210	0.10	35.00
07/01/24	DNR	CORRESPONDENCE WITH WOLFEPAK REGARDING ACCOUNT TERMINATION AND REFUND.	B210	0.20	70.00
07/01/24	DNR	RECEIVE AND REVIEW WAB ACCOUNT STATEMENTS FOR JUNE 2024; SEND TO AHUJA & CONSULTANTS.	B210	0.30	105.00
07/01/24	DNR	PROCESS ACCOUNT TRANSFERS.	B210	0.30	105.00
07/01/24	DNR	CORRESPONDENCE WITH STRETTO REGARDING INVESTOR W-9 ITEMS AND NEXT STEPS TO PROCESS SAME.	B110	0.20	70.00
07/01/24	DNR	CORRESPONDENCE WITH DEBORAH D. WILLIAMSON REGARDING ACCOUNT TRANSFER ITEMS.	B210	0.20	70.00
07/01/24	DNR	CORRESPONDENCE TO OIL AND GAS COUNSEL REGARDING RAILROAD COMMISSION OF TEXAS ENFORCEMENT ACTIONS.	B210	0.10	35.00
07/01/24	DNR	RECEIVE AND REVIEW IRS SUBMISSIONS FROM AHUJA & CONSULTANTS.	B240	0.30	105.00
07/01/24	DNR	CORRESPONDENCE WITH AHUJA & CONSULTANTS REGARDING PAYROLL TAX DOCUMENTS.	B240	0.20	70.00
07/01/24	DNR	ANALYZE TAX-RELATED MATERIALS AND COMPILE FOURTH BATCH FOR PRODUCTION.	B240	3.50	1,225.00
07/02/24	DNR	REVIEW AND RESPOND TO INVESTOR INQUIRIES.	B110	0.90	315.00
07/02/24	DNR	CORRESPONDENCE WITH AUCTIONEER REGARDING DELIVERY OF ITEMS FOR JULY 2024 AUCTION.	B130	0.30	105.00
07/02/24	DNR	CALL WITH DEBORAH D. WILLIAMSON REGARDING TAX-RELATED DOCUMENT PRODUCTION ITEMS.	B240	0.40	140.00
07/02/24	DNR	CORRESPONDENCE WITH IOWA ENFORCEMENT COUNSEL REGARDING REQUEST FOR INFORMATION FROM RECEIVER.	B110	0.10	35.00
07/02/24	DNR	CORRESPONDENCE WITH TX OFFICE OF THE ATTORNEY GENERAL REGARDING ENFORCEMENT LETTERS REGARDING ADMINISTRATIVE PENALTY COLLECTION.	B210	0.20	70.00
07/02/24	DNR	CORRESPONDENCE TO AUCTIONEER AND COUNSEL REGARDING CERTIFICATE OF NO OBJECTION TO JULY 2024 AUCTION NOTICE.	B130	0.10	35.00
07/02/24	DNR	CORRESPONDENCE WITH AHUJA & CONSULTANTS REGARDING INVESTOR K-1 INQUIRY.	B240	0.20	70.00
07/02/24	DNR	CALL WITH DEBORAH D. WILLIAMSON AND TAX COUNSEL REGARDING IRS TRANSCRIPTS AND FORM ITEMS.	B240	0.50	175.00



DEBORAH D WILLIAMSON
DEBORAH WILLIAMSON

MATTER #: 122686.000002
INVOICE #: 3606553
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AUGUST 27, 2024

DATE	ID	DESCRIPTION	TASK	HOURS	AMOUNT
07/02/24	DNR	RECEIVE AND PROCESS W-9S; SEND TO STRETTO.	B110	1.20	420.00
07/02/24	DNR	CORRESPONDENCE WITH SEC COUNSEL REGARDING ADVISOR ISSUES.	B110	0.40	140.00
07/02/24	DNR	MULTIPLE TELEPHONE CONFERENCES WITH SEC COUNSEL REGARDING ADVISOR ISSUES.	B110	0.80	280.00
07/02/24	DNR	CORRESPONDENCE WITH AHUJA & CONSULTANTS REGARDING ADVISOR ANALYSIS.	B120	0.40	140.00
07/02/24	DNR	CORRESPONDENCE WITH AHUJA & CONSULTANTS REGARDING IRS PAYROLL SUBMISSIONS.	B240	0.20	70.00
07/02/24	DNR	ANALYZE TAX-RELATED MATERIALS AND FINALIZE DOCUMENT PRODUCTION.	B240	3.00	1,050.00
07/02/24	DNR	CORRESPONDENCE WITH CONTRACT PUMPER REGARDING STATUS OF WELL LOGS AND FILES IN ELECTRA STORAGE UNIT.	B210	0.30	105.00
07/02/24	DNR	REVISE, FINALIZE, AND FILE CERTIFICATE OF NO OBJECTION TO JULY 2024 AUCTION.	B130	0.30	105.00
07/02/24	DNR	RECEIVE AND PROCESS RECEIVER'S MAIL.	B210	0.50	175.00
07/02/24	DNR	FURTHER REVISE FAQS.	B110	0.60	210.00
07/02/24	DNR	UPDATE WEBSITE CONTENT.	B110	0.50	175.00
07/02/24	DNR	DRAFT CORRESPONDENCE TO DEPARTMENT OF JUSTICE COUNSEL REGARDING TAX DOCUMENTS AND IRS ISSUES.	B240	0.20	70.00
07/02/24	MGC	REVIEW OF SPREADSHEET FROM AHUJA & CONSULTANTS (0.2); CONFERENCE WITH MS. WILLIAMSON, MS. BEHREND'S REGARDING TAX DUE DILIGENCE MATTERS (0.5).	B240	0.70	453.60
07/03/24	TED	ADDRESS INVESTOR INQUIRIES.	B110	0.10	25.65
07/03/24	DNR	PRODUCE IRS-RELATED DOCUMENTS TO DOJ TAX COUNSEL.	B240	0.20	70.00
07/03/24	DNR	TELEPHONE CONFERENCE WITH INVESTOR REGARDING QUESTIONS ON DISTRIBUTION ORDER.	B110	0.10	35.00
07/03/24	DNR	CORRESPONDENCE WITH CONTRACT PUMPER REGARDING WELL FILES IN ALEDO AND NEXT STEPS.	B210	0.40	140.00
07/03/24	DNR	CORRESPONDENCE TO OFFICE OF THE ATTORNEY GENERAL REGARDING ABANDONED WELL FILES FOR TURNOVER TO RAILROAD COMMISSION OF TEXAS.	B210	0.10	35.00
07/03/24	DNR	CORRESPONDENCE FROM AHUJA & CONSULTANTS REGARDING QUARTERLY REPORT FOR 2Q2024.	BT155	0.10	35.00
07/03/24	DNR	CORRESPONDENCE WITH AUCTIONEER REGARDING SIGNATURE ON TITLES AND ISSUES ON SAME FOR JULY 2024	B130	0.40	140.00



DEBORAH D WILLIAMSON
DEBORAH WILLIAMSON

MATTER #: 122686.000002
INVOICE #: 3606553
PAGE 5

AUGUST 27, 2024

DATE	ID	DESCRIPTION	TASK	HOURS	AMOUNT
		AUCTION.			
07/03/24	DNR	REVIEW AND RESPOND TO INVESTOR AND CREDITOR INQUIRIES.	B110	1.40	490.00
07/03/24	DNR	REVIEW AND PROCESS W-9S; SEND TO STRETTO.	B110	1.00	350.00
07/03/24	DNR	CORRESPONDENCE TO DOJ TAX COUNSEL REGARDING DOCUMENT PRODUCTION.	B240	0.10	35.00
07/03/24	DNR	PROCESS POWERS OF ATTORNEY FOR IRS; SEND TO AHUJA & CONSULTANTS.	B240	0.20	70.00
07/03/24	DNR	CORRESPONDENCE TO SEC COUNSEL REGARDING ADVISOR ISSUES.	B110	0.10	35.00
07/03/24	DNR	PREPARE AND SEND PACKAGE TO AUCTIONEER WITH TITLES AND KEY.	B130	0.40	140.00
07/03/24	DNR	TELEPHONE CONFERENCE WITH TRUSTEE REGARDING W-9 SUBMISSION AND DOCUMENTATION SUPPORTING TRUST.	B110	0.10	35.00
07/03/24	DNR	TELEPHONE CONFERENCE WITH INVESTOR REGARDING CLAIM CALCULATION AND DISTRIBUTION QUESTIONS.	B110	0.10	35.00
07/03/24	DNR	CORRESPONDENCE FROM CONTRACT OPERATOR REGARDING QUARTERLY REPORT FOR 2Q2024.	BT155	0.10	35.00
07/03/24	DNR	CORRESPONDENCE WITH CONTRACT OPERATOR REGARDING WELL FILES LIST FOR ALEDO.	B210	0.10	35.00
07/03/24	DNR	TELEPHONE CONFERENCE WITH INVESTOR REGARDING QUESTIONS ON DISTRIBUTION CHECKS AND SETTLEMENT MOTION.	B110	0.10	35.00
07/03/24	DNR	TELEPHONE CONFERENCE WITH INVESTOR REGARDING DISTRIBUTION CHECKS AND QUESTIONS ON CHARACTERIZATION OF FUNDS.	B110	0.10	35.00
07/03/24	DNR	TELEPHONE CONFERENCE WITH INVESTOR REGARDING QUESTIONS ON REQUIREMENT OF W-9.	B110	0.10	35.00
07/03/24	DNR	TELEPHONE CONFERENCE WITH AUCTIONEER REGARDING TITLES.	B130	0.10	35.00
07/03/24	DNR	CORRESPONDENCE WITH STRETTO REGARDING SERVICE OF ORDERS ON OMNIBUS CLAIMS OBJECTION.	B310	0.30	105.00
07/05/24	DNR	CORRESPONDENCE WITH VICKI PALMOUR CONSULTING REGARDING WOLFEPAK ACCESS ISSUES AND SUBSCRIPTION STATUS.	B210	0.20	70.00
07/05/24	DNR	CORRESPONDENCE WITH STRETTO REGARDING SERVICE OF ORDER SUSTAINING OMNIBUS CLAIMS OBJECTION ON	B310	0.30	105.00



DEBORAH D WILLIAMSON
DEBORAH WILLIAMSON

MATTER #: 122686.000002
INVOICE #: 3606553
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AUGUST 27, 2024

DATE	ID	DESCRIPTION	TASK	HOURS	AMOUNT
		DISPUTED CLAIMANTS.			
07/08/24	DNR	REVIEW AND PROCESS W-9S; SEND TO STRETTO.	B110	1.30	455.00
07/08/24	DNR	REVIEW AND RESPOND TO INVESTOR INQUIRIES.	B110	2.20	770.00
07/08/24	DNR	CALL WITH DEBORAH D. WILLIAMSON AND SEC COUNSEL REGARDING DISTRIBUTION TIMING AND PROTOCOL.	B110	0.50	175.00
07/08/24	DNR	CORRESPONDENCE WITH CONTRACT PUMPER REGARDING ELECTRA STORAGE UNIT.	B210	0.20	70.00
07/08/24	DNR	CORRESPONDENCE WITH AUCTIONEER REGARDING TITLES TO PROPERTY.	B130	0.30	105.00
07/08/24	DNR	CALL WITH CONTRACT PUMPER REGARDING ELECTRA STORAGE UNIT AND WELL FILES ITEMS.	B210	0.20	70.00
07/08/24	DNR	REVIEW AND PROCESS RECEIVER'S MAIL.	B210	0.40	140.00
07/08/24	DNR	CORRESPONDENCE WITH OFFICE OF ATTORNEY GENERAL REGARDING RAILROAD COMMISSION LETTER TO LEADING EDGE.	B210	0.30	105.00
07/08/24	DNR	TELEPHONE CONFERENCE WITH DEBORAH D. WILLIAMSON REGARDING UPCOMING DEADLINES AND OUTSTANDING ADMINISTRATIVE ITEMS.	B110	0.30	105.00
07/08/24	DNR	CORRESPONDENCE TO STRETTO REGARDING CLAIMS STATISTICS.	B310	0.10	35.00
07/08/24	DNR	COMPILE AND SEND PACKAGE TO AUCTIONEER FOR JULY 2024 AUCTION.	B130	0.30	105.00
07/08/24	DNR	CORRESPONDENCE WITH OFFICE OF THE ATTORNEY GENERAL REGARDING WELL FILES FOR TURNOVER TO RAILROAD COMMISSION OF TEXAS.	B210	0.20	70.00
07/08/24	DNR	CORRESPONDENCE WITH DEBORAH D. WILLIAMSON AND OIL AND GAS COUNSEL REGARDING INSURANCE.	B210	0.30	105.00
07/08/24	DNR	CORRESPONDENCE TO SEC COUNSEL REGARDING BANK RECORDS.	B110	0.10	35.00
07/08/24	DNR	CORRESPONDENCE WITH AHUJA & CONSULTANTS REGARDING QUARTERLY REPORT EXHIBIT.	BT155	0.20	70.00
07/08/24	DNR	CONTINUE DRAFTING QUARTERLY REPORT FOR 2Q2024.	BT155	2.00	700.00
07/09/24	DNR	CORRESPONDENCE WITH AHUJA & CONSULTANTS REGARDING UPDATED CLAIM AMOUNT FOR INVESTOR PER COURT ORDER.	B310	0.30	105.00
07/09/24	DNR	CORRESPONDENCE WITH AHUJA & CONSULTANTS REGARDING DISTRIBUTION REPORT AND UPDATES FOR SAME; REVIEW	B130	0.50	175.00



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DATE	ID	DESCRIPTION	TASK	HOURS	AMOUNT
		REVISED OF SAME.			
07/09/24	DNR	CORRESPONDENCE WITH OFFICE OF ATTORNEY GENERAL REGARDING TURNOVER OF ABANDONED WELL FILES TO RAILROAD COMMISSION.	B210	0.40	140.00
07/09/24	DNR	CORRESPONDENCE WITH AHUJA & CONSULTANTS REGARDING DEPOSIT AND WIRE INFORMATION.	B210	0.20	70.00
07/09/24	DNR	CORRESPONDENCE WITH SEC COUNSEL REGARDING BANK RECORDS.	B110	0.20	70.00
07/09/24	DNR	CORRESPONDENCE WITH STRETTO REGARDING REQUESTED ALLOWED CLAIM AMOUNT AND AMOUNT ORDERED BY COURT.	B310	0.20	70.00
07/09/24	DNR	CORRESPONDENCE WITH STRETTO REGARDING CLAIMS STATISTICS AND DISBURSEMENT ITEMS.	B310	0.20	70.00
07/09/24	DNR	CORRESPONDENCE WITH AHUJA & CONSULTANTS REGARDING TAX CALL.	B240	0.20	70.00
07/09/24	DNR	REVIEW AND PROCESS W-9S; SEND TO STRETTO.	B110	1.20	420.00
07/09/24	DNR	REVIEW AND RESPOND TO INVESTOR INQUIRIES.	B110	0.80	280.00
07/09/24	DNR	CORRESPONDENCE WITH CONTRACT PUMPER REGARDING ABANDONED WELLS IN WICHITA COUNTY.	B130	0.20	70.00
07/09/24	DNR	CORRESPONDENCE WITH STRETTO REGARDING SERVICE OF ORDER SUSTAINING CLAIMS OBJECTION.	B310	0.20	70.00
07/09/24	DNR	REVIEW AND FILE CERTIFICATE OF SERVICE REGARDING ORDER SUSTAINING OMNIBUS CLAIMS OBJECTION.	B310	0.20	70.00
07/09/24	DNR	UPDATE WEBSITE CONTENT.	B110	0.20	70.00
07/09/24	DNR	CORRESPONDENCE WITH AHUJA & CONSULTANTS REGARDING IRS TRANSCRIPTS.	B240	0.20	70.00
07/09/24	DNR	CORRESPONDENCE TO SEC COUNSEL REGARDING ADVISOR ISSUES.	B110	0.10	35.00
07/09/24	DNR	RECEIVE AND REVIEW EXECUTED IRS POWERS OF ATTORNEY FROM AHUJA & CONSULTANTS.	B240	0.20	70.00
07/09/24	DNR	CORRESPONDENCE TO DEPARTMENT OF JUSTICE TAX COUNSEL REGARDING ADDITIONAL EXECUTED POWER OF ATTORNEY DOCUMENTATION.	B240	0.10	35.00
07/09/24	DNR	CORRESPONDENCE TO CONTRACT PUMPER REGARDING SHIPPING OF ABANDONED WELL FILES.	B130	0.10	35.00
07/10/24	TED	ADDRESS INVESTOR INQUIRIES	B110	0.20	51.30



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07/11/24	DNR	REVIEW AND RESPOND TO INVESTOR INQUIRIES.	B110	1.40	490.00
07/11/24	DNR	REVIEW AND PROCESS W-9S; SEND TO STRETTO.	B110	1.00	350.00
07/11/24	DNR	REVIEW AND PROCESS RECEIVER'S MAIL.	B210	0.40	140.00
07/11/24	DNR	CORRESPONDENCE WITH AHUJA & CONSULTANTS REGARDING QUARTERLY REPORT EXHIBIT.	BT155	0.50	175.00
07/11/24	DNR	REVIEW DRAFT EXHIBIT TO QUARTERLY REPORT AND PROVIDE COMMENTS ON SAME TO AHUJA & CONSULTANTS.	BT155	0.30	105.00
07/11/24	DNR	CORRESPONDENCE WITH DEBORAH D. WILLIAMSON AND OIL AND GAS COUNSEL REGARDING INSURANCE.	B210	0.30	105.00
07/11/24	DNR	CORRESPONDENCE TO CONTRACT OPERATOR REGARDING INSURANCE RENEWAL AND ITEMS ON SAME.	B210	0.10	35.00
07/11/24	DNR	CORRESPONDENCE WITH AHUJA & CONSULTANTS REGARDING WOLFEPAK REPORTS FOR BARRON PETROLEUM AND ARCOOIL.	B210	0.20	70.00
07/11/24	DNR	REVIEW REVISED QUARTERLY REPORT EXHIBIT.	BT155	0.10	35.00
07/11/24	DNR	CORRESPONDENCE WITH DEBORAH D. WILLIAMSON REGARDING QUARTERLY REPORT EXHIBIT.	BT155	0.30	105.00
07/11/24	DNR	CORRESPONDENCE FROM AHUJA & CONSULTANTS REGARDING REVISED BAHAMAS TRACING.	B120	0.10	35.00
07/11/24	DNR	RECEIVE ALL YEARS' REPORTING FROM WOLFEPAK FROM VICKI PALMOUR CONSULTING FOR BARRON PETROLEUM AND ARCOOIL.	B210	0.50	175.00
07/11/24	DNR	CORRESPONDENCE WITH CONTRACT OPERATOR REGARDING WELL FILES AND VENDOR CORRESPONDENCE.	B210	0.20	70.00
07/11/24	DNR	CORRESPONDENCE WITH STRETTO REGARDING REVISED CLAIMS REPORT ITEMS.	B310	0.20	70.00
07/11/24	DNR	TAX CALL WITH DEBORAH D. WILLIAMSON AND AHUJA & CONSULTANTS.	B240	0.40	140.00
07/11/24	DNR	REVIEW FINAL CLAIMS REPORT.	B310	0.30	105.00
07/11/24	DNR	CORRESPONDENCE TO AHUJA & CONSULTANTS REGARDING FINAL CLAIMS REPORT.	B310	0.10	35.00
07/11/24	DNR	REVISE QUARTERLY REPORT EXHIBIT.	BT155	0.20	70.00
07/11/24	DNR	CORRESPONDENCE TO FARMEE AND COUNSEL REGARDING PAYMENT STATUS OF AMOUNTS OUTSTANDING TO GULF COAST.	B210	0.10	35.00
07/11/24	DNR	CORRESPONDENCE TO DEBORAH D. WILLIAMSON REGARDING DRAFT QUARTERLY REPORT.	BT155	0.10	35.00



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07/11/24	DNR	CONTINUE DRAFTING 2Q2024 QUARTERLY REPORT.	BT155	1.50	525.00
07/11/24	DNR	CALL WITH CONTRACT PUMPER REGARDING ABANDONED WELL FILES AND SHIPPING TO RAILROAD COMMISSION OF TEXAS ISSUES.	B210	0.20	70.00
07/12/24	TED	ADDRESS INVESTOR INQUIRIES.	B110	0.10	25.65
07/12/24	DNR	REVIEW AND RESPOND TO INVESTOR INQUIRIES.	B110	0.60	210.00
07/12/24	DNR	CORRESPONDENCE WITH DARRELL R. JONES REGARDING QUARTERLY REPORT CONTENT FOR 2Q2024.	BT155	0.30	105.00
07/12/24	DNR	CORRESPONDENCE WITH STRETTO REGARDING CLAIMS REPORT REVISIONS.	B310	0.40	140.00
07/12/24	DNR	CORRESPONDENCE TO AHUJA & CONSULTANTS REGARDING REVISED CLAIMS REPORT.	B310	0.10	35.00
07/12/24	DNR	REVIEW REVISED CLAIMS REPORT AND ELECTION FORMS FOR CERTAIN INVESTOR SUPPORTING SAME.	B310	0.30	105.00
07/12/24	DNR	REVIEW AND PROCESS RECEIVER'S MAIL.	B210	0.30	105.00
07/12/24	DNR	CORRESPONDENCE TO DEBORAH D. WILLIAMSON AND OIL AND GAS COUNSEL REGARDING RAILROAD COMMISSION OF TEXAS COMPLAINT RECEIVED.	B210	0.10	35.00
07/12/24	DNR	REVIEW AND PROCESS W-9S; SEND TO STRETTO.	B110	0.60	210.00
07/15/24	DNR	REVIEW AND RESPOND TO INVESTOR INQUIRIES.	B110	2.00	700.00
07/15/24	DNR	REVIEW AND PROCESS W-9S AND SUPPORTING DOCUMENTATION; SEND TO STRETTO.	B110	1.30	455.00
07/15/24	DNR	REVIEW AND PROCESS RECEIVER'S MAIL.	B210	0.50	175.00
07/15/24	DNR	CORRESPONDENCE WITH COMPLIANCE TEAM REGARDING RAILROAD COMMISSION OF TEXAS MAIL RECEIVED.	B210	0.20	70.00
07/15/24	DNR	CORRESPONDENCE WITH OIL AND GAS COUNSEL REGARDING ESCHEAT PROCESS.	B210	0.20	70.00
07/15/24	DNR	CORRESPONDENCE TO DEPARTMENT OF JUSTICE TAX COUNSEL REGARDING IRS REFERRAL STATUS.	B240	0.10	35.00
07/15/24	DNR	CALL WITH CONTRACT PUMPER REGARDING WELL FILES FROM ALEDO TO RAILROAD COMMISSION LOGISTICS.	B210	0.20	70.00
07/15/24	DNR	UPDATE COMPLIANCE TEAM ON ALEDO WELL FILES TO RAILROAD COMMISSION OF TEXAS.	B210	0.10	35.00
07/15/24	DNR	CORRESPONDENCE TO SEC COUNSEL REGARDING BANK RECORDS.	B110	0.10	35.00



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07/16/24	DNR	REVIEW AND PROCESS W-9S WITH SUPPORTING DOCUMENTATION; SEND TO STRETTO.	B110	1.50	525.00
07/16/24	DNR	CORRESPONDENCE TO FARMEE AND COUNSEL REGARDING STATUS OF PAYMENT TO GULF COAST FOR AMOUNTS OWED BY SDMB.	B210	0.10	35.00
07/16/24	DNR	REVIEW AND RESPOND TO INVESTOR INQUIRIES.	B110	1.80	630.00
07/16/24	DNR	PROCESS VENDOR INVOICES.	B210	0.20	70.00
07/16/24	DNR	TELEPHONE CONFERENCE WITH SHIPPING VENDOR REGARDING BOXES TO RAILROAD COMMISSION OF TEXAS OF WELL FILES.	B210	0.10	35.00
07/16/24	DNR	CORRESPONDENCE TO OFFICE OF ATTORNEY GENERAL REGARDING BOXES TO RAILROAD COMMISSION OF TEXAS OF BATCH ONE OF ABANDONED WELL FILES.	B210	0.10	35.00
07/16/24	DNR	CORRESPONDENCE WITH SHIPPING VENDOR REGARDING WELL FILE BOXES TO RAILROAD COMMISSION OF TEXAS.	B210	0.40	140.00
07/16/24	DNR	CORRESPONDENCE TO DEBORAH D. WILLIAMSON REGARDING DRAFT QUARTERLY REPORT.	BT155	0.10	35.00
07/16/24	DNR	CORRESPONDENCE WITH CONTRACT PUMPER REGARDING ELECTRA WELL FILES AND LOGS.	B210	0.50	175.00
07/16/24	DNR	CORRESPONDENCE TO AHUJA & CONSULTANTS REGARDING WOLFEPAK PARTIAL REFUND.	B210	0.10	35.00
07/16/24	DNR	CORRESPONDENCE WITH CONTRACT PUMPER REGARDING ALEDO WELL FILES AND SHIPPING ITEMS.	B210	0.20	70.00
07/16/24	DNR	REVISE, FINALIZE, AND FILE 2Q2024 QUARTERLY REPORT.	BT155	1.70	595.00
07/16/24	DNR	CORRESPONDENCE WITH AHUJA & CONSULTANTS REGARDING HEARTLAND PORTAL.	B210	0.40	140.00
07/16/24	DNR	CORRESPONDENCE WITH DEBORAH D. WILLIAMSON AND CONTRACT OPERATOR REGARDING INSURANCE RENEWAL QUOTE.	B210	0.40	140.00
07/16/24	DNR	CORRESPONDENCE WITH SEC COUNSEL REGARDING HEARTLAND PORTAL.	B110	0.40	140.00
07/16/24	DNR	UPDATE WEBSITE CONTENT.	B210	0.30	105.00
07/16/24	TED	ADDRESS INVESTOR INQUIRIES.	B110	0.50	128.25
07/17/24	DNR	PROCESS VENDOR INVOICES.	B210	0.50	175.00
07/17/24	DNR	CALL WITH VAL VERDE COUNTY CLERK'S OFFICE REGARDING PROPERTY RECORDS.	B210	0.10	35.00



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07/17/24	DNR	CALL WITH CROCKETT COUNTY CLERK'S OFFICE REGARDING PROPERTY RECORDS.	B210	0.10	35.00
07/17/24	DNR	CORRESPONDENCE WITH CONTRACT PUMPER REGARDING WELL FILES AND LOGS.	B210	0.70	245.00
07/17/24	DNR	PREPARE AND ISSUE PACKAGES FOR RECORDING TO VAL VERDE COUNTY AND CROCKETT COUNTY REGARDING ASSIGNMENT REGARDING FARMOUT AGREEMENT.	B130	0.80	280.00
07/17/24	DNR	DISCUSS WITH DEBORAH D. WILLIAMSON VARIOUS ADMINISTRATIVE, OPERATIONAL, AND OUTSTANDING FARMOUT ITEMS.	B210	0.70	245.00
07/17/24	DNR	CORRESPONDENCE WITH SEC COUNSEL REGARDING HEARTLAND PORTAL.	B110	0.20	70.00
07/17/24	DNR	REVIEW AND PROCESS W-9S; SEND TO STRETTO.	B110	1.20	420.00
07/17/24	DNR	REVIEW AND RESPOND TO INVESTOR INQUIRIES.	B110	1.00	350.00
07/17/24	DNR	CORRESPONDENCE TO OIL AND GAS COUNSEL REGARDING RECORDINGS REGARDING FARMOUT.	B210	0.10	35.00
07/17/24	DNR	CORRESPONDENCE WITH DEBORAH D. WILLIAMSON REGARDING DATA HOSTING WIRES.	B210	0.10	35.00
07/17/24	DNR	DRAFT DATA HOSTING WIRES FOR REMAINDER OF 2024.	B210	0.30	105.00
07/17/24	DNR	CORRESPONDENCE WITH INVESTOR COUNSEL REGARDING DISTRIBUTION QUESTIONS.	B110	0.20	70.00
07/17/24	DNR	CORRESPONDENCE TO AUCTIONEER REGARDING JULY 18, 2024 AUCTION.	B130	0.10	35.00
07/17/24	DNR	DRAFT NOTICE OF TERMINATION OF HOSTING SERVICES.	B210	0.10	35.00
07/17/24	DNR	CORRESPONDENCE TO YAIR BARAHONA REGARDING DATA HOSTING TERMINATION.	B210	0.10	35.00
07/17/24	DNR	DRAFT RECEIVER'S REPORT REGARDING JULY AUCTION.	B130	0.40	140.00
07/17/24	DNR	CORRESPONDENCE TO DEBORAH D. WILLIAMSON REGARDING UPDATE ON JULY AUCTION.	B130	0.10	35.00
07/17/24	DNR	CORRESPONDENCE WITH DEBORAH D. WILLIAMSON REGARDING BANK ACCOUNTS.	B210	0.20	70.00
07/17/24	DNR	CORRESPONDENCE WITH STRETTO REGARDING W-9 REPORT.	B110	0.20	70.00
07/17/24	DNR	CORRESPONDENCE WITH AHUJA & CONSULTANTS REGARDING DISTRIBUTION CALCULATION.	B130	0.20	70.00
07/17/24	DNR	CORRESPONDENCE TO VICKI PALMOUR CONSULTANTS REGARDING ROYALTY SPREADSHEET FOR SDMB.	B210	0.10	35.00



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07/17/24	DNR	CORRESPONDENCE WITH STRETTO REGARDING DISTRIBUTION LOGISTICS.	B130	0.30	105.00
07/17/24	DNR	CORRESPONDENCE WITH STRETTO AND DEBORAH D. WILLIAMSON REGARDING DECEASED CLAIMANT AND DISTRIBUTION ITEMS.	B130	0.30	105.00
07/17/24	DNR	CORRESPONDENCE FROM AHUJA & CONSULTANTS REGARDING IRS POWER OF ATTORNEY DOCUMENTS.	B240	0.10	35.00
07/17/24	DNR	CORRESPONDENCE WITH CONTRACT PUMPER REGARDING INVOICE FOR ABANDONED WELL FILES AND BOXES.	B210	0.20	70.00
07/17/24	TED	ADDRESS INVESTOR INQUIRIES.	B110	0.40	102.60
07/18/24	DNR	CORRESPONDENCE WITH VICKI PALMOUR CONSULTING REGARDING GULF COAST STATEMENTS AND SDMB ROYALTY OWED.	B210	0.50	175.00
07/18/24	DNR	CORRESPONDENCE WITH COMPLIANCE TEAM REGARDING INSURANCE RENEWAL STATUS AND QUOTE.	B210	0.40	140.00
07/18/24	DNR	REVIEW AND RESPOND TO INVESTOR AND VENDOR INQUIRIES.	B110	1.50	525.00
07/18/24	DNR	REVIEW AND PROCESS W-9S; SEND TO STRETTO.	B110	0.80	280.00
07/18/24	DNR	REVIEW FARMOUT ROYALTY SPREADSHEET FROM VICKI PALMOUR CONSULTING.	B210	0.20	70.00
07/18/24	DNR	CORRESPONDENCE WITH STRETTO REGARDING W-9 REPORT.	B130	0.20	70.00
07/18/24	DNR	CORRESPONDENCE WITH ALLOWED CLAIMANTS IN CLASS 5 REGARDING W-9 REQUIREMENTS AND SUBMISSION OF SAME TO RECEIVE DISTRIBUTION.	B130	0.80	280.00
07/18/24	DNR	RECEIVE AND REVIEW NON-ABANDONED WELL LOGS AND FILE LIST FROM CONTRACT PUMPER.	B210	0.40	140.00
07/18/24	DNR	CORRESPONDENCE WITH OIL AND GAS COUNSEL AND CONTRACT OPERATOR REGARDING NON-ABANDONED WELL LOG LIST AND ITEMS ON SAME.	B210	0.60	210.00
07/18/24	DNR	CORRESPONDENCE WITH CONTRACT PUMPER REGARDING ELECTRA STORAGE UNIT.	B210	0.30	105.00
07/18/24	DNR	REVIEW AND MARK COMMENTS ON W-9 REPORT FOR CLASS 5.	B130	0.20	70.00
07/18/24	DNR	REVIEW IRS FORMS FROM AHUJA & CONSULTANTS REGARDING INCOME AND PAYROLL TAX TRANSCRIPTS.	B240	0.90	315.00
07/18/24	DNR	CORRESPONDENCE WITH DEBORAH D. WILLIAMSON REGARDING ELECTRA STORAGE UNIT.	B210	0.30	105.00
07/18/24	DNR	REVIEW ELECTRA STORAGE UNIT RENTAL AGREEMENT.	B210	0.10	35.00



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07/18/24	DNR	REVIEW AND PROCESS RECEIVER'S MAIL.	B210	0.20	70.00
07/19/24	VEF1	DRAFT TWELFTH QUARTERLY REPORT FOR PERIOD JULY 2024 THROUGH SEPTEMBER 2024.	B110	0.30	45.90
07/19/24	DNR	CORRESPONDENCE WITH COMPLIANCE TEAM REGARDING INSURANCE RENEWAL ITEMS.	B210	0.50	175.00
07/19/24	DNR	RECEIVE AND PROCESS W-9S; SEND TO STRETTO.	B110	1.40	490.00
07/19/24	DNR	RECEIVE AND REVIEW GROSS SALES STATEMENT FROM AUCTIONEER.	B130	0.30	105.00
07/19/24	DNR	REVIEW AND RESPOND TO INVESTOR INQUIRIES.	B110	0.60	210.00
07/19/24	DNR	CORRESPONDENCE WITH CONTRACT OPERATOR, CONTRACT PUMPER, AND OIL AND GAS COUNSEL REGARDING ELECTRA WELL LOGS AND FILES AND RELATED ISSUES ON SAME.	B130	1.00	350.00
07/19/24	DNR	CORRESPONDENCE WITH BROKER REGARDING RENEWAL OF INSURANCE POLICY.	B210	0.30	105.00
07/19/24	DNR	PROCESS IRS POWER OF ATTORNEYS FOR SUBMISSION BY AHUJA & CONSULTANTS.	B240	0.50	175.00
07/19/24	DNR	CORRESPONDENCE WITH AHUJA & CONSULTANTS REGARDING IRS POWER OF ATTORNEYS FOR INCOME AND PAYROLL TAXES.	B240	0.20	70.00
07/19/24	DNR	RECEIVE AND REVIEW CORRESPONDENCE FROM IOWA INSURANCE DIVISION REGARDING RECORDS REQUEST OF RECEIVER.	BT160	0.40	140.00
07/19/24	DNR	CORRESPONDENCE WITH SEC COUNSEL REGARDING RECORDS REQUEST.	B110	0.20	70.00
07/19/24	DNR	CORRESPONDENCE WITH IOWA INSURANCE DIVISION COUNSEL REGARDING RECORDS REQUEST.	BT160	0.20	70.00
07/19/24	DNR	REVIEW INSURANCE RENEWAL QUOTE.	B210	0.10	35.00
07/19/24	DNR	REVIEW AND PROCESS RECEIVER'S MAIL.	B210	0.20	70.00
07/19/24	TED	ADDRESS INVESTOR INQUIRIES	B110	0.40	102.60
07/22/24	DNR	ANALYZE BANK DOCUMENTS OF RECEIVERSHIP PARTIES.	B120	0.80	280.00
07/22/24	DNR	REVIEW AND RESPOND TO INVESTOR AND VENDOR INQUIRIES.	B110	2.00	700.00
07/22/24	DNR	CORRESPONDENCE WITH STRETTO REGARDING INVESTOR ESTATE DOCUMENTATION AND ISSUES ON SAME.	B110	0.20	70.00
07/22/24	DNR	REVIEW AND PROCESS W-9S WITH SUPPORTING DOCUMENTATION; SEND TO STRETTO.	B110	1.30	455.00
07/22/24	DNR	CORRESPONDENCE WITH CONTRACT PUMPER AND CONTRACT	B210	0.40	140.00



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		OPERATOR REGARDING ELECTRA WELL LOGS AND FILES.			
07/22/24	DNR	CORRESPONDENCE WITH DEBORAH D. WILLIAMSON REGARDING INVESTOR CORRESPONDENCE RECEIVED REGARDING DISTRIBUTIONS.	B110	0.30	105.00
07/22/24	DNR	CORRESPONDENCE TO SEC COUNSEL REGARDING INVESTOR CORRESPONDENCE REGARDING DISTRIBUTIONS.	B110	0.10	35.00
07/22/24	DNR	CORRESPONDENCE TO AHUJA & CONSULTANTS AND STRETTO REGARDING DISTRIBUTION CORRESPONDENCE FOR CERTAIN INVESTOR.	B130	0.20	70.00
07/22/24	DNR	CORRESPONDENCE WITH BROKER REGARDING INSURANCE RENEWAL.	B210	0.30	105.00
07/22/24	DNR	CORRESPONDENCE WITH DEBORAH D. WILLIAMSON REGARDING INSURANCE RENEWAL.	B210	0.10	35.00
07/22/24	DNR	PREPARE INSURANCE RENEWAL PAPERWORK FOR APPROVAL BY RECEIVER.	B210	0.20	70.00
07/22/24	DNR	CORRESPONDENCE WITH DEBORAH D. WILLIAMSON REGARDING JULY 18, 2024 AUCTION.	B130	0.40	140.00
07/22/24	DNR	ANALYZE DISTRIBUTION INFORMATION FOR CERTAIN INVESTORS.	B130	0.60	210.00
07/22/24	DNR	DRAFT AND SEND LETTER TO IOWA INSURANCE DIVISION REGARDING INFORMATION REQUESTED.	B110	0.50	175.00
07/22/24	DNR	CORRESPONDENCE WITH SEC COUNSEL REGARDING BANK DOCUMENT PRODUCTION.	B110	0.30	105.00
07/22/24	DNR	CORRESPONDENCE WITH AHUJA & CONSULTANTS REGARDING BANK RECORDS.	B120	0.40	140.00
07/22/24	DNR	CORRESPONDENCE WITH DEBORAH D. WILLIAMSON REGARDING ELECTRA STORAGE UNIT AND FILES.	B210	0.30	105.00
07/22/24	DNR	CORRESPONDENCE WITH COMPLIANCE TEAM REGARDING ABANDONED WELL LOGS AND FILES IN ELECTRA.	B130	0.30	105.00
07/22/24	DNR	CORRESPONDENCE TO CONTRACT OPERATOR REGARDING TERMINATION OF ELECTRA STORAGE UNIT.	B210	0.10	35.00
07/22/24	DNR	DRAFT AND SEND LETTER OF TERMINATION OF STORAGE UNIT AGREEMENT REGARDING ELECTRA.	B210	0.40	140.00
07/22/24	DNR	CORRESPONDENCE WITH STORAGE OWNER REGARDING ELECTRA TERMINATION NOTICE.	B210	0.10	35.00
07/22/24	DNR	RECEIVE AND REVIEW RENEWAL POLICY FOR INSURANCE; SEND TO OIL AND GAS COUNSEL.	B210	0.30	105.00



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07/22/24	DNR	CORRESPONDENCE WITH DEBORAH D. WILLIAMSON REGARDING DISTRIBUTION BLURB.	B130	0.10	35.00
07/22/24	DNR	CORRESPONDENCE TO VICKI PALMOUR CONSULTING AND STRETTO REGARDING NON-INVESTOR ADDRESS UPDATE.	B110	0.10	35.00
07/22/24	DNR	CORRESPONDENCE TO OFFICE OF ATTORNEY GENERAL REGARDING RAILROAD COMMISSION LETTER REGARDING LEADING EDGE BOND.	B210	0.10	35.00
07/22/24	DNR	REVIEW AND PROCESS RECEIVER'S MAIL.	B210	0.40	140.00
07/22/24	TED	ADDRESS INVESTOR INQUIRIES.	B110	0.20	51.30
07/23/24	DNR	REVIEW AND RESPOND TO INVESTOR INQUIRIES.	B110	0.60	210.00
07/23/24	DNR	REVIEW AND PROCESS W-9S; SEND TO STRETTO.	B110	1.00	350.00
07/23/24	DNR	CORRESPONDENCE WITH STRETTO REGARDING DISTRIBUTION LOGISTICS.	B130	0.20	70.00
07/23/24	DNR	CORRESPONDENCE WITH DEBORAH D. WILLIAMSON REGARDING INFORMATION REQUEST.	B110	0.40	140.00
07/23/24	DNR	REVISE LETTER IN RESPONSE TO INFORMATION REQUEST OF RECEIVER.	B110	0.40	140.00
07/23/24	DNR	CORRESPONDENCE WITH DEBORAH D. WILLIAMSON REGARDING DISTRIBUTION CALCULATION EXPLANATIONS AND COMMENTS ON SAME.	B130	0.40	140.00
07/23/24	DNR	DRAFT AND FINALIZE DISTRIBUTION CALCULATION EXPLANATION FOR CLASS 4 AND CLASS 5 CREDITORS.	B130	1.00	350.00
07/23/24	DNR	CORRESPONDENCE WITH AHUJA & CONSULTANTS AND DEBORAH D. WILLIAMSON REGARDING TAX CALL.	B240	0.30	105.00
07/23/24	DNR	CORRESPONDENCE WITH DEBORAH D. WILLIAMSON, AHUJA & CONSULTANTS, AND STRETTO REGARDING DISTRIBUTION CALCULATION EXPLANATION AND COMMENTS ON SAME.	B130	0.50	175.00
07/23/24	DNR	CORRESPONDENCE WITH DEBORAH D. WILLIAMSON REGARDING DISTRIBUTION PACKAGES.	B130	0.20	70.00
07/23/24	DNR	CORRESPONDENCE TO IOWA REGULATORY COUNSEL REGARDING INFORMATION REQUEST RESPONSE.	B110	0.10	35.00
07/23/24	DNR	CORRESPONDENCE WITH STRETTO REGARDING UPDATED DISTRIBUTION REPORT AND ISSUES ON SAME.	B130	0.50	175.00
07/23/24	DNR	REVIEW AND PROVIDE COMMENTS TO UPDATED DISTRIBUTION REPORT.	B130	0.20	70.00
07/23/24	DNR	CORRESPONDENCE WITH DEBORAH D. WILLIAMSON	B110	0.20	70.00



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DEBORAH WILLIAMSON

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DATE	ID	DESCRIPTION	TASK	HOURS	AMOUNT
		REGARDING W-9 AND ESTATE PAPERWORK ISSUES.			
07/23/24	DNR	DRAFT AND SEND LETTER TO PURPORTED ESTATE AGENT REGARDING W-9 SUBMISSION AND ADDITIONAL DOCUMENTATION REQUIRED.	B110	0.30	105.00
07/23/24	DNR	CORRESPONDENCE TO COMPLIANCE TEAM REGARDING RAILROAD COMMISSION OF TEXAS MAIL RECEIVED.	B210	0.10	35.00
07/23/24	DNR	REVIEW AND PROCESS RECEIVER'S MAIL.	B210	0.30	105.00
07/23/24	DNR	CORRESPONDENCE WITH DEBORAH D. WILLIAMSON AND AHUJA & CONSULTANTS REGARDING BAHAMAS PAYMENTS AND BANK RECORDS.	B120	0.60	210.00
07/23/24	DNR	RECEIVE AND REVIEW UNEMPLOYMENT WAGES REPORTS, BALANCE SHEET AND OTHER REGISTER DOCUMENTS, EMPLOYMENT DOCUMENTS, AND PAYROLL RECORDS FROM VICKI PALMOUR CONSULTING IN WOLFEPACK; SEND TO AHUJA & CONSULTANTS.	B210	0.80	280.00
07/24/24	DNR	REVIEW AND RESPOND TO INVESTOR INQUIRIES.	B110	1.40	490.00
07/24/24	DNR	CORRESPONDENCE WITH COMPLIANCE TEAM REGARDING RAILROAD COMMISSION OF TEXAS MAIL RESPONSE.	B210	0.30	105.00
07/24/24	DNR	CORRESPONDENCE WITH STRETTO REGARDING INVESTOR INQUIRY SUBMITTED.	B110	0.40	140.00
07/24/24	DNR	CORRESPONDENCE WITH DEBORAH D. WILLIAMSON AND AHUJA & CONSULTANTS REGARDING BAHAMAS PAYMENTS AND BANK RECORDS.	B120	0.30	105.00
07/24/24	DNR	CORRESPONDENCE WITH DEBORAH D. WILLIAMSON REGARDING WEBSITE CONTENT.	B110	0.20	70.00
07/24/24	DNR	CORRESPONDENCE WITH WAB REGARDING BANK ACCOUNT ITEMS.	B210	0.20	70.00
07/24/24	DNR	REVISE DRAFT OF DISTRIBUTION EXPLANATION FOR WEBSITE CONTENT.	B110	0.30	105.00
07/24/24	DNR	CORRESPONDENCE WITH STRETTO REGARDING W-9 REPORT.	B110	0.20	70.00
07/24/24	DNR	CORRESPONDENCE TO STRETTO REGARDING DISTRIBUTION PACKAGE COVER LETTER ITEMS.	B130	0.10	35.00
07/24/24	DNR	UPDATE WEBSITE CONTENT.	B110	0.40	140.00
07/24/24	DNR	REVIEW AND PROCESS W-9S; SEND TO STRETTO.	B110	0.50	175.00
07/24/24	DNR	TELEPHONE CONFERENCE AND CORRESPONDENCE WITH ALLOWED NON-INVESTOR CLAIMANT REGARDING W-9 REQUIREMENT.	B110	0.20	70.00



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DEBORAH WILLIAMSON

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DATE	ID	DESCRIPTION	TASK	HOURS	AMOUNT
07/24/24	DNR	REVIEW W-9 REPORT FROM STRETTO.	B130	0.10	35.00
07/24/24	DNR	REVIEW COURT'S JULY 24, 2024 ORDER.	B110	0.10	35.00
07/24/24	DNR	PREPARE AND FILE NOTICE OF AUGUST 15, 2024 HEARING AND SERVICE OF COURT ORDER.	B110	0.30	105.00
07/24/24	DNR	CORRESPONDENCE TO LOCAL COUNSEL REGARDING AUGUST 15, 2024 HEARING.	B110	0.10	35.00
07/24/24	TED	ADDRESS INVESTOR INQUIRIES	B110	1.50	384.75
07/25/24	DNR	REVIEW AND RESPOND TO INVESTOR AND VENDOR INQUIRIES.	B110	1.20	420.00
07/25/24	DNR	REVIEW AND PROCESS W-9S; SEND TO STRETTO.	B110	0.60	210.00
07/25/24	DNR	CORRESPONDENCE WITH DEBORAH D. WILLIAMSON REGARDING AUCTION SETTLEMENT STATEMENT.	B130	0.40	140.00
07/25/24	DNR	DRAFT LENGTHY CORRESPONDENCE TO ALLOWED CLAIMANT'S COUNSEL REGARDING W-9 REQUIREMENT AND CLIENT AUTHORIZATION REQUIRED BY RECEIVER.	B110	0.20	70.00
07/25/24	DNR	CORRESPONDENCE WITH DEBORAH D. WILLIAMSON REGARDING ALLOWED CLAIMANT COUNSEL CORRESPONDENCE.	B110	0.40	140.00
07/25/24	DNR	CORRESPONDENCE WITH DEBORAH D. WILLIAMSON REGARDING COVER LETTER FOR DISTRIBUTION PACKAGES AND COMMENTS ON SAME.	B130	0.30	105.00
07/25/24	DNR	TELEPHONE CONFERENCE WITH ALLOWED VENDOR CLAIMANT REGARDING W-9 REQUIREMENT.	B110	0.10	35.00
07/25/24	DNR	CALL WITH ALLOWED CLAIMANT REGARDING COURT ORDER REQUIRING W-9 AND DISTRIBUTION PLAN.	B110	0.10	35.00
07/25/24	DNR	CORRESPONDENCE WITH AUCTIONEER REGARDING NET SETTLEMENT STATEMENT AND QUESTIONS ON SAME.	B130	0.60	210.00
07/25/24	DNR	CORRESPONDENCE WITH DEBORAH D.WILLIAMSON AND AHUJA & CONSULTANTS REGARDING BAHAMAS TRACING.	B120	0.20	70.00
07/25/24	DNR	REVIEW DRAFT NET SETTLEMENT STATEMENT FROM AUCTIONEER.	B130	0.20	70.00
07/25/24	DNR	DRAFT AND REVISE COVER LETTER FOR DISTRIBUTION CHECK PACKAGES DETAILING COURT-APPROVED DISTRIBUTION PLAN AND CALCULATION OF DISBURSEMENTS FOR VARIOUS CLASS ALLOWED CLAIMANTS.	B130	1.50	525.00
07/25/24	DNR	CORRESPONDENCE WITH STRETTO REGARDING WAB ACCOUNTS AND DISTRIBUTION PACKAGE PREPARATION ITEMS.	B130	0.30	105.00



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DATE	ID	DESCRIPTION	TASK	HOURS	AMOUNT
07/25/24	DNR	CORRESPONDENCE TO AHUJA & CONSULTANTS REGARDING DISTRIBUTION QUESTION REGARDING TAX PURPOSES.	B240	0.10	35.00
07/26/24	DNR	REVIEW AND PROCESS W-9S; SEND TO STRETTO.	B110	0.60	210.00
07/26/24	DNR	CORRESPONDENCE WITH FARMEE AND COUNSEL REGARDING STATUS OF PAYMENT OF OUTSTANDING AMOUNTS OWED TO GULF COAST.	B210	0.40	140.00
07/26/24	DNR	DRAFT LENGTHY CORRESPONDENCE TO OFFICE OF ATTORNEY GENERAL REGARDING RAILROAD COMMISSION OF TEXAS NOTICE OF DEFICIENT AND OIL AND GAS DOCKETS MAIL RECEIVED POST-ABANDONMENT FOR DODSON PRAIRIE.	B210	0.30	105.00
07/26/24	DNR	CORRESPONDENCE FROM TX OFFICE OF ATTORNEY GENERAL REGARDING LEADING EDGE BOND DEMAND.	B210	0.10	35.00
07/26/24	DNR	CORRESPONDENCE WITH DEBORAH D. WILLIAMSON AND CONTRACT PUMPER REGARDING ABANDONED WELL LOGS AND FILES TO RAILROAD COMMISSION OF TEXAS.	B210	0.60	210.00
07/26/24	DNR	CORRESPONDENCE TO DEBORAH D. WILLIAMSON REGARDING 3Q2024 QUARTERLY REPORT.	BT155	0.10	35.00
07/26/24	DNR	DRAFT 3Q2024 QUARTERLY REPORT.	BT155	1.50	525.00
07/26/24	DNR	CORRESPONDENCE WITH DEBORAH D. WILLIAMSON AND AHUJA & CONSULTANTS REGARDING DISTRIBUTION QUESTIONS.	B130	0.10	35.00
07/26/24	DNR	CORRESPONDENCE TO AHUJA & CONSULTANTS AND STRETTO REGARDING CERTAIN ALLOWED CLAIMANT DISTRIBUTION ITEMS.	B130	0.10	35.00
07/26/24	DNR	CORRESPONDENCE TO JOHN ROGERS' COUNSEL REGARDING W-9 REQUIREMENT AND DISTRIBUTION ITEMS OUTSTANDING FROM CLIENT.	B110	0.10	35.00
07/26/24	DNR	CORRESPONDENCE TO DEBORAH D. WILLIAMSON AND OIL AND GAS COUNSEL REGARDING UPDATE ON AMOUNTS OWED BY SDMB TO GULF COAST.	B210	0.10	35.00
07/26/24	DNR	CORRESPONDENCE WITH STRETTO AND DEBORAH D. WILLIAMSON REGARDING DISTRIBUTION LOGISTICS AND MATERIALS FOR SAME.	B130	0.30	105.00
07/26/24	DNR	REVIEW AND RESPOND TO INVESTOR INQUIRIES.	B110	0.40	140.00
07/26/24	DNR	CORRESPONDENCE WITH AUCTIONEER REGARDING AUCTION SETTLEMENT STATEMENT QUESTIONS.	B130	0.40	140.00
07/26/24	DNR	UPDATE DEBORAH D. WILLIAMSON ON AUCTION SETTLEMENT STATEMENT ITEMS AND DISCUSS REPORTING ON SAME.	B130	0.40	140.00



DEBORAH D WILLIAMSON
DEBORAH WILLIAMSON

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DATE	ID	DESCRIPTION	TASK	HOURS	AMOUNT
07/26/24	DNR	CORRESPONDENCE FROM WAB REGARDING ACCOUNT ANALYSIS QUESTIONS.	B210	0.10	35.00
07/26/24	DNR	REVISE AND FILE JULY 18, 2024 AUCTION REPORT.	B130	0.30	105.00
07/26/24	DNR	UPDATE WEBSITE CONTENT.	B110	0.30	105.00
07/26/24	TED	ADDRESS INVESTOR INQUIRIES	B110	0.20	51.30
07/27/24	DNR	TELEPHONE CONFERENCE WITH SHIPPING VENDOR REGARDING BOXES TO RAILROAD COMMISSION OF TEXAS FROM ELECTRA.	B210	0.20	70.00
07/27/24	DNR	UPDATE DEBORAH D. WILLIAMSON ON TURNOVER OF BOXES TO RAILROAD COMMISSION OF TEXAS FROM ELECTRA.	B210	0.10	35.00
07/27/24	DNR	CORRESPONDENCE WITH CONTRACT PUMPER REGARDING RAILROAD COMMISSION OF TEXAS BOXES TO ELECTRA.	B210	0.20	70.00
07/29/24	DNR	REVIEW AND RESPOND TO INVESTOR INQUIRIES.	B110	0.60	210.00
07/29/24	DNR	REVIEW AND PROCESS W-9S; SEND TO STRETTO.	B110	0.30	105.00
07/29/24	DNR	CORRESPONDENCE WITH OFFICE OF ATTORNEY GENERAL REGARDING BOXES TO RAILROAD COMMISSION OF TEXAS FROM ELECTRA.	B210	0.20	70.00
07/29/24	DNR	RECEIVE AND PROCESS INVOICE FROM CONTRACT PUMPER REGARDING ELECTRA BOXES TO RAILROAD COMMISSION OF TEXAS.	B210	0.20	70.00
07/29/24	DNR	CORRESPONDENCE WITH OIL AND GAS COUNSEL AND DEBORAH D. WILLIAMSON REGARDING RAILROAD COMMISSION OF TEXAS MAIL RECEIVED AND ORIGINAL COMPLAINTS.	B210	0.30	105.00
07/29/24	DNR	REVIEW AND PROCESS RECEIVER'S MAIL, INCLUDING NUMEROUS RAILROAD COMMISSION OF TEXAS NOTICES AND CORRESPONDENCE.	B210	1.20	420.00
07/29/24	DNR	REVIEW AND RESPOND TO INVESTOR INQUIRIES.	B110	1.00	350.00
07/29/24	DNR	REVIEW AND PROCESS W-9S; SEND TO STRETTO.	B110	1.00	350.00
07/29/24	DNR	CORRESPONDENCE WITH CONTRACT PUMPER REGARDING INVOICE AND ELECTRA STORAGE UNIT.	B210	0.20	70.00
07/29/24	DNR	CORRESPONDENCE WITH STRETTO REGARDING COVER LETTER FOR DISTRIBUTION CHECK PACKAGES.	B130	0.20	70.00
07/29/24	DNR	CORRESPONDENCE TO DEBORAH D. WILLIAMSON REGARDING CLAIM AMOUNT SPREADSHEET.	B310	0.10	35.00
07/29/24	DNR	CORRESPONDENCE WITH OFFICE OF ATTORNEY GENERAL REGARDING RAILROAD COMMISSION OF TEXAS ORIGINAL	B210	0.20	70.00



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DEBORAH WILLIAMSON

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DATE	ID	DESCRIPTION	TASK	HOURS	AMOUNT
		COMPLAINTS ISSUED.			
07/29/24	DNR	CORRESPONDENCE WITH DEBORAH D. WILLIAMSON AND OIL AND GAS COUNSEL REGARDING RECORDED FARMOUT ASSIGNMENTS.	B210	0.10	35.00
07/29/24	DNR	RECEIVE AND REVIEW RECORDED FARMOUT ASSIGNMENTS.	B210	0.20	70.00
07/29/24	TED	ADDRESS INVESTOR INQUIRIES.	B110	0.10	25.65
07/30/24	DNR	CORRESPONDENCE WITH STRETTO REGARDING ESTATE PAPERWORK AND ITEMS REGARDING SPECIFIC INVESTOR CLAIMANT.	B110	0.30	105.00
07/30/24	DNR	RECEIVE AND REVIEW W-9S; SEND TO STRETTO.	B110	1.00	350.00
07/30/24	DNR	REVIEW AND RESPOND TO INVESTOR INQUIRIES.	B110	1.50	525.00
07/30/24	DNR	CORRESPONDENCE TO SEC COUNSEL REGARDING DISTRIBUTION TIMING AND LOGISTICS ITEMS.	B110	0.10	35.00
07/30/24	DNR	CALL WITH DEBORAH D. WILLIAMSON AND STRETTO REGARDING DISTRIBUTION LOGISTICS AND OUTSTANDING ITEMS.	B130	0.60	210.00
07/30/24	DNR	CORRESPONDENCE WITH ALLOWED CLAIMANT COUNSEL REGARDING SUBMISSION OF W-9 ITEMS.	B110	0.20	70.00
07/30/24	DNR	DRAFT LETTER TO ALLOWED CLAIMANTS IN CLASS 4A REGARDING W-9 SUBMISSION REQUIREMENT AND NO DISTRIBUTION WITHOUT RECEIPT OF SAME.	B130	0.60	210.00
07/30/24	DNR	REVISE COVER LETTER FOR DISTRIBUTION CHECK PACKAGES.	B130	0.10	35.00
07/30/24	DNR	CORRESPONDENCE WITH DEBORAH D. WILLIAMSON REGARDING LETTER TO ALLOWED CLAIMANTS WITHOUT W-9 RECEIVED.	B130	0.10	35.00
07/30/24	DNR	CORRESPONDENCE TO STRETTO REGARDING UPDATED COVER LETTER FOR DISTRIBUTION CHECK PACKAGES.	B130	0.10	35.00
07/30/24	DNR	REVISE AND FINALIZE LETTER TO CLASS 4A ALLOWED CLAIMANTS REGARDING W-9 NOT RECEIVED.	B110	0.20	70.00
07/30/24	DNR	CORRESPONDENCE WITH STRETTO REGARDING LETTER TO CLASS 4A CLAIMANTS WITHOUT W-9; REVIEW SPREADSHEET REGARDING SAME.	B110	0.40	140.00
07/30/24	DNR	CORRESPONDENCE WITH LOCAL COUNSEL REGARDING W-9 SUBMISSIONS AND INVESTOR INQUIRIES.	B110	0.20	70.00
07/30/24	TED	ADDRESS INVESTOR INQUIRIES.	B110	0.10	25.65
07/31/24	DNR	RECEIVE AND PROCESS W-9S; SEND TO STRETTO.	B110	0.30	105.00



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DEBORAH WILLIAMSON

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DATE	ID	DESCRIPTION	TASK	HOURS	AMOUNT
07/31/24	DNR	CORRESPONDENCE WITH STRETTO REGARDING MAILING TO CERTAIN CLASS 4A CLAIMANTS.	B110	0.20	70.00
07/31/24	DNR	CORRESPONDENCE WITH DEBORAH D. WILLIAMSON REGARDING FARMOUT.	B210	0.30	105.00
07/31/24	TED	ADDRESS INVESTOR INQUIRIES.	B110	0.20	51.30
		TOTAL		142.80	\$49,785.30



DEBORAH D WILLIAMSON
DEBORAH WILLIAMSON

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BILLING SUMMARY

ID	TIMEKEEPER	TITLE	HOURS	RATE	AMOUNT
MGC	MICHAEL G. CUMMING	MEMBER	0.80	648.00	518.40
DNR	DANIELLE R. BEHREND	PARTICIPATING MEMBER	137.70	350.00	48,195.00
TED	THERESA E. DICK	PARALEGAL	4.00	256.50	1,026.00
VEF1	VICKI FLORES	PARALEGAL	0.30	153.00	45.90
TOTAL			142.80		\$49,785.30



DEBORAH D WILLIAMSON
DEBORAH WILLIAMSON

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DISBURSEMENTS

DATE	DESCRIPTION	QUANTITY	RATE	AMOUNT
	FEDERAL EXPRESS/DELIVERY	2.00	20.78	41.55
	PHOTOCOPIES	21.00	0.10	2.10
	PRINTING EXPENSES	667.00	0.10	66.70
	RELATIVITY DATA HOSTING	1.00	3,320.00	3,320.00
	SCANNING	313.00	0.10	31.30
	TOTAL DISBURSEMENTS			3,462.65



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DEBORAH WILLIAMSON

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TASK SUMMARY

TASK	TASK DESCRIPTION	HOURS	AMOUNT
B110	CASE ADMINISTRATION	64.20	22,036.90
B120	ASSET ANALYSIS AND RECOVERY	2.80	980.00
B130	ASSET DISPOSITION	19.80	6,959.80
B210	BUSINESS OPERATIONS	29.70	10,395.00
B240	TAX ISSUES	13.10	4,793.60
B310	CLAIMS ADMINISTRATION & OBJECT	3.50	1,225.00
BT155	STATUS REPORTS	9.10	3,185.00
BT160	LITIGATION CONSULTING	0.60	210.00
TOTAL		142.80	49,785.30

EXPENSE SUMMARY

PHOTOCOPIES	2.10
SCANNING	31.30
PRINTING EXPENSES	66.70
FEDERAL EXPRESS/DELIVERY	41.55
RELATIVITY DATA HOSTING	3,320.00
TOTAL	3,462.65



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

DUE UPON RECEIPT

OCTOBER 31, 2024
MATTER #: 122686.000002
INVOICE #: 3613587

FOR PROFESSIONAL SERVICES RENDERED

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

FEES	\$	36,822.40
DISBURSEMENTS		3,334.30
INVOICE TOTAL	\$	40,156.70



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

DATE	ID	DESCRIPTION	TASK	HOURS	AMOUNT
08/01/24	DNR	CORRESPONDENCE FROM DEBORAH D. WILLIAMSON REGARDING FARMOUT UPDATE.	B210	0.10	35.00
08/01/24	DNR	REVIEW FARMEE UPDATE.	B210	0.30	105.00
08/01/24	DNR	CORRESPONDENCE TO SEC COUNSEL REGARDING FARMEE UPDATE.	B110	0.10	35.00
08/01/24	DNR	REVIEW AND RESPOND TO INVESTOR INQUIRIES.	B110	0.80	280.00
08/01/24	DNR	CORRESPONDENCE WITH DEBORAH D. WILLIAMSON REGARDING INVESTOR INQUIRIES.	B110	0.20	70.00
08/01/24	DNR	CORRESPONDENCE WITH STRETTO REGARDING DISTRIBUTION ACCOUNTS.	B130	0.30	105.00
08/01/24	DNR	PROCESS BANK ACCOUNT ITEMS.	B210	0.10	35.00
08/01/24	DNR	REVIEW AND PROCESS W-9S; SEND TO STRETTO.	B110	0.30	105.00
08/01/24	DNR	COORDINATE OUTSTANDING DISTRIBUTION AND WEBSITE ISSUES WITH THERESA DICK AND ALANNA DOMINGUEZ.	B110	1.00	350.00
08/01/24	DNR	TELEPHONE CONFERENCE WITH WAB REGARDING DISTRIBUTION ACCOUNTS.	B210	0.20	70.00
08/01/24	DNR	REVIEW AND PROCESS RECEIVER'S MAIL.	B210	0.40	140.00
08/01/24	DNR	CORRESPONDENCE TO AHUJA & CONSULTANTS REGARDING CA FRANCHISE BOARD MAIL.	B240	0.10	35.00
08/01/24	DNR	RECEIVE AND REVIEW IBC BANK STATEMENT FOR JULY 2024; SEND TO AHUJA & CONSULTANTS.	B210	0.40	140.00
08/01/24	DNR	CORRESPONDENCE WITH STRETTO AND DEBORAH D. WILLIAMSON REGARDING NO W-9.	B110	0.30	105.00
08/01/24	AMDO	REVIEW AND RESPOND TO INVESTOR INQUIRIES.	B110	0.80	264.00
08/01/24	AMDO	COORDINATED OUTSTANDING WEBSITE AND EMAIL ISSUES.	B110	1.00	330.00
08/01/24	TED	ADDRESS INVESTOR INQUIRIES.	B110	0.20	51.30
08/01/24	TED	COORDINATE OUTSTANDING WEBSITE AND EMAIL ISSUES	B110	1.00	256.50
08/02/24	TED	ADDRESS INVESTOR INQUIRIES.	B110	0.30	76.95
08/02/24	DNR	CORRESPONDENCE WITH INVESTOR COUNSEL REGARDING DISTRIBUTIONS.	B110	0.30	105.00



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DEBORAH WILLIAMSON

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DATE	ID	DESCRIPTION	TASK	HOURS	AMOUNT
08/02/24	DNR	CORRESPONDENCE WITH DEBORAH D. WILLIAMSON REGARDING INVESTOR COUNSEL CORRESPONDENCE REGARDING DISTRIBUTIONS.	B130	0.20	70.00
08/02/24	DNR	CORRESPONDENCE TO STRETTO REGARDING ITEMS REGARDING CERTAIN INVESTOR DISTRIBUTIONS.	B130	0.10	35.00
08/02/24	DNR	CORRESPONDENCE WITH SEC COUNSEL REGARDING INVESTOR COUNSEL CORRESPONDENCE.	B110	0.20	70.00
08/02/24	DNR	REVIEW AND RESPOND TO INVESTOR INQUIRIES.	B110	1.70	595.00
08/02/24	DNR	REVIEW AND PROCESS W-9S; SEND TO STRETTO.	B110	0.80	280.00
08/02/24	DNR	TELEPHONE CONFERENCE WITH INVESTOR REGARDING INQUIRY ON CLAIMS PROCESS.	B110	0.20	70.00
08/02/24	DNR	CORRESPONDENCE TO STRETTO REGARDING REQUEST FOR UPDATING INVESTOR CONTACT INFORMATION.	B110	0.10	35.00
08/02/24	DNR	RECEIVE AND REVIEW UNREDACTED CERTIFICATE OF SERVICE FROM STRETTO REGARDING LETTER TO CLASS 4A CLAIMANTS REGARDING W-9 REQUIREMENT.	B130	0.30	105.00
08/05/24	AMDO	RESPOND TO INVESTOR INQUIRY.	B110	0.40	132.00
08/05/24	DNR	RECEIVE AND PROCESS W-9S; SEND TO STRETTO.	B110	1.00	350.00
08/05/24	DNR	REVIEW AND RESPOND TO INVESTOR INQUIRIES.	B110	1.20	420.00
08/05/24	DNR	CORRESPONDENCE WITH DEBORAH D. WILLIAMSON REGARDING DISTRIBUTION AND TIMELINE ITEMS.	B130	0.60	210.00
08/05/24	DNR	CORRESPONDENCE WITH SEC COUNSEL REGARDING DISTRIBUTION LOGISTICS.	B130	0.20	70.00
08/05/24	DNR	RECEIVE AND REVIEW ALL WAB JULY 2024 STATEMENTS; SEND TO AHUJA & CONSULTANTS.	B210	0.50	175.00
08/05/24	DNR	CORRESPONDENCE WITH STRETTO REGARDING CLAIM AND TRANSACTION SCHEDULE FOR INVESTOR.	B310	0.30	105.00
08/05/24	DNR	FINALIZE LETTER ACCOMPANYING DISTRIBUTION CHECK PACKAGES TO ALLOWED CLAIMANTS WITH W-9 RECEIVED.	B130	0.20	70.00
08/05/24	DNR	CORRESPONDENCE WITH DEBORAH D. WILLIAMSON AND STRETTO REGARDING DISTRIBUTION TIMELINE, NEXT STEPS, AND PACKAGES.	B130	0.10	35.00
08/05/24	DNR	CORRESPONDENCE WITH AHUJA & CONSULTANTS REGARDING OUTSTANDING ACCOUNTING AND TAX ITEMS.	B240	0.50	175.00
08/05/24	DNR	REVIEW AND PROCESS RECEIVER'S MAIL.	B130	0.60	210.00
08/05/24	DNR	CALL WITH DEBORAH D. WILLIAMSON REGARDING	B240	0.50	175.00



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DEBORAH WILLIAMSON

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DATE	ID	DESCRIPTION	TASK	HOURS	AMOUNT
		OUTSTANDING TAX AND ACCOUNTING ITEMS AND YEAR-END REPORTING.			
08/05/24	DNR	CORRESPONDENCE TO OIL AND GAS COUNSEL REGARDING RAILROAD COMMISSION MAIL RECEIVED.	B210	0.20	70.00
08/05/24	TED	ADDRESS INVESTOR INQUIRIES	B110	0.30	76.95
08/06/24	AMDO	REVIEW AND RESPOND TO INVESTOR INQUIRIES.	B110	0.50	165.00
08/06/24	TED	ADDRESS INVESTOR INQUIRIES	B110	2.00	513.00
08/07/24	AMDO	REVIEW AND RESPOND TO INVESTOR INQUIRIES.	B110	0.10	33.00
08/07/24	TED	ADDRESS INVESTOR INQUIRIES	B110	5.50	1,410.75
08/08/24	TED	ADDRESS INVESTOR INQUIRIES	B110	4.60	1,179.90
08/09/24	AMDO	REVIEW AND RESPOND TO INVESTOR INQUIRIES.	B110	0.90	297.00
08/09/24	TED	ADDRESS INVESTOR INQUIRIES	B110	5.10	1,308.15
08/12/24	AMDO	REVIEW AND RESPOND TO INVESTOR INQUIRIES.	B110	0.40	132.00
08/12/24	TED	ADDRESS INVESTOR INQUIRIES	B110	4.90	1,256.85
08/12/24	DNR	CORRESPONDENCE WITH AUCTIONEER REGARDING SALE PROCEED ITEMS.	B130	0.40	140.00
08/12/24	DNR	CORRESPONDENCE TO AHUJA & CONSULTANTS REGARDING IRS MAIL RECEIVED.	B240	0.10	35.00
08/12/24	DNR	RECEIVE AND PROCESS RECEIVER'S MAIL.	B210	0.50	175.00
08/13/24	TED	ADDRESS INVESTOR INQUIRIES	B110	2.90	743.85
08/13/24	AMDO	REVIEW AND RESPOND TO INVESTOR INQUIRIES.	B110	1.50	495.00
08/13/24	DNR	CORRESPONDENCE WITH AHUJA & CONSULTANTS REGARDING IRS MAIL.	B240	0.20	70.00
08/13/24	DNR	REVIEW AND PROCESS RECEIVER'S MAIL.	B210	0.30	105.00
08/13/24	DNR	CORRESPONDENCE FROM AHUJA & CONSULTANTS REGARDING FUTURE TAX OBLIGATIONS.	B240	0.10	35.00
08/14/24	AMDO	REVIEW AND RESPOND TO INVESTOR INQUIRIES.	B110	2.30	759.00
08/15/24	AMDO	REVIEW AND RESPOND TO INVESTOR INQUIRIES.	B110	2.20	726.00
08/16/24	AMDO	REVIEW AND RESPOND TO INVESTOR INQUIRIES.	B110	2.30	759.00
08/19/24	AMDO	REVIEW AND RESPOND TO INVESTOR INQUIRIES.	B110	0.80	264.00
08/19/24	DNR	CALL WITH IA INSURANCE DIVISION COUNSEL REGARDING CASE STATUS.	B110	0.80	280.00
08/19/24	TED	ADDRESS INVESTOR INQUIRIES	B110	4.80	1,231.20



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DEBORAH WILLIAMSON

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DATE	ID	DESCRIPTION	TASK	HOURS	AMOUNT
08/20/24	AMDO	REVIEW AND RESPOND TO INVESTOR INQUIRIES.	B110	2.30	759.00
08/20/24	DNR	CALL WITH IA INSURANCE DIVISION ENFORCEMENT COUNSEL REGARDING DISTRIBUTION PLAN AND ITEMS ON SAME.	B110	0.20	70.00
08/20/24	DNR	REVIEW AND PROCESS RECEIVER'S MAIL.	B210	0.90	315.00
08/20/24	DNR	ADDRESS OPEN W-9 ISSUES WITH DEBORAH D. WILLIAMSON.	B110	0.30	105.00
08/20/24	DNR	RECEIVE W-9 AND ADDITIONAL DOCUMENTS FROM CLASS 5 CLAIMANT; REVIEW AND PROCESS; CORRESPONDENCE WITH STRETTO ON SAME AND ADDITION TO DISTRIBUTION REPORT.	B110	0.60	210.00
08/20/24	DNR	CORRESPONDENCE TO AHUJA & CLARK REGARDING IRS MAIL RECEIVED.	B240	0.10	35.00
08/20/24	DNR	CORRESPONDENCE TO OIL AND GAS COUNSEL AND DEBORAH D. WILLIAMSON REGARDING RAILROAD COMMISSION COMPLAINT.	B210	0.10	35.00
08/20/24	TED	ADDRESS INVESTOR INQUIRIES	B110	4.00	1,026.00
08/21/24	AMDO	REVIEW AND RESPOND TO INVESTOR INQUIRIES.	B110	4.90	1,617.00
08/21/24	DNR	CORRESPONDENCE WITH OIL AND GAS COUNSEL REGARDING RAILROAD COMMISSION COMPLAINT AND LANDOWNER CORRESPONDENCE.	B210	0.20	70.00
08/21/24	DNR	ADDRESS W-9 SUBMISSION ISSUES AND INVESTOR CONTACT INFORMATION WITH ALANNA DOMINGUEZ.	B110	1.00	350.00
08/21/24	DNR	CORRESPONDENCE TO IA INSURANCE ENFORCEMENT COUNSEL REGARDING CALL REQUEST ON CASE.	B110	0.10	35.00
08/21/24	TED	ADDRESS INVESTOR INQUIRIES	B110	4.00	1,026.00
08/21/24	DNR	CORRESPONDENCE WITH DEBORAH D. WILLIAMSON REGARDING ENFORCEMENT PROCEEDING HEARING.	B110	0.20	70.00
08/22/24	AMDO	REVIEW AND RESPOND TO INVESTOR INQUIRIES.	B110	0.80	264.00
08/22/24	DNR	REVIEW AND PROCESS RECEIVER'S MAIL.	B210	0.20	70.00
08/22/24	TED	ADDRESS INVESTOR INQUIRIES	B110	4.10	1,051.65
08/23/24	AMDO	REVIEW AND RESPOND TO INVESTOR INQUIRIES.	B110	0.20	66.00
08/23/24	TED	ADDRESS INVESTOR INQUIRIES	B110	1.20	307.80
08/23/24	DNR	CORRESPONDENCE WITH IA ENFORCEMENT COUNSEL REGARDING EVIDENTIARY HEARING.	B110	0.20	70.00
08/23/24	DNR	CORRESPONDENCE WITH SEC COUNSEL REGARDING CASE CALL.	B110	0.20	70.00
08/23/24	DNR	CORRESPONDENCE WITH DEBORAH D. WILLIAMSON AND	B130	0.30	105.00



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DEBORAH WILLIAMSON

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DATE	ID	DESCRIPTION	TASK	HOURS	AMOUNT
		STRETTO REGARDING DISTRIBUTION TIMING UPDATE.			
08/23/24	DNR	TELEPHONE CONFERENCES WITH SEC COUNSEL REGARDING DISTRIBUTION ITEMS.	B110	0.30	105.00
08/26/24	AMDO	REVIEW AND RESPOND TO INVESTOR INQUIRIES.	B110	1.60	528.00
08/26/24	DNR	CALL WITH DEBORAH D. WILLIAMSON REGARDING UPDATE FROM SEC COUNSEL.	B110	0.70	245.00
08/26/24	TED	ADDRESS INVESTOR INQUIRIES	B110	3.30	846.45
08/27/24	AMDO	REVIEW AND RESPOND TO INVESTOR INQUIRIES.	B110	1.10	363.00
08/27/24	DNR	RESEARCH INVESTOR SPECIFIC INVESTMENT INQUIRY AND RESPOND ON SAME.	B310	0.50	175.00
08/27/24	TED	ADDRESS INVESTOR INQUIRIES	B110	1.50	384.75
08/28/24	AMDO	REVIEW AND RESPOND TO INVESTOR INQUIRIES.	B110	1.90	627.00
08/28/24	DNR	CALL WITH DEBORAH D. WILLIAMSON AND SEC COUNSEL REGARDING CASE STATUS AND FILING.	B110	0.50	175.00
08/28/24	DNR	CORRESPONDENCE WITH DEBORAH D. WILLIAMSON REGARDING INVESTOR INQUIRY RESPONSE.	B110	0.30	105.00
08/28/24	DNR	REVIEW AND PROCESS RECEIVER'S MAIL.	B210	0.40	140.00
08/29/24	AMDO	REVIEW AND RESPOND TO INVESTOR INQUIRIES.	B110	1.10	363.00
08/29/24	DNR	CALL WITH DEBORAH D. WILLIAMSON REGARDING DISTRIBUTION LOGISTICS AND TIMING.	B130	0.40	140.00
08/29/24	DNR	CORRESPONDENCE WITH STRETTO AND DEBORAH D. WILLIAMSON REGARDING DISTRIBUTION FORMS, ADDITIONAL W-9S, AND MATERIALS.	B130	0.70	245.00
08/29/24	DNR	REVIEW AND PROCESS RECEIVER'S MAIL.	B210	0.40	140.00
08/29/24	DNR	REVIEW UPDATE FROM AHUJA & CONSULTANTS REGARDING TAX RETURNS AND DISSOLUTION STRATEGY.	B240	0.40	140.00
08/29/24	TED	ADDRESS INVESTOR INQUIRIES	B110	3.80	974.70
08/30/24	DNR	CALL WITH DEBORAH D. WILLIAMSON AND SEC COUNSEL REGARDING DEFENDANT CORRESPONDENCE.	B110	0.30	105.00
08/30/24	DNR	CORRESPONDENCE WITH DEBORAH D. WILLIAMSON AND SEC COUNSEL REGARDING CALL ON CASE.	B110	0.20	70.00
08/30/24	DNR	REVIEW NOTICE AND MOTION TO VACATE ASSET FREEZE ORDER FILED BY SEC.	B110	0.30	105.00
08/30/24	AMDO	REVIEW AND RESPOND TO INVESTOR INQUIRIES; RECONCILE STRETTO 4A W-9 LIST WITH DYKEMA 4A W-9 DOCUMENTS.	B110	6.40	2,112.00



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DATE	ID	DESCRIPTION	TASK	HOURS	AMOUNT
08/30/24	AMDO	REVIEW AND RESPOND TO INVESTOR INQUIRIES.	B110	0.40	132.00
08/30/24	DNR	CORRESPONDENCE WITH OFFICE OF ATTORNEY GENERAL REGARDING COLLECTION ATTEMPT LETTER FOR LEADING EDGE.	B210	0.30	105.00
08/30/24	DNR	REVISE COVER LETTER FOR DISTRIBUTION CHECKS.	B130	0.10	35.00
08/30/24	DNR	CORRESPONDENCE TO STRETTO REGARDING DISTRIBUTION PACKAGES COVER LETTER.	B130	0.10	35.00
08/30/24	DNR	ADDRESS W-9 SUPPORTING DOCUMENTATION ITEMS FOR BENEFICIARY WITH DEBORAH D. WILLIAMSON.	B110	0.30	105.00
08/30/24	DNR	CORRESPONDENCE WITH STRETTO AND TEAM REGARDING W-9 RECONCILIATION AND OUTSTANDING DISTRIBUTION ITEMS.	B110	0.50	175.00
08/30/24	TED	ADDRESS INVESTOR INQUIRIES	B110	5.00	1,282.50
08/31/24	TED	ADDRESS INVESTOR INQUIRIES	B110	3.10	795.15
TOTAL				123.60	\$36,822.40



DEBORAH D WILLIAMSON
DEBORAH WILLIAMSON

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BILLING SUMMARY					
ID	TIMEKEEPER	TITLE	HOURS	RATE	AMOUNT
DNR	DANIELLE R. BEHREND	PARTICIPATING MEMBER	28.10	350.00	9,835.00
AMDO	ALANNA M. DOMINGUEZ	ASSOCIATE	33.90	330.00	11,187.00
TED	THERESA E. DICK	PARALEGAL	61.60	256.50	15,800.40
TOTAL			123.60		\$36,822.40



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DEBORAH WILLIAMSON

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DISBURSEMENTS

DATE	DESCRIPTION	QUANTITY	RATE	AMOUNT
	PRINTING EXPENSES	121.00	0.10	12.10
	RELATIVITY DATA HOSTING	1.00	3,320.00	3,320.00
	SCANNING	22.00	0.10	2.20
	TOTAL DISBURSEMENTS			3,334.30



DEBORAH D WILLIAMSON
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TASK SUMMARY

TASK	TASK DESCRIPTION	HOURS	AMOUNT
B110	CASE ADMINISTRATION	110.70	32,307.40
B130	ASSET DISPOSITION	4.60	1,610.00
B210	BUSINESS OPERATIONS	5.50	1,925.00
B240	TAX ISSUES	2.00	700.00
B310	CLAIMS ADMINISTRATION & OBJECT	0.80	280.00
TOTAL		123.60	36,822.40

EXPENSE SUMMARY

SCANNING	2.20
PRINTING EXPENSES	12.10
RELATIVITY DATA HOSTING	3,320.00
TOTAL	3,334.30



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

OCTOBER 31, 2024
MATTER #: 122686.000002
INVOICE #: 3619873

FOR PROFESSIONAL SERVICES RENDERED

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

FEES	\$	51,556.25
DISBURSEMENTS		6,692.20
INVOICE TOTAL	\$	58,248.45



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

DATE	ID	DESCRIPTION	TASK	HOURS	AMOUNT
09/01/24	TED	ADDRESS INVESTOR INQUIRIES	B110	2.80	718.20
09/03/24	AMDO	REVIEW AND RESPOND TO INVESTOR INQUIRIES; SEND W-9S TO STRETTO; REVIEW AND PLAN FOR REQUIREMENTS FOR QUARTERLY FEE APPLICATION.	B110	3.20	1,056.00
09/03/24	DNR	ADDRESS OPEN W-9 ISSUES WITH TEAM.	B110	0.40	140.00
09/03/24	DNR	CORRESPONDENCE WITH TEAM REGARDING RESPONSE TO INVESTOR INVESTMENT INQUIRY; RESEARCH SAME TO RESPOND.	B110	0.60	210.00
09/03/24	TED	ADDRESS INVESTOR INQUIRIES	B110	4.00	1,026.00
09/04/24	AMDO	REVIEW AND RESPOND TO INVESTOR INQUIRIES; SUBMIT W-9S TO STRETTO.	B110	2.10	693.00
09/04/24	MGC	ATTENTION TO PAYROLL AND OTHER TAX MATTERS WITH MS. WILLIAMSON; RELATED EMAILS WITH MS. AHUJA.	B240	0.30	194.40
09/04/24	DNR	CORRESPONDENCE WITH DEBORAH D. WILLIAMSON AND SEC COUNSEL REGARDING RECEIVERSHIP PARTY SALE ITEMS.	B110	0.40	140.00
09/04/24	DNR	RESOLVE OPEN DISTRIBUTION DOCUMENTATION ITEMS WITH TEAM AND STRETTO.	B130	0.70	245.00
09/04/24	DNR	CORRESPONDENCE WITH DEBORAH D. WILLIAMSON AND AHUJA & CONSULTANTS REGARDING IRS AND CA FRANCHISE TAX BOARD MAIL RECEIVED.	B240	0.20	70.00
09/04/24	DNR	REVIEW AND PROCESS RECEIVER'S MAIL.	B210	0.50	175.00
09/04/24	DNR	REVIEW UPDATE ON OPEN TAX ITEMS.	B240	0.20	70.00
09/04/24	DNR	CORRESPONDENCE WITH DEBORAH D. WILLIAMSON REGARDING DISTRIBUTION TIMING AND SEC UPDATE.	B130	0.20	70.00
09/04/24	DNR	CORRESPONDENCE WITH STRETTO REGARDING DISTRIBUTION TIMING UPDATE.	B130	0.20	70.00
09/04/24	TED	ADDRESS INVESTOR INQUIRIES	B110	4.80	1,231.20
09/05/24	DNR	ADDRESS OPEN DISTRIBUTION AND RECONCILIATION ITEMS WITH STRETTO AND TEAM.	B130	0.40	140.00
09/05/24	DNR	CORRESPONDENCE WITH AHUJA & CONSULTANTS REGARDING IRS LETTER.	B240	0.20	70.00
09/05/24	DNR	CORRESPONDENCE WITH STRETTO AND TEAM REGARDING	B130	0.30	105.00



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DEBORAH WILLIAMSON

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DATE	ID	DESCRIPTION	TASK	HOURS	AMOUNT
		DISTRIBUTION TIMING AND LOGISTIC ISSUES.			
09/05/24	DNR	CORRESPONDENCE WITH DEBORAH D. WILLIAMSON REGARDING DEPARTMENT OF JUSTICE TAX ISSUES.	B240	0.20	70.00
09/05/24	DNR	REVIEW AND PROCESS RECEIVER'S MAIL.	B210	0.30	105.00
09/05/24	DNR	REVIEW AND COMMENT ON NOTICE OF INTENT TO MAKE DISTRIBUTION.	B130	0.20	70.00
09/05/24	DNR	ADDRESS OPEN W-9 AND INVESTOR INQUIRY RESPONSES WITH DEBORAH D. WILLIAMSON.	B110	0.30	105.00
09/05/24	DNR	RECEIVE AND REVIEW WAB STATEMENTS FOR AUGUST 2024; SEND TO AHUJA & CONSULTANTS.	B210	0.40	140.00
09/05/24	DNR	RECEIVE AND REVIEW IBC BANK STATEMENT FOR AUGUST 2024; SEND TO AHUJA & CONSULTANTS.	B210	0.30	105.00
09/05/24	DNR	RECEIVE AND REVIEW UPDATE FROM FARMEE.	B210	0.30	105.00
09/05/24	DNR	PROVIDE FARMOUT UPDATE TO SEC COUNSEL.	B110	0.10	35.00
09/05/24	DNR	CORRESPONDENCE TO OIL AND GAS COUNSEL REGARDING FARMOUT UPDATE.	B210	0.10	35.00
09/05/24	DNR	UPDATE WEBSITE WITH DISTRIBUTION INFORMATION.	B110	0.40	140.00
09/05/24	AMDO	REVIEW AND RESPOND TO INVESTOR INQUIRIES; SEND W-9S TO STRETTO.	B110	2.70	891.00
09/05/24	TED	ADDRESS INVESTOR INQUIRIES	B110	5.50	1,410.75
09/06/24	AMDO	REVIEW AND RESPOND TO INVESTOR INQUIRIES; SEND W-9S TO STRETTO.	B110	1.10	363.00
09/06/24	TED	ADDRESS INVESTOR INQUIRIES	B110	0.90	230.85
09/08/24	AMDO	REVIEW AND RESPOND TO INVESTOR INQUIRIES; SEND W-9S TO STRETTO.	B110	0.80	264.00
09/09/24	AMDO	REVIEW AND RESPOND TO INVESTOR INQUIRIES; SEND W-9S TO STRETTO.	B110	5.20	1,716.00
09/09/24	DNR	CORRESPONDENCE WITH DEBORAH D. WILLIAMSON AND SEC COUNSEL REGARDING ASSET FREEZE TRANSCRIPT.	B110	0.20	70.00
09/09/24	DNR	REVISE DISTRIBUTION COVER LETTER.	B130	0.20	70.00
09/09/24	DNR	CORRESPONDENCE WITH DEBORAH D. WILLIAMSON AND STRETTO REGARDING REVISED COVER LETTER AND DISTRIBUTION PACKAGES.	B130	0.20	70.00
09/09/24	DNR	CORRESPONDENCE TO IA ENFORCEMENT COUNSEL REGARDING DISTRIBUTION PACKAGES.	B110	0.10	35.00



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DEBORAH WILLIAMSON

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DATE	ID	DESCRIPTION	TASK	HOURS	AMOUNT
09/09/24	TED	ADDRESS INVESTOR INQUIRIES	B110	5.80	1,487.70
09/10/24	AMDO	REVIEW AND RESPOND TO INVESTOR INQUIRIES; SEND W-9S TO STRETTO.	B110	4.30	1,419.00
09/10/24	DNR	REVIEW AND PROCESS RECEIVER'S MAIL.	B210	0.30	105.00
09/10/24	DNR	CORRESPONDENCE WITH DEBORAH D. WILLIAMSON AND STRETTO REGARDING DISTRIBUTION PAPERWORK AND OUTSTANDING ITEMS.	B130	0.50	175.00
09/10/24	DNR	ADDRESS TRUSTEE DOCUMENTATION AND W-9 ISSUES FOR VARIOUS INVESTORS.	B110	0.70	245.00
09/10/24	DNR	CORRESPONDENCE FROM IA ENFORCEMENT COUNSEL REGARDING EVIDENTIARY HEARING STATUS.	B110	0.10	35.00
09/10/24	DNR	CORRESPONDENCE WITH NON-INVESTOR CREDITOR REGARDING DISTRIBUTION.	B110	0.20	70.00
09/10/24	TED	ADDRESS INVESTOR INQUIRIES	B110	8.60	2,205.90
09/11/24	AMDO	REVIEW AND RESPOND TO INVESTOR INQUIRIES; SEND W-9S TO STRETTO.	B110	1.60	528.00
09/11/24	DNR	CORRESPONDENCE WITH DEBORAH D. WILLIAMSON AND STRETTO REGARDING DISTRIBUTION.	B130	0.20	70.00
09/11/24	TED	ADDRESS INVESTOR INQUIRIES.	B110	6.60	1,692.90
09/12/24	AMDO	REVIEW AND RESPOND TO INVESTOR INQUIRIES; SEND W-9S TO STRETTO.	B110	1.20	396.00
09/12/24	MGC	MEETING WITH MS. WILLIAMSON, MS. AHUJA AND MS. HUSER REGARDING INCOME AND PAYROLL TAX MATTERS; ADVICE REGARDING SAME; MEMO TO FILE REGARDING SAME.	B240	1.60	1,036.80
09/12/24	DNR	RECEIVE AND REVIEW REQUEST FOR INFORMATION FROM IA ENFORCEMENT COUNSEL.	B110	0.40	140.00
09/12/24	DNR	CORRESPONDENCE WITH DEBORAH D. WILLIAMSON REGARDING REQUEST FOR INFORMATION OF IA ENFORCEMENT COUNSEL.	B110	0.10	35.00
09/12/24	DNR	CORRESPONDENCE WITH DEBORAH D. WILLIAMSON AND STRETTO REGARDING DISTRIBUTION PACKAGES.	B130	0.20	70.00
09/12/24	DNR	REVIEW AND PROCESS RECEIVER'S MAIL.	B210	0.30	105.00
09/12/24	DNR	ADDRESS BENEFICIARY DOCUMENTATION AND DISTRIBUTION ISSUES.	B130	0.40	140.00
09/12/24	TED	ADDRESS INVESTOR INQUIRIES	B110	3.10	795.15
09/13/24	AMDO	REVIEW AND RESPOND TO CLIENT INQUIRIES; SEND W-9S TO	B110	1.40	462.00



DEBORAH D WILLIAMSON
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DATE	ID	DESCRIPTION	TASK	HOURS	AMOUNT
		STRETTO.			
09/13/24	DNR	CORRESPONDENCE WITH DEBORAH D. WILLIAMSON AND STRETTO REGARDING INVESTMENT PAPERWORK AND UPDATES FOR CERTAIN INVESTOR.	B130	0.30	105.00
09/13/24	DNR	ADDRESS OPEN INVESTOR ISSUES REGARDING DISTRIBUTION AND PAPERWORK SUPPORTING SAME.	B130	0.40	140.00
09/13/24	DNR	CORRESPONDENCE WITH IA ENFORCEMENT COUNSEL REGARDING REQUESTED INFORMATION.	B110	0.20	70.00
09/13/24	DNR	RECEIVE AND REVIEW LEDGER REPORTS FROM STRETTO.	B130	0.40	140.00
09/13/24	DNR	RECEIVE AND REVIEW IBC ANALYSIS STATEMENT; SEND TO AHUJA & CONSULTANTS.	B210	0.30	105.00
09/13/24	TED	ADDRESS INVESTOR INQUIRIES	B110	3.10	795.15
09/15/24	DNR	REVIEW AND RESPOND TO INVESTOR INQUIRIES.	B110	0.40	140.00
09/16/24	AMDO	REVIEW AND RESPOND TO INVESTOR INQUIRES; SEND W-9S TO STRETTO.	B110	2.70	891.00
09/16/24	DNR	REVIEW AND PROCESS RECEIVER'S MAIL.	B210	0.60	210.00
09/16/24	TED	ADDRESS INVESTOR INQUIRIES.	B110	7.20	1,846.80
09/17/24	AMDO	REVIEW AND RESPOND TO INVESTOR INQUIRIES; SEND W-9S TO STRETTO.	B110	1.30	429.00
09/17/24	DNR	REVIEW AND RESPOND TO INVESTOR INQUIRIES.	B110	0.60	210.00
09/17/24	TED	ADDRESS INVESTOR INQUIRIES.	B110	3.60	923.40
09/18/24	AMDO	REVIEW AND RESPOND TO INVESTOR INQUIRIES; SEND W-9S TO STRETTO.	B110	0.70	231.00
09/18/24	TED	ADDRESS INVESTOR INQUIRIES.	B110	3.80	974.70
09/19/24	AMDO	REVIEW AND RESPOND TO INVESTOR INQUIRIES; SEND W-9S TO STRETTO; CONFER WITH CLIENT REGARDING NEXT ITERATION OF DISTRIBUTIONS.	B110	2.50	825.00
09/19/24	DNR	REVIEW AND RESPOND TO INVESTOR INQUIRIES.	B110	0.80	280.00
09/19/24	DNR	ADDRESS DISTRIBUTION ISSUES OF INVESTOR WITH STRETTO AND DEBORAH D. WILLIAMSON.	B130	0.60	210.00
09/19/24	TED	ADDRESS INVESTOR INQUIRIES	B110	3.00	769.50
09/20/24	TED	ADDRESS INVESTOR INQUIRIES.	B110	2.50	641.25
09/20/24	DNR	CORRESPONDENCE WITH STRETTO REGARDING DISTRIBUTION INQUIRIES OF INVESTORS.	B130	0.40	140.00



DEBORAH D WILLIAMSON
DEBORAH WILLIAMSON

MATTER #: 122686.000002
INVOICE #: 3619873
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OCTOBER 31, 2024

DATE	ID	DESCRIPTION	TASK	HOURS	AMOUNT
09/20/24	DNR	ADDRESS DISTRIBUTION INQUIRIES OF INVESTORS AND PREPARE RESPONSES.	B110	0.60	210.00
09/20/24	DNR	REVIEW ORDER LIFTING ASSET FREEZE.	B110	0.10	35.00
09/22/24	AMDO	REVIEW AND RESPOND TO INVESTOR INQUIRIES; COMMUNICATE WITH CLIENT REGARDING PROPOSED SECOND ITERATION OF DISTRIBUTION.	B110	0.70	231.00
09/23/24	AMDO	REVIEW AND RESPOND TO INVESTOR INQUIRIES; SEND W-9S TO STRETTO.	B110	3.10	1,023.00
09/23/24	DNR	REVIEW AND PROCESS RECEIVER'S MAIL.	B210	1.00	350.00
09/23/24	DNR	CORRESPONDENCE WITH YOUNG CAD COUNSEL REGARDING PROPERTY TAX COLLECTION LETTERS.	B240	0.40	140.00
09/23/24	DNR	COORDINATE AND ADDRESS SECOND BATCH OF DISTRIBUTION CHECKS AND LOGISTICS ON SAME.	B130	0.40	140.00
09/23/24	DNR	REVIEW AND RESPOND TO INVESTOR INQUIRIES.	B110	0.40	140.00
09/23/24	DNR	CORRESPONDENCE TO DEBORAH D. WILLIAMSON AND AHUJA & CONSULTANTS REGARDING IRS MAIL RECEIVED.	B240	0.10	35.00
09/23/24	DNR	REVIEW SETTLEMENT MOTION REGARDING PEARSEY, MURATORE, AND MURATORE FINANCIAL SERVICES; CORRESPONDENCE WITH DEBORAH D. WILLIAMSON REGARDING SAME.	B110	0.70	245.00
09/23/24	TED	ADDRESS INVESTOR INQUIRIES.	B110	3.40	872.10
09/24/24	AMDO	REVIEW AND RESPOND TO INVESTOR INQUIRIES; SEND W-9S TO STRETTO.	B110	1.40	462.00
09/24/24	DNR	CORRESPONDENCE WITH IA ENFORCEMENT COUNSEL REGARDING EVIDENTIARY HEARING AND SUBPOENA.	B110	0.20	70.00
09/24/24	DNR	UPDATE WEBSITE CONTENT.	B110	0.40	140.00
09/24/24	DNR	PROVIDE INFORMATION TO RECEIVER REGARDING TAX-FILING OBLIGATIONS.	B240	0.30	105.00
09/24/24	DNR	REVIEW AND RESPOND TO INVESTOR INQUIRIES.	B110	0.40	140.00
09/24/24	DNR	REQUEST INFORMATION FROM STRETTO REGARDING CERTAIN INVESTORS FOR DISTRIBUTION PURPOSES.	B130	0.30	105.00
09/24/24	DNR	REVIEW STOP PAYMENT NOTICES AND EMAILS WITH RECEIVER REGARDING SAME.	B210	0.30	105.00
09/24/24	DNR	CORRESPONDENCE WITH STRETTO AND WAB REGARDING BANK ACCOUNT NOTICES.	B210	0.30	105.00
09/24/24	TED	ADDRESS INVESTOR INQUIRIES	B110	4.00	1,026.00



DEBORAH D WILLIAMSON
DEBORAH WILLIAMSON

MATTER #: 122686.000002
INVOICE #: 3619873
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OCTOBER 31, 2024

DATE	ID	DESCRIPTION	TASK	HOURS	AMOUNT
09/24/24	DADO	CASE MANAGEMENT CONFERENCE WITH D. BEHREND'S REGARDING ACTION ITEMS, UPCOMING DEADLINES, CLIENT PREFERENCES, AND UPCOMING QUARTERLY REPORTING.	B110	0.60	198.00
09/25/24	DNR	CORRESPONDENCE WITH IA ENFORCEMENT COUNSEL REGARDING EVIDENTIARY HEARING AND SUBPOENA.	B110	0.20	70.00
09/25/24	DNR	REVIEW AND PROCESS RECEIVER'S MAIL.	B210	0.30	105.00
09/25/24	AMDO	REVIEW AND RESPOND TO INVESTOR INQUIRIES; SEND W-9S TO STRETTO.	B110	1.40	462.00
09/25/24	TED	ADDRESS INVESTOR INQUIRIES	B110	1.50	384.75
09/25/24	DADO	REVIEWED EMAILS BETWEEN D. WILLIAMSON, A.DOMINGUEZ, AND D. BEHREND'S FOR EARLY SEPTEMBER W9 STATUS.	B310	0.20	66.00
09/25/24	DADO	REVIEWED AND ANNOTATED SEC'S RECENT SETTLEMENT FILINGS.	B110	0.50	165.00
09/25/24	DADO	READ ELEVENTH QUARTERLY REPORT TO NOTATE ACTION ITEMS WE NEED TO FOLLOW UP ON TO DRAFT THE TWELFTH QUARTERLY REPORT.	B110	0.80	264.00
09/26/24	AMDO	REVIEW AND RESPOND TO INVESTOR INQUIRIES; SEND W-9S TO STRETTO.	B110	1.80	594.00
09/26/24	DNR	UPDATE WEBSITE CONTENT.	B110	0.40	140.00
09/26/24	TED	ADDRESS INVESTOR INQUIRIES.	B110	2.70	692.55
09/26/24	DADO	MEETING WITH A. DOMINGUEZ AND T. DICK: W9 STATUS AND DRAFTING OF QUARTERLY REPORT.	B310	1.10	363.00
09/26/24	DADO	CORRESPONDENCE WITH D. BEHREND'S REGARDING QUARTERLY REPORTS AND FEE APPLICATIONS.	B110	0.50	165.00
09/26/24	DADO	REVIEW AND RESPOND TO INVESTOR INQUIRIES.	B310	1.80	594.00
09/26/24	DADO	REVIEW DRAFT OF TWELFTH QUARTERLY REPORT.	B110	0.50	165.00
09/27/24	AMDO	REVIEW AND RESPOND TO INVESTOR INQUIRIES; SEND W-9S TO STRETTO.	B110	1.60	528.00
09/27/24	TED	ADDRESS INVESTOR INQUIRIES	B110	4.80	1,231.20
09/27/24	DNR	REVIEW TEXAS RAILROAD COMMISSION NOTICES.	B210	0.50	175.00
09/27/24	DADO	CORRESPONDENCE WITH D. BEHREND'S REGARDING CALL WITH A. BOOTH AND W9 REVIEW PROCESS.	B110	0.60	198.00
09/27/24	DNR	REVIEW UPDATE FROM AHUJA & CONSULTANTS REGARDING IRS NOTICES.	B240	0.20	70.00
09/27/24	DADO	REVIEW CORRESPONDENCE WITH W9 CLAIMANTS AND	B310	2.80	924.00



DEBORAH D WILLIAMSON
DEBORAH WILLIAMSON

MATTER #: 122686.000002
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OCTOBER 31, 2024

DATE	ID	DESCRIPTION	TASK	HOURS	AMOUNT
		RESPOND TO SAME.			
09/30/24	AMDO	REVIEW AND RESPOND TO INVESTOR INQUIRIES; SEND W-9S TO STRETTO.	B110	2.70	891.00
09/30/24	DNR	REVIEW AND RESPOND TO INVESTOR INQUIRIES.	B110	0.60	210.00
09/30/24	DNR	ANALYZE DOCUMENTATION FOR DISTRIBUTION INQUIRY OF INVESTOR AND PROVIDE RESULT OF SAME.	B130	0.30	105.00
09/30/24	DADO	DRAFTING OF THE 2024 THIRD QUARTERLY REPORT.	B110	1.50	495.00
09/30/24	DADO	REVIEW CORRESPONDENCE WITH W9 CLAIMANTS AND RESPOND TO SAME.	B310	2.50	825.00
09/30/24	TED	ADDRESS INVESTOR INQUIRIES	B110	8.00	2,052.00
		TOTAL		172.90	\$51,556.25



DEBORAH D WILLIAMSON
DEBORAH WILLIAMSON

MATTER #: 122686.000002
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OCTOBER 31, 2024

BILLING SUMMARY

ID	TIMEKEEPER	TITLE	HOURS	RATE	AMOUNT
MGC	MICHAEL G. CUMMING	MEMBER	1.90	648.00	1,231.20
DNR	DANIELLE R. BEHREND	PARTICIPATING MEMBER	24.40	350.00	8,540.00
AMDO	ALANNA M. DOMINGUEZ	ASSOCIATE	43.50	330.00	14,355.00
DADO	DOMINIQUE A. DOUGLAS	ASSOCIATE	13.40	330.00	4,422.00
TED	THERESA E. DICK	PARALEGAL	89.70	256.50	23,008.05
TOTAL			172.90		\$51,556.25



DEBORAH D WILLIAMSON
DEBORAH WILLIAMSON

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OCTOBER 31, 2024

DISBURSEMENTS

DATE	DESCRIPTION	QUANTITY	RATE	AMOUNT
	PRINTING EXPENSES	448.00	0.10	44.80
	RELATIVITY DATA HOSTING	2.00	3,320.00	6,640.00
	SCANNING	74.00	0.10	7.40
	TOTAL DISBURSEMENTS			6,692.20



DEBORAH D WILLIAMSON
DEBORAH WILLIAMSON

MATTER #: 122686.000002
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OCTOBER 31, 2024

TASK SUMMARY

TASK	TASK DESCRIPTION	HOURS	AMOUNT
B110	CASE ADMINISTRATION	148.20	42,513.05
B130	ASSET DISPOSITION	6.80	2,380.00
B210	BUSINESS OPERATIONS	5.80	2,030.00
B240	TAX ISSUES	3.70	1,861.20
B310	CLAIMS ADMINISTRATION & OBJECT	8.40	2,772.00
TOTAL		172.90	51,556.25

EXPENSE SUMMARY

SCANNING	7.40
PRINTING EXPENSES	44.80
RELATIVITY DATA HOSTING	6,640.00
TOTAL	6,692.20

EXHIBIT E-2

Law Offices of Romero | Kozub
8553 N. Beach Street, PMB 230
Fort Worth, Texas 76244
682-267-1351

Law Offices of Romero | Kozub

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

Balance \$382.50
Invoice # 00177
Invoice Date October 21, 2024
Payment Terms
Due Date

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

Time Entries

Date	EE	Activity	Description	Rate	Hours	Line Total
07/24/2024	RR	Case Administration	Email with D. Behrends regarding hearing on August 15	\$425.00	0.1	\$42.50
07/30/2024	RR	Case Administration	Email with D. Behrends regarding W-9 submission and investor inquiries	\$425.00	0.2	\$85.00
08/15/2024	RR	Case Administration	Telephone call with D. Williamson regarding hearing on August 18	\$425.00	0.3	\$127.50
08/16/2024	RR	Case Administration	Attend telephone conference hearing	\$425.00	0.3	\$127.50

Totals: 0.9 \$382.50

Time Entry Sub-Total:	\$382.50
Sub-Total:	\$382.50
Total:	\$382.50
Amount Paid:	\$0.00
Balance Due:	\$382.50

EXHIBIT E-3

Law Practice of Darrell R. Jones, PLLC

drj@oilesquire.com

(832) 302-5373

August 06, 2024

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

Invoice Number: 1003

Invoice Period: 07-01-2024 - 07-31-2024

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
07-01-2024	Eric Hillerman	C300 - Analysis and Advice Work regarding TRRC notice of injection well. Work regarding farmout report and TRRC enforcement notices.	0.80	325.00	260.00
07-08-2024	Eric Hillerman	C300 - Analysis and Advice Work regarding TRRC Site Remediation notice and docs for TX AG.	0.30	325.00	97.50
07-09-2024	Eric Hillerman	C300 - Analysis and Advice Work regarding doc prod and insurance issues.	0.20	325.00	65.00
07-11-2024	Eric Hillerman	C300 - Analysis and Advice Work regarding insurance and Gulf Coast issues.	0.30	325.00	97.50
07-15-2024	Eric Hillerman	C300 - Analysis and Advice Work regarding TRRC notices and escheatment close out confirmation.	1.10	325.00	357.50
07-16-2024	Eric Hillerman	C300 - Analysis and Advice Work regarding TRRC, Gulf Coast and well log production.	0.30	325.00	97.50
07-17-2024	Eric Hillerman	C300 - Analysis and Advice Work regarding property record filings in Val Verde and Crockett counties.	0.20	325.00	65.00
07-18-2024	Eric Hillerman	C300 - Analysis and Advice Work regarding Sparks wells abandonment issues.	0.30	325.00	97.50
07-22-2024	Eric Hillerman	C300 - Analysis and Advice Work regarding abandoned well list; work regarding insurance and work regarding TRRC letter regarding Leading Edge.	0.70	325.00	227.50
07-23-2024	Eric Hillerman	C300 - Analysis and Advice Work regarding Saguaro change of operator filing and response.	0.40	325.00	130.00

Date	Professional	Task	Hours	Rate	Amount
07-29-2024	Eric Hillerman	C300 - Analysis and Advice	1.30	325.00	422.50
Work regarding TRRC letters and notices to Tex AG; document production, and SDMB Gulf Coast Payments. Work regarding injection well notice, TRRC notices and lien release and Farmout Assignments.					
Total					1,917.50

Time Summary

Professional	Hours	Amount
Eric Hillerman	5.90	1,917.50
Total		1,917.50
Total for this Invoice		1,917.50

Client Statement of Account

As of 08-06-2024

Matter	Balance Due
Receiver for Barron Petroleum LLC, Barron Energy Corporation and Affiliated Entities	14,202.50
Total Amount to Pay	14,202.50

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

Transactions				
Date	Transaction	Applied	Invoice	Amount
07-01-2024	Previous Balance			12,285.00
08-06-2024	Invoice 1003			1,917.50
			Balance	14,202.50

Open Invoices and Credits				
Date	Transaction	Amount	Applied	Balance
05-03-2024	Invoice 969	5,297.50		5,297.50
06-04-2024	Invoice 984	5,362.50		5,362.50
07-01-2024	Invoice 992	1,625.00		1,625.00
08-06-2024	Invoice 1003	1,917.50		1,917.50
			Balance	14,202.50

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

August 06, 2024

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

Invoice Number: 1003
Invoice Period: 07-01-2024 - 07-31-2024

REMITTANCE COPY

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

Fees	1,917.50
Total for this Invoice	1,917.50
Previous Balance	12,285.00

Matter	Balance Due
Receiver for Barron Petroleum LLC, Barron Energy Corporation and Affiliated Entities	14,202.50
Total Amount to Pay	14,202.50

Open Invoices and Credits					
Date	Transaction	Matter	Amount	Applied	Balance
05-03-2024	Invoice 969	Receiver for Barron Petroleum LLC, Barron Energy Corporation and Affiliated Entities	5,297.50		5,297.50
06-04-2024	Invoice 984	Receiver for Barron Petroleum LLC, Barron Energy Corporation and Affiliated Entities	5,362.50		5,362.50
07-01-2024	Invoice 992	Receiver for Barron Petroleum LLC, Barron Energy Corporation and Affiliated Entities	1,625.00		1,625.00
08-06-2024	Invoice 1003	Receiver for Barron Petroleum LLC, Barron Energy Corporation and Affiliated Entities	1,917.50		1,917.50
				Balance	14,202.50

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

September 02, 2024

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

Invoice Number: 1010

Invoice Period: 08-01-2024 - 08-31-2024

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
08-02-2024	Eric Hillerman	C300 - Analysis and Advice Work regarding SDMB report on farmout operations.	0.30	325.00	97.50
08-06-2024	Eric Hillerman	C300 - Analysis and Advice Work regarding TRRC complaint and TRRC Memorandums.	0.70	325.00	227.50
08-21-2024	Eric Hillerman	C300 - Analysis and Advice Work regarding Greg Brown, surface owner, regarding operations by him on abandoned leasehold. Work regarding TRRC notice.	0.40	325.00	130.00
08-30-2024	Eric Hillerman	C300 - Analysis and Advice Work regarding TRRC notices.	0.30	325.00	97.50
Total					552.50

Time Summary

Professional	Hours	Amount
Eric Hillerman	1.70	552.50
Total		552.50

Total for this Invoice 552.50

Client Statement of Account

As of 09-02-2024

Matter	Balance Due
Receiver for Barron Petroleum LLC, Barron Energy Corporation and Affiliated Entities	2,470.00
Total Amount to Pay	2,470.00

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

Transactions				
Date	Transaction	Applied	Invoice	Amount
08-06-2024	Previous Balance			14,202.50
08-22-2024	Payment Received - Reference 1337			(12,285.00)
08-22-2024	Payment Applied	5,297.50	969	
08-22-2024	Payment Applied	5,362.50	984	
08-22-2024	Payment Applied	1,625.00	992	
09-02-2024	Invoice 1010			552.50
			Balance	2,470.00

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
			Balance	2,470.00

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

September 02, 2024

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

Invoice Number: 1010
Invoice Period: 08-01-2024 - 08-31-2024

REMITTANCE COPY

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

Fees	552.50
Total for this Invoice	552.50
Previous Balance	1,917.50

Matter	Balance Due
Receiver for Barron Petroleum LLC, Barron Energy Corporation and Affiliated Entities	2,470.00
Total Amount to Pay	2,470.00

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
				Balance	2,470.00

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

October 04, 2024

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

Invoice Number: 1022
Invoice Period: 09-01-2024 - 09-30-2024

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
09-03-2024	Eric Hillerman	C300 - Analysis and Advice Work regarding SDMB report and operations status.	0.40	325.00	130.00
09-05-2024	Eric Hillerman	C300 - Analysis and Advice Work regarding Greg Brown/Lasalle Cattle surface issues and plugging agreement.	0.30	325.00	97.50
			Total		227.50

Time Summary

Professional	Hours	Amount
Eric Hillerman	0.70	227.50
Total		227.50

Total for this Invoice 227.50

Client Statement of Account

As of 10-04-2024

Matter	Balance Due
Receiver for Barron Petroleum LLC, Barron Energy Corporation and Affiliated Entities	2,697.50
Total Amount to Pay	2,697.50

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

Transactions				
Date	Transaction	Applied	Invoice	Amount
09-02-2024	Previous Balance			2,470.00
10-04-2024	Invoice 1022			227.50
			Balance	2,697.50

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
			Balance	2,697.50

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

October 04, 2024

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

Invoice Number: 1022
Invoice Period: 09-01-2024 - 09-30-2024

REMITTANCE COPY

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

Fees	227.50
Total for this Invoice	227.50
Previous Balance	2,470.00

Matter	Balance Due
Receiver for Barron Petroleum LLC, Barron Energy Corporation and Affiliated Entities	2,697.50
Total Amount to Pay	2,697.50

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
				Balance	2,697.50

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

EXHIBIT E-4

Vicki Palmour Consulting, LLC

PO Box 1925
Graham Texas 76450

Date	Invoice #
7/31/2024	20833

Bill To
Heartland Receivership Deborah Williamson, Receiver Dykema Law Firm 112 E. Pecan Street, Suite 1800 San Antonio, Texas 78205

Terms
Due on receipt

Quantity	Description	Rate	Amount
	ACCOUNTING WORK		
2	BT210 - AA - 7/3/24 Work on WolfePak Payroll (Barron)	100.00	200.00
3.5	BT210 - AA - 7/10/24 Work on WolfePak Payroll (Barron)	100.00	350.00
3	BT210 - AA - 7/23/24 Work on WolfePak Payroll (Arco Oil)	100.00	300.00
	Sales Tax	6.75%	0.00
		Total	\$850.00

VICKI PALMOUR CONSULTING LLC
QUARTERLY ACCOUNTING
(JULY, AUGUST, SEPTEMBER 2024)
INVOICE # 20833

		HOURS	TOTAL BILLED
BT210	VICKI PALMOUR	0	\$ -
BT210	TAMMY JOBE	0	\$ -
BT210	JENNIFER RIGGINS	0	\$ -
BT210	TYNA GOBER	0	\$ -
BT210	AMY AMBURN	0	\$ -
	TOTAL REGULATORY	0	\$ -
BT120	AMY AMBURN	8.5	\$ 850.00
BT120	TAMMY JOBE	0	\$ -
BT120	VICKI PALMOUR	0	\$ -
BT120	JENNIFER RIGGINS	0	\$ -
	TOTAL ACCOUNTING	8.5	\$ 850.00
	REIMBURSED EXPENSES		\$ -
	TOTAL		\$ 850.00

VICKI PALMOUR CONSULTING, LLC
THIRD QUARTER 2024

ACCOUNTING WORK – Barron Petroleum, ArcoOil

1. Continued and finished work on WolfePak payroll for Barron Petroleum and ArcoOil

EXHIBIT E-5



Ahuja & Consultants, Inc.
Certified Public Accountants

Ahuja & Consultants, Inc.

2901 N. Dallas Pkwy
Suite 320
Plano, TX 75093

Invoice # 8233.HL
Invoice Date: 09/30/2024
Due Date: 10/31/2024

Bill To:
Dykema
Attn: Deborah Williamson

Q3 2024 BILLING SUMMARY

TASK	TASK DESCRIPTION	HOURS	AMOUNT
2900	Accounting/Auditing	53.70	\$10,627.00
3900	Tax Issues	52.00	\$13,608.00
4900	Forensic Accounting	83.90	\$20,979.50

TOTAL **\$45,214.50**



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Due Date: 10/31/2024

Bill To:
Dykema
Attn: Deborah Williamson

Q3 2024 BILLING SUMMARY

ID	TIMEKEEPER	TITLE	HOURS	RATE	AMOUNT
AH	Ammon Hall	Associate	6.80	\$120.00	\$816.00
AK	Arti Kathiriya	Sr. Associate	1.60	\$180.00	\$288.00
CB	Carolyn Bremer	Engagement Leader	41.10	\$325.00	\$13,357.50
DS	Divya Shetty	Manager	38.30	\$250.00	\$9,575.00
JB	Jeanne-Marie Blevins	Associate	7.30	\$120.00	\$876.00
JW	Jennifer Wallace	Associate	19.10	\$120.00	\$2,292.00
MA	Madhu Ahuja	Engagement Leader	12.60	\$325.00	\$4,095.00
NTH	Natasha Toeteberg – Harms	Sr. Associate	25.50	\$180.00	\$4,590.00
SH	Stacey Huser	Manager	37.30	\$250.00	\$9,325.00

TOTAL 189.60 \$45,214.50



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Plano, TX 75093

Invoice # 8233.HL
Invoice Date: 09/30/2024
Due Date: 10/31/2024

Bill To:
Dykema
Attn: Deborah Williamson

Date	ID	Description	Task	Hours	Amount
07/01/24	CB	Analyzing and researching investments owned by advisors per request of Receiver.	4900	5.60	\$1,820.00
07/02/24	CB	Analyzing and summarizing report of advisors with investments as requested by Receiver.	4900	1.70	\$552.50
07/02/24	JW	Accounting related to reconciliation of IBC May 2024 account	2900	2.40	\$288.00
07/02/24	SH	Respond to client request regarding documentation for the IRS/DOJ package	2900	1.50	\$375.00
07/02/24	SH	Review and summarize distributions related to advisors	4900	1.00	\$250.00
07/08/24	JW	Accounting related to reconciliation of IBC May 2024 production account	2900	0.40	\$48.00
07/09/24	JW	Accounting related to reconciliation of IBC and Western Alliance Bank accounts.	2900	3.10	\$372.00
07/09/24	CB	Recalculation of investor distribution amounts based on adjusted Court approved claim for one investor.	4900	0.40	\$130.00
07/09/24	JB	Begin preparation of 2024 Q2 Standard Fund Accounting Report (SFAR)	2900	1.80	\$216.00
07/09/24	DS	Listing the signed POA's in A&C files	3900	0.80	\$200.00
07/09/24	SH	Review Q2 2024 accounting	2900	1.50	\$375.00
07/09/24	MA	Review of POA's for payroll and income tax. Correspondence with Ms. Behrends	3900	1.00	\$325.00
07/09/24	DS	Prepare POA's for all entities	3900	2.70	\$675.00
07/10/24	CB	Revising declaration related to Bahamas tracing related to most recent visuals	4900	1.90	\$617.50
07/10/24	SH	Review Q2 draft receipts and disbursements report	2900	1.00	\$250.00
07/10/24	JB	Continue preparation of 2024 Q2 SFAR	2900	4.90	\$588.00
07/11/24	MA	Communication with Ms. Behrends, Ms. Williamson, Ms. Huser, Ms. Bremer, and Ms. Shetty regarding updates and status	3900	0.30	\$97.50
07/11/24	MA	Review and draft questions regarding POA's	3900	0.50	\$162.50
07/11/24	DS	Reviewing the POA's by Madhu (listing additional questions to be asked to Receiver)	3900	1.00	\$250.00
07/11/24	CB	Updating declaration on Bahamas funds tracing along with visuals and sent to Receiver	4900	2.30	\$747.50
07/11/24	SH	Communication with Ms. Williamson, Ms. Behrends, Ms. Ahuja, Ms. Bremer, and Ms. Shetty regarding tax, accounting, and forensic items	2900	0.30	\$75.00

Date	ID	Description	Task	Hours	Amount
07/11/24	DS	Communication with Ms. Behrends, Ms. Williamson, Ms. Huser, Ms. Ahuja, and Ms. Bremer regarding updates and status.	3900	0.30	\$75.00
07/11/24	CB	Communication with Ms. Behrends, Ms. Williamson, Ms. Huser, Ms. Ahuja, and Ms. Shetty regarding updates and status.	4900	0.30	\$97.50
07/12/24	DS	Preparing the POA's for all entities	3900	2.50	\$625.00
07/17/24	DS	Continue working on POA's for all entities	3900	2.80	\$700.00
07/17/24	CB	Drafted distribution payments summary for website as requested by Receiver.	4900	0.40	\$130.00
07/22/24	CB	Initial review and communication to Receiver of new bank account information related to transfers to Dallas Resources account.	4900	0.70	\$227.50
07/22/24	NTH	Reviewing account transactions for additional bank account received for a Sahota entity in relation to the Bahamas funds tracing. Preparing summary for Receiver.	4900	3.50	\$630.00
07/23/24	CB	Communication with Ms. Williamson and Ms. Behrends regarding activity in new bank account information received.	4900	0.30	\$97.50
07/23/24	CB	Review of new bank statement activity to identify source of funds into account.	4900	1.10	\$357.50
07/23/24	CB	Review and edit draft of website language regarding distributions as requested by Receiver	4900	0.40	\$130.00
07/24/24	CB	Review of Sahota entity account activity to identify certain check disbursements.	4900	1.90	\$617.50
07/29/24	DS	Analysis of payroll taxes upon receipt of additional documents for ArcoOil	2900	0.50	\$125.00
07/30/24	SH	Review documentation provided related to reports from WolfePak	2900	2.00	\$500.00
08/05/24	CB	Analyzing and responding to request from Receiver for interest amounts on TIEP rollovers.	4900	0.80	\$260.00
08/05/24	DS	Call to IRS for transcripts	3900	0.50	\$125.00
08/06/24	CB	Communication with Ms. Williamson, Ms. Ahuja, and Ms. Huser regarding updates.	4900	0.50	\$162.50
08/06/24	MA	Communication with Ms. Williamson, Ms. Bremer, and Ms. Huser regarding updates.	3900	0.50	\$162.50
08/06/24	MA	Review of email communications and documenting updated tasks for tax team	3900	0.50	\$162.50
08/06/24	SH	Communication with Ms. Williamson, Ms. Bremer, and Ms. Ahuja to discuss status of projects and end of year tax planning	2900	0.50	\$125.00
08/07/24	DS	Call with IRS on the transcripts and download the transcripts sent by the IRS from the IRS portal	3900	2.20	\$550.00
08/07/24	SH	Review requested items for Ms. Williamson	2900	0.50	\$125.00
08/08/24	SH	Review responses to State of California notice	2900	0.50	\$125.00
08/08/24	DS	Prepare 2024 balance sheet for all entities, respond to CA notice, call the IRS for transcripts and download the transcripts	3900	4.80	\$1,200.00
08/08/24	NTH	Added additional data points (effective distribution returns on investment) to analysis per Receiver request.	4900	1.00	\$180.00
08/08/24	CB	Analyzing and responding to various questions from Receiver on specific investors or funds received as well as recovery percentages pre and post receivership.	4900	0.90	\$292.50
08/13/24	SH	Review of CA status related to HPAR notice received and response letter (24m); review of draft Balance Sheets for remaining assets and analysis of entities to be closed, summarizing findings (2h 18m)	2900	2.70	\$675.00
08/13/24	MA	Review remaining asset spreadsheet and termination of entity recommendations	3900	1.00	\$325.00
08/15/24	CB	Review of 5th Circuit decision on tracing funds sent by Receiver.	4900	0.40	\$130.00
08/15/24	JW	Accounting for the period July 2024	2900	1.10	\$132.00
08/16/24	DS	Continue to call with IRS for transcripts for all entities	3900	0.50	\$125.00
08/19/24	DS	Download tax transcripts	3900	0.90	\$225.00

Date	ID	Description	Task	Hours	Amount
08/20/24	MA	Communication with Ms. Williamson, Ms. Bremer and Ms. Huser regarding receivership updates and requests.	3900	0.50	\$162.50
08/20/24	SH	Communication with Ms. Williamson, Ms. Ahuja and Ms. Bremer regarding receivership updates and requests.	2900	0.50	\$125.00
08/20/24	DS	Summarize the transcripts received from the IRS for all entities & update the investors closing capital as of 12/31/23	3900	3.50	\$875.00
08/20/24	CB	Communication with Ms. Williamson, Ms. Ahuja and Ms. Huser regarding receivership updates and requests.	4900	0.50	\$162.50
08/20/24	SH	Communication regarding CA notice response requirements (12m), update files and information needed per discussion with Ms. Williamson	2900	0.70	\$175.00
08/27/24	DS	Continue to call with IRS for the transcripts (32 mins) download transcripts and prepare the summary sheet for payroll taxes	3900	4.50	\$1,125.00
08/27/24	MA	Check IRS portal and download transcripts from the IRS	3900	1.00	\$325.00
08/27/24	SH	Review of revised balance sheet activity after detailed information added per Receiver request	2900	0.30	\$75.00
08/28/24	MA	Review of summary for transcripts and the tax owed calculation	3900	0.50	\$162.50
08/28/24	DS	Summarize the payroll account transcripts received for Heartland Entities and meet with Ms. Ahuja & Ms. Huser (30 mins) to summarize results	3900	2.50	\$625.00
08/29/24	SH	Review and analysis of entities for potential closure (42m), begin review and summary of IRS transcript data and calculations (36m)	2900	1.30	\$325.00
08/30/24	NTH	Review of Declaration to incorporate research of accepted tracing methodologies to support findings.	4900	4.00	\$720.00
08/30/24	SH	Review IRS transcript analysis and prepare summary report	2900	2.50	\$625.00
09/03/24	MA	Questions regarding Form 5495 for income tax and payroll taxes	3900	1.00	\$325.00
09/03/24	NTH	Updating visuals of funds tracing for Bahamas real estate purchases to reflect Heartland investor funds flowing to Sahota accounts. Updating declaration on funds tracing for Bahamas real estate purchases to describe tracing approach.	4900	7.00	\$1,260.00
09/03/24	DS	Update all the Form 5495 for dates that the tax return was filed on	3900	1.00	\$250.00
09/03/24	DS	Call with the IRS for the transcript of the amended tax return & follow up on why the 941 account transcripts have different wordings for 941 not filed in prior years	3900	0.80	\$200.00
09/04/24	SH	Communication with Ms. Williamson, Ms. Ahuja, and Ms. Shetty regarding project status	2900	0.50	\$125.00
09/04/24	CB	Began review of updated visuals for Bahamas tracing and declaration.	4900	0.50	\$162.50
09/04/24	MA	Communication with Ms. Williamson, Ms. Huser, and Ms. Shetty regarding project status	3900	0.50	\$162.50
09/04/24	DS	Verify the Payroll amount on the Transcripts to the Bank statement (2 hrs.) Communication with Ms. Williamson, Ms. Ahuja, and Ms. Huser regarding project status (30m)	3900	2.50	\$625.00
09/05/24	CB	Continue review of updated declaration for Bahamas tracing.	4900	0.90	\$292.50
09/06/24	MA	Review examples of case law regarding distribution methodology for Bahamas tracing and discuss with Ms. Bremer	4900	2.00	\$650.00
09/09/24	NTH	Continued edits to Bahamas declaration draft regarding tracing methodologies and A&C's method; creation of example scenarios for each tracing method related to Bahamas property purchases.	4900	6.00	\$1,080.00
09/09/24	CB	Reviewing updated visual of Bahamas fund tracing and notating edits and editing declaration to include discussion on tracing methods.	4900	4.50	\$1,462.50
09/10/24	NTH	Edits to visual representation of funds tracing to determine source of funds for Bahamas real estate purchases.	4900	2.00	\$360.00
09/10/24	DS	Review of 2018 Dallas Resources, Inc. transactions and Form 5495	3900	0.40	\$100.00
09/10/24	CB	Revising visual of Bahamas fund tracing and editing declaration to include discussion on tracing methods.	4900	0.70	\$227.50

Date	ID	Description	Task	Hours	Amount
09/11/24	JW	Accounting related to reconciliation of IBC and WAB accounts for July and August 2024.	2900	3.60	\$432.00
09/11/24	CB	Continue with edits to Bahamas property tracing visual and declaration.	4900	2.50	\$812.50
09/11/24	DS	Preparing the Form 5495 and review of 2018 Dallas Resources transaction	3900	1.70	\$425.00
09/12/24	CB	Review of calculation of Bahamas property tracing using different methods	4900	1.60	\$520.00
09/12/24	MA	Communication with Ms. Williamson, Mr. Cumming, and Ms. Huser to discuss project status. (1 hr. 36m) Review of work papers prior to the call (24m)	3900	2.00	\$650.00
09/12/24	SH	Communication with Ms. Williamson, Mr. Cumming, and Ms. Ahuja to discuss project status	2900	1.60	\$400.00
09/13/24	CB	Review and edits to fund tracing visuals and declaration on Bahamas tracing.	4900	5.60	\$1,820.00
09/13/24	NTH	Updating chart visuals for clarity and quality check of work product	4900	2.00	\$360.00
09/16/24	CB	Review of Barron bank statement activity based on comments from Receiver.	4900	0.40	\$130.00
09/16/24	JB	Transforming data into uniform format for effective analysis – Barron Petroleum LLC First State Bank	4900	0.60	\$72.00
09/16/24	SH	Review and update Barron Petroleum 2021 Forms 941/940; perform analysis on AOS payroll for estimation of Q4 2021 payroll tax	2900	2.50	\$625.00
09/16/24	JW	Uploading Barron Petroleum bank statements for conversion, clean up and categorizing transactions	4900	1.00	\$120.00
09/17/24	JW	Continue uploading Barron Petroleum bank statements for conversion, clean up and categorizing transactions	4900	5.00	\$600.00
09/17/24	AH	Uploading Barron Petroleum bank statements for conversion, clean up and categorizing transactions	4900	4.50	\$540.00
09/17/24	AK	Preparation of 2018 Form 1120 for Dallas Resources Inc.	3900	0.60	\$108.00
09/17/24	MA	Communication with Ms. Williamson, Ms. Bremer, and Ms. Huser regarding receivership updates.	3900	0.30	\$97.50
09/17/24	SH	Communication with Ms. Williamson, Ms. Ahuja, and Ms. Bremer regarding receivership updates.	2900	0.30	\$75.00
09/17/24	CB	Communication with Ms. Williamson, Ms. Ahuja, and Ms. Huser regarding receivership updates.	4900	0.30	\$97.50
09/17/24	SH	Perform analysis on AOS 2021 payroll transactions to formulate a basis for calculations of an estimate of Q4 2021 gross wages and associated tax	2900	1.80	\$450.00
09/19/24	JW	Start Q3 Preparation of SFAR workbook	2900	1.70	\$204.00
09/19/24	AK	Preparation of disclosure listing for the Dallas Resources Inc.	3900	0.60	\$108.00
09/19/24	SH	Communication with Ms. Shetty regarding AOS payroll; updating Barron Petroleum 941s and draft response letters	3900	3.00	\$750.00
09/19/24	DS	Review the Dallas Resources Inc. Form 1120 and the disclosures.	3900	1.50	\$375.00
09/20/24	DS	Review the cover letter for Dallas Resources, Inc.	3900	0.40	\$100.00
09/23/24	AH	Continue uploading Barron Petroleum bank statements for conversion, clean up and categorizing transactions	2900	2.30	\$276.00
09/23/24	CB	Review of additional bank statement activity and updates to Bahamas property tracing.	4900	0.50	\$162.50
09/23/24	SH	Continue draft calculations of AOS Q4 2021 estimated payroll and related tax obligation	2900	2.50	\$625.00
09/23/24	SH	Analysis of Barron Petroleum bank transaction data in the General Ledgers	4900	1.50	\$375.00
09/24/24	SH	Continue analysis of Barron Petroleum bank transaction data in the General Ledgers	4900	1.60	\$400.00
09/25/24	CB	Review of bank activity in Barron and Dallas Resource accounts.	4900	0.50	\$162.50
09/25/24	JW	Start preparation on Q3 SFAR	2900	0.80	\$96.00

Date	ID	Description	Task	Hours	Amount
09/25/24	SH	Complete draft AOS 2021 estimated payroll and related tax obligation for review	2900	1.00	\$250.00
09/25/24	SH	Review and analysis of Barron Petroleum IRS notices received compared to calculated potential tax owed	2900	0.30	\$75.00
09/26/24	SH	Review new Barron Petroleum IRS transcripts received for new filings and comparison with documents on file	2900	0.70	\$175.00
09/26/24	SH	Research how certain bank transactions were entered in the Barron Petroleum General Ledger	4900	0.10	\$25.00
09/26/24	CB	Review of Barron Petroleum and Dallas Resources bank activity	4900	0.70	\$227.50
09/27/24	MA	Review of AOS payroll calculations.	2900	1.00	\$325.00
09/27/24	SH	Communication with Ms. Ahuja regarding AOS calculations	2900	0.00	\$0.00
09/30/24	SH	Finalize analysis of AOS Q4 2021 payroll and tax calculations	2900	3.10	\$775.00
09/30/24	CB	Review of Barron Petroleum bank account activity and edits to declaration document.	4900	2.30	\$747.50
09/30/24	AK	Save all pertinent support for the 2018 Dallas Resources, Inc. Form 1120	3900	0.40	\$72.00

Total **\$45,214.50**

Balance Due **\$45,214.50**

NOTE: Total Fees are net of write off fees of \$3,227.50 primarily related to internal communications.

EXHIBIT E-6



410 Exchange, Ste 100
Irvine, CA 92602
855.812.6112

Invoice: 11793
Date: 07/02/2024
Due Date: 08/01/2024
Terms: Net 30

Bill To:
Heartland

Item	Quantity	Unit Price	Amount
June 2024 Invoice			
Hourly Fees			\$8,612.00
Printing	14	\$0.10	\$1.40
Postage			\$35.06
Envelopes and Packaging – See Noticing Summary for details			\$2.10
TOTAL DUE			\$8,650.56

THANK YOU.

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: 06/01/2024 - 06/30/2024

Role	Hours	Rate	Total
Analyst I	0.8	\$30.00	\$24.00
Analyst II	4.4	\$40.00	\$176.00
Analyst III	0.5	\$50.00	\$25.00
Associate I	2.6	\$65.00	\$169.00
Associate III	1.7	\$130.00	\$221.00
Director I	0.9	\$175.00	\$157.50
Director II	36.8	\$185.00	\$6,808.00
Managing Director II	2.5	\$205.00	\$512.50
Managing Director III	0.2	\$210.00	\$42.00
Senior Associate I	0.6	\$135.00	\$81.00
Senior Associate III	2.4	\$165.00	\$396.00
Total			\$8,612.00



Case Name: Heartland

Time Detail

Date Range: 06/01/2024 - 06/30/2024

Date	Employee Name	Role	Task	Description	Hours
06/03/2024	Keny Contreras	Analyst	Claims Administration and Objections	Process, scan, and upload proofs of claim	0.2
06/03/2024	Keny Contreras	Associate	Claims Administration and Objections	Input proofs of claim received into case management system	0.2
06/03/2024	Kevin Wasserman	Associate	Case Administration	Correspondence and closure of claims portal.	0.9
06/03/2024	Robert Saraceni	Director	Claims Administration and Objections	Review and respond to inquiry re 4b claim class	0.1
06/03/2024	Robert Saraceni	Director	Case Administration	Review and respond to inquiry re Class 4a claims	0.1
06/03/2024	Robert Saraceni	Director	Claims Administration and Objections	Tc with Receiver and A&C to discuss claim register and distributions; research variance between Stretto's current Class 4a claim amount and A&C's class 4a claim amount and advise Receiver.	0.9
06/03/2024	Robert Saraceni	Director	Claims Administration and Objections	Prepare variance analysis for Receiver showing reconciliation for Class 4a claim amounts between Stretto and A&C.	0.7
06/03/2024	Robert Saraceni	Director	Case Administration	Correspondence with D. Behrends re Class 4a claim variance	0.1
06/03/2024	Robert Saraceni	Director	Claims Administration and Objections	Correspondence with D. Behrends regarding closing of claim portal (.2); Correspondence with IT re closing of portal and messaging on portal landing page (.2)	0.4
06/03/2024	Robert Saraceni	Director	Claims Administration and Objections	Internal correspondence regarding additional non-investor creditor claims filed	0.3
06/03/2024	Stephanie Delgado	Associate	Case Administration	Oversee incoming undeliverable mail for accuracy and completeness	0.2
06/03/2024	Stephanie Morales	Analyst	Case Administration	Record and track undeliverable mail re: various mailings	0.1
06/03/2024	Stephanie Morales	Analyst	Case Administration	Sort and manage incoming mail re: various mailings	0.1
06/03/2024	Stephanie Morales	Analyst	Case Administration	Prepare and organize general case documents for accuracy and completeness	0.1
06/03/2024	Stephanie Morales	Analyst	Case Administration	Capture and track undeliverable mail images	0.1
06/03/2024	Stephen Cady	Managing Director	Case Administration	Coordinate opening of new distribution account and provide wire instructions	0.3
Subtotal 06/03/2024					4.8

Date	Employee Name	Role	Task	Description	Hours
06/04/2024	Dan McElhinney	Managing Director	Case Administration	Cons. B. Saraceni re case status and related issues (.2)	0.2

Date	Employee Name	Role	Task	Description	Hours
06/04/2024	IT Staff	Senior Associate	Case Administration	Close Claims Portal	1.5
06/04/2024	IT Staff	Senior Associate	Case Administration	Close Claims Portal	0.3
06/04/2024	Kevin Wasserman	Associate	Case Administration	Correspondence and closure of claims portal.	0.3
06/04/2024	Robert Saraceni	Director	Claims Administration and Objections	Prepare current claims report and forward to Receiver's office.	0.4
06/04/2024	Robert Saraceni	Director	Case Administration	Review correspondence and update records for additional W-9 forms forwarded.	0.9
06/04/2024	Stephanie Morales	Analyst	Case Administration	Record and track undeliverable mail re: various mailings	0.1
06/04/2024	Stephanie Morales	Analyst	Case Administration	Capture and track undeliverable mail images	0.1
Subtotal 06/04/2024					3.8

Date	Employee Name	Role	Task	Description	Hours
06/05/2024	Robert Saraceni	Director	Case Administration	Review correspondence and update records for additional W-9 forms forwarded.	0.9
Subtotal 06/05/2024					0.9

Date	Employee Name	Role	Task	Description	Hours
06/06/2024	Laura Tondreault	Analyst	Case Administration	Prepare and organize general case documents for accuracy and completeness	0.1
06/06/2024	Monica Arellano	Associate	Case Administration	Coordinate service re: various docket nos. per USPS forwarding instructions	0.3
06/06/2024	Robert Saraceni	Director	Case Administration	Review correspondence and update records for additional W-9 forms forwarded; update addresses as requested.	0.7
06/06/2024	Stephanie Morales	Analyst	Case Administration	Record and track undeliverable mail re: various mailings	0.1
06/06/2024	Stephanie Morales	Analyst	Case Administration	Capture and track undeliverable mail images	0.1
Subtotal 06/06/2024					1.3

Date	Employee Name	Role	Task	Description	Hours
06/07/2024	Pauline Aragon	Associate	Case Administration	Coordinate service re: Distribution Package per USPS forwarding instructions	0.7
06/07/2024	Robert Saraceni	Director	Claims Administration and Objections	Review claims for disbursement address - non-investor creditors	1.1
06/07/2024	Robert Saraceni	Director	Claims Administration and Objections	Review claims for disbursement address - investors	0.5
06/07/2024	Robert Saraceni	Director	Case Administration	Review correspondence and update records for additional W-9 forms forwarded.	0.5
06/07/2024	Robert Saraceni	Director	Case Administration	Review and update address files form COA reports	2.1
06/07/2024	Robert Saraceni	Director	Case Administration	Review correspondence and update records for additional W-9 forms forwarded.	0.3
06/07/2024	Stephanie Morales	Analyst	Case Administration	Record and track undeliverable mail re: various mailings	0.1

Date	Employee Name	Role	Task	Description	Hours
06/07/2024	Stephanie Morales	Analyst	Case Administration	Sort and manage incoming mail re: various mailings	0.1
Subtotal 06/07/2024					5.4
Date	Employee Name	Role	Task	Description	Hours
06/10/2024	IT Staff	Senior Associate	Case Administration	Address updates 6/10/24	0.3
06/10/2024	Pauline Aragon	Analyst	Case Administration	Sort and manage incoming mail re: various mailings	0.1
06/10/2024	Robert Saraceni	Director	Case Administration	Review correspondence and update records for additional W-9 forms forwarded.	0.3
06/10/2024	Robert Saraceni	Director	Case Administration	Process additional address updates	0.1
06/10/2024	Robert Saraceni	Director	Case Administration	Review correspondence and update records for additional W-9 forms forwarded.	0.1
06/10/2024	Robert Saraceni	Director	Case Administration	Review correspondence and update records for additional W-9 forms forwarded.	0.1
06/10/2024	Stephanie Morales	Analyst	Case Administration	Record and track undeliverable mail re: various mailings	0.1
06/10/2024	Stephanie Morales	Analyst	Case Administration	Sort and manage incoming mail re: various mailings	0.1
06/10/2024	Stephanie Morales	Analyst	Case Administration	Capture and track undeliverable mail images	0.1
Subtotal 06/10/2024					1.3
Date	Employee Name	Role	Task	Description	Hours
06/11/2024	Jason Bouzos	Senior Associate	Case Administration	Provide assistance with case and account setup	0.3
06/11/2024	Jenice Alduenda	Director	Case Administration	Conduct bank account security maintenance by reviewing account access settings	0.3
06/11/2024	Micheal Hale	Senior Associate	Case Administration	Uploading signature on file for future check creation	0.6
06/11/2024	Robert Saraceni	Director	Case Administration	Review request for distribution package to be sent to investor. Respond and confirm.	0.1
06/11/2024	Robert Saraceni	Director	Case Administration	Review correspondence and update records for additional W-9 forms forwarded.	1.0
06/11/2024	Stephanie Delgado	Associate	Case Administration	Oversee incoming undeliverable mail for accuracy and completeness	0.3
06/11/2024	Stephanie Morales	Analyst	Case Administration	Prepare and coordinate general case documents for transfer to offsite storage facility	0.1
06/11/2024	Stephanie Morales	Analyst	Case Administration	Record and track undeliverable mail re: various mailings	0.1
06/11/2024	Stephanie Morales	Analyst	Case Administration	Capture and track undeliverable mail images	0.1
Subtotal 06/11/2024					2.9
Date	Employee Name	Role	Task	Description	Hours
06/12/2024	Keny Contreras	Analyst	Case Administration	Sort and manage incoming mail re: various mailings	0.1
06/12/2024	Laura Tondreault	Analyst	Case Administration	Prepare and organize general case documents for accuracy and completeness	0.1

Date	Employee Name	Role	Task	Description	Hours
06/12/2024	Pauline Aragon	Associate	Case Administration	Coordinate service re: Distribution Package per USPS forwarding instructions	0.5
06/12/2024	Robert Saraceni	Director	Claims Administration and Objections	Review claim register and reconcile register to A&C number. Update distribution spreadsheet.	0.5
06/12/2024	Robert Saraceni	Director	Case Administration	Review correspondence and update records for additional W-9 forms forwarded.	0.4
06/12/2024	Stephanie Morales	Analyst	Case Administration	Prepare and coordinate general case documents for transfer to offsite storage facility	0.1
06/12/2024	Stephanie Morales	Analyst	Case Administration	Record and track undeliverable mail re: various mailings	0.1
06/12/2024	Stephanie Morales	Analyst	Case Administration	Sort and manage incoming mail re: various mailings	0.1
06/12/2024	Stephanie Morales	Analyst	Case Administration	Capture and track undeliverable mail images	0.1
Subtotal 06/12/2024					2.0

Date	Employee Name	Role	Task	Description	Hours
06/13/2024	Monica Arellano	Associate	Case Administration	Coordinate service re: various docket nos. per USPS forwarding instructions	0.2
Subtotal 06/13/2024					0.2

Date	Employee Name	Role	Task	Description	Hours
06/14/2024	Robert Saraceni	Director	Case Administration	Review correspondence and update records for additional W-9 forms forwarded.	0.6
06/14/2024	Robert Saraceni	Director	Case Administration	Review correspondence and update records for additional W-9 forms forwarded.	0.2
06/14/2024	Stephanie Morales	Analyst	Case Administration	Record and track undeliverable mail re: various mailings	0.2
06/14/2024	Stephanie Morales	Analyst	Case Administration	Capture and track undeliverable mail images	0.2
Subtotal 06/14/2024					1.2

Date	Employee Name	Role	Task	Description	Hours
06/17/2024	Pauline Aragon	Analyst	Case Administration	Sort and manage incoming mail re: various mailings	0.1
06/17/2024	Robert Saraceni	Director	Case Administration	Research and respond to D. Behrends request for investor address confirmation	0.1
06/17/2024	Robert Saraceni	Director	Case Administration	Review correspondence and update records for additional W-9 forms forwarded.	0.3
06/17/2024	Robert Saraceni	Director	Claims Administration and Objections	Review and update register and distribution schedules per judge's recommendations and forward to D. Behrends.	4.5
06/17/2024	Stephanie Morales	Analyst	Case Administration	Record and track undeliverable mail re: various mailings	0.1
06/17/2024	Stephanie Morales	Analyst	Case Administration	Sort and manage incoming mail re: various mailings	0.1
06/17/2024	Stephanie Morales	Analyst	Case Administration	Capture and track undeliverable mail images	0.1
Subtotal 06/17/2024					5.3

Date	Employee Name	Role	Task	Description	Hours
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Date	Employee Name	Role	Task	Description	Hours
06/18/2024	Pauline Aragon	Associate	Case Administration	Coordinate service re: Distribution Package per USPS forwarding instructions	0.5
06/18/2024	Robert Saraceni	Director	Case Administration	Review correspondence and update records for additional W-9 forms forwarded (.3); Update addresses (.2)	0.5
06/18/2024	Robert Saraceni	Director	Case Administration	Prepare Class 5 distribution worksheet (4.3); Review correspondence and update records for additional W-9 forms forwarded.(.4)	4.7
06/18/2024	Robert Saraceni	Director	Case Administration	Prepare Class 4 distribution schedules for 2 distribution scenarios.	2.0
06/18/2024	Stephanie Morales	Analyst	Case Administration	Prepare and coordinate general case documents for transfer to offsite storage facility	0.1
06/18/2024	Stephanie Morales	Analyst	Case Administration	Capture and track undeliverable mail images	0.1

Subtotal 06/18/2024 7.9

Date	Employee Name	Role	Task	Description	Hours
06/19/2024	Robert Saraceni	Director	Case Administration	Review correspondence and update records for additional W-9 forms forwarded.	0.9
06/19/2024	Robert Saraceni	Director	Case Administration	Update distribution report for Class 4 and Class 5 distributions	0.8

Subtotal 06/19/2024 1.7

Date	Employee Name	Role	Task	Description	Hours
06/20/2024	Laura Tondreault	Analyst	Case Administration	Prepare and organize general case documents for accuracy and completeness	0.1
06/20/2024	Monica Arellano	Associate	Case Administration	Coordinate service re: Distribution Package per USPS forwarding instructions	0.2
06/20/2024	Robert Saraceni	Director	Case Administration	Review and final update of distribution report, draft corr. to D. Behrends and forward report.	0.4
06/20/2024	Robert Saraceni	Director	Case Administration	Review correspondence and update records for additional W-9 forms forwarded; Update Class 5 distribution calculation as requested.	1.3
06/20/2024	Stephanie Morales	Analyst	Case Administration	Record and track undeliverable mail re: various mailings	0.1
06/20/2024	Stephanie Morales	Analyst	Case Administration	Capture and track undeliverable mail images	0.1
06/20/2024	Stephen Cady	Managing Director	Case Administration	Correspondence with B. Saraceni via email re: requirements for Railroad Commission of Texas distribution	0.1

Subtotal 06/20/2024 2.3

Date	Employee Name	Role	Task	Description	Hours
06/21/2024	Jenice Alduenda	Director	Case Administration	Respond to check inquiry for distributions	0.6
06/21/2024	Robert Saraceni	Director	Case Administration	Review correspondence and update records for additional W-9 forms forwarded.	0.2
06/21/2024	Robert Saraceni	Director	Case Administration	Review correspondence and update records for additional W-9 forms forwarded.	0.2

Subtotal 06/21/2024 1.0

Date	Employee Name	Role	Task	Description	Hours
06/23/2024	Stephen Cady	Managing Director	Case Administration	Correspondence with D. Behrends; D. Williamson via email re: logistics for settlement distributions	0.1
Subtotal 06/23/2024					0.1
Date	Employee Name	Role	Task	Description	Hours
06/24/2024	Casandra Segura	Analyst	Case Administration	Sort and manage incoming mail re: various mailings	0.1
06/24/2024	Robert Saraceni	Director	Case Administration	Review and respond to correspondence regarding format of disclaimer language on distribution check.	0.1
06/24/2024	Robert Saraceni	Director	Case Administration	Review correspondence and update records for additional W-9 forms forwarded.	1.5
06/24/2024	Stephanie Morales	Analyst	Case Administration	Record and track undeliverable mail re: various mailings	0.1
06/24/2024	Stephanie Morales	Analyst	Case Administration	Capture and track undeliverable mail images	0.1
06/24/2024	Stephanie Morales	Analyst	Case Administration	Sort and manage incoming mail re: various mailings	0.1
06/24/2024	Stephen Cady	Managing Director	Case Administration	Communication with banking partner and Stretto team re: logistics for settlement distributions	0.5
Subtotal 06/24/2024					2.5
Date	Employee Name	Role	Task	Description	Hours
06/25/2024	Casandra Segura	Analyst	Case Administration	Sort and manage incoming mail re: various mailings	0.1
06/25/2024	Laura Tondreault	Analyst	Case Administration	Prepare and organize general case documents for accuracy and completeness	0.1
06/25/2024	Morgan Wisbey	Director	Case Administration	Case setup and generate sample check	0.5
06/25/2024	Robert Saraceni	Director	Case Administration	TC with S. Cady re disclaimer language, font size and placement on distribution checks	0.2
06/25/2024	Robert Saraceni	Director	Case Administration	Review correspondence and update records for additional W-9 forms forwarded.	0.9
06/25/2024	Robert Saraceni	Director	Case Administration	Review of returned mail and update address for COA	1.8
06/25/2024	Stephanie Morales	Analyst	Case Administration	Record and track undeliverable mail re: various mailings	0.1
06/25/2024	Stephanie Morales	Analyst	Case Administration	Capture and track undeliverable mail images	0.1
06/25/2024	Stephen Cady	Managing Director	Case Administration	Communication with banking partner and Stretto team re: logistics for settlement distributions	0.5
Subtotal 06/25/2024					4.3
Date	Employee Name	Role	Task	Description	Hours
06/26/2024	Casandra Segura	Analyst	Case Administration	Sort and manage incoming mail re: various mailings	0.1
06/26/2024	Laura Tondreault	Analyst	Case Administration	Prepare and organize general case documents for accuracy and completeness	0.1
06/26/2024	Robert Saraceni	Director	Case Administration	Review correspondence and update records for additional W-9 forms forwarded.	0.6
06/26/2024	Robert Saraceni	Director	Case Administration	Review correspondence and update records for additional W-9 forms forwarded.	0.1

Date	Employee Name	Role	Task	Description	Hours
06/26/2024	Robert Saraceni	Director	Case Administration	Review correspondence and update records for additional W-9 forms forwarded.	0.3
06/26/2024	Robert Saraceni	Director	Case Administration	Perform analysis of outstanding W-9 forms and provide to Receiver	0.3
06/26/2024	Stephanie Morales	Analyst	Case Administration	Prepare and coordinate general case documents for transfer to offsite storage facility	0.1
06/26/2024	Stephanie Morales	Analyst	Case Administration	Record and track undeliverable mail re: various mailings	0.1
06/26/2024	Stephanie Morales	Analyst	Case Administration	Sort and manage incoming mail re: various mailings	0.1
06/26/2024	Stephanie Morales	Analyst	Case Administration	Capture and track undeliverable mail images	0.1
06/26/2024	Stephen Cady	Managing Director	Case Administration	Communication with banking partner and Stretto team re: logistics for settlement distributions	0.6
06/26/2024	Stephen Cady	Managing Director	Case Administration	Correspondence with D. Behrends; D. Williamson via email re: logistics for settlement distributions	0.3
06/26/2024	Stephen Cady	Managing Director	Case Administration	Correspondence with D. Behrends; D. Williamson via email re: logistics for settlement distributions	0.1
Subtotal 06/26/2024					2.9

Date	Employee Name	Role	Task	Description	Hours
06/27/2024	Robert Saraceni	Director	Case Administration	Review correspondence and update records for additional W-9 forms forwarded.	0.3
06/27/2024	Robert Saraceni	Director	Case Administration	Review correspondence and update records for additional W-9 forms forwarded (4); Pride statistics to Receiver on amount of TINs received for Class 4 and 5 distributions (.1)	0.5
06/27/2024	Robert Saraceni	Director	Case Administration	Review correspondence and update records for additional W-9 forms forwarded.	0.4
06/27/2024	Stephanie Morales	Analyst	Case Administration	Prepare and coordinate general case documents for transfer to offsite storage facility	0.1
06/27/2024	Stephanie Morales	Analyst	Case Administration	Record and track undeliverable mail re: various mailings	0.1
06/27/2024	Stephanie Morales	Analyst	Case Administration	Capture and track undeliverable mail images	0.1
Subtotal 06/27/2024					1.5

Date	Employee Name	Role	Task	Description	Hours
06/28/2024	Stephanie Morales	Analyst	Case Administration	Sort and manage incoming mail re: various mailings	0.1
Subtotal 06/28/2024					0.1

Total 06/01/2024 - 06/30/2024 53.4



Noticing Detail

Date of Service	Document(s) or Mailing Description	Number of Recipients	Method(s) of Service
6/6/2024	Various Mailings (USPS FORWARD)	6	First Class Mail
6/6/2024	Various Mailings (USPS FORWARD)	2	First Class Mail
6/13/2024	Heartland Mailing - Distribution Package (USPS FORWARD)	3	First Class Mail
6/13/2024	Investor Address File (USPS FORWARD)	1	First Class Mail
6/20/2024	Various Mailings (USPS FORWARD)	2	First Class Mail



410 Exchange, Ste 100
Irvine, CA 92602
855.812.6112

Invoice: 12564
Date: 09/15/2024
Due Date: 10/15/2024
Terms: Net 30

Bill To:
Heartland

Item	Quantity	Unit Price	Amount
August 2024 Invoice			
Hourly Fees			\$12,235.00
Printing	1,240	\$0.10	\$124.00
Postage			\$303.68
Envelopes and Packaging – See Noticing Summary for details			\$62.40
TOTAL DUE			\$12,725.08
			THANK YOU.
TOTAL ACCOUNT BALANCE DUE			\$18,836.96

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: 08/01/2024 - 08/31/2024

Role	Hours	Rate	Total
Analyst I	0.2	\$30.00	\$6.00
Analyst II	1.6	\$40.00	\$64.00
Analyst III	0.5	\$50.00	\$25.00
Associate	3.0	\$65.00	\$195.00
Director I	0.4	\$175.00	\$70.00
Director II	50.9	\$185.00	\$9,416.50
Managing Director II	3.6	\$205.00	\$738.00
Managing Director III	0.4	\$210.00	\$84.00
Senior Associate I	8.7	\$135.00	\$1,174.50
Senior Associate III	2.8	\$165.00	\$462.00
		Total	\$12,235.00



Case Name: Heartland

Time Detail

Date Range: 08/01/2024 - 08/31/2024

Date	Employee Name	Role	Task	Description	Hours
08/01/2024	Aimee Marshall	Associate	Case Administration	Generate service of Heartland W-9 Request Mailing 8.1.24 mailing including printing and fulfillment	0.1
08/01/2024	Alberto Chachagua	Associate	Case Administration	Generate service of Heartland W-9 Request Mailing 8.1.24 mailing including printing and fulfillment	0.5
08/01/2024	Melissa Membrino	Director	Case Administration	Coordinate service of Heartland W-9 Request Mailing 8.1.24 mailing including printing and fulfillment	0.5
08/01/2024	Ricky Quang	Associate	Case Administration	Generate service of Heartland W-9 Request Mailing 8.1.24 mailing including printing and fulfillment	0.5
08/01/2024	Sheryl Betance	Managing Director	Case Administration	Facilitate service of Heartland W-9 Request Mailing 8.1.24 mailing	0.4
Subtotal 08/01/2024					2.0

Date	Employee Name	Role	Task	Description	Hours
08/02/2024	Charles Wheeler	Associate	Case Administration	Administrative review of mailing details	0.1
08/02/2024	Robert Saraceni	Director	Case Administration	Prepare COS for 8.1.2024 W-9 Request Letter mailing.	0.7
08/02/2024	Robert Saraceni	Director	Case Administration	Review correspondence and update for W-9s received and address updates	0.6
08/02/2024	Stephanie Morales	Analyst	Case Administration	Record and track undeliverable mail re: various mailings	0.1
08/02/2024	Stephanie Morales	Analyst	Case Administration	Capture and track undeliverable mail images	0.1
Subtotal 08/02/2024					1.6

Date	Employee Name	Role	Task	Description	Hours
08/04/2024	Robert Saraceni	Director	Case Administration	Review correspondence and update for W-9s received, update addresses and claim records	0.9
Subtotal 08/04/2024					0.9

Date	Employee Name	Role	Task	Description	Hours
08/05/2024	Robert Saraceni	Director	Case Administration	Review correspondence and update for W-9s received, update addresses and claim records	0.2
Subtotal 08/05/2024					0.2

Date	Employee Name	Role	Task	Description	Hours
08/06/2024	Robert Saraceni	Director	Case Administration	Draft correspondence to Receiver regarding distribution requirements.	0.3
Subtotal 08/06/2024					0.3

Date	Employee Name	Role	Task	Description	Hours
08/07/2024	Robert Saraceni	Director	Case Administration	Review Class 4 and Class 4a distribution calculations and prepare report of distribution to Receiver for approval	1.8
Subtotal 08/07/2024					1.8

Date	Employee Name	Role	Task	Description	Hours
08/08/2024	Laura Tondreault	Analyst	Case Administration	Prepare and organize general case documents for accuracy and completeness	0.1
08/08/2024	Pauline Aragon	Associate	Case Administration	Coordinate service re: W-9 Request Mailing per USPS forwarding instructions	0.6
Subtotal 08/08/2024					0.7

Date	Employee Name	Role	Task	Description	Hours
08/09/2024	Pauline Aragon	Associate	Case Administration	Coordinate service re: W-9 Request Mailing per USPS forwarding instructions	0.5
08/09/2024	Robert Saraceni	Director	Case Administration	Review correspondence and update for W-9s received, update addresses, claim records and respond to inquiries regarding calculation of NTA.	0.6
Subtotal 08/09/2024					1.1

Date	Employee Name	Role	Task	Description	Hours
08/10/2024	Robert Saraceni	Director	Case Administration	Begin preparation of Class 5 final distribution report.	0.5
08/10/2024	Robert Saraceni	Director	Case Administration	Complete and review Class 5 distribution calculations and forward distribution report to Receiver for final approval	0.3
Subtotal 08/10/2024					0.8

Date	Employee Name	Role	Task	Description	Hours
08/12/2024	Aimee Marshall	Associate	Case Administration	Administrative review of mailing details	0.1
08/12/2024	Laura Tondreault	Analyst	Case Administration	Prepare and organize general case documents for accuracy and completeness	0.1
08/12/2024	Pauline Aragon	Associate	Case Administration	Administrative review of mailing details	0.1
08/12/2024	Robert Saraceni	Director	Case Administration	Prepare Final Class 5 distribution, insert remittance addresses as per claim detail or W-9 and provide hold information and any special requested information for memo line of check	2.1
08/12/2024	Stephanie Morales	Analyst	Case Administration	Record and track undeliverable mail re: various mailings	0.1
Subtotal 08/12/2024					2.5

Date	Employee Name	Role	Task	Description	Hours
08/13/2024	Micheal Hale	Senior Associate	Case Administration	Reactivation and update of login password	0.1
08/13/2024	Naomi Rodriguez	Associate	Case Administration	Administrative review of mailing details	0.1
08/13/2024	Robert Saraceni	Director	Case Administration	Prepare Final Class 4 and 4a distributions, insert remittance addresses as per claim detail or W-9 and provide hold information	1.4

Date	Employee Name	Role	Task	Description	Hours
08/13/2024	Robert Saraceni	Director	Case Administration	Review correspondence and update for W-9s received, update addresses and claim records	0.4
Subtotal 08/13/2024					2.0

Date	Employee Name	Role	Task	Description	Hours
08/14/2024	Laura Tondreault	Analyst	Case Administration	Prepare and organize general case documents for accuracy and completeness	0.1
08/14/2024	Monica Arellano	Associate	Case Administration	Coordinate service re: W9 Letter per USPS forwarding instructions	0.1
08/14/2024	Robert Saraceni	Director	Case Administration	Review correspondence and update for W-9s received, update addresses, claim records and 8.26.2024 distribution files	2.9
08/14/2024	Staphany Alcantar	Analyst	Case Administration	Correspondence with Stretto team re: processing correspondence	0.1
08/14/2024	Staphany Alcantar	Analyst	Case Administration	Case file case related documents	0.3
Subtotal 08/14/2024					3.5

Date	Employee Name	Role	Task	Description	Hours
08/15/2024	Robert Saraceni	Director	Case Administration	Review correspondence and update for W-9s received, update addresses, claim records and 8.26.2024 distribution files	1.1
08/15/2024	Stephanie Morales	Analyst	Case Administration	Prepare and organize general case documents for accuracy and completeness	0.2
Subtotal 08/15/2024					1.3

Date	Employee Name	Role	Task	Description	Hours
08/16/2024	Casandra Segura	Analyst	Case Administration	Sort and manage incoming mail re: various mailings	0.1
08/16/2024	Jenice Alduenda	Director	Case Administration	Heartland meeting to discuss distribution steps for next week	0.4
08/16/2024	Laura Tondreault	Analyst	Case Administration	Prepare and organize general case documents for accuracy and completeness	0.1
08/16/2024	Morgan Wisbey	Director	Case Administration	Communication with CR Team via Teams re: Distribution coordination	0.5
08/16/2024	Robert Saraceni	Director	Case Administration	Draft correspondence to disbursement group regarding Class 4, 4a and 5 files and timing of distribution	0.4
08/16/2024	Robert Saraceni	Director	Case Administration	Attend call with distribution team retiming of distribution	0.4
08/16/2024	Robert Saraceni	Director	Case Administration	Review and respond to internal team inquiries as to status of 8.26.2024 distribution.	0.1
08/16/2024	Stephanie Morales	Analyst	Case Administration	Record and track undeliverable mail re: various mailings	0.1
08/16/2024	Stephanie Morales	Analyst	Case Administration	Capture and track undeliverable mail images	0.1
08/16/2024	Stephen Cady	Managing Director	Case Administration	Conference with Stretto team re: Cover Letter for Distribution Check Packages and Timeline	0.5
Subtotal 08/16/2024					2.7

Date	Employee Name	Role	Task	Description	Hours
08/18/2024	Robert Saraceni	Director	Case Administration	Review correspondence and update for W-9s received, update addresses, claim records and 8.26.2024 distribution files	0.7
Subtotal 08/18/2024					0.7

Date	Employee Name	Role	Task	Description	Hours
08/19/2024	Morgan Wisbey	Director	Case Administration	Coordinate check production, including import of data into case management system	1.0
08/19/2024	Robert Saraceni	Director	Case Administration	Create final class 4, 4a and class 5 distribution files and forward to distribution group.	2.2
08/19/2024	Stephanie Morales	Analyst	Case Administration	Record and track undeliverable mail re: various mailings	0.1
08/19/2024	Stephen Cady	Managing Director	Case Administration	Review distributions related communication and activity, and advise team re: same	0.3
Subtotal 08/19/2024					3.6

Date	Employee Name	Role	Task	Description	Hours
08/20/2024	Kevin Streseman	Director	Case Administration	Create report of W-9 files received	0.8
08/20/2024	Morgan Wisbey	Director	Case Administration	Communication with R. Saraceni via phone re: Additional claimant checks	0.2
08/20/2024	Pauline Aragon	Associate	Case Administration	Coordinate service re: W-9 Request Mailing per USPS forwarding instructions	0.3
08/20/2024	Robert Saraceni	Director	Case Administration	Add additional W-9's received at deadline and prepare supplemental Class 4 and Class 4a distribution files and forward to Stretto distribution team	1.0
08/20/2024	Stephen Cady	Managing Director	Case Administration	Review distributions related communication and activity, and advise team re: same	0.1
Subtotal 08/20/2024					2.4

Date	Employee Name	Role	Task	Description	Hours
08/21/2024	Micheal Hale	Senior Associate	Case Administration	Review bank data to identify cleared checks and reconcile account for ledger detail report	0.1
Subtotal 08/21/2024					0.1

Date	Employee Name	Role	Task	Description	Hours
08/22/2024	Jason Bouzos	Senior Associate	Case Administration	Review check images for quality control and fraud mitigations	0.6
08/22/2024	Jason Bouzos	Senior Associate	Case Administration	Review check images for quality control and fraud mitigations	1.3
08/22/2024	Micheal Hale	Senior Associate	Case Administration	Review check images for quality control and fraud mitigations	4.1
08/22/2024	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	5.7
08/22/2024	Morgan Wisbey	Director	Case Administration	Communication with R. Saraceni via email re: Distribution	0.2
08/22/2024	Morgan Wisbey	Director	Case Administration	Communication with C. Wheeler via phone re: Lorde check modifications	0.5
08/22/2024	Ruben Guevara	Senior Associate	Case Administration	Review check images for quality control and fraud mitigations	4.0

Date	Employee Name	Role	Task	Description	Hours
08/22/2024	Stephen Cady	Managing Director	Case Administration	Review and respond to email communication re: distribution requirements and remaining details for quality control and fraud mitigation	1.8
Subtotal 08/22/2024					18.2

Date	Employee Name	Role	Task	Description	Hours
08/23/2024	Jason Bouzos	Senior Associate	Case Administration	Review check images for quality control and fraud mitigations	0.9
08/23/2024	Morgan Wisbey	Director	Case Administration	Communication with D. Williamson via email re: Distribution request forms	0.5
08/23/2024	Morgan Wisbey	Director	Case Administration	Communication with D. Behrends via email re: Hold distribution	0.2
08/23/2024	Stephanie Morales	Analyst	Case Administration	Prepare and organize general case documents for accuracy and completeness	0.1
08/23/2024	Stephen Cady	Managing Director	Case Administration	Review distributions related communication and activity, and advise team re: same	0.3
Subtotal 08/23/2024					2.0

Date	Employee Name	Role	Task	Description	Hours
08/26/2024	Laura Tondreault	Analyst	Case Administration	Prepare and organize general case documents for accuracy and completeness	0.1
08/26/2024	Robert Saraceni	Director	Case Administration	Begin preparation of Second Class 4 and 4a distribution reports, review incoming correspondence and update for W-9's received.	5.3
08/26/2024	Stephanie Morales	Analyst	Case Administration	Record and track undeliverable mail re: various mailings	0.1
08/26/2024	Stephanie Morales	Analyst	Case Administration	Capture and track undeliverable mail images	0.1
Subtotal 08/26/2024					5.6

Date	Employee Name	Role	Task	Description	Hours
08/27/2024	Robert Saraceni	Director	Case Administration	Continue preparation of Second Class 4 and 4a distribution reports, review incoming correspondence and update for W-9's received and update addresses	3.3
08/27/2024	Robert Saraceni	Director	Case Administration	Continue preparation of Second Class 4 and 4a distribution reports, review incoming correspondence and update for W-9's received and update addresses	2.7
08/27/2024	Stephanie Morales	Analyst	Case Administration	Record and track undeliverable mail re: various mailings	0.1
Subtotal 08/27/2024					6.1

Date	Employee Name	Role	Task	Description	Hours
08/28/2024	Robert Saraceni	Director	Case Administration	Continue preparation of Second Class 4 and 4a distribution reports, review incoming correspondence and update for W-9's received and update addresses	1.9
08/28/2024	Robert Saraceni	Director	Case Administration	Prepare 4a TIN report requested by A. Dominguez.	0.3
08/28/2024	Robert Saraceni	Director	Case Administration	Process additional W-9's and update Class 4 and 4a Second Distribution Report	0.3
08/28/2024	Robert Saraceni	Director	Case Administration	Process additional W-9's and update Class 4 and 4a Second Distribution Report	1.1
Subtotal 08/28/2024					3.6

Date	Employee Name	Role	Task	Description	Hours
08/29/2024	Casandra Segura	Analyst	Case Administration	Sort and manage incoming mail re: various mailings	0.1
08/29/2024	Morgan Wisbey	Director	Case Administration	Communication with S. Cady via email re: Distribution	0.2
08/29/2024	Morgan Wisbey	Director	Case Administration	Communication with R. Saraceni via email re: Updated distribution data	0.5
08/29/2024	Morgan Wisbey	Director	Case Administration	Coordinate updated check production, including import of data into case management system	1.5
08/29/2024	Robert Saraceni	Director	Case Administration	Correspondence with disbursements team regarding rescheduled initial disbursement	0.1
08/29/2024	Robert Saraceni	Director	Case Administration	Correspondence with Receiver regarding rescheduled initial disbursement	0.1
08/29/2024	Robert Saraceni	Director	Case Administration	Prepare revised Class 4, 4a and 5 initial disbursement reports as requested by Receiver.	2.9
08/29/2024	Stephen Cady	Managing Director	Case Administration	Review distributions related communication and activity, and advise team re: same	0.2
Subtotal 08/29/2024					5.6

Date	Employee Name	Role	Task	Description	Hours
08/30/2024	Micheal Hale	Senior Associate	Case Administration	Review check images for quality control and fraud mitigations	0.2
08/30/2024	Morgan Wisbey	Director	Case Administration	Review check images for quality control and fraud mitigations	2.0
08/30/2024	Ruben Guevara	Senior Associate	Case Administration	Review check images for quality control and fraud mitigations	0.2
08/30/2024	Stephen Cady	Managing Director	Case Administration	Review distributions related communication and activity, and advise team re: same	0.4
Subtotal 08/30/2024					2.8

Total 08/01/2024 - 08/31/2024 72.1



Noticing Detail

Date of Service	Document(s) or Mailing Description	Number of Recipients	Method(s) of Service
8/1/2024	Heartland W-9 Request Mailing 8.1.24	412	First Class Mail
8/14/2024	W-9 Request Mailing (USPS FORWARD)	3	First Class Mail
8/22/2024	W-9 Request Mailing (USPS FORWARD)	1	First Class Mail



410 Exchange, Ste 100
Irvine, CA 92602
855.812.6112

Invoice: 12779
Date: 10/15/2024
Due Date: 11/14/2024
Terms: Net 30

Bill To:
Heartland

Item	Quantity	Unit Price	Amount
September 2024 Invoice			
Hourly Fees			\$18,002.25
Printing	4,698	\$0.10	\$469.80
Postage			\$696.05
Envelopes and Packaging – See Noticing Summary for details			\$141.00
Expense Exhibit (See Attachment)			\$1,177.50
TOTAL DUE			\$20,486.60
			THANK YOU.
TOTAL ACCOUNT BALANCE DUE			\$39,323.56

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: 09/01/2024 - 09/30/2024

Role	Hours	Rate	Total
Analyst II	0.8	\$40.00	\$32.00
Analyst III	0.3	\$50.00	\$15.00
Associate I	1.3	\$65.00	\$84.50
Associate II	0.1	\$97.50	\$9.75
Associate III	2.4	\$130.00	\$312.00
Director I	7.3	\$175.00	\$1,277.50
Director II	63.6	\$185.00	\$11,766.00
Managing Director II	7.3	\$205.00	\$1,496.50
Managing Director III	0.8	\$210.00	\$168.00
Senior Associate I	16.4	\$135.00	\$2,214.00
Senior Associate III	3.8	\$165.00	\$627.00
Total			\$18,002.25



Case Name: Heartland

Time Detail

Date Range: 09/01/2024 - 09/30/2024

Date	Employee Name	Role	Task	Description	Hours
09/03/2024	Robert Saraceni	Director	Case Administration	Research and provide A. Dominguez a list of names of joint investment accounts	1.4
Subtotal 09/03/2024					1.4
Date	Employee Name	Role	Task	Description	Hours
09/04/2024	Morgan Wisbey	Director	Case Administration	Update mailing address on two claimants and rebuild distribution	0.5
09/04/2024	Morgan Wisbey	Director	Case Administration	Update distribution date and rebuild check images	1.0
09/04/2024	Morgan Wisbey	Director	Case Administration	Coordinate production images for Locke Lord checks	0.5
09/04/2024	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	1.0
09/04/2024	Robert Saraceni	Director	Case Administration	W-9 reconciliation, update for additional W-9s received, revise Class 4 and Class 4a distribution records.	6.7
09/04/2024	Ruben Guevara	Senior Associate	Case Administration	Review check images for quality control and fraud mitigations	1.0
09/04/2024	Stephen Cady	Managing Director	Case Administration	Review distributions related communication and activity and coordinate same	0.8
Subtotal 09/04/2024					11.5
Date	Employee Name	Role	Task	Description	Hours
09/05/2024	Morgan Wisbey	Director	Case Administration	Communication with D.Cohen via email re: Check data discrepancy	0.2
09/05/2024	Robert Saraceni	Director	Case Administration	W-9 reconciliation, update for additional W-9s received, revise Class 4 and Class 4a distribution records.	4.9
09/05/2024	Robert Saraceni	Director	Case Administration	W-9 reconciliation, update for additional W-9s received, revise Class 4 and Class 4a distribution recor	2.9
Subtotal 09/05/2024					8.0
Date	Employee Name	Role	Task	Description	Hours
09/06/2024	Morgan Wisbey	Director	Case Administration	Remove two parties and rebuild distribution	1.0
09/06/2024	Morgan Wisbey	Director	Case Administration	Generate updated check register	0.5
09/06/2024	Robert Saraceni	Director	Case Administration	Complete W-9 reconciliation, draft corr. to Receiver re: potential payees to remove from 9.11.2024 distribution, draft corr. to Stretto disbursements team re: same, prepare complete list of parties who have submitted W-9s and those that have not and prepare corr. to Receiver.	1.3

Date	Employee Name	Role	Task	Description	Hours
09/06/2024	Robert Saraceni	Director	Case Administration	Draft and send additional corr. to Stretto disbursements team regarding removal of additional party from the Class 4 and 4a distribution. Prepare W-9 status report	1.8
09/06/2024	Robert Saraceni	Director	Case Administration	Update all files for revised 9.11.2024 distribution date	0.3
09/06/2024	Stephanie Morales	Analyst	Case Administration	Review undeliverable mail and images for accuracy and completeness	0.1
09/06/2024	Stephen Cady	Managing Director	Case Administration	Review distributions related communication and activity and coordinate same	0.3
Subtotal 09/06/2024					5.3

Date	Employee Name	Role	Task	Description	Hours
09/08/2024	Robert Saraceni	Director	Case Administration	Update for additional W-9s received	0.3
Subtotal 09/08/2024					0.3

Date	Employee Name	Role	Task	Description	Hours
09/09/2024	Morgan Wisbey	Director	Case Administration	Coordinate check production with disclaimer for Locke Lord checks	0.5
09/09/2024	Morgan Wisbey	Director	Case Administration	Communication with D.Williamson via email re: disbursement request	0.2
09/09/2024	Robert Saraceni	Director	Case Administration	Review and respond to investor inquiry.	0.2
09/09/2024	Robert Saraceni	Director	Case Administration	Update for additional W-9s received	0.4
09/09/2024	Stephen Cady	Managing Director	Case Administration	Review distributions related communication and activity and coordinate same	0.2
Subtotal 09/09/2024					1.5

Date	Employee Name	Role	Task	Description	Hours
09/10/2024	Jason Bouzos	Senior Associate	Case Administration	Review check images for quality control and fraud mitigations	2.5
09/10/2024	Jenice Alduenda	Director	Case Administration	Review check images for quality control and fraud mitigations	1.1
09/10/2024	Jenice Alduenda	Director	Case Administration	Review check images for quality control and fraud mitigations	1.0
09/10/2024	Jenice Alduenda	Director	Case Administration	Review check images for quality control and fraud mitigations	1.4
09/10/2024	Micheal Hale	Senior Associate	Case Administration	Review check images for quality control and fraud mitigations	2.4
09/10/2024	Morgan Wisbey	Director	Case Administration	Communication with F.Brown via email re: review of high-dollar checks	0.5
09/10/2024	Morgan Wisbey	Director	Case Administration	Prepare disbursement request form and exhibits	0.7
09/10/2024	Morgan Wisbey	Director	Case Administration	Communication with D.Williamson via email re: disbursement request authorization	0.2
09/10/2024	Robert Saraceni	Director	Case Administration	Review Class 4, Class 4a and Class 5 distribution reports	2.2
09/10/2024	Robert Saraceni	Director	Case Administration	Update for additional W-9s received	2.9
09/10/2024	Ruben Guevara	Senior Associate	Case Administration	Review check images for quality control and fraud mitigations	2.5

Date	Employee Name	Role	Task	Description	Hours
09/10/2024	Stephen Cady	Managing Director	Case Administration	Review distributions related communication and activity and coordinate same	1.2

Subtotal 09/10/2024 18.6

Date	Employee Name	Role	Task	Description	Hours
09/11/2024	David Bribiesca	Associate	Case Administration	Generate service of Heartland Investors Distribution mailing including printing and fulfillment	1.0
09/11/2024	David Bribiesca	Associate	Case Administration	Generate service of Heartland Locke Lord Distribution mailing including printing and fulfillment	1.0
09/11/2024	Melissa Membrino	Director	Case Administration	Coordinate service of Heartland Operators Distribution - USPS mailing including printing and fulfillment	0.3
09/11/2024	Melissa Membrino	Director	Case Administration	Coordinate service of Heartland Locke Lord Distribution mailing including printing and fulfillment	0.5
09/11/2024	Melissa Membrino	Director	Case Administration	Coordinate service of Heartland Investors Distribution mailing including printing and fulfillment	0.5
09/11/2024	Morgan Wisbey	Director	Case Administration	Communication with D.Williamson via email re: Confirm checks are in production	0.2
09/11/2024	Morgan Wisbey	Director	Case Administration	Communication with R.Saraceni via email re: Distribution status	0.2
09/11/2024	Naomi Rodriguez	Associate	Case Administration	Generate service of Heartland Operators Distribution - Priority mailing including printing and fulfillment	0.2
09/11/2024	Naomi Rodriguez	Associate	Case Administration	Generate service of Heartland Operators Distribution - USPS mailing including printing and fulfillment	0.2
09/11/2024	Naomi Rodriguez	Associate	Case Administration	Generate service of Heartland Locke Lord Distribution mailing including printing and fulfillment	0.2
09/11/2024	Naomi Rodriguez	Associate	Case Administration	Generate service of Heartland Investors Distribution mailing including printing and fulfillment	0.2
09/11/2024	Sheryl Betance	Managing Director	Case Administration	Facilitate service of Heartland Locke Lord Distribution mailing	0.4
09/11/2024	Sheryl Betance	Managing Director	Case Administration	Facilitate service of Heartland Investors Distribution mailing	0.4
09/11/2024	Stephen Cady	Managing Director	Case Administration	Review distributions related communication and activity and coordinate same	0.1

Subtotal 09/11/2024 5.4

Date	Employee Name	Role	Task	Description	Hours
09/12/2024	IT Staff	Senior Associate	Case Management	Dan account access	0.5
09/12/2024	Jenice Alduenda	Director	Case Administration	Upload positive pay files through online banking for check distributions	1.4
09/12/2024	Morgan Wisbey	Director	Case Administration	Generate ledger reports for positive pay per J.Alduenda	0.5
09/12/2024	Morgan Wisbey	Director	Case Administration	Communication with D.Williamson via email re: Confirm distribution is complete	0.2
09/12/2024	Robert Saraceni	Director	Case Administration	Update for additional W-9s received	0.8
09/12/2024	Robert Saraceni	Director	Case Administration	Update for additional W-9s received	0.4
09/12/2024	Robert Saraceni	Director	Case Administration	Update for additional W-9s received	0.8

Date	Employee Name	Role	Task	Description	Hours
09/12/2024	Stephen Cady	Managing Director	Case Administration	Review distributions related communication and activity and coordinate same	0.5
Subtotal 09/12/2024					5.1
Date	Employee Name	Role	Task	Description	Hours
09/13/2024	Robert Saraceni	Director	Case Administration	Update for additional W-9s received	0.4
09/13/2024	Robert Saraceni	Director	Case Administration	Update for additional W-9s received	0.3
Subtotal 09/13/2024					0.7
Date	Employee Name	Role	Task	Description	Hours
09/16/2024	Micheal Hale	Senior Associate	Case Administration	Initiate stop payments on checks [reissue request] per R. Saraceni	0.1
09/16/2024	Morgan Wisbey	Director	Case Administration	Communication with R.Saraceni via email re: Distribution	0.2
09/16/2024	Morgan Wisbey	Director	Case Administration	Coordinate check production for Locke Lord disclaimer	0.5
09/16/2024	Robert Saraceni	Director	Case Administration	Update for additional W-9s received, draft corr. to disbursements team for reissuance of disbursement checks, update records for disbursements.	1.3
09/16/2024	Robert Saraceni	Director	Case Administration	Prepare and send W-9 status report	0.8
09/16/2024	Robert Saraceni	Director	Case Administration	Update for additional W-9s received, draft corr. to A. Dominguez re W-9 issue for select investor.	0.8
09/16/2024	Stephen Cady	Managing Director	Case Administration	Review reissue related communication and activity, and advise team re: same	0.2
Subtotal 09/16/2024					3.9
Date	Employee Name	Role	Task	Description	Hours
09/17/2024	Aimee Marshall	Associate	Case Administration	Generate service of Heartland Check Reissues 2024.09.16 mailing including printing and fulfillment	0.2
09/17/2024	Jenice Alduenda	Director	Case Administration	Upload positive pay file through online banking for check distribution	0.3
09/17/2024	Jose Cruz	Associate	Case Administration	Review distribution request and format data for check production	0.1
09/17/2024	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	0.7
09/17/2024	Morgan Wisbey	Director	Case Administration	Communication with R.Saraceni via email re: confirmation of check mailing and ledger report	0.2
09/17/2024	Robert Saraceni	Director	Case Administration	Update for additional W-9s received, process address updates and review current check register, confirm check reissues	1.4
09/17/2024	Stephanie Morales	Analyst	Case Administration	Record and track undeliverable mail re: various mailings	0.1
09/17/2024	Stephanie Morales	Analyst	Case Administration	Capture and track undeliverable mail images	0.1
09/17/2024	Stephen Cady	Managing Director	Case Administration	Review reissue related communication and activity, and advise team re: same	0.3
Subtotal 09/17/2024					3.4
Date	Employee Name	Role	Task	Description	Hours

Date	Employee Name	Role	Task	Description	Hours
09/18/2024	Laura Tondreault	Analyst	Case Administration	Prepare and organize general case documents for accuracy and completeness	0.1
09/18/2024	Micheal Hale	Senior Associate	Case Administration	Review bank data to identify cleared checks and reconcile account for ledger detail report	2.2
09/18/2024	Morgan Wisbey	Director	Case Administration	Communication with S.Cady via email re: Reissued checks	0.2
09/18/2024	Robert Saraceni	Director	Case Administration	Review, research, and respond to A. Dominguez inquiry into investor request as to status of their distribution.	0.5
09/18/2024	Robert Saraceni	Director	Case Administration	Update for additional W-9s received and process address updates	0.8
09/18/2024	Stephen Cady	Managing Director	Case Administration	Review reissue related communication and activity, and advise team re: same	0.5
Subtotal 09/18/2024					4.3

Date	Employee Name	Role	Task	Description	Hours
09/19/2024	Charles Wheeler	Associate	Case Administration	Administrative review of mailing details	0.1
09/19/2024	Micheal Hale	Senior Associate	Case Administration	Review bank data to identify cleared checks and reconcile account for ledger detail report	1.3
09/19/2024	Robert Saraceni	Director	Case Administration	Review and respond to D. Behrends inquiry regarding status of investor distribution.	0.1
09/19/2024	Robert Saraceni	Director	Case Administration	Provide distribution amounts for investor as requested by D. Behrends	0.1
09/19/2024	Robert Saraceni	Director	Case Administration	Review and respond to request from A. Dominguez on status of investor distribution checks.	0.1
09/19/2024	Robert Saraceni	Director	Case Administration	Update for additional W-9s received and process address updates	1.1
09/19/2024	Stephen Cady	Managing Director	Case Administration	Review reissue related communication and activity, and advise team re: same	0.3
Subtotal 09/19/2024					3.1

Date	Employee Name	Role	Task	Description	Hours
09/20/2024	Jason Bouzos	Senior Associate	Case Administration	Establish online access	0.3
09/20/2024	Jason Bouzos	Senior Associate	Case Administration	Complete ledger updates to assist with reconciliation	0.5
09/20/2024	Jenice Alduenda	Director	Case Administration	Review check status per inquiry from D Behrends	0.6
09/20/2024	Micheal Hale	Senior Associate	Case Administration	Review bank data to identify cleared checks and reconcile account for ledger detail report	1.4
09/20/2024	Morgan Wisbey	Director	Case Administration	Research and communication with R.Saraceni via email re: Check clearing status	0.5
09/20/2024	Robert Saraceni	Director	Case Administration	Prepare distribution and W-9 status reports for Class 4 and Class 4a investor distributions	1.3
09/20/2024	Robert Saraceni	Director	Case Administration	Update for additional W-9s received and update W-9 status reports for Class 4 and Class 4a investor distributions	0.5
09/20/2024	Robert Saraceni	Director	Case Administration	Review and respond to D. Behrends inquiry regarding investor check deposit issue (.1); Follow up with disbursements team (.1)	0.2
09/20/2024	Robert Saraceni	Director	Case Administration	Review and respond to T. Dick confirmation of investor W-9 address	0.1

Date	Employee Name	Role	Task	Description	Hours
09/20/2024	Robert Saraceni	Director	Case Administration	Review corr. form M. Wisbey on status of investor's checks.	0.1
09/20/2024	Robert Saraceni	Director	Case Administration	Review further corr. from D. Behrends on status of investor distribution check deposit issue.	0.1
09/20/2024	Robert Saraceni	Director	Case Administration	Review, research and respond to A. Dominguez inquiry into status of distribution for a select investor	0.2
09/20/2024	Stephen Cady	Managing Director	Case Administration	Communication with banking partner re: maintenance of no-fee bank accounts	0.4
09/20/2024	Stephen Cady	Managing Director	Case Administration	Review distributions related communication and activity, and advise team re: same	0.2
Subtotal 09/20/2024					6.4

Date	Employee Name	Role	Task	Description	Hours
09/23/2024	Laura Tondreault	Analyst	Case Administration	Prepare and organize general case documents for accuracy and completeness	0.1
09/23/2024	Micheal Hale	Senior Associate	Case Administration	Review bank data to identify cleared checks and reconcile account for ledger detail report	1.5
09/23/2024	Naomi Rodriguez	Associate	Case Administration	Administrative review of mailing details	0.4
09/23/2024	Robert Saraceni	Director	Case Administration	Review corr. from Receiver's office regarding timing of next distribution iteration (.1); research and respond to investor inquiry regarding distribution status (.2)	0.3
09/23/2024	Robert Saraceni	Director	Case Administration	Update for additional W-9s received and process address updates	1.2
09/23/2024	Stephen Cady	Managing Director	Case Administration	Review distributions related communication and activity, and advise team re: same	0.3
Subtotal 09/23/2024					3.8

Date	Employee Name	Role	Task	Description	Hours
09/24/2024	Micheal Hale	Senior Associate	Case Administration	Review bank data to identify cleared checks and reconcile account for ledger detail report	0.9
09/24/2024	Morgan Wisbey	Director	Case Administration	Research status of checks	0.5
09/24/2024	Morgan Wisbey	Director	Case Administration	Communication with A.Dominguez via email re: Status of checks	0.2
09/24/2024	Morgan Wisbey	Director	Case Administration	Communication with R.Saraceni via email re: Confirm receipt of check research request	0.2
09/24/2024	Robert Saraceni	Director	Case Administration	Update for additional W-9s received, reconcile distribution hold and release lists	0.4
09/24/2024	Robert Saraceni	Director	Case Administration	Update for additional W-9s received and process address updates	0.9
09/24/2024	Stephen Cady	Managing Director	Case Administration	Review distributions related communication and activity, and advise team re: same	0.4
Subtotal 09/24/2024					3.5

Date	Employee Name	Role	Task	Description	Hours
09/25/2024	Micheal Hale	Senior Associate	Case Administration	Review bank data to identify cleared checks and reconcile account for ledger detail report	1.4
09/25/2024	Stephanie Morales	Analyst	Case Administration	Record and track undeliverable mail re: various mailings	0.1
09/25/2024	Stephanie Morales	Analyst	Case Administration	Record and track undeliverable mail re: Distribution Checks	0.1

Date	Employee Name	Role	Task	Description	Hours
09/25/2024	Stephen Cady	Managing Director	Case Administration	Review distributions related communication and activity, and advise team re: same	0.3
Subtotal 09/25/2024					1.9
Date	Employee Name	Role	Task	Description	Hours
09/26/2024	Micheal Hale	Senior Associate	Case Administration	Review bank data to identify cleared checks and reconcile account for ledger detail report	0.7
09/26/2024	Stephanie Morales	Analyst	Case Administration	Record and track undeliverable mail re: various mailings	0.1
09/26/2024	Stephanie Morales	Analyst	Case Administration	Record and track undeliverable mail re: Distribution Checks	0.1
09/26/2024	Stephanie Morales	Analyst	Case Administration	Capture and track undeliverable mail images	0.1
09/26/2024	Stephen Cady	Managing Director	Case Administration	Review distributions related communication and activity, and advise team re: same	0.2
Subtotal 09/26/2024					1.2
Date	Employee Name	Role	Task	Description	Hours
09/27/2024	Aimee Marshall	Associate	Case Administration	Generate service of Heartland - Reissue Checks mailing including printing and fulfillment	0.1
09/27/2024	Jenice Alduenda	Director	Case Administration	Prepare re-issue request	1.3
09/27/2024	Morgan Wisbey	Director	Case Administration	Generate Check Images per D.Behrends	1.2
09/27/2024	Morgan Wisbey	Director	Case Administration	Coordinate check production	0.7
09/27/2024	Morgan Wisbey	Director	Case Administration	Communication with R.Saraceni via email re: Confirmation of check reissue	0.2
09/27/2024	Robert Saraceni	Director	Case Administration	Update for additional W-9s received and process address updates	3.0
09/27/2024	Stephen Cady	Managing Director	Case Administration	Review reissue related communication and activity, and advise team re: same	0.7
Subtotal 09/27/2024					7.2
Date	Employee Name	Role	Task	Description	Hours
09/30/2024	Felicia Turner	Associate	Case Administration	Perform review of documents to determine the total file size for monthly for secure digital file retention	0.1
09/30/2024	Jenice Alduenda	Director	Case Administration	Upload positive pay file through online banking for reissues	0.2
09/30/2024	Laura Tondreault	Analyst	Case Administration	Prepare and organize general case documents for accuracy and completeness	0.1
09/30/2024	Micheal Hale	Senior Associate	Case Administration	Review bank data to identify cleared checks and reconcile account for ledger detail report	1.0
09/30/2024	Morgan Wisbey	Director	Case Administration	Account maintenance	0.5
09/30/2024	Morgan Wisbey	Director	Case Administration	Communication with R.Saraceni via email re: Receipt of check status request	0.2
09/30/2024	Robert Saraceni	Director	Case Administration	Update for additional W-9's receive, process address update requests, review and respond to Receiver request, reconcile second iteration distribution list and remaining distributions pending receipt of W-9.	3.4
09/30/2024	Robert Saraceni	Director	Case Administration	Update for additional W-9s received, process address updates and attend to distribution reissues	1.7

Date	Employee Name	Role	Task	Description	Hours
09/30/2024	Stephen Cady	Managing Director	Case Administration	Review distributions related communication and activity, and advise team re: same	0.4
Subtotal 09/30/2024					7.6
Total 09/01/2024 - 09/30/2024					104.1



Noticing Detail

Date of Service	Document(s) or Mailing Description	Number of Recipients	Method(s) of Service
9/11/2024	Heartland Operators Distribution - Priority	1	Priority Mail
9/11/2024	Heartland Operators Distribution - USPS	34	First Class Mail
9/11/2024	Heartland Locke Lord Distribution	451	First Class Mail
9/11/2024	Heartland Investors Distribution	452	First Class Mail
9/17/2024	Heartland Check Reissues 2024.09.16	1	First Class Mail
9/27/2024	Heartland - Reissue Checks	1	First Class Mail



Case Name: Heartland

Summary of Expenses

Date Range: 09/01/2024 - 09/30/2024

Description	Quantity	Rate	Total	Total Charges
Large document binding and misc. noticing expenses - See Noticing Detail for additional information			\$1,177.50	\$1,177.50
			Total	\$1,177.50

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

Bloomfield Hills
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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

Alanna M. Dominguez

Associate



Contact

San Antonio
210-554-5237
adominguez@dykema.com

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



Victoria Flores

Litigation Staff Paralegal
112 E. Pecan Street, Suite 1800
San Antonio, Texas 78205
(210) 554-5465
VFlores@dykema.com

Victoria obtained her Paralegal Certificate through the University of Texas of San Antonio and has more than 30 years of experience in the legal field in several diverse areas of law, predominately in Litigation, Intellectual Property and Bankruptcy. Her experience includes assisting in litigation from the initial filings to the case conclusion including, drafting pleadings, responding to discovery requests, organizing and indexing document productions, scheduling, calendaring, interfacing with expert witnesses, preparing for and participating in hearings and trials.

Teresa Ereon Giltner

Member



Contact

Dallas
214-698-7870
tgiltner@dykema.com

Overview

To effectively serve her real estate, banking, and corporate finance clients in their most consequential matters, Teresa Ereon Giltner pays meticulous attention to the smallest details while seeing the bigger picture. And she has seen it all during the decades she has provided candid counsel and facilitated countless transactions.

Teresa's experience, insights, and ability to anticipate and address potential problems have made her an invaluable asset for institutional lenders, private equity interests, developers, and others involved in complex commercial real estate and financing matters. She advises clients on complicated real estate acquisitions, leasing, development and finance projects, and associated land-use challenges.

Teresa also assists the bankruptcy and creditors' rights team on real estate, personal property, and corporate finance matters.

Committed to timeless qualities like honesty, loyalty, responsiveness, and respect, Teresa develops and sustains long-term relationships with her clients.

They appreciate her precision when tailoring documents or establishing the structures that protect and advance their interests. But they also value the clarity of her guidance, even if that guidance means changing directions on a project or acquisition.

Teresa is board-certified in commercial real estate law by the Texas Board of Legal Specialization. She has earned not only the trust of her clients but the admiration of her peers, who have consistently recognized her for her professionalism and success in real estate and finance matters.

Areas of client focus

Practices

Real Estate
Restructuring and Bankruptcy

Industries

Financial Services

Experience

Bankruptcy – Regional Homebuilders

Member of a team representing regional homebuilders in Chapter 11 cases, which allowed the debtors to complete construction on dozens of otherwise unfinished houses, pay down lenders through ordinary course sales of finished houses and sell substantially all of the company's assets through bulk sales of the remaining houses and lots.

In re Renaissance Hospital – Grand Prairie, Inc. et al., Bankruptcy Case No. 08-43775-11, pending in the United States Bankruptcy Court for the Northern District of Texas, Ft. Worth Division

Representation of an equipment lessor/financier.

Bankruptcy – Restaurant Chain Acquisition

Member of a team representing an acquirer of numerous leases/assets and real property through a Chapter 11 proceeding.

Gasoline Stations – Acquisitions

- Acquisition from Shell Oil Products US of 278 of its service stations in Southern California, with a transaction value in excess of \$230 million. Transaction was significant not only because of the dollar amount involved and the number of sites involved, but also because of the significant time constraints.
- Acquisition from USA Petroleum Corporation of over 100 of its service stations in Southern California, Washington and New Mexico, with a transaction value in excess of \$270 million. Transaction was significant not only because of the dollar amount involved and the number of sites involved, but also because of the significant time constraints.

Public-Private Partnership Negotiation

Representation of the City of San Marcos in connection with a public-private partnership for the development of a 250-room hotel and adjacent 80,000 square foot conference facility.

East Texas Timber Ranch – Acquisition

Significant East Texas timber land/ranch acquisition project that included review, research and resolution as to over 300 title exceptions, numerous survey and access issues, timber cutting agreements, lands allocated to the preservation of endangered species, easements, pipelines, mineral development history, and review of current water rights issues. The project was unique due to the nature and history of the property.

Texas Land Acquisition and Development

Texas land acquisition and development project that included all aspects of land acquisition, as well as review and resolution of water rights, title claims and lawsuits, lawsuits affecting title to the property, environmental issues, financing components, and complicated title and local development issues. Project also included coordination of entity formation and tax advice. Project closed in 2007 after approximately eight months of diligence and issue resolution.

Retail Leasing

- Representation of a 500+ store national retailer in connection with store leases nationwide.
- Representation of a 1,000+ location global telecommunications company with retail leases nationwide.

- Representation of landlords in connection with commercial office leases.
- Representation of tenants in connection with commercial office leases including lease negotiations, default (eviction) and lease termination matters.

Financings

- Numerous acquisition and development loans for residential subdivisions for throughout Texas.
- Line of Credit loans for homebuilders ranging in size from \$5 million to \$150 million
- Commercial loans ranging in size from under \$1 million to \$50 million.
- Representation of a private investor as an asset-based lender in a debtor-in-possession financing transaction through a bankruptcy reorganization.
- Representation of a large publicly traded company as a proposed purchaser/lender in a debtor-in-possession financing transaction through a bankruptcy reorganization.

Financial Hedging

- Commercial real estate loans involving financial hedges and related documents.

Credentials

Education

- University of Notre Dame Law School, J.D., 1986
- Grand Valley State University, B.A., 1983

Bar Admissions

- Texas

Professional Recognition

- Recognized in *The Best Lawyers in America*® for Real Estate Law; Bankruptcy and Creditor Debtor Rights / Insolvency and Reorganization Law, 2021-Present
- Martindale-Hubbell® AV® Preeminent™ [Peer Review Rating](#)
- Selected as a "Texas Super Lawyer," 2003, 2009, 2010 and 2011
- CREW San Antonio Eva Rosow Award Recipient—Outstanding Woman in Commercial Real Estate, 2008
- S.A. Scene, "San Antonio's Best Lawyers," 2007-2008

Affiliations

Professional

- Dykema Women's Business Initiative, National WBI Co-Leader
- Dallas Bar Association
- Texas Board of Law Examiners, Appointed eff. Sept. 1, 2011
- San Antonio Bar Association

- CREW Dallas, President Elect, 2015
- CREW Dallas, Board Member, 2013, 2014
- CREW Dallas, Member, 2009- present
- Catholic Charities of Dallas, Inc., Advisory Board of Directors, 2009-2013
- CREW San Antonio, President, 2007-2008
- Archdiocese of San Antonio, Catholic Charities, Inc., Director, 2004-2008
- Attorneys Serving the Community, 2010-present

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

VICKI PALMOUR CONSULTING, LLC

AMY AMBURN

Married

Mother of 3 (14 year old and 10 year old twins)

After graduating college worked as a bank auditor before quitting to have children. Has worked for VPC 2-1/2 years. Handles approximately 20 WolfePak accounts

EXHIBIT F-6



Ahuja & Consultants, Inc.

Certified Public Accountants

Ahuja & Clark Staff Supporting Fee Application

Ammon Hall

Ammon serves as forensic support for this engagement. Ammon started with A&C as an intern in 2023 and has since graduated with a bachelor's in accounting and has been a full time staff accountant with A&C since January of 2024.

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.

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.

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.

Natasha Toeteberg-Harms

Natasha serves as forensic support for this engagement. She brings over 5 years of experience to Ahuja & Consultants, having most recently worked as a Senior Consultant within the Forensics practice of a large public accounting firm in Zürich, Switzerland. Natasha's project experience includes topics of corporate compliance, regulatory compliance assessments, bribery and



Ahuja & Consultants, Inc.

Certified Public Accountants

corruption investigations, financial statement fraud, procurement fraud, and accounting irregularities. Her skills include project management of large and complex multinational projects and advising and assisting clients on fraud risk management.

EXHIBIT F-7

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.

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.

Pauline Aragon

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

Alberto Chachaqua

In his role as Print Production Associate, in Production, Alberto 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.

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.

IT Staff

IT Staff responsibilities are the development, implementation, and maintenance of the secure, custom online claims portal.

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.

Monica Arellano

Moneca Arellano is an Intake Specialist in Operations responsible for reviewing and updating changes of address and coordinating forwarding of various mailings per USPS forwarding instructions.

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.

Stephanie Delgado

Stephanie Delgado is Assistant Operations Manager in Operations responsible for overseeing claims intake and input, correspondence review and filing, review and processing of undeliverable mail and processing address changes.

Casandra Segura

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.

David Bribiesca

In his role as Print Production Associate in Production, David 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.

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.

Kevin Streseman

With over 25 years of IT experience and two decades working in Corporate Restructuring, Kevin Streseman bring a unique perspective to the industry. From analyzing and processing data to designing solutions for client requests and providing various reporting solutions, Kevin has been an integral part in numerous high-profile cases, including Lehman Brothers, Delta Airlines, United Airlines, Chrysler, and the Los Angeles Dodgers.

Felicia Turner

Felicia Turner is an experienced associate with over 15 years of corporate restructuring experience. She specializes in claim intake and review, provides critical support to case teams, and plays a key role in special projects. Prior to her current role, she worked at Kurtzman Carson Consultants, LLC, where she was instrumental in the operations side, improving workflow processes and supporting high-profile cases. She also spent 3 years working in mass tort at Kurtzman Carson Consultants. Her expertise and attention to detail make her a vital asset to the team.