

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, §
§

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

Defendants, §
§

and §
§

DODSON PRAIRIE OIL & GAS LLC; PANTHER §
CITY ENERGY LLC; MURATORE FINANCIAL §
SERVICES, INC.; BRIDY IKEY; ENCYPHER §
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. §
§

**RECEIVER'S FEE APPLICATION FOR SERVICES PERFORMED BETWEEN
OCTOBER 1, 2025 AND DECEMBER 31, 2025, 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* [ECF No. 180] (the “Ahuja Employment Order”) approving the *Application to Employ Ahuja & Clark, PLLC as Accountants to Receiver Effective April 1, 2022*, 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*, and the *Order* [ECF No. 718] approving the *Expedited Application to Employ Higgs & Johnson as Bahamian Counsel to Receiver Effective as of March 7, 2025* [ECF No. 709] (the “H&J Employment Order”), Deborah D. Williamson, in her capacity as the Court-appointed Receiver (the “Receiver”) for the Receivership Parties (as defined in the *Order Appointing Receiver* [ECF No. 17] (the “Receivership Order”))¹ and receivership estates (collectively, the “Receivership Estates”) in the above-captioned case (the “Case” or the “Receivership”), hereby submits this *Receiver's Fee Application for Services Performed Between October 1, 2025 and December 31, 2025, and Brief in Support* (the “Application”) of Deborah D. Williamson, as Receiver, Dykema Gossett PLLC (“Dykema”), Higgs & Johnson (“H&J”), Ahuja & Clark, PLLC n/k/a Ahuja & Consultants, Inc. (“Ahuja”), and Stretto, Inc. (“Stretto”). In support of the Application, the Receiver respectfully states as follows:

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

I. OVERVIEW

1. As more fully detailed in the *Receiver's Seventeenth Quarterly Report for Receivership Estates (October 1, 2025 – December 31, 2025)* [ECF No. 808] (the “Seventeenth Report”), the Receiver, with the assistance of her Retained Personnel, is in possession of and has secured the two (2) pieces of real property located on Cat Island in the Commonwealth of the Bahamas (the “Bahamas Properties”) and filed the *Motion for Approval of Real Property Sale Procedures for the Bahamas Properties and Request for Leave to Shorten Time and Expedite Consideration* [ECF No. 798], obtaining Court approval of procedures governing the sale of the Bahamas Properties, including limiting the number of appraisals, procedures for employment of a broker, and compensation of H&J, and communicated with various creditors, including investors (potential and known), vendors, and governmental agency contacts.

2. The Receiver and her team continued to communicate with investors (known and potential), creditors, and other stakeholders via email regarding Case status and distribution procedure. The website (www.heartlandreceivership.com) is continuously updated with key court documents, notices, and reports.

3. The Receiver, Dykema, and the professionals employed on behalf of the Receiver in this Case are very cognizant of the need to balance performance of their duties with costs. Comparing this Application Period to the prior, the overall amount requested in fees and expenses by the Receiver, Dykema, and the professionals employed on behalf of the Receiver decreased from \$85,010.35 total in the third quarter of 2025 to \$27,335.00 total in this Application Period.

4. Dykema has voluntarily reduced the requested reimbursement by \$6,430.00, including time spent by the Receiver and by Dykema attorneys during the Application Period.

5. At the beginning of the fourth quarter of 2025, the Receiver had \$1,429,443.67 on deposit. At the end of the fourth quarter of 2025, the amount on deposit was \$1,277,429.13 after issuance of Court-approved distributions and payments of operating expenses and Court-approved fees and expenses. As of the filing of this Application (February 13, 2026), \$1,277,627.07 is in the Receivership bank accounts.

II. RELIEF REQUESTED

6. This Application seeks authorization from the Court to pay on an interim basis fees and expenses for professional services performed from October 1, 2025 through December 31, 2025 (the “Application Period”), by the Receiver in the amount of \$3,105.00 for fees; Dykema, as lead counsel to the Receiver, in the amount of \$27,335.00 for fees and in the amount of \$6,881.01 for expenses; H&J, as Bahamian counsel to the Receiver, in the amount of B\$1,550.00 for fees, in the amount of B\$155.00 for the 10% Value Added Tax (“VAT”), totaling B\$1,705.00; Ahuja, as tax and forensic accountants to the Receiver, in the amount of \$9,839.00 for fees; and Stretto, as claims and disbursement agent to the Receiver, in the amount of \$3,770.50 for fees. The Receiver respectfully requests this Court enter the proposed order attached hereto as **Exhibit B**, approving this Application on an interim basis and authorizing the Receiver to pay outstanding amounts approved thereunder.

7. The Receivership Order at ¶ 62 requires that the “Receiver and Retained Personnel shall apply to the Court for compensation and expense reimbursement from the Receivership Estates” within forty-five (45) days of the end of each calendar quarter. Thus, this Application covers October 1, 2025 through December 31, 2025.

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, 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, 668, 741, 785, 797. Through the third quarter of 2025, the Receiver, Dykema, Ahuja, H&J, 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, 620, 712, 747, 793, 804. 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, Plaintiff, United States Securities and Exchange Commission (the “Commission”), filed its application for the appointment of a receiver for the Receivership Parties.

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. 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).

13. 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.² Dykema has agreed to keep the discounted rates until further notice.

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

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

16. 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”).

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

² The Receiver’s standard hourly rate for 2021 was \$840.00, for 2022 was \$880.00, for 2023 was \$950.00, for 2024 was \$980.00, and 2025 was \$1,010.00. The Receiver’s standard hourly rate for 2026 is \$1,040.00. Dykema members’ and senior counsels’ standard hourly rates ranged from \$425.00-\$925.00 for 2021, \$425.00-\$1,400.00 for 2022, \$470.00-\$1,400.00 for 2023, \$515.00-\$1,095.00 for 2024, and \$545.00-\$1,350.00 for 2025. Dykema members’ and senior counsels’ standard hourly rates range from \$590.00-\$1,390.00 for 2026. Dykema associates’ and senior attorneys’ standard hourly rates ranged from \$370.00-\$505.00 for 2021, \$395.00-\$530.00 for 2022, \$395.00-\$610.00 for 2023, \$425.00-\$625.00 for 2024, and \$435.00-\$655.00 for 2025. Dykema associates and senior attorneys’ standard hourly rates range from \$460.00-\$710.00 for 2026.

18. 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").

19. 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].

20. On March 11, 2025, the Receiver filed her *Expedited Application to Employ Higgs & Johnson as Bahamian Counsel to Receiver Effective as of March 7, 2025* [ECF No. 709] (the "H&J Application").

21. After considering the H&J Application at the March 17, 2025 hearing, this Court entered the H&J Employment Order [ECF No. 712].

22. On July 3, 2025, the Receiver filed her *Expedited Application to Employ Pricewaterhouse Coopers Advisory (Bahamas) Limited as Bahamian Restructuring Consultant to the Receiver Effective as of July 2, 2025* [ECF 750] (the "PwC Application").

23. On July 14, 2025, after considering the PwC Application at the July 14, 2025 hearing, this Court entered the PwC Employment Order [ECF No. 758].

B. Work Performed During the Application Period

24. 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 and execution of the Court-approved claims and distribution procedures.

25. 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], *Receiver's Twelfth Quarterly Report for Receivership Estates* [ECF No. 601], *Amended Receiver's Thirteenth Quarterly Report for Receivership Estates* [ECF No. 668], *Receiver's Fourteenth Quarterly Report for Receivership Estates* [ECF No. 740], *Receiver's Fifteenth Quarterly Report* [ECF No. 767], *Receiver's Fifteenth Quarterly Report for Receivership Estates* [ECF No. 795], *Receiver's Sixteenth Quarterly Report for Receivership Estates* [ECF No. 795], and the *Seventeenth Quarterly Report* (collectively, the "Receiver's Quarterly Reports") for information regarding the Case status, as required by the Commission Billing Instructions and the Receivership Order.

26. Generally, the bulk of Dykema's services rendered during the Application Period included drafting pleadings, notices, and other documents, including, but not limited to, approval of sale procedures for the Bahamas Properties; assisting the Receiver with mitigation of risks; and responding to a number of investors, particularly relating to the status of judgments entered by the Commission and overall status of the Case. Dykema did not charge the Receivership Estates for time preparing this Application or the underlying billing statements. A summarized description of Dykema's services during the Application Period is detailed below.

27. Ahuja's services rendered during the Application Period largely related to general accounting work, reports, and reconciliation of records in preparation for filing of the federal tax returns for the required Receivership Parties.

28. Stretto's services rendered during the Application Period included preparing and revising investor and non-investor matrices and assisting the Receiver with responding to investor inquiries.

29. H&J's services rendered during the Application Period included providing the Receiver with advice related to recovery of the Bahamas Properties.

C. Fees and Expenses Summary During the Application Period

30. 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 66.10 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 \$27,335.00 and expenses incurred in connection with services performed on behalf of the Receiver during the Application Period total \$6,881.01.³

31. The Receiver expended an aggregate of 4.60 hours on this Case during the Application Period. The Receiver's fees for the Application Period total \$3,105.00.

32. H&J expended an aggregate of 2.25 hours on this Case during the Application Period. H&J's fees for the Application Period total B\$1,550.00, in addition to B\$155.00 for the 10% VAT. H&J's total compensation requested during this Application Period is B\$1,705.00.

³ 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.

33. Ahuja expended an aggregate of 43.50 hours on this Case during the Application Period. Ahuja's fees for the Application Period total \$9,839.00. Ahuja did not incur any expenses during the Application Period.

34. Stretto expended an aggregate of 14.30 hours on this Case during the Application Period. Stretto's fees for the Application Period total \$3,770.50. Stretto did not incur any expenses during the Application Period.

IV. RECORDS SUPPORTING THIS APPLICATION

35. No agreement or understanding, written or oral, express, or implied, exists between Dykema, H&J, 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.

36. The Receiver, Dykema, H&J, Ahuja, and Stretto kept contemporaneous time records on a daily basis and tracked their billings on a tenth-of-an-hour⁴ basis with time charges allocated accordingly.

37. All services performed by Dykema, H&J, 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, H&J's, Ahuja's, and Stretto's services have been substantial, necessary, and beneficial to the Receiver and the Receivership Estates.

38. Dykema, H&J, 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

⁴ H&J's billing software only permits time entries on a quarter-of-an-hour basis. Therefore, H&J's invoice for the Application Period includes time entries based on a quarter-of-an-hour basis instead of a tenth-of-an-hour basis.

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.

39. In addition, Dykema has categorized their services by task.⁵ 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 \$6,881.01 in expenses in connection with the rendition of services on behalf of the Receiver. The Receiver, Ahuja, H&J, and Stretto did not incur any expenses during the Application Period.

40. Attached hereto as **Exhibit E-1** is the invoice of Dykema, with the Receiver's time attributable to the Bahamas Litigation separated out. Attached hereto as **Exhibit E-2** is the invoice of H&J during the Application Period. Attached hereto as **Exhibit E-3** is the invoice of Ahuja during the Application Period. Attached hereto as **Exhibit E-4** 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 in this Case, the Receiver respectfully submits that the requested compensation is reasonable.

41. Dykema, H&J, 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

⁵ H&J's invoice for this Application Period does not contain task categories due to their limited engagement as Bahamian counsel to the Receiver. All tasks performed by H&J related to providing Bahamian legal advice to the Receiver and/or drafting and filing Bahamian pleadings on behalf of the Receiver with respect to her official recognition as "Foreign Representative" in The Bahamas for Barron Petroleum (as defined below) and Arcooil and/or recovery of the Bahamas Properties.

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

42. 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

43. 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, H&J, Ahuja, and Stretto and any expenses incurred during the Application Period.

44. 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).

45. 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 recovering the Bahamas Properties as Receivership Assets and preparing the Bahamas Properties for sale.

46. 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, H&J, 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.

47. Since December 2021, the Receiver and her team have successfully recovered over \$25 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.

48. 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, and F-5** for the Receiver, Dykema, H&J, Ahuja, and Stretto, respectively.⁶

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

50. 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 and distribution procedures; analyzing various distribution methodologies; and communicating with hundreds of investors, pre-receivership vendors, opposing counsel, the

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

Commission, the Internal Revenue Service (the “IRS”), and other various other state and federal governmental agencies—all at a discounted rate.

51. 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, H&J’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

52. 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.

53. 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.

54. 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 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) Facilitating administrative and daily operational tasks requested by the Receiver;
- (d) Mitigating risks;
- (e) Pursuing and/or settling causes of action held by the Receivership Estates; and
- (f) Working with PwC and H&J in the recovery and security of the Bahamas Properties, as well as the preparing the Bahamas Properties for sale.

55. Dykema has served as lead counsel to the Receiver throughout this Case and has represented the Receiver in all proceedings, in addition to Rose L. Romero with the Law Offices of Romero | Kozub. 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.

H&J

56. During the Application Period, H&J's services rendered during the Application Period included providing the Receiver with advice related to her duties as Foreign

Representative. Additionally, H&J continues to work with PwC to prepare sale documentation for the Bahamas Properties.

Ahuja

57. During the Application Period, Ahuja performed routine general accounting work for all Receivership Parties and began preparing the federal tax returns for the required Receivership Parties, including preparation of 1099's for the Receiver's Retained Personnel. Additionally, Ahuja assisted in responding to numerous notices from the IRS and to the Receiver's counsel on questions related to tax payments made and/or returns filed by the Receiver.

Stretto

58. 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 and continued to update investor and non-investor contact information during the Application Period at the request of Dykema.

PwC

59. During the Application Period, PwC assisted the Receiver in The Bahamas with various responsibilities related to the Bahamas Properties, including upkeep and security, as well as assisted her with administrative tasks to carry out her responsibilities and duties as Receiver in The Bahamas. In line with PwC's commitment to cost efficiency for the Receivership Estates, PwC has deferred seeking approval of fees and costs until the Bahamas Properties have been listed for sale.

Fees and Expenses of Receiver's Retained Personnel

60. The Receiver and her Retained Personnel have performed a substantial amount of work during the Application Period; however, work remains on the termination of various

Receivership Parties, the potential recovery of additional fraudulent transfers, and the sale of the Bahamas Properties.

61. The Receiver, Dykema, H&J, 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.

62. The chart below depicts the total fees and expenses requested by the Receiver, Dykema, H&J, 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	4.60 hours	\$3,105.00	\$0.00
Dykema Gossett PLLC	65.30 hours	\$27,013.00	\$6,881.01
Dykema Gossett PLLC – Bahamas Litigation	0.80 hours	\$322.00	\$0.00
Higgs & Johnson ⁷	2.25 hours	B\$1,550.00	B\$0.00
Ahuja & Clark, PLLC n/k/a Ahuja & Consultants, Inc.	43.50 hours	\$9,839.00	\$0.00
Stretto, Inc.	14.30 hours	\$3,770.50	\$0.00

63. 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 throughout this Case and confirm the same.

⁷ The total compensation requested by H&J during the Application Period is B\$1,705.00, including 10% VAT in the amount of B\$155.00.

64. 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, and E-5** 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 funds available will exceed approximately \$1,225,146.56, exclusive of any future recovery.

VII. CONCLUSION

65. 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 \$3,105.00, (ii) all fees incurred by Dykema as counsel to the Receiver during the Application Period, totaling \$27,335.00, (iii) all fees incurred by H&J as Bahamian counsel to the Receiver during the Application Period, totaling B\$1,550.00 and the 10% VAT in the amount of B\$155.00, (iv) all fees incurred by Ahuja as tax and forensic accountants to the Receiver during the Application Period, totaling \$9,839.00, and (vi) all fees incurred by Stretto as claims and disbursement agent to the Receiver during the Application Period, totaling \$3,770.50; (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 \$6,881.01; (c) authorizing the Receiver to pay (i) all authorized outstanding fee amounts to Dykema, including the Receiver's fees, totaling \$30,440.00, (ii) all authorized outstanding fee amounts to H&J, totaling B\$1,550.00 and the 10% VAT in the amount of B\$155.00, (iii) all authorized outstanding fee amounts to Ahuja, totaling \$9,839.00, and (iv) all authorized outstanding fee amounts to Stretto, totaling \$3,770.50;

(d) authorizing the Receiver to pay (i) all authorized outstanding expenses of Dykema, totaling \$6,881.01; and (e) awarding such other and further relief that this Court deems just and proper.

Dated: February 16, 2026

Respectfully submitted,

By: /s/ Deborah D. Williamson
Deborah D. Williamson
(*Receiver*)
State Bar No. 21617500
dwilliamson@dykema.com
DYKEMA GOSSETT PLLC
112 East Pecan Street, Suite 1800
San Antonio, Texas 78205
Telephone: (210) 554-5500
Facsimile: (210) 226-8395

Danielle R. Behrends
State Bar No. 24086961
dbehrends@dykema.com
Dominique A. Douglas
State Bar No. 21434409
ddouglas@dykema.com
DYKEMA GOSSETT PLLC
112 East Pecan Street, Suite 1800
San Antonio, Texas 78205
Telephone: (210) 554-5500
Facsimile: (210) 226-8395

and

Tara A. Archer-Glasgow
HIGGS & JOHNSON
Ocean Centre, Montagu Foreshore
East Bay Street
Nassau, The Bahamas
Telephone: (242) 502-5200

COUNSEL 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 February 16, 2026, 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/ Danielle Rushing Behrends

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 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

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 H&J'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) H&J 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 H&J justifiably purchased or contracted for from a third party, H&J requests reimbursement only for the amount billed by the third-party vendor and paid for by H&J 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/ Tara A. Archer-Glasgow
Tara A. Archer-Glasgow
Higgs & Johnson
Applicant

EXHIBIT A

		Detail	Subtotal	Grand Total
1	Beginning Balance (July 1, 2025):			\$ 2,079,367.04
2	Business Income		50.82	50.82
3	Cash and Cash Equivalents		-	-
4	Interest/Dividend Income		3,653.74	3,653.74
5	Business Asset Liquidation		-	-
6	Personal Asset Liquidation		-	-
7	Third-Party Litigation Income		-	-
8	Miscellaneous - Other	funds recd	-	-
	Total Funds Available			\$ 2,083,071.60
9	Disbursements to Investors			\$ 34,715.15
		Class 4, 4a	34,715.15	
		Class 5	-	
10	Disbursements for Receivership Operations			\$ 618,912.78
10a	Disbursements to Receiver or Other Professionals	Payments to Attorneys, Accountants, Receiver	385,689.54	
10b	Business Asset and Operating Expenses	Filing fees, Insurance	36,095.20	
10c	Personal Asset Expenses		-	
10d	Investment Expenses		-	
10e	Third-Party Litigation Expenses		-	
10f	Tax Administrator Fees and Bonds		-	
10g	Federal and State Tax Expenses		197,128.04	
11	Disbursements for Distribution Expenses Paid by the Fund		-	
11a	Distribution Plan Development Expenses		-	
11b	Distribution Plan Implementation Expenses		-	
12	Disbursements to Court/Other		-	
12a	Court Registry Investment System (CRIS) or other banking fees related to the Fund.		-	
12b	Federal income taxes		-	
	Total Funds Disbursed			\$ 653,627.93
13	Ending Balance (September 30, 2025)			\$ 1,429,443.67
14	Ending Balance of Fund - Net Assets			
14a	Cash & Cash Equivalents		\$ 1,429,443.67	
14b	Investments			
14c	Other Assets or Uncleared Funds			
15	Disbursements for Plan Administration Expenses Not Paid by the Fund			
15a	Plan Development Expenses Not Paid by the Fund			-
15b	Plan Implementation Expenses Not Paid by the Fund			-
15c	Tax Administrator Fees & Bonds Not Paid by the Fund			-
16	Disbursements to Court/Other Not Paid by the Fund			-
16a	Court Registry Investment System (CRIS) or other banking fees related to the Fund			-
16b	Federal income taxes			-
17	DC & State Tax Payments			-
18	No. of Claims			
18a	the number of claims received from investors during this reporting period	0 claims		
18b	the number of claims received from investors as a result of all orders since the inception of the Fund	734 claims		

		Detail	Subtotal	Grand Total
19	No. of Claimants/Investors			
19a	the number of claimants/investors receiving distributions during the reporting period	0 claimants		
19b	the number of claimants/investors receiving distributions pursuant to all orders of distribution since the inception of the	630 claimants		

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, §
§

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

Defendants, §
§

and §
§

DODSON PRAIRIE OIL & GAS LLC; PANTHER §
CITY ENERGY LLC; MURATORE FINANCIAL §
SERVICES, INC.; BRIDY IKEY; ENCYPHER §
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. §
§

**ORDER APPROVING RECEIVER'S FEE APPLICATION FOR SERVICES PERFORMED
BETWEEN OCTOBER 1, 2025 AND DECEMBER 31, 2025, AND BRIEF IN SUPPORT**

Before the Court is the *Fee Application for Services Performed Between October 1, 2025 and December 31, 2025, 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”); Higgs & Johnson (“H&J”); Ahuja & Clark, PLLC n/k/a Ahuja & Consultants, Inc. (“Ahuja”); and Stretto, Inc. (“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, H&J, Ahuja, and Stretto have provided reasonable services at reasonable rates that have benefitted the Receivership Estates during the Application Period; (iv) the relief requested in the Application is in the best interests of the Receivership Estates and all parties-in-interest thereof; (v) proper and adequate notice of the Application has been given and that no other or further notice is necessary; and (vi) the deadline for filing objections to the Application has expired and no objection to the Application was filed with this Court; accordingly,

IT IS HEREBY ORDERED, ADJUDGED, AND DECREED THAT:

1. The Application is **APPROVED** to the extent set forth herein.
2. The Receiver’s fees incurred during the Application Period are approved on an interim basis and allowed in the amount of **\$3,105.00**.

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

3. Dykema's fees incurred during the Application Period are approved on an interim basis and allowed in the amount of **\$27,335.00**.

4. H&J's fees incurred during the Application Period are approved on an interim basis and allowed in the amount of **B\$1,550.00**, in addition to the 10% VAT in the amount of **B\$155.00**.

5. Ahuja's fees incurred during the Application Period are approved on an interim basis and allowed in the amount of **\$9,839.00**.

6. Stretto's fees incurred during the Application Period are approved on an interim basis and allowed in the amount of **\$3,770.50**.

7. 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 **\$6,881.01**.

8. 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), H&J, Ahuja, and Stretto from the available funds of the Receivership Estates.

SO ORDERED.

[_____], 2026.

HAL R. RAY, JR.
UNITED STATES MAGISTRATE JUDGE

Prepared and submitted by:

Danielle Rushing Behrends

State Bar No. 24086961

dbehrends@dykema.com

Dominique A. Douglas

State Bar No. 21434409

ddouglas@dykema.com

DYKEMA GOSSETT PLLC

112 East Pecan Street, Suite 1800

San Antonio, Texas 78205

Telephone: (210) 554-5500

Facsimile: (210) 226-8395

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	4.60 hours	\$675.00	\$3,105.00

Dykema Gossett PLLC

<u>TIMEKEEPER</u>	<u>TITLE</u>	<u>HOURS</u>	<u>HOURLY RATE</u>	<u>TOTAL FEES</u>
Behrends, Danielle Rushing	Member	38.80 hours	\$475.00	\$18,430.00
Douglas, Dominique A.	Associate	25.80 hours	\$330.00	\$8,514.00
Lafuente, Adrianna	Paralegal	0.30 hours	\$230.00	\$69.00

Dykema Gossett PLLC – Bahamas Litigation

<u>TIMEKEEPER</u>	<u>TITLE</u>	<u>HOURS</u>	<u>HOURLY RATE</u>	<u>TOTAL FEES</u>
Behrends, Danielle Rushing	Member	0.40 hours	\$475.00	\$190.00
Douglas, Dominique A.	Associate	0.40 hours	\$330.00	\$160.00

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	1.00 hours	\$325.00	\$325.00
Bremer, Carolyn	0.40 hours	\$325.00	\$130.00
Shetty, Divya	25.80 hours	\$250.00	\$6,450.00
Wallace, Jennifer	16.30 hours	\$180.00	\$2,934.00

Higgs & Johnson

TIMEKEEPER	TITLE	HOURS	HOURLY RATE	TOTAL FEES
Archer-Glasgow, Tara A.	Partner	1.00 hours	B\$800.00	B\$800.00
Major, Ja'Ann M.	Partner	1.25 hours	B\$600.00	B\$750.00

Stretto, Inc.

TIMEKEEPER	HOURS	HOURLY RATE	TOTAL FEE
Alduenda, Jenice	0.50 hours	\$550.00	\$275.00
Cady, Stephen	0.20 hours	\$625.00	\$125.00
Danpongchareon, Pete	2.60 hours	\$475.00	\$1,235.00
McElhinney, Dan	1.20 hours	\$210.00	\$252.00
Moreau, Ryan	0.30 hours	\$475.00	\$142.50
Saraceni, Robert	8.40 hours	\$195.00	\$1,638.00
Soper, Brian	0.30 hours	\$210.00	\$63.00
Tondreault, Laura	0.80 hours	\$50.00	\$40.00

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

<u>Category Description</u>	<u>Total Billable Amount</u>	<u>Total Billable Time</u>
Asset Disposition	\$810.00	1.20 hours
Business Operations	\$1,147.50	1.70 hours
Tax Issues	\$337.50	0.50 hours
Status Reports	\$810.00	1.20 hours
TOTAL	\$3,105.00	4.60 hours

Dykema Gossett PLLC

<u>Category Description</u>	<u>Total Billable Amount</u>	<u>Total Billable Time</u>
Case Administration ⁹	\$4,145.50	10.90 hours
Asset Analysis and Recovery	\$997.50	2.10 hours
Asset Disposition	\$6,218.50	15.90 hours
Business Operations	\$5,997.00	12.90 hours
Tax Issues	\$4,370.00	8.00 hours
Claims Administration and Objection	\$794.50	2.10 hours
Accounting/Auditing	\$132.00	0.40 hours
Data Analysis	\$95.00	0.20 hours
Status Reports	\$4,025.50	11.1 hours
Litigation Consulting	\$237.50	0.50 hours
SUBTOTAL	\$27,013.00	65.30 hours
Litigation Consulting – Bahamas Litigation	\$322.00	0.80 hours
SUBTOTAL	\$322.00	0.80 hours
TOTAL	\$27,335.00	66.10 hours

⁹ Calls from investors were often about the distribution 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.”

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	\$9,709.00	43.10 hours
Advisory Services	\$130.00	0.40 hours
TOTAL	\$9,839.00	43.50 hours

Higgs & Johnson

<u>Category Description</u>	<u>Total Billable Amount</u>	<u>Total Billable Time</u>
Litigation Consulting	B\$1,550.00	2.25 hours
SUBTOTAL	B\$1,550.00	2.25 hours
10% VAT	B\$155.00	
TOTAL	B\$1,705.00¹⁰	

Stretto, Inc.

<u>Category Description</u>	<u>Total Billable Amount</u>	<u>Total Billable Time</u>
Case Administration	\$3,770.50	14.30 hours
TOTAL	\$3,770.50	14.30 hours

¹⁰ The total compensation (fees, expenses, and 10% VAT) requested by H&J during this Application Period is B\$1,705.00.

EXHIBIT E-1



777 Woodward Avenue, Suite 400 • Detroit, MI 48226 • EIN# 38-1446628

DUE UPON RECEIPT

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

FEBRUARY 11, 2026
MATTER #: 122686.000001
INVOICE #: 3700770

FOR PROFESSIONAL SERVICES RENDERED

RE: RECEIVER'S TIME

FEES	\$	810.00
INVOICE TOTAL	\$	810.00



DEBORAH D WILLIAMSON
DEBORAH WILLIAMSON

MATTER #: 122686.000001
INVOICE #: 3700770
PAGE 2

FEBRUARY 11, 2026

RE: RECEIVER'S TIME

DATE	ID	DESCRIPTION	HOURS
10/27/25	DDW	REVIEW AND REVISE QUARTERLY OPERATING REPORT; CONFERENCE REGARDING SAME.	0.90
10/29/25	DDW	CONFERENCE REGARDING QUARTERLY REPORT.	0.30
		TOTAL HOURS	1.20
		TOTAL	\$810.00



DEBORAH D WILLIAMSON
DEBORAH WILLIAMSON

MATTER #: 122686.000001
INVOICE #: 3700770
PAGE 3

FEBRUARY 11, 2026

BILLING SUMMARY

ID	TIMEKEEPER	HOURS	RATES	AMOUNT
DDW	DEBORAH WILLIAMSON	1.20	675.00	810.00
	TOTAL	1.20		\$810.00



DEBORAH D WILLIAMSON
DEBORAH WILLIAMSON

FEBRUARY 11, 2026

MATTER #: 122686.000001
INVOICE #: 3700770
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TASK SUMMARY

TASK	TASK DESCRIPTION	HOURS	AMOUNT
BT155	STATUS REPORTS	1.20	810.00
	TOTAL	1.20	810.00



777 Woodward Avenue, Suite 400 • Detroit, MI 48226 • EIN# 38-1446628

DUE UPON RECEIPT

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

FEBRUARY 11, 2026
MATTER #: 122686.000001
INVOICE #: 3707053

FOR PROFESSIONAL SERVICES RENDERED

RE: RECEIVER'S TIME

FEES	\$	2,700.00
INVOICE TOTAL	\$	2,700.00



DEBORAH D WILLIAMSON
DEBORAH WILLIAMSON

MATTER #: 122686.000001
INVOICE #: 3707053
PAGE 2

FEBRUARY 11, 2026

RE: RECEIVER'S TIME

DATE	ID	DESCRIPTION	HOURS
11/04/25	DDW	CONFERENCE WITH PWC REGARDING BAHAMAS PROPERTIES INCLUDING REPAIRS, INSURANCE AND POTENTIAL SALE PROCESS.	0.70
11/10/25	DDW	REVIEW AND REVISE PROPOSED MOTION AND ORDER RELATED TO SALES PROCEDURES FOR BAHAMAS PROPERTIES.	0.80
11/13/25	DDW	REVIEW AND REVISE PLEADINGS REGARDING BAHAMAS SALE PROCEDURES; CONFERENCE WITH MS. DOUGLAS REGARDING EXHIBITS AND RELATED PLEADINGS IN OTHER CASES.	0.90
11/17/25	DDW	REVISE PLEADINGS REGARDING BAHAMAS SALE PROCESS; CONFERENCE AND EMAILS REGARDING SAME.	0.90
11/19/25	DDW	FINAL REVIEW OF BAHAMAS SALE PROCESS PLEADINGS.	0.70
TOTAL HOURS			4.00
TOTAL			\$2,700.00



DEBORAH D WILLIAMSON
DEBORAH WILLIAMSON

MATTER #: 122686.000001
INVOICE #: 3707053
PAGE 3

FEBRUARY 11, 2026

BILLING SUMMARY

ID	TIMEKEEPER	HOURS	RATES	AMOUNT
DDW	DEBORAH WILLIAMSON	4.00	675.00	2,700.00
	TOTAL	4.00		\$2,700.00



DEBORAH D WILLIAMSON
DEBORAH WILLIAMSON

FEBRUARY 11, 2026

MATTER #: 122686.000001
INVOICE #: 3707053
PAGE 4

TASK SUMMARY

TASK	TASK DESCRIPTION	HOURS	AMOUNT
B130	ASSET DISPOSITION	4.00	2,700.00
	TOTAL	4.00	2,700.00



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DUE UPON RECEIPT

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

FEBRUARY 11, 2026
MATTER #: 122686.000001
INVOICE #: 3714345

FOR PROFESSIONAL SERVICES RENDERED

RE: RECEIVER'S TIME

FEES	\$	2,295.00
INVOICE TOTAL	\$	2,295.00



DEBORAH D WILLIAMSON
DEBORAH WILLIAMSON

MATTER #: 122686.000001
INVOICE #: 3714345
PAGE 2

FEBRUARY 11, 2026

RE: RECEIVER'S TIME

DATE	ID	DESCRIPTION	HOURS
12/03/25	DDW	PREPARE FOR AND ATTEND HEARING ON MOTION TO APPROVE SALE PROCEDURES FOR BAHAMAS PROPERTY; APPROVE TRANSFER OF FUNDS.	0.60
12/04/25	DDW	REVIEW AND APPROVE PAYMENTS INCLUDING CONFERENCE WITH BANK REGARDING WIRE TRANSFERS.	0.40
12/09/25	DDW	REVIEW AND EXECUTE VARIOUS DOCUMENTS REGARDING CREATION OF BANK ACCOUNT IN BAHAMAS; REVIEW AND RESPOND TO EMAILS REGARDING REQUIREMENTS.	0.70
12/18/25	DDW	PREPARE FOR AND ATTEND CONFERENCE REGARDING SALE PROCESS FOR BAHAMAS PROPERTY.	0.60
12/18/25	DDW	REVIEW AND RESPOND TO AHUJA & CONSULTANTS REGARDING PAYMENTS TO HIGGS & JOHNSON.	0.40
12/19/25	DDW	COMMUNICATIONS REGARDING TREATMENT OF PAYMENTS TO NON-US CREDITORS FOR PURPOSES OF TAXES.	0.50
12/22/25	DDW	AUTHORIZE PAYMENTS.	0.20
TOTAL HOURS			3.40
TOTAL			\$2,295.00



DEBORAH D WILLIAMSON
DEBORAH WILLIAMSON

MATTER #: 122686.000001
INVOICE #: 3714345
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FEBRUARY 11, 2026

BILLING SUMMARY

ID	TIMEKEEPER	HOURS	RATES	AMOUNT
DDW	DEBORAH WILLIAMSON	3.40	675.00	2,295.00
	TOTAL	3.40		\$2,295.00



DEBORAH D WILLIAMSON
DEBORAH WILLIAMSON

FEBRUARY 11, 2026

MATTER #: 122686.000001
INVOICE #: 3714345
PAGE 4

TASK SUMMARY

TASK	TASK DESCRIPTION	HOURS	AMOUNT
B130	ASSET DISPOSITION	1.20	810.00
B210	BUSINESS OPERATIONS	1.70	1,147.50
B240	TAX ISSUES	0.50	337.50
TOTAL		3.40	2,295.00



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DUE UPON RECEIPT

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

FEBRUARY 11, 2026
MATTER #: 122686.000002
INVOICE #: 3700771

FOR PROFESSIONAL SERVICES RENDERED

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

FEES	\$	10,875.50
DISBURSEMENTS		3,397.61
INVOICE TOTAL	\$	14,273.11



DEBORAH D WILLIAMSON
DEBORAH WILLIAMSON

MATTER #: 122686.000002
INVOICE #: 3700771
PAGE 2

FEBRUARY 11, 2026

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

DATE	ID	DESCRIPTION	HOURS
10/01/25	DNR	RECEIVE AND REVIEW FARMEE UPDATE; SEND TO OIL AND GAS COUNSEL.	0.40
10/01/25	DADO	CONTINUE DRAFTING MOTION TO APPROVE PROCEDURES FOR SALE OF BAHAMAS PROPERTIES; CONFERENCE WITH DANIELLE RUSHING BEHREND'S REGARDING DRAFT OF THE SAME.	1.50
10/02/25	DNR	CORRESPONDENCE WITH DOJ TAX COUNSEL AND IRS CONTACT REGARDING CONFIRMATION OF POSTING OF PAYMENT FROM RECEIVER DESPITE IRS LETTER TO CONTRARY; CALL WITH IRS APPEALS AGENT REGARDING COLLECTION DUE PROCESS APPEAL REQUEST AND SUBSEQUENT SETTLEMENT AGREEMENT WITH IRS THROUGH DOJ TAX COUNSEL.	0.40
10/02/25	DNR	RECEIVE AND REVIEW IBC BANK STATEMENT AND WAB STATEMENTS FOR SEPTEMBER 2025; SEND TO AHUJA & CONSULTANTS; CORRESPONDENCE TO PWC REGARDING INSURANCE FOR BAHAMAS HOMES.	0.50
10/02/25	DNR	REVIEW AND RESPOND TO DECEASED INVESTOR'S COUNSEL INQUIRIES.	0.30
10/02/25	DADO	COMPLETE DRAFT OF MOTION TO APPROVE SALE PROCEDURES FOR BAHAMAS PROPERTIES; SHORT CONFERENCE WITH DANIELLE RUSHING BEHREND'S REGARDING FINAL DRAFT.	1.90
10/06/25	DADO	REVIEW AND RESPOND TO INVESTOR INQUIRIES.	0.20
10/07/25	DNR	CORRESPONDENCE WITH AHUJA & CONSULTANTS REGARDING INSURANCE PAYMENT.	0.30
10/07/25	DADO	PHONE CONFERENCE WITH INVESTOR'S DAUGHTER REGARDING DEATH OF INVESTOR AND FUTURE DISTRIBUTIONS; EMAIL CORRESPONDENCE WITH THE SAME AND INVESTOR'S ESTATE ATTORNEY AND REVIEW OF DOCUMENTS REGARDING DEATH; EMAIL CORRESPONDENCE WITH STRETTO REGARDING CHANGE OF INVESTOR CONTACT INFORMATION.	0.60
10/09/25	DNR	REVIEW AND PROCESS RECEIVER'S MAIL.	0.20
10/13/25	DNR	PREPARE AND SEND TWO RESPONSE PACKAGES TO QUANAH ISD/CITY OF QUANAH AND HARDEMAN COUNTY TAX OFFICE REGARDING 2025 TAX STATEMENTS AND ABANDONED INTERESTS PER COURT ORDER.	0.50
10/13/25	DNR	RECEIVE AND REVIEW ACCOUNT ANALYSIS STATEMENT FROM IBC BANK FOR SEPTEMBER AND SEND TO AHUJA & CONSULTANTS; REVIEW AND PROCESS RECEIVER'S MAIL.	0.50
10/13/25	DADO	REVIEW AND RESPOND TO INVESTOR INQUIRIES.	0.50
10/14/25	DNR	RECEIVE AND PROCESS RECEIVER'S MAIL.	0.30
10/14/25	DADO	REVIEW AND RESPOND TO INVESTOR INQUIRIES.	0.40



DEBORAH D WILLIAMSON
DEBORAH WILLIAMSON

MATTER #: 122686.000002
INVOICE #: 3700771
PAGE 3

FEBRUARY 11, 2026

DATE	ID	DESCRIPTION	HOURS
10/15/25	DNR	CORRESPONDENCE WITH AHUJA & CONSULTANTS REGARDING QUESTIONS ON BANK STATEMENT AND DEPOSITS; RECEIVE AND PROCESS RECEIVER'S MAIL.	0.40
10/15/25	DNR	REVIEW LETTER FROM IRS REGARDING COLLECTION DUE PROCESS SUBMISSION FROM MARCH 2025; REVIEW NOTICE OF APPEALS HEARING BEFORE IRS APPEALS OFFICER ON DECEMBER 4, 2025.	0.40
10/15/25	DNR	REVISE AFFIDAVIT OF RECEIVER FOR FILING IN BAHAMAS TO CONFORM WITH TEXAS APOSTILLE REQUIREMENTS; DISCUSS SAME WITH RECEIVER.	0.50
10/15/25	DNR	REVIEW AND RESPOND TO INVESTOR INQUIRIES.	0.20
10/20/25	DNR	CORRESPONDENCE WITH OIL AND GAS VENDOR REGARDING DOCUMENTATION NOT PROCESSED BY RRC; DISCUSS SAME WITH RECEIVER; CORRESPONDENCE WITH INVESTOR REGARDING TAX DOCUMENTATION AND PREVIOUS SUBMISSION BY RECEIVER.	0.50
10/20/25	DNR	PREPARE AND SEND CORRESPONDENCE TO IRS REVENUE OFFICER AND IRS APPEALS OFFICER REGARDING COLLECTION DUE PROCESS HEARING ON DECEMBER 4, 2025, AND COURT ENTRY OF AGREED ORDER RESOLVING IRS ISSUES FOR BARRON PETROLEUM.	0.80
10/21/25	DNR	CALL WITH RRC REPRESENTATIVE REGARDING AMOUNTS ALLEGEDLY OWED IN CONNECTION WITH PALO PINTO BOND COMPANY; CORRESPONDENCE TO OAG COUNSEL REGARDING SAME.	0.30
10/21/25	DNR	RECEIVE AND PROCESS RECEIVER'S MAIL; PREPARE AND SEND SECOND RESPONSE LETTER TO WELLS FARGO REGARDING RECEIVERSHIP ORDER AND PROHIBITION OF COLLECTION ATTEMPTS.	0.60
10/21/25	DADO	BEGIN DRAFTING 3Q2025 QUARTERLY REPORT AND REVIEW OF DOCUMENTS TO ASSIST IN DRAFTING THE SAME.	1.00
10/23/25	DNR	REVIEW AND PROCESS RECEIVER'S MAIL; CORRESPONDENCE TO PWC REGARDING UPDATE CALL REQUEST.	0.40
10/23/25	DNR	PREPARE AND SEND PACKAGE TO WICHITA CAD REGARDING 2025 TAX STATEMENTS RECEIVED AND NOTICE OF ABANDONMENT OF PROPERTIES; CORRESPONDENCE TO IRS CONTACT AND DOJ TAX COUNSEL REGARDING IRS NOTICES OF INTENT TO SEIZE OR LEVY PROPERTY REGARDING AOS AND SETTLEMENT ISSUES; DRAFT AND SEND 2 RESPONSE PACKAGES TO IRS REGARDING SAME AND PROOF OF SETTLEMENT PAYMENT.	1.20
10/23/25	DADO	CONTINUE DRAFTING 3Q2025 QUARTERLY REPORT.	4.00
10/23/25	DADO	REVISIONS TO SALE PROCEDURES MOTION AND PROPOSED ORDER.	0.50
10/23/25	DADO	DRAFT AND FINALIZE NOTICE OF TERMINATION FOR HEARTLAND DRILLING FUND I.	0.60
10/24/25	DNR	CORRESPONDENCE WITH AHUJA & CONSULTANTS REGARDING QUARTERLY REPORT EXHIBIT AND REVIEW OF SAME WITH COMMENTS.	0.40



DEBORAH D WILLIAMSON
DEBORAH WILLIAMSON

MATTER #: 122686.000002
INVOICE #: 3700771
PAGE 4

FEBRUARY 11, 2026

DATE	ID	DESCRIPTION	HOURS
10/24/25	DADO	FINAL REVISIONS TO THE 3Q2025 QUARTERLY REPORT; EMAIL CORRESPONDENCE WITH STRETTO REGARDING 3Q2025 QUARTERLY REPORT.	1.00
10/27/25	DNR	CORRESPONDENCE WITH PWC REGARDING CALL ON BAHAMAS PROPERTIES AND NEXT STEPS.	0.20
10/27/25	DNR	CORRESPONDENCE WITH SEC COUNSEL REGARDING SHUTDOWN COMMUNICATIONS PROTOCOL AND CONFERENCE CONTACTS.	0.20
10/27/25	DNR	RECEIVE AND REVIEW REVISED QUARTERLY REPORT EXHIBITS.	0.40
10/27/25	DNR	RECEIVE AND PROCESS RECEIVER'S MAIL.	0.20
10/27/25	DADO	REVISIONS TO 3Q2025 QUARTERLY REPORT BASED ON MS. WILLIAMSON'S COMMENTS.	1.70
10/28/25	DADO	REVISIONS TO SFAR PROVIDED BY AHUJA & CONSULTANTS.	0.20
10/29/25	DNR	CORRESPONDENCE WITH PWC AND RECEIVER REGARDING CALL TO DISCUSS BAHAMAS PROPERTIES AND NEXT STEPS FOR JOINT RECEIVER CONVEYANCE.	0.20
10/29/25	DNR	RECEIVE AND PROCESS RECEIVER'S MAIL.	0.20
10/29/25	DNR	REVISE AND CONTINUE DRAFTING 3Q25 QUARTERLY REPORT.	1.30
10/30/25	DNR	CONTINUE DRAFTING AND FINALIZE 3Q25 QUARTERLY REPORT.	0.40
10/30/25	DNR	DRAFT AND SEND PACKAGE TO SUTTON CAD IN RESPONSE TO TAX STATEMENTS FOR BARRON PETROLEUM.	0.30
10/31/25	DNR	CORRESPONDENCE WITH OAG COUNSEL FOR RRC REGARDING PIPELINE INQUIRY AND CONTINUED CALLS FROM RRC PIPELINE INSPECTOR.	0.40
10/31/25	DNR	RECEIVE AND PROCESS RECEIVER'S MAIL.	0.20
TOTAL HOURS			27.20
TOTAL			\$10,875.50



DEBORAH D WILLIAMSON
DEBORAH WILLIAMSON

MATTER #: 122686.000002
INVOICE #: 3700771
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FEBRUARY 11, 2026

BILLING SUMMARY

ID	TIMEKEEPER	HOURS	RATES	AMOUNT
DNR	DANIELLE R. BEHRENDTS	13.10	475.00	6,222.50
DADO	DOMINIQUE A. DOUGLAS	14.10	330.00	4,653.00
	TOTAL	27.20		\$10,875.50



DEBORAH D WILLIAMSON
DEBORAH WILLIAMSON

MATTER #: 122686.000002
INVOICE #: 3700771
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FEBRUARY 11, 2026

DISBURSEMENTS

DATE	DESCRIPTION	AMOUNT
	FEDERAL EXPRESS/DELIVERY	24.01
	PHOTOCOPIES	8.30
	PRINTING EXPENSES	27.20
	RELATIVITY DATA HOSTING	3,320.00
	SCANNING	18.10
	TOTAL DISBURSEMENTS	3,397.61



DEBORAH D WILLIAMSON
DEBORAH WILLIAMSON

FEBRUARY 11, 2026

MATTER #: 122686.000002
INVOICE #: 3700771
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TASK SUMMARY

TASK	TASK DESCRIPTION	HOURS	AMOUNT
B110	CASE ADMINISTRATION	2.40	1,067.50
B120	ASSET ANALYSIS AND RECOVERY	0.40	190.00
B130	ASSET DISPOSITION	3.90	1,287.00
B210	BUSINESS OPERATIONS	4.80	2,193.00
B240	TAX ISSUES	3.60	1,710.00
B310	CLAIMS ADMINISTRATION & OBJECT	1.20	396.00
BT155	STATUS REPORTS	10.40	3,794.50
BT160	LITIGATION CONSULTING	0.50	237.50
TOTAL		27.20	10,875.50



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DUE UPON RECEIPT

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

FEBRUARY 11, 2026
MATTER #: 122686.000002
INVOICE #: 3707052

FOR PROFESSIONAL SERVICES RENDERED

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

FEES	\$	7,429.50
DISBURSEMENTS		1,679.70
INVOICE TOTAL	\$	9,109.20



DEBORAH D WILLIAMSON
DEBORAH WILLIAMSON

MATTER #: 122686.000002
INVOICE #: 3707052
PAGE 2

FEBRUARY 11, 2026

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

DATE	ID	DESCRIPTION	HOURS
11/03/25	DNR	RECEIVE AND PROCESS RECEIVER'S MAIL; RECEIVE AND REVIEW FARMEE'S UPDATE TO RECEIVER REGARDING FARMOUT; RECEIVE AND REVIEW IBC BANK STATEMENT FOR OCTOBER 2025 AND SEND TO AHUJA & CONSULTANTS; RECEIVE AND REVIEW WAB STATEMENTS FOR OCTOBER 2025 AND SEND AHUJA & CONSULTANTS.	1.40
11/03/25	DNR	CORRESPONDENCE TO AHUJA & CONSULTANTS REGARDING IRS MAIL RECEIVED REGARDING PERSONAL INJURY CLAIMANT'S FORM 1099.	0.10
11/03/25	DADO	REVIEW AND RESPOND TO INVESTOR INQUIRIES.	0.20
11/04/25	DNR	CORRESPONDENCE WITH AHUJA & CONSULTANTS REGARDING IRS MAIL RECEIVED REGARDING 1099 TO JOHN ROGERS; DRAFT AND SEND LETTER TO YOUNG CAD REGARDING ABANDONMENT AND TAX STATEMENT RESPONSE; CORRESPONDENCE WITH STRETTO REGARDING FORM 1099 ISSUED TO CREDITOR; REVIEW SAME AND SEND TO AHUJA & CONSULTANTS.	0.90
11/04/25	DNR	CALL WITH PWC AND RECEIVER REGARDING BAHAMAS PROPERTIES, VALUATION, PROPERTY TAXES, AND ISSUES REGARDING APPRAISAL AND DEED TRANSFER.	0.70
11/04/25	DADO	REVIEW AND RESPOND TO INVESTOR INQUIRIES.	0.20
11/05/25	DNR	CORRESPONDENCE WITH AHUJA & CONSULTANTS REGARDING 1099 TO PERSONAL INJURY CLAIMANT AND RESPONSE TO IRS MAIL ON SAME.	0.20
11/07/25	DADO	REVIEW AND RESPOND TO INVESTOR INQUIRY.	0.40
11/10/25	DADO	EMAIL CORRESPONDENCE WITH HIGGS & JOHNSON REGARDING FEE APPLICATION; REVIEW OF DOCUMENTS ATTACHED TO CORRESPONDENCE RECEIVED FROM HIGGS & JOHNSON AND COMPARE THE SAME TO PREVIOUS EMAIL CORRESPONDENCE RECEIVED; CORRESPONDENCE WITH MS. BEHREND'S REGARDING INCONSISTENCIES BETWEEN HIGGS & JOHNSON CURRENT EMAIL AND PREVIOUS INVOICES.	0.80
11/10/25	DNR	DRAFT AND SEND SECOND DEMAND LETTER TO RAMIRO LEMUS VILLEDA.	0.40
11/10/25	DNR	CORRESPONDENCE WITH AHUJA & CONSULTANTS REGARDING DISTRIBUTION RECONCILIATION.	0.20
11/10/25	DNR	CORRESPONDENCE WITH LITIGATION SUPPORT TEAM REGARDING RELATIVITY DATABASE.	0.20
11/10/25	LHT1	COMMUNICATE WITH CASE TEAM PER DANIELLE BEHREND'S REGARDING DATA DISPOSITION OPTIONS FOR REVIEW WORKSPACE.	0.10
11/10/25	LHT1	COMMUNICATE WITH CASE TEAM PER DANIELLE BEHREND'S REGARDING	0.30



DEBORAH D WILLIAMSON
DEBORAH WILLIAMSON

MATTER #: 122686.000002
INVOICE #: 3707052
PAGE 3

FEBRUARY 11, 2026

DATE	ID	DESCRIPTION	HOURS
		REVIEW WORKSPACE DATA DISPOSITION OPTIONS.	
11/10/25	DADO	REVIEW REQUIRED DOCUMENTS TO RESPOND TO EMAIL CORRESPONDENCE WITH AHUJA & CONSULTANTS REGARDING DISTRIBUTIONS TO SPECIFIC INVESTORS BENEFICIARIES AND RESPONSE TO THE SAME.	0.40
11/10/25	DADO	CONFERENCE WITH MS. WILLIAMSON REGARDING SALE PROCEDURES MOTION AND MINOR REVISIONS TO THE SAME.	0.30
11/11/25	DADO	REVISE 3Q2025 QUARTERLY REPORT.	0.70
11/11/25	DADO	REVISIONS TO THE SALE PROCEDURES FOR THE BAHAMAS PROPERTIES.	0.50
11/11/25	DADO	REVISE MOTION TO APPROVE SALE PROCEDURES FOR THE BAHAMAS PROPERTIES.	0.80
11/12/25	DADO	ADDITIONAL REVISIONS TO THE SALE PROCEDURES MOTION FOR THE BAHAMAS PROPERTIES.	0.90
11/13/25	DNR	RECEIVE AND REVIEW ACCOUNT ANALYSIS STATEMENT FOR IBC BANK; SEND TO AHUJA & CONSULTANTS.	0.20
11/13/25	DADO	REVISE BAHAMAS SALE MOTION AND REVIEW MS. WILLIAMSON'S REVISIONS TO THE SAME; PULL PLEADING TO USE AS AN EXHIBIT TO THE SAME.	1.00
11/17/25	DNR	CORRESPONDENCE WITH DOJ TAX COUNSEL REGARDING IRS APPEAL HEARING ON DECEMBER 4, 2025 AND NOTICES RECEIVED REGARDING OUTSTANDING BALANCES ALREADY PAID PURSUANT TO SETTLEMENT.	0.40
11/17/25	DNR	REVIEW CORRESPONDENCE FROM SEC COUNSEL REGARDING MOTION FOR SALE PROCEDURES OF BAHAMAS PROPERTIES.	0.10
11/17/25	DADO	EMAIL CORRESPONDENCE WITH PWC, HIGGS & JOHNSON AND THE COMMISSION REGARDING REVIEW OF BAHAMAS SALE PROCEDURES MOTION.	0.20
11/18/25	DNR	RECEIVE AND PROCESS RECEIVER'S MAIL.	0.20
11/18/25	DNR	REVISE MOTION FOR APPROVAL OF BAHAMAS PROPERTIES' SALE PROCEDURES AND PROPOSED ORDER THERETO; CORRESPONDENCE TO RECEIVER REGARDING SAME.	1.30
11/19/25	DNR	RECEIVE AND REVIEW COMMENTS FROM HIGGS & JOHNSON TO BAHAMAS REAL ESTATE SALE PROCEDURES MOTION; CORRESPONDENCE WITH HIGGS & JOHNSON AND PWC REGARDING OUTSTANDING STAMPING, RECORDING, AND TAX ISSUES ON BAHAMAS PROPERTIES; CORRESPONDENCE WITH RECEIVER REGARDING COMMENTS TO BAHAMAS REAL ESTATE SALE PROCEDURES MOTION; CONTINUE DRAFTING SAME; RECEIVE AND REVIEW 2026 TAX CERTIFICATES FOR BOTH PROPERTIES; CALL WITH COURTROOM DEPUTY REGARDING COURT AVAILABILITY FOR HEARING ON BAHAMAS PROPERTIES REAL ESTATE SALE PROCEDURES MOTION; REVIEW ORDER SETTING HEARING ON DECEMBER 3, 2025; PREPARE NOTICE OF HEARING FOR SAME.	2.20
11/19/25	DADO	REVIEW HIGGS & JOHNSON'S COMMENTS TO THE BAHAMAS PROPERTIES SALE	1.60



DEBORAH D WILLIAMSON
DEBORAH WILLIAMSON

MATTER #: 122686.000002
INVOICE #: 3707052
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FEBRUARY 11, 2026

DATE	ID	DESCRIPTION	HOURS
MOTION; EMAIL CORRESPONDENCE WITH MS. RUSHING BEHREND'S REGARDING THE SAME; SHORT CONFERENCE WITH MS. WILLIAMSON REGARDING REVIEW OF HIGGS & JOHNSON'S COMMENTS; REVISIONS TO BAHAMAS PROPERTIES SALE MOTION BASED ON MS. WILLIAMSON AND HIGGS & JOHNSON'S COMMENTS; EMAIL CORRESPONDENCE TO MS. RUSHING BEHREND'S REGARDING UPDATED DRAFT; FINALIZATION OF THE SAME.			
11/19/25	DADO	REVIEW AND RESPOND TO INVESTOR INQUIRY.	0.40
11/19/25	ALAF	ATTEND TO INVESTOR INQUIRIES.	0.20
11/20/25	DNR	CORRESPONDENCE WITH PWC REGARDING BAHAMIAN BANK FORMS; REVIEW SAME.	0.40
11/21/25	DNR	RECEIVE AND PROCESS RECEIVER'S MAIL; CORRESPONDENCE WITH RUSTIN BRUNSON REGARDING CALL FROM WELLS FARGO.	0.60
11/23/25	DADO	DRAFT AND FINALIZE CERTIFICATE OF NO OBJECTION FOR HEARTLAND DRILLING FUND, I L.P.	0.30
TOTAL HOURS			18.80
TOTAL			\$7,429.50



DEBORAH D WILLIAMSON
DEBORAH WILLIAMSON

MATTER #: 122686.000002
INVOICE #: 3707052
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FEBRUARY 11, 2026

BILLING SUMMARY

ID	TIMEKEEPER	HOURS	RATES	AMOUNT
DNR	DANIELLE R. BEHRENDTS	9.50	475.00	4,512.50
DADO	DOMINIQUE A. DOUGLAS	8.70	330.00	2,871.00
ALAF	ADRIANNA LAFUENTE	0.20	230.00	46.00
LHT1	LOURDILYNN TUBALINAL	H. 0.40	0.00	0.00
	TOTAL	18.80		\$7,429.50



DEBORAH D WILLIAMSON
DEBORAH WILLIAMSON

FEBRUARY 11, 2026

MATTER #: 122686.000002
INVOICE #: 3707052
PAGE 6

DISBURSEMENTS

DATE	DESCRIPTION	AMOUNT
	PHOTOCOPIES	4.90
	PRINTING EXPENSES	9.90
	RELATIVITY DATA HOSTING	1,660.00
	SCANNING	4.90
	TOTAL DISBURSEMENTS	1,679.70



DEBORAH D WILLIAMSON
DEBORAH WILLIAMSON

FEBRUARY 11, 2026

MATTER #: 122686.000002
INVOICE #: 3707052
PAGE 7

TASK SUMMARY

TASK	TASK DESCRIPTION	HOURS	AMOUNT
B110	CASE ADMINISTRATION	2.60	706.00
B120	ASSET ANALYSIS AND RECOVERY	1.10	522.50
B130	ASSET DISPOSITION	9.10	3,554.00
B210	BUSINESS OPERATIONS	3.10	1,429.00
B240	TAX ISSUES	1.60	760.00
BT120	ACCOUNTING/AUDITING	0.40	132.00
BT150	DATA ANALYSIS	0.20	95.00
BT155	STATUS REPORTS	0.70	231.00
TOTAL		18.80	7,429.50



777 Woodward Avenue, Suite 400 • Detroit, MI 48226 • EIN# 38-1446628

DUE UPON RECEIPT

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

FEBRUARY 11, 2026
MATTER #: 122686.000002
INVOICE #: 3714344

FOR PROFESSIONAL SERVICES RENDERED

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

FEES	\$	8,708.00
DISBURSEMENTS		1,803.70
INVOICE TOTAL	\$	10,511.70



DEBORAH D WILLIAMSON
DEBORAH WILLIAMSON

MATTER #: 122686.000002
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FEBRUARY 11, 2026

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

DATE	ID	DESCRIPTION	HOURS
12/01/25	DNR	RECEIVE AND REVIEW IBC BANK STATEMENT FOR NOVEMBER 2025; SEND TO AHUJA & CONSULTANTS; CORRESPONDENCE WITH PWC REGARDING BAHAMIAN BANK ACCOUNT FORMS; RECEIVE AND REVIEW WAB BANK STATEMENTS FOR NOVEMBER 2025; SEND TO AHUJA & CONSULTANTS; RECEIVE AND PROCESS RECEIVER'S MAIL; RECEIVE AND REVIEW UPDATE FROM FARMEE; SEND UPDATE TO SEC COUNSEL REGARDING SAME.	1.00
12/01/25	DNR	CALL WITH LANDOWNER REGARDING QUESTIONS ON PALO PINTO COUNTY LEASES OF PANTHER CITY ENERGY AND DISCUSSION OF COURT-APPROVED ABANDONMENT AS OF OCTOBER 2023.	0.20
12/01/25	DADO	REVIEW AND RESPOND TO INVESTOR INQUIRY.	0.90
12/02/25	ALAF	ATTEND TO INVESTOR INQUIRIES.	0.10
12/02/25	DNR	CALL WITH IRS APPEALS OFFICER REGARDING APPEAL HEARING OF RECEIVER ON DECEMBER 4, 2025 AND SETTLEMENT ORDER COMPLIANCE; CORRESPONDENCE WITH DOJ TAX COUNSEL REGARDING UPDATE ON SAME AND REQUEST FOR IRS WITHDRAWAL OF NOTICE OF LEVY REGARDING BARRON PETROLEUM.	0.30
12/02/25	DNR	CORRESPONDENCE TO LANDOWNER COUNSEL REGARDING ABANDONMENT OF OIL AND GAS PROPERTIES AND RECEIVERSHIP CASE.	0.10
12/03/25	DNR	PREPARE FOR AND APPEAR BEFORE THE HON. HAL R. RAY, JR. ON BAHAMAS REAL PROPERTY SALE PROCEDURES MOTION AND 3Q25 AMENDED FEE APPLICATION; REVIEW ORDER APPROVING REAL PROPERTY SALE PROCEDURES FOR BAHAMAS PROPERTIES; CORRESPONDENCE TO PWC AND HIGGS & JOHNSON REGARDING SAME AND CALL WITH PWC ON NEXT STEPS FOR BROKER SELECTION AND PROPERTY REPAIRS.	1.30
12/03/25	DNR	PREPARE AND SEND PACKAGE TO WICHITA CAD REGARDING ABANDONMENT OF PROPERTIES AND TAX STATEMENT RESPONSE FOR LEADING EDGE.	0.40
12/03/25	DNR	RECEIVE AND PROCESS RECEIVER'S MAIL; CORRESPONDENCE WITH WAB REGARDING FUND TRANSFER REQUEST TO IBC BANK OF RECEIVER; DISCUSS FUND TRANSFER WITH RECEIVER; CORRESPONDENCE WITH HIGGS & JOHNSON REGARDING 3Q25 FEES AND PAYMENT OF SAME VIA FOREIGN WIRE; PREPARE FOREIGN WIRE FORMS FOR WAB FOR APPROVAL BY RECEIVER; REVIEW ORDER AUTHORIZING 3Q25 FEES AND EXPENSES FOR RECEIVER'S PROFESSIONALS; PROCESS PAYMENTS WITH RECEIVER.	1.20
12/03/25	DNR	CALL WITH LANDOWNER COUNSEL REGARDING ABANDONMENT OF OIL AND GAS WELL IN PALO PINTO COUNTY; CORRESPONDENCE TO SAME REGARDING NOTICE OF ABANDONMENT.	0.30



DEBORAH D WILLIAMSON
DEBORAH WILLIAMSON

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FEBRUARY 11, 2026

DATE	ID	DESCRIPTION	HOURS
12/03/25	DADO	FINALIZE AMENDED ORDER GRANTING FEE APPLICATION.	0.20
12/04/25	DNR	CORRESPONDENCE WITH WAB REGARDING INTERNATIONAL WIRE TO HIGGS & JOHNSON.	0.30
12/08/25	DNR	REVIEW DOCUMENTATION FOR INVESTOR'S TRANSACTION SCHEDULE AND DISTRIBUTION STATUS AND RESPOND TO INVESTOR INQUIRY ON SAME; REVIEW AND RESPOND TO OTHER INVESTOR INQUIRIES, INCLUDING BAHAMAS SALE STATUS.	0.60
12/08/25	DADO	REVIEW AND RESPOND TO INVESTOR INQUIRY; EMAIL CORRESPONDENCE WITH MS. BEHRENS REGARDING INVESTOR CORRESPONDENCE RECEIVED AND REVIEW OF DRAFT EMAIL TO RESPOND TO THE SAME.	0.70
12/09/25	DNR	REVIEW AND RESPOND TO INVESTOR INQUIRIES.	0.20
12/09/25	DNR	CORRESPONDENCE WITH AHUJA & CONSULTANTS REGARDING W-9S FOR VENDORS; CORRESPONDENCE TO VENDORS REQUESTING W-9S FOR RECEIVERSHIP TAX RETURN PURPOSES; DISCUSS INTERNATIONAL COMPONENT FOR HIGGS & JOHNSON AND FORMS REQUIRED BY IRS FOR SAME TO COMPLETE RECEIVERSHIP TAX RETURNS.	0.80
12/09/25	DNR	REVIEW TRANSACTION SCHEDULE FOR INVESTOR; REQUEST SERVICE INFORMATION FROM STRETTO FOR SAME INVESTOR; REVIEW SUBMISSION OF INVESTOR-SPECIFIC MATERIALS REGARDING CLAIMS AND NOTICING FROM STRETTO.	0.70
12/09/25	DNR	CORRESPONDENCE WITH PWC REGARDING CIBC BANK FORMS FOR BAHAMIAN BANK ACCOUNT FOR RECEIVERSHIP; PREPARE FORMS OF RECEIVER FOR SAME; DISCUSS SAME WITH RECEIVER; ADDRESS QUESTIONS REGARDING ENTITY SELF CERTIFICATION FORM WITH SAME.	1.00
12/09/25	DADO	REVIEW AND RESPOND TO INVESTOR INQUIRIES.	0.50
12/10/25	DNR	ANALYZE DOCUMENTATION FROM STRETTO REGARDING INVESTOR-SPECIFIC CLAIM, NOTICING, AND DISTRIBUTION INFORMATION; PROVIDE DETAILED RESPONSE TO INVESTOR INQUIRY RE CLAIMS, DISTRIBUTION, AND NOTICING.	0.60
12/10/25	DNR	CORRESPONDENCE WITH AHUJA & CONSULTANTS REGARDING TAX DOCUMENTATION RECEIVED FROM HIGGS & JOHNSON AND TAX RETURN REQUIREMENTS FROM SAME FOR RECEIVERSHIP ESTATES.	0.30
12/10/25	DADO	REVIEW AND RESPOND TO INVESTOR INQUIRY.	0.40
12/11/25	DNR	CORRESPONDENCE WITH PWC REGARDING SECOND REQUEST FOR NEXT STEPS CALL FOR BROKER SELECTION AND REPAIR OF BAHAMAS PROPERTIES.	0.20
12/11/25	DNR	RECEIVE AND REVIEW FAX FROM IRS APPEALS OFFICER, INCLUDING WITHDRAWAL FORM FOR APPEALS HEARING PURSUANT TO COURT-APPROVED SETTLEMENT FOR BARRON PETROLEUM; EXECUTE AND REMIT FORM TO APPEALS OFFICER FOR CLOSING OF FILE; CORRESPONDENCE WITH DOJ TAX COUNSEL REGARDING SAME AND CLOSING OF RECEIVERSHIP ESTATE	0.80



DEBORAH D WILLIAMSON
DEBORAH WILLIAMSON

MATTER #: 122686.000002
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FEBRUARY 11, 2026

DATE	ID	DESCRIPTION	HOURS
		TAX ISSUES PER COURT ORDER.	
12/11/25	DNR	CORRESPONDENCE WITH SEC COUNSEL REGARDING CALL REQUEST ON INVESTOR AND FEEDER FUND.	0.20
12/11/25	DADO	REVIEW AND RESPOND TO INVESTOR INQUIRY.	0.30
12/12/25	DNR	CORRESPONDENCE TO AHUJA & CONSULTANTS REGARDING FEEDER FUND INQUIRY AND AMOUNTS RECEIVED ON SAME.	0.10
12/12/25	DNR	CALL WITH SEC COUNSEL REGARDING FEEDER FUND INQUIRY.	0.10
12/15/25	DNR	REVIEW AND RESPOND TO INVESTOR INQUIRIES; CORRESPONDENCE TO SEC COUNSEL REGARDING FEEDER FUND INFORMATION FOR VARIOUS RECEIVERSHIP ESTATES.	0.50
12/15/25	DNR	RECEIVE AND REVIEW IBC BANK ANALYSIS STATEMENT; SEND TO AHUJA & CONSULTANTS; REVIEW AND PROCESS RECEIVER'S MAIL.	0.40
12/15/25	DNR	REVIEW SPREADSHEET OF FEEDER FUND ANALYSIS FROM AHUJA & CONSULTANTS; CORRESPONDENCE WITH AHUJA & CONSULTANTS REGARDING SAME; TELEPHONE CONFERENCE WITH RECEIVER REGARDING ISSUES ON SAME.	0.50
12/16/25	DNR	RECEIVE AND PROCESS MAIL FROM IRS; CALL WITH VARIOUS CAD COUNSEL REGARDING SUBMISSION OF NOTICE OF ABANDONMENT PAPERWORK TO SPECIFIC CAD CONTACT.	0.50
12/17/25	DNR	CORRESPONDENCE WITH PWC AND RECEIVER REGARDING CALL ON NEXT STEPS FOR SALE AND BROKER ITEMS FOR BAHAMAS PROPERTIES.	0.20
12/18/25	DNR	CALL WITH PWC AND RECEIVER REGARDING NEXT STEPS ON REPAIRS, BROKER, AND APPRAISALS FOR BAHAMAS PROPERTIES.	0.80
12/18/25	DNR	CORRESPONDENCE WITH PWC REGARDING CIBC'S NEW BANK ACCOUNT OPENING REQUIREMENTS FOR JOINT RECEIVERS; REVIEW FORM AND DISCUSS "VERIFIER" REQUIREMENT WITH RECEIVER.	0.30
12/19/25	DNR	CORRESPONDENCE WITH AHUJA & CONSULTANTS AND RECEIVER REGARDING VENDORS AND TAX PREPARATION FORMS WITH PENDING ISSUES.	0.40
12/22/25	DNR	CORRESPONDENCE WITH RECEIVER REGARDING CERTIFIED COPIES OF COURT DOCUMENTATION FOR BAHAMAS PROPERTIES.	0.20
12/22/25	DNR	REQUEST DOCUMENTATION FOR BAHAMAS REAL ESTATE COUNSEL FOR REAL ESTATE SALE PROCEDURES.	0.20
12/22/25	DNR	CORRESPONDENCE WITH PWC REGARDING CIBC BANK DOCUMENTATION AND ADDITIONAL FOREIGN INDIVIDUAL REQUIREMENTS OF RECEIVER.	0.40
12/29/25	DNR	REVIEW AND RESPOND TO INVESTOR INQUIRIES.	0.20
12/29/25	DNR	CORRESPONDENCE WITH RECEIVER REGARDING TAX RETURNS FOR 2025 TAX YEAR; CORRESPONDENCE WITH AHUJA & CONSULTANTS REGARDING TAX	0.50



DEBORAH D WILLIAMSON
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MATTER #: 122686.000002
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FEBRUARY 11, 2026

DATE	ID	DESCRIPTION	HOURS
		RETURNS AND PREPARATION TIMING FOR SAME.	
12/29/25	DNR	RECEIVE AND PROCESS RECEIVER'S MAIL.	0.40
		TOTAL HOURS	19.30
		TOTAL	\$8,708.00



DEBORAH D WILLIAMSON
DEBORAH WILLIAMSON

MATTER #: 122686.000002
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FEBRUARY 11, 2026

BILLING SUMMARY

ID	TIMEKEEPER	HOURS	RATES	AMOUNT
DNR	DANIELLE R. BEHRENDTS	16.20	475.00	7,695.00
DADO	DOMINIQUE A. DOUGLAS	3.00	330.00	990.00
ALAF	ADRIANNA LAFUENTE	0.10	230.00	23.00
	TOTAL	19.30		\$8,708.00



DEBORAH D WILLIAMSON
DEBORAH WILLIAMSON

MATTER #: 122686.000002
INVOICE #: 3714344
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FEBRUARY 11, 2026

DISBURSEMENTS

DATE	DESCRIPTION	AMOUNT
12/01/25	VENDOR: CORPORATE FILINGS LLC INVOICE#: 38HC9EH4 DATE: 11/7/2025 - CORPORATE FILINGS LLC - INV#: 38HC9EH4 - CORPORATE FILINGS LLC- INV#:38HC9EH4, 11/07/25, CALIFORNIA REGISTERED AGENT SERVICE	49.00
12/01/25	VENDOR: CORPORATE FILINGS LLC INVOICE#: BDBA2Z DATE: 10/10/2025 - CORPORATE FILINGS LLC - INV#: BDBA2Z - CORPORATE FILINGS LLC- INV#:BDBA2Z, 10/10/25, DELAWARE REGISTERED AGENT SERVICE	49.00
	PHOTOCOPIES	29.20
	PRINTING EXPENSES	12.50
	RELATIVITY DATA HOSTING	1,660.00
	SCANNING	4.00
TOTAL DISBURSEMENTS		1,803.70



DEBORAH D WILLIAMSON
DEBORAH WILLIAMSON

FEBRUARY 11, 2026

MATTER #: 122686.000002
INVOICE #: 3714344
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TASK SUMMARY

TASK	TASK DESCRIPTION	HOURS	AMOUNT
B110	CASE ADMINISTRATION	5.90	2,372.00
B120	ASSET ANALYSIS AND RECOVERY	0.60	285.00
B130	ASSET DISPOSITION	2.90	1,377.50
B210	BUSINESS OPERATIONS	5.00	2,375.00
B240	TAX ISSUES	4.00	1,900.00
B310	CLAIMS ADMINISTRATION & OBJECT	0.90	398.50
TOTAL		19.30	8,708.00



777 Woodward Avenue, Suite 400 • Detroit, MI 48226 • EIN# 38-1446628

DUE UPON RECEIPT

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

FEBRUARY 11, 2026
MATTER #: 122686.000005
INVOICE #: 3700772

FOR PROFESSIONAL SERVICES RENDERED

RE: RECEIVER REPRESENTATION IN COMPLAINT

FEES	\$	322.00
INVOICE TOTAL	\$	322.00



DEBORAH D WILLIAMSON
DEBORAH WILLIAMSON

MATTER #: 122686.000005
INVOICE #: 3700772
PAGE 2

FEBRUARY 11, 2026

RE: RECEIVER REPRESENTATION IN COMPLAINT

DATE	ID	DESCRIPTION	HOURS
10/01/25	DNR	CORRESPONDENCE WITH RECEIVER REGARDING RESPONSE DEADLINE AND EXECUTION OF DEEDS IN CONJUNCTION WITH NON-SUIT.	0.30
10/02/25	DNR	REVISE PLAINTIFF'S NOTICE OF NON-SUIT.	0.10
10/02/25	DADO	DRAFT NOTICE OF NONSUIT; EMAIL CORRESPONDENCE WITH DANIELLE RUSHING BEHREND'S REGARDING DRAFTED NOTICE; FINALIZE NOTICE OF NONSUIT.	0.40
TOTAL HOURS			0.80
TOTAL			\$322.00



DEBORAH D WILLIAMSON
DEBORAH WILLIAMSON

MATTER #: 122686.000005
INVOICE #: 3700772
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FEBRUARY 11, 2026

BILLING SUMMARY

ID	TIMEKEEPER	HOURS	RATES	AMOUNT
DNR	DANIELLE R. BEHRENDTS	0.40	475.00	190.00
DADO	DOMINIQUE A. DOUGLAS	0.40	330.00	132.00
	TOTAL	0.80		\$322.00



DEBORAH D WILLIAMSON
DEBORAH WILLIAMSON

FEBRUARY 11, 2026

MATTER #: 122686.000005
INVOICE #: 3700772
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TASK SUMMARY

TASK	TASK DESCRIPTION	HOURS	AMOUNT
BT160	LITIGATION CONSULTING	0.80	322.00
	TOTAL	0.80	322.00

EXHIBIT E-2



Ocean Centre - Montagu Foreshore - East Bay Street - P.O. Box N-3247 - Nassau, Bahamas
 Tel: (242) 502-5200 / (242) 394-8410-4 - Fax: (242) 502-5250 / (242) 394-8430
 Email: info@higgsjohnson.com www.higgsjohnson.com

VAT INVOICE

Deborah D. Williamson
 Dykema, 112 E Pecan Street
 Suite 1800
 San Antonio, Texas 78205
 U.S.A.

November 18, 2025
 TIN: 100011726
 Invoice No. 198415
 TAAG

Attn: Danielle Behrends

Client: Deborah D. Williamson
 Re: 035665 - 000101: Receivership action SEC v. The Heartland Group Ventures, LLC
 et al.

Professional Services

Date	Services	Hours	Amount
11/17/25	TAAG Review email on 17th November, 2025 from Dominique Douglas attaching Motion; review Motion; liaise with Real Estate Partner.	0.50	400.00
11/18/25	TAAG Consider revisions to the draft Motion on 18th November, 2025.	0.50	400.00
11/18/25	JMM Reviewing and making amendment to the motion seeking authority for approval of the sale procedure for the Bahamaian Properties from a Real Estate perspective; liaising with TAAG on the same.	1.00	600.00

Summary of Services

		Rate	Hours	Amount
TAAG	Tara A Archer-Glasgow - Partner	800.00	1.00	800.00
JMM	Ja'Ann M Major - Partner	600.00	1.00	600.00
Total for Services				\$1,400.00

Sub Total	\$1,400.00
VAT	140.00
Total for Services and Expenses	<u>\$1,540.00</u>

Please make payment in US\$ Dollars
US\$ Equivalent Includes \$3.30 Wire Transfer Fee **\$1,551.06**

**HIGGS & JOHNSON**
Counsel & Attorneys-at-Law

Ocean Centre - Montagu Foreshore - East Bay Street - P.O. Box N-3247 - Nassau, Bahamas
Tel: (242) 502-5200 / (242) 394-8410-4 - Fax: (242) 502-5250 / (242) 394-8430
Email: info@higgsjohnson.com www.higgsjohnson.com

Invoice Date: November 18, 2025
Invoice No. 198415
Attorney: Tara A Archer-Glasgow
Client Name: Deborah D. Williamson
Client No: 035665
Matter No: 000101
Matter Name: Receivership action SEC v. The Heartland Group Ventures, LLC et al.

Total for Services	1,400.00
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Total for Expenses	0.00
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\$1,400.00

VAT at 10%	140.00
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B\$ 1,540.00

Please make payment in US\$ Dollars includes \$3.30 Wire Fee **\$1,551.06**



Ocean Centre - Montagu Foreshore - East Bay Street - P.O. Box N-3247 - Nassau, Bahamas
 Tel: (242) 502-5200 / (242) 394-8410-4 - Fax: (242) 502-5250 / (242) 394-8430
 Email: info@higgsjohnson.com www.higgsjohnson.com

VAT INVOICE

Deborah D. Williamson
 Dykema, 112 E Pecan Street
 Suite 1800
 San Antonio, Texas 78205
 U.S.A.

December 10, 2025
 TIN: 100011726
 Invoice No. 198778
 TAAG

Attn: Danielle Behrends

Client: Deborah D. Williamson
 Re: 035665 - 000101: Receivership action SEC v. The Heartland Group Ventures, LLC
 et al.

Professional Services

Date	Services	Hours	Amount
11/19/25 JMM	Email communication to the client enclosing our comments on the draft motion; further communication regarding the VAT Stamp on the Conveyances; liaising with DIR for updated tax certificates.	0.25	150.00

Summary of Services

	Rate	Hours	Amount
JMM Ja'Ann M Major - Partner	600.00	0.25	150.00

Total for Services

\$150.00

Sub Total

\$150.00

VAT 15.00

Total for Services and Expenses

\$165.00

**Please make payment in US\$ Dollars
 US\$ Equivalent Includes \$3.30 Wire Transfer Fee**

\$169.15

**HIGGS & JOHNSON****Counsel & Attorneys-at-Law****Ocean Centre - Montagu Foreshore - East Bay Street - P.O. Box N-3247 - Nassau, Bahamas****Tel: (242) 502-5200 / (242) 394-8410-4 - Fax: (242) 502-5250 / (242) 394-8430****Email: info@higgsjohnson.com www.higgsjohnson.com**

Invoice Date: December 10, 2025
Invoice No. 198778
Attorney: Tara A Archer-Glasgow
Client Name: Deborah D. Williamson
Client No: 035665
Matter No: 000101
Matter Name: Receivership action SEC v. The Heartland Group Ventures, LLC et al.

Total for Services	150.00
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Total for Expenses	0.00
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\$150.00

VAT at 10%	15.00
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B\$ 165.00

Please make payment in US\$ Dollars includes \$3.30 Wire Fee **\$169.15**

EXHIBIT E-3



Ahuja & Consultants, Inc.
Certified Public Accountants

Ahuja & Consultants, Inc.

2901 N. Dallas Pkwy
Suite 320
Plano, TX 75093

Invoice # 8238.HL
Invoice Date: 12/31/2025
Due Date: 1/31/2026

Bill To:
Dykema
Attn: Deborah Williamson

Q4 2025 BILLING SUMMARY

TASK	TASK DESCRIPTION	HOURS	AMOUNT
2900	Accounting/Auditing	43.10	\$ 9,709.00
4900	Advisory Services	0.40	\$ 130.00

TOTAL **\$ 9,839.00**



Ahuja & Consultants, Inc.
Certified Public Accountants

Ahuja & Consultants, Inc.

2901 N. Dallas Pkwy
Suite 320
Plano, TX 75093

Invoice # 8238.HL
Invoice Date: 12/31/2025
Due Date: 1/31/2026

Bill To:
Dykema
Attn: Deborah Williamson

Q4 2025 BILLING SUMMARY

ID	TIMEKEEPER	TITLE	HOURS	RATE	AMOUNT
CB	Carolyn Bremer	Engagement Leader	0.40	\$325.00	\$ 130.00
DS	Divya Shetty	Manager	25.80	\$250.00	\$ 6,450.00
JW	Jennifer Wallace	Senior Associate	16.30	\$180.00	\$ 2,934.00
MA	Madhu Ahuja	Engagement Leader	1.00	\$325.00	\$ 325.00
			TOTAL	43.50	\$ 9,839.00



Ahuja & Consultants, Inc.
Certified Public Accountants

Ahuja & Consultants, Inc.
2901 N. Dallas Pkwy
Suite 320
Plano, TX 75093

Invoice # 8238.HL
Invoice Date: 12/31/2025
Due Date: 1/31/2026

Bill To:
Dykema
Attn: Deborah Williamson

Q4 2025 EXPENSE REIMBURSEMENT

EXPENSE	AMOUNT

TOTAL **\$0.00**

EXHIBIT E-4



410 Exchange, Ste 100
Irvine, CA 92602
855.812.6112

Invoice: 17228
Date: 11/15/2025
Due Date: 12/15/2025
Terms: Net 30

Bill To:
Heartland

Item	Quantity	Unit Price	Amount
October 2025 Invoice			
Hourly Fees			\$823.00
TOTAL DUE			\$823.00
THANK YOU.			
TOTAL ACCOUNT BALANCE DUE			\$10,877.02

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



Case Name: Heartland

Summary of Hourly Fees

Date Range: 10/01/2025 - 10/31/2025

Role	Hours	Rate	Total
Analyst	0.3	\$50.00	\$15.00
Director	0.9	\$195.00	\$175.50
Specialized Managing Director	0.1	\$625.00	\$62.50
Specialized Senior Associate	1.2	\$475.00	\$570.00
		Total	\$823.00



Case Name: Heartland

Time Detail

Date Range: 10/01/2025 - 10/31/2025

Date	Employee Name	Role	Task	Description	Hours
10/01/2025	Pete Danpongchareon	Specialized Senior Associate	Case Administration	Review bank data and reconcile account for ledger detail report	0.2
					Subtotal 10/01/2025 0.2
Date	Employee Name	Role	Task	Description	Hours
10/06/2025	Robert Saraceni	Director	Case Administration	Review correspondence from D. Douglas re investor address and contact update, update all files.	0.6
					Subtotal 10/06/2025 0.6
Date	Employee Name	Role	Task	Description	Hours
10/07/2025	Robert Saraceni	Director	Case Administration	Review D. Douglas email and update records of investor for death certificate	0.3
					Subtotal 10/07/2025 0.3
Date	Employee Name	Role	Task	Description	Hours
10/08/2025	Laura Tondreault	Analyst	Case Administration	Prepare and organize general case documents for accuracy and completeness	0.1
10/08/2025	Pete Danpongchareon	Specialized Senior Associate	Case Administration	Review bank data and reconcile account for ledger detail report	0.3
					Subtotal 10/08/2025 0.4
Date	Employee Name	Role	Task	Description	Hours
10/15/2025	Laura Tondreault	Analyst	Case Administration	Prepare and organize general case documents for accuracy and completeness	0.1
10/15/2025	Pete Danpongchareon	Specialized Senior Associate	Case Administration	Review bank data and reconcile account for ledger detail report	0.2
					Subtotal 10/15/2025 0.3
Date	Employee Name	Role	Task	Description	Hours
10/22/2025	Laura Tondreault	Analyst	Case Administration	Prepare and organize general case documents for accuracy and completeness	0.1
10/22/2025	Ryan Moreau	Specialized Senior Associate	Case Administration	Review bank data to reconcile account for ledger detail report	0.3
					Subtotal 10/22/2025 0.4
Date	Employee Name	Role	Task	Description	Hours

Date	Employee Name	Role	Task	Description	Hours
10/30/2025	Pete Danpongchareon	Specialized Senior Associate	Case Administration	Review bank data and reconcile account for ledger detail report	0.2
10/30/2025	Stephen Cady	Specialized Managing Director	Case Administration	Review distributions related communication and activity, and advise team re: same	0.1
Subtotal 10/30/2025					0.3
Total 10/01/2025 - 10/31/2025					2.5



410 Exchange, Ste 100
Irvine, CA 92602
855.812.6112

Invoice: 17577
Date: 12/15/2025
Due Date: 01/14/2026
Terms: Net 30

Bill To:
Heartland

Item	Quantity	Unit Price	Amount
November 2025 Invoice			
Hourly Fees			\$1,486.50
TOTAL DUE			\$1,486.50
THANK YOU.			
TOTAL ACCOUNT BALANCE DUE			\$2,309.50

[Click Here to Pay Now](#)

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



Case Name: Heartland

Summary of Hourly Fees

Date Range: 11/01/2025 - 11/30/2025

Role	Hours	Rate	Total
Analyst	0.1	\$50.00	\$5.00
Director	2.7	\$195.00	\$526.50
Specialized Director	0.5	\$550.00	\$275.00
Specialized Managing Director	0.1	\$625.00	\$62.50
Specialized Senior Associate	1.3	\$475.00	\$617.50
		Total	\$1,486.50



Case Name: Heartland

Time Detail

Date Range: 11/01/2025 - 11/30/2025

Date	Employee Name	Role	Task	Description	Hours
11/03/2025	Robert Saraceni	Director	Case Administration	Prepare and review current check register, prepare distribution / hold analysis for class 4 and prepare distribution statistics. Forward all reports to Receiver.	1.1
					Subtotal 11/03/2025
					1.1
Date	Employee Name	Role	Task	Description	Hours
11/04/2025	Jenice Alduenda	Specialized Director	Case Administration	Review 1099 inquiry from the case team and respond with further details	0.5
11/04/2025	Robert Saraceni	Director	Case Administration	Research files to retrieve 2024 1099 form for John Rogers; draft correspondence to TCM group and Dykema.	0.7
11/04/2025	Stephen Cady	Specialized Managing Director	Case Administration	Correspondence with J. Alduenda via email re: Heartland - Request for	0.1
					Subtotal 11/04/2025
					1.3
Date	Employee Name	Role	Task	Description	Hours
11/05/2025	Pete Danpongchareon	Specialized Senior Associate	Case Administration	Review bank data and reconcile account for ledger detail report	0.4
					Subtotal 11/05/2025
					0.4
Date	Employee Name	Role	Task	Description	Hours
11/07/2025	Laura Tondreault	Analyst	Case Administration	Prepare and organize general case documents for accuracy and completeness	0.1
					Subtotal 11/07/2025
					0.1
Date	Employee Name	Role	Task	Description	Hours
11/12/2025	Pete Danpongchareon	Specialized Senior Associate	Case Administration	Review bank data and reconcile account for ledger detail report	0.4
11/12/2025	Robert Saraceni	Director	Case Administration	Review D. Douglas email regarding investor address update; Update all master address and email files	0.9
					Subtotal 11/12/2025
					1.3
Date	Employee Name	Role	Task	Description	Hours
11/19/2025	Pete Danpongchareon	Specialized Senior Associate	Case Administration	Review bank data and reconcile account for ledger detail report	0.3
					Subtotal 11/19/2025
					0.3

Date	Employee Name	Role	Task	Description	Hours
11/26/2025	Pete Danpongchareon	Specialized Senior Associate	Case Administration	Review bank data and reconcile account for ledger detail report	0.2
Subtotal 11/26/2025					0.2
Total 11/01/2025 - 11/30/2025					4.7



410 Exchange, Ste 100
Irvine, CA 92602
855.812.6112

Invoice: 17938
Date: 01/15/2026
Due Date: 02/14/2026
Terms: Net 30

Bill To:
Heartland

Item	Quantity	Unit Price	Amount
December 2025 Invoice			
Hourly Fees			\$1,461.00
TOTAL DUE			\$1,461.00
THANK YOU.			
TOTAL ACCOUNT BALANCE DUE			\$3,770.50

[Click Here to Pay Now](#)

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

Case Name: Heartland

Summary of Hourly Fees

Date Range: 12/01/2025 - 12/31/2025

Role	Hours	Rate	Total
Analyst	0.4	\$50.00	\$20.00
Director	4.8	\$195.00	\$936.00
Managing Director	1.5	\$210.00	\$315.00
Specialized Senior Associate	0.4	\$475.00	\$190.00
		Total	\$1,461.00

Case Name: Heartland

Time Detail

Date Range: 12/01/2025 - 12/31/2025

Date	Employee Name	Role	Task	Description	Hours
12/03/2025	Dan McElhinney	Managing Director	Case Administration	Prep for and attend fee application hearing	1.2
12/03/2025	Pete Danpongchareon	Specialized Senior Associate	Case Administration	Review bank data and reconcile account for ledger detail report	0.4
					Subtotal 12/03/2025 1.6
Date	Employee Name	Role	Task	Description	Hours
12/05/2025	Laura Tondreault	Analyst	Case Administration	Prepare and organize general case documents for accuracy and completeness	0.1
					Subtotal 12/05/2025 0.1
Date	Employee Name	Role	Task	Description	Hours
12/09/2025	Robert Saraceni	Director	Case Administration	Review correspondence from D. Behrends regarding mailings to select investor, research archived files and retrieve COS files, documents and service lists for select mailings. Forward to D. Behrends	2.1
					Subtotal 12/09/2025 2.1
Date	Employee Name	Role	Task	Description	Hours
12/10/2025	Robert Saraceni	Director	Case Administration	Complete research and retrieval for COS files as requested and provide all files to D. Behrends and D. Douglas.	1.6
					Subtotal 12/10/2025 1.6
Date	Employee Name	Role	Task	Description	Hours
12/12/2025	Brian Soper	Managing Director	Case Administration	Oversight and review of daily case activity and correspondence	0.3
					Subtotal 12/12/2025 0.3
Date	Employee Name	Role	Task	Description	Hours
12/17/2025	Laura Tondreault	Analyst	Case Administration	Prepare and organize general case documents for accuracy and completeness	0.1
					Subtotal 12/17/2025 0.1
Date	Employee Name	Role	Task	Description	Hours
12/18/2025	Robert Saraceni	Director	Case Administration	Perform periodic review and format check register	1.1
					Subtotal 12/18/2025 1.1

Date	Employee Name	Role	Task	Description	Hours
12/22/2025	Laura Tondreault	Analyst	Case Administration	Prepare and organize general case documents for accuracy and completeness	0.1
Subtotal 12/22/2025					0.1
Date	Employee Name	Role	Task	Description	Hours
12/31/2025	Laura Tondreault	Analyst	Case Administration	Prepare and organize general case documents for accuracy and completeness	0.1
Subtotal 12/31/2025					0.1
Total 12/01/2025 - 12/31/2025					7.1

EXHIBIT F-1

Deborah D. Williamson

Member



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 counter-party 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 USA* 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.

Contact

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

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. Korman (*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, and 2023
- 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*, 2003-2023
- 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



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.

Contact

San Antonio
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dbehrrends@dykema.com

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, 2019-2022
- 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

- 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)

Dominique A. Douglas

Associate



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.

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

Contact

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

Areas of client focus

Practices

Corporate and Finance
Restructuring and Bankruptcy

Industries

Loan Workouts, Restructuring,
and Bankruptcy

Affiliations

Professional

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

Adrianna Lafuente
Litigation, Commercial
Dallas, TX
4-6446

ALafuente@dykema.com

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

Education:

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

Experience:

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

Technology Proficiencies:

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

EXHIBIT F-3



TARA A. ARCHER-GLASGOW

PARTNER

"Tara is attentive to the needs of her clients and provides an exceptional level of service."

Chambers Global 2023

tarcher@higgsjohnson.com

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F: +1 242 502 5250

<https://www.linkedin.com/in/tara-archer-glasgow-99183b17/>

Higgs & Johnson

Ocean Centre, Montagu Foreshore

East Bay Street

P O Box N3247

Nassau, The Bahamas



Tara Archer-Glasgow is a Partner and Chair of the firm's Litigation practice group and supervises the Asset Recovery Unit. She also chairs the Intellectual Property group and previously served as Co-chair of the Marketing & Business Development Committee of the firm.

Tara is a highly experienced Dispute Resolution lawyer with more than 27 years of legal experience. She operates a multidisciplinary practice with a focus on all aspects of commercial litigation centered primarily upon banking and compliance, employment, company law and admiralty law. She regularly appears as counsel or co-counsel in many important cases in all of the courts of The Bahamas and appears before the Privy Council in England. Tara provides legal advice to individuals, major financial service providers and global corporations regarding multi-jurisdictional litigation, shareholder disputes, fraud, asset-tracing and internal operations. She has assisted clients in the tracing and recovery of millions of dollars and represents clients in franchise and intellectual property disputes.

Tara also has experience with the insolvency regime in The Bahamas having been involved with a number of cross-border insolvencies including: – Globe-X Canadiana and Globe-X Management; Americas International Bank (In Liquidation); Debtworks, Inc; Suisse Security Bank & Trust and Intraco Corporation Limited (In Official Liquidation). She has acted for a leading global financial institution in proceedings related to a composition with creditors and bankruptcy proceedings in relation to Sir Anthony Reilly and served as a member of the creditors' committee. Tara has advised creditors in several prominent cross border insolvency cases and most notably now represents claimants in the Liquidation of a multi-billion-dollar cryptocurrency exchange.

Tara is recognised as "an experienced and well-regarded litigator" in Chambers Global Guide (2018-2025) and recommended in Who's Who Legal: Asset Recovery (2016-2024), being described as "responsive and intuitive with complex international asset tracing" and "a skilled litigator with an impressive practice". Her peers commend her as "a highly approachable and reassuring presence for clients." According to Client Choice, Tara provides "accurate, in-

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depth and well-researched feedback" and she is ranked as the client's choice in The Bahamas (2024-2025). She was also listed as a 'Leading Partner' by Legal 500 Caribbean (2019-2025) and named as a leading litigator in the Euromoney's Expert Guides.

Tara is actively involved in international legal associations and the Bahamas Bar Association. As a member of the International Bar Association (IBA), Tara serves on the editorial board of Dispute Resolution International (an IBA publication) and is an Officer on the Litigation Committee. She also serves upon the Ethics Committee of The Bahamas Bar Association.

Tara has previously served in a leadership capacity on the Consumer Litigation and Poverty and Social Development committees of the IBA and is a former law lecturer at the University of The Bahamas. She is often invited to share her knowledge and experience as a speaker at international and local conferences and to provide motivational talks to young persons, particularly young women, in the community.

PRACTICE AREAS

- Litigation
 - Civil Litigation
 - Commercial Litigation
 - Employment Law
 - Admiralty Law
- Intellectual Property
- Insolvency & Corporate Restructuring
- Commercial Transactions
- Tax
- Financial Services, Insurance Law & Regulation
 - Banking & Compliance Law
- Government & Regulatory Affairs

EDUCATION

- Inns of Court School of Law, London, England
- University of Essex, *LL.B. (Hons)*, Colchester, England
- University of Western Ontario, *B.A. – Finance & Economics*, London, Ontario, Canada
- College of The Bahamas, *A.A. (Hons) – Economics*, Nassau, Bahamas

EXECUTIVE TRAINING

- Blockchain and Crypto Applications: From Decentralized Finance to Web 3, MIT Sloan School of Management

BAR ADMISSIONS

- Bahamas, 1998
- England and Wales, 1998

PROFESSIONAL MEMBERSHIPS

- International Bar Association
 - Member, Editorial board of *Dispute Resolution International*
 - Co-Chair, IBA Poverty and Social Development Subcommittee
 - Former Chair, IBA Consumer Litigation Committee
- International Trademark Association
- Women's International Shipping and Trading Association (WISTA)
- Bahamas Bar Association
 - Member, Ethics Committee
 - Former Elected Council Member
- Center for International Legal Studies
- The Honourable Society of Lincoln's Inn

LANGUAGES

- English
- Spanish (conversational)

RECOGNITION

- Leading Partner, Dispute Resolution, Legal 500 Caribbean (2025)
- Leading Individual, Dispute Resolution, Legal 500 Caribbean (2019-2024)
- Top Ranked, Dispute Resolution, Chambers Global (2018-2025)
- Asset Recovery, Who's Who Legal (2016-2024)
- Asset Recovery, Lexology Client Choice (2021-2024)
- Euromoney's Expert Guides (2020)

...recognised for her responsive & intuitive approach to complex international asset tracing & recovery actions...
(Who's Who Legal)



- Who's Who Legal, Thought Leaders Reports, Asset Recovery (2024)
- Enforcement of Judgments, Bahamas Chapter, Legal 500 Comparative Guide (2022)
- The Possibilities and Pitfalls of Asset Recovery in The Bahamas, WWL Analysis & Features (2021)
- The Bahamas: Employment Challenges with COVID -19, Women in Business Law (2020)
- The Bahamas: COVID-19 and Contractual Force Majeure, Higgs & Johnson (2020)
- *International Franchising 2016: Legal and Business Considerations* (Bahamas Chapter)
- *Doing business in The Bahamas*, Thomas Reuters Practical Law (2020 – 2021)
- *Enforcement of Foreign Judgements in The Bahamas*, Lexology, Getting the Deal Through (2021-2021)

HIGGS & JOHNSON *Counsel & Attorneys-At-Law*

THE BAHAMAS ■ higgsjohnson.com



JA'ANN M. MAJOR

PARTNER

Ja'Ann Major has a broad practice across the real estate space.

Legal 500 Caribbean 2025

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Higgs & Johnson

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Nassau, The Bahamas



Ja'Ann Major is a Partner and Deputy Chair of the Firm's Real Estate & Development Practice Group.

Ja'Ann has experience in a broad range of real estate and development matters, including residential and commercial property acquisitions and sales by Bahamians and non-Bahamians, preparation of financing and loan documentation, domestic mortgages, title insurance, title investigations, and related opinion work. She advises personnel at local lending institutions on the enforceability of mortgage security and acts on behalf of such lending institutions in the power of sale matters, advising on real property tax matters and other regulatory matters including applications to the Bahamas Investments Board and other governmental entities. She also assists clients with subdivisions, resorts, hotels, and mixed-use developments. Ja'Ann counsels clients daily on legal issues relating to real estate in The Bahamas and relevant regulatory procedures and approvals.

Ja'Ann is also a member of the Firm's Private Client & Wealth Management, Government and Regulatory Affairs, Tax, Commercial Transactions and Maritime & Aviation Practice Groups. Her expertise includes immigration law, particularly work permit and residency applications, as well as probate and estate matters. Additionally, she has experience in commercial law and maritime & shipping law with considerable knowledge of international financing transactions involving Bahamian registered ships and companies.

Ja'Ann obtained a dual honours Bachelor of Arts degree in Law (LL.B.) and Business Administration from Keele University, Staffordshire, England and a Master of Laws (LL.M.) degree from Emory University in Atlanta, Georgia. In 2008, she was admitted to both the Bar of England and Wales and The Bahamas Bar. Ja'Ann became an Associate at Higgs & Johnson in 2011, a Senior Associate in 2019 and joined the partnership in 2023. Ja'Ann is listed as a recommended attorney in the area of Real Estate by *The Legal 500 (Legalease) Caribbean (2023-2025)* and currently serves on the Board of the Bahamas Maritime Authority and the Bahamas Chamber of Commerce & Employers Confederation.

PRACTICE AREAS

- Real Estate & Development
 - Conveyancing
- Private Client & Wealth Management
 - Immigration Law
 - Probate & Estate Administration
- Maritime & Aviation
- Commercial Transactions
- Tax
- Government & Regulatory Affairs

EDUCATION

- LL.B. (Hons) with Business Administration, Keele University, Staffordshire, England
- BPP College of Professional Studies, Leeds, England
- LL.M. Emory University, Atlanta, Georgia

BAR ADMISSIONS

- England and Wales, 2008
- Bahamas, 2008

PROFESSIONAL MEMBERSHIPS

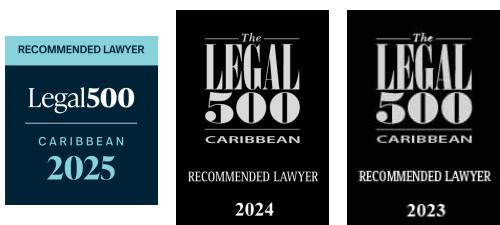
- The Honourable Society of Lincoln's Inn
- Bahamas Bar Association
- Women's International Shipping and Trading Association (WISTA)
- Bahamas Maritime Authority (BMA, Director)
- Bahamas Chamber of Commerce & Employers Confederation (BCCEC, Director)

PUBLICATIONS

- World Bank Group – Doing Business in The Bahamas (2014-2021)

RECOGNITION

- Recommended Lawyer, Real Estate, Legal 500 Caribbean (2023-2025)



HIGGS & JOHNSON *Counsel & Attorneys-At-Law*

EXHIBIT F-4



Ahuja & Consultants, Inc.

Certified Public Accountants

Ahuja & Consultants Staff Supporting Fee Application

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.

Jennifer Wallace

Jennifer Wallace will serve as accounting support staff for this engagement. Jennifer is highly skilled in accounting and data analytics, is extremely detail-oriented with a masters degree in accounting.

EXHIBIT F-5

Daniel McElhinney

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

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.

Brian Soper

For almost 15 years, Brian has overseen the development and expansion of Stretto's Corporate Restructuring Team. Under his direction, streamlined account implementation procedures have been deployed between Stretto's Banking and Client Support Teams, resulting in higher level service and improved case-management efficiency. Brian has directed the onboarding, direction, and securitization of billions of dollars in estate funds for public and privately held companies in such diverse sectors as energy, healthcare, manufacturing, financial services and retail. Clients rely on Brian for his consistent responsiveness and deft approach to identifying solutions to their various banking related needs. Brian serves on the Stretto Executive Management Team, providing thought leadership and guidance on the company's services geared toward corporate-restructuring Attorneys, fiduciaries, and receivers, as well as financial and turnaround advisors. Recognized as an Emerging Leader by M&A Advisor, he is committed to supporting key industry organizations, and is a member of ABI, TMA, AIRA, and NAFER.

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.

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.

Pete Danpongchareon

In his role as Senior Associate, Pete 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.

Ryan Moreau

In his role as Senior Associate, Ryan 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.

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.