

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

**UNITED STATES SECURITIES
AND EXCHANGE COMMISSION,**

Plaintiff,

v.

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

Defendants,

and

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

Relief Defendants.

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

**RECEIVER’S FEE APPLICATION FOR SERVICES PERFORMED BETWEEN
JULY 1, 2023 AND SEPTEMBER 30, 2023, AND BRIEF IN SUPPORT**

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

Pursuant to the *Order Approving Employment of Dykema Gossett PLLC as Counsel to the Receiver Effective as of December 3, 2021* [ECF No. 19] (the “Dykema Employment Order”), the *Order Approving Employment of Rose L. Romero of the Law Offices of Romero | Kozub as Local Counsel to Receiver Effective December 3, 2021* [ECF No. 24] (the “Romero Employment Order”), the *Order* [ECF No. 87] (the “Jones Employment Order”) approving the *Application to Employ Law Practice of Darrell R. Jones, PLLC as Counsel to Receiver Effective December 2, 2021*, the *Order* [ECF No. 106] (the “Palmour Employment Order”) approving the *Application to Employ Vicki Palmour Consulting, LLC as Oil and Gas Consultant to Receiver Effective January 1, 2022*, the *Order* [ECF No. 180] (the “Ahuja Employment Order”) approving the *Application to Employ Ahuja & Clark, PLLC as Accountants to Receiver Effective April 1, 2022*, and the *Order* [ECF No. 331] (the “Stretto Employment Order”) approving the *Receiver’s Application to Employ Bankruptcy Management Solutions Inc. d/b/a Stretto as Claims and Disbursement Agent, Deborah D. Williamson, in her capacity as the Court-appointed Receiver* (the “Receiver”) for the Receivership Parties (as defined in the *Order Appointing Receiver* [ECF No. 17] (the “Receivership Order”))¹ and receivership estates (collectively, the “Receivership Estates”) in the above-captioned case (the “Case” or the “Receivership”), hereby submits this *Receiver’s Fee Application for Services Performed Between July 1, 2023 and September 30, 2023, and Brief in Support* (the “Application”) of Deborah D. Williamson, as Receiver, Dykema Gossett PLLC (“Dykema”), Rose L. Romero with the Law Offices of Romero | Kozub (“Romero”), the Law

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

Practice of Darrell R. Jones, PLLC (“Jones”), Vicki Palmour Consulting, LLC (“Palmour”), Ahuja & Clark, PLLC (“Ahuja”), and Bankruptcy Management Solutions Inc. d/b/a Stretto (“Stretto”).

In support of the Application, the Receiver respectfully states as follows:

I. OVERVIEW

1. As more fully detailed in the *Receiver’s Eighth Quarterly Report for Receivership Estates* [ECF No. 426] (the “Eighth Report”), the Receiver, with the assistance of her Retained Personnel, finalized and filed the claims process motion, entered into plugging agreement with a landowner, continued the process of obtaining executed division orders for various operators, continued to identify and attempt to resolve issues with the Railroad Commission of Texas (“RRC”), identified and attempted to resolve pre-receivership reporting issues with the Texas Comptroller of Public Accounts (the “Comptroller”) and the Texas General Land Office (the “GLO”), closed on the Electra property and continued marketing the Eldorado ranch² for sale, held an online, public auction of personal property pursuant to Court-approved procedures, and began preparing for the abandonment of certain oil and gas properties throughout seven (7) counties. Amounts owed for production to third parties unaffiliated with any Receivership Party continued to be identified and payments were issued. A substantial amount of time was spent in the third quarter of 2023 on the claims process and methodology. Analysis was completed regarding amounts of the claims of known investors, and the Receiver’s team presented the claims process motion for Court consideration on October 16, 2023. At the conclusion of the claims process, the Receiver will propose a distribution methodology for Court approval. Additionally, the Receiver

² As noted in the *Notice of Proposed Sale of Real Property* [ECF No. 425], the Receiver accepted an offer to purchase the Eldorado ranch at a proposed sale price of \$1,325,000.00 on October 26, 2023, subject to timely higher offers. The Receiver anticipates closing on the sale of the Eldorado ranch in the fourth quarter of 2023.

and her team continue to analyze various records relating to other potential assets and/or claims of the Estates.

2. The Receiver and her team continued communications with investors, vendors, creditors, and other stakeholders. The website (www.heartlandreceivership.com) is continuously updated with key court documents, notices, and reports. Communications with investors, vendors, and other creditors heavily increased in September 2023 after the Receiver filed the claims process motion.

3. A considerable amount of the time spent by the Receiver and her Retained Personnel during the third quarter of 2023 is directly attributable to the reconciliation of investments for known investors and the claims analysis and process.

4. The Receiver remains very cognizant of the need to balance performance of her duties with costs. Comparing this Application Period (as defined below) to the prior, the Receiver's hours decreased from 152.40 hours in the second quarter of 2023 to 136.40 hours in this Application Period. Dykema's total billable hours decreased from 459.00 hours in the second quarter of 2023 to 390.90 hours during this Application Period. Dykema has also voluntarily reduced the requested reimbursement by \$9,273.00, including time spent by the Receiver and by Dykema attorneys during the Application Period.

5. At the beginning of the third quarter of 2023, the Receiver had \$9,480,831.68 on deposit. At the end of the third quarter of 2023, the amount on deposit was \$9,086,361.25 after payments of operating expenses and Court-approved fees and expenses. As of the filing of this Application (November 1, 2023), \$9,170,084.13 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 July 1, 2023 through September 30, 2023

(the “Application Period”), by the Receiver in the amount of \$90,247.50 for fees; Dykema, as lead counsel to the Receiver, in the amount of \$136,627.85 for fees and in the amount of \$15,100.81 for expenses; Romero, as local counsel to the Receiver, in the amount of \$977.50 for fees; Jones, as oil and gas transactional counsel to the Receiver, in the amount of \$16,477.50 for fees; Palmour, as oil and gas consultant to the Receiver, in the amount of \$8,000.00 for fees; Ahuja, as tax and forensic accountants to the Receiver, in the amount of \$128,508.00 for fees and in the amount of \$8.71 for expenses; and Stretto, as claims and disbursement agent to the Receiver, in the amount of \$20,261.25 for fees and in the amount of \$10,067.72 for expenses. The Receiver respectfully requests this Court enter the proposed order attached hereto as **Exhibit B**, approving this Application on an interim basis and authorizing the Receiver to pay outstanding amounts approved thereunder.

7. The Receivership Order at ¶ 62 requires that the “Receiver and Retained Personnel shall apply to the Court for compensation and expense reimbursement from the Receivership Estates” within forty-five (45) days of the end of each calendar quarter. Thus, this Application covers July 1, 2023 through September 30, 2023.

III. GENERAL BACKGROUND

8. This Application is submitted in accordance with the Receivership Order, the local rules of this Court, and the *Billing Instructions for Receivers in Civil Actions Commenced by the United States Securities and Exchange Commission* (the “Commission Billing Instructions”), and other applicable orders of this Court. The Receiver, Dykema, Romero, Jones, Palmour, Ahuja, and Stretto have previously submitted fee applications to this Court in this Case. *See generally* ECF Nos. 132, 198, 245, 280, 334, 361, 286. Through the second quarter of 2023, the Receiver, Dykema, Romero, Palmour, Jones, Ahuja, and Stretto have been paid on an interim basis for services performed on behalf of the Receiver in this Case, all to the extent authorized by

this Court. *See generally* ECF Nos. 163, 216, 259, 265, 290, 348, 372, 407. The Receiver submitted this Application to the Commission (as defined below) for review prior to submission to the Court.

A. Procedural History

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

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

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

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

13. Further, the Receivership Order authorizes the Receiver to “engage and employ persons in the Receiver’s discretion to assist the Receiver in carrying out the Receiver’s duties and

responsibilities[.]” *Id.* at ¶ 8(H). Thus, the Receiver engaged Dykema as her lead counsel on December 3, 2021, and Jones as her oil and gas transactional counsel effective on the same date.

14. On December 3, 2021, the Receiver filed under seal her *Application to Employ Dykema Gossett PLLC as Counsel to Receiver Effective as of December 3, 2021* [ECF No. 18] (the “Dykema Application”). As detailed in the Dykema Application, the Receiver agreed to significantly discounted rates for Dykema professionals through 2022 in this Case.³ Dykema has agreed to keep the discounted rates through 2023.

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

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

17. On the same date, the Receiver filed under seal her *Application to Employ Law Practice of Darrell R. Jones, PLLC as Counsel to Receiver Effective as of December 2, 2021* [ECF No. 22] (the “Jones Application”). As detailed in the Jones Application, Mr. Jones discounted his standard hourly rate through 2022 in this Case, which is an additional discount to the Receivership Estates.

³ The Receiver’s standard hourly rate for 2021 was \$840.00, the Receiver’s standard hourly rate for 2022 was \$880.00, and the Receiver’s standard hourly rate for 2023 is \$950.00. Dykema members’ and senior counsels’ standard hourly rates ranged from \$425.00-\$925.00 for 2021 and \$425.00-\$1,400.00 for 2022. Dykema members’ and senior counsels’ standard hourly rates range from \$470.00-\$1,400.00 for 2023. Dykema associates’ and senior attorneys’ standard hourly rates ranged from \$370.00-\$505.00 for 2021 and \$395.00-\$530.00 for 2022. Dykema associates and senior attorneys’ standard hourly rates range from \$395-\$610 for 2023.

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

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

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

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

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

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

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

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

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

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

B. Work Performed During the Application Period

28. Since the beginning of this Case, the tasks and challenges presented have been numerous and, in many instances, novel, complex, and time-consuming. The efforts of the Receiver and her Retained Personnel during the Application Period resulted in tangible progress towards a distribution to investors and other creditors, as evidenced herein for the third quarter of 2023.

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

30. Generally, the bulk of Dykema's services rendered during the Application Period included drafting motions, notices, and other pleadings with the Court and appearing before the Court at various hearings, including on the claims process motion; formulating and refining the

proposed claims procedure and associated notices, forms, and other documents for investors and non-investor creditors; assisting the Receiver with mitigation of risks; preparing for and attending a hearing before an appeals officer with the Internal Revenue Service (“IRS”) with respect to Barron Petroleum LLC (“Barron Petroleum”); obtaining executed division orders for various operators; responding to a substantial number of investor, other creditor, and federal and state governmental agency correspondences, particularly relating to the claims process motion; selling certain real and personal property through Court-approved sale procedures; and identifying and attempting to resolve issues with the RRC, Comptroller, and the GLO. Dykema did not charge the Receivership Estates for time preparing this Application or the underlying billing statements. A full description of Dykema’s services during the Application Period is detailed below.

31. Romero’s services rendered during the Application Period included preparation for and attendance at hearings before this Court and communications with the Receiver regarding the status of issues with the RRC and the proposed claims process.

32. Jones’s services rendered during the Application Period included communications with field and operation personnel regarding operational, environmental, and regulatory issues; supervision of the Receivership Parties’ communications with governmental agencies and farmout process; communications with potential plugging contractors; and communications with the Receiver regarding this Case.

33. Palmour’s services rendered during the Application Period included regulatory reporting to various state agencies, including, but not limited to, the RRC, the GLO, and the Comptroller. Palmour’s regulatory reporting and management included, but was not limited to:

- (a) Reviewing daily mail, e-mails, etc. from the RRC regarding alleged violations, including field or filing violations, and researching methods to resolve alleged violations in the most economic manner;

- (b) Filing W-10s (Oil Well Status Report) and G-10s (Gas Well Status Report) for Arcooil Corp. (“ArcoOil”), Panther City Energy LLC (“Panther City”) and Dodson Prairie Oil & Gas LLC (“Dodson Prairie”) wells through the effective date of abandonment;
- (c) Weekly conference calls with the Receiver and her team regarding operations and compliance;
- (d) Filing production reports on Barron Petroleum, ArcoOil, Panther City, Dodson Prairie, and Leading Edge Energy LLC (“Leading Edge”) wells;
- (e) Reviewing alleged RRC violation letters and severances on various wells;
- (f) Preparing and filing H-10 (Annual Disposal/Injection Well Monitoring Report) for ArcoOil and Leading Edge wells;
- (g) Corresponding with the RRC regarding the processing of various P-4s (Certificate of Compliance and Transportation Authority);
- (h) Researching and reviewing production and suspense reports for Barron Petroleum and Panther City;
- (i) Discussing and preparing revenue distribution strategy in anticipation of abandonment of certain oil and gas properties;
- (j) Researching, preparing, and filing GLO-2 and GLO-3 forms with the GLO for Sutton County; and
- (k) Reviewing ArcoOil, Barron Petroleum, Dodson Prairie, Leading Edge, and Panther City wells for critical infrastructure filings with the RRC.

34. Ahuja’s services rendered during the Application Period included analysis and review of available tax and bank records of Receivership Parties; preparation and filing of amended federal tax return for Dallas Resources Inc. (“Dallas Resources”) for the 2022 tax year; preparing five (5) Texas franchise tax returns and associated reports; responding to various notices from the Internal Revenue Service, Social Security Administration, Texas Workforce Commission, and other governmental authorities for various Receivership Parties; appearing at the IRS appeals hearing of Barron Petroleum; and reconciling financial information for potential demand letters as requested by the Receiver.

35. Stretto's services rendered during the Application Period included review of the claims and balances of the Receivership accounts and other claims-related documents, processing materials and information available to formulate a claims database, and preparing and revising investor and non-investor matrices.

C. Fees and Expenses Summary During the Application Period

36. The Receiver expended an aggregate of 136.40 hours on this Case during the Application Period. The Receiver's fees for the Application Period total \$90,247.50.

37. 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 390.90 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 \$136,627.85 and expenses incurred in connection with services performed on behalf of the Receiver during the Application Period total \$15,100.81.⁴ Of the attorney hours expended by Dykema (exclusive of the Receiver), approximately 5% was attributable to members/senior counsel and approximately 95% was attributable to senior attorneys/associates.⁵

38. Romero reported an aggregate of 2.30 hours on this Case during the Application Period. At Romero's hourly rate of \$425.00 per hour, Romero's fees for the Application Period total \$977.50. Romero did not incur any expenses during the Application Period.

39. Jones expended an aggregate of 50.70 hours on this Case during the Application Period. At Jones's discounted standard hourly rate of \$325.00 per hour for all counsel, Jones's

⁴ 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.

⁵ Paraprofessional and litigation support staff time is excluded from these values.

fees for the Application Period total \$16,477.50. Jones did not incur any expenses during the Application Period.

40. Palmour expended an aggregate of 80.00 hours on this Case during the Application Period. Palmour's fees for the Application Period total \$8,000.00. Palmour did not incur any expenses during the Application Period.

41. Ahuja expended an aggregate of 486.40 hours on this Case during the Application Period. Ahuja's fees for the Application Period total \$128,508.00, and Ahuja's expenses incurred in connection with services performed on behalf of the Receiver during the Application Period total \$8.71.

42. Stretto expended an aggregate of 124.60 hours on this case during the Application Period. Stretto's fees for the Application Period total \$20,261.25, and Stretto's expenses incurred in connection with services performed on behalf of the Receiver during the Application Period total \$10,067.72.

IV. RECORDS SUPPORTING THIS APPLICATION

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

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

45. All services performed by Dykema, Romero, Jones, Palmour, Ahuja, and Stretto were performed for and on the behalf of the Receiver and not on behalf of any other individual or

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

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

47. In addition, Dykema, Romero, Jones, Palmour, Ahuja, and Stretto have categorized their services by task. Attached hereto as **Exhibit D** is the *Summary of Fees by Task for All Matters*, which summarizes the number of hours incurred relative to each task category for each firm during the Application Period. It contains individualized and detailed descriptions of the daily services rendered and the hours expended by the professionals employed on behalf of the Receiver in this Case. During this Application Period, Dykema incurred \$15,100.81 in expenses in connection with the rendition of services on behalf of the Receiver, Ahuja incurred \$8.71 in expenses in connection with the rendition of services on behalf of the Receiver, and Stretto incurred \$10,067.72 in expenses in connection with the rendition of services on behalf of the Receiver. The Receiver, Romero, Jones, and Palmour did not incur any expenses during the Application Period.

48. Attached hereto as **Exhibit E-1** is the invoice of Dykema, with the Receiver's time and travel separated out, during the Application Period. Attached hereto as **Exhibit E-2** is the invoice of Romero during the Application Period. Attached hereto as **Exhibit E-3** is the invoice

of Jones during the Application Period. Attached hereto as **Exhibit E-4** is the invoice of Palmour during the Application Period. Attached hereto as **Exhibit E-5** is the invoice of Ahuja during the Application Period. Attached hereto as **Exhibit E-6** is the invoice of Stretto during the Application Period. The Receiver has reviewed and approved these time records, and based on the complexity and novelty of issues presented (some of which are of first impression for this Court) in this Case, the Receiver respectfully submits that the requested compensation is reasonable.

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

V. STANDARDIZED FUND ACCOUNTING REPORT

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

VI. BRIEF IN SUPPORT OF APPLICATION

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

52. Under governing law, following a determination that services were rendered and costs were expended in furtherance of the Case, the Court may award compensation for the presented fees based on the lodestar method of calculation. *See SEC v. EFS, LLC*, No. 3:06-CV-1097-M, 2007 WL 649008, at *13 (N.D. Tex. Jan. 24, 2007) (internal citations omitted). Under the lodestar method, “a party seeking an award of attorney’s fees has the burden of proving the reasonableness of the hours expended and the rates charged, and the district court must be able to determine the reasonable number of hours expended and the reasonable hourly rate for each participating attorney.” *SEC v. Megafund Corp.*, No. 3:05-CV-01328-L, 2006 WL 42367, at *4 (N.D. Tex. Jan. 9, 2006). When determining whether the time spent, services performed, expenses incurred, and hourly rates charged are reasonable and necessary under the factors set forth by the Fifth Circuit, courts consider: (1) the time and labor required for the litigation; (2) the novelty and complication of the issues; (3) the skill required to properly litigate the issues; (4) whether the attorney was precluded from other employment by acceptance of the case; (5) the attorney’s customary fee; (6) whether the fee is fixed or contingent; (7) whether the client or the circumstances imposed time limitations; (8) the amount involved and the results obtained; (9) the experience, reputation, and ability of the attorney; (10) the “undesirability” of the case; (11) the nature and length of the attorney-client relationship; and (12) awards in similar cases. *Johnson v. Ga. Hwy. Express, Inc.*, 488 F.2d 714, 717–19 (5th Cir. 1974); *see, e.g., SEC v. Millennium Bank, et al.*, No. 7:09-CV-00050-O (ECF Nos. 193, 197, 296); *SEC v. Megafund Corp.*, 2008 WL 2839998, at *2 (N.D. Tex. June 24, 2008); *SEC v. Funding Res. Grp.*, 3:98-CV-02689-M, 2003 WL 145411, at *1 (N.D. Tex. Jan. 15, 2003). In applying the *Johnson* factors, the district court should explain its findings and the reasons upon which an award is based, but “it is not required to address fully each of the 12 factors.” *Curtis v. Bill Hanna Ford, Inc.*, 822 F.2d 549, 552 (5th Cir.

1987) (citation omitted). This examination of reasonable and necessity should take into account all of the circumstances surrounding the case. *See SEC v. W.L. Moody & Co., Bankers (Unincorporated)*, 374 F. Supp. 465, 480 (S.D. Tex. 1974), *aff'd*, 519 F.2d 1087 (5th Cir. 1975). The court should analyze the fees and expenses relative to each receivership case. *See SEC v. Tanner*, No. 05-04057, 2007 WL 2013606, at *3 (D. Kan. May 22, 2007).

53. The complexity and difficulty associated with the receivership case are highly relevant factors in determining the reasonableness of professional fees. *See W.L. Moody & Co.*, 374 F. Supp. at 484; *SEC v. Fifth Ave. Coach Lines, Inc.*, 364 F. Supp. 1220, 1222 (S.D.N.Y. 1973). Since the inception of this Case, the Receiver and her team have had to conduct their work without meaningful assistance from nearly all of the Defendants and Relief Defendants, exacerbated by the inability to access the various Receivership Parties' accounting and regulatory books, records, and software. The Receiver and her Retained Personnel, particularly during this Application Period, have spent significant time and resources attempting to narrow and resolve various state and federal governmental agency issues, mostly notably involving the RRC and the IRS. The plethora of RRC issues presented in this Case, as the Court is aware, are of first impression with respect to oil and gas abandonment within the receivership context.

54. The Receiver and her Retained Personnel diligently worked during the Application Period on a proposed claims procedure that is as simplified as possible for the Case's known investors and other creditors. Many known investors in this Case do not own computers or have access to email or the internet. Thus, the Receiver's proposed claims procedure provides for both electronic and hardcopy noticing to known investors and other creditors, while also protecting the name and contact information of known creditors. The Receiver's proposed claims procedure also places as little burden as possible on known investors. As proposed, if a known investor agrees

with the Receiver's proposed claim amount, then the known investor does not need to submit a proof of claim with supporting documentation to Stretto. However, if a known investor disputes the Receiver's proposed claim amount, then the known investor would be required to submit a proof of claim, along with supporting documentation, to Stretto on or before the proposed claims bar date. Keeping the proposed claims procedure as simple as possible for the known investors required the Receiver and her Retained Personnel to trace funds, review books and records, and reconcile transactions of over 726 known investors. Additionally, the Receiver and her Retained Personnel drafted notices, forms, and schedules for both known investors and other non-investor creditors.

55. The degree of success or recovery achieved in solving the issues presented in a receivership case should be considered when calculating the fees awarded. *See Johnson*, 488 F.2d at 718; *W.L. Moody & Co.*, 374 F. Supp. at 484–85; *Fifth Ave. Coach Lines, Inc.*, 364 F. Supp. at 1222. The application must prove the exercise of billing judgment in calculating the hours expended. *See SEC v. AmeriFirst Funding, Inc.*, No. 3:07-CV-0118-D, 2008 WL 2185193, at *7 (N.D. Tex. May 7, 2008) (internal citations omitted). “Billing judgment requires documentation of the hours charged[.]” *Id.* The Receiver, Dykema, Romero, Jones, Palmour, Ahuja, and Stretto have provided documentation for all hours billed and have exercised business judgment in the submission of the invoices attached to this Application.

56. Since December 2021, the Receiver and her team have successfully recovered over \$10 million dollars and continue to conduct auctions of personal property and attempt to sell real property. The Receiver and her team have continued to identify Receivership Assets and formulate a plan of recovery and/or liquidation going forward. During the Application Period, the Receiver and her Retained Personnel sold real property and obtained rulings in favor of the Receivership

Estates, many of which are described in the Application’s Overview. Judge O’Connor also issued his September 5, 2023 *Order* [ECF No. 404] (the “Abandonment Order”) accepting Judge Ray’s *Amended Findings, Conclusions, and Recommendation of the United States Magistrate Judge* [ECF No. 388] (the “Oil and Gas R&R”) with respect to oil and gas abandonment. On October 9, 2023, the Receiver executed *Notices of Abandonment* with respect to certain oil and gas properties pursuant to the Abandonment Order, which were submitted for recording in seven (7) counties across Texas.

57. Courts also examine the credentials, experience, reputation, and other professional qualities required to carry out a receiver’s duties and responsibilities when assessing the reasonableness of the rates charged for services in a receivership. *See W.L. Moody & Co.*, 374 F. Supp. at 481; *SEC v. Aquacell Batteries, Inc.*, No. 6:07-cv-608-Orl-22DAB, 2008 WL 276026, at *4 (M.D. Fla. Jan. 31, 2008) (“The Receiver retained well qualified, experienced counsel and such representation does not come cheap.”). Biographies of all Retained Personnel of the Receiver are attached hereto as **Exhibits F-1, F-2, F-3, F-4, F-5, F-6, and F-7** for the Receiver, Dykema, Romero, Jones, Palmour, Ahuja, and Stretto, respectively.⁶

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

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

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

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

Dykema

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

62. Dykema is a national law firm with offices throughout the United States. Dykema has provided critical legal expertise and manpower for every aspect of this Case to date. The

attorneys working on this Case have included members, senior attorneys, 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. The Receiver has further reduced fees by placing primary responsibility for research and drafting on associates/senior attorneys.

63. During the Application Period, Dykema undertook numerous tasks to further the goals of the Case, including, but not limited to:

- (a) Communicating with investors, creditors, and other state and federal governmental authorities regarding various Receivership Parties, including, but not limited to, via website (www.heartlandreceivership.com), email (heartlandreceivership@dykema.com), and telephone (210-554-5845);
- (b) Researching, drafting, and filing various pleadings and proposed orders, notices, and supporting documentation, as applicable;
- (c) Representing the Receiver in various matters before the Court;
- (f) Facilitating administrative and daily operational tasks requested by the Receiver;
- (g) Selling certain real and personal property pursuant to Court-approved sale procedures;
- (h) Attempting to narrow and resolve issues relating to various governmental agencies;
- (i) Mitigating risks of the Receiver; and

- (j) Research, drafting, and formulating the proposed claims procedure in this Case.

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

Romero

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

Jones

66. During the Application Period, Jones served as the Receiver's oil and gas transactional counsel in this Case. Jones coordinated and oversaw field personnel and operations of the oil and gas-related Receivership Assets and the farmout process. In addition, Jones communicated with the Receiver throughout the Application Period regarding open operational and regulatory issues in the Case. Jones also negotiated plugging agreements with two (2) surface owners.

Palmour

67. During the Application Period, Palmour served as the Receiver's oil and gas consultant in this Case and was instrumental in submitting regulatory reports on behalf of the Receiver to various governmental agencies. Palmour also continued analyzing oil and gas documentation on various Receivership Party wells and prepared documentation requested by the Receiver and/or her counsel.

Ahuja

68. During the Application Period, Ahuja served as the Receiver's accountants in this Case to analyze and review available tax and bank records of Receivership Parties. Ahuja continued its efforts to accurately report the sale of the airplane owned by Dallas Resources, which required (i) tracing of funds used to purchase the plane to the entity where funds were recorded, (ii) identifying the correct percentage of business and personal use; and (iii) correcting the tax return for Dallas Resources and the financials for Barron Petroleum. Ahuja responded to various notices from the Internal Revenue Service, Social Security Administration, Texas Workforce Commission, and other governmental authorities for various Receivership Parties.

69. With respect to forensic accounting, Ahuja performed preliminary solvency analysis tests for various Receivership Parties and responded to the Receiver's counsel on specific investment questions. Ahuja also supported the Receiver, her counsel, and her claims and noticing agent by providing an investment analysis and other financial information in support of the claims process motion. Further, Ahuja provided the Receiver and her counsel with financial and forensic analysis regarding the alleged assumption, assignment, and payment of Texas International Energy Production, Inc. ("TIEP") promissory notes by Receivership Party The Heartland Group Fund III, LLC and/or payments to TIEP investors made by Receivership Party Heartland Production and Recovery Fund LLC.

Stretto

70. During the Application Period, Stretto served as the Receiver's claims and disbursement agent in this Case. Stretto communicated with the Receiver and her Retained Personnel throughout the Application Period regarding the proposed claims process and associated forms and notices and began formulating the claims database.

Fees and Expenses of Receiver's Retained Personnel

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

72. The Receiver, Dykema, Romero, Jones, Palmour, Ahuja, and Stretto have incurred reasonable fees and/or expenses consistent with the Receivership Order in the best interests of the Receivership Estates, and payment is appropriate and warranted in consideration of the services performed in this Case during the Application Period.

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

<u>PROFESSIONAL</u>	<u>TOTAL HOURS</u>	<u>TOTAL FEES</u>	<u>TOTAL EXPENSES</u>
Deborah D. Williamson, Receiver	136.40 hours	\$90,247.50	\$0.00
Dykema Gossett PLLC	390.90 hours	\$136,627.85	\$15,100.81
Law Offices of Romero Kozub	2.30 hours	\$977.50	\$0.00
Law Practice of Darrell R. Jones, PLLC	50.70 hours	\$16,477.50	\$0.00
Vicki Palmour Consulting, LLC	80.00 hours	\$8,000.00	\$0.00
Ahuja & Clark, PLLC	486.40 hours	\$128,508.00	\$8.71
Bankruptcy Management Solutions Inc. d/b/a Stretto	124.60 hours	\$20,261.25	\$10,067.72

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

75. The fees associated with complex receivership cases often have been substantial percentages of the total assets found. *See, e.g., Megafund*, 2008 WL 2839998, at *2 (N.D. Tex. June 24, 2008); *Funding Res. Grp.*, 2003 WL 145411, at *1 (N.D. Jan. 15, 2003). As the Court can see in **Exhibits E-1, E-2, E-3, E-4, E-5, and E-6**, the Receiver and her Retained Personnel have been mindful of keeping fees expended to a minimum, while ensuring that the goals and needs of the Case, particularly, the hundreds of investors and other creditors, are met. If the fees and expenses are approved and paid as requested, remaining amounts will exceed \$8.7 million, without taking into account sales proceeds for subsequent auctions or sales of personal and/or real property.

VII. CONCLUSION

76. For the reasons stated herein, the Receiver requests that the Court enter an order (a) approving on an interim basis and authorizing payment of (i) all fees incurred by the Receiver during the Application Period, totaling \$90,247.50, (ii) all fees incurred by Dykema as counsel to the Receiver during the Application Period, totaling \$136,627.85, (iii) all fees incurred by Romero as counsel to the Receiver during the Application Period, totaling \$977.50, (iv) all fees incurred by Jones as oil and gas transactional counsel to the Receiver during the Application Period, totaling \$16,477.50, (v) all fees incurred by Palmour as oil and gas consultant to the Receiver during the Application Period, totaling \$8,000.00, (vi) all fees incurred by Ahuja as tax and forensic accountants to the Receiver during the Application Period, totaling \$128,508.00, and (vii) all fees incurred by Stretto as claims and disbursement agent to the Receiver during the Application Period, totaling \$20,261.25; (b) approving on an interim basis and authorizing payment of (i) all expenses incurred by Dykema in connection with services rendered as lead counsel to the Receiver during the Application Period, totaling \$15,100.81, (ii) all expenses incurred by Ahuja in connection with services rendered as tax and forensic accountants to the Receiver during the Application Period,

totaling \$8.71, and (iii) all expenses incurred by Stretto in connection with services rendered as claims and disbursement agent to the Receiver during the Application Period, totaling \$10,067.72; (c) authorizing the Receiver to pay (i) all authorized outstanding fee amounts to Dykema, including the Receiver's fees, totaling \$226,875.35, (ii) all authorized outstanding fee amounts to Romero, totaling \$977.50, (iii) all authorized outstanding fee amounts to Jones, totaling \$16,477.50, (iv) all authorized outstanding fee amounts to Palmour, totaling \$8,000.00, (v) all authorized outstanding fee amounts to Ahuja, totaling \$128,508.00, and (vi) all authorized outstanding fee amounts to Stretto, totaling \$20,261.25; (d) authorizing the Receiver to pay (i) all authorized outstanding expenses of Dykema, totaling \$15,100.81, (ii) all authorized outstanding expenses of Ahuja, totaling \$8.71, and (iii) all authorized outstanding expenses of Stretto, totaling \$10,067.72; and (e) awarding such other and further relief that this Court deems just and proper.

Dated: November 1, 2023

Respectfully submitted,

By: /s/ Deborah D. Williamson

Deborah D. Williamson

(Receiver)

State Bar No. 21617500

dwilliamson@dykema.com

DYKEMA GOSSETT PLLC

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Telephone: (682) 267-1351

and

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LAW PRACTICE OF

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Telephone: (832) 302-5373

COUNSEL TO RECEIVER

and

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

**OIL AND GAS CONSULTANT
TO RECEIVER**

and

Madhu Ahuja
AHUJA & CLARK, PLLC
2901 N. Dallas Parkway, Suite 320
Plano, Texas 75093
Telephone: (469) 467-4660

ACCOUNTANT TO RECEIVER

and

Sheryl Betance
**BANKRUPTCY MANAGEMENT
SOLUTIONS INC. D/B/A STRETTO**
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 consents to the relief requested herein.

/s/ Danielle Rushing Behrends
Danielle Rushing Behrends

CERTIFICATE OF SERVICE

I hereby certify that on November 1, 2023, 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/ Danielle Rushing Behrends
Danielle Rushing Behrends

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 Romero's fee schedule attached to the Application, and such fees are reasonable, necessary, and commensurate with the skill and expertise required for the activity performed;
- (d) Romero has not included in the amount for which reimbursement is sought the amortization of the cost of any investment, equipment, or capital outlay (except to the extent that any such amortization is included within the permitted allowable amounts set forth herein for photocopies and facsimile transmission); and
- (e) In seeking reimbursement for a service which Romero justifiably purchased or contracted for from a third party, Romero requests reimbursement only for the amount billed by the third-party vendor and paid for by Romero to such vendor. If such services are performed by the Receiver, the Receiver will certify that she is not making a profit on such reimbursable service.

/s/ Rose L. Romero

Rose L. Romero
Law Offices of Romero | Kozub
Applicant

APPLICATION CERTIFICATION

I hereby certify that:

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

/s/ Darrell R. Jones

Darrell R. Jones

Law Practice of Darrell R. Jones, PLLC

Applicant

APPLICATION CERTIFICATION

I hereby certify that:

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

/s/ Vicki Palmour

Vicki Palmour

Vicki Palmour Consulting, LLC

Applicant

APPLICATION CERTIFICATION

I hereby certify that:

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

/s/ Madhu Ahuja
Madhu Ahuja
Ahuja & Clark, PLLC
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/ Sheryl Betance

Sheryl Betance

Bankruptcy Management Solutions Inc.

d/b/a Stretto

Applicant

EXHIBIT A

		Detail	Subtotal	Grand Total
1	Beginning Balance (July 1, 2023):			\$ 9,480,831.68
2	Business Income	Operations payments	2,194.89	2,194.89
3	Cash and Cash Equivalents	Funds turned over to Receiver	-	
4	Interest/Dividend Income		40,083.63	40,083.63
5	Business Asset Liquidation	Property and asset sales	90.00	90.00
6	Personal Asset Liquidation		10,355.60	10,355.60
7	Third-Party Litigation Income		-	-
8	Miscellaneous - Other	Refunds	15,226.93	15,226.93
	Total Funds Available			\$ 9,548,782.73
9	Disbursements to Investors		-	-
10	Disbursements for Receivership Operations			462,421.48
10a	Disbursements to Receiver or Other Professionals	Payments to Attorneys, Accountants, Receiver	350,534.31	
10b	Business Asset and Operating Expenses	Utilities, Insurance Premiums, Operator/Independent Contractor payments, filing/recording fees, storage fees, royalty payments	34,447.19	
10c	Personal Asset Expenses		-	
10d	Investment Expenses		-	
10e	Third-Party Litigation Expenses		-	
10f	Tax Administrator Fees and Bonds		-	
10g	Federal and State Tax Expenses	Texas State Comptroller, US Treasury	77,439.98	
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			\$ 462,421.48
13	Ending Balance (September 30, 2023)			\$ 9,086,361.25
14	Ending Balance of Fund - Net Assets			
14a	Cash & Cash Equivalents			\$ 9,086,361.25
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			

The Heartland Group Ventures, LLC, et al., - Cash Basis

Civil Action No.: 4:21-CV-01310-O

Standardized Fund Accounting Report

Reporting Period: 7/1/2023 to 9/30/2023

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

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,

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Defendants,

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and

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

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Relief Defendants.

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

**ORDER APPROVING RECEIVER'S FEE APPLICATION FOR SERVICES
PERFORMED BETWEEN JULY 1, 2023 AND SEPTEMBER 30, 2023**

Before the Court is the *Fee Application for Services Performed Between July 1, 2023 and September 30, 2023* (the "Application"),¹ filed by Deborah D. Williamson, Court-appointed Receiver in the Case, pursuant to the Court's *Order Appointing Receiver*, entered on December 2, 2021, in this Case, requesting approval and authorization of fees and expenses incurred by Deborah D. Williamson, as Receiver; Dykema Gossett PLLC ("Dykema"); the Law Offices of Romero | Kozub ("Romero"); Law Practice of Darrell R. Jones, PLLC ("Jones"); Vicki Palmour Consulting, LLC ("Palmour"); Ahuja & Clark, PLLC ("Ahuja"); and Bankruptcy Management Solutions Inc. d/b/a Stretto ("Stretto"), during the Application Period. Upon consideration of the Application, the Court finds that: (i) it has subject matter jurisdiction over the Application; (ii) it has personal jurisdiction over the Receivership Parties; (iii) the Receiver, Dykema, Romero, Jones, Palmour, Ahuja, and Stretto have provided reasonable services at reasonable rates that have benefitted the Receivership Estates during the Application Period; (iv) the relief requested in the Application is in the best interests of the Receivership Estates and all parties-in-interest thereof; (v) proper and adequate notice of the Application has been given and that no other or further notice is necessary; and (vi) the deadline for filing objections to the Application has expired and no objection to the Application was filed with this Court; accordingly,

IT IS HEREBY ORDERED, ADJUDGED, AND DECREED THAT:

1. The Application is **APPROVED** to the extent set forth herein.
2. The Receiver's fees incurred during the Application Period are approved on an interim basis and allowed in the amount of **\$90,247.50**.

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

3. Dykema's fees incurred during the Application Period are approved on an interim basis and allowed in the amount of **\$136,627.85**.

4. Romero's fees incurred during the Application Period are approved on an interim basis and allowed in the amount of **\$977.50**.

5. Jones's fees incurred during the Application Period are approved on an interim basis and allowed in the amount of **\$16,477.50**.

6. Palmour's fees incurred during the Application Period are approved on an interim basis and allowed in the amount of **\$8,000.00**.

7. Ahuja's fees incurred during the Application Period are approved on an interim basis and allowed in the amount of **\$128,508.00**.

8. Stretto's fees incurred during the Application Period are approved on an interim basis and allowed in the amount of **\$20,261.25**.

9. Dykema's expenses incurred during the Application Period in connection with services rendered on behalf of the Receiver are approved on an interim basis and allowed in the amount of **\$15,100.81**.

10. Ahuja's expenses incurred during the Application Period in connection with services rendered on behalf of the Receiver are approved on an interim basis and allowed in the amount of **\$8.71**.

11. Stretto's expenses incurred during the Application Period in connection with services rendered on behalf of the Receiver are approved on an interim basis and allowed in the amount of **\$10,067.72**.

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

SO ORDERED.

[_____], 2023.

HAL R. RAY, JR.
UNITED STATES MAGISTRATE JUDGE

Prepared and submitted by:

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

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Danielle Rushing Behrends

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and

Rose L. Romero

State Bar No. 17224700

Rose.Romero@RomeroKozub.com

LAW OFFICES OF ROMERO | KOZUB

235 N.E. Loop 820, Suite 310

Hurst, Texas 76053

Telephone: (682) 267-1351

and

Darrell R. Jones

State Bar No. 24029642

drj@oilesquire.com

LAW PRACTICE OF

DARRELL R. JONES, PLLC

5300 Memorial Drive, Suite 475

Houston, Texas 77007

Telephone: (832) 302-5373

COUNSEL TO RECEIVER

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

<u>TIMEKEEPER</u>	<u>HOURS</u>	<u>HOURLY RATE</u>	<u>TOTAL FEES</u>
Deborah D. Williamson	131.00 hours	\$675.00	\$88,425.00
Deborah D. Williamson (travel)	5.40 hours	\$337.50	\$1,822.50

Dykema Gossett PLLC

<u>TIMEKEEPER</u>	<u>TITLE</u>	<u>HOURS</u>	<u>HOURLY RATE</u>	<u>TOTAL FEES</u>
Fine, Jeffrey R.	Member	0.90 hours	\$675.00	\$607.50
Giltner, Teresa E.	Member	7.90 hours	\$526.50	\$4,159.35
Huffstickler, Patrick L.	Member	6.80 hours	\$544.50	\$3,702.60
Behrends, Danielle Rushing	Senior Attorney	344.00 hours	\$350.00	\$120,400.00
Behrends, Danielle Rushing (travel)	Senior Attorney	12.70 hours	\$175.00	\$2,222.50
Wombacher, Michael D.	Associate	10.00 hours	\$333.00	\$3,330.00
Dick, Theresa E.	Paralegal	8.60 hours	\$256.50	\$2,205.90

Law Offices of Romero | Kozub

<u>TIMEKEEPER</u>	<u>HOURS</u>	<u>HOURLY RATE</u>	<u>TOTAL FEES</u>
Rose L. Romero	2.30 hours	\$425.00	\$977.50

Law Practice of Darrell R. Jones, PLLC

<u>TIMEKEEPER</u>	<u>HOURS</u>	<u>HOURLY RATE</u>	<u>TOTAL FEES</u>
Darrell R. Jones	13.90 hours	\$325.00	\$4,517.50
Eric Hillerman	36.80 hours	\$325.00	\$11,960.00

Vicki Palmour Consulting, LLC

<u>TIMEKEEPER</u>	<u>HOURS</u>	<u>HOURLY RATE</u>	<u>TOTAL FEES</u>
Palmour, Vicki	12.50 hours	\$100.00	\$1,250.00
Amburn, Amy	12.00 hours	\$100.00	\$1,200.00
Jobe, Tammy	9.00 hours	\$100.00	\$900.00
Gober, Tyna	20.00 hours	\$100.00	\$2,000.00
Riggins, Jennifer	26.50 hours	\$100.00	\$2,650.00

Ahuja & Clark, PLLC

<u>TIMEKEEPER</u>	<u>HOURS</u>	<u>HOURLY RATE</u>	<u>TOTAL FEES</u>
Ahuja, Madhu	30.60 hours	\$325.00	\$9,945.00
Blevins, Jeanne-Marie	32.75 hours	\$120.00	\$3,930.00
Bremer, Carolyn	121.90 hours	\$325.00	\$39,617.50
Cecil, Anthony	162.10 hours	\$250.00	\$40,525.00
Huser, Stacey	107.20 hours	\$250.00	\$26,800.00
Kandy, Linu Dayaran	3.00 hours	\$180.00	\$540.00
Peterson, Dawn	0.40 hours	\$95.00	\$38.00
Shetty, Divya	28.45 hours	\$250.00	\$7,112.50

Bankruptcy Management Solutions Inc. d/b/a Stretto

<u>TIMEKEEPER</u>	<u>HOURS</u>	<u>HOURLY RATE</u>	<u>TOTAL FEES</u>
Aragon, Pauline	2.10 hours	\$30.00	\$63.00
Betance, Sheryl	5.00 hours	\$210.00	\$1,050.00
Bribiesca, David	3.50 hours	\$97.50	\$341.25
Cady, Stephen	0.40 hours	\$185.00	\$74.00
Chacaqua, Alberto	3.40 hours	\$97.50	\$331.50
De Guzman, Jessie	0.40 hours	\$135.00	\$54.00
Ingram, Jacob	2.00 hours	\$65.00	\$130.00
IT Staff	34.20 hours	\$165.00	\$5,643.00
Kennedy, Nicholas	1.40 hours	\$195.00	\$273.00
Marshall, Aimee	0.30 hours	\$130.00	\$39.00
McElhinney, Dan	15.30 hours	\$210.00	\$3,213.00
Membrino, Melissa	1.80 hours	\$175.00	\$315.00
Morales, Stephanie	0.50 hours	\$40.00	\$20.00
Quang, Ricky	2.00 hours	\$65.00	\$130.00
Ramirez, Daniel	5.10 hours	\$130.00	\$663.00
Rodriguez, Naomi	0.50 hours	\$65.00	\$32.50
Rubio, Antonio	0.80 hours	\$65.00	\$52.00
Saraceni, Robert	31.90 hours	\$185.00	\$5,901.50
Wasserman, Kevin	10.30 hours	\$130.00	\$1,339.00
Westmorland, Alexa	2.10 hours	\$185.00	\$388.50
Wheeler, Charles	1.60 hours	\$130.00	\$208.00

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

<u>Category Description</u>	<u>Total Billable Amount</u>	<u>Total Billable Time</u>
Case Administration	\$8,235.00	14.90 hours
Asset Analysis and Recovery	\$5,602.50	8.30 hours
Asset Disposition	\$15,660.00	23.20 hours
Business Operations	\$13,837.50	20.50 hours
Tax Issues	\$8,640.00	12.80 hours
Claims Administration and Objection	\$14,377.50	21.30 hours
Status Reports	\$1,620.00	2.40 hours
Litigation Consulting	\$22,275.00	33.00 hours
TOTAL	\$90,247.50	136.40 hours

Dykema Gossett PLLC

<u>Category Description</u>	<u>Total Billable Amount</u>	<u>Total Billable Time</u>
Case Administration	\$19,900.90	58.30 hours
Asset Analysis and Recovery	\$17,155.10	44.40 hours
Asset Disposition	\$23,216.85	62.80 hours
Business Operations	\$29,575.00	84.50 hours
Tax Issues	\$10,150.00	29.00 hours
Claims Administration and Objection	\$17,780.00	50.80 hours
Status Reports	\$6,480.00	19.00 hours
Litigation Consulting	\$12,670.00	42.10 hours
TOTAL	\$136,627.85	390.90 hours

Law Offices of Romero | Kozub

<u>Category Description</u>	<u>Total Billable Amount</u>	<u>Total Billable Time</u>
Asset Disposition	\$467.50	1.10 hours
Case Administration	\$255.00	0.60 hours
Claims Administration	\$255.00	0.60 hours
TOTAL	\$977.50	2.30 hours

Law Practice of Darrell R. Jones, PLLC

<u>Category Description</u>	<u>Total Billable Amount</u>	<u>Total Billable Time</u>
Asset Disposition	\$13,942.50	42.90 hours
Business Operations	\$2,210.00	6.80 hours
Status Reports	\$325.00	1.00 hours
TOTAL	\$20,410.00	62.80 hours

Vicki Palmour Consulting, LLC

<u>Category Description</u>	<u>Total Billable Amount</u>	<u>Total Billable Time</u>
Regulatory Work	\$5,050.00	50.50 hours
Accounting Work	\$2,950.00	29.50 hours
TOTAL	\$8,000.00	80.00 hours

Ahuja & Clark, PLLC

<u>Category Description</u>	<u>Total Billable Amount</u>	<u>Total Billable Time</u>
Accounting/Auditing	\$13,850.00	55.40 hours
Tax Issues	\$17,685.50	62.65 hours
Forensic Accounting	\$96,972.50	368.35 hours
TOTAL	\$128,508.00	486.40 hours

Bankruptcy Management Solutions Inc. d/b/a Stretto

<u>Category Description</u>	<u>Total Billable Amount</u>	<u>Total Billable Time</u>
Case Administration	\$10,838.75	71.70 hours
Claims Administration and Objections	\$9,422.50	52.90 hours
TOTAL	\$20,261.25	124.60 hours

EXHIBIT E-1



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

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

DUE UPON RECEIPT

OCTOBER 30, 2023
MATTER #: 122686.000001
INVOICE #: 3550510

FOR PROFESSIONAL SERVICES RENDERED

RE: RECEIVER'S TIME

FEES	\$	23,692.50
INVOICE TOTAL	\$	23,692.50



DEBORAH D WILLIAMSON
DEBORAH WILLIAMSON

MATTER #: 122686.000001
INVOICE #: 3550510
PAGE 2

OCTOBER 30, 2023

RE: RECEIVER'S TIME

DATE	ID	DESCRIPTION	TASK	HOURS	AMOUNT
07/05/23	DDW	PREPARE FOR AND ATTEND CALL WITH AHUJA & CLARK ON TAX ISSUES.	B240	1.00	675.00
07/05/23	DDW	PREPARE FOR AND ATTEND CALL REGARDING OIL AND GAS ISSUES.	B210	0.90	607.50
07/05/23	DDW	PREPARE FOR CONFERENCE REGARDING MEDIATION AND DOCUMENT REQUESTS.	BT160	0.80	540.00
07/06/23	DDW	REVIEW PROPOSED FORM REGARDING TERMINATION OF MOTOR CARRIER PERMITS AND CONFERENCE REGARDING SAME.	B210	0.40	270.00
07/06/23	DDW	CONFERENCE REGARDING GENERAL LAND OFFICE CLAIM FOR ROYALTIES.	B210	0.40	270.00
07/06/23	DDW	CONFERENCE REGARDING DIESEL FUEL PERMIT NOTICES AND COMMUNICATIONS WITH TEXAS COMPTROLLER.	B210	0.40	270.00
07/07/23	DDW	PREPARE FOR AND ATTEND CONFERENCE WITH SEC.	B110	0.90	607.50
07/07/23	DDW	CONFERENCE AND EMAILS REGARDING BAHAMAS DISCOVERY.	B120	0.60	405.00
07/07/23	DDW	CONFERENCE REGARDING IRS CLAIMS.	B240	0.60	405.00
07/10/23	DDW	PREPARE FOR AND ATTEND CONFERENCE REGARDING RAILROAD COMMISSION, ALLEGED ENVIRONMENTAL AND OTHER ISSUES.	B210	0.80	540.00
07/10/23	DDW	TELEPHONE CALL WITH INVESTOR.	B110	0.40	270.00
07/11/23	DDW	CONVERSATION WITH AHUJA & CLARK REGARDING TAX RETURNS.	B240	0.30	202.50
07/11/23	DDW	PREPARE FOR AND ATTEND CONFERENCE WITH STRETTO REGARDING DEVELOPMENT OF CLAIMS PROCESS AND RELATED ISSUES INCLUDING REVIEW OF PROPOSED CLAIMS FORMS.	B310	0.90	607.50
07/11/23	DDW	CONFERENCE REGARDING PRE-SUIT DISCOVERY REQUESTS.	BT160	0.40	270.00
07/11/23	DDW	CONFERENCES REGARDING BAHAMAS ASSET SEARCH.	B120	0.40	270.00
07/12/23	DDW	PREPARE FOR AND ATTEND MEETING REGARDING PRE-SUIT DISCOVERY IN CONNECTION WITH MEDIATION INCLUDING REVIEW OF PROPOSED DISCOVERY AND DOCUMENTS TO BE PRODUCED.	BT160	1.10	742.50



DEBORAH D WILLIAMSON
DEBORAH WILLIAMSON

MATTER #: 122686.000001
INVOICE #: 3550510
PAGE 3

OCTOBER 30, 2023

DATE	ID	DESCRIPTION	TASK	HOURS	AMOUNT
07/12/23	DDW	CONFERENCES AND EMAILS REGARDING INVESTIGATION ON BAHAMAS PROPERTIES.	B120	0.60	405.00
07/13/23	DDW	REVIEW AND RESPOND TO EMAILS REGARDING ELDORADO SALE PROCESS.	B130	0.40	270.00
07/13/23	DDW	REVIEW OF REVISED PROPOSED EXHIBITS AND RELATED EMAILS FOR MEDIATION AND DRAFT RESPONSIVE EMAILS.	BT160	0.90	607.50
07/14/23	DDW	REVIEW OF UPDATES REGARDING ASSIGNMENT OF LEASES AND P-4S, ENVIRONMENTAL CLEANUP OF RAILROAD COMMISSION ISSUES, CASH DEPOSITS.	B210	0.40	270.00
07/17/23	DDW	PREPARE FOR AND ATTEND CONFERENCE WITH AHUJA & CLARK ON TAX ISSUES, TRACING OF PAYMENTS AND SIMILAR ISSUES.	B240	1.20	810.00
07/17/23	DDW	REVIEW AND RESPOND TO UPDATES REGARDING POTENTIAL REPLACEMENT OPERATORS.	B130	0.30	202.50
07/17/23	DDW	REVIEW OF PROPOSED EXHIBITS FOR MEDIATION DISCOVERY; DRAFT AND RESPOND TO EMAILS REGARDING SAME.	BT160	1.60	1,080.00
07/17/23	DDW	REVIEW OF MULTIPLE RAILROAD COMMISSION OF TEXAS NOTICES REGARDING P-5S, PIPELINE AND OTHER ISSUES.	B210	0.60	405.00
07/17/23	DDW	REVIEW AND RESPOND TO EMAILS REGARDING ELECTRA SALE PROCESS AND COUNTEROFFERS.	B130	0.50	337.50
07/18/23	DDW	REVIEW AND REVISE QUARTERLY REPORT AND CONFERENCES REGARDING SAME.	B110	1.10	742.50
07/18/23	DDW	REVIEW OF PROPOSAL ON INSURANCE AND ELECT COVERAGE.	B210	0.40	270.00
07/18/23	DDW	REVIEW OF REPORT ON VAL VERDE/CROCKETT OPERATIONS.	B210	0.40	270.00
07/18/23	DDW	REVIEW AND RESPOND TO MULTIPLE COMMUNICATIONS REGARDING PRE-MEDIATION PRODUCTION AND PREPARATION.	BT160	0.70	472.50
07/18/23	DDW	APPROVE PAYMENTS.	B210	0.20	135.00
07/18/23	DDW	REVIEW AND RESPOND TO UPDATES REGARDING POTENTIAL NEW OPERATORS AND RELATED ISSUES.	B130	0.40	270.00
07/18/23	DDW	CONFERENCES WITH MS. BEHREND'S REGARDING CLAIMS PROCESS, NOTICING, ADDRESSES AND OTHER RELATED INFORMATION.	B310	0.60	405.00
07/19/23	DDW	FINAL REVIEW AND APPROVAL OF QUARTERLY REPORT.	BT155	0.60	405.00
07/19/23	DDW	REVIEW OF INFORMATION REGARDING "DYED DIESEL", UNPAID TAXES AND COMPTROLLER REPORTS.	B240	0.40	270.00



DEBORAH D WILLIAMSON
DEBORAH WILLIAMSON

MATTER #: 122686.000001
INVOICE #: 3550510
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OCTOBER 30, 2023

DATE	ID	DESCRIPTION	TASK	HOURS	AMOUNT
07/19/23	DDW	CONFERENCES REGARDING NOTICES FROM SOCIAL SECURITY ADMINISTRATION REGARDING HEARTLAND VENTURES AND AOS.	B240	0.60	405.00
07/19/23	DDW	CONFERENCE REGARDING POTENTIAL CLAIMS RELATED TO CERTAIN PAYMENTS AND PROCESS FOR ISSUANCE OF DEMAND LETTERS.	BT160	0.90	607.50
07/19/23	DDW	APPROVE PAYMENT FOR BAHAMAS DOCUMENTS.	B120	0.20	135.00
07/20/23	DDW	REVIEW OF APPRAISALS FOR INDIAN STYLED JEWELRY.	B130	0.40	270.00
07/20/23	DDW	APPROVE PAYMENTS.	B210	0.30	202.50
07/20/23	DDW	REVIEW OF RESEARCH REGARDING BAHAMAS PROPERTY.	B120	0.30	202.50
07/20/23	DDW	REVIEW OF REPORT ON CLEANUP OF ALLEGED ENVIRONMENTAL ISSUES.	B210	0.30	202.50
07/21/23	DDW	CONFERENCE REGARDING W-2S FOR AOS AND HEARTLAND AND REVIEW OF EMAILS REGARDING SAME.	B240	0.40	270.00
07/21/23	DDW	APPROVE PAYMENTS.	B210	0.40	270.00
07/24/23	DDW	REVIEW OF REPORT AND RECOMMENDATION REGARDING ABANDONMENT MOTIONS; DRAFT, REVIEW AND RESPOND TO EMAILS REGARDING SAME.	B130	0.80	540.00
07/25/23	DDW	PREPARE FOR AND ATTEND MEETING WITH AHUJA & CLARK ON REVISED TAX RETURNS AND OTHER ISSUES.	B240	1.00	675.00
07/25/23	DDW	REVIEW NOTICE OF WITHDRAWALS OF APPLICATIONS TO TRANSFER P-4S DRAFT AND RESPOND TO EMAILS REGARDING NEXT STEPS.	B130	0.50	337.50
07/25/23	DDW	BRIEF REVIEW OF RAILROAD COMMISSION AND IRS CORRESPONDENCE.	B210	0.50	337.50
07/25/23	DDW	REVIEW OF REPORTS REGARDING PRODUCTION.	B210	0.20	135.00
07/25/23	DDW	TELEPHONE CALL WITH AUCTIONEER REGARDING JEWELRY PRICING.	B130	0.40	270.00
07/25/23	DDW	APPROVE PAYMENTS.	B210	0.30	202.50
07/25/23	DDW	CONFERENCE REGARDING QUARTERLY REPORTS, RECEIPTS AND DISBURSEMENTS.	BT155	0.30	202.50
07/26/23	DDW	REVIEW AND APPROVE REVISED RECEIPTS AND DISBURSEMENTS FOR QUARTERLY REPORT.	BT155	0.60	405.00
07/26/23	DDW	REVIEW AND APPROVE QUARTERLY REPORT.	BT155	0.90	607.50
07/26/23	DDW	REVIEW INFORMATION RELATED TO ESTIMATED VALUES FOR CERTAIN JEWELRY AND APPROVE PRICING.	B130	0.70	472.50



DEBORAH D WILLIAMSON
DEBORAH WILLIAMSON

MATTER #: 122686.000001
INVOICE #: 3550510
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OCTOBER 30, 2023

DATE	ID	DESCRIPTION	TASK	HOURS	AMOUNT
07/26/23	DDW	REVIEW AND APPROVE ELECTRA CONTRACT.	B130	0.40	270.00
07/27/23	DDW	PREPARE FOR AND ATTEND MEETING WITH AHUJA & CLARK REGARDING AMENDED RETURNS AND OTHER TAX ISSUES.	B240	0.80	540.00
07/28/23	DDW	REVIEW OF ADDITIONAL REQUESTS FOR INFORMATION PRIOR TO MEDIATION; DRAFT RESPOND TO REID COLLINS REGARDING PROPOSED RESPONSES.	BT160	0.80	540.00
07/31/23	DDW	PREPARE FOR AND ATTEND MEETING REGARDING RAILROAD COMMISSION, TRANSFERS OF P-4S AND OTHER OPERATIONAL ISSUES.	B210	0.70	472.50
07/31/23	DDW	REVIEW AND REVISE COMMUNICATION WITH INVESTORS.	B110	0.50	337.50
07/31/23	DDW	TELEPHONE CALL WITH MR. HILLERMAN REGARDING LANDOWNER'S PROPOSAL TO PLUG WELLS AND RELEASE EQUIPMENT.	B130	0.30	202.50
TOTAL				35.10	\$23,692.50



DEBORAH D WILLIAMSON
DEBORAH WILLIAMSON

MATTER #: 122686.000001
INVOICE #: 3550510
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OCTOBER 30, 2023

BILLING SUMMARY

ID	TIMEKEEPER	TITLE	HOURS	RATE	AMOUNT
DDW	DEBORAH WILLIAMSON	MEMBER	35.10	675.00	23,692.50
	TOTAL		35.10		\$23,692.50



DEBORAH D WILLIAMSON
DEBORAH WILLIAMSON

MATTER #: 122686.000001
INVOICE #: 3550510
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OCTOBER 30, 2023

TASK SUMMARY

TASK	TASK DESCRIPTION	HOURS	AMOUNT
B110	CASE ADMINISTRATION	2.90	1,957.50
B120	ASSET ANALYSIS AND RECOVERY	2.10	1,417.50
B130	ASSET DISPOSITION	5.10	3,442.50
B210	BUSINESS OPERATIONS	7.60	5,130.00
B240	TAX ISSUES	6.30	4,252.50
B310	CLAIMS ADMINISTRATION & OBJECT	1.50	1,012.50
BT155	STATUS REPORTS	2.40	1,620.00
BT160	LITIGATION CONSULTING	7.20	4,860.00
	TOTAL	35.10	23,692.50



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

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

DUE UPON RECEIPT

OCTOBER 30, 2023
MATTER #: 122686.000001
INVOICE #: 3550509

FOR PROFESSIONAL SERVICES RENDERED

RE: RECEIVER'S TIME

FEES	\$	34,695.00
INVOICE TOTAL	\$	34,695.00



DEBORAH D WILLIAMSON
DEBORAH WILLIAMSON

MATTER #: 122686.000001
INVOICE #: 3550509
PAGE 2

OCTOBER 30, 2023

RE: RECEIVER'S TIME

DATE	ID	DESCRIPTION	TASK	HOURS	AMOUNT
08/01/23	DDW	REVIEW AND EXECUTE DOCUMENTS REGARDING SALE OF PROPERTY IN ELECTRA.	B130	0.50	337.50
08/01/23	DDW	REVIEW AND APPROVE PAYMENTS.	B210	0.40	270.00
08/01/23	DDW	REVIEW OF CURRENT STATUS OF AUCTION REGARDING PERSONAL PROPERTY AND JEWELRY.	B130	0.30	202.50
08/01/23	DDW	REVIEW OF REPORTS REGARDING BAHAMAS PROPERTY AND CONFERENCES WITH MS. BEHREND'S REGARDING SAME.	B120	0.90	607.50
08/02/23	DDW	PREPARE FOR AND ATTEND CONFERENCE WITH REID COLLINS REGARDING MEDIATION INCLUDING REVIEW OF PROPOSED PRE-MEDIATION PRODUCTION INCLUDING IDENTIFICATION AND REVIEW OF MOTIONS TO APPROVE SETTLEMENTS AND RELATED CONFIDENTIALITY PROVISIONS.	BT160	1.90	1,282.50
08/02/23	DDW	REVIEW AND REVISE PROPOSED CLARIFICATION TO REPORT AND RECOMMENDATION REGARDING ABANDONMENT.	B130	0.80	540.00
08/02/23	DDW	PREPARE FOR AND ATTEND CONFERENCE REGARDING REPORT AND RECOMMENDATION.	B130	0.40	270.00
08/03/23	DDW	REVIEW OF BANK STATEMENTS AND CONFERENCE REGARDING CALCULATION OF INTEREST.	B210	0.50	337.50
08/03/23	DDW	REVIEW AND REVISE PROPOSED LETTER REGARDING TIEP AND CONFERENCE REGARDING SAME.	B120	0.80	540.00
08/03/23	DDW	PREPARE FOR AND ATTEND CONFERENCE WITH SEC.	B110	0.60	405.00
08/03/23	DDW	CONFERENCE REGARDING POTENTIAL LITIGATION AND STRATEGIES REGARDING SAME.	BT160	0.50	337.50
08/03/23	DDW	CONFERENCE REGARDING CLAIMS PROCESS.	B310	0.40	270.00
08/03/23	DDW	REVIEW OF EXHIBITS TO BE OFFERED BY SPARKS AT RAILROAD COMMISSION HEARING.	B130	0.40	270.00
08/03/23	DDW	CONFERENCE REGARDING ELDORADO RANCH.	B130	0.30	202.50
08/04/23	DDW	CONFERENCE REGARDING RAILROAD COMMISSION HEARING ON TRANSFER OF P-4S.	B130	0.20	135.00
08/05/23	DDW	REVIEW OF PROPOSAL REGARDING ALLEGED ENVIRONMENTAL CLEANUP ISSUES AND APPROVE SAME.	B210	0.40	270.00
08/07/23	DDW	PREPARE FOR AND ATTEND CONFERENCE REGARDING RAILROAD COMMISSION, ALLEGED ENVIRONMENTAL ISSUES,	B210	0.80	540.00



DEBORAH D WILLIAMSON
DEBORAH WILLIAMSON

MATTER #: 122686.000001
INVOICE #: 3550509
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OCTOBER 30, 2023

DATE	ID	DESCRIPTION	TASK	HOURS	AMOUNT
		PAYMENTS AND OTHER OPERATIONAL ISSUES.			
08/07/23	DDW	REVIEW AND RESPOND TO UPDATES AND ISSUES RELATED TO AUCTION OF PERSONAL PROPERTY.	B130	0.40	270.00
08/07/23	DDW	REVIEW AND APPROVE EXTENSION OF TOLLING AGREEMENT.	BT160	0.30	202.50
08/08/23	DDW	CONFERENCE REGARDING ELECTRA CONTRACT.	B130	0.30	202.50
08/08/23	DDW	PREPARE FOR AND ATTEND TAX CONFERENCE WITH AHUJA & CLARK.	B240	0.80	540.00
08/08/23	DDW	CONFERENCE REGARDING DISCLOSURE OF INFORMATION PRIOR TO MEDIATION.	BT160	0.30	202.50
08/08/23	DDW	EXECUTE IRS FORM 940.	B240	0.20	135.00
08/08/23	DDW	ADDRESS INVESTOR INQUIRIES.	B110	0.30	202.50
08/09/23	DDW	REVIEW AND REVISE MEDIATION STATEMENT.	BT160	1.10	742.50
08/09/23	DDW	PREPARE FOR AND ATTEND CONFERENCE ON MEDIATION STATEMENT.	BT160	1.00	675.00
08/09/23	DDW	REVIEW AND RESPOND REGARDING INCREASED OFFER FOR REAL PROPERTY.	B130	0.50	337.50
08/10/23	DDW	CONFERENCE REGARDING MEDIATION.	BT160	0.30	202.50
08/10/23	DDW	MULTIPLE CONFERENCES AND EMAILS REGARDING INFORMATION TO BE DELIVERED PRIOR TO MEDIATION.	BT160	0.20	135.00
08/11/23	DDW	REVIEW AND RESPOND TO GULF COAST REGARDING PAYMENT.	B210	0.30	202.50
08/14/23	DDW	PREPARE FOR AND ATTEND CONFERENCE REGARDING OPERATIONS, RAILROAD COMMISSION AND OTHER ISSUES.	B210	0.70	472.50
08/14/23	DDW	REVIEW AND RESPOND TO UPDATE REGARDING COMPETING ELECTRA BID.	B130	0.30	202.50
08/14/23	DDW	TELEPHONE CONFERENCE WITH MR. HILLERMAN REGARDING POTENTIAL AGREEMENT WITH LANDOWNER TO P&A WELLS.	B210	0.40	270.00
08/14/23	DDW	REVIEW OF OPPOSING PARTY'S MEDIATION STATEMENT.	BT160	1.20	810.00
08/15/23	DDW	REVIEW OF FINAL DRAFT OF RECEIVER'S MEDIATION STATEMENT.	BT160	0.90	607.50
08/15/23	DDW	REVIEW OF WITHDRAWAL OF PROPOSED FINDINGS AND CONCLUSIONS OF LAW; DRAFT AND RESPOND TO EMAILS REGARDING SAME.	B130	0.80	540.00
08/15/23	DDW	REVIEW OF REVISED REPORT AND RECOMMENDATION.	B130	0.60	405.00
08/15/23	DDW	REVIEW AND RESPOND TO INVESTOR INQUIRIES.	B110	0.30	202.50



DEBORAH D WILLIAMSON
DEBORAH WILLIAMSON

MATTER #: 122686.000001
INVOICE #: 3550509
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DATE	ID	DESCRIPTION	TASK	HOURS	AMOUNT
08/15/23	DDW	REVIEW AND RESPOND TO UPDATES REGARDING TAX ISSUES.	B240	0.50	337.50
08/16/23	DDW	PREPARE FOR AND ATTEND CONFERENCE REGARDING MEDIATION.	BT160	0.50	337.50
08/16/23	DDW	REVIEW OF ADDITIONAL DEPOSITION TESTIMONY IN PREPARATION FOR MEDIATION.	BT160	0.70	472.50
08/16/23	DDW	APPROVE SEARCHES REGARDING ASSETS BY CANADIAN ENTITIES.	B120	0.30	202.50
08/16/23	DDW	PREPARE FOR AND ATTEND CONFERENCE WITH AHUJA AND CLARK REGARDING TIEP ANALYSIS.	B120	0.60	405.00
08/17/23	DDW	REVIEW OF PROPOSED AGREEMENT REGARDING ASSUMPTION OF P&A COSTS.	B210	0.40	270.00
08/17/23	DDW	PREPARE FOR MEDIATION INCLUDING EXHIBITS.	BT160	1.50	1,012.50
08/17/23	DDW	CONFERENCES REGARDING ISSUES RELATED TO CLAIMS PROCESS INCLUDING PROPOSED FORMS.	B310	0.80	540.00
08/17/23	DDW	REVIEW OF REPORT REGARDING VAL VERDE/CROCKETT OPERATIONS; DRAFT AND RESPOND TO EMAILS REGARDING SAME.	B210	0.50	337.50
08/17/23	DDW	REVIEW AND APPROVE PROPOSED EXHIBITS REGARDING 8/24 HEARINGS.	B130	0.40	270.00
08/18/23	DDW	PREPARE FOR AND ATTEND CONFERENCE WITH MEDIATION.	BT160	0.30	202.50
08/21/23	DDW	ATTEND PRE-MEDIATION MEETING.	BT160	1.50	1,012.50
08/21/23	DDW	BEGIN REVIEW OF CLAIMS ALLOWANCE MOTION.	B310	0.80	540.00
08/21/23	DDW	REVIEW AND APPROVE RELEASE OF ESCROW.	B130	0.30	202.50
08/22/23	DDW	ATTEND MEDIATION.	BT160	6.50	4,387.50
08/23/23	DDW	REVIEW AND REVISE PROPOSED MOTION REGARDING CLAIMS PROCESS; CONFERENCE REGARDING SAME.	B310	1.10	742.50
08/23/23	DDW	PREPARE FOR AND ATTEND HEARING ON DISPOSITION OF JEWELRY.	B130	0.50	337.50
08/23/23	DDW	PREPARE FOR AND ATTEND CONFERENCE REGARDING ELDORADO PROPERTY.	B130	0.40	270.00
08/25/23	DDW	PREPARE AND ATTEND CONFERENCE REGARDING PRODUCTION OF REQUESTED INFORMATION IN CONNECTION WITH MEDIATION.	BT160	1.00	675.00
08/25/23	DDW	PREPARE FOR AND ATTEND CONFERENCE WITH AHUJA AND CLARK REGARDING TAX ISSUES, ANALYSIS OF CLAIMS AND OTHER ISSUES.	B240	1.00	675.00



DEBORAH D WILLIAMSON
DEBORAH WILLIAMSON

MATTER #: 122686.000001
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DATE	ID	DESCRIPTION	TASK	HOURS	AMOUNT
08/28/23	DDW	REVIEW OF DRAFT DEMAND LETTER AND CONFERENCE REGARDING SAME.	B120	0.80	540.00
08/28/23	DDW	CONFERENCE WITH CHILD OF INVESTORS REGARDING TAX AND OTHER ISSUES.	B110	0.40	270.00
08/28/23	DDW	REVIEW OF INFORMATION REGARDING PRODUCTION IN CONNECTION WITH MEDIATION; DRAFT AND RESPOND TO EMAILS REGARDING SAME; CONFERENCES REGARDING SAME.	BT160	0.90	607.50
08/29/23	DDW	REVIEW OF RELEVANT DOCUMENTATION RELATED TO BAHAMAS DEMAND LETTER.	B120	0.50	337.50
08/29/23	DDW	REVIEW AND APPROVE PAYMENTS.	B210	0.40	270.00
08/29/23	DDW	REVIEW OF SOLVENCY ANALYSIS.	B120	0.50	337.50
08/29/23	DDW	CONFERENCE REGARDING BAHAMAS.	B120	0.40	270.00
08/30/23	DDW	REVIEW OF UPDATES REGARDING ENVIRONMENTAL CLEANUP AND OTHER ISSUES.	B210	0.60	405.00
08/30/23	DDW	REVIEW AND REVISE PROPOSED NOTICES AND PROCESS FOR CLAIMS OBJECTIONS AND ALLOWANCES; MULTIPLE CONFERENCES REGARDING SAME.	B310	2.10	1,417.50
08/31/23	DDW	MULTIPLE CONFERENCES REGARDING FORMS FOR PROOFS OF CLAIM; FORMS FOR NOTICES TO INVESTORS AND CLAIMANTS AND PUBLICATION NOTICES; REVIEW AND REVISE EACH.	B310	2.30	1,552.50
08/31/23	DDW	REVIEW AND REVISE PROPOSED MOTION REGARDING CLAIMS PROCESS; MULTIPLE CONFERENCES REGARDING SAME.	B310	1.60	1,080.00
TOTAL				51.40	\$34,695.00



DEBORAH D WILLIAMSON
DEBORAH WILLIAMSON

MATTER #: 122686.000001
INVOICE #: 3550509
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BILLING SUMMARY

ID	TIMEKEEPER	TITLE	HOURS	RATE	AMOUNT
DDW	DEBORAH WILLIAMSON	MEMBER	51.40	675.00	34,695.00
	TOTAL		51.40		\$34,695.00



DEBORAH D WILLIAMSON
DEBORAH WILLIAMSON

MATTER #: 122686.000001
INVOICE #: 3550509
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OCTOBER 30, 2023

TASK SUMMARY

TASK	TASK DESCRIPTION	HOURS	AMOUNT
B110	CASE ADMINISTRATION	1.60	1,080.00
B120	ASSET ANALYSIS AND RECOVERY	4.80	3,240.00
B130	ASSET DISPOSITION	7.40	4,995.00
B210	BUSINESS OPERATIONS	5.40	3,645.00
B240	TAX ISSUES	2.50	1,687.50
B310	CLAIMS ADMINISTRATION & OBJECT	9.10	6,142.50
BT160	LITIGATION CONSULTING	20.60	13,905.00
	TOTAL	51.40	34,695.00



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

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

DUE UPON RECEIPT

OCTOBER 30, 2023
MATTER #: 122686.000001
INVOICE #: 3550508

FOR PROFESSIONAL SERVICES RENDERED

RE: RECEIVER'S TIME

FEES	\$	30,037.50
INVOICE TOTAL	\$	30,037.50



DEBORAH D WILLIAMSON
DEBORAH WILLIAMSON

MATTER #: 122686.000001
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OCTOBER 30, 2023

RE: RECEIVER'S TIME

DATE	ID	DESCRIPTION	TASK	HOURS	AMOUNT
09/01/23	DDW	DRAFT AND RESPOND TO EMAILS REGARDING PRE-SUIT DISCOVERY AND MEDIATION PROCESS.	BT160	0.50	337.50
09/05/23	DDW	PREPARE FOR AND ATTEND CONFERENCE WITH AHUJA & CLARK AND STRETTO REGARDING CLAIMS PROCESS, PROPOSED PLEADINGS AND LOGISTICS.	B310	1.20	810.00
09/05/23	DDW	REVIEW OF ORDER FROM JUDGE O'CONNOR REGARDING ABANDONMENT MOTIONS.	B130	0.30	202.50
09/05/23	DDW	CONFERENCES AND EMAILS REGARDING ABANDONMENT PROCESS, NOTICE ISSUES AND PROPOSED ORDERS.	B130	1.20	810.00
09/05/23	DDW	PREPARE FOR AND ATTEND CONFERENCE WITH A&C REGARDING DYED DIESEL TAXES AND OTHER TAX ISSUES; REVIEW AND RESPOND TO EMAILS REGARDING SAME.	B240	0.90	607.50
09/05/23	DDW	APPROVE PAYMENTS.	B210	0.40	270.00
09/05/23	DDW	CONFERENCES AND EMAILS REGARDING LOGISTICS OF CLAIMS PROCESS.	B310	0.70	472.50
09/06/23	DDW	REVIEW AND REVISE PLEADINGS REGARDING CLAIMS PROCESS; OFFICE CONFERENCES AND EMAILS REGARDING SAME.	B310	1.90	1,282.50
09/06/23	DDW	REVIEW AND EXECUTE TAX FORMS.	B240	0.30	202.50
09/06/23	DDW	REVIEW AND APPROVE PAYMENTS.	B210	0.20	135.00
09/06/23	DDW	REVIEW OF IRS LETTER REGARDING TAX LIEN.	B240	0.20	135.00
09/07/23	DDW	DRAFT AND RESPOND TO MULTIPLE EMAILS REGARDING CLAIMS PROCESS AND PLEADINGS.	B310	0.90	607.50
09/07/23	DDW	REVIEW AND RESPOND TO EMAILS REGARDING ENVIRONMENTAL ISSUES INCLUDING NOTIFICATION TO THE TEXAS RAILROAD COMMISSION REGARDING ELECTRICITY DISCONNECT.	B210	0.40	270.00
09/07/23	DDW	REVIEW AND REVISE PROPOSED AGREEMENT REGARDING PLUGGING; DRAFT AND RESPOND TO EMAILS REGARDING SAME.	B130	0.40	270.00
09/08/23	DDW	CONFERENCES AND EMAILS WITH MS. BEHREND'S REGARDING CLAIMS MOTION INCLUDING REVIEW OF EXHIBITS AND OTHER EDITS.	B310	1.10	742.50
09/11/23	DDW	REVIEW AND APPROVE PAYMENTS.	B210	0.40	270.00



DEBORAH D WILLIAMSON
DEBORAH WILLIAMSON

MATTER #: 122686.000001
INVOICE #: 3550508
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OCTOBER 30, 2023

DATE	ID	DESCRIPTION	TASK	HOURS	AMOUNT
09/11/23	DDW	MULTIPLE CONFERENCES REGARDING REVISIONS TO CLAIMS MOTION AND FINAL APPROVAL OF MOTION AND PROPOSED ORDER.	B310	1.70	1,147.50
09/11/23	DDW	REVIEW AND APPROVE REVISED PLUGGING AGREEMENTS.	B130	0.40	270.00
09/12/23	DDW	REVIEW AND REVISE DEMAND LETTERS REGARDING BAHAMAS DEEDS AND REVENUE PROPERTY; CONFERENCES REGARDING SAME.	B120	1.40	945.00
09/12/23	DDW	REVIEW FORM OF DEED FOR ELECTRA; DRAFT AND RESPOND TO EMAILS REGARDING SAME; EXECUTE SAME.	B130	0.50	337.50
09/12/23	DDW	APPROVE PAYMENTS.	B210	0.40	270.00
09/12/23	DDW	PREPARE FOR AND ATTEND CONFERENCES REGARDING REVISED DALLAS RESOURCES TAX RETURN INCLUDING REVIEW OF DRAFT RETURN.	B240	1.50	1,012.50
09/12/23	DDW	REVIEW AND EXECUTE PLUGGING AGREEMENT.	B130	0.20	135.00
09/13/23	DDW	REVIEW OF INFORMATION REGARDING CLAIMS CALCULATION AND PROCESS.	B310	0.40	270.00
09/13/23	DDW	REVIEW OF "SAMPLE" DOCUMENTS FOR MAIL OUT ON CLAIMS PROCESS.	B310	0.40	270.00
09/13/23	DDW	CONFERENCES REGARDING INVESTOR INQUIRIES REGARDING CLAIMS PROCESS.	B110	0.40	270.00
09/13/23	DDW	CONFERENCE REGARDING CLAIMS FORMS AND INFORMATION.	B310	0.40	270.00
09/13/23	DDW	ANALYSIS OF POTENTIAL CLAIMS, CAUSES OF ACTION AND COUNSEL.	BT160	1.10	742.50
09/13/23	DDW	REVIEW AND APPROVE PAYMENTS.	B210	0.20	135.00
09/14/23	DDW	REVIEW AND EXECUTE TOLLING AGREEMENT.	BT160	0.30	202.50
09/14/23	DDW	PREPARE FOR AND ATTEND CONFERENCE REGARDING POTENTIAL LITIGATION CLAIMS AND STATUS OF PENDING CLAIMS.	BT160	1.00	675.00
09/14/23	DDW	REVIEW AND EXECUTE AMENDED RETURN FOR DALLAS RESOURCES.	B240	0.50	337.50
09/14/23	DDW	CONFERENCE REGARDING PAYMENT OF TAXES FOR DALLAS RESOURCES.	B240	0.20	135.00
09/14/23	DDW	CONFERENCE REGARDING INVESTOR CALLS RELATED TO CLAIMS MOTION.	B110	0.40	270.00
09/14/23	DDW	ADDRESS RAILROAD COMMISSION NOTICES REGARDING SWD AND CURRENT STATUS.	B210	0.30	202.50



DEBORAH D WILLIAMSON
DEBORAH WILLIAMSON

MATTER #: 122686.000001
INVOICE #: 3550508
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OCTOBER 30, 2023

DATE	ID	DESCRIPTION	TASK	HOURS	AMOUNT
09/14/23	DDW	PREPARE FOR AND ATTEND CONFERENCE WITH AJUHA AND CLARK REGARDING CLAIMS ANALYSIS.	B310	1.10	742.50
09/14/23	DDW	OUTLINE PROCESS AND ISSUES FOR ABANDONMENT OF PROPERTIES.	B130	1.10	742.50
09/15/23	DDW	REVIEW OF DEMAND FROM TEXAS RAILROAD COMMISSION; DRAFT AND RESPOND TO EMAILS REGARDING SAME.	B210	0.80	540.00
09/15/23	DDW	REVIEW OF DEMAND FROM COUNSEL FOR BOB HUGHES; DRAFT AND RESPOND TO EMAILS REGARDING SAME.	B130	0.40	270.00
09/15/23	DDW	REVIEW AND RESPOND TO EMAILS REGARDING DALLAS RESOURCES TAX PAYMENT.	B240	0.40	270.00
09/15/23	DDW	REVIEW AND RESPOND TO INFORMATION REQUESTS RELATED TO PLUGGING AGREEMENTS.	B130	0.30	202.50
09/15/23	DDW	REVIEW AND RESPOND TO UPDATE REGARDING MEDIATION.	BT160	0.20	135.00
09/18/23	DDW	PREPARE FOR AND ATTEND CONFERENCE REGARDING TEXAS RAILROAD COMMISSION DEMANDS, BOB HUGHES DEMANDS, ABANDONMENT, VAL VERDE/CROCKETT AND OTHER ISSUES.	B130	1.50	1,012.50
09/18/23	DDW	CONFERENCES REGARDING TIEP DEMAND LETTERS, CLAIMS AND NEXT STEPS.	BT160	0.90	607.50
09/18/23	DDW	APPROVE PAYMENTS.	B210	0.10	67.50
09/18/23	DDW	CONFERENCES REGARDING TIEP DEMAND LETTERS AND CLAIMS.	BT160	1.20	810.00
09/18/23	DDW	CONFERENCE REGARDING INVESTOR INQUIRIES AND OUTLINE OF RESPONSES.	B110	0.60	405.00
09/18/23	DDW	REVIEW OF UPDATE ON STATUS OF P-5S AND OTHER RELATED ISSUES.	B210	0.30	202.50
09/19/23	DDW	MULTIPLE EMAILS REGARDING INVESTOR INQUIRIES.	B110	0.80	540.00
09/20/23	DDW	REVIEW AND APPROVE PAYMENTS.	B210	0.40	270.00
09/20/23	DDW	CONFERENCE REGARDING ROYALTY PAYMENTS IN "SUSPENSE" AND RELATED ISSUES.	B210	0.60	405.00
09/20/23	DDW	REVIEW AND RESPOND TO ISSUES RELATED TO "CANCELLED" PAYMENTS AND INVESTOR CLAIMS.	B310	0.40	270.00
09/20/23	DDW	CONFERENCES WITH CREDITORS AND INVESTORS REGARDING CLAIMS PROCESS.	B110	0.70	472.50
09/20/23	DDW	REVIEW OF UPDATE REGARDING VAL VERDE/CROCKETT; DRAFT AND RESPOND TO EMAILS REGARDING SAME.	B210	0.60	405.00
09/22/23	DDW	CONFERENCES AND EMAILS REGARDING LEAK IN THE AREA OF	B210	0.70	472.50



DEBORAH D WILLIAMSON
DEBORAH WILLIAMSON

MATTER #: 122686.000001
INVOICE #: 3550508
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DATE	ID	DESCRIPTION	TASK	HOURS	AMOUNT
		THE C. B. LONG PIPELINE.			
09/22/23	DDW	REVIEW AND APPROVE COMMUNICATIONS AND PAYMENTS PROCESS FOR ROYALTY OWNERS WITH FUNDS IN SUSPENSE.	B210	0.40	270.00
09/25/23	DDW	REVIEW AND APPROVE DRAFT RESPONSE TO INVESTORS.	B110	0.90	607.50
09/25/23	DDW	REVIEW AND APPROVE PAYMENTS.	B210	0.70	472.50
09/25/23	DDW	CONFERENCES AND EMAILS REGARDING CLAIMS ANALYSIS.	B310	0.50	337.50
09/25/23	DDW	PREPARE FOR AND ATTEND MEETING REGARDING ABANDONMENT PROCESS AND OTHER OPERATIONAL ISSUES.	B130	0.50	337.50
09/25/23	DDW	REVIEW AND EXECUTE DOCUMENTS REGARDING ELECTRA SALE.	B130	0.80	540.00
09/26/23	DDW	REVIEW AND REVISE LETTER TO ROYALTY OWNERS REGARDING "FINAL" PAYMENT FROM ANY RECEIVERSHIP PARTY.	B210	0.60	405.00
09/26/23	DDW	REVIEW AND REVISE COMMUNICATIONS WITH INVESTORS; CONFERENCES REGARDING SAME.	B110	0.80	540.00
09/26/23	DDW	REVIEW AND REVISE PROPOSED NOTICE OF ABANDONMENT AND CONFERENCES REGARDING SAME.	B130	1.30	877.50
09/26/23	DDW	CONFERENCE REGARDING ELECTRA SALE.	B130	0.50	337.50
09/27/23	DDW	CONFERENCES REGARDING POTENTIAL EFFECT OF GOVERNMENT SHUTDOWN AND SEC FILINGS.	B110	0.40	270.00
09/28/23	DDW	CONFERENCES AND EMAILS REGARDING OPERATIONS, ABANDONMENT AND OTHER ISSUES.	B130	0.30	202.50
09/28/23	DDW	MULTIPLE CONFERENCES AND EMAILS REGARDING CLOSING ON SALE OF ELECTRA.	B130	0.40	270.00
09/29/23	DDW	REVIEW AND RESPOND TO CONFERENCES AND EMAILS REGARDING OPERATIONS INCLUDING ABANDONMENT AND RELATED ISSUES.	B130	0.60	405.00
		TOTAL		44.50	\$30,037.50



DEBORAH D WILLIAMSON
DEBORAH WILLIAMSON

MATTER #: 122686.000001
INVOICE #: 3550508
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OCTOBER 30, 2023

BILLING SUMMARY

ID	TIMEKEEPER	TITLE	HOURS	RATE	AMOUNT
DDW	DEBORAH WILLIAMSON	MEMBER	44.50	675.00	30,037.50
	TOTAL		44.50		\$30,037.50



DEBORAH D WILLIAMSON
DEBORAH WILLIAMSON

MATTER #: 122686.000001
INVOICE #: 3550508
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TASK SUMMARY

TASK	TASK DESCRIPTION	HOURS	AMOUNT
B110	CASE ADMINISTRATION	5.00	3,375.00
B120	ASSET ANALYSIS AND RECOVERY	1.40	945.00
B130	ASSET DISPOSITION	10.70	7,222.50
B210	BUSINESS OPERATIONS	7.50	5,062.50
B240	TAX ISSUES	4.00	2,700.00
B310	CLAIMS ADMINISTRATION & OBJECT	10.70	7,222.50
BT160	LITIGATION CONSULTING	5.20	3,510.00
	TOTAL	44.50	30,037.50



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

DUE UPON RECEIPT

OCTOBER 30, 2023
MATTER #: 122686.000004
INVOICE #: 3550501

FOR PROFESSIONAL SERVICES RENDERED

RE: RECEIVER'S TRAVEL TIME

FEES	\$	1,822.50
INVOICE TOTAL	\$	1,822.50



DEBORAH D WILLIAMSON
DEBORAH WILLIAMSON

MATTER #: 122686.000004
INVOICE #: 3550501
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OCTOBER 30, 2023

RE: RECEIVER'S TRAVEL TIME

DATE	ID	DESCRIPTION	TASK	HOURS	AMOUNT
08/21/23	DDW	TRAVEL TO DALLAS FOR MEDIATION (TIME REDUCED RELATED TO OTHER CLIENTS).	B110	3.20	1,080.00
08/22/23	DDW	RETURN TO SAN ANTONIO (TIME REDUCED RELATED TO OTHER CLIENTS).	B110	2.20	742.50
		TOTAL		5.40	\$1,822.50



DEBORAH D WILLIAMSON
DEBORAH WILLIAMSON

MATTER #: 122686.000004
INVOICE #: 3550501
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OCTOBER 30, 2023

BILLING SUMMARY

ID	TIMEKEEPER	TITLE	HOURS	RATE	AMOUNT
DDW	DEBORAH WILLIAMSON	MEMBER	5.40	337.50	1,822.50
	TOTAL		5.40		\$1,822.50



DEBORAH D WILLIAMSON
DEBORAH WILLIAMSON

MATTER #: 122686.000004
INVOICE #: 3550501
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OCTOBER 30, 2023

TASK SUMMARY

TASK	TASK DESCRIPTION	HOURS	AMOUNT
B110	CASE ADMINISTRATION	5.40	1,822.50
	TOTAL	5.40	1,822.50



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

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

DUE UPON RECEIPT

OCTOBER 30, 2023
MATTER #: 122686.000002
INVOICE #: 3550507

FOR PROFESSIONAL SERVICES RENDERED

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

FEES	\$	39,392.00
DISBURSEMENTS		6,790.20
INVOICE TOTAL	\$	46,182.20



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OCTOBER 30, 2023

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

DATE	ID	DESCRIPTION	TASK	HOURS	AMOUNT
07/01/23	DNR	CORRESPONDENCE WITH DARRELL R. JONES REGARDING FARMOUT EXPENSES AND REVENUE ISSUES.	B210	0.30	105.00
07/05/23	DNR	RECEIVE AND REVIEW JUNE STATEMENTS FROM IBC BANK; SEND TO AHUJA & CLARK.	B210	0.30	105.00
07/05/23	DNR	CORRESPONDENCE FROM VICKI PALMOUR CONSULTING REGARDING WAGES REPORTS FOR ARCOOIL AND BARRON PETROLEUM FOR 4Q2021; REVIEW REPORTS.	B210	0.20	70.00
07/05/23	DNR	CORRESPONDENCE TO GENERAL LAND OFFICE REGARDING REQUEST FOR LEASE DOCUMENTS REGARDING PURPORTED OUTSTANDING REPORTS.	B210	0.10	35.00
07/05/23	DNR	CORRESPONDENCE WITH DEFENDANTS' COUNSEL REGARDING WITHDRAWAL OF REPRESENTATION AND NOTICING ADDRESSES.	B110	0.20	70.00
07/05/23	DNR	REPORT FOR COMPLIANCE CALL WITH TEAM.	B210	1.00	350.00
07/05/23	DNR	CORRESPONDENCE TO AUCTIONEER REGARDING INDIAN STYLE JEWELRY UPDATE REQUEST FROM GEMOLOGIST.	B120	0.10	35.00
07/05/23	DNR	REVISE, FINALIZE, AND FILE NOTICE OF EXTENSION OF CLOSING DATE FOR PERSONAL PROPERTY AUCTION.	B130	0.20	70.00
07/05/23	DNR	REPORT FOR CALL WITH DEBORAH D. WILLIAMSON AND REID COLLINS REGARDING OPPOSING COUNSEL'S DOCUMENT REQUESTS PRIOR TO MEDIATION.	BT160	0.70	245.00
07/05/23	DNR	MULTIPLE EMAILS TO REID COLLINS REGARDING DOCUMENTS REQUESTED BY OPPOSING COUNSEL.	BT160	0.40	140.00
07/05/23	DNR	REVIEW AND RESPOND TO INVESTOR INQUIRIES.	B110	0.20	70.00
07/05/23	TED	ADDRESS INVESTOR INQUIRIES.	B110	0.10	25.65
07/05/23	DNR	CORRESPONDENCE WITH SEC COUNSEL REGARDING RESPONSE TO BAHAMAS DOCUMENT REQUEST LETTER.	B120	0.20	70.00
07/05/23	DNR	CORRESPONDENCE WITH VICKI PALMOUR CONSULTING REGARDING UPCOMING QUARTERLY REPORT.	BT155	0.10	35.00
07/05/23	DNR	CORRESPONDENCE TO GULF COAST REGARDING PRODUCTION PAYMENT AND FUNDS TO RECEIVER.	B210	0.10	35.00
07/05/23	DNR	CORRESPONDENCE WITH BROKER REGARDING STATUS OF COUNTEROFFERS FOR ELECTRA.	B130	0.20	70.00



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DATE	ID	DESCRIPTION	TASK	HOURS	AMOUNT
07/05/23	DNR	CONFERENCE REGARDING TAX AND ACCOUNTING ISSUES WITH AHUJA & CLARK AND DEBORAH D. WILLIAMSON.	B240	0.90	315.00
07/05/23	DNR	CORRESPONDENCE FROM RAILROAD COMMISSION REGARDING ORDER OF DISMISSAL OF GOOD FAITH CLAIM DOCKETS; REVIEW SAME; SEND SAME TO COMPLIANCE TEAM.	B130	0.20	70.00
07/05/23	MDWO	CONTINUE EDITING THE SEVENTH QUARTERLY REPORT.	BT155	1.00	333.00
07/05/23	DNR	RECEIVE AND PROCESS RECEIVER'S MAIL.	B210	0.60	210.00
07/05/23	DNR	CORRESPONDENCE TO AHUJA & CLARK REGARDING IRS MAIL RECEIVED.	B240	0.10	35.00
07/05/23	DNR	CORRESPONDENCE TO COMPLIANCE TEAM REGARDING RAILROAD COMMISSION MAIL RECEIVED.	B210	0.10	35.00
07/05/23	DNR	CORRESPONDENCE TO VICKI PALMOUR CONSULTING REGARDING ROYALTY OWNER CORRESPONDENCE AND ADDRESS REQUEST.	B210	0.10	35.00
07/05/23	DNR	TELEPHONE CONFERENCE WITH CITY OF ELECTRA REGARDING STATEMENT.	B210	0.10	35.00
07/05/23	DNR	CORRESPONDENCE WITH DEBORAH D. WILLIAMSON REGARDING DEPARTMENT OF TRANSPORTATION RENEWAL.	B210	0.20	70.00
07/05/23	DNR	CORRESPONDENCE WITH CONTRACT OPERATOR REGARDING RECORDED DOCUMENTS AND ENERGYNET WIRE.	B130	0.20	70.00
07/05/23	DNR	CORRESPONDENCE WITH VICKI PALMOUR CONSULTING REGARDING PLUG LIST.	B210	0.20	70.00
07/05/23	DNR	RECEIVE AND REVIEW JUNE STATEMENT FROM WESTERN ALLIANCE BANK; SEND TO AHUJA & CLARK.	B210	0.20	70.00
07/05/23	DNR	CORRESPONDENCE WITH CONTRACT OPERATOR REGARDING ENVIRONMENTAL NOTICES AND RAILROAD COMMISSION ISSUES.	B210	0.30	105.00
07/06/23	TED	ADDRESS INVESTOR INQUIRIES.	B110	0.20	51.30
07/06/23	DNR	TELEPHONE CONFERENCE WITH CITY OF ELECTRA REGARDING PROCESSING OF RECEIVER'S UTILITY BILL.	B210	0.10	35.00
07/06/23	DNR	TELEPHONE CONFERENCE WITH US DEPARTMENT OF TRANSPORTATION REGARDING RENEWAL FOR FORM MCS-150 AND RECEIVERSHIP ORDER.	B210	0.20	70.00
07/06/23	DNR	CORRESPONDENCE FROM GENERAL LAND OFFICE REGARDING PRODUCTION REPORTS; REVIEW INFORMATION FROM GENERAL LAND OFFICE REGARDING LEASES; CORRESPONDENCE WITH COMPLIANCE TEAM REGARDING	B210	0.40	140.00



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DEBORAH WILLIAMSON

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DATE	ID	DESCRIPTION	TASK	HOURS	AMOUNT
		SAME.			
07/06/23	DNR	PREPARE AND PROCESS US DEPARTMENT OF TRANSPORTATION FORM MCS-150 AND COMPILE EXHIBITS FOR SUPPORT RE RECEIVERSHIP FOR SAME; DISCUSS WITH DEBORAH D. WILLIAMSON AND SUBMIT TO US DEPARTMENT OF TRANSPORTATION FOR PROCESSING.	B210	0.70	245.00
07/06/23	DNR	CORRESPONDENCE WITH ENERGYNET REGARDING WIRING AND CLOSING ITEMS ON JACK AND YOUNG COUNTIES.	B130	0.20	70.00
07/06/23	DNR	CORRESPONDENCE WITH CONTRACT OPERATOR RE REFRIGERATED TRUCK SOLD AND ELECTRA PROPERTY.	B130	0.20	70.00
07/06/23	DNR	RECEIVE CLOSING DOCUMENTS FROM ENERGYNET FOR JACK AND YOUNG COUNTIES.	B130	0.10	35.00
07/06/23	DNR	DRAFT LETTER TO COMPTROLLER REGARDING RECORDS REQUEST FOR BARRON PETROLEUM.	B210	0.40	140.00
07/06/23	DNR	TELEPHONE CONFERENCE WITH COMPTROLLER COUNSEL REGARDING OUTSTANDING REPORTS AND RECORDS REQUEST OF RECEIVER; SUBSEQUENT CORRESPONDENCE AT COMPTROLLER'S DIRECTION.	B210	0.30	105.00
07/06/23	DNR	DISCUSS CALL WITH COMPTROLLER AND FUEL REPORTING ISSUES OUTSTANDING WITH DEBORAH D. WILLIAMSON.	B210	0.10	35.00
07/06/23	DNR	DRAFT CORRESPONDENCE TO ROGER SAHOTA RE DIESEL FUEL TAX REPORTING AND LICENSURE OF BARRON PETROLEUM.	B210	0.20	70.00
07/06/23	DNR	REVIEW MATERIALS FROM IRS APPEALS OFFICER IN PREPARATION FOR DUE PROCESS HEARING.	B240	0.60	210.00
07/06/23	DNR	CORRESPONDENCE TO AHUJA & CLARK REGARDING COMPTROLLER CONTACT AND COUNSEL ITEMS.	B210	0.10	35.00
07/06/23	DNR	TELEPHONE CONFERENCE WITH CONTRACT OPERATOR REGARDING GENERAL LAND OFFICE LEASE AND REPORT ITEMS.	B210	0.10	35.00
07/06/23	DNR	CORRESPONDENCE WITH COMPTROLLER COUNSEL REGARDING DIESEL FUEL APPLICATION AND 2019 TAX REPORT FOR BARRON PETROLEUM; REVIEW MATERIALS REGARDING SAME; SEND TO AHUJA & CLARK.	B210	0.30	105.00
07/06/23	DNR	CORRESPONDENCE TO VICKI PALMOUR CONSULTING REGARDING WOLFEPAK RECORDS SEARCH REQUEST.	B210	0.10	35.00
07/06/23	DNR	RECEIVE AND REVIEW TAX DOCUMENTS SENT TO SAHOTA FAMILY BY AHUJA & CLARK FOR TAX YEARS 2021 AND 2022.	B240	0.20	70.00
07/07/23	DNR	APPEAR ON BEHALF OF RECEIVER FOR BARRON PETROLEUM FOR DUE PROCESS HEARING WITH IRS.	B240	0.50	175.00



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DATE	ID	DESCRIPTION	TASK	HOURS	AMOUNT
07/07/23	DNR	CALL WITH AHUJA & CLARK BEFORE DUE PROCESS HEARING WITH IRS.	B240	0.10	35.00
07/07/23	DNR	CALL WITH DEBORAH D. WILLIAMSON AND SEC COUNSEL REGARDING CASE STATUS AND UPDATE ITEMS.	B110	0.60	210.00
07/07/23	DNR	CALL WITH DEBORAH D. WILLIAMSON AND AHUJA & CLARK REGARDING POST-DUE PROCESS IRS HEARING UPDATE REGARDING BARRON PETROLEUM.	B240	0.40	140.00
07/07/23	DNR	REVIEW DATABASE FOR RECORDS REQUESTED BY OPPOSING COUNSEL.	BT160	0.40	140.00
07/07/23	DNR	CORRESPONDENCE WITH CONTRACT OPERATOR AND OIL AND GAS COUNSEL REGARDING QUARTERLY REPORT AND CONTENT ITEMS FOR SAME.	BT155	0.50	175.00
07/07/23	DNR	CORRESPONDENCE WITH VICKI PALMOUR CONSULTING AND AHUJA & CLARK REGARDING DIESEL TAX AND FUEL PURCHASES PRE-RECEIVERSHIP; REVIEW WOLFEPAK REPORTS REGARDING SAME.	B210	0.30	105.00
07/07/23	DNR	CORRESPONDENCE WITH REID COLLINS REGARDING OPPOSING COUNSEL'S RECORD REQUESTS.	BT160	0.20	70.00
07/07/23	DNR	CORRESPONDENCE TO CONTRACT OPERATOR AND DEBORAH D. WILLIAMSON REGARDING WIRE RECEIVED FOR JACK AND YOUNG COUNTIES SALE.	B130	0.10	35.00
07/07/23	DNR	CORRESPONDENCE WITH DEBORAH D. WILLIAMSON REGARDING BAHAMIAN REAL ESTATE PROPERTY SEARCH AND VENDORS FOR SAME.	B120	0.40	140.00
07/07/23	DNR	RESEARCH BAHAMIAN TITLE SEARCH VENDORS FOR REAL ESTATE ANALYSIS.	B120	0.40	140.00
07/07/23	DNR	DRAFT AND SEND TO IRS APPEALS OFFICER BARRON PETROLEUM PAYROLL FORMS, RECEIVERSHIP ORDER, AND DUE PROCESS HEARING REQUEST FOR FEDERAL TAX LIEN.	B240	0.20	70.00
07/07/23	DNR	RESEARCH DATABASE FOR PRE-RECEIVERSHIP OWNERSHIP AND RELATED DOCUMENTS RELATING TO AIRPLANE.	B120	0.60	210.00
07/07/23	DNR	CORRESPONDENCE TO SEC COUNSEL REGARDING DALLAS RESOURCES AND AIRPLANE TAX ITEMS.	B120	0.20	70.00
07/10/23	TED	ADDRESS INVESTOR INQUIRIES.	B110	0.20	51.30
07/10/23	DNR	REVIEW AND RESPOND TO INVESTOR INQUIRIES.	B110	0.20	70.00
07/10/23	DNR	REPORT FOR COMPLIANCE CALL WITH TEAM.	B210	0.50	175.00
07/10/23	DNR	CORRESPONDENCE WITH CUBESMART COUNSEL REGARDING	B110	0.50	175.00



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DEBORAH WILLIAMSON

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DATE	ID	DESCRIPTION	TASK	HOURS	AMOUNT
		ABANDONED STORAGE UNIT ITEMS AND CLAIMS PROCESS.			
07/10/23	DNR	DISCUSS WITH DEBORAH D. WILLIAMSON ABANDONMENT ISSUES PRESENTED BY CUBESMART.	B130	0.30	105.00
07/10/23	DNR	CONTACT TWO BAHAMIAN REAL ESTATE RECORD VENDORS AND REQUEST PRICING FOR SERVICES.	B120	0.20	70.00
07/10/23	DNR	CORRESPONDENCE TO BROKER REGARDING ELDORADO LISTING PRICE AND PHOTOS.	B130	0.10	35.00
07/10/23	DNR	CORRESPONDENCE WITH STRETTO AND DEBORAH D. WILLIAMSON REGARDING CLAIMS CALL AND PROCESS DISCUSSION.	B310	0.30	105.00
07/10/23	DNR	CORRESPONDENCE WITH AHUJA & CLARK AND VICKI PALMOUR CONSULTING REGARDING DIESEL FUEL REPORTING AND TAXES OUTSTANDING PER COMPTROLLER.	B210	0.20	70.00
07/10/23	DNR	PREPARE AND PROCESS WIRE FOR DATA HOSTING PORTAL FOR JULY 2023; CORRESPONDENCE WITH DEBORAH D. WILLIAMSON REGARDING SAME.	B210	0.20	70.00
07/10/23	DNR	TELEPHONE CONFERENCE WITH CUBESMART COUNSEL REGARDING ABANDONMENT FORM AND JAMES IKEY STORAGE UNIT ISSUES.	B130	0.20	70.00
07/10/23	DNR	DRAFT CORRESPONDENCE FOR ABANDONMENT AND RELINQUISHMENT OF RECEIVERSHIP ENTITY INTEREST REGARDING CUBESMART PERSONAL PROPERTY.	B130	0.10	35.00
07/10/23	DNR	CORRESPONDENCE WITH REID COLLINS REGARDING DOCUMENT REQUEST OF OPPOSING COUNSEL.	BT160	0.20	70.00
07/10/23	DNR	REVIEW RAILROAD COMMISSION MAIL AND DIRECT TO COMPLIANCE TEAM.	B210	0.10	35.00
07/10/23	DNR	RECEIVE AND PROCESS RECEIVER'S MAIL.	B210	0.50	175.00
07/10/23	DNR	TELEPHONE CONFERENCE WITH AUCTIONEER REGARDING PERSONAL PROPERTY RESERVE VALUES.	B130	0.10	35.00
07/10/23	DNR	CORRESPONDENCE TO YAIR BARAHONA REGARDING DATA HOSTING FEE FOR JULY 2023.	B210	0.10	35.00
07/10/23	DNR	TELEPHONE CONFERENCE WITH REID COLLINS REGARDING DOCUMENT REQUEST OF OPPOSING COUNSEL AND RESPONSE TO SAME.	BT160	0.30	105.00
07/10/23	DNR	DISCUSS ADDITIONAL DOCUMENT REQUEST ITEMS OF OPPOSING COUNSEL WITH DEBORAH D. WILLIAMSON.	BT160	0.20	70.00
07/10/23	DNR	CORRESPONDENCE WITH REID COLLINS REGARDING	BT160	0.20	70.00



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DEBORAH WILLIAMSON

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DATE	ID	DESCRIPTION	TASK	HOURS	AMOUNT
		DOCUMENT REQUESTS OF OPPOSING COUNSEL.			
07/10/23	MDWO	CONTINUE DRAFTING THE SEVENTH QUARTERLY REPORT.	BT155	3.00	999.00
07/11/23	DNR	CORRESPONDENCE AND TELEPHONE CONFERENCE WITH AUCTIONEER REGARDING VALUE RANGES FOR PERSONAL PROPERTY.	B130	0.20	70.00
07/11/23	DNR	TELEPHONE CONFERENCE WITH INVESTOR REGARDING FINANCIAL ADVISOR AND INVESTMENT INQUIRIES.	B110	0.50	175.00
07/11/23	DNR	TELEPHONE CONFERENCE WITH SEC COUNSEL REGARDING INVESTOR INQUIRY; CORRESPONDENCE TO SEC REGARDING INFORMATION ON SAME.	B110	0.30	105.00
07/11/23	DNR	CORRESPONDENCE WITH INVESTOR REGARDING FINANCIAL ADVISOR COMPLAINT.	B110	0.10	35.00
07/11/23	DNR	CORRESPONDENCE WITH COMPUTITLE WITH REAL PROPERTY SEARCH OPTIONS AND COST FOR EVALUATION BY RECEIVER.	B120	0.60	210.00
07/11/23	DNR	DISCUSS REAL PROPERTY SEARCH OPTIONS WITH DEBORAH D. WILLIAMSON FOR BAHAMAS.	B120	0.20	70.00
07/11/23	DNR	CALL WITH DEBORAH D. WILLIAMSON AND STRETTO REGARDING CLAIMS PROCESS AND NOTICING ITEMS.	B310	0.60	210.00
07/11/23	DNR	RECEIVE AND REVIEW GULF COAST JUNE 2023 STATEMENT FOR SUTTON; SEND TO COMPLIANCE TEAM.	B210	0.20	70.00
07/11/23	DNR	CORRESPONDENCE WITH GULF COAST AND CONTRACT OPERATOR REGARDING PRE-RECEIVERSHIP NATURAL GAS STATEMENTS.	B210	0.20	70.00
07/11/23	MDWO	REVISED SEVENTH QUARTERLY REPORT.	BT155	1.00	333.00
07/11/23	DNR	TELEPHONE CONFERENCE WITH REID COLLINS RE ADDITIONAL DOCUMENT REQUESTS FROM OPPOSING COUNSEL.	BT160	0.40	140.00
07/11/23	DNR	REVIEW AND RESPOND TO INVESTOR INQUIRIES.	B110	0.40	140.00
07/11/23	DNR	CORRESPONDENCE WITH DARRELL R. JONES REGARDING FARMOUT UPDATE.	B130	0.20	70.00
07/11/23	DNR	RECEIVE AND PROCESS RECEIVER'S MAIL.	B210	0.30	105.00
07/11/23	DNR	CORRESPONDENCE TO AHUJA & CLARK REGARDING QUARTERLY REPORT.	BT155	0.10	35.00
07/12/23	DNR	CORRESPONDENCE WITH INVESTOR'S SON REGARDING POWER OF ATTORNEY DOCUMENTS; REVIEW SAME ON BEHALF INVESTOR.	B110	0.30	105.00
07/12/23	DNR	REVIEW AND RESPOND TO INVESTOR INQUIRIES.	B110	0.20	70.00



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DEBORAH WILLIAMSON

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DATE	ID	DESCRIPTION	TASK	HOURS	AMOUNT
07/12/23	DNR	CORRESPONDENCE WITH GULF COAST REGARDING SUTTON COUNTY STATEMENTS; REVIEW SAME FROM GULF COAST.	B210	0.20	70.00
07/12/23	DNR	TELEPHONE CONFERENCE AND SUBSEQUENT CORRESPONDENCE WITH COMPUTITLE REGARDING BAHAMIAN REAL PROPERTY RECORDS SEARCH.	B120	0.30	105.00
07/12/23	DNR	CALL WITH DEBORAH D. WILLIAMSON AND REID COLLINS REGARDING OPPOSING COUNSEL'S DOCUMENT REQUESTS.	BT160	0.50	175.00
07/12/23	DNR	CORRESPONDENCE WITH CONTRACT OPERATOR REGARDING VENDOR CLEANUP INVOICE.	B210	0.20	70.00
07/12/23	DNR	RECEIVE AND PROCESS RECEIVER'S MAIL.	B210	0.30	105.00
07/12/23	DNR	CORRESPONDENCE WITH COMPLIANCE TEAM REGARDING GENERAL LAND OFFICE REPORTING AND PRE-RECEIVERSHIP ROYALTY PAYMENTS DUE.	B210	0.30	105.00
07/12/23	DNR	PROCESS VENDOR CLEANUP INVOICE AND DISCUSS WITH DEBORAH D. WILLIAMSON.	B210	0.20	70.00
07/12/23	DNR	CORRESPONDENCE TO DARRELL R. JONES REGARDING QUARTERLY REPORT.	BT155	0.10	35.00
07/12/23	MDWO	CONTINUED DRAFTING SEVENTH QUARTERLY REPORT.	BT155	3.00	999.00
07/13/23	DNR	CORRESPONDENCE WITH CONTACT OPERATOR REGARDING LOADOUT INVOICE.	B210	0.20	70.00
07/13/23	DNR	DISCUSS WITH DEBORAH D. WILLIAMSON AND PROCESS LOADOUT INVOICE.	B210	0.20	70.00
07/13/23	DNR	PROCESS PAYMENT FOR STORAGE IN ELECTRA FOR AUGUST RENT.	B210	0.20	70.00
07/13/23	DNR	CALL WITH AHUJA & CLARK REGARDING TAX AND ACCOUNTING OUTSTANDING ITEMS.	B240	0.50	175.00
07/13/23	DNR	CORRESPONDENCE WITH REID COLLINS REGARDING OPPOSING COUNSEL'S DOCUMENT REQUESTS; REVIEW ITEMS FOR SAME.	BT160	0.30	105.00
07/13/23	DNR	DISCUSS WITH DEBORAH D. WILLIAMSON POTENTIAL CAUSES OF ACTION.	BT160	0.20	70.00
07/13/23	DNR	TELEPHONE CONFERENCE WITH INVESTOR REGARDING CASE STATUS.	B110	0.10	35.00
07/13/23	DNR	CORRESPONDENCE WITH BROKER REGARDING STAUS ON ELDORADO RANCH.	B130	0.20	70.00
07/13/23	DNR	TELEPHONE CONFERENCE WITH DARRELL R. JONES REGARDING QUARTERLY REPORT.	BT155	0.10	35.00



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DEBORAH WILLIAMSON

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07/13/23	DNR	RECEIVE AND PROCESS RECEIVER'S MAIL.	B210	0.30	105.00
07/13/23	DNR	CALL WITH TXTAG TO DISPUTE VEHICLE OWNERSHIP OF TOLL VIOLATIONS STATEMENT; SUBMIT PAPERWORK ONLINE FOR SAME.	B210	0.40	140.00
07/14/23	DNR	RESEARCH RAILROAD COMMISSION WEBSITE FOR OPERATOR STATUS AND FINANCIAL ASSURANCE INFORMATION.	B210	0.30	105.00
07/14/23	DNR	PROVIDE UPDATE TO OIL AND GAS COUNSEL AND DEBORAH D. WILLIAMSON REGARDING FINANCIAL ASSURANCE STATUS OF OPERATORS WITH RAILROAD COMMISSION.	B210	0.10	35.00
07/14/23	DNR	CORRESPONDENCE WITH AHUJA & CLARK REGARDING QUARTERLY REPORT.	BT155	0.20	70.00
07/14/23	DNR	UPDATE SEC COUNSEL ON RAILROAD COMMISSION FINANCIAL ASSURANCE.	B210	0.10	35.00
07/14/23	DNR	CORRESPONDENCE TO COMPUTITLE REGARDING BAHAMIAN RECORDS REQUEST SEARCH.	B120	0.10	35.00
07/14/23	DNR	CORRESPONDENCE WITH DEBORAH D. WILLIAMSON REGARDING QUARTERLY REPORT AND ADDITIONAL CONTENT REGARDING RAILROAD COMMISSION.	BT155	0.20	70.00
07/14/23	DNR	RECEIVE AND PROCESS RECEIVER'S MAIL.	B210	0.30	105.00
07/14/23	DNR	SEND COMPLIANCE TEAM RAILROAD COMMISSION MAIL RECEIVED.	B210	0.10	35.00
07/14/23	DNR	PREPARE AND SUBMIT RECEIVERSHIP DOCUMENTATION TO TXTAG TO DISPUTE TOLL VIOLATIONS.	B210	0.40	140.00
07/14/23	DNR	CORRESPONDENCE WITH CONTRACT OPERATOR RE UPDATE ON P-4 TRANSFER AND DISMISSED DOCKETS BY POTENTIAL PURCHASER WITH RAILROAD COMMISSION.	B130	0.20	70.00
07/14/23	DNR	REVIEW AND RESPOND TO INVESTOR INQUIRIES.	B110	0.20	70.00
07/14/23	DNR	RESEARCH RECEIVER LITIGATION AGAINST THIRD PARTIES INVOLVING PONZI SCHEMES.	BT160	1.00	350.00
07/15/23	DNR	CORRESPONDENCE WITH CONTRACT OPERATOR REGARDING GOOD FAITH CLAIM HEARINGS AND WITHDRAWAL OF PORTION FOR POTENTIAL PURCHASER.	B130	0.20	70.00
07/17/23	DNR	CORRESPONDENCE TO GENERAL LAND OFFICE REGARDING COURT ORDER APPROVING VICKI PALMOUR CONSULTING AS OIL AND GAS CONSULTANT TO RECEIVER.	B210	0.10	35.00
07/17/23	DNR	REPORT FOR COMPLIANCE CALL WITH TEAM.	B210	0.70	245.00
07/17/23	DNR	RECEIVE AND REVIEW IBC BANK ACCOUNT ANALYSIS; SEND TO	B210	0.20	70.00



DEBORAH D WILLIAMSON
DEBORAH WILLIAMSON

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DATE	ID	DESCRIPTION	TASK	HOURS	AMOUNT
		AHUJA & CLARK.			
07/17/23	DNR	TELEPHONE CONFERENCE WITH TXTAG REGARDING TOLL STATEMENT AND SOLD VEHICLE AND REQUEST FOR LEGAL OR SUPERVISOR CALLBACK.	B210	0.30	105.00
07/17/23	MDWO	REVISED SEVENTH QUARTERLY REPORT.	BT155	2.00	666.00
07/17/23	DNR	CORRESPONDENCE WITH DEBORAH D. WILLIAMSON AND REID COLLINS REGARDING DOCUMENT REQUESTS OF OPPOSING COUNSEL.	BT160	0.60	210.00
07/17/23	DNR	REVIEW NUMEROUS EMAILS FROM RAILROAD COMMISSION OF TEXAS WITH ATTACHMENTS REGARDING DODSON PRAIRIE P-5 AND OPERATOR STATUS.	B210	0.40	140.00
07/17/23	DNR	CORRESPONDENCE TO COMPLIANCE TEAM REGARDING RAILROAD COMMISSION OF TEXAS P-5 EMAILS RECEIVED FOR DODSON PRAIRIE.	B210	0.10	35.00
07/17/23	DNR	CORRESPONDENCE WITH BROKER AND TERESA E. GILTNER REGARDING ELECTRA COUNTEROFFER COMMENTS AND STEPS FORWARD.	B130	0.40	140.00
07/17/23	DNR	REVIEW CORRESPONDENCE FROM TXTAG REGARDING TOLL VIOLATION DISPUTE.	B210	0.10	35.00
07/17/23	DNR	REVIEW CORRESPONDENCE FROM AHUJA & CLARK REGARDING POTENTIAL TAX AND PENALTY IMPACT ON SINGLE MEMBER LLC ENTITIES.	B240	0.10	35.00
07/17/23	DNR	DISCUSS RAILROAD COMMISSION OF TEXAS CORRESPONDENCE AND OPERATOR ISSUES WITH DEBORAH D. WILLIAMSON.	B210	0.20	70.00
07/17/23	DNR	CALL TO SEC COUNSEL REGARDING CASE STATUS.	B110	0.10	35.00
07/17/23	DNR	TELEPHONE CONFERENCE WITH TERESA E. GILTNER REGARDING STATUS OF ELDORADO AND ELECTRA PROPERTIES.	B130	0.30	105.00
07/17/23	DNR	RECEIVE AND REVIEW RAILROAD COMMISSION OF TEXAS PIPELINE SAFETY PACKAGE; SEND TO COMPLIANCE TEAM.	B210	0.20	70.00
07/17/23	DNR	REVIEW CORRESPONDENCE FROM INVESTOR.	B110	0.10	35.00
07/17/23	DNR	CORRESPONDENCE TO COMPTROLLER REGARDING PRE-RECEIVERSHIP REPORTING ISSUES.	B240	0.10	35.00
07/17/23	DNR	CORRESPONDENCE TO IRS APPEALS OFFICER REGARDING RECEIVERSHIP CASE AND LIEN HEARINGS.	B240	0.10	35.00
07/17/23	DNR	REPORT FOR TAX AND FORENSIC ACCOUNTING CALL WITH DEBORAH D. WILLIAMSON AND AHUJA & CLARK.	B240	1.10	385.00



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07/17/23	DNR	CORRESPONDENCE WITH COMPUTITLE REGARDING REAL PROPERTY SEARCH PROCESS AND TERMS.	B120	0.20	70.00
07/17/23	DNR	REVIEW CLAIMS AND DISBURSEMENT FORMS FROM STRETTO.	B310	0.10	35.00
07/17/23	DNR	CORRESPONDENCE WITH STRETTO REGARDING CLAIMS PLATFORMS AND CONFIDENTIAL INFORMATION.	B310	0.20	70.00
07/17/23	DNR	CORRESPONDENCE WITH CONTRACT OPERATOR REGARDING ASSUMPTION PROPOSAL FOR SPECIFIC LEASE.	B130	0.20	70.00
07/17/23	DNR	CORRESPONDENCE FROM CONTRACT OPERATOR REGARDING INSURANCE RENEWAL; REVIEW INSURANCE RENEWAL MATERIALS FROM BROKER.	B210	0.40	140.00
07/17/23	DNR	CORRESPONDENCE WITH OIL AND GAS COUNSEL AND DEBORAH D. WILLIAMSON REGARDING INTERESTED ASSIGNEE FOR OIL AND GAS ASSETS AND ISSUES REGARDING SAME.	B130	0.40	140.00
07/18/23	DNR	DISCUSS RECEIVERSHIP ORDER PROVISIONS WITH DEBORAH D. WILLIAMSON REGARDING BAHAMAS PROCESS.	B110	0.10	35.00
07/18/23	DNR	CORRESPONDENCE WITH GENERAL LAND OFFICE REGARDING ELECTRONIC REPORTING AGREEMENT AND ISSUES IN RECEIVERSHIP RE SAME; REVIEW DRAFT OF SAME; PROVIDE POWER OF ATTORNEY OF RECEIVER FOR VICKI PALMOUR CONSULTING TO GENERAL LAND OFFICE.	B210	0.70	245.00
07/18/23	DNR	CORRESPONDENCE WITH OIL AND GAS COUNSEL REGARDING COURT APPROVAL FOR ANY DISPOSITION OR ABANDONMENT PROPOSALS.	B130	0.20	70.00
07/18/23	DNR	TELEPHONE CONFERENCE WITH COMPUTITLE REGARDING PAYMENT OF ADMINISTRATIVE FEE AND REAL PROPERTY SPECIAL REPORT QUOTE; SUBSEQUENT CORRESPONDENCE REGARDING DETAILS FOR SAME.	B120	0.30	105.00
07/18/23	DNR	TELEPHONE CONFERENCE WITH CONTRACT OPERATOR REGARDING COMMENTS ON INSURANCE RENEWAL QUOTES.	B210	0.20	70.00
07/18/23	DNR	CORRESPONDENCE TO AHUJA & CLARK REGARDING INTERNATIONAL PAYMENT AND BANK ACCOUNT ITEMS.	B210	0.10	35.00
07/18/23	DNR	CALL WITH TXTAG SUPERVISOR REGARDING BILL OF SALE AND REMOVAL OF TOLL VIOLATION CHARGES FROM ACCOUNT.	B210	0.10	35.00
07/18/23	DNR	CORRESPONDENCE WITH TXTAG SUPERVISOR AND PROVIDE DOCUMENTATION OF PRIOR SALE, RECEIVERSHIP ORDER, AND TXTAG STATEMENT FOR DISPUTE OF CHARGES.	B210	0.30	105.00
07/18/23	DNR	PREPARE AND SUBMIT TO TXDMV VEHICLE TRANSFER NOTICE PACKAGE.	B130	0.30	105.00



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07/18/23	DNR	CORRESPONDENCE WITH DEBORAH D. WILLIAMSON REGARDING INSURANCE COVERAGE AND RENEWAL ISSUES.	B210	0.30	105.00
07/18/23	DNR	CORRESPONDENCE WITH CONTRACT OPERATOR REGARDING REVISIONS TO INSURANCE RENEWAL DOCUMENTS.	B210	0.20	70.00
07/18/23	DNR	REVISE QUARTERLY REPORT FOR 2Q2023.	BT155	3.30	1,155.00
07/18/23	DNR	CORRESPONDENCE FROM STRETTO REGARDING CONFIDENTIAL INVESTOR INFORMATION AND REVIEW OF MATERIALS REGARDING SAME.	B310	0.20	70.00
07/18/23	DNR	CORRESPONDENCE WITH DEBORAH D. WILLIAMSON AND AHUJA & CLARK REGARDING INVESTOR CONTACT SPREADSHEET ITEMS.	B310	0.40	140.00
07/18/23	DNR	CORRESPONDENCE WITH DEBORAH D. WILLIAMSON AND REID COLLINS REGARDING MEDIATION AND OPPOSING COUNSEL'S DOCUMENT REQUESTS.	BT160	0.40	140.00
07/18/23	DNR	CORRESPONDENCE TO AUCTIONEER REGARDING CURRENT AUCTION OF PERSONAL PROPERTY.	B130	0.10	35.00
07/18/23	DNR	CORRESPONDENCE WITH DEBORAH D. WILLIAMSON REGARDING PUBLICATION AND NOTICING ASPECT OF CLAIMS PROCESS.	B310	0.30	105.00
07/18/23	DNR	CORRESPONDENCE TO DEBORAH D. WILLIAMSON REGARDING THIRD PARTY CLAIMS.	BT160	0.10	35.00
07/18/23	DNR	REVIEW AND RESPOND TO INVESTOR INQUIRIES.	B110	1.00	350.00
07/18/23	DNR	REVIEW FARMOUT UPDATE FROM SDMB RESOURCES.	B130	0.20	70.00
07/18/23	DNR	TELEPHONE CONFERENCE WITH SEC COUNSEL REGARDING CASE STATUS.	B110	0.40	140.00
07/18/23	DNR	CORRESPONDENCE TO AHUJA & CLARK REGARDING INVESTORS AND INVESTMENT AMOUNTS.	B310	0.10	35.00
07/18/23	DNR	DISCUSS WITH DEBORAH D. WILLIAMSON DRAFT QUARTERLY REPORT FOR 2Q2023.	BT155	0.20	70.00
07/18/23	DNR	CORRESPONDENCE TO AHUJA & CLARK REGARDING SOCIAL SECURITY ADMINISTRATION MAIL RECEIVED.	B210	0.10	35.00
07/18/23	DNR	RECEIVE AND PROCESS RECEIVER'S MAIL.	B210	0.60	210.00
07/19/23	DNR	TELEPHONE CONFERENCE WITH LANDOWNER COUNSEL REGARDING ABANDONMENT STATUS.	B110	0.20	70.00
07/19/23	DNR	CORRESPONDENCE WITH AHUJA & CLARK REGARDING RECEIPTS AND DISBURSEMENTS INFORMATION FOR QUARTERLY REPORT.	BT155	0.40	140.00



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07/19/23	DNR	CORRESPONDENCE WITH LANDOWNER COUNSEL REGARDING OIL AND GAS LEASE AND COUNSEL QUESTIONS.	B110	0.20	70.00
07/19/23	TED	ADDRESS INVESTOR INQUIRIES.	B110	0.30	76.95
07/19/23	DNR	REVIEW AND RESPOND TO INVESTOR INQUIRIES.	B110	0.40	140.00
07/19/23	DNR	CORRESPONDENCE WITH AHUJA & CLARK REGARDING TIEP INVESTOR SPREADSHEET AND OUTSTANDING ITEMS ON SAME.	B120	0.30	105.00
07/19/23	DNR	ANALYZE TIEP INVESTOR SPREADSHEET SENT BY AHUJA & CLARK.	B120	0.20	70.00
07/19/23	DNR	ANALYZE BANK RECORDS AND PROVIDE DOCUMENTATION TO AHUJA & CLARK FOR EXHIBIT TO QUARTERLY REPORT.	BT155	0.40	140.00
07/19/23	DNR	CORRESPONDENCE WITH GENERAL LAND OFFICE REGARDING FILING OF RECEIVERSHIP ENTITY REPORTS AND ISSUES ON SAME.	B210	0.40	140.00
07/19/23	DNR	CORRESPONDENCE WITH COMPUTITLE REGARDING SEARCH NAMES FOR REPORTS ON BAHAMIAN REAL PROPERTY.	B120	0.40	140.00
07/19/23	DNR	DISCUSS SOCIAL SECURITY ADMINISTRATION MAIL RECEIVED FOR VARIOUS RECEIVERSHIP ENTITIES WITH DEBORAH D. WILLIAMSON.	B210	0.20	70.00
07/19/23	DNR	TELEPHONE CONFERENCE WITH INVESTOR REGARDING INVESTMENT-SPECIFIC INQUIRY.	B110	0.10	35.00
07/19/23	DNR	CORRESPONDENCE WITH COMPTROLLER COUNSEL REGARDING DIESEL FUEL TAX REPORTS.	B240	0.40	140.00
07/19/23	DNR	CORRESPONDENCE WITH AHUJA & CLARK REGARDING W-2 TAX AND PRE-RECEIVERSHIP REPORTING ISSUES FOR VARIOUS RECEIVERSHIP ENTITIES.	B240	0.20	70.00
07/19/23	DNR	TELEPHONE CONFERENCE WITH VICKI PALMOUR CONSULTING REGARDING GENERAL LAND OFFICE REPORTS AND FILING AGREEMENT ISSUES.	B210	0.10	35.00
07/19/23	DNR	TELEPHONE CONFERENCE WITH AHUJA & CLARK REGARDING PAYROLL RECORDS OF HEARTLAND GROUP VENTURES AND AOS FOR 2021.	B240	0.30	105.00
07/19/23	DNR	TELEPHONE CONFERENCE WITH CONTRACT OPERATOR REGARDING VENDOR INVOICES AND CLEANUP ISSUES.	B210	0.20	70.00
07/19/23	DNR	DISCUSS WITH DEBORAH D. WILLIAMSON ISSUES ON PRE-RECEIVERSHIP PAYROLL AND EMPLOYMENT TAX RECORDS FOR AOS AND HEARTLAND GROUP VENTURES.	B210	0.20	70.00
07/19/23	DNR	RECEIVE AND PROCESS RECEIVER'S MAIL.	B210	0.30	105.00



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07/19/23	DNR	PROCESS PAYMENT WITH COMPUTITLE FOR ASSET SEARCH REPORT FEES.	B120	0.10	35.00
07/19/23	DNR	TELEPHONE CONFERENCE WITH AHUJA & CLARK REGARDING TIEP INVESTOR ANALYSIS.	B120	0.40	140.00
07/19/23	DNR	REVISE 2Q2023 QUARTERLY REPORT.	BT155	0.20	70.00
07/19/23	DNR	CORRESPONDENCE WITH AHUJA & CLARK REGARDING PRE-RECEIVERSHIP TAX RETURNS AND REPORTING OF PAYROLL ISSUES.	B240	0.20	70.00
07/19/23	DNR	REVIEW TUFTA AND PONZI SCHEME PRE-SUIT RECEIVERSHIP MATERIALS.	B120	0.60	210.00
07/20/23	DNR	CORRESPONDENCE FROM AUCTIONEER REGARDING JEWELRY VALUATION.	B120	0.10	35.00
07/20/23	DNR	CORRESPONDENCE WITH AHUJA & CLARK REGARDING INVESTORS AND INVESTMENT TOTALS.	B120	0.20	70.00
07/20/23	DNR	REVISE QUARTERLY REPORT.	BT155	0.20	70.00
07/20/23	DNR	REVIEW CORPORATE AND FORMATION DOCUMENTS REGARDING TIEP.	B120	0.50	175.00
07/20/23	DNR	DRAFT DEMAND LETTER FOR TIEP INVESTORS RECOVERY OF PRE-RECEIVERSHIP TRANSFERS.	B120	1.50	525.00
07/20/23	DNR	ANALYZE TIEP RECORDS OBTAINED FROM HEARTLAND OFFICE.	B120	0.70	245.00
07/20/23	DNR	CORRESPONDENCE WITH COMPUTITLE REGARDING SPECIAL REPORT AND DEEDS TO REAL PROPERTY.	B120	0.30	105.00
07/20/23	DNR	REVIEW SPECIAL REPORT SEARCH RESULTS FOR BAHAMIAN REAL PROPERTY.	B120	0.30	105.00
07/20/23	DNR	PROVIDE UPDATE ON SEARCH RESULTS REGARDING BAHAMAS REAL PROPERTY TO DEBORAH D. WILLIAMSON.	B120	0.10	35.00
07/20/23	DNR	CORRESPONDENCE WITH SEC COUNSEL REGARDING BAHAMIAN REAL PROPERTY AND RECORDS REQUEST.	B120	0.40	140.00
07/20/23	DNR	RECEIVE AND REVIEW APPRAISAL AND REPORT INFORMATION ON CERTAIN GOLD AND GEMSTONE JEWELRY.	B120	0.50	175.00
07/20/23	DNR	CORRESPONDENCE TO SEC COUNSEL REGARDING VALUATION INFORMATION ON CERTAIN JEWELRY.	B110	0.10	35.00
07/20/23	DNR	RECEIVE AND PROCESS RECEIVER'S MAIL.	B210	0.40	140.00
07/20/23	DNR	CORRESPONDENCE WITH AUCTIONEER REGARDING INVOICE FOR APPRAISAL OF CERTAIN JEWELRY.	B120	0.10	35.00
07/20/23	DNR	TELEPHONE CONFERENCE WITH AUCTIONEER REGARDING	B130	0.20	70.00



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		CURRENT AUCTION OF PERSONAL PROPERTY.			
07/20/23	DNR	SEND TEXAS RAILROAD COMMISSION EMAIL TO COMPLIANCE TEAM.	B210	0.10	35.00
07/20/23	DNR	RECEIVE AND REVIEW ENVIRONMENTAL OPERATIONS MEMO FROM CONTRACT OPERATOR.	B210	0.30	105.00
07/21/23	TED	ADDRESS INVESTOR INQUIRIES.	B110	0.30	76.95
07/21/23	DNR	CORRESPONDENCE WITH SEC COUNSEL REGARDING UPCOMING PLEADINGS AND RECORDS REQUESTS.	B110	0.20	70.00
07/21/23	DNR	CORRESPONDENCE WITH DEBORAH D. WILLIAMSON AND CONTRACT OPERATOR REGARDING INSURANCE RENEWALS.	B210	0.40	140.00
07/21/23	DNR	CORRESPONDENCE WITH COMPLIANCE TEAM REGARDING OPERATIONS MEMOS REGARDING TEXAS RAILROAD COMMISSION ALLEGED VIOLATIONS AND REMAINING ITEMS ON SAME.	B210	0.30	105.00
07/21/23	DNR	CORRESPONDENCE WITH POTENTIAL BUYER COUNSEL AND CONTRACT OPERATOR REGARDING GOOD FAITH CLAIM HEARING ITEMS.	B130	0.30	105.00
07/21/23	DNR	CORRESPONDENCE TO COMPLIANCE TEAM REGARDING GENERAL LAND OFFICE EMAILS.	B210	0.10	35.00
07/21/23	DNR	REVIEW EMAILS FROM GENERAL LAND OFFICE REGARDING MISSING REPORTS.	B210	0.20	70.00
07/21/23	DNR	CORRESPONDENCE WITH COMPUTITLE REGARDING DEED RECORD REQUEST.	B120	0.50	175.00
07/21/23	DNR	CORRESPONDENCE WITH DEBORAH D. WILLIAMSON REGARDING BAHAMAS REAL PROPERTY DEEDS AND ITEMS ON SAME.	B120	0.20	70.00
07/21/23	DNR	TELEPHONE CONFERENCE WITH AHUJA & CLARK REGARDING AOS AND VENTURES 2021 TAX DOCUMENTS AND RESPONSE TO SOCIAL SECURITY ADMINISTRATION ON SAME.	B240	0.30	105.00
07/21/23	DNR	PROCESS PAYMENT FOR CERTIFIED DEED REQUESTS.	B120	0.10	35.00
07/21/23	DNR	RECEIVE AND PROCESS UTILITY BILL FOR ELECTRA.	B210	0.20	70.00
07/21/23	DNR	TELEPHONE CONFERENCE WITH VICKI PALMOUR CONSULTING REGARDING ROYALTY TRANSFER AND DOCUMENTS ON SAME.	B210	0.10	35.00
07/21/23	DNR	TELEPHONE CONFERENCE WITH MINERAL OWNER REGARDING INTEREST TRANSFER.	B110	0.30	105.00
07/21/23	DNR	TELEPHONE CONFERENCE WITH DEBORAH D. WILLIAMSON REGARDING TAX DOCUMENTS AND W-2 ISSUES FOR 2021.	B240	0.20	70.00



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07/21/23	DNR	CORRESPONDENCE WITH AHUJA & CLARK REGARDING 2021 TAX DOCUMENTS AND DIRECTION FOR W-2 ITEMS.	B240	0.20	70.00
07/21/23	DNR	CORRESPONDENCE TO ROYALTY OWNER REGARDING TRANSFER OF ROYALTY INTEREST AND COPY OF DEATH AND WILL ITEMS.	B110	0.10	35.00
07/24/23	TED	ADDRESS INVESTOR INQUIRIES.	B110	0.10	25.65
07/24/23	DNR	CORRESPONDENCE WITH DEBORAH D. WILLIAMSON REGARDING COMPLIANCE CALL ITEMS.	B210	0.20	70.00
07/24/23	DNR	CORRESPONDENCE WITH GULF COAST REGARDING REFUND DUE FOR 2021 AND DETAILS ON SAME.	B210	0.50	175.00
07/24/23	DNR	REPORT FOR COMPLIANCE CALL WITH TEAM.	B210	0.80	280.00
07/24/23	DNR	CORRESPONDENCE WITH VICKI PALMOUR CONSULTING AND OIL AND GAS COUNSEL REGARDING GLO ELECTRONIC FILING AND ISSUES ON SAME.	B210	0.20	70.00
07/24/23	DNR	RECEIVE AND PROCESS PERSONAL PROPERTY APPRAISAL INVOICE.	B120	0.20	70.00
07/24/23	DNR	DISCUSS INSURANCE RENEWAL ITEMS WITH DEBORAH D. WILLIAMSON.	B210	0.10	35.00
07/24/23	DNR	PROCESS INSURANCE POLICY RENEWAL PAYMENT.	B210	0.20	70.00
07/24/23	DNR	REVIEW OPERATIONS MEMO REGARDING POTENTIAL PLUGGING AND ASSIGNMENT.	B210	0.20	70.00
07/24/23	DNR	DISCUSS WITH DEBORAH D. WILLIAMSON THE REPORT AND RECOMMENDATION REGARDING PIPELINE AND ABANDONMENT MOTIONS.	B130	0.30	105.00
07/24/23	DNR	CORRESPONDENCE WITH FARMEE COUNSEL REGARDING UNPAID EXPENSES OWED TO RECEIVER.	B210	0.30	105.00
07/24/23	DNR	REVIEW REPORT AND RECOMMENDATION OF JUDGE RAY REGARDING PIPELINE AND ABANDONMENT MOTIONS.	B130	0.30	105.00
07/24/23	DNR	CORRESPONDENCE WITH COMPLIANCE TEAM REGARDING R&R ON PIPELINE AND ABANDONMENT MOTIONS AND NEXT STEPS.	B130	0.40	140.00
07/24/23	DNR	CORRESPONDENCE FROM RAILROAD COMMISSION REGARDING GOOD FAITH CLAIM HEARING ON AUGUST 3, 2023; SEND TO COMPLIANCE TEAM.	B130	0.20	70.00
07/24/23	DNR	CORRESPONDENCE FROM RAILROAD COMMISSION REGARDING GOOD FAITH CLAIM HEARING ON AUGUST 4, 2023; DISCUSS WITH COMPLIANCE TEAM.	B130	0.40	140.00
07/24/23	DNR	CONTINUE DRAFTING QUARTERLY REPORT.	BT155	0.30	105.00



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07/24/23	DNR	CORRESPONDENCE WITH DEBORAH D. WILLIAMSON REGARDING REVISED QUARTERLY REPORT.	BT155	0.10	35.00
07/24/23	DNR	CORRESPONDENCE WITH AHUJA & CLARK REGARDING RECEIPTS AND DISBURSEMENT EXHIBIT TO QUARTERLY REPORT AND DETAILS ON SAME.	BT155	0.30	105.00
07/24/23	DNR	CORRESPONDENCE WITH TERESA E. GILTNER AND BROKER REGARDING STATUS OF COUNTEROFFERS FOR ELECTRA; CALL WITH TERESA E. GILTNER REGARDING ISSUES ON SAME.	B130	0.40	140.00
07/24/23	DNR	CORRESPONDENCE WITH ROYALTY OWNER REGARDING TRANSFER OF INTEREST AND DEATH PAPERWORK; REVIEW SAME; SEND TO VICKI PALMOUR CONSULTING FOR PROCESSING NEW DIVISION ORDERS.	B110	0.40	140.00
07/24/23	DNR	CORRESPONDENCE WITH SEC COUNSEL REGARDING FINDINGS AND CONCLUSIONS OF MAGISTRATE FOR VARIOUS PLEADINGS.	B110	0.20	70.00
07/24/23	DNR	CORRESPONDENCE WITH INVESTOR REGARDING CASE STATUS.	B110	0.20	70.00
07/24/23	DNR	TELEPHONE CONFERENCE WITH CONTRACT OPERATOR REGARDING VENDOR INVOICE AND POST-SALE CHARGES; CORRESPONDENCE REGARDING SAME.	B210	0.10	35.00
07/24/23	DNR	CORRESPONDENCE WITH DEBORAH D. WILLIAMSON REGARDING NOTICES OF TAX LIENS RECEIVED FROM LAW FIRM.	B240	0.20	70.00
07/24/23	DNR	CORRESPONDENCE TO COMPLIANCE TEAM REGARDING LETTER RECEIVED FROM CRUDE OIL COMPANY REGARDING PRE-RECEIVERSHIP PRODUCTION.	B210	0.10	35.00
07/24/23	DNR	RECEIVE AND PROCESS RECEIVER'S MAIL.	B210	1.00	350.00
07/24/23	DNR	CORRESPONDENCE WITH JEANMARIE BAER REGARDING YOUNG COUNTY NOTICES OF TAX LIENS AND ISSUES REGARDING RECEIVERSHIP ORDER FOR CREDITOR.	B240	0.30	105.00
07/24/23	DNR	CORRESPONDENCE TO AHUJA & CLARK REGARDING IRS MAIL RECEIVED.	B240	0.10	35.00
07/24/23	DNR	CORRESPONDENCE FROM AHUJA & CLARK REGARDING TIEP INVESTOR ANALYSIS ITEMS.	B120	0.10	35.00
07/25/23	TED	ADDRESS INVESTOR INQUIRIES.	B110	0.10	25.65
07/25/23	DNR	RECEIVE AND REVIEW METER STATEMENT FROM GULF COAST; CORRESPONDENCE WITH COMPLIANCE TEAM REGARDING AMOUNTS OWED BY FARMEE.	B210	0.40	140.00
07/25/23	DNR	CORRESPONDENCE WITH AUCTIONEER REGARDING CURRENT	B130	0.80	280.00



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07/25/23	DNR	CORRESPONDENCE WITH CONTRACT OPERATOR REGARDING PRE-RECEIVERSHIP INVOICES FOR VENDOR.	B210	0.20	70.00
07/25/23	DNR	CORRESPONDENCE WITH AUCTIONEER REGARDING PRIVATE SALE FOR CERTAIN PERSONAL PROPERTY AND POTENTIAL OFFERS ON SAME.	B130	0.20	70.00
07/25/23	DNR	TELEPHONE CONFERENCE WITH AHUJA & CLARK REGARDING EXHIBIT TO QUARTERLY REPORT AND COMMENTS ON SAME.	BT155	0.20	70.00
07/25/23	DNR	DISCUSS WITH DEBORAH D. WILLIAMSON EXHIBIT TO QUARTERLY REPORT FOR RECEIPTS AND DISBURSEMENTS.	BT155	0.30	105.00
07/25/23	DNR	RECEIVE AND REVIEW AGREEMENT SIGNED BY VICKI PALMOUR CONSULTING FOR GENERAL LAND OFFICE REPORTING ON BEHALF OF RECEIVER.	B210	0.20	70.00
07/25/23	DNR	CORRESPONDENCE WITH GENERAL LAND OFFICE REGARDING ELECTRONIC REPORTING AGREEMENT OF VICKI PALMOUR CONSULTING AND COURT ORDERS REGARDING RECEIVERSHIP.	B210	0.40	140.00
07/25/23	DNR	DISCUSS WITH DEBORAH D. WILLIAMSON PRIVATE SALE AND AUCTION ISSUES.	B130	0.70	245.00
07/25/23	DNR	RECEIVE AND REVIEW REVISED EXHIBIT TO QUARTERLY REPORT FROM AHUJA & CLARK; PROVIDE ADDITIONAL EDITS AND COMMENTS TO AHUJA & CLARK REGARDING SAME.	BT155	0.40	140.00
07/25/23	DNR	RECEIVE AND REVIEW FINAL VERSION OF EXHIBIT TO QUARTERLY REPORT.	BT155	0.20	70.00
07/25/23	DNR	CORRESPONDENCE TO COMPTROLLER REGARDING PRE-RECEIVERSHIP DIESEL TAX REPORTING ISSUES.	B240	0.10	35.00
07/25/23	DNR	CORRESPONDENCE WITH IRS REGARDING REQUEST FOR UPDATE ON TAX LIEN AND PROTOCOL FOR RECEIVERSHIPS.	B240	0.40	140.00
07/25/23	DNR	RECEIVE CORRESPONDENCES FROM POTENTIAL BUYER COUNSEL REGARDING WITHDRAWAL OF P-4S BEFORE RAILROAD COMMISSION; SEND TO COMPLIANCE TEAM.	B130	0.40	140.00
07/25/23	DNR	CORRESPONDENCE WITH SEC COUNSEL REGARDING POTENTIAL CAUSES OF ACTION DISCUSSION.	B110	0.20	70.00
07/25/23	DNR	REPORT FOR ACCOUNTING AND TAX CALL WITH AHUJA & CLARK.	B240	1.10	385.00
07/25/23	DNR	CORRESPONDENCE TO REID COLLINS REGARDING MEDIATION BRIEFING.	BT160	0.10	35.00
07/25/23	DNR	REVISE MOTION TO SELL CERTAIN JEWELRY.	B130	0.40	140.00



DEBORAH D WILLIAMSON
DEBORAH WILLIAMSON

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DATE	ID	DESCRIPTION	TASK	HOURS	AMOUNT
07/25/23	DNR	CORRESPONDENCE FROM VENDOR RE PRE-RECEIVERSHIP PRODUCTION STATEMENT RECEIVED.	B210	0.10	35.00
07/25/23	DNR	TELEPHONE CONFERENCE WITH DEBORAH D. WILLIAMSON AND AUCTIONEER REGARDING CURRENT AUCTION AND ITEMS ON SAME.	B130	0.30	105.00
07/25/23	DNR	CORRESPONDENCE TO SEC COUNSEL REGARDING REVISED MOTION TO SELL CERTAIN JEWELRY.	B130	0.10	35.00
07/25/23	DNR	CORRESPONDENCE WITH TERESA E. GILTNER REGARDING ELECTRA PROPERTY AND OFFERS ITEMS.	B130	0.30	105.00
07/25/23	DNR	DISCUSS OFFERS FOR ELECTRA PROPERTY WITH DEBORAH D. WILLIAMSON.	B130	0.10	35.00
07/25/23	DNR	TELEPHONE CONFERENCE WITH JEANMARIE BAER REGARDING YOUNG CAD NOTICES OF TAX LIENS.	B240	0.10	35.00
07/25/23	DNR	RECEIVE AND REVIEW RANGER GAS STATEMENT FOR JUNE 2023; SEND TO VICKI PALMOUR CONSULTING AND CONTRACT OPERATOR.	B210	0.20	70.00
07/26/23	DNR	MEETING WITH AUCTIONEER REGARDING PERSONAL PROPERTY AUCTION ITEMS.	B130	0.80	280.00
07/26/23	DNR	RECEIVE AND REVIEW ORDER OF DISMISSAL FROM RAILROAD COMMISSION; SEND TO COMPLIANCE TEAM.	B130	0.20	70.00
07/26/23	DNR	CALL WITH TERESA E. GILTNER REGARDING COMMENTS ON REVISED CONTRACT FOR ELECTRA PROPERTY.	B130	0.20	70.00
07/26/23	DNR	RECEIVE AND REVIEW REVISED CONTRACT FOR ELECTRA AND MARK COMMENTS.	B130	0.20	70.00
07/26/23	TED	ADDRESS INVESTOR INQUIRIES.	B110	0.30	76.95
07/26/23	DNR	CORRESPONDENCE WITH TERESA E. GILTNER REGARDING FURTHER REVISED ELECTRA CONTRACT; REVIEW SAME.	B130	0.30	105.00
07/26/23	DNR	CORRESPONDENCE WITH AHUJA & CLARK REGARDING REVISED EXHIBIT TO QUARTERLY REPORT AND APPROVAL OF RECEIVER FOR SAME.	BT155	0.30	105.00
07/26/23	DNR	REVISE, FINALIZE, COMPILE, AND FILE QUARTERLY REPORT FOR 2Q2023.	BT155	0.40	140.00
07/26/23	DNR	RECEIVE, REVIEW, AND PROCESS CONTRACT OPERATOR'S JUNE 2023 INVOICE.	B210	0.30	105.00
07/26/23	DNR	DISCUSS WITH DEBORAH D. WILLIAMSON MAGISTRATE'S FINDINGS REGARDING PIPELINE AND ABANDONMENT MOTIONS.	B130	0.20	70.00



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DEBORAH WILLIAMSON

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DATE	ID	DESCRIPTION	TASK	HOURS	AMOUNT
07/26/23	DNR	TELEPHONE CONFERENCE WITH BRANDY MANNING REGARDING MAGISTRATE'S FINDINGS ON PIPELINE AND ABANDONMENT MOTIONS.	B130	0.20	70.00
07/26/23	DNR	CORRESPONDENCE WITH TERESA E. GILTNER AND BROKER REGARDING CONTRACT ACCEPTABLE TO RECEIVER FOR ELECTRA.	B130	0.20	70.00
07/26/23	DNR	CORRESPONDENCE WITH SEC COUNSEL REGARDING MOTION TO SELL CERTAIN JEWELRY.	B110	0.30	105.00
07/26/23	DNR	FINALIZE, COMPILE, AND FILE MOTION TO SELL CERTAIN JEWELRY.	B130	0.30	105.00
07/26/23	DNR	RECEIVE AND REVIEW DRAFT AMENDED TAX RETURN OF DALLAS RESOURCES.	B240	0.40	140.00
07/26/23	JRF	REVISE AND UPDATE CONTACT LIST OF FORMER RECEIVERSHIP ENTITY COUNSEL AND NOTES ON CONTACTS AND DEMANDS REGARDING SAME.	B120	0.90	607.50
07/27/23	TED	ADDRESS INVESTOR INQUIRIES.	B110	0.50	128.25
07/27/23	DNR	CORRESPONDENCE WITH AHUJA & CLARK AND DEBORAH D. WILLIAMSON REGARDING DRAFT AMENDED TAX RETURN ITEMS.	B240	0.30	105.00
07/27/23	DNR	CORRESPONDENCE WITH IRS APPEALS OFFICER REGARDING HEARING ON JULY 7, 2023 AND SUBSEQUENT FORM FROM IRS; SEND TO AHUJA & CLARK AND DEBORAH D. WILLIAMSON.	B240	0.30	105.00
07/27/23	DNR	RECEIVE AND REVIEW FAX FROM IRS REGARDING DETERMINATION OF JULY 7, 2023 APPEALS HEARING; CORRESPONDENCE WITH DEBORAH D. WILLIAMSON AND AHUJA & CLARK REGARDING SAME.	B240	0.50	175.00
07/27/23	DNR	CORRESPONDENCE WITH JEANMARIE BAER REGARDING YOUNG CAD NOTICES OF TAX LIENS.	B240	0.20	70.00
07/27/23	DNR	REVIEW ORDER SETTING HEARING ON AUGUST 23, 2023.	B110	0.10	35.00
07/27/23	DNR	PREPARE AND FILE NOTICE OF HEARING AND SERVICE OF COURT ORDER REGARDING AUGUST 23, 2023 HEARING.	B110	0.30	105.00
07/27/23	DNR	CORRESPONDENCE TO COMPUTITLE WITH BAHAMAS DEEDS AND STATUS OF OBTAINING SAME.	B120	0.50	175.00
07/27/23	DNR	TELEPHONE CONFERENCE WITH DEBORAH D. WILLIAMSON REGARDING BAHAMAS REAL PROPERTY.	B120	0.30	105.00
07/27/23	DNR	CORRESPONDENCE WITH COMPLIANCE TEAM REGARDING RAILROAD COMMISSION MAIL RECEIVED.	B210	0.10	35.00



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DEBORAH WILLIAMSON

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DATE	ID	DESCRIPTION	TASK	HOURS	AMOUNT
07/27/23	DNR	RECEIVE AND PROCESS RECEIVER'S MAIL.	B210	0.30	105.00
07/27/23	DNR	CORRESPONDENCE WITH DEBORAH D. WILLIAMSON REGARDING LOG BOOKS FOR AIRCRAFT AND ITEMS ON SAME.	B130	0.50	175.00
07/27/23	DNR	CALL WITH DEBORAH D. WILLIAMSON AND AHUJA & CLARK REGARDING TAX RETURN ISSUES FOR DALLAS RESOURCES.	B240	0.40	140.00
07/28/23	DNR	CORRESPONDENCE WITH IRS APPEALS OFFICER REGARDING FORMS SENT FROM IRS AND CALL TO DISCUSS SAME WITH AHUJA & CLARK.	B240	0.50	175.00
07/28/23	TED	ADDRESS INVESTOR INQUIRIES.	B110	0.60	153.90
07/28/23	DNR	CORRESPONDENCE WITH ROYALTY OWNER REGARDING DIVISION ORDER PACKAGE; REVIEW RECEIVER'S RECORDS TO RESUBMIT SAME.	B110	0.30	105.00
07/28/23	DNR	ANALYZE NOTICE OF TAX LIEN FROM SCHLEICHER COUNTY; EMAIL COUNSEL REGARDING SALE AND HISTORY REGARDING SAME.	B240	0.50	175.00
07/28/23	DNR	RECEIVE CORRESPONDENCE FROM INVESTOR REGARDING QUESTIONS ON QUARTERLY REPORT.	B110	0.10	35.00
07/28/23	DNR	DRAFT DETAILED RESPONSE TO INVESTOR INQUIRY; CORRESPONDENCE WITH DEBORAH D. WILLIAMSON REGARDING SAME.	B110	0.20	70.00
07/28/23	DNR	CORRESPONDENCE TO BRANDY MANNING REGARDING MAGISTRATE'S REPORT AND RECOMMENDATION ON OIL AND GAS PLEADINGS.	B130	0.10	35.00
07/28/23	DNR	CORRESPONDENCE WITH LOCAL COUNSEL REGARDING CASE STATUS AND UPDATE.	B110	0.20	70.00
07/28/23	DNR	CORRESPONDENCE WITH REID COLLINS REGARDING ADDITIONAL OPPOSING COUNSEL DOCUMENT REQUESTS AND REVIEW OF INFORMATION ON SAME.	BT160	0.60	210.00
07/28/23	DNR	CORRESPONDENCE WITH DEBORAH D. WILLIAMSON REGARDING RAILROAD COMMISSION GOOD FAITH CLAIM HEARINGS.	B130	0.30	105.00
07/28/23	DNR	RECEIVE AND REVIEW INFORMATION REGARDING RAILROAD COMMISSION GOOD FAITH CLAIM HEARINGS OF POTENTIAL BUYER.	B130	0.10	35.00
07/28/23	DNR	CORRESPONDENCE WITH DEBORAH D. WILLIAMSON AND CONTRACT OPERATOR REGARDING POTENTIAL PLUGGING PROPOSAL.	B130	0.20	70.00
07/29/23	DNR	CORRESPONDENCE WITH ROYALTY OWNER REGARDING	B110	0.40	140.00



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DATE	ID	DESCRIPTION	TASK	HOURS	AMOUNT
		DIVISION ORDER PACKAGE AND ISSUES REGARDING SUBMISSION OF SAME.			
07/29/23	DNR	CORRESPONDENCE WITH DEBORAH D. WILLIAMSON AND REID COLLINS REGARDING OPPOSING COUNSEL'S DOCUMENT REQUESTS.	BT160	0.20	70.00
07/31/23	DNR	CORRESPONDENCE WITH ROYALTY OWNER REGARDING DIVISION ORDER ISSUES.	B110	0.20	70.00
07/31/23	DNR	CORRESPONDENCE WITH BRANDY MANNING REGARDING NEXT STEPS FOR DISPOSITION OF OIL AND GAS ASSETS.	B130	0.20	70.00
07/31/23	DNR	CORRESPONDENCE WITH CONTRACT OPERATOR AND VICKI PALMOUR CONSULTING REGARDING PLUGGING PROPOSAL.	B130	0.30	105.00
07/31/23	DNR	CORRESPONDENCE WITH CONTRACT OPERATOR REGARDING QUARTERLY REPORT ITEMS.	BT155	0.40	140.00
07/31/23	DNR	REPORT FOR COMPLIANCE CALL WITH TEAM.	B210	0.50	175.00
07/31/23	DNR	CORRESPONDENCE WITH COMPLIANCE TEAM REGARDING RAILROAD COMMISSION GOOD FAITH CLAIM HEARING ISSUES.	B130	0.20	70.00
07/31/23	DNR	CORRESPONDENCE WITH DEBORAH D. WILLIAMSON REGARDING INVESTOR INQUIRY.	B110	0.20	70.00
07/31/23	DNR	TELEPHONE CONFERENCE WITH CONTRACT OPERATOR REGARDING WORKING INTEREST OWNER CALL AND ISSUES.	B130	0.20	70.00
07/31/23	DNR	RESPONSE TO INVESTOR INQUIRIES.	B110	0.20	70.00
07/31/23	DNR	CORRESPONDENCE TO AUCTIONEER REGARDING CURRENT AUCTION REPORT.	B130	0.10	35.00
07/31/23	DNR	CORRESPONDENCE WITH REID COLLINS REGARDING UPCOMING MEDIATION.	BT160	0.20	70.00
07/31/23	DNR	CORRESPONDENCE FROM RAILROAD COMMISSION REGARDING AUGUST 4, 2023 GOOD FAITH CLAIM HEARING.	B130	0.10	35.00
07/31/23	TED	ADDRESS INVESTOR INQUIRIES.	B110	0.30	76.95
07/31/23	DNR	CORRESPONDENCE FROM RAILROAD COMMISSION REGARDING INACTIVE WELL LETTER; SEND TO COMPLIANCE TEAM.	B210	0.20	70.00
07/31/23	DNR	RECEIVE AND REVIEW UPDATED PICTURES OF ELDORADO RANCH FROM BROKER; SEND TO DEBORAH D. WILLIAMSON.	B130	0.30	105.00
07/31/23	DNR	TELEPHONE CONFERENCE WITH AUCTIONEER REGARDING AUCTION REPORT AND CLOSING ITEMS.	B130	0.20	70.00
07/31/23	DNR	RECEIVE AND PROCESS RECEIVER'S MAIL.	B210	0.50	175.00



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DEBORAH WILLIAMSON

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DATE	ID	DESCRIPTION	TASK	HOURS	AMOUNT
07/31/23	DNR	SEND RAILROAD COMMISSION MAIL TO COMPLIANCE TEAM.	B210	0.10	35.00
		TOTAL		113.00	\$39,392.00



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DEBORAH WILLIAMSON

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BILLING SUMMARY

ID	TIMEKEEPER	TITLE	HOURS	RATE	AMOUNT
JRF	JEFFREY R. FINE	PARTICIPATING MEMBER	0.90	675.00	607.50
DNR	DANIELLE R. BEHRENDIS	SENIOR ATTORNEY	99.10	350.00	34,685.00
MDWO	MICHAEL D. WOMBACHER	ASSOCIATE	10.00	333.00	3,330.00
TED	THERESA E. DICK	PARALEGAL	3.00	256.50	769.50
	TOTAL		113.00		\$39,392.00



DEBORAH D WILLIAMSON
DEBORAH WILLIAMSON

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DISBURSEMENTS

DATE	DESCRIPTION	QUANTITY	RATE	AMOUNT
	PRINTING EXPENSES	1,440.00	0.10	144.00
	RELATIVITY DATA HOSTING	2.00	3,320.00	6,640.00
	SCANNING	62.00	0.10	6.20
	TOTAL DISBURSEMENTS			6,790.20



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 DEBORAH WILLIAMSON

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TASK SUMMARY

TASK	TASK DESCRIPTION	HOURS	AMOUNT
B110	CASE ADMINISTRATION	13.60	4,479.50
B120	ASSET ANALYSIS AND RECOVERY	13.30	4,947.50
B130	ASSET DISPOSITION	16.50	5,775.00
B210	BUSINESS OPERATIONS	29.20	10,220.00
B240	TAX ISSUES	12.10	4,235.00
B310	CLAIMS ADMINISTRATION & OBJECT	2.20	770.00
BT155	STATUS REPORTS	18.90	6,445.00
BT160	LITIGATION CONSULTING	7.20	2,520.00
	TOTAL	113.00	39,392.00

EXPENSE SUMMARY

SCANNING	6.20
PRINTING EXPENSES	144.00
RELATIVITY DATA HOSTING	6,640.00
TOTAL	6,790.20



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

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

DUE UPON RECEIPT

OCTOBER 30, 2023
MATTER #: 122686.000002
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FOR PROFESSIONAL SERVICES RENDERED

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

FEES	\$	44,045.05
DISBURSEMENTS		3,644.80
INVOICE TOTAL	\$	47,689.85



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

DATE	ID	DESCRIPTION	TASK	HOURS	AMOUNT
08/01/23	DNR	PREPARE INTERNATIONAL WIRE FOR DATA HOSTING.	B210	0.10	35.00
08/01/23	DNR	CORRESPONDENCE WITH YAIR BARAHONA REGARDING DATA HOSTING WIRE FOR AUGUST 2023.	B210	0.20	70.00
08/01/23	DNR	TELEPHONE CONFERENCE WITH TERESA E. GILTNER REGARDING ELECTRA CONTACT COMMENTS.	B130	0.30	105.00
08/01/23	DNR	CORRESPONDENCE TO DEBORAH D. WILLIAMSON REGARDING INTERNATIONAL WIRE.	B210	0.10	35.00
08/01/23	DNR	TELEPHONE CONFERENCE WITH ROYALTY OWNER REGARDING CHECK ISSUED IN NOVEMBER 2022 AND ISSUES REGARDING SAME.	B110	0.20	70.00
08/01/23	DNR	PREPARE WITNESS AND EXHIBIT LIST FOR AUGUST 23, 2023 HEARING.	B110	0.20	70.00
08/01/23	DNR	TELEPHONE CONFERENCE WITH BROKER REGARDING ADDITIONAL ITEMS FOR SIGNATURE BY PROPOSED BUYER FOR ELECTRA.	B130	0.10	35.00
08/01/23	DNR	REVIEW AND RESPOND TO INVESTOR INQUIRIES.	B110	0.30	105.00
08/01/23	DNR	DISCUSS WITH DEBORAH D. WILLIAMSON AND PROCESS ELECTRA SALE DOCUMENTS.	B130	0.40	140.00
08/01/23	DNR	DRAFT AND FILE NOTICE OF PROPOSED SALE OF REAL PROPERTY FOR ELECTRA.	B130	0.40	140.00
08/01/23	DNR	CORRESPONDENCE FROM OIL AND GAS COUNSEL REGARDING PLUGGING PROPOSAL.	B130	0.10	35.00
08/01/23	DNR	DISCUSS INVESTOR INQUIRY WITH DEBORAH D. WILLIAMSON.	B110	0.10	35.00
08/01/23	DNR	CORRESPONDENCE WITH BROKER REGARDING ELECTRA SALE DOCUMENTS AND TITLE COMPANY ITEMS.	B130	0.20	70.00
08/01/23	TED	ADDRESS INVESTOR INQUIRIES.	B110	0.10	25.65
08/01/23	DNR	RECEIVE AND PROCESS RECEIVER'S MAIL.	B210	0.30	105.00
08/01/23	DNR	CORRESPONDENCE TO AHUJA & CLARK REGARDING LETTER FROM IRS.	B240	0.10	35.00
08/01/23	DNR	DISCUSS WITH DEBORAH D. WILLIAMSON MEDIATION PLANNING.	BT160	0.20	70.00
08/01/23	DNR	RECEIVE AND REVIEW DEEDS OF BAHAMIAN REAL PROPERTY;	B120	1.00	350.00



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DATE	ID	DESCRIPTION	TASK	HOURS	AMOUNT
		DISCUSS SAME WITH DEBORAH D. WILLIAMSON.			
08/01/23	DNR	CORRESPONDENCE WITH COMPUTITLE REGARDING BAHAMAS DEEDS AND INVOICE ISSUES FOR DELIVERY OF SAME.	B120	0.30	105.00
08/01/23	DNR	CORRESPONDENCE TO SEC COUNSEL REGARDING UPDATE ON BAHAMAS REAL PROPERTY.	B120	0.10	35.00
08/01/23	DNR	CORRESPONDENCE TO AUCTIONEER REGARDING CURRENT AUCTION AND PRICING ITEMS FOR SAME.	B130	0.10	35.00
08/01/23	DNR	REVIEW AUCTION REPORT AND DISCUSS WITH DEBORAH D. WILLIAMSON CURRENT PERSONAL PROPERTY AUCTION ITEMS.	B130	0.50	175.00
08/01/23	DNR	TELEPHONE CONFERENCE WITH BROKER REGARDING ELECTRA SALE DOCUMENTS AND TIMELINE.	B130	0.10	35.00
08/01/23	DNR	PREPARE AND SEND PACKAGE TO TITLE COMPANY REGARDING SELLER AUTHORITY DOCUMENTATION FOR ELECTRA SALE.	B130	0.30	105.00
08/01/23	DNR	CORRESPONDENCE TO BROKER REGARDING NOTICE OF PROPOSED SALE OF REAL PROPERTY REGARDING ELECTRA.	B130	0.10	35.00
08/01/23	TEG	(ELECTRA) REVIEW UPDATED CONTRACT, TELEPHONE CONFERENCE WITH D. BEHREND'S REGARDING SAME.	B130	0.70	368.55
08/02/23	TED	ADDRESS INVESTOR INQUIRIES.	B110	0.10	25.65
08/02/23	DNR	CORRESPONDENCE WITH AUCTIONEER REGARDING CURRENT PERSONAL PROPERTY AUCTION.	B130	0.30	105.00
08/02/23	DNR	CORRESPONDENCE WITH AUCTIONEER REGARDING POTENTIAL PRIVATE SALE OF PERSONAL PROPERTY.	B130	0.10	35.00
08/02/23	DNR	CALL WITH DEBORAH D. WILLIAMSON AND BRANDY MANNING REGARDING CLARIFICATION OF MAGISTRATE REPORT AND RECOMMENDATION.	B130	0.30	105.00
08/02/23	DNR	DISCUSS INVESTOR EMAILS WITH DEBORAH D. WILLIAMSON.	B110	0.20	70.00
08/02/23	DNR	RECEIVE AND REVIEW IBC BANK STATEMENTS FOR JULY 2023; SEND TO AHUJA & CLARK.	B210	0.30	105.00
08/02/23	DNR	TELEPHONE CONFERENCE WITH COMPUTITLE REGARDING BAHAMIAN DEEDS FOR REAL PROPERTY.	B120	0.10	35.00
08/02/23	DNR	CORRESPONDENCE WITH REID COLLINS REGARDING DOCUMENT REQUESTS OF OPPOSING COUNSEL.	BT160	0.20	70.00
08/02/23	DNR	ANALYZE CLAIM INFORMATION PRIOR TO CALL WITH REID COLLINS.	BT160	0.30	105.00
08/02/23	DNR	RECEIVE AND PROCESS RECEIVER'S MAIL.	B210	0.30	105.00
08/02/23	DNR	SEND COMPLIANCE TEAM RAILROAD COMMISSION MAIL	B210	0.10	35.00



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DEBORAH WILLIAMSON

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DATE	ID	DESCRIPTION	TASK	HOURS	AMOUNT
		RECEIVED.			
08/02/23	DNR	CALL WITH REID COLLINS AND DEBORAH D. WILLIAMSON REGARDING MEDIATION AND CAUSES OF ACTION.	BT160	0.40	140.00
08/02/23	DNR	CORRESPONDENCE FROM POTENTIAL BUYER COUNSEL AND RAILROAD COMMISSION REGARDING GOOD FAITH CLAIM HEARING ON AUGUST 4, 2023.	B130	0.20	70.00
08/02/23	DNR	CORRESPONDENCE WITH CONTRACT OPERATOR REGARDING INSURANCE COVERAGE; REVIEW WELL SCHEDULE FOR SAME.	B210	0.30	105.00
08/02/23	DNR	CORRESPONDENCE WITH DEBORAH D. WILLIAMSON REGARDING THIRD PARTY CAUSES OF ACTION AND DEMANDS.	BT160	0.10	35.00
08/02/23	DNR	CORRESPONDENCE WITH DEBORAH D. WILLIAMSON AND BRANDY MANNING REGARDING RECEIVER'S CLARIFICATION TO REPORT AND RECOMMENDATION DRAFT.	B130	0.10	35.00
08/02/23	DNR	ANALYZE PLEADINGS AND EVIDENCE AND DRAFT RECEIVER'S CLARIFICATION TO MAGISTRATE'S REPORT AND RECOMMENDATION.	B130	1.60	560.00
08/02/23	DNR	PROVIDE UPDATE ON BANK ACCOUNTS TO DEBORAH D. WILLIAMSON REGARDING INTEREST.	B210	0.20	70.00
08/02/23	DNR	CORRESPONDENCE WITH REID COLLINS REGARDING CALL WITH MEDIATOR.	BT160	0.20	70.00
08/03/23	DNR	TELEPHONE CONFERENCE WITH LOCAL COUNSEL REGARDING CASE STATUS AND OUTSTANDING ISSUES.	B110	0.80	280.00
08/03/23	DNR	CORRESPONDENCE TO AHUJA & CLARK REGARDING OPTIONS FOR RESOLUTION OF SOCIAL SECURITY ADMINISTRATION AND IRS ISSUES.	B240	0.10	35.00
08/03/23	DNR	CORRESPONDENCE WITH AUCTIONEER REGARDING PRIVATE SALE AND OFFER FOR CERTAIN PERSONAL PROPERTY.	B130	0.50	175.00
08/03/23	DNR	CORRESPONDENCE FROM FARMEE COUNSEL REGARDING POST-EFFECTIVE EXPENSES.	B130	0.10	35.00
08/03/23	DNR	CORRESPONDENCE WITH DARRELL R. JONES AND DEBORAH D. WILLIAMSON REGARDING POST-EFFECTIVE EXPENSES FOR VAL VERDE AND CROCKETT COUNTIES.	B130	0.30	105.00
08/03/23	DNR	CORRESPONDENCE TO CONTRACT OPERATOR AND VICKI PALMOUR CONSULTING REGARDING RANGER GAS STATEMENT FOR JUNE 2023.	B210	0.10	35.00
08/03/23	DNR	CORRESPONDENCE WITH WESTERN ALLIANCE BANK REGARDING ACCOUNT AND INTEREST ITEMS.	B210	0.40	140.00



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DEBORAH WILLIAMSON

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DATE	ID	DESCRIPTION	TASK	HOURS	AMOUNT
08/03/23	DNR	DISCUSS WESTERN ALLIANCE BANK STATEMENTS AND ACCOUNT AGREEMENT ITEMS WITH DEBORAH D. WILLIAMSON.	B210	0.20	70.00
08/03/23	DNR	RECEIVE AND REVIEW WESTERN ALLIANCE BANK JULY 2023 BANK STATEMENT; SEND TO AHUJA & CLARK.	B210	0.20	70.00
08/03/23	TED	ADDRESS INVESTOR INQUIRIES.	B110	0.20	51.30
08/03/23	DNR	CORRESPONDENCE WITH OIL AND GAS COUNSEL REGARDING POTENTIAL PLUGGING PROPOSAL.	B130	0.20	70.00
08/03/23	DNR	TELEPHONE CONFERENCE WITH CA FRANCHISE TAX BOARD REGARDING HEARTLAND PAR.	B240	0.10	35.00
08/03/23	DNR	PROVIDE UPDATE TO DEBORAH D. WILLIAMSON AND AHUJA & CLARK REGARDING CA FRANCHISE TAX BOARD.	B240	0.10	35.00
08/03/23	DNR	RECEIVE AND PROCESS RECEIVER'S MAIL.	B210	0.40	140.00
08/03/23	DNR	TELEPHONE CONFERENCE WITH CITY OF ELECTRA REGARDING UTILITY BILL.	B210	0.10	35.00
08/03/23	DNR	CORRESPONDENCE WITH BROKER REGARDING COUNTERSIGNED SALE DOCUMENTS FOR ELECTRA.	B130	0.20	70.00
08/03/23	DNR	CORRESPONDENCE WITH SEC COUNSEL REGARDING BAHAMAS REAL PROPERTY.	B120	0.20	70.00
08/03/23	DNR	CONFERENCE WITH DEBORAH D. WILLIAMSON AND SEC COUNSEL REGARDING RECOVERY OF RECEIVERSHIP PROPERTY.	B120	0.50	175.00
08/03/23	DNR	CORRESPONDENCE WITH GULF COAST REGARDING RECEIVERSHIP ENTITIES.	B210	0.20	70.00
08/03/23	DNR	CORRESPONDENCE WITH BROKER REGARDING ELDORADO RANCH AND LIVESTOCK.	B210	0.20	70.00
08/03/23	DNR	TELEPHONE CONFERENCE WITH OIL AND GAS COUNSEL REGARDING PLUGGING PROPOSAL.	B130	0.30	105.00
08/03/23	DNR	DISCUSS WITH DEBORAH D. WILLIAMSON THIRD PARTY CAUSES OF ACTION.	BT160	0.50	175.00
08/03/23	DNR	CORRESPONDENCE FROM POTENTIAL BUYER COUNSEL REGARDING REVISED EXHIBITS AND LIST FOR GOOD FAITH CLAIM HEARING; REVIEW SAME.	B130	0.30	105.00
08/03/23	DNR	CORRESPONDENCE TO LANDMAN REGARDING RECORD SEARCH FOR CANADIAN ENTITY INVOLVING OIL AND GAS PROPERTIES.	B120	0.10	35.00
08/04/23	DNR	CORRESPONDENCE FROM POTENTIAL BUYER COUNSEL REGARDING UPDATED EXHIBIT LIST FOR GOOD FAITH CLAIM	B130	0.10	35.00



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		HEARING.			
08/04/23	DNR	CORRESPONDENCE WITH GULF COAST GAS REGARDING CALL AND RECEIVERSHIP GAS ACCOUNTS.	B210	0.20	70.00
08/04/23	DNR	MONITOR RAILROAD COMMISSION GOOD FAITH CLAIM HEARING.	B130	0.80	280.00
08/04/23	DNR	CORRESPONDENCE TO ROYALTY OWNER REGARDING DIVISION ORDER PACKAGE.	B110	0.10	35.00
08/04/23	DNR	RECEIVE AND PROCESS RECEIVER'S MAIL.	B210	0.30	105.00
08/04/23	DNR	CORRESPONDENCE TO VICKI PALMOUR CONSULTING REGARDING DIVISION ORDER AND ROYALTY PROCESSING.	B210	0.10	35.00
08/04/23	DNR	CORRESPONDENCE WITH POTENTIAL BUYER COUNSEL REGARDING ADDITIONAL GOOD FAITH CLAIM EXHIBITS AND COURT ORDER REGARDING OIL AND GAS SALE PROCEDURES.	B130	0.20	70.00
08/04/23	TED	ADDRESS INVESTOR INQUIRIES.	B110	0.20	51.30
08/04/23	DNR	TELEPHONE CONFERENCE WITH POTENTIAL BUYER COUNSEL REGARDING GOOD FAITH CLAIM HEARING AND WITHDRAWALS OF CERTAIN DOCKETS.	B130	0.40	140.00
08/04/23	DNR	CORRESPONDENCE WITH CONTRACT OPERATOR AND VICKI PALMOUR CONSULTING REGARDING PRODUCTION STATEMENTS NOT RECEIVED.	B210	0.20	70.00
08/04/23	DNR	RECEIVE AND REVIEW EXECUTED DIVISION ORDER PACKAGE.	B210	0.10	35.00
08/04/23	DNR	RECEIVE AND RESPOND TO INVESTOR INQUIRIES.	B110	0.20	70.00
08/04/23	DNR	CORRESPONDENCE TO AHUJA & CLARK REGARDING OUTSTANDING ANALYSIS DELIVERABLES TO RECEIVER.	B120	0.10	35.00
08/04/23	DNR	TELEPHONE CONFERENCE WITH DEBORAH D. WILLIAMSON REGARDING RAILROAD COMMISSION GOOD FAITH CLAIM HEARING.	B130	0.20	70.00
08/04/23	DNR	TELEPHONE CONFERENCES WITH AUCTIONEER REGARDING PERSONAL PROPERTY AUCTION BIDS AND ISSUES ON SAME.	B130	0.20	70.00
08/04/23	DNR	TELEPHONE CONFERENCE WITH DEBORAH D. WILLIAMSON REGARDING PERSONAL PROPERTY AUCTION PRICING ITEMS.	B130	0.10	35.00
08/04/23	DNR	CORRESPONDENCE WITH AHUJA & CLARK REGARDING FUND ANALYSIS SPREADSHEETS.	B120	0.30	105.00
08/04/23	DNR	TELEPHONE CONFERENCE AND CORRESPONDENCE WITH BRANDY MANNING REGARDING RECEIVER'S CLARIFICATION DRAFT AND COMMENTS THERETO.	B130	0.20	70.00



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DATE	ID	DESCRIPTION	TASK	HOURS	AMOUNT
08/04/23	DNR	TELEPHONE CONFERENCE AND CORRESPONDENCE WITH BRANDY MANNING REGARDING RECEIVER'S CLARIFICATION TO REPORT AND RECOMMENDATION AND COMMENTS ON SAME.	B130	0.20	70.00
08/04/23	DNR	REVISE RECEIVER'S CLARIFICATION TO REPORT AND RECOMMENDATION.	B130	0.10	35.00
08/04/23	DNR	TELEPHONE CONFERENCE WITH GULF COAST GAS REGARDING RECEIVERSHIP LETTER AND ORDER AND PAYMENT ISSUES FOR NON-FARMOUT PROPERTIES.	B210	0.20	70.00
08/04/23	DNR	CORRESPONDENCE WITH GULF COAST AND ENTERPRISE REGARDING RECEIVERSHIP ENTITY PAYMENTS.	B210	0.10	35.00
08/04/23	DNR	CORRESPONDENCE TO FARMEE COUNSEL REGARDING GULF COAST REFUND ON PRE-RECEIVERSHIP AMOUNTS.	B210	0.10	35.00
08/04/23	DNR	CORRESPONDENCE FROM DEBORAH D. WILLIAMSON REGARDING WESTERN ALLIANCE BANK STATEMENT; LOG ON PORTAL AND ADDRESS SAME.	B210	0.10	35.00
08/04/23	DNR	TELEPHONE CONFERENCE WITH CONTRACT OPERATOR REGARDING RAILROAD COMMISSION AND GATHERING COMPANY ISSUES.	B210	0.20	70.00
08/04/23	DNR	CORRESPONDENCE TO DARRELL R. JONES REGARDING GOOD FAITH CLAIM HEARING.	B130	0.10	35.00
08/04/23	DNR	RECEIVE AND REVIEW POTENTIAL BUYER'S CORRECTED AND LATE-FILED EXHIBITS FOR GOOD FAITH CLAIM HEARING; SEND TO DARRELL R. JONES.	B130	0.40	140.00
08/04/23	DNR	REVIEW AND PREPARE ITEMS FOR CONSIDERATION BY DEBORAH D. WILLIAMSON FOR MEDIATION.	BT160	0.30	105.00
08/07/23	DNR	REPORT FOR COMPLIANCE CALL WITH TEAM.	B210	1.10	385.00
08/07/23	DNR	CORRESPONDENCE TO VICKI PALMOUR CONSULTING REGARDING NEW DIVISION ORDER PACKAGE AND CHANGE OF INTEREST.	B210	0.10	35.00
08/07/23	DNR	RECEIVE AND REVIEW CLEANUP MEMO FROM CONTRACT OPERATOR REGARDING NEW ALLEGED RAILROAD COMMISSION VIOLATION.	B210	0.20	70.00
08/07/23	DNR	REVIEW POTENTIAL OPTIONS FOR TAX AND PAYROLL DOCUMENTS; CORRESPONDENCE WITH AHUJA & CLARK ON SAME.	B240	0.30	105.00
08/07/23	DNR	CORRESPONDENCE WITH REID COLLINS REGARDING ADDITIONAL DOCUMENT REQUESTS OF OPPOSING COUNSEL.	BT160	0.20	70.00
08/07/23	DNR	TELEPHONE CONFERENCE WITH INVESTOR REGARDING	B110	0.30	105.00



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		INVESTOR CORRESPONDENCES FROM RECEIVER; SUBSEQUENT CORRESPONDENCE TO PROVIDE SAME.			
08/07/23	DNR	RECEIVE FROM AHUJA & CLARK REGARDING INVESTMENT FUND SUMMARY.	B240	0.10	35.00
08/07/23	DNR	RECEIVE AND PROCESS RECEIVER'S MAIL.	B210	0.50	175.00
08/07/23	DNR	CORRESPONDENCE WITH DEBORAH D. WILLIAMSON REGARDING RECEIVER'S CLARIFICATION TO MAGISTRATE'S REPORT AND RECOMMENDATION.	B130	0.20	70.00
08/07/23	DNR	REVIEW DRAFT EMPLOYER AND PAYROLL DOCUMENTS OF AOS SENT BY AHUJA & CLARK; SUBSEQUENT CORRESPONDENCE WITH AHUJA & CLARK AND DEBORAH D. WILLIAMSON REGARDING SAME.	B240	0.50	175.00
08/07/23	DNR	TELEPHONE CONFERENCE AND CORRESPONDENCE WITH REID COLLINS REGARDING OPPOSING COUNSEL'S ADDITIONAL DOCUMENT REQUESTS; REVIEW MATERIALS REGARDING SAME.	BT160	0.60	210.00
08/07/23	DNR	DISCUSS WITH DEBORAH D. WILLIAMSON ADDITIONAL DOCUMENT REQUESTS OF OPPOSING COUNSEL.	BT160	0.10	35.00
08/07/23	DNR	CORRESPONDENCE TO COMPTROLLER REGARDING DIESEL FUEL TAX REPORT ISSUES.	B240	0.10	35.00
08/07/23	DNR	TELEPHONE CONFERENCE WITH COURTROOM DEPUTY REGARDING RECEIVER'S CLARIFICATION TO MAGISTRATE'S REPORT AND RECOMMENDATION.	B130	0.10	35.00
08/07/23	DNR	CORRESPONDENCE WITH DEBORAH D. WILLIAMSON REGARDING TOLLING AGREEMENT EXTENSION.	BT160	0.20	70.00
08/07/23	DNR	REVISE, FINALIZE, AND FILE RECEIVER'S CLARIFICATION TO MAGISTRATE'S REPORT AND RECOMMENDATION.	B130	0.20	70.00
08/07/23	DNR	CORRESPONDENCE WITH AUCTIONEER REGARDING PERSONAL PROPERTY AUCTION RESULTS; UPDATE DEBORAH D. WILLIAMSON REGARDING SAME.	B130	0.30	105.00
08/07/23	DNR	TELEPHONE CONFERENCE WITH AUCTIONEER REGARDING PERSONAL PROPERTY AUCTION CLOSING ISSUES; UPDATE DEBORAH D. WILLIAMSON REGARDING SAME.	B130	0.30	105.00
08/08/23	DNR	CORRESPONDENCE WITH POTENTIAL PURCHASER REGARDING HIGHER OFFER FOR ELECTRA PROPERTY.	B130	0.20	70.00
08/08/23	DNR	TELEPHONE CONFERENCE WITH TERESA E. GILTNER REGARDING HIGHER OFFER AND ELECTRA CONTRACT ITEMS.	B130	0.20	70.00
08/08/23	DNR	CORRESPONDENCE WITH SEC COUNSEL REGARDING INVESTOR	B110	0.30	105.00



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DATE	ID	DESCRIPTION	TASK	HOURS	AMOUNT
		INQUIRIES.			
08/08/23	DNR	CORRESPONDENCE FROM LANDOWNER REGARDING STATUS OF ABANDONMENT AND PROCESS.	B110	0.10	35.00
08/08/23	DNR	CORRESPONDENCE TO DEBORAH D. WILLIAMSON AND OIL AND GAS COUNSEL REGARDING ABANDONMENT PROCESS.	B130	0.10	35.00
08/08/23	DNR	TELEPHONE CONFERENCES WITH AUCTIONEER REGARDING PERSONAL PROPERTY AUCTION AND CLOSING ISSUES.	B130	0.30	105.00
08/08/23	DNR	REPORT FOR ACCOUNTING AND TAX CALL WITH AHUJA & CLARK.	B240	1.00	350.00
08/08/23	DNR	TELEPHONE CONFERENCE WITH REID COLLINS REGARDING UPCOMING MEDIATION.	BT160	0.30	105.00
08/08/23	DNR	REVIEW AND RESPOND TO INVESTOR INQUIRIES; SUBSEQUENT TELEPHONE CONFERENCE WITH INVESTOR REGARDING RESPONSE.	B110	0.50	175.00
08/08/23	DNR	CALL WITH DEBORAH D. WILLIAMSON AND BROKER REGARDING HIGHER OFFER AND ELECTRA CONTRACT ISSUES.	B130	0.20	70.00
08/08/23	DNR	DISCUSS WITH DEBORAH D. WILLIAMSON PAYROLL AND TAX DOCUMENT ISSUES.	B240	0.20	70.00
08/08/23	DNR	CORRESPONDENCE WITH AHUJA & CLARK REGARDING PAYROLL TAX FORMS AND SOCIAL SECURITY ADMINISTRATION ISSUES FOR AOS; REVIEW DRAFT OF SAME.	B240	0.30	105.00
08/08/23	DNR	DISCUSS WITH DEBORAH D. WILLIAMSON PERSONAL PROPERTY AUCTION BACKUP BIDS AND ISSUES ON SAME.	B130	0.20	70.00
08/08/23	DNR	REVIEW INFORMATION REGARDING DOCUMENT REQUESTS FOR UPCOMING MEDIATION.	BT160	0.20	70.00
08/08/23	DNR	CORRESPONDENCE WITH REID COLLINS REGARDING UPCOMING MEDIATION ITEMS.	BT160	0.10	35.00
08/08/23	DNR	CORRESPONDENCE WITH REID COLLINS REGARDING TOLLING AGREEMENT EXTENSION.	BT160	0.20	70.00
08/08/23	DNR	REVIEW AND PROCESS TOLLING AGREEMENT EXTENSION.	BT160	0.20	70.00
08/08/23	DNR	BEGIN REVIEW AND COMMENT ON DRAFT MEDIATION STATEMENT.	BT160	0.70	245.00
08/08/23	TED	ADDRESS INVESTOR INQUIRIES.	B110	0.50	128.25
08/09/23	DNR	TELEPHONE CONFERENCE WITH TERESA E. GILTNER REGARDING HIGHER OFFER AND REQUEST FOR CHANGE OF SALE TERMS.	B130	0.20	70.00



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08/09/23	DNR	CORRESPONDENCE FROM INTERESTED PURCHASER REPRESENTATIVE REGARDING HIGHER OFFER FOR ELECTRA.	B130	0.10	35.00
08/09/23	DNR	DISCUSS WITH DEBORAH D. WILLIAMSON HIGHER OFFER AND SALE TERMS OF ELECTRA.	B130	0.30	105.00
08/09/23	DNR	TELEPHONE CONFERENCE WITH AUCTIONEER REGARDING CLOSING OF PERSONAL PROPERTY AUCTION AND EXPENSES FOR SAME.	B130	0.20	70.00
08/09/23	DNR	CALL WITH DEBORAH D. WILLIAMSON AND REID COLLINS REGARDING MEDIATION STATEMENT.	BT160	0.70	245.00
08/09/23	DNR	RECEIVE AND PROCESS RECEIVER'S MAIL.	B210	0.40	140.00
08/09/23	DNR	SEND RAILROAD COMMISSION MAIL TO COMPLIANCE TEAM.	B210	0.10	35.00
08/09/23	DNR	DISCUSS WITH DEBORAH D. WILLIAMSON TESTIMONY OF PRIOR INTERVIEWS.	BT160	0.40	140.00
08/09/23	DNR	ANALYZE AND EDIT MEDIATION STATEMENT.	BT160	0.50	175.00
08/09/23	DNR	TELEPHONE CONFERENCE WITH REID COLLINS REGARDING MEDIATION DOCUMENT REQUESTS.	BT160	0.30	105.00
08/10/23	DNR	REVIEW TESTIMONY OF DEFENDANT REGARDING INVESTMENT FUNDS AND SETUP.	B120	2.00	700.00
08/10/23	DNR	CORRESPONDENCE WITH ENTERPRISE REGARDING REFUND PAYMENT AND RECEIVERSHIP BACKGROUND.	B210	0.20	70.00
08/10/23	DNR	CORRESPONDENCE WITH AHUJA & CLARK REGARDING INVESTMENT ANALYSIS SPREADSHEETS.	B120	0.20	70.00
08/11/23	TED	ADDRESS INVESTOR INQUIRIES.	B110	0.50	128.25
08/14/23	TED	ADDRESS INVESTOR INQUIRIES.	B110	0.10	25.65
08/14/23	DNR	CORRESPONDENCE WITH LANDMAN REGARDING TITLE SEARCH FOR CANADIAN ENTITY.	B120	0.20	70.00
08/14/23	DNR	COMPLIANCE CALL WITH TEAM.	B210	0.60	210.00
08/14/23	DNR	RECEIVE AND REVIEW SUTTON COUNTY GAS STATEMENT FROM GULF COAST; SEND TO VICKI PALMOUR CONSULTING AND CONTRACT OPERATOR.	B210	0.20	70.00
08/14/23	DNR	PREPARE AND SEND PACKAGE RESPONDING TO SOCIAL SECURITY ADMINISTRATION QUESTIONNAIRE AND EXTENSION REQUEST FOR HEARTLAND GROUP VENTURES.	B240	0.40	140.00
08/14/23	DNR	PREPARE AND SEND PACKAGE RESPONDING TO SOCIAL SECURITY ADMINISTRATION QUESTIONNAIRE AND EXTENSION REQUEST FOR AOS.	B240	0.40	140.00



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08/14/23	DNR	CORRESPONDENCE WITH AHUJA & CLARK REGARDING SOCIAL SECURITY ADMINISTRATION RESPONSE LETTERS AND STATUS OF PAYROLL FORMS.	B240	0.30	105.00
08/14/23	DNR	TELEPHONE CONFERENCE WITH TERESA E. GILTNER AND BROKER REGARDING HIGHER OFFER AND CONTRACTS FOR ELECTRA.	B130	0.10	35.00
08/14/23	DNR	CORRESPONDENCE WITH TERESA E. GILTNER AND BROKER REGARDING OFFERS FOR ELECTRA AND NEXT STEPS PER COURT-APPROVED PROCEDURES.	B130	0.40	140.00
08/14/23	DNR	RECEIVE UPDATE FROM CONTRACT OPERATOR REGARDING VAL VERDE AND CROCKETT COUNTIES.	B210	0.10	35.00
08/14/23	DNR	TELEPHONE CONFERENCE WITH OIL AND GAS COUNSEL REGARDING PLUGGING PROPOSAL UPDATE.	B130	0.10	35.00
08/14/23	DNR	CORRESPONDENCE WITH AHUJA & CLARK REGARDING IRS MAIL AND REGARDING-SUBMISSION OF FORMS.	B240	0.30	105.00
08/14/23	DNR	CORRESPONDENCE TO AUCTIONEER REGARDING AUCTION REPORT.	B130	0.10	35.00
08/14/23	DNR	REVIEW SUBMITTED MATERIALS PRIOR TO MEDIATION.	BT160	1.50	525.00
08/14/23	DNR	CORRESPONDENCE WITH VICKI PALMOUR CONSULTING REGARDING GENERAL LAND OFFICE REPORTS AND PAYMENTS DUE ON SAME; REVIEW SAME.	B210	0.30	105.00
08/14/23	DNR	CORRESPONDENCE WITH AHUJA & CLARK REGARDING SINGLE MEMBER LLC TAXES AND FORMS REGARDING SAME.	B240	0.20	70.00
08/14/23	DNR	CORRESPONDENCE WITH AHUJA & CLARK REGARDING DALLAS RESOURCES TAX RETURN ITEMS.	B240	0.20	70.00
08/14/23	DNR	RECEIVE AND REVIEW INFORMATION FROM CONTRACT OPERATOR REGARDING GOOD FAITH CLAIM HEARING AND STATUS OF BUYER ISSUES.	B130	0.10	35.00
08/15/23	DNR	CORRESPONDENCE WITH DEBORAH D. WILLIAMSON AND SEC COUNSEL REGARDING ORDER VACATING REPORT AND RECOMMENDATION.	B130	0.30	105.00
08/15/23	DNR	REVIEW ORDER VACATING JULY 2023 REPORT AND RECOMMENDATION.	B130	0.10	35.00
08/15/23	DNR	RECEIVE AND REVIEW IBC BANK ACCOUNT ANALYSIS; SEND TO AHUJA & CLARK.	B210	0.20	70.00
08/15/23	DNR	REVIEW AMENDED REPORT AND RECOMMENDATION ON ABANDONMENT AND PIPELINE MOTIONS.	B130	0.20	70.00



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08/15/23	DNR	REVIEW ORDER SETTING HEARING ON SEPTEMBER 7, 2023.	B110	0.10	35.00
08/15/23	DNR	PREPARE AND FILE NOTICE OF SEPTEMBER 7, 2023 HEARING AND SERVICE OF COURT ORDER.	B110	0.30	105.00
08/15/23	TED	ADDRESS INVESTOR INQUIRIES.	B110	0.10	25.65
08/15/23	DNR	REVIEW AND RESPOND TO INVESTOR INQUIRIES.	B110	0.20	70.00
08/15/23	DNR	TELEPHONE CONFERENCE WITH AUCTIONEER REGARDING CLOSING PERSONAL PROPERTY AUCTION ITEMS.	B130	0.10	35.00
08/15/23	DNR	CORRESPONDENCE TO AHUJA & CLARK REGARDING IRS MAIL RECEIVED REGARDING CARSON PENALTY WAIVER.	B240	0.10	35.00
08/15/23	DNR	REVIEW AND PROCESS RECEIVER'S MAIL.	B210	0.70	245.00
08/15/23	DNR	CORRESPONDENCE WITH TERESA E. GILTNER REGARDING REVISED CONTRACTS FOR ELECTRA PROPERTY.	B130	0.20	70.00
08/15/23	DNR	CORRESPONDENCE TO YCAD COUNSEL REGARDING NOTICE OF INTENTION TO FORECLOSE REGARDING ARCOOIL CORP.	B240	0.10	35.00
08/15/23	DNR	CORRESPONDENCE TO COMPLIANCE TEAM REGARDING RAILROAD COMMISSION MAIL RECEIVED.	B210	0.10	35.00
08/15/23	DNR	CORRESPONDENCE WITH REID COLLINS AND DEBORAH D. WILLIAMSON REGARDING PREPARATION ITEMS FOR MEDIATION.	BT160	0.10	35.00
08/15/23	DNR	REVIEW AIRCRAFT SALE DOCUMENTS AND PREPARE CORRESPONDENCE TO BUYER REPRESENTATIVE REGARDING FLIGHT HISTORY.	B130	0.20	70.00
08/15/23	DNR	REVIEW TESTIMONY OF DEFENDANT REGARDING INVESTMENT FUNDS AND SETUP.	B120	2.50	875.00
08/16/23	TED	ADDRESS INVESTOR INQUIRIES.	B110	0.10	25.65
08/16/23	DNR	CORRESPONDENCE WITH YCAD COUNSEL REGARDING NOTICE OF FORECLOSURE AND RECEIVERSHIP ORDER ISSUES.	B240	0.20	70.00
08/16/23	DNR	CORRESPONDENCE AND TELEPHONE CONFERENCE WITH AHUJA & CLARK AND DEBORAH D. WILLIAMSON REGARDING TIEP INVESTMENT ANALYSIS.	B120	0.20	70.00
08/16/23	DNR	PREPARE AND SEND ROYALTY PAYMENT AND REPORTS TO GENERAL LAND OFFICE OUTSTANDING FOR BARRON PETROLEUM.	B210	0.40	140.00
08/16/23	DNR	CORRESPONDENCE WITH BROKER REGARDING HIGHER OFFER SALE DOCUMENTS FOR ELECTRA.	B130	0.40	140.00
08/16/23	DNR	DISCUSS AND PROCESS HIGHER OFFER SALE ELECTRA	B130	0.20	70.00



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		DOCUMENTS WITH DEBORAH D. WILLIAMSON.			
08/16/23	DNR	TELEPHONE CONFERENCE WITH AHUJA & CLARK REGARDING INVESTOR TAX DOCUMENTS REQUESTED.	B240	0.10	35.00
08/16/23	DNR	REVIEW AND RESPOND TO INVESTOR INQUIRIES.	B110	0.40	140.00
08/16/23	DNR	DISCUSS WITH DEBORAH D. WILLIAMSON INVESTMENT-SPECIFIC INQUIRY RESPONSE.	B110	0.10	35.00
08/16/23	DNR	CORRESPONDENCE WITH JEANMARIE BAER REGARDING SCHLEICHER COUNTY NOTICE OF TAX LIEN FOR BARRON PETROLEUM.	B240	0.30	105.00
08/16/23	DNR	TELEPHONE CONFERENCE WITH INVESTOR COUNSEL REGARDING CASE STATUS.	B110	0.10	35.00
08/16/23	DNR	CORRESPONDENCE WITH AHUJA & CLARK REGARDING TIEP INVESTMENT ANALYSIS INFORMATION.	B120	0.30	105.00
08/16/23	DNR	CALL WITH DEBORAH D. WILLIAMSON AND REID COLLINS IN PREPARATION FOR MEDIATION.	BT160	0.60	210.00
08/16/23	DNR	REVIEW NOTICE OF ATTORNEY RETENTION OF MONROSE SAHOTA AND SUNNY SAHOTA.	B110	0.20	70.00
08/16/23	DNR	CORRESPONDENCE WITH DEBORAH D. WILLIAMSON AND LANDMAN REGARDING TITLE SEARCHES FOR RECEIVERSHIP ENTITIES.	B120	0.20	70.00
08/16/23	DNR	CORRESPONDENCE TO SCHLEICHER CAD COUNSEL REGARDING NOTICE OF TAX LIEN.	B240	0.10	35.00
08/16/23	DNR	PREPARE CERTIFICATE OF NO OBJECTION ON MOTION TO SELL CERTAIN JEWELRY.	B130	0.20	70.00
08/16/23	DNR	PREPARE WITNESS AND EXHIBIT LIST FOR AUGUST 23, 2023 HEARING.	B110	0.20	70.00
08/16/23	DNR	DISCUSS HEARING ITEMS REGARDING MOTION TO SELL CERTAIN JEWELRY WITH DEBORAH D. WILLIAMSON.	B130	0.20	70.00
08/16/23	DNR	CORRESPONDENCE TO AHUJA & CLARK REGARDING INVESTMENT-SPECIFIC INQUIRY.	B120	0.10	35.00
08/16/23	DNR	RECEIVE AND PROCESS RECEIVER'S MAIL.	B210	0.40	140.00
08/17/23	DNR	CORRESPONDENCE WITH SCHLEICHER CAD COUNSEL REGARDING OIL AND GAS SALES DOCUMENTATION AND NOTICE OF TAX LIEN FOR BARRON PETROLEUM.	B240	0.30	105.00
08/17/23	DNR	CORRESPONDENCE WITH VICKI PALMOUR CONSULTING REGARDING GENERAL LAND OFFICE REPORTING.	B210	0.20	70.00



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DATE	ID	DESCRIPTION	TASK	HOURS	AMOUNT
08/17/23	DNR	REVIEW AND RESPOND TO INVESTOR INQUIRIES.	B110	0.20	70.00
08/17/23	DNR	CORRESPONDENCE WITH STRETTO REGARDING CLAIMS PROCESS AND SAMPLE FORMS.	B310	0.50	175.00
08/17/23	DNR	TELEPHONE CONFERENCE WITH CONTRACT OPERATOR REGARDING CLEANUP VENDOR ISSUES.	B210	0.10	35.00
08/17/23	DNR	CORRESPONDENCE TO AHUJA & CLARK REGARDING INVESTOR CAPITAL INQUIRY.	B120	0.10	35.00
08/17/23	DNR	REVISE AND FILE CERTIFICATE OF NO OBJECTION TO MOTION TO SELL CERTAIN JEWELRY.	B130	0.20	70.00
08/17/23	DNR	FINALIZE, COMPILE EXHIBITS, AND FILE WITNESS AND EXHIBIT LIST FOR HEARING ON AUGUST 23, 2023.	B130	0.20	70.00
08/17/23	DNR	TELEPHONE CONFERENCES WITH AUCTIONEER REGARDING POTENTIAL PRIVATE SALE OF PERSONAL PROPERTY.	B130	0.20	70.00
08/17/23	DNR	MEETING WITH AUCTIONEER TO CLOSE OUT FIRST AUCTION OF PERSONAL PROPERTY.	B130	0.20	70.00
08/17/23	DNR	REVIEW AND PROVIDE COMMENTS ON SAMPLE CLAIMS FORM AND NOTICE.	B310	0.40	140.00
08/17/23	DNR	DISCUSS WITH DEBORAH D. WILLIAMSON CLAIM FORM AND NOTICE ITEMS.	B310	0.30	105.00
08/17/23	DNR	CORRESPONDENCE WITH CLEANUP VENDOR REGARDING RECEIVERSHIP ORDER AND CLEANUP JOB.	B210	0.20	70.00
08/17/23	DNR	CORRESPONDENCE WITH DEBORAH D. WILLIAMSON REGARDING FLIGHT HISTORY AND ISSUES REGARDING SOLD AIRPLANE.	B130	0.20	70.00
08/17/23	DNR	CORRESPONDENCE WITH AHUJA & CLARK REGARDING TIEP INVESTMENT ANALYSIS.	B120	0.30	105.00
08/17/23	DNR	TELEPHONE CONFERENCE WITH VENDOR REGARDING INVOICE SUBMISSION TO RECEIVER.	B210	0.10	35.00
08/17/23	DNR	CORRESPONDENCE WITH BUYER REPRESENTATIVE OF PLANE REGARDING REQUEST FOR FLIGHT HISTORY INFORMATION.	B130	0.20	70.00
08/17/23	DNR	CALL WITH STRETTO REGARDING CLAIMS FORMS AND NOTICES FOR CLASSES OF CLAIMANTS.	B310	0.70	245.00
08/17/23	DNR	CORRESPONDENCE WITH VICKI PALMOUR CONSULTING REGARDING WOLFEPAK ACCOUNT ISSUES.	B210	0.20	70.00
08/17/23	DNR	DRAFT AND FILE NOTICE OF FIRST PERSONAL PROPERTY AUCTION RESULTS.	B130	0.50	175.00



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08/17/23	DNR	CORRESPONDENCE WITH LANDOWNER REGARDING ABANDONMENT INQUIRY.	B110	0.40	140.00
08/17/23	DNR	PROVIDE UPDATE TO AHUJA & CLARK REGARDING AIRPLANE TAX RETURN ITEMS.	B240	0.10	35.00
08/17/23	DNR	DISCUSS CLAIM PROCESS WITH DEBORAH D. WILLIAMSON.	B310	0.30	105.00
08/17/23	DNR	PROVIDE UPDATE TO SEC COUNSEL REGARDING FARMOUT.	B130	0.10	35.00
08/17/23	DNR	CORRESPONDENCE WITH DEBORAH D. WILLIAMSON REGARDING FARMOUT UPDATE; REVIEW LETTER FROM SDMB REGARDING SAME.	B130	0.30	105.00
08/17/23	DNR	CORRESPONDENCE TO OIL AND GAS COUNSEL REGARDING DRAFT PLUGGING AGREEMENT.	B130	0.10	35.00
08/17/23	DNR	CORRESPONDENCE TO REID COLLINS REGARDING DOCUMENT PRODUCTION FOR MEDIATION.	BT160	0.10	35.00
08/17/23	DNR	DRAFT CLAIMS MOTION.	B310	0.50	175.00
08/17/23	DNR	ANALYZE DOCUMENTS PRIOR TO MEDIATOR CALL.	BT160	1.00	350.00
08/18/23	DNR	CORRESPONDENCE WITH STRETTO AND DEBORAH D. WILLIAMSON REGARDING SECURE FILE TRANSFER FOR CLAIMS DATABASE.	B310	0.30	105.00
08/18/23	DNR	CALL WITH MEDIATOR.	BT160	0.20	70.00
08/18/23	DNR	CORRESPONDENCE FROM ROGER SAHOTA REGARDING COUNSEL FOR BAHAMAS REAL PROPERTIES.	B110	0.10	35.00
08/18/23	DNR	REVIEW AND RESPOND TO INVESTOR INQUIRIES.	B110	0.20	70.00
08/18/23	DNR	RECEIVE AND REVIEW DEED RECORD SEARCH RESULTS REGARDING CANADIAN ENTITY.	B120	0.20	70.00
08/18/23	DNR	CORRESPONDENCE WITH LANDMAN REGARDING DEED SEARCHES FOR RECEIVERSHIP PARTIES.	B120	0.20	70.00
08/18/23	DNR	TELEPHONE CONFERENCE WITH TERESA E. GILTNER REGARDING TURNOVER AND CONVEYANCE ITEMS FOR BAHAMAS PROPERTIES.	B120	0.20	70.00
08/18/23	DNR	RECEIVE UPDATED TIEP INVESTMENT ANALYSIS FROM AHUJA & CLARK.	B120	0.10	35.00
08/18/23	TED	ADDRESS INVESTOR INQUIRIES.	B110	0.30	76.95
08/18/23	DNR	CALL WITH AHUJA & CLARK REGARDING TIEP INVESTOR ANALYSIS SPREADSHEET AND INVESTMENT INFORMATION.	B120	0.60	210.00
08/18/23	DNR	CORRESPONDENCE WITH VICKI PALMOUR CONSULTING REGARDING ARCOOIL NATURAL GAS REPORT FOR JUNE 2023	B210	0.30	105.00



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DATE	ID	DESCRIPTION	TASK	HOURS	AMOUNT
		AND PAYMENT OF TAXES DUE; REVIEW REPORT FOR FILING.			
08/18/23	DNR	REVIEW ORDER DENYING MOVANT JOHN ROGERS'S MOTION TO LIFT STAY.	B110	0.10	35.00
08/18/23	DNR	PREPARE LENGTHY DEMAND LETTER TO MONROSE SAHOTA AND COUNSEL REGARDING PORT HOWE, CAT ISLAND, BAHAMAS PROPERTY.	B120	2.30	805.00
08/18/23	DNR	CORRESPONDENCE WITH INVESTOR REGARDING TAX DOCUMENT REQUEST.	B110	0.20	70.00
08/18/23	DNR	RECEIVE AND DOWNLOAD DOCUMENT PRODUCTION TO OPPOSING COUNSEL PRIOR TO MEDIATION.	BT160	0.20	70.00
08/18/23	DNR	RECEIVE AND PROCESS RECEIVER'S MAIL.	B210	0.40	140.00
08/18/23	DNR	CORRESPONDENCE TO COMPLIANCE TEAM REGARDING RAILROAD COMMISSION MAIL RECEIVED.	B210	0.10	35.00
08/18/23	DNR	CORRESPONDENCE WITH DEBORAH D. WILLIAMSON REGARDING TAX FILING ITEMS FOR CERTAIN RECEIVERSHIP PARTIES.	B240	0.10	35.00
08/18/23	DNR	CORRESPONDENCE TO ENTERPRISE REGARDING STATUS OF REFUND CHECK.	B210	0.10	35.00
08/18/23	DNR	CORRESPONDENCE WITH VICKI PALMOUR CONSULTING REGARDING WOLFEPAK ACCESS ISSUES.	B210	0.20	70.00
08/18/23	DNR	CORRESPONDENCE WITH CONTRACT PUMPER REGARDING ENVIRONMENTAL NOTICE REGARDING WICHITA COUNTY.	B210	0.20	70.00
08/19/23	DNR	CORRESPONDENCE WITH VICKI PALMOUR CONSULTING REGARDING WOLFEPAK SOFTWARE PAYMENT RENEWAL AND TIMING.	B210	0.20	70.00
08/19/23	DNR	RECEIVE AND PROCESS UTILITY BILL FOR ELECTRA.	B210	0.20	70.00
08/20/23	DNR	DRAFT CLAIMS MOTION.	B310	1.30	455.00
08/21/23	DNR	CORRESPONDENCE WITH AHUJA & CLARK REGARDING SOLVENCY ANALYSIS.	B120	0.30	105.00
08/21/23	DNR	RECEIVE AND PROCESS RECEIVER'S MAIL.	B210	0.40	140.00
08/21/23	DNR	CORRESPONDENCE WITH CONTRACT OPERATOR REGARDING JULY 2023 INVOICE.	B210	0.20	70.00
08/21/23	DNR	CORRESPONDENCE FROM GENERAL LAND OFFICE REGARDING OUTSTANDING PRODUCTION REPORTS; SEND TO VICKI PALMOUR CONSULTING FOR FILING.	B210	0.20	70.00
08/21/23	DNR	CORRESPONDENCE WITH CLEANUP VENDOR REGARDING	B210	0.30	105.00



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		INVOICE.			
08/21/23	DNR	TELEPHONE CONFERENCE WITH CONTRACT OPERATOR REGARDING ENVIRONMENTAL NOTICE FROM RAILROAD COMMISSION.	B210	0.10	35.00
08/21/23	DNR	CORRESPONDENCE WITH PLANE PURCHASER REGARDING FLIGHT HISTORY.	B130	0.20	70.00
08/21/23	DNR	CORRESPONDENCE TO AHUJA & CLARK REGARDING FLIGHT HISTORY AND DALLAS RESOURCES TAX ISSUES.	B240	0.10	35.00
08/21/23	DNR	DRAFT CLAIMS MOTION AND PROPOSED ORDER ON SAME.	B310	3.40	1,190.00
08/21/23	DNR	CORRESPONDENCE TO AHUJA & CLARK REGARDING REQUEST FOR CLAIMS ANALYSIS STATISTICS.	B310	0.10	35.00
08/21/23	DNR	CORRESPONDENCE WITH REID COLLINS REGARDING DOCUMENTS FOR MEDIATION PREPARATION MEETING.	BT160	0.20	70.00
08/21/23	TEG	(ELECTRA) REVIEW RELEASE OF EARNEST MONEY.	B130	0.20	105.30
08/22/23	DNR	CORRESPONDENCE WITH TERESA E. GILTNER REGARDING ELECTRA CONTRACT AND CLOSING TIMELINE.	B130	0.30	105.00
08/22/23	DNR	CORRESPONDENCE FROM TITLE COMPANY, BROKER, AND PURCHASER REGARDING ELECTRA CONTRACT AND EARNEST MONEY.	B130	0.30	105.00
08/22/23	DNR	CORRESPONDENCE WITH AIRPLANE BUYER REGARDING FLIGHT LOGS.	B130	0.20	70.00
08/22/23	TED	ADDRESS INVESTOR INQUIRIES.	B110	0.20	51.30
08/22/23	DNR	PROVIDE UPDATE TO AHUJA & CLARK REGARDING DALLAS RESOURCES TAX INFORMATION.	B240	0.10	35.00
08/22/23	DNR	CORRESPONDENCE WITH AHUJA & CLARK REGARDING INVESTOR CLAIMS ANALYSIS.	B310	0.20	70.00
08/22/23	DNR	TELEPHONE CONFERENCE WITH BROKER REGARDING POTENTIAL INTEREST IN ELDORADO PROPERTY.	B130	0.10	35.00
08/22/23	DNR	REVIEW AND RESPOND TO INVESTOR INQUIRIES.	B110	0.40	140.00
08/22/23	DNR	MEDIATION WITH RECEIVER.	BT160	5.00	1,750.00
08/22/23	TEG	REVIEW RECEIPTED CONTRACT FOR CRITICAL DATES; BEGIN WORK ON DRAFT CLOSING DOCUMENTS.	B130	1.00	526.50
08/22/23	DNR	CORRESPONDENCE FROM COURTROOM DEPUTY REGARDING AUGUST 23, 2023 HEARING CREDENTIALS.	B110	0.10	35.00
08/23/23	DNR	CORRESPONDENCE WITH SCHLEICHER CAD COUNSEL REGARDING NOTICE OF TAX LIEN AND OWNERSHIP TRANSFER	B240	0.20	70.00



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		STATEMENT.			
08/23/23	DNR	CORRESPONDENCE WITH LANDOWNER REGARDING DISTRICT COURT ORDER ENTERED.	B110	0.20	70.00
08/23/23	DNR	APPEAR BEFORE THE HONORABLE HAL R. RAY, JR. ON MOTION TO SELL CERTAIN JEWELRY.	B130	0.30	105.00
08/23/23	DNR	CORRESPONDENCE WITH REID COLLINS REGARDING DOCUMENT REQUESTS OF OPPOSING COUNSEL.	BT160	0.30	105.00
08/23/23	DNR	DISCUSS AND PROCESS VENDOR PAYMENTS WITH DEBORAH D. WILLIAMSON.	B210	0.40	140.00
08/23/23	DNR	CORRESPONDENCE WITH VICKI PALMOUR CONSULTING REGARDING DIVISION ORDER TRANSFER AND DEATH DOCUMENTS OF MINERAL OWNER.	B210	0.20	70.00
08/23/23	DNR	CALL WITH BROKER AND DEBORAH D. WILLIAMSON REGARDING POTENTIAL OWNER FINANCING FOR ELDORADO.	B130	0.30	105.00
08/23/23	DNR	CORRESPONDENCE WITH ROYALTY OWNER REGARDING PAYMENT STATUS.	B110	0.20	70.00
08/23/23	DNR	PULL DOCUMENTS POTENTIALLY RESPONSIVE TO REQUEST OF OPPOSING COUNSEL.	BT160	0.80	280.00
08/23/23	DNR	CORRESPONDENCE WITH REID COLLINS REGARDING ADDITIONAL DOCUMENTS REQUESTED BY OPPOSING COUNSEL.	BT160	0.20	70.00
08/23/23	DNR	CALL WITH AHUJA & CLARK REGARDING INVESTOR CLAIM ANALYSIS AND DATA REQUIRED FOR CLAIMS PROCESS FOR INVESTORS.	B120	1.40	490.00
08/23/23	DNR	TELEPHONE CONFERENCE WITH INVESTOR REGARDING CASE STATUS.	B110	0.20	70.00
08/23/23	TED	ADDRESS INVESTOR INQUIRES.	B110	0.50	128.25
08/23/23	DNR	TELEPHONE CONFERENCE WITH VICKI PALMOUR CONSULTING REGARDING EXPENSES FOR LEASE OPERATING STATEMENTS.	B210	0.10	35.00
08/23/23	DNR	RECEIVE AND REVIEW NEW DIVISION ORDER FROM VICKI PALMOUR CONSULTING.	B210	0.20	70.00
08/23/23	DNR	PREPARE AND SEND NEW DIVISION ORDER PACKAGE TO ROYALTY OWNER.	B210	0.30	105.00
08/23/23	DNR	RECEIVE AND REVIEW JULY 2023 STATEMENT FROM GULF COAST; SEND TO COMPLIANCE TEAM.	B210	0.30	105.00
08/23/23	DNR	TELEPHONE CONFERENCE WITH CONTRACT OPERATOR REGARDING ENVIRONMENTAL ESTIMATE.	B210	0.10	35.00



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08/23/23	DNR	REVIEW ORDER GRANTING MOTION TO SELL CERTAIN JEWELRY.	B130	0.10	35.00
08/23/23	DNR	RECEIVE AND REVIEW ENTITY ANALYSIS SPREADSHEET FROM AHUJA & CLARK.	B120	0.20	70.00
08/23/23	DNR	CORRESPONDENCE WITH AHUJA & CLARK REGARDING ENTITY ANALYSIS SPREADSHEET.	B120	0.20	70.00
08/23/23	DNR	CALL WITH AHUJA & CLARK REGARDING IRS FAX AND WAIVER REQUESTED OF RECEIVER.	B240	0.20	70.00
08/23/23	DNR	CORRESPONDENCE WITH AHUJA & CLARK REGARDING RETURNED IRS MAIL.	B240	0.10	35.00
08/24/23	DNR	CALL WITH IRS APPEALS OFFICER AND AHUJA & CLARK REGARDING SUMMARY NOTICE OF DETERMINATION AND FEDERAL TAX LIEN ISSUES WITH RESPECT TO BARRON PETROLEUM.	B240	0.40	140.00
08/24/23	DNR	REVIEW AND RESPOND TO INVESTOR INQUIRIES.	B110	0.20	70.00
08/24/23	DNR	NUMEROUS TELEPHONE CONFERENCES WITH LANDOWNER REGARDING SURFACE OIL AND GAS EQUIPMENT ISSUES.	B110	0.30	105.00
08/24/23	TED	ADDRESS INVESTOR INQUIRIES.	B110	0.40	102.60
08/24/23	DNR	TELEPHONE CONFERENCE WITH CONTRACT OPERATOR REGARDING LANDOWNER CONTACT AND LEASE INFORMATION ON SAME.	B210	0.10	35.00
08/24/23	DNR	DRAFT AND SEND LENGTHY CORRESPONDENCE TO IRS CASE OFFICER REGARDING RETURNED MAIL AND TIMELY-SUBMITTED RESPONSE REQUESTING COLLECTION DUE PROCESS HEARING AT DIRECTION OF IRS APPEALS OFFICER.	B240	0.40	140.00
08/24/23	DNR	CORRESPONDENCE TO IRS APPEALS OFFICER REGARDING SIGNED SUMMARY NOTICE OF DETERMINATION FOR NOTICE OF INTENT TO LEVY REGARDING BARRON PETROLEUM.	B240	0.10	35.00
08/24/23	DNR	CORRESPONDENCE WITH ROYALTY OWNER REGARDING PAYMENTS OWED INQUIRY.	B110	0.20	70.00
08/24/23	DNR	CORRESPONDENCE TO VICKI PALMOUR CONSULTING REGARDING ROYALTY OWNER INQUIRY.	B210	0.10	35.00
08/24/23	DNR	CORRESPONDENCE WITH REID COLLINS REGARDING ADDITIONAL DOCUMENT REQUESTS OF OPPOSING COUNSEL.	BT160	0.40	140.00
08/24/23	DNR	REVIEW AND EDIT DRAFT PLUGGING AND RESTORATION AGREEMENT.	B130	0.30	105.00
08/24/23	DNR	TELEPHONE CONFERENCE WITH OIL AND GAS COUNSEL REGARDING DRAFT PLUGGING AND RESTORATION	B130	0.20	70.00



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DATE	ID	DESCRIPTION	TASK	HOURS	AMOUNT
		AGREEMENT AND COMMENTS ON SAME.			
08/24/23	DNR	CORRESPONDENCE WITH CONTRACT OPERATOR REGARDING INSURANCE POLICY AND REFUND ISSUES.	B210	0.20	70.00
08/24/23	DNR	SEND RAILROAD COMMISSION MAIL RECEIVED TO COMPLIANCE TEAM.	B210	0.10	35.00
08/24/23	DNR	RECEIVE AND REVIEW RECEIVER'S MAIL.	B210	0.30	105.00
08/24/23	DNR	RECEIVE AND REVIEW ENVIRONMENTAL CLEANUP MEMO FROM CONTRACT OPERATOR.	B210	0.30	105.00
08/24/23	DNR	CORRESPONDENCE TO SEC COUNSEL REGARDING BANK ANALYSIS.	B120	0.10	35.00
08/24/23	DNR	CALL WITH AHUJA & CLARK AND REID COLLINS REGARDING DOCUMENT REQUESTS OF OPPOSING COUNSEL.	BT160	0.40	140.00
08/24/23	DNR	CORRESPONDENCE FROM AHUJA & CLARK REGARDING ENTITY ANALYSIS.	B120	0.10	35.00
08/24/23	DNR	CALL WITH SEC COUNSEL REGARDING DOCUMENT REQUESTS OF OPPOSING COUNSEL.	BT160	0.40	140.00
08/24/23	DNR	PREPARE AND SEND EMPLOYER CERTIFICATION FORM AND RECEIVERSHIP ORDER IN RESPONSE TO CORRESPONDENCE AND WAGE GARNISHMENT ORDER FROM U.S. DEPARTMENT OF TREASURY BUREAU OF THE FISCAL SERVICE.	B210	0.50	175.00
08/24/23	DNR	CORRESPONDENCE WITH COMPLIANCE TEAM REGARDING ENVIRONMENTAL LETTER FROM RAILROAD COMMISSION.	B210	0.20	70.00
08/24/23	DNR	CALL WITH REID COLLINS REGARDING ADDITIONAL DOCUMENT REQUESTS OF OPPOSING COUNSEL.	BT160	0.50	175.00
08/24/23	DNR	CORRESPONDENCE WITH AHUJA & CLARK REGARDING BANK SPREADSHEETS.	B120	0.30	105.00
08/25/23	DNR	CORRESPONDENCE WITH DEBORAH D. WILLIAMSON REGARDING DATA HOSTING WIRE FOR SEPTEMBER 2023.	B210	0.10	35.00
08/25/23	DNR	DRAFT DATA HOSTING WIRE FOR SEPTEMBER 2023.	B210	0.10	35.00
08/25/23	DNR	CORRESPONDENCE WITH AHUJA & CLARK REGARDING ACCOUNT ANALYSIS.	B120	0.30	105.00
08/25/23	DNR	CORRESPONDENCE WITH CONTRACT OPERATOR REGARDING INSURANCE PREMIUM REFUND AND COVERAGE.	B210	0.20	70.00
08/25/23	DNR	CORRESPONDENCE WITH STRETTO REGARDING CLAIMS PORTAL SETUP.	B310	0.40	140.00
08/25/23	DNR	CORRESPONDENCE WITH CONTRACT OPERATOR REGARDING	B210	0.20	70.00



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DATE	ID	DESCRIPTION	TASK	HOURS	AMOUNT
		ENVIRONMENTAL NOTICE FROM RAILROAD COMMISSION.			
08/25/23	DNR	CORRESPONDENCE WITH COMPTROLLER REGARDING PRE-RECEIVERSHIP DIESEL FUEL TAX REPORTING ISSUE.	B210	0.20	70.00
08/25/23	DNR	CALL WITH DEBORAH D. WILLIAMSON AND AHUJA & CLARK REGARDING OUTSTANDING ACCOUNTING AND TAX ISSUES.	B240	1.00	350.00
08/25/23	DNR	CORRESPONDENCE WITH AHUJA & CLARK REGARDING DRAFT DISTRIBUTION PROCESS ANALYSIS AND REVIEW OF SAME.	B310	0.20	70.00
08/25/23	DNR	RECEIVE AND DOWNLOAD ACCOUNT ANALYSIS DOCUMENTS FROM AHUJA & CLARK.	B120	0.10	35.00
08/25/23	DNR	CORRESPONDENCE TO AHUJA & CLARK REGARDING PRE-RECEIVERSHIP DIESEL FUEL TAX REPORTS OUTSTANDING.	B240	0.10	35.00
08/25/23	DNR	CORRESPONDENCE WITH DEBORAH D. WILLIAMSON AND AHUJA & CLARK REGARDING INVESTOR TAX INQUIRY.	B240	0.40	140.00
08/25/23	DNR	CORRESPONDENCE FROM INVESTOR REGARDING TAX DOCUMENTATION.	B110	0.10	35.00
08/25/23	DNR	CALL WITH DEBORAH D. WILLIAMSON AND REID COLLINS REGARDING ADDITIONAL DOCUMENT REQUESTS OF OPPOSING COUNSEL.	BT160	0.70	245.00
08/25/23	DNR	CALL WITH DEBORAH D. WILLIAMSON REGARDING PRE-RECEIVERSHIP DOCUMENT PRODUCTION AND DOCUMENT REQUESTS OF OPPOSING COUNSEL.	BT160	0.50	175.00
08/25/23	DNR	RECEIVE AND REVIEW WITHDRAWAL NOTICES OF P-4S FROM BUYER COUNSEL TO RAILROAD COMMISSION; SEND TO COMPLIANCE TEAM.	B130	0.30	105.00
08/25/23	DNR	CORRESPONDENCE WITH AHUJA & CLARK REGARDING BANK ACCOUNT INVENTORY.	B120	0.10	35.00
08/28/23	DNR	REVIEW AND RESPOND TO INVESTOR INQUIRIES.	B110	0.40	140.00
08/28/23	DNR	RECEIVE AND REVIEW RANGER GAS STATEMENT FOR JULY 2023; SEND TO COMPLIANCE TEAM.	B210	0.20	70.00
08/28/23	DNR	CORRESPONDENCE WITH VCIKI PALMOUR CONSULTATION REGARDING ROYALTY OWNER INQUIRY ON PRE-RECEIVERSHIP AMOUNTS.	B210	0.20	70.00
08/28/23	DNR	CORRESPONDENCE WITH ROYALTY OWNER REGARDING INQUIRY FOR PRE-RECEIVERSHIP AMOUNTS AND PRIOR OPERATORS.	B110	0.40	140.00
08/28/23	DNR	TELEPHONE CONFERENCE WITH VENDOR REGARDING RECEIVER'S CHECK.	B210	0.10	35.00



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08/28/23	DNR	TELEPHONE CONFERENCE WITH CONTRACT OPERATOR REGARDING VENDOR PAYMENT.	B210	0.10	35.00
08/28/23	DNR	CORRESPONDENCE WITH SEC COUNSEL REGARDING PRE-RECEIVERSHIP DOCUMENT PRODUCTION.	B110	0.40	140.00
08/28/23	DNR	CALL WITH REID COLLINS AND AHUJA & CLARK REGARDING ACCOUNT ANALYSIS.	B120	0.80	280.00
08/28/23	DNR	CORRESPONDENCE WITH REID COLLINS REGARDING OPPOSING COUNSEL'S DOCUMENT REQUESTS.	BT160	0.40	140.00
08/28/23	DNR	DISCUSS WITH DEBORAH D. WILLIAMSON DOCUMENT REQUESTS OF OPPOSING COUNSEL.	BT160	0.20	70.00
08/28/23	DNR	DISCUSS WITH DEBORAH D. WILLIAMSON POTENTIAL RECOVERY ON REAL PROPERTY.	B120	0.10	35.00
08/28/23	DNR	CORRESPONDENCE TO STRETTO REGARDING CLAIMS PROCESS.	B310	0.10	35.00
08/28/23	DNR	CORRESPONDENCES FROM GENERAL LAND OFFICE REGARDING STATEMENTS OF ACCOUNT; SEND TO VCKI PALMOUR CONSULTING.	B210	0.20	70.00
08/29/23	DNR	CORRESPONDENCE TO DEBORAH D. WILLIAMSON REGARDING DATA HOSTING WIRE.	B210	0.10	35.00
08/29/23	DNR	CORRESPONDENCE WITH LANDOWNER REGARDING WELL LIST.	B110	0.30	105.00
08/29/23	DNR	CORRESPONDENCE WITH CONTRACT OPERATOR REGARDING WELL LIST REQUEST.	B210	0.40	140.00
08/29/23	DNR	REVIEW AND RESPOND TO INVESTOR INQUIRIES.	B110	0.40	140.00
08/29/23	TED	ADDRESS INVESTOR INQUIRIES.	B110	0.20	51.30
08/29/23	DNR	DISCUSS WITH DEBORAH D. WILLIAMSON DISPOSITION OF JEWELRY.	B130	0.20	70.00
08/29/23	DNR	TELEPHONE CONFERENCE WITH AUCTIONEER REGARDING ORDER AUTHORIZING SALE OF CERTAIN JEWELRY AND DETAILS NEEDED FOR UPCOMING PLACEMENT IN AUCTION.	B130	0.20	70.00
08/29/23	DNR	CORRESPONDENCE FROM GENERAL LAND OFFICE REGARDING OUTSTANDING PRODUCTION REPORT; SEND TO COMPLIANCE TEAM.	B210	0.20	70.00
08/29/23	DNR	DISCUSS WITH DEBORAH D. WILLIAMSON RECOVERABLE ASSETS.	B120	0.40	140.00
08/29/23	DNR	REVISE DEMAND LETTER TO MONROSE SAHOTA.	B120	0.50	175.00
08/30/23	DNR	REVIEW AND RESPOND TO INVESTOR INQUIRIES.	B110	1.00	350.00
08/30/23	DNR	RECEIVE AND REVIEW ORDER OF DISMISSAL OF CERTAIN GOOD	B130	0.30	105.00



DEBORAH D WILLIAMSON
DEBORAH WILLIAMSON

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DATE	ID	DESCRIPTION	TASK	HOURS	AMOUNT
		FAITH CLAIM DOCKETS FROM RAILROAD COMMISSION; SEND TO COMPLIANCE TEAM.			
08/30/23	DNR	CORRESPONDENCE WITH SEC COUNSEL REGARDING COMPLIANCE WITH PROVISIONS OF VARIOUS ORDER ISSUES BY NUMEROUS PARTIES.	B110	0.30	105.00
08/30/23	DNR	CORRESPONDENCE FROM INTERESTED PARTY REGARDING SUTTON COUNTY ASSETS.	B130	0.10	35.00
08/30/23	DNR	CORRESPONDENCE WITH COMPLIANCE TEAM REGARDING SUTTON COUNTY.	B130	0.50	175.00
08/30/23	DNR	REVIEW AND PROCESS RECEIVER'S MAIL.	B210	0.70	245.00
08/30/23	DNR	CORRESPONDENCE WITH COMPLIANCE TEAM REGARDING RAILROAD COMMISSION MAIL.	B210	0.30	105.00
08/30/23	DNR	DISCUSS CLAIMS PROCESS WITH DEBORAH D. WILLIAMSON.	B310	0.30	105.00
08/30/23	DNR	CORRESPONDENCE TO AHUJA & CLARK REGARDING CALIFORNIA FRANCHISE BOARD MAIL RECEIVED.	B240	0.10	35.00
08/30/23	DNR	CORRESPONDENCE WITH STRETTO REGARDING CLAIMS E-PORTAL.	B310	0.30	105.00
08/30/23	TED	ADDRESS INVESTOR INQUIRIES.	B110	0.20	51.30
08/30/23	DNR	DISCUSS WITH DEBORAH D. WILLIAMSON POTENTIAL CLAIMS AND CAUSES OF ACTION.	BT160	0.30	105.00
08/30/23	DNR	REVISE DRAFT INVESTOR AND OTHER CREDITOR NOTICES AND INSTRUCTIONS.	B310	1.00	350.00
08/30/23	DNR	TELEPHONE CONFERENCE WITH BROKER REGARDING ELDORADO INTEREST.	B130	0.20	70.00
08/30/23	DNR	TELEPHONE CONFERENCE WITH DEBORAH D. WILLIAMSON REGARDING ELDORADO UPDATE.	B130	0.10	35.00
08/31/23	TED	ADDRESS INVESTOR INQUIRIES.	B110	0.10	25.65
08/31/23	DNR	DISCUSS WITH DEBORAH D. WILLIAMSON CREDITOR AND INVESTOR CLAIM NOTICES AND PROPOSED DISPUTE RESOLUTION PROCESS.	B310	0.60	210.00
08/31/23	DNR	REVISE DRAFT NON-INVESTOR AND INVESTOR CLAIM NOTICES AND INSTRUCTIONS AND DRAFT PUBLICATION NOTICE.	B310	1.50	525.00
08/31/23	DNR	CORRESPONDENCE WITH CONTRACT OPERATOR REGARDING RAILROAD COMMISSION REINSPECTION.	B210	0.20	70.00
08/31/23	DNR	REVISE NON-INVESTOR AND INVESTOR PROOF OF CLAIM FORMS.	B310	1.30	455.00



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DATE	ID	DESCRIPTION	TASK	HOURS	AMOUNT
08/31/23	DNR	UPLOAD CLAIM CONTACT MATERIALS FOR STRETTO.	B310	0.20	70.00
08/31/23	DNR	CORRESPONDENCE WITH STRETTO REGARDING CLAIMANT CONTACT INFORMATION AND REVISED CLAIMS NOTICES AND FORMS.	B310	0.30	105.00
08/31/23	DNR	TELEPHONE CONFERENCE WITH ROYALTY OWNER REGARDING DIVISION ORDER PACKAGE AND QUESTIONS ON SAME.	B110	0.20	70.00
08/31/23	DNR	CORRESPONDENCE WITH AHUJA & CLARK REGARDING CLAIMS AND INVESTOR ANALYSIS AND PROPOSED FORMS.	B310	0.30	105.00
08/31/23	DNR	CORRESPONDENCE WITH STRETTO AND AHUJA & CLARK REGARDING CLAIMS CALL.	B310	0.10	35.00
08/31/23	DNR	CONTINUE DRAFTING CLAIMS MOTION AND PROPOSED ORDER OUTLINING CLAIMS PROCEDURE.	B310	2.70	945.00
TOTAL				125.90	\$44,045.05



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DEBORAH WILLIAMSON

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BILLING SUMMARY

ID	TIMEKEEPER	TITLE	HOURS	RATE	AMOUNT
TEG	TERESA GILTNER	PARTICIPATING MEMBER	1.90	526.50	1,000.35
DNR	DANIELLE R. BEHRENDIS	SENIOR ATTORNEY	120.20	350.00	42,070.00
TED	THERESA E. DICK	PARALEGAL	3.80	256.50	974.70
	TOTAL		125.90		\$44,045.05



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DEBORAH WILLIAMSON

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DISBURSEMENTS

DATE	DESCRIPTION	QUANTITY	RATE	AMOUNT
	PHOTOCOPIES	625.00	0.10	62.50
	PRINTING EXPENSES	2,400.00	0.10	240.20
	RELATIVITY DATA HOSTING	1.00	3,320.00	3,320.00
	SCANNING	221.00	0.10	22.10
	TOTAL DISBURSEMENTS			3,644.80



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DEBORAH WILLIAMSON

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TASK SUMMARY

TASK	TASK DESCRIPTION	HOURS	AMOUNT
B110	CASE ADMINISTRATION	15.20	4,964.70
B120	ASSET ANALYSIS AND RECOVERY	17.30	6,055.00
B130	ASSET DISPOSITION	24.40	8,875.35
B210	BUSINESS OPERATIONS	21.50	7,525.00
B240	TAX ISSUES	9.30	3,255.00
B310	CLAIMS ADMINISTRATION & OBJECT	17.30	6,055.00
BT160	LITIGATION CONSULTING	20.90	7,315.00
	TOTAL	125.90	44,045.05

EXPENSE SUMMARY

PHOTOCOPIES	62.50
SCANNING	22.10
PRINTING EXPENSES	240.20
RELATIVITY DATA HOSTING	3,320.00
TOTAL	3,644.80



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

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

DUE UPON RECEIPT

OCTOBER 30, 2023
MATTER #: 122686.000002
INVOICE #: 3550505

FOR PROFESSIONAL SERVICES RENDERED

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

FEES	\$	50,968.30
DISBURSEMENTS		3,671.10
INVOICE TOTAL	\$	54,639.40



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

DATE	ID	DESCRIPTION	TASK	HOURS	AMOUNT
09/01/23	DNR	CORRESPONDENCE WITH DEBORAH D. WILLIAMSON AND REID COLLINS REGARDING DOCUMENT REQUESTS OF OPPOSING COUNSEL.	BT160	0.30	105.00
09/01/23	DNR	CORRESPONDENCE WITH DEBORAH D. WILLIAMSON REGARDING INVESTOR INQUIRIES.	B110	0.20	70.00
09/01/23	DNR	CORRESPONDENCE WITH AHUJA & CLARK AND STRETTO REGARDING CLAIMS PROCESS.	B310	0.30	105.00
09/01/23	DNR	RECEIVE AND REVIEW ALL IBC ACCOUNT STATEMENTS FOR AUGUST 2023; SEND TO AHUJA & CLARK.	B210	0.30	105.00
09/05/23	DNR	REVIEW ORDER ACCEPTING AMENDED REPORT AND RECOMMENDATION REGARDING PIPELINE AND ABANDONMENT MOTIONS.	B130	0.10	35.00
09/05/23	DNR	SEND ORDER ACCEPTING AMENDED REPORT AND RECOMMENDATION REGARDING PIPELINE AND ABANDONMENT MOTIONS TO COMPLIANCE TEAM AND RECEIVE AVAILABILITY FOR CALL TO DISCUSS SAME.	B130	0.20	70.00
09/05/23	DNR	RECEIVE AND REVIEW WESTERN ALLIANCE BANK'S AUGUST 2023 STATEMENT; SEND TO AHUJA & CLARK.	B210	0.20	70.00
09/05/23	DNR	CORRESPONDENCE WITH SEC COUNSEL REGARDING CLAIMS PROCESS MOTION.	B310	0.30	105.00
09/05/23	DNR	CORRESPONDENCE WITH BROKER AND TERESA E. GILTNER REGARDING ELECTRA FEASIBILITY AND NEXT STEPS FOR SALE PROCESS.	B130	0.30	105.00
09/05/23	DNR	CALL WITH DEBORAH D. WILLIAMSON, AHUJA & CLARK, AND STRETTO REGARDING CLAIMS PACKAGES AND PROCESS PLANNING AND TIMELINE.	B310	1.30	455.00
09/05/23	DNR	CORRESPONDENCE WITH IBC BANK REGARDING INTERNATIONAL WIRE.	B210	0.20	70.00
09/05/23	DNR	CORRESPONDENCE WITH YAIR BARAHONA REGARDING WIRE FOR DATA HOSTING.	B210	0.20	70.00
09/05/23	DNR	TELEPHONE CONFERENCE WITH CONTRACT OPERATOR REGARDING VENDOR AND CONTACT INFORMATION LIST.	B210	0.10	35.00
09/05/23	DNR	COMPILE ADDITIONAL INFORMATION FOR STRETTO REGARDING POTENTIAL CREDITORS FOR MATRIX.	B310	0.30	105.00



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DATE	ID	DESCRIPTION	TASK	HOURS	AMOUNT
09/05/23	DNR	DISCUSS ORDER ACCEPTING AMENDED REPORT AND RECOMMENDATION AND NEXT STEPS FOR ORDERS ON PIPELINE AND ABANDONMENT MOTIONS WITH DEBORAH D. WILLIAMSON.	B130	0.40	140.00
09/05/23	DNR	CORRESPONDENCE WITH GULF COAST REGARDING PAYMENT REMITTANCE TERMS.	B210	0.30	105.00
09/05/23	DNR	CALL WITH DEBORAH D. WILLIAMSON AND AHUJA & CLARK REGARDING TAX AND ACCOUNTING OUTSTANDING ITEMS.	B240	0.50	175.00
09/05/23	DNR	CORRESPONDENCE WITH STRETTO REGARDING ADDITIONAL TRADE CREDITORS AND OUTSTANDING INFORMATION FOR CREDITOR MATRIX.	B310	0.30	105.00
09/05/23	DNR	CORRESPONDENCE TO FARMEE COUNSEL REGARDING OUTSTANDING AMOUNTS DUE TO GULF COAST.	B210	0.10	35.00
09/05/23	DNR	TELEPHONE CONFERENCE WITH ROYALTY OWNER REGARDING RE-ISSUANCE OF CHECK.	B110	0.10	35.00
09/05/23	DNR	CORRESPONDENCE TO AHUJA & CLARK REGARDING IRS MAIL RECEIVED.	B240	0.10	35.00
09/05/23	DNR	CORRESPONDENCE TO COMPLIANCE TEAM REGARDING RAILROAD COMMISSION MAIL RECEIVED.	B210	0.10	35.00
09/05/23	DNR	RECEIVE AND PROCESS RECEIVER'S MAIL.	B210	0.70	245.00
09/05/23	DNR	REPORT FOR COMPLIANCE CALL WITH TEAM.	B210	1.20	420.00
09/05/23	DNR	CALL WITH SEC COUNSEL REGARDING PROPOSED CLAIMS PROCESS.	B310	0.40	140.00
09/05/23	DNR	REVISE CLAIMS MOTION.	B310	1.00	350.00
09/05/23	DNR	CORRESPONDENCE WITH AHUJA & CLARK REGARDING DIESEL TAX REPORTS; REVIEW DRAFTS OF SAME.	B240	0.40	140.00
09/05/23	DNR	TELEPHONE CONFERENCE WITH COURTROOM DEPUTY REGARDING ORDER ON AMENDED REPORT AND RECOMMENDATION.	B110	0.10	35.00
09/05/23	DNR	CORRESPONDENCE WITH AHUJA & CLARK REGARDING INTUIT RECORDS REQUEST AND ITEMS ON SAME.	B120	0.20	70.00
09/05/23	TEG	TELEPHONE CONFERENCE WITH BRAZOS TITLE REGARDING STATUS OF TITLE COMMITMENT.	B130	0.20	105.30
09/05/23	DNR	CORRESPONDENCE WITH STRETTO REGARDING MATRIX FOR GOVERNMENTAL AGENCIES.	B310	0.20	70.00
09/06/23	DNR	CORRESPONDENCE WITH STRETTO REGARDING MAILING MATRIX.	B310	0.40	140.00



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DEBORAH WILLIAMSON

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DATE	ID	DESCRIPTION	TASK	HOURS	AMOUNT
09/06/23	DNR	RECEIVE UPDATE FROM BROKER REGARDING INTEREST IN ELDORADO RANCH.	B130	0.10	35.00
09/06/23	DNR	CORRESPONDENCE WITH CONTRACT OPERATOR REGARDING PRE-RECEIVERSHIP VENDOR INVOICES.	B210	0.20	70.00
09/06/23	DNR	TELEPHONE CONFERENCE WITH AHUJA & CLARK REGARDING DYED DIESEL TAX.	B240	0.10	35.00
09/06/23	DNR	RECEIVE AND PROCESS UTILITY PAYMENT FOR ELECTRA.	B210	0.20	70.00
09/06/23	DNR	RECEIVE AND REVIEW REVISED PLUGGING AND RESTORATION AGREEMENT.	B130	0.20	70.00
09/06/23	DNR	RECEIVE AND REVIEW UPDATED DYED DIESEL TAX REPORTS FOR 2020 AND 2021.	B240	0.20	70.00
09/06/23	DNR	PREPARE AND SEND DYED DIESEL TAX REPORTS AND PENALTY WAIVER FORMS PACKAGE TO COMPTROLLER.	B240	0.50	175.00
09/06/23	DNR	CORRESPONDENCE WITH AHUJA & CLARK REGARDING PENALTY WAIVER FORMS FOR COMPTROLLER.	B240	0.30	105.00
09/06/23	DNR	CORRESPONDENCE TO COMPTROLLER COUNSEL REGARDING PRE-RECEIVERSHIP REPORTS OUTSTANDING AND AMOUNTS DUE ON SAME.	B240	0.10	35.00
09/06/23	DNR	CORRESPONDENCE FROM REID COLLINS REGARDING OPPOSING COUNSEL'S DOCUMENT REQUESTS.	BT160	0.10	35.00
09/06/23	DNR	CORRESPONDENCE FROM COURTROOM DEPUTY REGARDING CREDENTIALS FOR SEPTEMBER 7, 2023 HEARING.	B110	0.10	35.00
09/06/23	DNR	CORRESPONDENCE WITH STRETTO REGARDING REVISED CLAIM FORMS AND NOTICES AND FURTHER EDITS ON SAME.	B310	0.40	140.00
09/06/23	DNR	CORRESPONDENCE TO IRS OFFICER REGARDING STATUS OF HEARING REQUEST ON NOTICE OF FILED FEDERAL TAX LIEN.	B240	0.10	35.00
09/06/23	DNR	TELEPHONE CONFERENCE WITH COURTROOM DEPUTY REGARDING UPCOMING COURT AVAILABILITY.	B110	0.20	70.00
09/06/23	DNR	TELEPHONE CONFERENCE WITH IRS OFFICER REGARDING TIMELY SUBMISSION OF COLLECTION DUE PROCESS HEARING MATERIALS.	B240	0.10	35.00
09/06/23	DNR	CORRESPONDENCE TO IRS APPEALS OFFICER REGARDING APPEALS OFFICER ASSIGNMENT AND REQUEST FOR HEARING ON FEDERAL TAX LIEN.	B240	0.10	35.00
09/06/23	DNR	CORRESPONDENCE WITH STRETTO REGARDING CLAIMS PROCEDURE TIMELINE AND ADMINISTRATIVE/PORTAL DEVELOPMENT ON SAME.	B310	0.40	140.00



DEBORAH D WILLIAMSON
DEBORAH WILLIAMSON

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DATE	ID	DESCRIPTION	TASK	HOURS	AMOUNT
09/06/23	DNR	CORRESPONDENCE WITH AHUJA & CLARK REGARDING BANK DOCUMENT REQUESTS.	B120	0.20	70.00
09/06/23	DNR	CORRESPONDENCE AND TELEPHONE CONFERENCE WITH VICKI PALMOUR CONSULTING REGARDING GENERAL LAND OFFICE PAYMENT DUE.	B210	0.20	70.00
09/06/23	DNR	REVISE CLAIMS PROCESS MOTION.	B310	1.00	350.00
09/06/23	DNR	PREPARE AND SEND PACKAGE TO GENERAL LAND OFFICE REGARDING ROYALTY PAYMENT OF BARRON PETROLEUM.	B210	0.20	70.00
09/06/23	DNR	TELEPHONE CONFERENCE WITH AHUJA & CLARK REGARDING INVESTMENT AND INVESTOR BREAKDOWN.	B310	0.30	105.00
09/06/23	DNR	FURTHER REVISE INVESTOR AND CREDITOR NOTICES AND PROOF OF CLAIM FORMS.	B310	0.80	280.00
09/06/23	DNR	DISCUSS CLAIMS PROCEDURE, PROPOSED TIMELINE, PROPOSED ORDER AND EXHIBITS, AND COURT AVAILABILITY WITH DEBORAH D. WILLIAMSON.	B310	0.70	245.00
09/06/23	DNR	CORRESPONDENCE WITH AHUJA & CLARK REGARDING PAYROLL RECORDS NEEDED FROM INTUIT.	B120	0.20	70.00
09/06/23	DNR	CORRESPONDENCE TO AHUJA & CLARK AND VICKI PALMOUR CONSULTING REGARDING W2/1099 TAX DOCUMENTS FOR 2020 AND 2021.	B210	0.10	35.00
09/07/23	TED	ADDRESS INVESTOR INQUIRIES.	B110	0.70	179.55
09/07/23	DNR	CORRESPONDENCE WITH FARMEE COUNSEL AND VICKI PALMOUR CONSULTING REGARDING GULF COAST INVOICES OUTSTANDING FOR VAL VERDE METERS.	B210	0.40	140.00
09/07/23	DNR	CORRESPONDENCE WITH DARRELL R. JONES REGARDING STATUS OF REIMBURSEMENT BY FARMEE FOR POST-EFFECTIVE DATE EXPENSES.	B210	0.30	105.00
09/07/23	DNR	TELEPHONE CONFERENCE WITH INVESTOR COUNSEL REGARDING STATUS OF CASE AND REQUEST FOR NOTICES.	B110	0.20	70.00
09/07/23	DNR	CORRESPONDENCE WITH STRETTO REGARDING ADDITIONS TO CREDITOR MATRIX FOR PRE-RECEIVERSHIP VENDORS, COUNSEL, AND LITIGATION.	B310	0.50	175.00
09/07/23	DNR	CORRESPONDENCE WITH AHUJA & CLARK REGARDING INVESTMENT ANALYSIS AND SAMPLE TRANSACTION SCHEDULE.	B120	0.70	245.00
09/07/23	DNR	CORRESPONDENCE WITH VICKI PALMOUR CONSULTING AND WOLFEPAK REGARDING WOLFEPAK SOFTWARE ACCESS ISSUES AND CUSTOMER FORMS.	B210	0.50	175.00



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DEBORAH WILLIAMSON

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DATE	ID	DESCRIPTION	TASK	HOURS	AMOUNT
09/07/23	DNR	CORRESPONDENCE WITH DEBORAH D. WILLIAMSON AND OIL AND GAS COUNSEL REGARDING PLUGGING AGREEMENT REVISIONS.	B130	0.30	105.00
09/07/23	DNR	TELEPHONE CONFERENCE WITH VICKI PALMOUR CONSULTING REGARDING WOLFEPAK REPORTS AND TAX DOCUMENTS.	B210	0.20	70.00
09/07/23	DNR	TELEPHONE CONFERENCE WITH VICKI PALMOUR CONSULTING REGARDING LEASE EXTENSION ISSUES AND GAS PURCHASE ITEMS FOR VAL VERDE.	B210	0.40	140.00
09/07/23	DNR	CORRESPONDENCE WITH OIL AND GAS COUNSEL REGARDING LEASE EXTENSION REQUEST OF FARMEE.	B210	0.40	140.00
09/07/23	DNR	TELEPHONE CONFERENCE WITH DEBORAH D. WILLIAMSON REGARDING WELL FILES.	B210	0.20	70.00
09/07/23	DNR	CORRESPONDENCE WITH COMPLIANCE TEAM REGARDING ALLEGED RAILROAD COMMISSION ENVIRONMENTAL VIOLATIONS.	B210	0.40	140.00
09/07/23	DNR	CORRESPONDENCE WITH COMPLIANCE TEAM REGARDING WELL FILES.	B210	0.40	140.00
09/07/23	DNR	CORRESPONDENCE WITH VICKI PALMOUR CONSULTING AND CONTRACT OPERATOR REGARDING REVENUE BILLING AND LEASE OPERATING STATEMENTS.	B210	0.20	70.00
09/07/23	DNR	REVISE DRAFT CLAIMS MOTION AND PROPOSED ORDER.	B310	1.00	350.00
09/07/23	DNR	RECEIVE AND REVIEW GAS STATEMENT FOR JULY 2023 FROM GULF COAST; SEND TO VICKI PALMOUR CONSULTING AND CONTRACT OPERATOR.	B210	0.20	70.00
09/07/23	DNR	APPEAR BEFORE THE HON. HAL R. RAY, JR. AT SEPTEMBER 7, 2023 HEARING.	B110	0.50	175.00
09/07/23	DNR	CORRESPONDENCE WITH DEBORAH D. WILLIAMSON REGARDING OPERATOR BONDS.	B210	0.20	70.00
09/07/23	DNR	REVISE AND FINALIZE INVESTOR AND CREDITOR NOTICES, PUBLICATION NOTICE, AND INVESTOR AND CREDITOR CLAIM FORMS.	B310	0.80	280.00
09/07/23	DNR	RECEIVE FROM AHUJA & CLARK AND REDACT SAMPLE TRANSACTION SCHEDULE.	B310	0.20	70.00
09/07/23	DNR	RECEIVE AND REVIEW SPREADSHEET FROM AHUJA & CLARK.	B120	0.30	105.00
09/07/23	DNR	TELEPHONE CONFERENCE WITH DEBORAH D. WILLIAMSON REGARDING CLAIMS PROCESS MOTION AND EXHIBITS.	B310	0.20	70.00
09/08/23	DNR	RESEARCH RECORDS AND CORRESPONDENCE WITH VICKI PALMOUR CONSULTING REGARDING WOLFEPAK INVOICES	B210	0.30	105.00



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DEBORAH WILLIAMSON

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DATE	ID	DESCRIPTION	TASK	HOURS	AMOUNT
		AND POST-RECEIVERSHIP PAYMENTS FOR SOFTWARE.			
09/08/23	DNR	CORRESPONDENCE WITH STRETTO, AHUJA & CLARK, AND DEBORAH D. WILLIAMSON REGARDING TRANSACTION SCHEDULE AND INFORMATION FOR INVESTOR CLAIM PACKAGES.	B310	0.30	105.00
09/08/23	DNR	REVISE FORMAT OF TRANSACTION SCHEDULE TEMPLATE.	B310	0.30	105.00
09/08/23	DNR	CORRESPONDENCE TO TITLE COMPANY REGARDING STATUS OF TITLE COMMITMENT AND CLOSING TIMELINE FOR ELECTRA.	B130	0.10	35.00
09/08/23	DNR	CORRESPONDENCE WITH SEC COUNSEL REGARDING CLAIMS MOTION AND ALL EXHIBITS FOR NOTICES AND CLAIM FORMS.	B310	0.30	105.00
09/08/23	DNR	CORRESPONDENCE WITH REID COLLINS REGARDING OPPOSING COUNSEL'S DOCUMENT REQUESTS.	BT160	0.60	210.00
09/08/23	DNR	REVIEW SEPTEMBER 8, 2023 COURT ORDER.	B110	0.10	35.00
09/08/23	TED	ADDRESS INVESTOR INQUIRIES.	B110	0.50	128.25
09/08/23	DNR	TELEPHONE CONFERENCE WITH AUCTIONEER REGARDING FIRST AUCTION PAYMENT ITEMS.	B130	0.30	105.00
09/08/23	DNR	TELEPHONE CONFERENCE WITH DEBORAH D. WILLIAMSON REGARDING FIRST AUCTION ISSUES.	B130	0.20	70.00
09/11/23	DNR	DISCUSS WITH DEBORAH D. WILLIAMSON AND PROCESS OUTSTANDING PAYMENTS DUE BY RECEIVER.	B110	0.40	140.00
09/11/23	DNR	CORRESPONDENCE WITH STRETTO REGARDING CLAIMS MOTION AND SERVICE INSTRUCTIONS FOR MATRIX.	B310	0.40	140.00
09/11/23	DNR	TELEPHONE CONFERENCE WITH COURTROOM DEPUTY REGARDING HEARING REQUEST ON CLAIMS MOTION.	B110	0.10	35.00
09/11/23	DNR	RESEARCH DOCUMENTS AND CORRESPONDENCE WITH STRETTO REGARDING ADDITIONS TO CREDITOR MATRIX.	B310	0.80	280.00
09/11/23	DNR	REVIEW AND RESPOND TO INVESTOR INQUIRIES.	B110	0.40	140.00
09/11/23	DNR	REVISE AND FINALIZE CLAIMS MOTION, COMPILE ALL EXHIBITS, AND FILE WITH THE COURT.	B310	0.80	280.00
09/11/23	DNR	DISCUSS WITH DEBORAH D. WILLIAMSON ADDITIONS TO CLAIMS PROCEDURE MOTION.	B310	0.50	175.00
09/11/23	DNR	TELEPHONE CONFERENCES WITH TERESA E. GILTNER REGARDING STATUS OF TITLE COMPANY RESPONSE FOR COMMITMENT.	B130	0.20	70.00
09/11/23	DNR	CORRESPONDENCE TO FARMEE COUNSEL REGARDING PAYMENT STATUS TO GULF COAST.	B210	0.10	35.00



DEBORAH D WILLIAMSON
DEBORAH WILLIAMSON

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DATE	ID	DESCRIPTION	TASK	HOURS	AMOUNT
09/11/23	DNR	CORRESPONDENCE WITH CONTRACT OPERATOR REGARDING VENDOR INVOICING ISSUES.	B210	0.30	105.00
09/11/23	DNR	RECEIVE AND PROCESS VENDOR INVOICE.	B210	0.20	70.00
09/11/23	DNR	CORRESPONDENCE WITH OIL AND GAS COUNSEL REGARDING PLUGGING AGREEMENT AND REQUESTED REVISIONS BY COUNTERPARTY.	B130	0.20	70.00
09/11/23	DNR	CORRESPONDENCE WITH GULF COAST REGARDING PAYMENT TO RECEIVER.	B210	0.20	70.00
09/11/23	DNR	CORRESPONDENCE WITH COMPLIANCE TEAM REGARDING PRODUCTION PAYMENTS.	B210	0.40	140.00
09/11/23	DNR	CORRESPONDENCE TO DEBORAH D. WILLIAMSON REGARDING IBC ACCOUNT ITEMS.	B210	0.10	35.00
09/11/23	DNR	REVISE DEMAND LETTER TO MONROSE SAHOTA.	B120	0.30	105.00
09/11/23	DNR	CORRESPONDENCE TO LOCAL COUNSEL REGARDING CLAIMS MOTION.	B310	0.10	35.00
09/11/23	DNR	CORRESPONDENCE WITH AHUJA & CLARK REGARDING AMENDED DRAFT RETURN FOR DALLAS RESOURCES.	B240	0.30	105.00
09/11/23	DNR	CORRESPONDENCE WITH TERESA E. GILTNER AND TITLE COMPANY REGARDING COMMITMENT AND CLOSING INFORMATION.	B130	0.30	105.00
09/12/23	DNR	REVIEW ORDER SETTING HEARING ON OCTOBER 10, 2023.	B110	0.10	35.00
09/12/23	DNR	REVIEW AND RESPOND TO INVESTOR INQUIRIES.	B110	0.60	210.00
09/12/23	DNR	TELEPHONE CONFERENCE WITH INVESTOR REGARDING CLAIMS PROCESS.	B110	0.20	70.00
09/12/23	DNR	REVIEW AMENDED ORDER SETTING HEARING ON OCTOBER 16, 2023.	B110	0.10	35.00
09/12/23	DNR	CORRESPONDENCE WITH STRETTO REGARDING CLAIMS MOTION AND ORDER PACKAGES AND ADDITIONS/REVISIONS TO CREDITOR MATRIX.	B310	1.00	350.00
09/12/23	DNR	PREPARE AND FILE NOTICE OF HEARING AND SERVICE OF COURT ORDER ON CLAIMS MOTION FOR OCTOBER 16, 2023.	B110	0.40	140.00
09/12/23	DNR	ANALYZE INVESTOR MATRIX AND RESEARCH INFORMATION FOR INVESTORS REQUESTED BY STRETTO.	B310	0.50	175.00
09/12/23	DNR	RECEIVE AND PROCESS RECEIVER'S MAIL.	B210	0.60	210.00
09/12/23	DNR	REISSUE ROYALTY PAYMENT TO ROYALTY OWNER DUE TO STALE CHECK.	B210	0.30	105.00



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DATE	ID	DESCRIPTION	TASK	HOURS	AMOUNT
09/12/23	DNR	CORRESPONDENCE WITH COMPLIANCE TEAM REGARDING ENERGINET ESCROW FUNDS.	B130	0.20	70.00
09/12/23	DNR	ANALYZE DOCUMENTS AND DRAFT DEMAND LETTER TO SUNNY AND MANDEEP SAHOTA REGARDING TURNOVER OF BAHAMAS PROPERTY AND FUNDS REGARDING SAME; COMPILE AND SEND SAME TO SUNNY AND MANDEEP SAHOTA AND SAHOTA BAHAMIAN COUNSEL.	B120	1.70	595.00
09/12/23	DNR	REVISE DEMAND LETTER TO MONROSE SAHOTA AND HIS COUNSEL REGARDING BAHAMAS PROPERTY; COMPILE AND SEND SAME.	B120	0.40	140.00
09/12/23	DNR	CALL WITH DEBORAH D. WILLIAMSON AND AHUJA & CLARK REGARDING DRAFT AMENDED RETURN OF DALLAS RESOURCES AND COMMENTS ON SAME.	B240	0.30	105.00
09/12/23	DNR	CORRESPONDENCE TO AHUJA & CLARK REGARDING AIRCRAFT TITLE REPORT.	B120	0.10	35.00
09/12/23	DNR	RECEIVE AND REVIEW GENERAL LAND OFFICE REPORT AND PROCESS PAYMENT REGARDING SAME.	B210	0.40	140.00
09/12/23	DNR	REVIEW AND PROVIDE COMMENTS TO DRAFT AMENDED RETURN OF DALLAS RESOURCES.	B240	0.20	70.00
09/12/23	TEG	BRIEF REVIEW OF COMMITMENT, BEGIN WORK ON REVISIONS TO DRAFT SPECIAL WARRANTY DEED.	B130	0.80	421.20
09/12/23	DNR	CORRESPOND TO SEC COUNSEL REGARDING DEMAND LETTERS FOR TURNOVER OF TITLE TO BAHAMAS REAL PROPERTIES.	B120	0.10	35.00
09/12/23	DNR	CORRESPONDENCE WITH FARMEE COUNSEL REGARDING PAYMENT TO GULF COAST.	B210	0.20	70.00
09/12/23	DNR	TELEPHONE CONFERENCES WITH DEBORAH D. WILLIAMSON REGARDING ORDER SETTING HEARING.	B110	0.20	70.00
09/12/23	DNR	CALL WITH DEBORAH D. WILLIAMSON AND AHUJA & CLARK REGARDING DRAFT AMENDED RETURN OF DALLAS RESOURCES AND COMMENTS ON SAME.	B240	0.30	105.00
09/12/23	DNR	REVIEW AND PROVIDE COMMENTS TO DRAFT AMENDED RETURN OF DALLAS RESOURCES.	B240	0.20	70.00
09/12/23	DNR	CORRESPONDENCE TO AHUJA & CLARK REGARDING AIRCRAFT TITLE REPORT.	B120	0.10	35.00
09/12/23	DNR	CORRESPONDENCE WITH FARMEE COUNSEL REGARDING PAYMENT TO GULF COAST.	B210	0.20	70.00
09/12/23	DNR	CORRESPONDENCE WITH OIL AND GAS COUNSEL AND DEBORAH D. WILLIAMSON REGARDING PLUGGING	B130	0.30	105.00



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DATE	ID	DESCRIPTION	TASK	HOURS	AMOUNT
		AGREEMENT REVISIONS.			
09/12/23	DNR	TELEPHONE CONFERENCE WITH COURTROOM DEPUTY REGARDING ORDER SETTING HEARING AND TIMELINE ISSUES.	B110	0.10	35.00
09/12/23	DNR	TELEPHONE CONFERENCES WITH DEBORAH D. WILLIAMSON REGARDING ORDER SETTING HEARING.	B110	0.20	70.00
09/13/23	TEG	CONTINUE WORKING ON CLOSING MATTERS.	B130	1.00	526.50
09/13/23	DNR	CORRESPONDENCE WITH STRETTO REGARDING CLAIMS NOTICING AND INFORMATION FOR SAME.	B310	0.70	245.00
09/13/23	DNR	CORRESPONDENCE WITH STRETTO REGARDING RETURN E-MAILS FOR CLAIMS PACKAGES.	B310	0.20	70.00
09/13/23	DNR	REVIEW DRAFT MATERIALS FROM STRETTO GOING OUT TO MATRIX REGARDING CLAIMS MOTION AND NOTICE OF HEARING.	B310	0.20	70.00
09/13/23	DNR	CORRESPONDENCE FROM SEC COUNSEL REGARDING DEMAND LETTERS FOR BAHAMAS REAL PROPERTIES.	B120	0.10	35.00
09/13/23	DNR	CORRESPONDENCE WITH WOLFEPAK AND VICKI PALMOUR CONSULTING REGARDING DATA MIGRATION FORM AND ISSUES ON ACCOUNT.	B210	0.30	105.00
09/13/23	DNR	TELEPHONE CONFERENCE WITH TERESA E. GILTNER REGARDING CLOSING ON ELECTRA PROPERTY AND TAX CERTIFICATE ITEMS REGARDING SAME.	B130	0.10	35.00
09/13/23	DNR	REVIEW DRAFT DEED FOR ELECTRA.	B130	0.20	70.00
09/13/23	DNR	CORRESPONDENCE WITH WICHITA CAD COUNSEL REGARDING CLOSING ON ELECTRA PROPERTY AND TAX CERTIFICATE ITEMS REGARDING SAME.	B130	0.10	35.00
09/13/23	DNR	CORRESPONDENCE WITH TITLE COMPANY REGARDING CLOSING TIMELINE AND DOCUMENTS FOR ELECTRA PROPERTY.	B130	0.30	105.00
09/13/23	DNR	CORRESPONDENCE TO REID COLLINS REGARDING POTENTIAL CAUSES OF ACTION.	BT160	0.10	35.00
09/13/23	DNR	TELEPHONE CONFERENCE WITH ROYALTY OWNER REGARDING STATUS OF NEXT PAYMENT.	B110	0.10	35.00
09/13/23	DNR	CORRESPONDENCE TO CONTRACT OPERATOR REGARDING REVENUE BILLING REVIEW.	B210	0.10	35.00
09/13/23	DNR	REVIEW AND RESPOND TO INVESTOR INQUIRIES.	B110	2.60	910.00
09/13/23	DNR	CORRESPONDENCE WITH AHUJA & CLARK REGARDING CLAIMS ANALYSIS AND ASSUMPTIONS.	B310	0.40	140.00



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DATE	ID	DESCRIPTION	TASK	HOURS	AMOUNT
09/13/23	DNR	RECEIVE AND PROCESS RECEIVER'S MAIL.	B210	0.50	175.00
09/13/23	DNR	CORRESPONDENCE TO COMPLIANCE TEAM REGARDING RAILROAD COMMISSION MAIL RECEIVED.	B210	0.10	35.00
09/14/23	DNR	CORRESPONDENCE WITH COMPLIANCE TEAM REGARDING RAILROAD COMMISSION NOTICE AND RESPONSE TO SAME FOR VARIOUS LOCATIONS.	B210	0.70	245.00
09/14/23	DNR	CORRESPONDENCE WITH STRETTO REGARDING CLAIMS INQUIRY RESPONSE PROTOCOL.	B310	0.20	70.00
09/14/23	DNR	RECEIVE AND REVIEW FULLY EXECUTED PLUGGING AGREEMENT.	B210	0.20	70.00
09/14/23	DNR	CORRESPONDENCE WITH STRETTO REGARDING CERTIFICATE OF SERVICE AND REDACTION FOR IDENTITY PROTECTION OF KNOWN INVESTORS.	B310	0.40	140.00
09/14/23	DNR	PREPARE AND SEND PACKAGE TO AHUJA & CLARK REGARDING AMENDED 2022 TAX RETURN DOCUMENTS FOR DALLAS RESOURCES.	B240	0.20	70.00
09/14/23	DNR	CORRESPONDENCE WITH AHUJA & CLARK REGARDING TAX RETURN DOCUMENTS AND PAYMENT INFORMATION TO IRS.	B240	0.30	105.00
09/14/23	DNR	REVIEW AND RESPOND TO INVESTOR INQUIRIES.	B110	1.70	595.00
09/14/23	DNR	CALL WITH DEBORAH D. WILLIAMSON AND AHUJA & CLARK REGARDING CLAIMS ANALYSIS METHODOLOGY.	B310	0.90	315.00
09/14/23	DNR	CORRESPONDENCE WITH STRETTO REGARDING ADDRESS UPDATES FOR INVESTORS AND NEW CLAIMS PACKAGES.	B310	0.60	210.00
09/14/23	DNR	TELEPHONE CONFERENCE WITH STRETTO REGARDING ADDITIONAL REDACTION ITEMS.	B310	0.10	35.00
09/14/23	DNR	TELEPHONE CONFERENCE WITH STRETTO REGARDING EXHIBITS TO CLAIMS PACKAGE CERTIFICATE OF SERVICE AND REVISIONS REQUIRED FOR SAME.	B310	0.40	140.00
09/14/23	DNR	TELEPHONE CONFERENCE WITH INVESTOR REGARDING CLAIMS MOTION.	B110	0.40	140.00
09/14/23	DNR	CALL WITH DEBORAH D. WILLIAMSON AND REID COLLINS REGARDING POTENTIAL CAUSES OF ACTION.	BT160	0.50	175.00
09/14/23	DNR	TELEPHONE CONFERENCE WITH INVESTOR REGARDING CLAIMS PROCEDURE MOTION AND PROPOSED TIMELINE.	B110	0.10	35.00
09/14/23	DNR	TELEPHONE CONFERENCE WITH OIL AND GAS VENDOR REGARDING CLAIMS MOTION AND PROPOSED TIMELINE.	B110	0.10	35.00
09/14/23	DNR	TELEPHONE CONFERENCE WITH NOTICE RECIPIENT	B110	0.10	35.00



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DATE	ID	DESCRIPTION	TASK	HOURS	AMOUNT
		REGARDING NO INVESTMENT AND REMOVAL FROM MATRIX.			
09/14/23	DNR	REVIEW AND PROCESS FOURTH AMENDED TOLLING AGREEMENT.	BT160	0.10	35.00
09/14/23	DNR	CORRESPONDENCE WITH REID COLLINS REGARDING EXTENDED TOLL AGREEMENT.	BT160	0.30	105.00
09/14/23	DNR	CORRESPONDENCE WITH AHUJA & CLARK REGARDING PENALTY AND INTEREST FORMS OF IRS.	B240	0.40	140.00
09/14/23	DNR	TELEPHONE CONFERENCE WITH INVESTOR REGARDING INVESTMENT INQUIRY AND CLAIMS MOTION.	B110	0.10	35.00
09/14/23	DNR	CORRESPONDENCE WITH IBC BANK REGARDING WIRES TO IRS.	B210	0.20	70.00
09/14/23	DNR	DISCUSS WITH DEBORAH D. WILLIAMSON TAX PAYMENTS AND WIRE FORMS.	B240	0.10	35.00
09/14/23	DNR	TELEPHONE CONFERENCE WITH INVESTOR'S DAUGHTER REGARDING PROPOSED CLAIMS PROCEDURE AND STATUS OF ASSET RECOVERY.	B110	0.20	70.00
09/15/23	DNR	RECEIVE AND REVIEW ACCOUNT ANALYSIS STATEMENT FROM IBC BANK; SEND TO AHUJA & CLARK.	B210	0.30	105.00
09/15/23	DNR	REVIEW LETTER FROM TAX AUTHORITY AND LETTER FROM BUYER'S COUNSEL REGARDING PRE-RECEIVERSHIP TAXES.	B130	0.20	70.00
09/15/23	DNR	CORRESPONDENCE FROM CONTRACT OPERATOR REGARDING REVENUE BILLING.	B210	0.10	35.00
09/15/23	DNR	RECEIVE AND RESPOND TO INVESTOR INQUIRIES.	B110	0.40	140.00
09/15/23	DNR	CORRESPONDENCE WITH COMPLIANCE TEAM REGARDING WELL FILES.	B210	0.60	210.00
09/15/23	DNR	CORRESPONDENCE WITH OIL AND GAS COUNSEL REGARDING ORDER ENTERED ON ABANDONMENT MOTION AND TIMELINE TO APPEAL.	B130	0.20	70.00
09/15/23	DNR	TELEPHONE CONFERENCE WITH IBC BANK REGARDING WIRES TO IRS.	B210	0.10	35.00
09/15/23	DNR	RECEIVE UPDATE FROM REID COLLINS REGARDING MEDIATION.	BT160	0.10	35.00
09/15/23	DNR	CORRESPONDENCE WITH DEBORAH D. WILLIAMSON AND OIL AND GAS COUNSEL REGARDING SCHLEICHER COUNTY TAXES AND SALE OF OIL AND GAS ASSETS.	B130	0.40	140.00
09/15/23	DNR	CORRESPONDENCE WITH STRETTO REGARDING INVESTOR ADDRESS UPDATE AND CLAIMS NOTICE PACKAGE.	B310	0.30	105.00



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09/15/23	DNR	CORRESPONDENCE WITH AHUJA & CLARK REGARDING IRS WIRES AND PAYMENT INFORMATION FOR TAX RETURN.	B240	0.40	140.00
09/15/23	DNR	CORRESPONDENCE TO AUCTIONEER REGARDING ADDITIONAL AUCTION OF PERSONAL PROPERTY.	B130	0.10	35.00
09/15/23	DNR	CORRESPONDENCE WITH AHUJA & CLARK REGARDING TAX DOCUMENTS AND AUTHORIZATION BY DEBORAH D. WILLIAMSON REGARDING SAME.	B240	0.20	70.00
09/15/23	DNR	RECEIVE AND REVIEW FULLY EXECUTED EXTENDED TOLLING AGREEMENT.	BT160	0.10	35.00
09/15/23	DNR	CORRESPONDENCE WITH OIL AND GAS COUNSEL AND VICKI PALMOUR CONSULTING REGARDING COMPLETION REPORTS AND PLUG ITEMS.	B130	0.30	105.00
09/15/23	DNR	TELEPHONE CONFERENCE WITH OIL AND GAS COUNSEL REGARDING DEMAND FROM OIL AND GAS ASSET PURCHASER'S COUNSEL.	B130	0.50	175.00
09/15/23	DNR	RECEIVE AND REVIEW PIPELINE PACKAGE FROM RAILROAD COMMISSION.	B210	0.30	105.00
09/15/23	DNR	RECEIVE AND PROCESS RECEIVER'S MAIL.	B210	0.40	140.00
09/15/23	DNR	CORRESPONDENCE WITH IBC BANK REGARDING WIRES TO IRS.	B210	0.30	105.00
09/15/23	DNR	SEND RAILROAD COMMISSION MAIL TO RECEIVER'S COMPLIANCE TEAM.	B210	0.10	35.00
09/18/23	DNR	CORRESPONDENCE FROM AUCTIONEER REGARDING UPCOMING PERSONAL PROPERTY AUCTION.	B130	0.10	35.00
09/18/23	DNR	REPORT FOR COMPLIANCE CALL WITH TEAM.	B210	1.30	455.00
09/18/23	DNR	CORRESPONDENCE WITH STRETTO REGARDING CREDITOR MATRIX ADDITIONS AND MAILING OF CLAIMS MOTION PACKAGES.	B310	0.60	210.00
09/18/23	DNR	DISCUSS TIEP INVESTMENT ANALYSIS WITH DEBORAH D. WILLIAMSON AND PATRICK L. HUFFSTICKLER.	B120	1.00	350.00
09/18/23	DNR	RECEIVE AND TO INVESTOR INQUIRIES.	B110	1.60	560.00
09/18/23	DNR	TELEPHONE CONFERENCE WITH INVESTOR REGARDING QUESTION ON CLAIMS MOTION.	B110	0.20	70.00
09/18/23	DNR	TELEPHONE CONFERENCE WITH FORMER EMPLOYEE REGARDING CLAIMS MOTION QUESTION.	B110	0.10	35.00
09/18/23	DNR	REVIEW RESPONSE TO DEMAND OF BUYER.	B130	0.10	35.00
09/18/23	DNR	REVIEW INFORMATION REGARDING P-5 RENEWALS.	B210	0.10	35.00



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09/18/23	DNR	CORRESPONDENCE WITH STRETTO REGARDING INQUIRY FROM CLAIMS WEBSITE.	B310	0.30	105.00
09/18/23	DNR	TELEPHONE CONFERENCE WITH VENDOR REGARDING CLAIMS MOTION.	B110	0.10	35.00
09/18/23	DNR	TELEPHONE CONFERENCE WITH INVESTOR REGARDING INVESTMENT AND CLAIMS QUESTIONS.	B110	0.10	35.00
09/18/23	DNR	CORRESPONDENCE FROM COURTROOM DEPUTY REGARDING OCTOBER 16, 2023 HEARING CREDENTIALS.	B110	0.10	35.00
09/18/23	DNR	PROCESS VENDOR PAYMENTS.	B210	0.30	105.00
09/18/23	DNR	CORRESPONDENCE WITH AHUJA & CLARK REGARDING INVESTOR-SPECIFIC ANALYSIS.	B120	0.20	70.00
09/18/23	DNR	CORRESPONDENCE WITH AHUJA & CLARK REGARDING ADVISOR AND INVESTMENT QUESTIONS.	B310	0.20	70.00
09/18/23	DNR	CORRESPONDENCE WITH TERESA E. GILTNER REGARDING ELECTRA CLOSING TIMELINE.	B130	0.20	70.00
09/18/23	DNR	CORRESPONDENCE WITH VICKI PALMOUR CONSULTING REGARDING LEASE AND ROYALTY OWNER REPORTS.	B210	0.20	70.00
09/18/23	DNR	TELEPHONE CONFERENCE WITH INVESTOR REGARDING CLAIMS PROCEDURE QUESTIONS AND TIMELINE.	B110	0.20	70.00
09/18/23	DNR	TELEPHONE CONFERENCE WITH FORMER EMPLOYEE REGARDING CLAIMS MOTION.	B110	0.10	35.00
09/18/23	DNR	CORRESPONDENCE WITH VICKI PALMOUR CONSULTING REGARDING DELIVERY OF WELL FILES.	B210	0.20	70.00
09/18/23	DNR	DISCUSS WITH DEBORAH D. WILLIAMSON INVESTOR INQUIRIES.	B110	0.30	105.00
09/18/23	DNR	CORRESPOND TO TITLE COMPANY REGARDING CLOSING TIMELINE FOR ELECTRA.	B130	0.10	35.00
09/18/23	PLH	OFFICE CONFERENCE MS. WILLIAMSON AND MS. BEHREND ON POTENTIAL CLAIMS AGAINST "TIEP INVESTORS" AND STRATEGY TO PURSUE CLAIMS.	B120	0.70	381.15
09/18/23	PLH	REVIEW INFORMATION AND DOCUMENTS RELATED TO POTENTIAL CLAIMS AGAINST "TIEP INVESTORS."	B120	0.80	435.60
09/18/23	PLH	FURTHER OFFICE CONFERENCE MS. WILLIAMSON REGARDING STRATEGY TO ADDRESS POTENTIAL CLAIMS AGAINST TIEP INVESTORS.	B120	0.30	163.35
09/18/23	PLH	OFFICE CONFERENCE MS. BEHREND REGARDING FACTS AND ACCOUNTING ANALYSIS WITH RESPECT TO POTENTIAL CLAIMS	B120	0.60	326.70



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		AGAINST TIEP INVESTORS AND REVIEW MS. BEHREND'S E-MAIL ON SAME.			
09/19/23	DNR	CORRESPONDENCE WITH OIL AND GAS COUNSEL REGARDING NOTICE OF ABANDONMENT.	B130	0.40	140.00
09/19/23	DNR	CORRESPONDENCE WITH OIL AND GAS COUNSEL AND VICKI PALMOUR CONSULTING REGARDING PLUGGING AGREEMENT AND DOCUMENTATION REGARDING SAME.	B130	0.30	105.00
09/19/23	DNR	RECEIVE AND REVIEW INVESTOR-SPECIFIC ANALYSIS; CORRESPONDENCE WITH AHUJA & CLARK REGARDING SAME.	B120	0.30	105.00
09/19/23	DNR	CORRESPONDENCE WITH OIL AND GAS COUNSEL REGARDING BUYER'S COUNSEL RESPONSE.	B130	0.20	70.00
09/19/23	DNR	REPORT FOR TAX AND ACCOUNTING CALL WITH AHUJA & CLARK.	B240	0.50	175.00
09/19/23	DNR	REVIEW DRAFT CERTIFICATE OF SERVICE EXHIBITS AND REDACTION ITEMS FOR SAME.	B310	0.30	105.00
09/19/23	DNR	CORRESPONDENCE WITH STRETTO REGARDING REDACTED EXHIBITS AND CLAIMS PACKAGE SERVICE.	B310	0.10	35.00
09/19/23	DNR	REVIEW SPREADSHEET REGARDING INVESTMENT ANALYSIS FROM AHUJA & CLARK.	B120	0.20	70.00
09/19/23	DNR	CORRESPONDENCE WITH AHUJA & CLARK REGARDING DRAFT MASTER INVESTOR SCHEDULE; REVIEW SAME.	B310	0.40	140.00
09/19/23	DNR	CORRESPONDENCE WITH VICKI PALMOUR CONSULTING REGARDING DISTRIBUTION REPORTS AND QUESTIONS ON SAME.	B210	0.30	105.00
09/19/23	DNR	REVIEW AND RESPOND TO INVESTOR INQUIRIES.	B110	0.60	210.00
09/19/23	DNR	TELEPHONE CONFERENCE WITH TERESA E. GILTNER REGARDING ELECTRA CLOSING ITEMS.	B130	0.20	70.00
09/19/23	DNR	CORRESPONDENCE WITH BROKER REGARDING CLOSING TIMELINE AND BUYER'S OUTSTANDING ITEMS; UPDATE DEBORAH D. WILLIAMSON REGARDING SAME.	B130	0.40	140.00
09/19/23	DNR	CORRESPONDENCE WITH DEBORAH D. WILLIAMSON AND AHUJA & CLARK REGARDING INVESTMENT ANALYSIS.	B120	0.20	70.00
09/19/23	PLH	REVIEW ACCOUNTING CHARTS REFLECTING TIEP INVESTOR PAYMENTS TO ADDRESS ASSERTING DEMANDS AGAINST SUCH TIEP INVESTORS AND REVIEW CURRENT DRAFT OF DEMAND LETTER.	B120	0.60	326.70
09/19/23	TEG	CONTINUE WORK ON OUTSTANDING CLOSING MATTERS.	B130	1.00	526.50



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09/20/23	PLH	REVIEW ADDITIONAL DOCUMENTS COMPILED BY ACCOUNTANTS ON TIEP INVESTOR PAYMENTS AND UNDERLYING TIEP INVESTOR DOCUMENTS.	B120	1.20	653.40
09/20/23	DNR	CORRESPONDENCE WITH AHUJA & CLARK REGARDING DECLARATION IN SUPPORT OF CLAIMS MOTION.	B310	0.20	70.00
09/20/23	DNR	RECEIVE, REVIEW, AND FILE FINALIZED CLAIMS MOTION AND ORDER SETTING HEARING SERVICE CERTIFICATE FROM STRETTO.	B310	0.30	105.00
09/20/23	DNR	CORRESPONDENCE WITH AHUJA & CLARK REGARDING WIRES TO IRS.	B240	0.30	105.00
09/20/23	DNR	CORRESPONDENCE WITH IBC BANK REGARDING WIRES REQUESTED BY RECEIVER.	B210	0.30	105.00
09/20/23	DNR	CORRESPONDENCE WITH VICKI PALMOUR CONSULTING REGARDING ROYALTY SUSPENSE ISSUES.	B210	0.30	105.00
09/20/23	DNR	PROCESS AND SEND ROYALTY DISTRIBUTION PACKAGES FOR BARRON.	B210	1.30	455.00
09/20/23	DNR	TELEPHONE CONFERENCE WITH INVESTOR REGARDING QUESTIONS ON CLAIMS MOTION.	B110	0.10	35.00
09/20/23	DNR	TELEPHONE CONFERENCE WITH INVESTOR REGARDING CASE STATUS AND CLAIMS MOTION.	B110	0.20	70.00
09/20/23	DNR	TELEPHONE CONFERENCE WITH INVESTOR REGARDING CLAIMS MOTION QUESTIONS AND TIMELINE FOR PAYMENT.	B110	0.20	70.00
09/20/23	DNR	CALL WITH AHUJA & CLARK REGARDING INVESTMENT ANALYSIS FOR CLAIMS PROCESS.	B310	0.90	315.00
09/20/23	DNR	TELEPHONE CONFERENCE WITH VICKI PALMOUR CONSULTING REGARDING REVENUE BILLING AND OUTSTANDING OBLIGATIONS.	B210	0.80	280.00
09/20/23	DNR	RECEIVE AND PROCESS UTILITY BILL.	B210	0.20	70.00
09/20/23	DNR	RECEIVE AND PROCESS RECEIVER'S MAIL.	B210	0.30	105.00
09/20/23	DNR	CORRESPONDENCE TO COMPLIANCE TEAM REGARDING RAILROAD COMMISSION MAIL.	B210	0.10	35.00
09/20/23	DNR	DISCUSS WITH DEBORAH D. WILLIAMSON ROYALTY DISTRIBUTION AND WIRES.	B210	0.20	70.00
09/20/23	DNR	TELEPHONE CONFERENCE WITH INVESTOR REGARDING QUESTION ON CLAIMS MOTION.	B110	0.10	35.00
09/20/23	DNR	TELEPHONE CONFERENCE WITH INVESTOR REGARDING UPDATING CONTACT INFORMATION AND REQUESTING CLAIMS	B110	0.10	35.00



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		PACKAGE.			
09/20/23	DNR	REVIEW AND RESPOND TO INVESTOR INQUIRIES.	B110	0.50	175.00
09/20/23	DNR	TELEPHONE CONFERENCE WITH INVESTOR REGARDING CLAIMS MOTION.	B110	0.10	35.00
09/20/23	DNR	CORRESPONDENCE WITH STRETTO REGARDING CREDITOR MATRIX AND EDITS TO SAME.	B310	0.30	105.00
09/20/23	DNR	DISCUSS CLAIMS PROCESS WITH DEBORAH D. WILLIAMSON.	B310	0.30	105.00
09/20/23	DNR	TELEPHONE CONFERENCE WITH PURPORTED INVESTOR REGARDING QUESTIONS ON MAILINGS AND BACKGROUND ON CASE.	B110	0.10	35.00
09/20/23	DNR	TELEPHONE CONFERENCE WITH VENDOR REGARDING CLAIMS MOTION.	B110	0.20	70.00
09/20/23	DNR	CORRESPONDENCE FROM VENDOR REGARDING REMOVAL FROM CREDITOR MATRIX.	B110	0.10	35.00
09/20/23	DNR	RECEIVE AND REVIEW UPDATE FROM FARMEE.	B130	0.20	70.00
09/21/23	DNR	TELEPHONE CONFERENCE WITH INVESTOR REGARDING QUESTIONS ON CLAIMS MOTION.	B110	0.10	35.00
09/21/23	DNR	TELEPHONE CONFERENCE WITH VENDOR REGARDING QUESTIONS ON CLAIMS PACKAGE.	B110	0.10	35.00
09/21/23	DNR	CORRESPONDENCE WITH CONTRACT OPERATOR REGARDING ELECTRA PROPERTY.	B130	0.30	105.00
09/21/23	DNR	REVIEW AND RESPOND TO INVESTOR INQUIRIES.	B110	0.70	245.00
09/21/23	DNR	CORRESPONDENCE WITH TITLE COMPANY AND TERESA E. GILTNER REGARDING CLOSING DOCUMENTS AND TIMELINE FOR ELECTRA.	B130	0.40	140.00
09/21/23	DNR	CORRESPONDENCE WITH STRETTO REGARDING CREDITOR MATRIX UPDATES.	B310	0.40	140.00
09/21/23	DNR	CORRESPONDENCE WITH INVESTOR'S SON REGARDING POWER OF ATTORNEY DOCUMENTS.	B110	0.20	70.00
09/21/23	DNR	CORRESPONDENCE WITH VENDOR REGARDING CLAIMS MOTION AND CONTACT INFORMATION.	B110	0.30	105.00
09/21/23	DNR	CORRESPONDENCE WITH TERESA E. GILTNER REGARDING CLOSING TIMELINE AND DOCUMENTS OUTSTANDING FOR ELECTRA.	B130	0.20	70.00
09/21/23	DNR	TELEPHONE CONFERENCE WITH INVESTOR REGARDING QUESTIONS ON CLAIMS MOTION AND INVESTMENTS.	B110	0.20	70.00



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DATE	ID	DESCRIPTION	TASK	HOURS	AMOUNT
09/21/23	DNR	TELEPHONE CONFERENCE WITH INVESTOR REGARDING CLAIMS PROCESS.	B110	0.10	35.00
09/21/23	DNR	TELEPHONE CONFERENCE WITH IBC BANK REGARDING WIRE CONFIRMATION.	B210	0.10	35.00
09/21/23	DNR	TELEPHONE CONFERENCE WITH FORMER EMPLOYEE OF BARRON REGARDING CLAIMS MOTION.	B110	0.10	35.00
09/21/23	DNR	CORRESPONDENCE FROM OIL AND GAS COUNSEL REGARDING PIPELINE LEAK.	B210	0.10	35.00
09/21/23	DNR	TELEPHONE CONFERENCE WITH INVESTOR REGARDING CLAIMS PROCESS AND TIMELINE.	B110	0.40	140.00
09/21/23	DNR	CORRESPONDENCE WITH AHUJA & CLARK REGARDING INVESTOR-SPECIFIC INVESTMENT INQUIRIES.	B120	0.70	245.00
09/21/23	DNR	TELEPHONE CONFERENCE WITH INVESTOR REGARDING CLAIMS PROCESS AND INVESTMENT QUESTIONS.	B110	0.20	70.00
09/21/23	DNR	TELEPHONE CONFERENCE WITH OIL AND GAS COUNSEL REGARDING PIPELINE LEAK.	B210	0.10	35.00
09/21/23	DNR	RECEIVE UPDATE FROM CONTRACT OPERATOR REGARDING PIPELINE LEAK AND REMEDY FOR SAME.	B210	0.20	70.00
09/21/23	DNR	CORRESPONDENCE WITH AHUJA & CLARK REGARDING AMENDED TAX RETURN OF DALLAS RESOURCES; DOWNLOAD MATERIALS REGARDING SAME.	B240	0.30	105.00
09/21/23	DNR	TELEPHONE CONFERENCE WITH INVESTOR REGARDING CASE STATUS.	B110	0.10	35.00
09/21/23	DNR	TELEPHONE CONFERENCE WITH VICKI PALMOUR CONSULTING REGARDING SUSPENSE LIST ISSUES.	B210	0.40	140.00
09/21/23	DNR	TELEPHONE CONFERENCE WITH DEBORAH D. WILLIAMSON REGARDING CREDITOR MATRIX QUESTIONS.	B310	0.20	70.00
09/21/23	DNR	CORRESPONDENCE TO IBC BANK REGARDING CHECKS.	B210	0.10	35.00
09/21/23	DNR	CORRESPONDENCE WITH VICKI PALMOUR CONSULTING REGARDING ROYALTY REPORTS.	B210	0.20	70.00
09/22/23	DNR	CORRESPONDENCE FROM IBC BANK REGARDING CHECKS.	B210	0.10	35.00
09/22/23	DNR	REVIEW AND RESPOND TO INVESTOR INQUIRIES.	B110	1.20	420.00
09/22/23	DNR	CORRESPONDENCE WITH STRETTO REGARDING CREDITOR MATRIX UPDATES AND CLAIMS PACKAGES.	B310	0.40	140.00
09/22/23	DNR	CORRESPONDENCE WITH DEBORAH D. WILLIAMSON REGARDING FINAL ROYALTY PAYMENTS.	B210	0.30	105.00



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09/22/23	DNR	CORRESPONDENCE WITH CONTRACT OPERATOR REGARDING AUGUST 2023 INVOICE.	B210	0.20	70.00
09/22/23	DNR	DRAFT FINAL ROYALTY PAYMENT TEMPLATE LETTER FOR ALL OPERATORS.	B210	0.40	140.00
09/22/23	DNR	RECEIVE AND REVIEW RECEIVER'S MAIL.	B210	0.20	70.00
09/22/23	DNR	ANALYZE PRE-RECEIVERSHIP AND CURRENT ROYALTY OWNER DOCUMENTS FOR PANTHER CITY.	B210	2.00	700.00
09/25/23	DNR	REPORT FOR COMPLIANCE CALL WITH TEAM.	B210	0.50	175.00
09/25/23	DNR	REVIEW AND RESPOND TO INVESTOR INQUIRIES.	B110	1.50	525.00
09/25/23	DNR	PROCESS VENDOR INVOICE AND DISCUSS WITH DEBORAH D. WILLIAMSON.	B210	0.20	70.00
09/25/23	DNR	CORRESPONDENCE WITH AHUJA & CLARK REGARDING INVESTOR-SPECIFIC CLAIM QUESTION.	B310	0.30	105.00
09/25/23	DNR	TELEPHONE CONFERENCE WITH INVESTOR REGARDING CLAIMS MOTION.	B110	0.20	70.00
09/25/23	DNR	TELEPHONE CONFERENCE WITH ROYALTY OWNER REGARDING DIVISION ORDER.	B110	0.10	35.00
09/25/23	DNR	CORRESPONDENCE WITH BROKER REGARDING CLOSING DOCUMENTS AND ITEMS OUTSTANDING FOR ELECTRA.	B130	0.30	105.00
09/25/23	DNR	RECEIVE AND REVIEW LISTS OF REMAINING WELLS.	B210	0.20	70.00
09/25/23	DNR	TELEPHONE CONFERENCE WITH INVESTOR REGARDING CLAIMS MOTION QUESTIONS.	B110	0.10	35.00
09/25/23	DNR	TELEPHONE CONFERENCE WITH BROKER REGARDING CLOSING ITEMS FOR ELECTRA.	B130	0.10	35.00
09/25/23	DNR	CORRESPONDENCE WITH TERESA E. GILTNER AND TITLE COMPANY REGARDING CLOSING DOCUMENTS FOR ELECTRA.	B130	0.60	210.00
09/25/23	DNR	CALL WITH AHUJA & CLARK AND STRETTO REGARDING INVESTOR MATRIX AND SPREADSHEET AS PART OF CUSTOMIZED TRANSACTION SCHEDULE.	B310	1.00	350.00
09/25/23	DNR	CORRESPONDENCE WITH STRETTO REGARDING MATRIX UPDATES AND CLAIMS PACKAGES.	B310	0.40	140.00
09/25/23	DNR	CORRESPONDENCE WITH GULF COAST REGARDING GAS STATEMENTS.	B210	0.20	70.00
09/25/23	DNR	TELEPHONE CONFERENCE WITH INVESTOR REGARDING CLAIMS MOTION QUESTIONS.	B110	0.20	70.00
09/25/23	DNR	CORRESPONDENCE WITH OIL AND GAS COUNSEL REGARDING	B130	0.20	70.00



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DATE	ID	DESCRIPTION	TASK	HOURS	AMOUNT
		ABANDONMENT NOTICE AND OUTSTANDING ITEMS FOR SAME.			
09/25/23	DNR	RECEIVE AND REVIEW GAS STATEMENT FROM GULF COAST; SEND TO COMPLIANCE TEAM.	B210	0.20	70.00
09/25/23	DNR	CORRESPONDENCE TO SDMB COUNSEL REGARDING GULF COAST INVOICE.	B210	0.10	35.00
09/25/23	DNR	TELEPHONE CONFERENCE WITH SOCIAL SECURITY ADMINISTRATION REGARDING RESPONSE TO NOTICES RECEIVED FOR AOS AND VENTURES.	B240	0.30	105.00
09/25/23	DNR	TELEPHONE CONFERENCE WITH VAL VERDE COUNTY SHERIFF'S OFFICE REGARDING CASE NOTICES RECEIVED.	B110	0.20	70.00
09/25/23	DNR	DISCUSS WITH DEBORAH D. WILLIAMSON CERTAIN TRANSACTION SCHEDULE ISSUES; CORRESPONDENCE WITH AHUJA & CLARK AND STRETTO RESOLVING SAME.	B310	0.30	105.00
09/25/23	DNR	TELEPHONE CONFERENCES WITH TERESA E. GILTNER REGARDING CLOSING DOCUMENTS AND NEXT STEPS FOR ELECTRA.	B130	0.20	70.00
09/25/23	DNR	RECEIVE AND PROCESS RECEIVER'S MAIL.	B210	0.40	140.00
09/25/23	DNR	TELEPHONE CONFERENCE WITH INVESTOR'S SON REGARDING QUESTIONS ON CLAIMS MOTION AND MOTHER'S INVESTMENT.	B110	0.10	35.00
09/25/23	DNR	CORRESPONDENCE TO VARIOUS RETAINED PERSONNEL REGARDING QUARTERLY REPORT FOR 3Q2023.	BT155	0.10	35.00
09/25/23	DNR	PREPARE LETTER TO TITLE COMPANY REGARDING SELLER DOCUMENTATION FOR ELECTRA.	B130	0.20	70.00
09/25/23	DNR	CORRESPONDENCE WITH AHUJA & CLARK REGARDING INVESTOR SCHEDULE QUESTIONS.	B310	0.30	105.00
09/25/23	DNR	DISCUSS AND PROCESS SALE DOCUMENTS WITH DEBORAH D. WILLIAMSON ELECTRA.	B110	0.20	70.00
09/25/23	TEG	CONTINUE WORK ON ELECTRA CLOSING MATTERS.	B130	1.00	526.50
09/25/23	TED	ADDRESS INVESTOR INQUIRIES.	B110	0.20	51.30
09/26/23	TEG	CONTINUE WORK ON CLOSING MATTERS.	B130	0.50	263.25
09/26/23	DNR	CORRESPONDENCE TO AHUJA & CLARK REGARDING COMPTROLLER LETTER RECEIVED.	B240	0.10	35.00
09/26/23	DNR	RECEIVE AND REVIEW REVISED INVOICE AND GAS STATEMENT FROM GULF COAST; SEND TO COMPLIANCE TEAM.	B210	0.30	105.00



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09/26/23	DNR	CORRESPONDENCE TO FARMEE COUNSEL REGARDING REVISED GAS STATEMENT RECEIVED FROM GULF COAST.	B210	0.10	35.00
09/26/23	DNR	RECEIVE AND RESPOND TO INVESTOR INQUIRIES.	B110	1.10	385.00
09/26/23	DNR	TELEPHONE CONFERENCE WITH TERESA E. GILTNER REGARDING CLOSING ITEMS AND DISCONNECTION.	B130	0.10	35.00
09/26/23	DNR	CORRESPONDENCE WITH BROKER REGARDING ELECTRA PROPERTY INSPECTION.	B130	0.10	35.00
09/26/23	DNR	TELEPHONE CONFERENCE WITH INVESTOR REGARDING QUESTIONS ON CLAIMS MOTION.	B110	0.10	35.00
09/26/23	DNR	CORRESPONDENCE WITH STRETTO REGARDING CREDITOR CLAIM SUBMITTED.	B310	0.30	105.00
09/26/23	DNR	TELEPHONE CONFERENCE WITH CITY OF ELECTRA REGARDING DISCONNECTION OF WATER.	B130	0.10	35.00
09/26/23	DNR	TELEPHONE CONFERENCE WITH TXU ENERGY REGARDING DISCONNECTION OF UTILITIES AT ELECTRA.	B130	0.20	70.00
09/26/23	DNR	RECEIVE AND REVIEW RANGER GAS STATEMENT FOR AUGUST 2023; SEND TO COMPLIANCE TEAM.	B210	0.20	70.00
09/26/23	DNR	TELEPHONE CONFERENCE WITH FORMER EMPLOYEE REGARDING CLAIMS MOTION QUESTIONS.	B110	0.10	35.00
09/26/23	DNR	CORRESPONDENCE WITH COMPLIANCE TEAM REGARDING SIGNS.	B210	0.40	140.00
09/26/23	DNR	REVISE DRAFT NOTICE OF ABANDONMENT OF CERTAIN OIL AND GAS PROPERTIES.	B130	1.20	420.00
09/26/23	DNR	CORRESPONDENCE WITH OIL AND GAS COUNSEL REGARDING DRAFT NOTICE OF ABANDONMENT.	B130	0.40	140.00
09/26/23	DNR	CORRESPONDENCE WITH AHUJA & CLARK AND STRETTO REGARDING TRANSACTION SCHEDULE DETAILS.	B310	0.20	70.00
09/26/23	DNR	TELEPHONE CONFERENCE WITH INVESTOR REGARDING CLAIMS MOTION PACKAGE.	B110	0.10	35.00
09/26/23	DNR	CORRESPONDENCE WITH STRETTO REGARDING STATUS OF INVESTOR CLAIMS PACKAGE AT NEW ADDRESS.	B310	0.20	70.00
09/26/23	DNR	TELEPHONE CONFERENCE WITH INVESTOR REGARDING QUESTIONS ON CLAIMS PROCESS.	B110	0.20	70.00
09/26/23	DNR	ANALYZE SUSPENSE REPORTS FOR PANTHER CITY ENERGY AND BARRON PETROLEUM AND ADVISE ON NEXT STEPS FOR FINAL DISTRIBUTION.	B210	0.60	210.00



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09/26/23	DNR	CORRESPONDENCE TO TITLE COMPANY REGARDING CLOSING DOCUMENTS OF SELLER.	B130	0.10	35.00
09/26/23	DNR	TELEPHONE CONFERENCE WITH INVESTOR REGARDING CASE STATUS AND CLAIMS PROCESS.	B110	0.10	35.00
09/26/23	DNR	CALL WITH AHUJA & CLARK REGARDING REMAINING INVESTMENT SPREADSHEET ISSUES.	B310	1.00	350.00
09/26/23	DNR	TELEPHONE CONFERENCE WITH INVESTOR REGARDING CLAIMS MOTION AND INVESTMENTS QUESTIONS.	B110	0.10	35.00
09/26/23	DNR	CORRESPONDENCE WITH CONTRACTOR REGARDING VENDOR INVOICES FROM CLEANUP.	B210	0.20	70.00
09/26/23	DNR	CORRESPONDENCE WITH OIL AND GAS COUNSEL REGARDING OPERATIONS ITEMS OUTSTANDING.	B210	0.20	70.00
09/26/23	PLH	REVIEW INFORMATION ON HEARTLAND ENTITIES AND TRANSACTIONS INVOLVING TIEP INVESTORS AND HEARTLAND FUNDS IN CONNECTION WITH PREPARING DEMAND LETTERS SEEKING TO CLAIM BACK FUNDS FROM THE TIEP INVESTORS.	B120	1.40	762.30
09/27/23	DNR	REVIEW AND RESPOND TO INVESTOR INQUIRIES.	B110	0.80	280.00
09/27/23	DNR	COMPILE AND SEND SELLER DOCUMENTATION FOR CLOSING ON ELECTRA PROPERTY TO TITLE COMPANY.	B130	0.20	70.00
09/27/23	DNR	CORRESPONDENCE WITH BROKER REGARDING ELDORADO RANCH PROPERTY.	B130	0.10	35.00
09/27/23	DNR	TELEPHONE CONFERENCE WITH TERESA E. GILTNER REGARDING REAL ESTATE PROPERTY CLOSINGS.	B130	0.20	70.00
09/27/23	DNR	CORRESPONDENCE WITH SEC COUNSEL REGARDING CALL ON CASE STATUS.	B110	0.10	35.00
09/27/23	DNR	TELEPHONE CONFERENCE WITH INVESTOR REGARDING QUESTIONS ON CLAIMS MOTION AND CASE STATUS.	B110	0.30	105.00
09/27/23	DNR	CORRESPONDENCE TO STRETTO REGARDING ADDITIONAL CLAIMS PACKETS.	B310	0.10	35.00
09/27/23	DNR	RECEIVE, REVIEW, AND FILE SUPPLEMENTAL CERTIFICATE OF SERVICE REGARDING CLAIMS PACKAGE FROM STRETTO.	B310	0.20	70.00
09/27/23	DNR	CORRESPONDENCE WITH SEC COUNSEL REGARDING POTENTIAL GOVERNMENT SHUTDOWN AND IMPACT ON CASE.	B110	0.40	140.00
09/27/23	DNR	TELEPHONE CONFERENCE WITH SOCIAL SECURITY ADMINISTRATION REGARDING NOTICES RECEIVED BY AOS AND VENTURES.	B240	0.30	105.00
09/27/23	DNR	CORRESPONDENCE WITH AHUJA & CLARK AND STRETTO	B310	0.40	140.00



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		REGARDING INVESTMENT SPREADSHEET AND CLAIMS PROCESS.			
09/27/23	DNR	RECEIVE AND PROCESS RECEIVER'S MAIL.	B210	0.30	105.00
09/27/23	DNR	CORRESPONDENCE TO COMPLIANCE TEAM REGARDING RAILROAD COMMISSION NOTICES.	B210	0.10	35.00
09/28/23	DNR	REVIEW AND RESPOND TO INVESTOR INQUIRIES.	B110	0.90	315.00
09/28/23	DNR	TELEPHONE CONFERENCE WITH INVESTOR REGARDING CLAIMS PROCEDURE AND CASE STATUS QUESTIONS.	B110	0.60	210.00
09/28/23	DNR	CORRESPONDENCE TO STRETTO REGARDING ADDITIONAL EMAILED PACKAGES FOR CLAIMS PROCESS.	B310	0.10	35.00
09/28/23	DNR	TELEPHONE CONFERENCE WITH INVESTOR REGARDING CLAIMS MOTION QUESTIONS.	B110	0.20	70.00
09/28/23	DNR	CALL WITH AHUJA & CLARK AND STRETTO REGARDING CLAIMS RECONCILIATION SPREADSHEETS.	B310	0.90	315.00
09/28/23	DNR	TELEPHONE CONFERENCE WITH VENDOR REGARDING INVOICE FOR CLEANUP.	B210	0.10	35.00
09/28/23	DNR	CORRESPONDENCE WITH CONTRACT OPERATOR REGARDING VENDOR CLEANUP INVOICES.	B210	0.20	70.00
09/28/23	DNR	CORRESPONDENCE TO CONTRACTOR REGARDING CLEANUP INVOICE AND PAYMENT OF SAME.	B210	0.10	35.00
09/28/23	DNR	CORRESPONDENCE WITH IBC BANK REGARDING CHECKS.	B210	0.20	70.00
09/28/23	DNR	DRAFT LETTER TO ROGER AND HARPRIT SAHOTA REGARDING REVISED 2022 PROFIT AND LOSS STATEMENT FOR BARRON PETROLEUM.	B240	0.20	70.00
09/28/23	DNR	CORRESPONDENCE WITH AHUJA & CLARK REGARDING REVISED 2022 PROFIT AND LOSS STATEMENT FOR BARRON PETROLEUM; REVIEW SAME.	B240	0.20	70.00
09/28/23	DNR	TELEPHONE CONFERENCE WITH VENDOR REGARDING QUESTIONS ON CLAIMS MOTION.	B110	0.10	35.00
09/28/23	DNR	CORRESPONDENCE WITH TERESA E. GUILTNER AND TITLE COMPANY REGARDING ELECTRA CLOSING.	B130	0.10	35.00
09/28/23	DNR	CORRESPONDENCE WITH BROKER REGARDING ELDORADO RANCH.	B130	0.10	35.00
09/28/23	DNR	TELEPHONE CONFERENCE WITH SEC COUNSEL REGARDING DISTRIBUTION.	B310	0.50	175.00
09/28/23	DNR	RECEIVE AND REVIEW EMAILS FROM GENERAL LAND OFFICE REGARDING OUTSTANDING REPORTS; SEND TO VICKI	B210	0.20	70.00



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		PALMOUR CCONSULTING.			
09/28/23	DNR	CORRESPONDENCE WITH CONTRACT OPERATOR REGARDING ROYALTY DISTRIBUTIONS.	B210	0.40	140.00
09/28/23	DNR	TELEPHONE CONFERENCE WITH DARRELL R. JONES REGARDING ABANDONMENT PROCESS.	B130	0.10	35.00
09/28/23	DNR	CORRESPONDENCE WITH COMPLIANCE TEAM REGARDING WELL SIGNS.	B210	0.20	70.00
09/28/23	TEG	CONTINUE WORK ON ELECTRA CLOSING MATTERS.	B130	1.00	526.50
09/28/23	TED	ADDRESS INVESTOR INQUIRIES.	B110	0.20	51.30
09/29/23	TED	ADDRESS INVESTOR INQUIRIES.	B110	0.20	51.30
09/29/23	DNR	CORRESPONDENCE WITH DEBORAH D. WILLIAMSON, BROKER, AND TERESA E. GILTNER REGARDING CLOSING ISSUES ON ELECTRA.	B130	0.30	105.00
09/29/23	DNR	TELEPHONE CONFERENCE WITH DEBORAH D. WILLIAMSON REGARDING CLOSING ITEMS ON ELECTRA.	B130	0.20	70.00
09/29/23	DNR	CORRESPONDENCE WITH COMPLIANCE TEAM REGARDING WELL SIGNS AND ABANDONMENT NOTICE ITEMS.	B210	0.50	175.00
09/29/23	DNR	TELEPHONE CONFERENCE WITH VICKI PALMOUR CONSULTING AND CONTRACT OPERATOR REGARDING DISTRIBUTION REPORTS AND PRODUCTION.	B210	0.40	140.00
09/29/23	DNR	TELEPHONE CONFERENCE WITH OIL AND GAS COUNSEL REGARDING ABANDONMENT PROCESS AND OPERATIONS ITEMS.	B210	0.50	175.00
09/29/23	DNR	REVIEW AND RESPOND TO INVESTOR INQUIRIES.	B110	1.00	350.00
09/29/23	DNR	TELEPHONE CONFERENCE WITH VICKI PALMOUR CONSULTING REGARDING SUSPENSE REPORTS AND ROYALTY OWNER ISSUES.	B210	0.30	105.00
09/29/23	DNR	TELEPHONE CONFERENCE WITH TERESA E. GILTNER REGARDING CLOSING ISSUES FOR ELECTRA.	B130	0.30	105.00
09/29/23	DNR	TELEPHONE CONFERENCE WITH TERESA E. GILTNER REGARDING ELECTRA DEED.	B130	0.10	35.00
09/29/23	DNR	RECEIVE AND PROCESS UTILITY BILL FOR ELECTRA.	B210	0.20	70.00
09/29/23	DNR	CORRESPONDENCE WITH TERESA E. GILTNER, BROKER, AND TITLE COMPANY REGARDING ELECTRA DEED AND BUYER SIGNATURE ITEMS.	B130	0.20	70.00
09/29/23	TEG	CONTINUE WORK ON CLOSING MATTERS.	B130	0.50	263.25



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DATE	ID	DESCRIPTION	TASK	HOURS	AMOUNT
09/29/23	PLH	REVIEW E-MAIL MS. WILLIAMSON AND CASE LAW ON MEDIATION OF CLAWBACK LITIGATION.	B120	0.40	217.80
09/29/23	PLH	REVIEW INFORMATION ON POTENTIAL CLAWBACK CLAIMS TO ADDRESS CLAWBACK DEMANDS.	B120	0.80	435.60
09/30/23	DNR	CORRESPONDENCE WITH OIL AND GAS COUNSEL AND CONTRACT OPERATOR REGARDING ABANDONMENT OF CERTAIN WELLS.	B130	0.40	140.00
09/30/23	DNR	RECEIVE AND REVIEW IBC BANK SEPTEMBER 2023 STATEMENTS; SEND TO AHUJA & CLARK.	B210	0.30	105.00
TOTAL				139.30	\$50,968.30



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BILLING SUMMARY

ID	TIMEKEEPER	TITLE	HOURS	RATE	AMOUNT
PLH	PATRICK HUFFSTICKLER	MEMBER	6.80	544.50	3,702.60
TEG	TERESA GILTNER	PARTICIPATING MEMBER	6.00	526.50	3,159.00
DNR	DANIELLE R. BEHRENDIS	SENIOR ATTORNEY	124.70	350.00	43,645.00
TED	THERESA E. DICK	PARALEGAL	1.80	256.50	461.70
	TOTAL		139.30		\$50,968.30



DEBORAH D WILLIAMSON
DEBORAH WILLIAMSON

MATTER #: 122686.000002
INVOICE #: 3550505
PAGE 27

OCTOBER 30, 2023

DISBURSEMENTS

DATE	DESCRIPTION	QUANTITY	RATE	AMOUNT
	FEDERAL EXPRESS/DELIVERY	1.00	19.30	19.30
	PHOTOCOPIES	439.00	0.10	43.90
	PRINTING EXPENSES	2,669.00	0.10	266.90
	RELATIVITY DATA HOSTING	1.00	3,320.00	3,320.00
	SCANNING	170.00	0.10	17.00
	TOTAL DISBURSEMENTS			3,671.10



DEBORAH D WILLIAMSON
DEBORAH WILLIAMSON

MATTER #: 122686.000002
INVOICE #: 3550505
PAGE 28

OCTOBER 30, 2023

TASK SUMMARY

TASK	TASK DESCRIPTION	HOURS	AMOUNT
B110	CASE ADMINISTRATION	29.50	10,156.70
B120	ASSET ANALYSIS AND RECOVERY	13.80	6,152.60
B130	ASSET DISPOSITION	21.00	8,409.00
B210	BUSINESS OPERATIONS	33.80	11,830.00
B240	TAX ISSUES	7.60	2,660.00
B310	CLAIMS ADMINISTRATION & OBJECT	31.30	10,955.00
BT155	STATUS REPORTS	0.10	35.00
BT160	LITIGATION CONSULTING	2.20	770.00
	TOTAL	139.30	50,968.30

EXPENSE SUMMARY

PHOTOCOPIES	43.90
SCANNING	17.00
PRINTING EXPENSES	266.90
FEDERAL EXPRESS/DELIVERY	19.30
RELATIVITY DATA HOSTING	3,320.00
TOTAL	3,671.10



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

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

DUE UPON RECEIPT

OCTOBER 30, 2023
MATTER #: 122686.000003
INVOICE #: 3550504

FOR PROFESSIONAL SERVICES RENDERED

RE: COUNSEL TRAVEL TIME

FEES	\$	157.50
DISBURSEMENTS		18.96
INVOICE TOTAL	\$	176.46



DEBORAH D WILLIAMSON
DEBORAH WILLIAMSON

MATTER #: 122686.000003
INVOICE #: 3550504
PAGE 2

OCTOBER 30, 2023

RE: COUNSEL TRAVEL TIME

DATE	ID	DESCRIPTION	TASK	HOURS
07/26/23	DNR	TRAVEL TO AND FROM AUCTIONEER LOCATION.	B130	0.90
		TOTAL		0.90



DEBORAH D WILLIAMSON
DEBORAH WILLIAMSON

MATTER #: 122686.000003
INVOICE #: 3550504
PAGE 3

OCTOBER 30, 2023

BILLING SUMMARY

TIMEKEEPER	HOURS	RATE	AMOUNT
DANIELLE R. BEHREND	0.90	175.00	157.50
TOTAL	0.90		\$157.50



DEBORAH D WILLIAMSON
DEBORAH WILLIAMSON

MATTER #: 122686.000003
INVOICE #: 3550504
PAGE 4

OCTOBER 30, 2023

DISBURSEMENTS

DATE	DESCRIPTION	AMOUNT
07/27/23	VENDOR: DANIELLE RUSHING BEHREND'S INVOICE#: 010032704037 DATE: 7/27/2023 - FROM:: 112 EAST PECAN STREET, SAN ANTONIO, TX, USA TO:: 14895 DONOP ROAD, ELMENDORF, TX, USA TO:: 112 EAST PECAN STREET, SAN ANTONIO, TX, USA - FROM:: 112 EAST PECAN STREET, SAN ANTONIO, TX, USA TO:: 14895 DONOP ROAD, ELMENDORF, TX, USA TO:: 112 EAST PECAN STREET, SAN ANTONIO, TX, USA	18.96
	TOTAL DISBURSEMENTS	18.96



DEBORAH D WILLIAMSON
DEBORAH WILLIAMSON

MATTER #: 122686.000003
INVOICE #: 3550504
PAGE 5

OCTOBER 30, 2023

TASK SUMMARY

TASK	TASK DESCRIPTION	HOURS	AMOUNT
B130	ASSET DISPOSITION	0.90	157.50
	TOTAL	0.90	157.50

EXPENSE SUMMARY

TRAVEL-EXCEPT AIRFARE, HOTELS AND MEALS	18.96
TOTAL	18.96



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

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

DUE UPON RECEIPT

OCTOBER 30, 2023
MATTER #: 122686.000003
INVOICE #: 3550503

FOR PROFESSIONAL SERVICES RENDERED

RE: COUNSEL TRAVEL TIME

FEES	\$	2,065.00
DISBURSEMENTS		975.75
INVOICE TOTAL	\$	3,040.75



DEBORAH D WILLIAMSON
DEBORAH WILLIAMSON

MATTER #: 122686.000003
INVOICE #: 3550503
PAGE 2

OCTOBER 30, 2023

RE: COUNSEL TRAVEL TIME

DATE	ID	DESCRIPTION	TASK	HOURS
08/21/23	DNR	TRAVEL TO DALLAS OFFICE PRIOR TO MEDIATION.	BT160	5.50
08/22/23	DNR	TRAVEL TO JAMS FOR MEDIATION.	BT160	0.80
08/22/23	DNR	TRAVEL BACK FROM MEDIATION IN DALLAS.	BT160	5.50
		TOTAL		11.80



DEBORAH D WILLIAMSON
DEBORAH WILLIAMSON

MATTER #: 122686.000003
INVOICE #: 3550503
PAGE 3

OCTOBER 30, 2023

BILLING SUMMARY

TIMEKEEPER	HOURS	RATE	AMOUNT
DANIELLE R. BEHREND	11.80	175.00	2,065.00
TOTAL	11.80		\$2,065.00



DEBORAH D WILLIAMSON
 DEBORAH WILLIAMSON

MATTER #: 122686.000003
 INVOICE #: 3550503
 PAGE 4

OCTOBER 30, 2023

DISBURSEMENTS

DATE	DESCRIPTION	AMOUNT
08/23/23	VENDOR: DEBORAH D. WILLIAMSON INVOICE#: 010033116330 DATE: 8/23/2023 - SEC MEDIATION - AUG 21-23 2023 - HOTEL - RENAISSANCE ST. ELM DALLAS (DEBORAH D. WILLIAMSON)	246.33
08/23/23	VENDOR: DEBORAH D. WILLIAMSON INVOICE#: 010033116330 DATE: 8/23/2023 - SEC MEDIATION - AUG 21-23 2023 - HOTEL - RENAISSANCE ST. ELM DALLAS (DANIELLE R. BEHREND)	320.70
08/24/23	VENDOR: DANIELLE RUSHING BEHREND INVOICE#: 010033127698 DATE: 8/24/2023 - SEC - EXPENSES FOR 08-21-23 - UBER EXPENSES FOR 08-21-23	19.48
08/24/23	VENDOR: DANIELLE RUSHING BEHREND INVOICE#: 010033127520 DATE: 8/24/2023 - MILEAGE FOR 08-22-23	196.00
08/24/23	VENDOR: DANIELLE RUSHING BEHREND INVOICE#: 010033126960 DATE: 8/24/2023 - SEC - MILEAGE FOR 08-21-23	193.24
	TOTAL DISBURSEMENTS	975.75



DEBORAH D WILLIAMSON
DEBORAH WILLIAMSON

MATTER #: 122686.000003
INVOICE #: 3550503
PAGE 5

OCTOBER 30, 2023

TASK SUMMARY

TASK	TASK DESCRIPTION	HOURS	AMOUNT
BT160	LITIGATION CONSULTING	11.80	2,065.00
	TOTAL	11.80	2,065.00

EXPENSE SUMMARY

TRAVEL-EXCEPT AIRFARE, HOTELS AND MEALS	408.72
TRAVEL-HOTEL	567.03
TOTAL	975.75

EXHIBIT E-2

Law Offices of Romero | Kozub
 235 N.E. Loop 820, Ste 105
 Fort Worth, Texas 76120
 United States 817.616.3067

Law Offices of Romero | Kozub

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

Balance \$977.50
Invoice # 00170
Invoice Date October 26, 2023
Payment Terms
Due Date

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

For services rendered between
 July 01, 2023 and September 30, 2023

Time Entries

Date	EE	Activity	Description	Rate	Hours	Line Total
07/24/2023	RR	Asset Disposition	Review and analyze Finding and Conclusions of Magistrate Judge (ECF No. 379)	\$425.00	0.6	\$255.00
08/09/2023	RR	Case Administration	Correspondence with D. Rushing Behrends	\$425.00	0.1	\$42.50
08/14/2023	RR	Asset Disposition	Review and analyze proposed order for ECF No. 386	\$425.00	0.2	\$85.00
08/23/2023	RR	Asset Disposition	Attend hearing	\$425.00	0.3	\$127.50
09/07/2023	RR	Case Administration	Attend hearing	\$425.00	0.5	\$212.50
09/11/2023	RR	Claims Administration	Review and analyze Claims Procedure Motion and proposed order; Correspondence with D. Rushing Behrends	\$425.00	0.6	\$255.00

Totals: **2.3** **\$977.50**

Time Entry Sub-Total:	\$977.50
Sub-Total:	\$977.50
Total:	\$977.50
Amount Paid:	\$0.00
Balance Due:	\$977.50

EXHIBIT E-3

drj@oilesquire.com
(832) 302-5373

August 04, 2023

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

Invoice Number: 873
Invoice Period: 07-01-2023 - 07-31-2023

Payment Terms: Upon Receipt
Make check payable to the Law Practice of Darrell R. Jones, PLLC
RE: Receiver for Barron Petroleum LLC, Barron Energy Corporation and Affiliated Entities

Time Details

Date	Professional	Task	Hours	Rate	Amount
07-02-2023	Darrell Jones	B130 - Asset Disposition Discussion of Val Verde operations and sales volumes with S. Robinowitz to frame discussions same day with counsel for SDMB.	0.90	325.00	292.50
07-05-2023	Eric Hillerman	B130 – Asset Disposition Work regarding pollution and plugging issues. GLO reporting. Plugging deals with surface owners. work regarding TRRC notices of violation.	1.20	325.00	390.00
07-05-2023	Darrell Jones	B210 - Business Operations Attend client management team meeting.	1.00	325.00	325.00
07-07-2023	Eric Hillerman	B130 – Asset Disposition Work regarding enviro and ops complaints and responses. Work regarding plugging deals.	0.50	325.00	162.50
07-10-2023	Eric Hillerman	B130 – Asset Disposition Work with surface owners regarding plugging deals.	0.60	325.00	195.00
07-11-2023	Eric Hillerman	B130 – Asset Disposition Work regarding TRRC issues. Work regarding plugging matters. Work regarding Shurley ranch issues.	0.40	325.00	130.00
07-13-2023	Darrell Jones	BT155 – Status Reports Prepare inserts to quarterly report.	1.00	325.00	325.00
07-17-2023	Eric Hillerman	B130 – Asset Disposition Work regarding TRRC hearing status and P4 and P5 issues; potential solution with surface owner regarding pit and rig on property; issues with farmout operations.	0.80	325.00	260.00
07-17-2023	Darrell Jones	B210 – Business Operations Weekly meeting with client's management team.	1.00	325.00	325.00
07-18-2023	Eric Hillerman	B130 – Asset Disposition Work regarding good faith hearing issues with TRRC regarding Sparks and Hall deals/proposals. Work on TRCC notices.	0.30	325.00	97.50
07-19-2023	Eric Hillerman	B130 – Asset Disposition Work regarding La Salle Ranch deal negotiations. Work regarding safety notices from TRRC.	0.40	325.00	130.00
07-24-2023	Eric Hillerman	B130 – Asset Disposition Work regarding issues with General Land Office. Work regarding plugging deals, Hall proposals; TRRC notices	1.60	325.00	520.00

07-24-2023	Darrell Jones	B210 - Business Operations	0.50	325.00	162.50
	Attend scheduled team meeting.				
07-25-2023	Eric Hillerman	B130 – Asset Disposition	0.30	325.00	97.50
	Work regarding Sparks good faith hearing at TRRC. Work regarding GLO and plugging deals.				
07-31-2023	Eric Hillerman	B130 – Asset Disposition	1.00	325.00	325.00
	Work regarding Sparks hearing issues; Leann well cleanup and plugging deals.				

Total 3,737.50

Time Summary

Professional

Darrell Jones
Eric Hillerman

Hours	Amount
4.40	1,430.00
7.10	2,307.50

Total 3,737.50

Total for this Invoice 3,737.50

drj@oilesquire.com
(832) 302-5373

September 04, 2023

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

Invoice Number: 884

Invoice Period: 08-01-2023 - 08-31-2023

Payment Terms: Upon Receipt

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

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

Time Details

Date	Professional	Task	Hours	Rate	Amount
08-01-2023	Eric Hillerman	B130 – Asset Disposition Work regarding Greg Brown contract.	0.20	325.00	65.00
08-03-2023	Eric Hillerman	B130 – Asset Disposition Work regarding TRRC notices regarding testing etc, Sparks Hearing and plugging	0.50	325.00	162.50
08-07-2023	Eric Hillerman	B130 – Asset Disposition Work on La Salle Ranch plugging and surface restoration deal. Work regarding Sparks Good Faith hearing issues; farmout issues and GLO matter.	1.20	325.00	390.00
08-07-2023	Darrell Jones	B210 - Business Operations Client management team meeting.	1.00	325.00	325.00
08-14-2023	Eric Hillerman	B130 – Asset Disposition Work regarding cleanup updates, farmout operations and plugging deal with La Salle Cattle Ltd. Conf with La Salle Cattle regarding approved terms of deal.	1.20	325.00	390.00
08-15-2023	Eric Hillerman	B130 – Asset Disposition Work regarding latest group of TRCC demands and notices. Work regarding surface restoration and plugging deal with Zacharias group.	0.30	325.00	97.50
08-16-2023	Eric Hillerman	B130 – Asset Disposition Final drafting and work regarding plugging and site restoration agreement with surface owner La Salle Cattle Co Ltd. Work regarding TRRC notices.	2.50	325.00	812.50
08-18-2023	Eric Hillerman	B130 – Asset Disposition Conf With Greg Brown regarding plugging agreement terms and timing. Work regarding title review.	0.30	325.00	97.50
08-24-2023	Eric Hillerman	B210 – Business Operations Work regarding TRCC notices; environmental issues and plugging with La Salle Cattle Co.	0.60	325.00	195.00
08-30-2023	Eric Hillerman	B130 – Asset Disposition Work regarding Sparks hearing; General Land Office, landowner requests regarding his ranch; Ranger statement. Work regarding La Salle Ranch deal.	0.90	325.00	292.50
08-31-2023	Eric Hillerman	B130 – Asset Disposition Work with La Salle Cattle regarding deal terms.	0.40	325.00	130.00
Total					2,957.50

Professional
Darrell Jones
Eric Hillerman

	Hours	Amount
	1.00	325.00
	8.10	2,632.50
Total		2,957.50

Total for this Invoice 2,957.50

drj@oilesquire.com
(832) 302-5373

October 04, 2023

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

Invoice Number: 894

Invoice Period: 09-01-2023 - 09-30-2023

Payment Terms: Upon Receipt

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

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

Time Details

Date	Professional	Task	Hours	Rate	Amount
09-05-2023	Eric Hillerman	B130 – Asset Disposition Work regarding abandonment issues, environmental, electric, signage, recording notices, EnergyNet accounts, La Salle cattle agreement edits.	1.50	325.00	487.50
09-05-2023	Darrell Jones	B130 – Asset Disposition Team meeting to chart path forward after abandonment order.	1.40	325.00	455.00
09-06-2023	Darrell Jones	B130 – Asset Disposition Team meeting to discuss developments on abandonment motion, path forward and insurance topics. Discuss Val Verde wells and related matters.	1.00	325.00	325.00
09-07-2023	Eric Hillerman	B130 – Asset Disposition La Salle Cattle plugging agreement work.	0.20	325.00	65.00
09-08-2023	Eric Hillerman	B130 – Asset Disposition Work regarding TRCC notices. Work regarding Warren Fonville O&G lease inquiry on Palo Pinto Ranch.	0.50	325.00	162.50
09-11-2023	Eric Hillerman	B130 – Asset Disposition Work regarding Warren Fonville lease and surface issues on Palo Pinto Ranch. Work regarding La Salle cattle flowline removal issue.	1.00	325.00	325.00
09-12-2023	Eric Hillerman	B130 – Asset Disposition Work regarding La Salle Cattle LLC agreement and EnergyNet.com.	0.30	325.00	97.50
09-13-2023	Eric Hillerman	B130 – Asset Disposition Work regarding La Salle deal and TRCC matters. Work regarding abandonment issues.	0.50	325.00	162.50
09-14-2023	Eric Hillerman	B210 – Business Operations Work regarding TRRC matters including notice on Parmer SWD and prep response.	0.80	325.00	260.00
09-15-2023	Eric Hillerman	B130 – Asset Disposition Work regarding Bob Hughes Oil Co property tax indemnity claim; work regarding plugging matter on La Salle Cattle Ranch; work regarding Parmer SWD issues.	1.90	325.00	617.50
09-18-2023	Eric Hillerman	B130 – Asset Disposition Work regarding abandonment issues. Work regarding enviro notices royalty and JOA issues. Work regarding response to Bob Hughes/JABS Holdings regarding taxes on Schleicher Co. properties.	3.50	325.00	1,137.50
09-18-2023	Darrell Jones	B130 – Asset Disposition	1.10	325.00	357.50

Date	Professional	Project	Hours	Rate	Amount
09-19-2023	Eric Hillerman	B130 – Asset Disposition	1.60	325.00	520.00
		Work regarding abandonment issues and indemnity claims from Bob Hughes Oil.			
09-20-2023	Eric Hillerman	B130 – Asset Disposition	0.30	325.00	97.50
		Work regarding TRRC notices, SDMB report, and abandonment.			
09-21-2023	Eric Hillerman	B130 – Asset Disposition	1.70	325.00	552.50
		Work regarding pipeline leak on La Salle cattle ranch. Work regarding abandonment.			
09-22-2023	Eric Hillerman	B210 – Business Operations	1.90	325.00	617.50
		Work regarding pipeline leak issue in Palo Pinto County; issues regarding surface owner. pipeline leak status and probable ownership/operator-ship; TRRC.			
09-25-2023	Eric Hillerman	B130 – Asset Disposition	2.70	325.00	877.50
		Work regarding abandonment issues, notice issues, leak response in Palo Pinto County.			
09-26-2023	Eric Hillerman	B130 – Asset Disposition	0.30	325.00	97.50
		Work regarding abandonment and leak on La Salle ranch.			
09-27-2023	Darrell Jones	B130 – Asset Disposition	1.40	325.00	455.00
		Meeting with S. Robinowitz to discuss various environmental risks and mitigation steps, abandonment of select wells, Sutton County gas sales.			
09-28-2023	Darrell Jones	B130 – Asset Disposition	2.30	325.00	747.50
		Attention to pipeline and well abandonment matters with E. Hillerman.			
09-29-2023	Eric Hillerman	B130 – Asset Disposition	2.40	325.00	780.00
		Work regarding abandonment related issues and drafts on notices. Work regarding landowner and royalty issues.			
09-29-2023	Darrell Jones	B130 – Asset Disposition	1.30	325.00	422.50
		Attention to pipeline and well abandonment matters with E. Hillerman.			
09-30-2023	Eric Hillerman	B130 – Asset Disposition	0.50	325.00	162.50
		Work regarding abandonment issues regarding wells and pipelines.			

Total 9,782.50

Time Summary

Professional	Hours	Amount
Darrell Jones	8.50	2,762.50
Eric Hillerman	21.60	7,020.00
Total		9,782.50

Total for this Invoice 9,782.50

EXHIBIT E-4

VICKI PALMOUR CONSULTING LLC

QUARTERLY ACCOUNTING
 (JULY, AUGUST, SEPTEMBER 2023)
 INVOICE # 19210, 19348, 19493

		HOURS	TOTAL BILLED
BT210	VICKI PALMOUR	12.5	\$ 1,250.00
BT210	TAMMY JOBE	9	\$ 900.00
BT210	JENNIFER RIGGINS	9	\$ 900.00
BT210	TYNA GOBER	20	\$ 2,000.00
BT210	AMY AMBURN	0	\$ -
	TOTAL REGULATORY	50.5	\$ 5,050.00
BT120	AMY AMBURN	12	\$ 1,200.00
BT120	TAMMY JOBE	0	\$ -
BT120	JENNIFER RIGGINS	17.5	\$ 1,750.00
	TOTAL ACCOUNTING	29.5	\$ 2,950.00
	REIMBURSED EXPENSES		\$ -
	TOTAL		\$ 8,000.00

Vicki Palmour Consulting, LLC

PO Box 1925
Graham Texas 76450

Date	Invoice #
9/30/2023	19493

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

Terms
Due on receipt

Quantity	Description	Rate	Amount
	REGULATORY WORK		
1	BT210 - 9/5/23 - VP - Conference Call with Danielle, Deborah, Scott, Darrell, Eric	100.00	100.00
1	BT210 - 9/5/23 - TJ - Prepare and File G-10 Retest	100.00	100.00
2	BT210 - 9/7/23 - TJ - Prepare and File July PR's for ArcoOil and Leading Edge	100.00	200.00
2	BT210 - 9/12/23 - TG - Prepare GLO 2 and GLO 3 on Shurley Ranch # 1G and Shurley Ranch # 1D	100.00	200.00
1.25	BT210 - 9/18/23 - VP - Conference Call with Danielle, Deborah, Scott, Darrell, Eric	100.00	125.00
0.5	BT210 - 9/25/23 - VP - Conference Call with Danielle, Deborah, Darrell, Eric	100.00	50.00
	ACCOUNTING WORK		
4	BT120 - 9/19/23 - AA - Distribution/JIB on Heartland Wells	100.00	400.00
1.5	BT120 - 9/18/23 - AA - Send Owner Detail List with Addresses for Barron, PCE, Dodson Wells	100.00	150.00
1.5	BT120 - 9/20/23 - AA - Suspense Research and Reports	100.00	150.00
0.5	BT120 - 9/21/23 - AA - Phone Call with Danielle Explaining/Discussing Suspense	100.00	50.00
3	BT120 - 9/23/23 - AA - Flush Petty Suspense Distribution on Panther City and Barron; Phone Call with Danielle	100.00	300.00
0.5	BT120 - 9/29/23 - AA - Conference Call (Amy, Danielle, Scott) Discussing Owner List and Potential Revenue Thru 10/6/23	100.00	50.00
	Sales Tax	6.75%	0.00

Total	\$1,875.00
--------------	-------------------

PO Box 1925
 Graham Texas 76450

Date	Invoice #
8/31/2023	19348

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

Terms
Due on receipt

Quantity	Description	Rate	Amount
	REGULATORY WORK		
1	BT210 - VP - 8/7/23 - Conference Call with Deborah, Danielle, Darrell, Eric, Scott	100.00	100.00
4	BT210 - TG - 8/8/23 - Work on GLO Corrections (Shurley # 1D and Shurley # 1G)	100.00	400.00
3	BT210 - TG - 8/9/23 - Work on GLO Corrections (Shurley # 1D and Shurley # 1G)	100.00	300.00
2	BT210 - TG - 8/10/23 - Work on GLO Corrections (Shurley # 1D and Shurley # 1G)	100.00	200.00
3	BT210 - VP - 8/11/23 - Work on/Review GLO Corrections on Shurley # 1D and Shurley # 1G)	100.00	300.00
1.5	BT210 - TJ - 8/14/23 - File PR's for ArcoOil; Leading Edge; Barron; Dodson Prairie; Panther City	100.00	150.00
5.5	BT210 - JR - 8/21/23 - File H-10's on T L Burnett A # 35; T L Burnett A # 42; TJ & JL Waggoner # 27; TJ Waggoner "C" # 19; TJ Waggoner "C" # 20; TJ Waggoner "C" # 22; J & J Waggoner B # 5; J & J Waggoner # 51; TJ & JL Waggoner C # 7A; # 13; # 26; # 29; TJ & JL Waggoner # 12	100.00	550.00
2	BT210 - TG - 8/23/23 - File GLO-2 and GLO-3 on Shurley # 1D and Shurley # 1G for March 2020 and June 2023	100.00	200.00
7	BT210 - TG - 8/28/23 - Review ArcoOil, Leading Edge, Barron, Panther City & Dodson Prairie Wells for Critical Infrastructure Semi-Annual Filing with RRC; File Reports, Etc.	100.00	700.00
	Sales Tax	6.75%	0.00

Total	\$2,900.00
--------------	-------------------

PO Box 1925
 Graham Texas 76450

Date	Invoice #
7/31/2023	19210

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

Terms
Due on receipt

Quantity	Description	Rate	Amount
	REGULATORY WORK		
1	BT210 - VP - 7/5/23 - Phone Conference with Danielle, Deborah, Darrell, Eric	100.00	100.00
2	BT210 - TJ - 7/7/23 - File W-10 on Eddleman for ArcoOil; G-10 on Mike Holland EtAl # 121064 , Mike Holland "B" #3 121083, Gary Stallings EtAl # 126943, C. B. Long "C" # 175404 for Panther City; Hinkson # 176298, Hinkson # 177559, E. T. Noland # 032138, Hinkson # 133589, Hinkson # 141020, Hinkson # 147901, Hinkson # 153581, Hinkson # 161177, Hinkson # 166330, Ankenbauer # 169206 for Dodson Prairie	100.00	200.00
1	BT210 - TJ - 7/10/23 - File May 2023 PR's for Leading Edge and ArcoOil	100.00	100.00
0.5	BT210 - VP - 7/10/23 - Phone Conference with Danielle, Deborah, Scott	100.00	50.00
1	BT210 - TJ - 7/11/23 - File May 2023 PR's for Barron, Dodson Prairie, Panther City	100.00	100.00
1.5	BT210 - JR - 7/11/23 - Prepare and File H-10's on Whittenburg # 5 and Burnett # 14	100.00	150.00
0.5	BT210 - TJ - 7/12/23 - File Corrected PR's on Barron	100.00	50.00
2	BT210 - JR - 7/15/23 - File Comptroller Reports	100.00	200.00
0.5	BT210 - VP - 7/17/23 - Phone Conference with Danielle, Deborah, Scott, Darrell	100.00	50.00
1	BT210 - VP - 7/20/23 - Phone Con with Scott Discussing Betty and Crawford Violations, Severances, Cleanup, Etc.	100.00	100.00
0.5	BT210 - VP - 7/21/23 - Review and Respond to Cleanup/Pictures on Betty and Crawford Violations, Etc.	100.00	50.00
0.75	BT210 - VP - 7/24/23 - Conference Call with Danielle, Scott, Darrell, Eric	100.00	75.00

Total

PO Box 1925
 Graham Texas 76450

Date	Invoice #
7/31/2023	19210

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

Terms
Due on receipt

Quantity	Description	Rate	Amount
1	BT210 - VP - 7/24/23 - Review Electronic Reporting Agreement with GLO, Discuss with Eric, Sign and Return to Danielle	100.00	100.00
0.5	BT210 - VP - 7/31/23 - Conference Call with Danielle, Scott, Deborah, Darrell, Eric ACCOUNTING WORK	100.00	50.00
1	BT120 - AA - 7/7/23 - Search BT Midstream & Fuel; Email Results	100.00	100.00
2.5	BT120 - TG - 7/27/23 - Research and Emails with General Land Office on Set Up of Shurley # 1D and # 1G, Etc.	100.00	250.00
7	BT120 - TG - 7/28/23 - Work on Filing GLO-2's on Shurley # 1D and # 1G from May 2020 thru May 2023, Etc	100.00	700.00
4	BT120 - TG - 7/29/23 - Work on Filing GLO-2's and GLO-3 on Shurley # 1D and # 1G from May 2020 thru May 2023, Etc.	100.00	400.00
4	BT120 - TG - 7/31/23 - Reconciling/E-Filing of GLO-2's and Prepare GLO-3 on Shurley # 1D and # 1G from May 2020 thru May 2023, Etc.	100.00	400.00
	Sales Tax	6.75%	0.00

Total	\$3,225.00
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EXHIBIT E-5

**Ahuja & Clark, PLLC**

Certified Public Accountants

Tax & Accounting • Business Valuation • Business Interruption • Forensic Accounting

Ahuja & Clark, PLLC

2901 N. Dallas Pkwy
Suite 320
Plano, TX 75093

Invoice # 8229.HL

Invoice Date: 9/30/2023

Due Date: 10/31/2023

Bill To:

Dykema

Attn: Deborah Williamson

Date	ID	Description	Task	Hours	Amount
07/05/23	MA	Discussion on natural gas/diesel reports, and Harpreet's email with Ms. Behrends, Ms. Williamson, and Ms. Huser	3900	0.80	\$260.00
07/05/23	MA	Update team on action items and email to Ms. Behrends	3900	0.20	\$65.00
07/05/23	SH	Open tax and accounting issues; discussion with Ms. Williamson, Ms. Behrends, Ms. Ahuja	2900	0.80	\$200.00
07/05/23	SH	Documentation for Receiver: financials for Sahota Schedule C filed tax returns for 2021 and 2022, related documentation	2900	1.20	\$300.00
07/06/23	TC	Perform research and add addresses for TIEP investors; begin to perform research to identify Heartland entities receiving funds from TIEP investors and Feeder Funds	4900	5.00	\$1,250.00
07/06/23	SH	Preparation of balance sheets; review of data; research diesel fuel transactions for 2020/2021 in Barron Petroleum	2900	1.50	\$375.00
07/06/23	LD	Reviewed notices received for Barron petroleum	3900	0.70	\$126.00
07/06/23	LD	Downloaded documents from email for Heartland Production and Recovery Fund LLC and saved them in the respective folders, updated tracker and linked the documents to notices tracker.	3900	0.60	\$108.00
07/07/23	TC	Perform research using Heartland bank records, QuickBooks, 1099 documents, internal schedules, and portal information to identify Heartland entities disbursing and receiving funds related to TIEP investors; prepare summary schedule of research performed.	4900	3.80	\$950.00
07/07/23	MA	IRS hearing regarding Barton Petroleum payroll taxes (30 min); Update Ms. Williamson regarding the IRS hearing (18 min); Reviewed hearing documents prior to the hearing (12 min)	3900	1.00	\$325.00
07/07/23	SH	Review documents provided regarding fuel/dyed diesel as pertains to potential tax filings	2900	1.40	\$350.00
07/10/23	SH	Barron Petroleum review of General Ledger transactions for diesel fuel entries and payees as may relate to tax obligations	2900	1.00	\$250.00
07/10/23	MA	Review of emails from Ms. Palmore's office and from the Comptroller regarding diesel tax filing	3900	0.50	\$162.50
07/10/23	MA	Analysis of diesel tax reports with Ms. Huser	3900	0.50	\$162.50
07/11/23	DS	Calculation of Dallas Resources depreciation for aircraft for 2019, 2020, 2021 and 2022 & tax due in 2022	3900	2.30	\$575.00
07/11/23	SH	Determining ownership of Val Verde leases and other assets	2900	0.80	\$200.00
07/12/23	MA	Review of single member limited liability company and its application to receivership entities filed as Schedule C on Form 1040	3900	2.00	\$650.00
07/13/23	SH	Update meeting with Ms. Behrends	2900	0.50	\$125.00
07/14/23	SH	Draft Q2 accounting summary	2900	0.20	\$50.00
07/14/23	CB	Drafted Q2 forensic summary for Receiver	4900	0.20	\$65.00

Date	ID	Description	Task	Hours	Amount
07/17/23	TC	Perform research using Heartland bank records, QuickBooks, 1099 documents, internal schedules, and portal information to identify Heartland entities disbursing and receiving funds related to TIEP investors; prepare summary schedule of research performed.	4900	5.10	\$1,275.00
07/17/23	LD	Downloaded and saved balance sheets for all entities	3900	1.30	\$234.00
07/17/23	TC	Meeting with Ms. Williamson, Ms. Behrends, Ms. Ahuja, Ms. Huser and Ms. Bremer to discuss tax questions and forensic analysis related to TIEP investors.	4900	1.00	\$250.00
07/17/23	MA	Review of Dallas Resources tax returns after inclusion of aircraft for 2019, 2020 and 2021 (1.5 hours). Review procedures to add an asset on tax return (1 hour). Review of reporting on Barron Petroleum and how that impacts the reporting on Dallas Resources (1 hour). Meeting with Ms. Williamson, Ms. Rushing, Mr. Cecil, Ms. Huser and Ms. Bremer (1 hour).	3900	4.50	\$1,462.50
07/17/23	SH	Second quarter accounting	2900	3.90	\$975.00
07/17/23	SH	Update meeting with Ms. Williamson, Ms. Behrends, Ms. Ahuja, Ms. Bremer, and Mr. Cecil	2900	1.00	\$250.00
07/17/23	CB	Meeting with Ms. Williamson, Ms. Behrends, Ms. Ahuja, Ms. Huser and Mr. Cecil to discuss tax questions and forensic analysis related to TIEP investors.	4900	1.00	\$325.00
07/17/23	CB	Review of TIEP investor analysis in preparation for Receiver meeting.	4900	0.30	\$97.50
07/17/23	CB	Searched and pulled files from relativity of interest payment details from Nov 2019 through Sept 2021.	4900	2.70	\$877.50
07/17/23	DS	Preparing the Dallas Resources, Inc. tax return including the airplane under different methods & considerations for single member limited liability companies as Form 1041	3900	5.30	\$1,325.00
07/18/23	TC	Perform research using Heartland bank records, QuickBooks, 1099 documents, internal schedules, and portal information to identify Heartland entities disbursing and receiving funds related to TIEP investors; prepare summary schedule of research performed.	4900	7.40	\$1,850.00
07/18/23	SH	Second quarter accounting and preparation of draft receipts and disbursements report	2900	4.00	\$1,000.00
07/18/23	CB	Searched and pulled files from relativity of interest payment details prior to Nov 2019.	4900	0.60	\$195.00
07/19/23	TC	Perform research using Heartland bank records, QuickBooks, 1099 documents, internal schedules, and portal information to identify Heartland entities disbursing and receiving funds related to TIEP investors; prepare summary schedule of research performed.	4900	5.30	\$1,325.00
07/19/23	CB	Reviewed and downloaded interest payment files from Relativity.	4900	0.90	\$292.50
07/19/23	TC	Call with Ms. Behrends to obtain clarification on data to include in summary schedule listing disbursements and receipts for TIEP investors.	4900	0.40	\$100.00
07/19/23	SH	Continue preparation of cash and disbursements report with additional information received	2900	1.50	\$375.00
07/19/23	SH	Call with Ms. Behrends to discuss SSA notices; review of notices and reports related to resolution	2900	1.00	\$250.00
07/20/23	TC	Perform research using Heartland bank records, QuickBooks, 1099 documents, internal schedules, and portal information to identify Heartland entities disbursing and receiving funds related to TIEP investors; prepare summary schedule of research performed.	4900	5.50	\$1,375.00
07/20/23	CB	Review of TIEP investor rollovers to validate HL interest paid.	4900	3.90	\$1,267.50
07/20/23	DS	Update Form 3115 for Dallas Resources, Inc.	3900	2.00	\$500.00

Date	ID	Description	Task	Hours	Amount
07/20/23	MA	Review of available information for SSA notices and course of action needed	3900	0.50	\$162.50
07/20/23	SH	Review of TIEP investor rollovers to validate Heartland interest paid.	4900	4.00	\$1,000.00
07/20/23	SH	Wage payment verification for 2021 entities per SSA notice; W2/W3 forms not filed, related discussions	2900	1.50	\$375.00
07/21/23	CB	Review of TIEP investor rollovers to validate HL interest paid.	4900	5.70	\$1,852.50
07/21/23	TC	Perform research using Heartland bank records, QuickBooks, 1099 documents, internal schedules, and portal information to identify Heartland entities disbursing and receiving funds related to TIEP investors; prepare summary schedule of research performed.	4900	3.60	\$900.00
07/21/23	MA	Review of Form 3115 questions for Dallas Resources.	3900	2.00	\$650.00
07/21/23	SH	Review of TIEP investor rollovers to validate HL interest paid; trace transactions through various QuickBooks files and related reports	4900	4.50	\$1,125.00
07/21/23	DS	Continue to update Form 3115 for Dallas Resources, Inc.	3900	2.80	\$700.00
07/21/23	SH	Discussion with Ms. Bremer and Mr. Cecil on task related to HL interest.	4900	0.00	\$0.00
07/21/23	SH	Call with Ms. Behrends to discuss SSA notices	2900	0.30	\$75.00
07/24/23	CB	Review of TIEP investor rollovers to validate HL interest paid.	4900	6.20	\$2,015.00
07/24/23	TC	Perform research using Heartland bank records, QuickBooks, 1099 documents, internal schedules, and portal information to identify Heartland entities disbursing and receiving funds related to TIEP investors; prepare summary schedule of research performed.	4900	5.90	\$1,475.00
07/24/23	MA	Edit Form 3115 with sections for the applicable change in depreciation with staff	3900	4.00	\$1,300.00
07/24/23	SH	Analyze entities' QuickBooks and bank activity for investor interest payments	4900	2.80	\$700.00
07/24/23	DS	Review of all tax issues for Dallas Resources and Barron Petroleum	3900	4.00	\$1,000.00
07/24/23	SH	Update receipts and disbursements report with information received	4900	0.80	\$200.00
07/25/23	CB	Review of TIEP investor rollovers to validate HL interest paid.	4900	2.60	\$845.00
07/25/23	CB	Update call with Receiver, Ms. Behrends, Ms. Ahuja, Ms. Huser, and Mr. Cecil to discuss questions and TIEP investor summary schedule	4900	1.00	\$325.00
07/25/23	DS	Prepare the tax return to include airplane in Dallas Resources from 2019 and claim regular depreciation	3900	0.75	\$187.50
07/25/23	TC	Perform research using Heartland bank records, QuickBooks, 1099 documents, internal schedules, and portal information to identify Heartland entities disbursing and receiving funds related to TIEP investors; prepare summary schedule of research performed.	4900	2.70	\$675.00
07/25/23	TC	Update call with Receiver, Ms. Behrends, Ms. Ahuja, Ms. Huser, and Ms. Bremer to discuss questions and TIEP investor summary schedule	4900	1.00	\$250.00
07/25/23	TC	Discussion with Ms. Bremer and Ms. Huser regarding questions and progress on Heartland interest paid to TIEP investors	4900	0.30	\$75.00
07/25/23	SH	Discussion with Mr. Cecil and Ms. Bremer regarding questions and progress on Heartland interest paid to TIEP investors	4900	0.30	\$75.00
07/25/23	LD	Downloaded from email and saved the property tax notices received for Arco oil Corp and Panther City Energy LLC	3900	0.20	\$36.00
07/25/23	MA	Update call with Receiver, Ms. Behrends, Ms. Bremer, Ms. Huser, and Mr. Cecil to discuss questions and TIEP investor summary schedule.	3900	1.00	\$325.00

Date	ID	Description	Task	Hours	Amount
07/25/23	SH	Update meeting with Ms. Williamson, Ms. Behrends, Mr. Cecil, Ms. Ahuja, and Ms. Bremer to discuss tax, accounting, and forensic items	2900	1.00	\$250.00
07/25/23	SH	Trace investor transactions in QuickBooks files for payment information	4900	2.00	\$500.00
07/25/23	SH	Update cash and disbursements report format per comments, related discussions	2900	0.50	\$125.00
07/26/23	MA	Review revisions to Form 3115 for application for change in accounting method (Dallas Resources). Review return. Email to receiver.	3900	8.00	\$2,600.00
07/26/23	CB	Review of TIEP investor rollovers to validate HL interest paid.	4900	4.20	\$1,365.00
07/26/23	SH	Finalize Q2 2023 Standard Fund Accounting Report and Cash and Disbursements report	2900	0.20	\$50.00
07/27/23	CB	Review of TIEP investor rollovers to validate HL interest paid and source of funds	4900	1.20	\$390.00
07/27/23	MA	Call with Ms. Williamson and Ms. Behrends to discuss the amendment to Dallas Resources and Barron Petroleum fax from IRS.	3900	0.50	\$162.50
07/27/23	DS	Recalculate all the tax return for 50% business usage of airplane	3900	1.00	\$250.00
07/27/23	DS	Recalculate all the tax return for 10% business usage of airplane	3900	1.50	\$375.00
07/27/23	SH	Review and calculations regarding 2021 payroll	2900	0.50	\$125.00
07/27/23	LD	Saved IRS letter response to the 940, 941 hearing notice for Barron Petroleum LLC	3900	0.20	\$36.00
07/28/23	CB	Review of TIEP investor rollovers to validate HL interest paid and source of funds	4900	4.70	\$1,527.50
07/28/23	SH	Trace bank activity and related investor transaction entries in QuickBooks	4900	1.30	\$325.00
07/28/23	SH	Continuation of review of payroll, accounting, and tax information for 2021 preparation of W2s	2900	0.70	\$175.00
07/31/23	CB	Review of TIEP investor rollovers to validate HL interest paid and source of funds	4900	5.60	\$1,820.00
07/31/23	SH	Review of TIEP investor rollovers to validate Heartland interest paid and source of funds	4900	2.50	\$625.00
07/31/23	SH	Payroll entry for Alternate Office Solutions & Heartland Group Ventures; Review of bank statements and QuickBooks entries to determine completeness of data for reporting	2900	2.00	\$500.00
08/01/23	SH	Review of TIEP investor rollovers to validate HL interest paid and source of funds	4900	4.30	\$1,075.00
08/01/23	CB	Review of TIEP investor rollovers to validate HL interest paid and source of funds	4900	5.10	\$1,657.50
08/02/23	TC	Prepare TIEP investor schedule requested by Ms. Menchaca.	4900	0.50	\$125.00
08/03/23	CB	Review of TIEP investor rollovers to validate HL interest paid and source of funds	4900	2.60	\$845.00
08/04/23	CB	Review of TIEP investor rollovers to validate HL interest paid and source of funds	4900	5.40	\$1,755.00
08/04/23	SH	Complete calculations and prepare options for discussion regarding SSA notices for AOS and Heartland Group Ventures	2900	3.20	\$800.00
08/06/23	CB	Review of TIEP investor rollovers to validate HL interest paid and source of funds	4900	1.80	\$585.00
08/07/23	CB	Review of TIEP investor rollovers to validate HL interest paid and source of funds	4900	4.20	\$1,365.00
08/07/23	SH	Prepare multi-year balance sheet reports for Receivership entities, W2/941/940 preparation and calculations	2900	6.20	\$1,550.00
08/07/23	TC	Summarize the number of Heartland investors and the amount of investment funds raised for each of the Heartland funds.	4900	2.90	\$725.00
08/08/23	CB	Review of TIEP investor rollovers to validate HL interest paid and source of funds	4900	4.40	\$1,430.00

Date	ID	Description	Task	Hours	Amount
08/08/23	SH	Update call with Ms. Williamson, Ms. Behrends, Mr. Cecil, and Ms. Bremer	2900	1.00	\$250.00
08/08/23	CB	Receiver update call with Ms. Williamson, Ms. Behrends, Ms. Huser and Mr. Cecil.	4900	1.00	\$325.00
08/08/23	SH	Data for 2021 Form 940, related documents	2900	1.00	\$250.00
08/08/23	TC	Receiver update call with Ms. Williamson, Ms. Behrends, Ms. Huser and Ms. Bremer.	4900	1.00	\$250.00
08/08/23	SH	Tracing TIEP investor interest payments	4900	1.60	\$400.00
08/08/23	TC	Call with Ms. Menchaca to discuss new request for disbursement data relating to Heartland investors.	4900	0.30	\$75.00
08/09/23	SH	Tracing of TIEP investor interest payments	4900	4.00	\$1,000.00
08/10/23	SH	Tracing TIEP investor interest payments	4900	1.50	\$375.00
08/10/23	CB	Review of TIEP investor rollovers to validate HL interest paid and source of funds	4900	1.90	\$617.50
08/11/23	CB	Review of TIEP investor rollovers to validate HL interest paid and source of funds	4900	0.80	\$260.00
08/11/23	SH	Tracing TIEP investor interest payments	4900	4.50	\$1,125.00
08/11/23	JB	Review of TIEP investor rollovers to validate HL interest paid and source of funds	4900	6.50	\$780.00
08/13/23	CB	Review of TIEP investor rollovers to validate HL interest paid and source of funds	4900	1.70	\$552.50
08/14/23	CB	Review of TIEP investor rollovers to validate HL interest paid and source of funds	4900	0.90	\$292.50
08/14/23	JB	Review of TIEP investor rollovers to validate HL interest paid and source of funds	4900	6.00	\$720.00
08/14/23	MA	Review outstanding issues and emails from Dykema	3900	1.00	\$325.00
08/14/23	SH	TIEP investor interest payment tracing	4900	3.00	\$750.00
08/14/23	SH	Correspondence and discussion regarding notices and other open items	2900	0.30	\$75.00
08/15/23	TC	Update Summary TIEP Demand Letter schedule: begin to enter TIEP Rollover interest amounts paid by Heartland entities.	4900	5.50	\$1,375.00
08/15/23	CB	Review of TIEP investor rollovers to validate HL interest paid and source of funds	4900	8.70	\$2,827.50
08/15/23	JB	Review of TIEP investor rollovers to validate HL interest paid and source of funds	4900	9.90	\$1,188.00
08/15/23	SH	Tracing TIEP investor interest payments and building related schedules	4900	4.50	\$1,125.00
08/16/23	CB	Review of TIEP investor rollovers to validate HL interest paid and source of funds. Review of detailed TIEP interest schedules completed by team.	4900	8.40	\$2,730.00
08/16/23	SH	TIEP investor interest payment tracing and building related schedules	4900	8.50	\$2,125.00
08/16/23	TC	Update Summary TIEP Demand Letter schedule based on feedback and clarification from Receiver.	4900	2.30	\$575.00
08/16/23	TC	Discussions with Ms. Bremer regarding TIEP Rollover interest amounts paid by Heartland entities and how to represent new money from TIEP investors for purposes of the Demand Letter schedule.	4900	0.80	\$200.00
08/16/23	JB	Review of TIEP investor rollovers to validate HL interest paid and source of funds.	4900	9.60	\$1,152.00
08/16/23	CB	Developed template of required information for TIEP demand letters.	4900	0.70	\$227.50
08/16/23	CB	Researched and responded to investor related questions on K-1s from Receiver.	4900	0.40	\$130.00
08/16/23	CB	Discussion with Receiver on information for TIEP demand letters.	4900	0.20	\$65.00
08/17/23	TC	Complete data entry for Summary TIEP Demand Letter schedule and send to Receiver.	4900	6.60	\$1,650.00

Date	ID	Description	Task	Hours	Amount
08/17/23	SH	Research and response for K-1 questions; balance sheet questions	2900	1.00	\$250.00
08/17/23	TC	Discussions with Ms. Huser and Ms. Bremer on data/format for TIEP demand schedules	4900	0.50	\$125.00
08/17/23	CB	Review of detailed TIEP interest schedules completed by team and TIEP totals for demand amounts.	4900	4.30	\$1,397.50
08/17/23	CB	Discussions with Ms. Huser and Mr. Cecil on data/format for TIEP demand schedules	4900	0.50	\$162.50
08/18/23	TC	Prepare detailed examples of TIEP Principal balance calculations used in Demand Letter schedule to illustrate to the Receiver how Principal balances were calculated.	4900	3.60	\$900.00
08/18/23	TC	Call with Ms. Behrends, Ms. Williamson, and Ms. Bremer to discuss TIEP schedule for demand letters.	4900	0.50	\$125.00
08/18/23	CB	Reviewed examples of Net TIEP principal balances for receiver call and edit (24 minutes). Call with Ms. Behrends, Ms. Williamson, and Mr. Cecil to discuss TIEP schedule for demand letters. (30 minutes). Review of Fund III balance sheet (18 minutes).	4900	1.20	\$390.00
08/18/23	SH	Review and correspondence regarding balance sheet details	2900	0.30	\$75.00
08/21/23	SH	Balance sheets - additional reporting for insolvency analysis	2900	0.50	\$125.00
08/21/23	TC	Review insolvency situation for Heartland entities PAR and Fund III by reviewing balance sheets and cash flow for Heartland entities.	4900	3.80	\$950.00
08/21/23	CB	Review of HL Fund III and HL Production and Recovery balance sheets related to insolvency.	4900	0.60	\$195.00
08/22/23	TC	Prepare summary schedule of Heartland investors for claims processing, summarizing funds received from investors, funds returned to investors and interest paid to investors.	4900	6.90	\$1,725.00
08/22/23	SH	Reporting for insolvency testing	2900	0.50	\$125.00
08/22/23	CB	Review of analysis of solvency for HL Fund III and HL Production and Recovery. Drafting of solvency tests to support analysis.	4900	2.30	\$747.50
08/23/23	CB	Call with Mr. Cecil to discuss investor information required for claims processing per his call with Ms. Williamson and Ms. Behrends (36 minutes). Review list of additional requests (18 minutes).	4900	0.90	\$292.50
08/23/23	TC	Call with Receiver to discuss the claims filing process and the investor information required.	4900	1.40	\$350.00
08/23/23	TC	Begin to update summary claims schedule based on call with Receiver.	4900	1.30	\$325.00
08/23/23	TC	Call with Ms. Bremer to discuss the investor information required for claims processing.	4900	0.60	\$150.00
08/24/23	CB	Began draft of notes/questions on distribution plan for discussion with receiver.	4900	0.60	\$195.00
08/24/23	MA	Call with Ms. Behrends and the IRS	3900	0.30	\$97.50
08/24/23	SH	Call with Ms. Behrends, Ms. Menchaca, Ms. Bremer, and Mr. Cecil to discuss files requested related to litigation	2900	0.40	\$100.00
08/24/23	SH	Call with Ms. Behrends and Ms. Reinhart to discuss documents/files	2900	0.20	\$50.00
08/24/23	CB	Call with Ms. Behrends, Ms. Huser, Mr. Cecil. and Ms. Menchaca to discuss files requested related to litigation.	4900	0.40	\$130.00
08/24/23	TC	Call with Ms. Menchaca, Ms. Rushing and A&C team to discuss bank schedules prepared by A&C.	4900	0.40	\$100.00
08/25/23	MA	Update meeting with Ms. Williamson, Ms. Behrends, Ms. Huser, Mr. Cecil, and Ms. Bremer	3900	1.00	\$325.00
08/25/23	SH	Update meeting with Ms. Williamson, Ms. Behrends, Ms. Ahuja, Mr. Cecil, and Ms. Bremer	2900	1.00	\$250.00

Date	ID	Description	Task	Hours	Amount
08/25/23	CB	Pull listing of converted bank files to send to Receiver (18 minutes). Pulling together summary and questions on distribution plan (1hr 24 minutes).	4900	1.70	\$552.50
08/25/23	CB	Update call with Ms. Behrends, Ms. Williamson, Ms. Ahuja, Mr. Cecil, and Ms. Huser.	4900	1.00	\$325.00
08/25/23	TC	Update call with Ms. Behrends, Ms. Williamson, Ms. Ahuja, Ms. Bremer, and Ms. Huser.	4900	1.00	\$250.00
08/28/23	SH	QuickBooks listing and related correspondence; meeting preparation	2900	0.50	\$125.00
08/28/23	SH	Meeting with Ms. Behrends, Mr. Cohan, and Ms. Menchaca to discuss QuickBooks file production and related data	2900	0.70	\$175.00
08/31/23	JB	Extract monthly balance sheet for multiple years for Heartland Group Fund III and Heartland Production and Recovery Fund.	4900	0.75	\$90.00
09/05/23	SH	Calculations and preparation of diesel fuel tax reports	2900	1.00	\$250.00
09/05/23	SH	Research and correspondence regarding access to Intuit payroll accounts for AOS and Heartland Group Ventures	2900	0.50	\$125.00
09/05/23	DS	Update the tax return for business usage of aircraft for 2020 & 2021	3900	1.00	\$250.00
09/05/23	MA	Call with Ms. Behrends, Ms. Williamson, and Ms. Huser to discuss open items	3900	0.50	\$162.50
09/05/23	TC	Continue to develop summary schedule of net investor claim balances; reconcile summary schedule to Master investor schedule.	4900	4.00	\$1,000.00
09/05/23	SH	Call with Ms. Behrends, Ms. Williamson, and Ms. Ahuja to discuss open items	2900	0.50	\$125.00
09/05/23	TC	Meeting with Ms. Williamson, Ms. Behrends, Ms. Bremer, and Stretto team to discuss Heartland claims process.	4900	0.90	\$225.00
09/05/23	CB	Meeting with Ms. Williamson, Ms. Behrends, Mr. Cecil, and Stretto team to discuss Heartland claims process.	4900	0.90	\$292.50
09/06/23	TC	Perform investor research to add information to the Master and summary investor schedules; break out investors within the Alpha Energy Fund I feeder fund investments.	4900	7.40	\$1,850.00
09/06/23	DS	Update revised depreciation for revised business usage of aircraft	3900	0.90	\$225.00
09/06/23	SH	Barron Petroleum LLC - update penalty and interest calculations and diesel fuel tax returns; prepare waiver requests. Review QuickBooks data files for relevant identifying information to request payroll account information from Intuit for AOS and The Heartland Group Ventures	2900	2.50	\$625.00
09/07/23	DS	Review prior years and update 2022 tax return for updated depreciation amounts and correct business usage %	3900	1.00	\$250.00
09/07/23	TC	Gather investor stats for Motion to be filed by Receiver; continue to update Master investor schedule and summary schedule for claims processing.	4900	7.20	\$1,800.00
09/07/23	SH	Confirmation of QuickBooks data files requested by attorney; provide data files; related correspondence	2900	1.50	\$375.00
09/07/23	CB	Performed solvency test by month for HL Fund III	4900	0.40	\$130.00
09/08/23	TC	Complete reconciliation of summary net investor schedule to Master investor schedule based on updates made to Master schedule; add new money from initial TIEP investors to summary and Master investor schedules.	4900	2.80	\$700.00
09/08/23	SH	QuickBooks data file upload and related correspondence	2900	0.20	\$50.00
09/10/23	DS	Update the work paper & tax return to exclude the 2020 depreciation	3900	0.80	\$200.00
09/11/23	CB	Verify new money interest for TIEP investors	4900	0.30	\$97.50
09/11/23	DS	Review the calculation with Ms. Ahuja and upload the return	3900	2.50	\$625.00
09/12/23	DS	Compare the amended return with prior return & download the return	3900	0.50	\$125.00

Date	ID	Description	Task	Hours	Amount
09/12/23	SH	Disclosure review	3900	0.20	\$50.00
09/12/23	MA	Meeting with Ms. Williamson, Ms. Behrends, and Ms. Huser to discuss updated tax filing information	3900	0.30	\$97.50
09/12/23	TC	Develop a list of assumptions used by A&C to calculate investor claim balances; complete reconciliation between summary and master investor schedules based on investor updates; investor schedules to be used for investor claims processing.	4900	3.50	\$875.00
09/12/23	SH	Meeting with Ms. Williamson, Ms. Behrends, and Ms. Ahuja to discuss updated tax filing information	2900	0.30	\$75.00
09/12/23	CB	Revised assumptions related to investor claim information	4900	0.50	\$162.50
09/13/23	MA	Review of 2022 amendment for Dallas Resources. Call with Receiver to review return (24min)	3900	2.00	\$650.00
09/13/23	TC	Perform investor research to determine how to record certain investments for claims processing purposes.	4900	3.10	\$775.00
09/13/23	DS	Download tax return and transmittal letter to send to client	3900	0.30	\$75.00
09/13/23	DP	Sending client copy of Draft return along with invoice and required signature forms: 2022 Amended - Dallas Resources	3900	0.40	\$38.00
09/14/23	SH	Dallas Resources penalty and interest forms review and correspondence; review and preparation of revised Barron Petroleum LLC 2022 Profit and Loss statement, related discussions	2900	1.30	\$325.00
09/14/23	CB	Discussion with Ms. Williamson, Ms. Behrends, and Mr. Cecil regarding assumptions used for calculating investor balances for claims processing	4900	0.90	\$292.50
09/14/23	TC	Perform research to determine if funds were received from investors where investments showed a Funds Received date in the Heartland portal, but the status of the investment showed "Waiting on Documents," "Waiting on Verification," etc.	4900	3.90	\$975.00
09/14/23	DS	Update QuickBooks file to move the expense from Barron Petroleum to Dallas Resources, Inc. Resources	3900	0.80	\$200.00
09/14/23	TC	Discussion with Ms. Williamson, Ms. Behrends, and Ms. Bremer regarding assumptions used for calculating investor balances for claims processing	4900	0.90	\$225.00
09/15/23	DS	Issue with e-filing the tax return - Call CC for accurate transmission of tax return	3900	1.00	\$250.00
09/15/23	SH	Review wire and tax information, related discussions, and correspondence	2900	1.00	\$250.00
09/18/23	TC	Resolve open items on Master Investor schedule; reconcile Master investor schedule to Summary schedule based on changes to the Master schedule; perform research to determine the number of advisors that had Heartland investments as requested by Receiver.	4900	5.80	\$1,450.00
09/18/23	SH	Ongoing monthly accounting	2900	3.00	\$750.00
09/19/23	SH	Update call with Ms. Behrends and Ms. Bremer	2900	0.50	\$125.00
09/19/23	TC	Update Master investor schedule based on research performed; remove information not required for claims processing on data file to be sent to Stretto.	4900	3.40	\$850.00
09/19/23	CB	Update call with Ms. Behrends and Ms. Huser to discuss requests.	4900	0.50	\$162.50
09/19/23	CB	Review of investor file for Stretto and discussion with Mr. Cecil regarding files.	4900	0.40	\$130.00
09/20/23	CB	Revised master investor file into format for Stretto template. Noted questions on formatting for certain investment situations for further discussion with Ms. Behrends.	4900	1.60	\$520.00
09/20/23	CB	Call with Ms. Behrends and Mr. Ceil regarding the format of the Master Investor data file to be sent to Stretto for claims processing.	4900	0.80	\$260.00
09/20/23	CB	Reviewed Claims Motion from Ms. Behrends	4900	0.60	\$195.00

Date	ID	Description	Task	Hours	Amount
09/20/23	TC	Call with Ms. Behrends and Ms. Bremer regarding the format of the Master Investor data file to be sent to Stretto for claims processing.	4900	0.80	\$200.00
09/20/23	SH	Review tax documents and related correspondence	2900	0.50	\$125.00
09/21/23	TC	Update Master Investor file based on call with Ms. Behrends; Perform investor research requested by the Receiver to determine if investors submitted funds to Heartland entities.	4900	5.00	\$1,250.00
09/22/23	TC	Perform Quality Control analysis on data included in the Master Investor schedule to verify investment amounts (funds received) are accurate.	4900	5.90	\$1,475.00
09/25/23	TC	Prepare example of transaction schedule of a net winner; separate investors from feeder fund for claims processing purposes; add subtotals for funds received and funds returned columns; QC and reconcile subtotals added to Master Investor schedule; reconcile Master data file to Summary control schedule.	4900	9.60	\$2,400.00
09/25/23	CB	Call with Mr. Cecil, Ms. Behrends, and Stretto to discuss questions on files for investor claims (60 minutes). Call with Mr. Cecil to discuss questions on investor file (42 minutes). Review of investor file, comments on edits to file, and drafting questions to discuss with Ms. Behrends. (192 minutes).	4900	4.90	\$1,592.50
09/25/23	TC	Call with Ms. Behrends, Ms. Bremer, and Stretto team to discuss format of information to be provided by A&C for claims processing transaction schedules.	4900	1.00	\$250.00
09/25/23	TC	Call with Ms. Bremer to discuss updates needed for investor data file to be sent to Stretto.	4900	0.70	\$175.00
09/26/23	SH	Pulling investor K-1s for historical information regarding investment amounts	4900	0.30	\$75.00
09/26/23	CB	Reviewed investor file for Stretto (78 minutes). Discussion with Ms. Behrends and Mr. Cecil on questions related to investor file (60 minutes).	4900	2.30	\$747.50
09/26/23	TC	Complete QC analysis of Master Investor data file.	4900	1.10	\$275.00
09/26/23	TC	Call with Ms. Behrends and Ms. Bremer regarding how to handle the investors with multiple names for transaction schedules.	4900	1.00	\$250.00
09/27/23	CB	Final review of investor file detail for Stretto. Drafting instructions for Stretto.	4900	4.40	\$1,430.00
09/27/23	TC	Complete final adjustments and review of Master Investor data file to be sent to Stretto for claims processing; sent Master Investor data file to Stretto.	4900	3.50	\$875.00
09/27/23	SH	Review of QuickBooks and bank entries for investor balances; related discussions with Ms. Bremer	4900	1.20	\$300.00
09/27/23	SH	Verify, update, and send Barron Petroleum 2022 P&L for distribution	2900	0.30	\$75.00
09/28/23	CB	Call with Mr. Cecil. Ms. Behrends and Stretto team to discuss use of investor file for claims letters.	4900	0.90	\$292.50
09/28/23	TC	Update workpapers documenting recent investor research and analysis used to finalize Master Investor schedule and data file provided to Stretto.	4900	2.80	\$700.00
09/28/23	TC	Call with Ms. Behrends, Ms. Bremer, and Stretto team to discuss and review Master Investor data file provided by A&C to Stretto.	4900	0.90	\$225.00
Total					\$128,508.00
Balance Due					\$128,508.00

NOTE: Total Fees are net of write off fees of \$7,138.50 for review of notices and internal discussions



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

Ahuja & Clark, PLLC

2901 N. Dallas Pkwy
 Suite 320
 Plano, TX 75093

Invoice # 8229.HL
Invoice Date: 9/30/2023
Due Date: 10/31/2023

Bill To:
 Dykema
 Attn: Deborah Williamson

BILLING SUMMARY

ID	TIMEKEEPER	TITLE	HOURS	RATE	AMOUNT
CB	Carolyn Bremer	Engagement Leader	121.90	\$325.00	\$39,617.50
DP	Dawn Peterson	Associate	0.40	\$95.00	\$38.00
DS	Divya Shetty	CPA	28.45	\$250.00	\$7,112.50
JB	Jeanne-Marie Blevins	Associate	32.75	\$120.00	\$3,930.00
LD	Linu Dayaran Kandy	Senior Associate	3.00	\$180.00	\$540.00
MA	Madhu Ahuja	Engagement Leader	30.60	\$325.00	\$9,945.00
SH	Stacey Huser	Manager	107.20	\$250.00	\$26,800.00
TC	Tony Cecil	CPA/CFE	162.10	\$250.00	\$40,525.00

TOTAL **486.40** **\$128,508.00**



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2901 N. Dallas Pkwy
Suite 320
Plano, TX 75093

Invoice # 8229.HL

Invoice Date: 9/30/2023

Due Date: 10/31/2023

Bill To:
Dykema
Attn: Deborah Williamson

TASK SUMMARY

TASK	TASK DESCRIPTION	HOURS	AMOUNT
2900	Accounting/Auditing	55.40	\$13,850.00
3900	Tax Issues	62.65	\$17,685.50
4900	Forensic Accounting	368.35	\$96,972.50

TOTAL	486.40	\$128,508.00
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Ahuja & Clark, PLLC
Certified Public Accountants
Tax & Accounting • Business Valuation • Business Interruption • Forensic Accounting

Ahuja & Clark, PLLC

2901 N. Dallas Pkwy
Suite 320
Plano, TX 75093

Invoice # 8229.HL

Invoice Date: 9/30/2023

Due Date: 10/31/2023

Bill To:
Dykema
Attn: Deborah Williamson

Expense Reimbursement

DATE	DESCRIPTION	QUANTITY	RATE	AMOUNT
9/15/2023	Certified Mail – Form 3115 – Dallas Resources	1	\$8.71	\$8.71

TOTAL

\$8.71

EXHIBIT E-6



410 Exchange, Ste 100
Irvine, CA 92602
855.812.6112

Invoice: 8739
Date: 08/02/2023
Due Date: 09/01/2023
Terms: Net 30

Bill To:
Heartland

Item	Quantity	Unit Price	Amount
July 23 Invoice			
Hourly Fees			\$1,319.50
TOTAL DUE			\$1,319.50

THANK YOU.

For wire/ACH payments:

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

Remit Check Payments to:

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



Case Name: Heartland

Summary of Hourly Fees

Date Range: 07/01/2023 - 07/31/2023

Role	Hours	Rate	Total
Associate	1.5	\$130.00	\$195.00
Director II	2.9	\$185.00	\$536.50
Director III	1.4	\$195.00	\$273.00
Managing Director	1.5	\$210.00	\$315.00
		Total	\$1,319.50



Case Name: Heartland

Time Detail

Date Range: 07/01/2023 - 07/31/2023

Date	Employee Name	Role	Task	Description	Hours
07/11/2023	Dan McElhinney	Managing Director	Case Administration	Prep for and attend kick-off call with Receiver and counsel re claim process (.3)	0.3
07/11/2023	Kevin Wasserman	Associate	Case Administration	Kick-off call with receiver and counsel.	0.5
Subtotal 07/11/2023					0.8
Date	Employee Name	Role	Task	Description	Hours
07/12/2023	Alexa Westmoreland	Director	Case Administration	Correspondence with D. Ramirez re: upcoming claim form details	0.2
07/12/2023	Daniel Ramirez	Associate	Case Administration	Internal correspondence regarding claims form options, pricing,	0.2
07/12/2023	Nicholas Kennedy	Director	Case Administration	Research, communications re: work product doctrine	1.4
07/12/2023	Robert Saraceni	Director	Case Administration	Begin research requested by client for samples of interim distribution motions. Download Kinetic, Legisi, McClintock, Founding Partners and Jay Peake Motions.	0.6
07/12/2023	Robert Saraceni	Director	Case Administration	Continue research for claims process instructions and letters to potential claimants and download.	0.5
07/12/2023	Robert Saraceni	Director	Case Administration	Continue research for sample POC forms and download.	0.3
07/12/2023	Robert Saraceni	Director	Case Administration	Complete research on sample bar date motions and download.	0.5
Subtotal 07/12/2023					3.7
Date	Employee Name	Role	Task	Description	Hours
07/13/2023	Dan McElhinney	Managing Director	Case Administration	Research and cons. GC re security / conf. issues relating to data provided to Stretto (.5); cons. team re deliverables from kick-off call (.2)	0.7
07/13/2023	Dan McElhinney	Managing Director	Case Administration	Cons. team re info needed to respond to Dykema fee app request (.1); prep and revise bios (.2)	0.3
07/13/2023	Daniel Ramirez	Associate	Case Administration	Internal correspondence regarding claims form options, pricing,	0.2
07/13/2023	Stephen Cady	Director	Case Administration	Coordinate preparation of fee application data	0.2
Subtotal 07/13/2023					1.4
Date	Employee Name	Role	Task	Description	Hours
07/14/2023	Daniel Ramirez	Associate	Case Administration	Internal correspondence regarding claims form options, pricing,	0.6
Subtotal 07/14/2023					0.6

Date	Employee Name	Role	Task	Description	Hours
07/18/2023	Robert Saraceni	Director	Case Administration	Attention to review and preparation of supporting documents for Q2 2023 fee application	0.3
Subtotal 07/18/2023					0.3
Date	Employee Name	Role	Task	Description	Hours
07/19/2023	Dan McElhinney	Managing Director	Case Administration	Cons. team and prep email to D. Williamson (Receiver) and D. Behrends (Dykema) re cost of development of claim portal (.2)	0.2
07/19/2023	Robert Saraceni	Director	Case Administration	Corr. internally fee Q2 2023 fee application documents.	0.1
Subtotal 07/19/2023					0.3
Date	Employee Name	Role	Task	Description	Hours
07/20/2023	Robert Saraceni	Director	Case Administration	Corr. with counsel re website review and comment and draft first day motions.	0.1
Subtotal 07/20/2023					0.1
Date	Employee Name	Role	Task	Description	Hours
07/26/2023	Robert Saraceni	Director	Case Administration	Review and respond to internal email regarding deadline for sending supporting documentation for Q2 2023 Receiver fee application.	0.1
Subtotal 07/26/2023					0.1
Total 07/01/2023 - 07/31/2023					7.3



410 Exchange, Ste 100
Irvine, CA 92602
855.812.6112

Invoice: 8987
Date: 09/02/2023
Due Date: 10/02/2023
Terms: Net 30

Bill To:
Heartland

Item	Quantity	Unit Price	Amount
August 23 Invoice			
Hourly Fees			\$1,678.50

TOTAL DUE	\$1,678.50
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THANK YOU.

For wire/ACH payments:

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

Remit Check Payments to:

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



Case Name: Heartland

Summary of Hourly Fees

Date Range: 08/01/2023 - 08/31/2023

Role	Hours	Rate	Total
Associate	1.3	\$130.00	\$169.00
Director	0.7	\$185.00	\$129.50
Managing Director	6.1	\$210.00	\$1,281.00
Senior Associate	0.6	\$165.00	\$99.00
		Total	\$1,678.50



Case Name: Heartland

Time Detail

Date Range: 08/01/2023 - 08/31/2023

Date	Employee Name	Role	Task	Description	Hours
08/04/2023	Stephen Cady	Director	Case Administration	Correspondence with Stretto team re: sample claims process documentation; gather same	0.2

Subtotal 08/04/2023 0.2

Date	Employee Name	Role	Task	Description	Hours
08/17/2023	Dan McElhinney	Managing Director	Claims Administration and Objections	Prep response to D. Berhends re claims process (.3); cons. with B. Saraceni re same (.1)	0.4

08/17/2023	Dan McElhinney	Managing Director	Case Administration	Attend call with D. Berhends re comments to proof of claim forms (.5); cons. B. Saraceni and K. Wasserman in follo-up call re next steps (.2)	0.7
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08/17/2023	Daniel Ramirez	Associate	Case Administration	Heartland Regroup Call with client	0.6
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Subtotal 08/17/2023 1.7

Date	Employee Name	Role	Task	Description	Hours
08/18/2023	Dan McElhinney	Managing Director	Claims Administration and Objections	Prep, review and revise Investor and Creditor POC forms (1.8); cons. with K. Wasserman re same (.1)	1.9

08/18/2023	Dan McElhinney	Managing Director	Claims Administration and Objections	Draft, review and revise creditor POC form (.8)	0.8
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Subtotal 08/18/2023 2.7

Date	Employee Name	Role	Task	Description	Hours
08/24/2023	Dan McElhinney	Managing Director	Claims Administration and Objections	Draft, review and revise POC and Notices for investor and vendor claims (2.0); draft, review and revise Publication Notice re bar date (.3)	2.3

08/24/2023	Daniel Ramirez	Associate	Case Administration	Review Draft Notices and POC	0.3
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Subtotal 08/24/2023 2.6

Date	Employee Name	Role	Task	Description	Hours
08/30/2023	Alexa Westmoreland	Director	Case Administration	Review creditor and investor claim forms; correspondence with case team re: electronic portals for each	0.5

08/30/2023	IT Staff	Senior Associate	Case Administration	Heartland - Estimate Scoping	0.3
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08/30/2023	Kevin Wasserman	Associate	Case Administration	Coordinating internally to get cost estimates for claim forms.	0.4
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Subtotal 08/30/2023 1.2

Date	Employee Name	Role	Task	Description	Hours
08/31/2023	IT Staff	Senior Associate	Case Administration	Heartland - Estimate Scoping	0.3
Subtotal 08/31/2023					0.3
Total 08/01/2023 - 08/31/2023					8.7



410 Exchange, Ste 100
 Irvine, CA 92602
 855.812.6112

Invoice: 9259
Date: 10/02/2023
Due Date: 11/02/2023
Terms: Net 30

Bill To:
 Heartland

Item	Quantity	Unit Price	Amount
September 23 Invoice			
Hourly Fees			\$17,263.25
Printing	55,183	\$0.10	\$5,518.30
Postage			\$2,942.97
Envelopes and Packaging – See Noticing Summary for details			\$212.25
Robotic Process Automation - Includes ECF docket automation, subscription-based docket notifications, USPS bulk mail operations, address validation, e-filing transactions, cloud computing charges, and related activities			\$1,394.20
TOTAL DUE			\$27,330.97

THANK YOU.

For wire/ACH payments:

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

Remit Check Payments to:

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



Case Name: Heartland

Summary of Hourly Fees

Date Range: 09/01/2023 - 09/30/2023

Role	Hours	Rate	Total
Analyst I	2.1	\$30.00	\$63.00
Analyst II	0.5	\$40.00	\$20.00
Associate I	5.3	\$65.00	\$344.50
Associate II	6.9	\$97.50	\$672.75
Associate III	14.5	\$130.00	\$1,885.00
Director I	1.8	\$175.00	\$315.00
Director II	30.8	\$185.00	\$5,698.00
Managing Director	12.7	\$210.00	\$2,667.00
Senior Associate I	0.4	\$135.00	\$54.00
Senior Associate III	33.6	\$165.00	\$5,544.00
		Total	\$17,263.25



Case Name: Heartland

Time Detail

Date Range: 09/01/2023 - 09/30/2023

Date	Employee Name	Role	Task	Description	Hours
09/05/2023	Dan McElhinney	Managing Director	Claims Administration and Objections	Prep for and attend call re claims forms and process (1.5); follow-up call with team re deliverables (.2)	1.7
09/05/2023	IT Staff	Senior Associate	Claims Administration and Objections	Attention to reviewing system needs and requirements in order to estimate custom build for investor creditor claim form	2.8
09/05/2023	Kevin Wasserman	Associate	Case Administration	Coordination and compliance activities, including preparation of reports to the court, investor inquiries, etc.	1.0
09/05/2023	Robert Saraceni	Director	Case Administration	TC with Receiver and team re case status.	1.0
09/05/2023	Robert Saraceni	Director	Case Administration	Review and format non-investor creditor matrix address list, research and update all missing addresses and review list for possible missing regulatory agencies.	3.8
09/05/2023	Sheryl Betance	Managing Director	Case Administration	Senior management oversight of case activity including team correspondence, filed documents and client requests; check-in with case team	0.4
Subtotal 09/05/2023					10.7
Date	Employee Name	Role	Task	Description	Hours
09/06/2023	Alexa Westmoreland	Director	Claims Administration and Objections	Review proofs of claim and electronic claim portal details; circulate same to case team	0.4
09/06/2023	Dan McElhinney	Managing Director	Claims Administration and Objections	Draft, review and revise claim forms and notices for investor and non-investor claims (2.1); prep and send email with updated versions to Dykema (.1)	2.2
09/06/2023	Dan McElhinney	Managing Director	Claims Administration and Objections	Cons. A. Westmoreland re efilng portal dev. (.2); prep email to D. Behrends re cost and time-line re efilng portal development (.1)	0.3
09/06/2023	Robert Saraceni	Director	Case Administration	Add individual defendant and relief defendant contact information to Non-Investor Creditor Matrix and reformat file. Add additional addresses for EPA (.7). Research Pre-Receiver'ship invoice file supplied by counsel and confirm and update matrix list. (.9)	1.6
09/06/2023	Sheryl Betance	Managing Director	Case Administration	Senior management oversight of case activity including team correspondence, filed documents and client requests; check-in with case team	0.2
Subtotal 09/06/2023					4.7
Date	Employee Name	Role	Task	Description	Hours
09/07/2023	Alexa Westmoreland	Director	Claims Administration and Objections	Correspondence with case team re: electronic claim portal options and features	0.2
09/07/2023	Dan McElhinney	Managing Director	Claims Administration and Objections	Review finalized claim forms and notices (.2); email D. Ramirez re same (.1); follow-up email to A. Westmoreland re claim form development process (.1)	0.4

Date	Employee Name	Role	Task	Description	Hours
09/07/2023	Daniel Ramirez	Associate	Claims Administration and Objections	Draft Claim Forms & Notices with inclusion of website and email addresses/hyperlinks	0.2
09/07/2023	Robert Saraceni	Director	Case Administration	Begin review and formatting of Investor Matrix (.5); Add additional address to Non-Investor Creditor Matrix (.1); Corr with Receiver's office re status of Non-Investor Creditor Matrix (.1); Begin review and entry of 1099 files for addition to Non-Investor Creditor Matrix (.4)	1.1
09/07/2023	Robert Saraceni	Director	Case Administration	Add additional addresses to Non-Investor Creditor Matrix from Barron - 1099 NEC List for 2021	1.3
09/07/2023	Robert Saraceni	Director	Case Administration	Add additional addresses for Barron 2020 W2 List and Arco 2020 W2 List	1.2
09/07/2023	Robert Saraceni	Director	Case Administration	Review docket for NOA's and add to Non-Investor creditor matrix, add additional attorney addresses as directed	0.8
09/07/2023	Sheryl Betance	Managing Director	Case Administration	Senior management oversight of case activity including team correspondence, filed documents and client requests; check-in with case team	0.2
Subtotal 09/07/2023					5.4

Date	Employee Name	Role	Task	Description	Hours
09/08/2023	Alexa Westmoreland	Director	Claims Administration and Objections	Coordinate electronic proof of claim portal and related details	0.3
09/08/2023	Dan McElhinney	Managing Director	Claims Administration and Objections	Respond to A. Westmoreland questions re Heartland POC development (.4)	0.4
09/08/2023	Robert Saraceni	Director	Case Administration	Add additional addresses to Non-Investor Creditor Matrix per Barron 2021 W2 Report supplied by Vicki Palmour Consulting	2.4
09/08/2023	Robert Saraceni	Director	Case Administration	De-dupe Non-Investor Creditor Matrix and update missing and incorrect zip codes	0.9
09/08/2023	Sheryl Betance	Managing Director	Case Administration	Senior management oversight of case activity including team correspondence, filed documents and client requests; check-in with case team	0.2
Subtotal 09/08/2023					4.2

Date	Employee Name	Role	Task	Description	Hours
09/11/2023	Daniel Ramirez	Associate	Case Administration	Email setup for Heartland Receivership	0.2
09/11/2023	Robert Saraceni	Director	Case Administration	Review and format Investor Matrix file, update zip codes, update address fields, combine name fields, corr. with Receiver re updates to file.	3.3
09/11/2023	Robert Saraceni	Director	Case Administration	Update Non-Investor Creditor Matrix with final address additions per Receiver, corr. with Receiver re missing address records and run final file format.	1.7
09/11/2023	Sheryl Betance	Managing Director	Case Administration	Senior management oversight of case activity including team correspondence, filed documents and client requests; check-in with case team	0.2
Subtotal 09/11/2023					5.4

Date	Employee Name	Role	Task	Description	Hours
09/12/2023	Alexa Westmoreland	Director	Claims Administration and Objections	Case team discussion regarding electronic claims portal and noticing details	0.5

Date	Employee Name	Role	Task	Description	Hours
09/12/2023	Dan McElhinney	Managing Director	Claims Administration and Objections	Cons. C. Semple, A. Westmoreland & B. Saraceni re proof of claim form (.8); follow-up with B. Saraceni re same and service of claim motion (.1)	0.9
09/12/2023	Daniel Ramirez	Associate	Case Administration	Coordination setting up mailing for Notices/Motions	1.5
09/12/2023	IT Staff	Senior Associate	Claims Administration and Objections	Initial kickoff to create investor creditor claim form	0.8
09/12/2023	Kevin Wasserman	Associate	Case Administration	Coordination and compliance activities, including preparation of reports to the court, investor inquiries, etc.	0.6
09/12/2023	Robert Saraceni	Director	Claims Administration and Objections	TC with development to discuss additional data needed for claims portal.	0.5
09/12/2023	Robert Saraceni	Director	Case Administration	Prepare Non-Investor Mailing File for service of Claims Motion and Notice	0.6
09/12/2023	Robert Saraceni	Director	Case Administration	Prepare Non-Investor Mailing File for service of Claims Motion and Notice	0.6
09/12/2023	Robert Saraceni	Director	Case Administration	Prepare Investor Mailing File for service of Claims Motion and Notice	1.3
09/12/2023	Sheryl Betance	Managing Director	Case Administration	Senior management oversight of case activity including team correspondence, filed documents and client requests; check-in with case team	0.3
Subtotal 09/12/2023					7.6

Date	Employee Name	Role	Task	Description	Hours
09/13/2023	Aimee Marshall	Associate	Case Administration	Generate service of Motion Mailing for Heartland mailing including printing and fulfillment	0.1
09/13/2023	Alberto Chachagua	Associate	Case Administration	Generate service of Motion Mailing for Heartland mailing including printing and fulfillment	2.8
09/13/2023	Antonio Rubio	Associate	Case Administration	Generate service of Motion Mailing for Heartland mailing including printing and fulfillment	0.8
09/13/2023	Charles Wheeler	Associate	Case Administration	Generate service of Motion Mailing for Heartland mailing including printing and fulfillment	1.0
09/13/2023	David Bribiesca	Associate	Case Administration	Generate service of Motion Mailing for Heartland mailing including printing and fulfillment	3.5
09/13/2023	Jacob Ingram	Associate	Case Administration	Generate service of Motion Mailing for Heartland mailing including printing and fulfillment	2.0
09/13/2023	Kevin Wasserman	Associate	Case Administration	Coordination and compliance activities, including preparation of reports to the court, investor inquiries, etc.	3.1
09/13/2023	Melissa Membrino	Director	Case Administration	Coordinate service of Motion Mailing for Heartland mailing including printing and fulfillment	1.8
09/13/2023	Ricky Quang	Associate	Case Administration	Generate service of Motion Mailing for Heartland mailing including printing and fulfillment	2.0
09/13/2023	Robert Saraceni	Director	Case Administration	Prepare exhibits for COS	0.4
09/13/2023	Sheryl Betance	Managing Director	Case Administration	Facilitate service of Motion Mailing for Heartland mailing	0.7
09/13/2023	Sheryl Betance	Managing Director	Case Administration	Senior management oversight of case activity including team correspondence, filed documents and client requests; check-in with case team	0.6
Subtotal 09/13/2023					18.8

Date	Employee Name	Role	Task	Description	Hours
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Date	Employee Name	Role	Task	Description	Hours
09/14/2023	Charles Wheeler	Associate	Case Administration	Administrative review of mailing details	0.1
09/14/2023	Daniel Ramirez	Associate	Case Administration	Corr. re Notices/Motions	0.1
09/14/2023	Daniel Ramirez	Associate	Case Administration	Creation/revisions of COS	0.4
09/14/2023	Sheryl Betance	Managing Director	Case Administration	Senior management oversight of case activity including team correspondence, filed documents and client requests; check-in with case team	0.1
Subtotal 09/14/2023					0.7

Date	Employee Name	Role	Task	Description	Hours
09/15/2023	Aimee Marshall	Associate	Case Administration	Generate service of Motion Mailing for Heartland – Additional Packages mailing including printing and fulfillment	0.1
09/15/2023	Daniel Ramirez	Associate	Case Administration	Corr. re one-off Notices/Motions	0.1
09/15/2023	Robert Saraceni	Director	Case Administration	Corr with team regarding supplemental service of claims motion to Kuebler, Goulet and Newcomb.	0.1
09/15/2023	Robert Saraceni	Director	Case Administration	Create supplemental mailing file and forward to team.	0.2
09/15/2023	Robert Saraceni	Director	Case Administration	Corr. with D. Behrends re Kuebler address update	0.1
09/15/2023	Robert Saraceni	Director	Case Administration	Review exhibits to 9.13.2023 COS and identify additional names to be redacted from Non-Investor Creditor first class mail and email list (.8); Corr. with D. Behrends re same	0.9
09/15/2023	Sheryl Betance	Managing Director	Case Administration	Senior management oversight of case activity including team correspondence, filed documents and client requests; check-in with case team	0.1
Subtotal 09/15/2023					1.6

Date	Employee Name	Role	Task	Description	Hours
09/18/2023	Alberto Chachagua	Associate	Case Administration	Generate service of Motion Mailing for Heartland – Additional Package mailing including printing and fulfillment	0.2
09/18/2023	Charles Wheeler	Associate	Case Administration	Administrative review of mailing details	0.1
09/18/2023	Daniel Ramirez	Associate	Case Administration	Corr. re one-off Notices/Motions	0.1
09/18/2023	IT Staff	Senior Associate	Claims Administration and Objections	Prepare and build Investor Creditor Claim Form	0.5
09/18/2023	IT Staff	Senior Associate	Claims Administration and Objections	Prepare and build Landing Page	0.5
09/18/2023	IT Staff	Senior Associate	Claims Administration and Objections	Oversee build of investor creditor claim form	1.0
09/18/2023	IT Staff	Senior Associate	Claims Administration and Objections	Prepare and build Investor Creditor Claim Form	4.3
09/18/2023	Kevin Wasserman	Associate	Case Administration	Coordination and compliance activities, including preparation of reports to the court, investor inquiries, etc.	0.1

Date	Employee Name	Role	Task	Description	Hours
09/18/2023	Naomi Rodriguez	Associate	Case Administration	Generate service of Motion Mailing for Heartland – Additional Package mailing including printing and fulfillment	0.1
09/18/2023	Robert Saraceni	Director	Case Administration	Corr. with D. Behrends re supplemental mailing to T. Sterling (Non-Investor Creditor Matrix)	0.1
09/18/2023	Robert Saraceni	Director	Case Administration	Corr. with D. Behrends re Claim portal and response to inquiries re inactive portal.	0.1
09/18/2023	Robert Saraceni	Director	Case Administration	Update Non-Investor Creditor Matrix and Investor Matrix	0.5
09/18/2023	Robert Saraceni	Director	Case Administration	Review Baron Royalty Owners file and PCE Royalty Owners file, format and merge into Non-Investor Creditor Matrix.	3.3
09/18/2023	Sheryl Betance	Managing Director	Case Administration	Senior management oversight of case activity including team correspondence, filed documents and client requests; check-in with case team	0.4
Subtotal 09/18/2023					11.3

Date	Employee Name	Role	Task	Description	Hours
09/19/2023	Charles Wheeler	Associate	Case Administration	Administrative review of mailing details	0.1
09/19/2023	IT Staff	Senior Associate	Claims Administration and Objections	Prepare and build Investor Creditor Claim Form	3.8
09/19/2023	IT Staff	Senior Associate	Claims Administration and Objections	Prepare and build Investor Creditor Claim Form	4.3
09/19/2023	Naomi Rodriguez	Associate	Case Administration	Administrative review of mailing details	0.1
09/19/2023	Sheryl Betance	Managing Director	Case Administration	Senior management oversight of case activity including team correspondence, filed documents and client requests; check-in with case team	0.3
Subtotal 09/19/2023					8.6

Date	Employee Name	Role	Task	Description	Hours
09/20/2023	Jessie De Guzman	Senior Associate	Case Administration	Respond to creditor inquiries via phone re: notice received and contact information	0.4
09/20/2023	Naomi Rodriguez	Associate	Case Administration	Administrative review of mailing details	0.1
09/20/2023	Robert Saraceni	Director	Case Administration	Complete format of Non-Investor Creditor files (PCE, Barron) for merge into Master Matrix. Forward de-duped files to Receiver for review.	0.5
09/20/2023	Sheryl Betance	Managing Director	Case Administration	Senior management oversight of case activity including team correspondence, filed documents and client requests; check-in with case team	0.1
Subtotal 09/20/2023					1.1

Date	Employee Name	Role	Task	Description	Hours
09/21/2023	Aimee Marshall	Associate	Case Administration	Generate service of Motion Mailing for Heartland – Additional Package mailing including printing and fulfillment	0.1
09/21/2023	Alberto Chachagua	Associate	Case Administration	Generate service of Motion Mailing for Heartland – Additional Package mailing including printing and fulfillment	0.2
09/21/2023	Daniel Ramirez	Associate	Case Administration	Set up mailing for one-off 9.21.23	0.3

Date	Employee Name	Role	Task	Description	Hours
09/21/2023	IT Staff	Senior Associate	Claims Administration and Objections	Prepare and build Investor Creditor Claim Form	1.5
09/21/2023	IT Staff	Senior Associate	Claims Administration and Objections	Prepare and build Investor Creditor Claim Form	3.0
09/21/2023	Robert Saraceni	Director	Case Administration	Corr. from D. Behrends, add additional party to Non-Investor Matrix.	0.1
09/21/2023	Sheryl Betance	Managing Director	Case Administration	Senior management oversight of case activity including team correspondence, filed documents and client requests; check-in with case team	0.2
09/21/2023	Stephanie Morales	Analyst	Case Administration	Sort and manage incoming mail re: various mailings	0.1
Subtotal 09/21/2023					5.5

Date	Employee Name	Role	Task	Description	Hours
09/22/2023	Charles Wheeler	Associate	Case Administration	Administrative review of mailing details	0.1
09/22/2023	IT Staff	Senior Associate	Claims Administration and Objections	Prepare and build Investor Creditor Claim Form	2.5
09/22/2023	Robert Saraceni	Director	Case Administration	Update addresses in Investor Matrix as requested and provide team with service list for supplemental service	0.2
09/22/2023	Sheryl Betance	Managing Director	Case Administration	Senior management oversight of case activity including team correspondence, filed documents and client requests; check-in with case team	0.1
09/22/2023	Stephanie Morales	Analyst	Case Administration	Sort and manage incoming mail re: various mailings	0.1
Subtotal 09/22/2023					3.0

Date	Employee Name	Role	Task	Description	Hours
09/25/2023	IT Staff	Senior Associate	Claims Administration and Objections	Prepare and build Investor Creditor Claim Form	1.8
09/25/2023	IT Staff	Senior Associate	Claims Administration and Objections	Prepare and build Non-Investor Creditor Claim Form	2.0
09/25/2023	IT Staff	Senior Associate	Claims Administration and Objections	Quality control review and testing of Investor Creditor Claim Form	2.3
09/25/2023	Kevin Wasserman	Associate	Case Administration	Coordination and compliance activities, including preparation of reports to the court, investor inquiries, etc.	1.0
09/25/2023	Robert Saraceni	Director	Claims Administration and Objections	Remove creditor from Non-Investor Creditor Matrix as requested	0.1
09/25/2023	Sheryl Betance	Managing Director	Case Administration	Senior management oversight of case activity including team correspondence, filed documents and client requests; check-in with case team	0.3
09/25/2023	Stephanie Morales	Analyst	Case Administration	Sort and manage incoming mail re: various mailings	0.1
Subtotal 09/25/2023					7.6

Date	Employee Name	Role	Task	Description	Hours
09/26/2023	Alberto Chachagua	Associate	Case Administration	Generate service of Motion Mailing for Heartland – Additional Package mailing including printing and fulfillment	0.2

Date	Employee Name	Role	Task	Description	Hours
09/26/2023	Dan McElhinney	Managing Director	Claims Administration and Objections	Call with development staff and team re status and open issues re claim portal development (.5)	0.5
09/26/2023	IT Staff	Senior Associate	Claims Administration and Objections	Prepare and build Investor Creditor Claim Form	1.0
09/26/2023	IT Staff	Senior Associate	Claims Administration and Objections	Prepare and build Non-Investor Creditor Claim Form	1.5
09/26/2023	Kevin Wasserman	Associate	Case Administration	Coordination and compliance activities, including preparation of reports to the court, investor inquiries, etc.	1.0
09/26/2023	Kevin Wasserman	Associate	Case Administration	Coordination and compliance activities, including preparation of reports to the court, investor inquiries, etc.	1.6
09/26/2023	Naomi Rodriguez	Associate	Case Administration	Generate service of Motion Mailing for Heartland – Additional Package mailing including printing and fulfillment	0.1
09/26/2023	Naomi Rodriguez	Associate	Case Administration	Administrative review of mailing details	0.1
09/26/2023	Robert Saraceni	Director	Case Administration	Provide exhibits for COS for supplemental service of claims motion from 9.15.2023 through 9.22.2023	0.2
09/26/2023	Robert Saraceni	Director	Case Administration	Corr. with D. Behrends. Provide service list to team for supplemental service of claims motion. Create exhibit for COS.	0.1
09/26/2023	Sheryl Betance	Managing Director	Case Administration	Senior management oversight of case activity including team correspondence, filed documents and client requests; check-in with case team	0.3
09/26/2023	Stephanie Morales	Analyst	Case Administration	Sort and manage incoming mail re: various mailings	0.1
Subtotal 09/26/2023					6.7
Date	Employee Name	Role	Task	Description	Hours
09/27/2023	Charles Wheeler	Associate	Case Administration	Administrative review of mailing details	0.1
09/27/2023	Dan McElhinney	Managing Director	Claims Administration and Objections	Prep, review and revise online claim form process flow document (.5); circulate to team and dev. staff for review (.1)	0.6
09/27/2023	Daniel Ramirez	Associate	Case Administration	Set up mailing for one-off 9.27.23	0.3
09/27/2023	Kevin Wasserman	Associate	Case Administration	Coordination and compliance activities, including preparation of reports to the court, investor inquiries, etc.	0.4
09/27/2023	Robert Saraceni	Director	Case Administration	Review and respond to D. Behrends request for supplemental service of claims motion. Update Investor Matrix for address change. Send address file to team for service.	0.2
09/27/2023	Sheryl Betance	Managing Director	Case Administration	Senior management oversight of case activity including team correspondence, filed documents and client requests; check-in with case team	0.1
09/27/2023	Stephanie Morales	Analyst	Case Administration	Sort and manage incoming mail re: various mailings	0.1
Subtotal 09/27/2023					1.8
Date	Employee Name	Role	Task	Description	Hours
09/28/2023	Charles Wheeler	Associate	Case Administration	Administrative review of mailing details	0.1

Date	Employee Name	Role	Task	Description	Hours
09/28/2023	Dan McElhinney	Managing Director	Claims Administration and Objections	Prep for and attend call re investor list (.7)	0.7
09/28/2023	Pauline Aragon	Analyst	Case Administration	Sort and manage incoming mail re: various mailings	0.1
09/28/2023	Pauline Aragon	Analyst	Case Administration	Coordinate service re: docket no. 4268 per USPS forwarding instructions	2.0
09/28/2023	Sheryl Betance	Managing Director	Case Administration	Senior management oversight of case activity including team correspondence, filed documents and client requests; check-in with case team	0.2
Subtotal 09/28/2023					3.1

Date	Employee Name	Role	Task	Description	Hours
09/29/2023	Kevin Wasserman	Associate	Case Administration	Coordination and compliance activities, including preparation of reports to the court, investor inquiries, etc.	0.6
09/29/2023	Robert Saraceni	Director	Case Administration	Review corr. from D. Behrends regarding origin of Christian Healthcare Ministries on Investor Matrix. Research and advise that Christian Healthcare Ministries was located on Non-Investor Creditor list provided by Dykema.	0.2
Subtotal 09/29/2023					0.8

Total 09/01/2023 - 09/30/2023 108.6



Noticing Detail

Date of Service	Document(s) or Mailing Description	Number of Recipients	Method(s) of Service
9/13/2023	Motion Mailing for Heartland	1,403	First Class Mail
9/15/2023	Motion Mailing for Heartland – Additional Packages	4	First Class Mail
9/18/2023	Motion Mailing for Heartland – Additional Package	2	First Class Mail
9/21/2023	Motion Mailing for Heartland – Additional Package	2	First Class Mail
9/26/2023	Motion Mailing for Heartland – Additional Package	2	First Class Mail
9/27/2023	Motion Mailing for Heartland – Additional Package	2	First Class Mail

EXHIBIT F-1

Deborah D. Williamson

Member



Contact

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

Overview

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

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

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

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

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, the United States Bankruptcy Court for the 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, Chapter 11 Bankruptcy Case No. 04-35574, pending in the United States Bankruptcy Court for the Northern District of Texas, Dallas Division

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

Bankruptcy and Restructuring — Energy

In re TXCO Resources Inc., Chapter 11 Bankruptcy Case No. 09-51807, pending in the United States Bankruptcy Court for the 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., Chapter 11 Bankruptcy Case No. 08-13384 (MFW), pending in the United States Bankruptcy Court for the District of Delaware

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

Creditors' Committee counsel in the Fort Worth bankruptcy cases of an international generator and marketer of electricity.

In re Aloha Airlines, Inc., Case No. 08-00337; Chapter 7 bankruptcy case pending in the United States Bankruptcy Court for the District of Hawaii, Honolulu Division

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

Bankruptcy and Restructuring — Healthcare

In re Fort Worth Osteopathic Hospital, Inc., dba Osteopathic Medical Center of Texas, Case No. 05-41513, Chapter 7 bankruptcy cases pending in the United States Bankruptcy Court for the 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.

Representation of a multi-state nursing and assisted living company in connection with its re-structuring of secured obligations.

Bankruptcy and Restructuring — Retail

In re Hardwood P-G, Inc., Custom Forest Products, Ltd., and Customer Forest Transportation, Inc., Chapter 11 bankruptcy cases jointly administered under Case No. 06-50057, pending in the United States Bankruptcy Court for the Western District of Texas, San Antonio Division

The Firm was counsel to the secured lender, Webster Business Credit Corp.

Counsel to a Chapter 11 trustee, a non-bank trustee, of an Austin-based e-commerce company and multi-state mortgage originator.

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., 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.

Investor Oversight Board (“IOB”) for I.G. Services, Ltd. (“IGS”) and IWG Services, Ltd. (“IWG”) pursuant to the Joint Plan of Liquidation proposed by Len B. Blackwell for IGS and IWG which filed for bankruptcy in the United States Bankruptcy Court for the 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.

Bankruptcy and Restructuring — Real Estate

In re Villaje Del Rio, Ltd., Case No. 06-50797, Chapter 11 bankruptcy case in the United States Bankruptcy Court for the 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. *Village Del Rio, Ltd. v. Colina Del Rio, LP (In re Village Del Rio, Ltd.)*, 283 Fed.Appx. 263 (5th Cir. June 25, 2008).

In re Joseph D. Milanowski, Case No. 07-13162, Involuntary Chapter 11 bankruptcy case pending in the United States Bankruptcy Court for the District of Nevada

We were lead counsel in the representation of the Chapter 11 Trustee, Ford Elsaesser in the case of Joseph Milanowski. 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.

Creditors' Committee counsel in the Corpus Christi 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

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, Chapter 11 bankruptcy case pending in the United States Bankruptcy Court for the Western District of Texas, El Paso Division

Our client was the purchaser of a hospital in El Paso.

Fee Examiner

Professional fee examiner in El Paso Refinery.

Plan Mediator

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

Credentials

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, 2003-2022
- 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 Certification, 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
- Former Dykema Managing Director
- Dykema Management Advisory Committee

Community

- San Antonio Public Library Foundation, former Director and Member of the Executive Committee
- Hope for the Future, Board Member, 2015 - Present

Related Employment

- Managing Director, Cox Smith

EXHIBIT F-2

Jeffrey R. Fine

Member



Contact

Dallas
214-462-6455
jfine@dykema.com

Overview

Jeff Fine is the “go-to” lawyer when financial or business relationships rupture, creditors and other stakeholders seek recoveries, or insolvency becomes an issue.

For creditors, public and private businesses, high net worth individuals, and those working out complex business and financial problems, Jeff brings decades of broad experience to achieve pragmatic solutions. Whether inside or outside the courtroom, he tenaciously works with his clients to solve their problems.

From niche family businesses to large corporations, Jeff has counseled clients in various industries. His forte is helping clients prioritize issues by separating immediate concerns from background noise. He adheres to a straightforward philosophy—stay calm, figure out the problem, explain it to the client, and collaboratively devise a solution. It’s an approach he often takes to deliver successful outcomes in even the most dire of scenarios.

Jeff’s experience is far-reaching. He advises debtors, lenders, creditors, and other stakeholders across the country on a wide range of business disputes and bankruptcy and insolvency issues in diverse settings, including power generation, aviation, oil and gas, and transportation. Matters he has negotiated and litigated include federal equity and state receiverships, loan workouts, complex Chapter 11 cases, trust disputes, defense- and plaintiff-side director and officer fiduciary liability actions, purchase of distressed business assets in and outside of bankruptcy proceedings, and representation of environmental remediation trusts.

A trusted advisor to his partners and colleagues and a leader within the firm, Jeff is Dykema’s assistant general counsel and a former executive committee member. Consistent with our national pro bono pledge, he volunteers his time and knowledge as outside general

Areas of client focus

Practices

Corporate and Finance
Government Reorganization and Restructuring
Private Equity
Restructuring and Bankruptcy

Industries

Dental Service Organizations (DSO)
Financial Services
Loan Workouts, Restructuring, and Bankruptcy
Managed Service Organizations

counsel to several nonprofits, including private schools and houses of worship within the Jewish community and other charitable organizations.

Experience

- Director and Officer (D&O) representation in fiduciary breach and usurpation of corporate opportunity cases.
- Receiver and trustee representation in federal equity receivership and litigation trust matters.
- Secured creditor representation in contested complex Chapter 11 matters.
- Debtor and lender representation in complex secured loan workouts.
- Representation of buyers of distressed business assets inside and outside of bankruptcy proceedings
- Defense of complex bankruptcy and insolvency related adversary proceedings and litigation.
- Lender representation in the workout and bankruptcies of troubled secured real estate and unsecured consumer loan portfolios involving Chapter 7 and 13 filings, out of court loan modifications, and foreclosures.
- Lender representation in the workout, bankruptcy and/or foreclosure of more than \$1 billion in secured commercial real estate loans in multiple jurisdictions.
- Lead attorney, Unsecured Creditors' Committee in the Texas Rangers Baseball Partners Chapter 11, with 100 percent payout, plus interest to unsecured creditors.
- Lead counsel for QSR and specialty lender servicers in distressed portfolio workouts, foreclosures and bankruptcies.
- Lead counsel to consortium of corporations regarding environmental issues in complex environmental services Chapter 11 cases.
- Lead bankruptcy counsel to large environmental trusts.
- Lead counsel to liquidating trust asserting complex breach of multiple duties of loyalty of officers and directors of former Chapter 11 debtors.
- Lead counsel in the successful Chapter 11 reorganization of the second largest vinyl and aluminum window manufacturer in the United States.
- Lead counsel in the successful Chapter 11 reorganization of a VOIP telecommunications company.
- Lead counsel in the successful Chapter 11 reorganization of the largest independent bookstore chain in the Southwest.
- Litigated and successfully settled antitrust claims against more than 18 booksellers, including major publishing houses and a national bookstore chain.
- Team member in the successful Chapter 11 reorganization of a major cargo and charter passenger airline.
- Counsel to airports in more than 25 airline bankruptcies. Lead counsel working in conjunction with the United States Department of Transportation on Passenger Facility Charge litigation on behalf of various airports in airline bankruptcy cases nationwide.
- Nationwide representation of various equipment lessors in complex Chapter 11 cases.
- Nationwide representation of various truck manufacturers in dealer bankruptcy and workout matters.

Credentials

Education

- Benjamin N. Cardozo School of Law, J.D.
- Columbia University, B.A.

Bar Admissions

- Texas
- New York

Professional Recognition

- Recognized in *The Best Lawyers in America*® for Bankruptcy and Creditor Debtor Rights/Insolvency and Reorganization Law, 2019-2024
- Recognized in *Texas Super Lawyers*® for Bankruptcy; Business & Corporate; Business Litigation, 2012-2023
- Named a "Best Lawyer in Dallas" by *D Magazine* for Bankruptcy & Workout, 2012-2020
- Recipient of an AV® Preeminent™ Rating by *Martindale-Hubbell*

Affiliations

Professional

- American Bar Association, Business Law Section, Business Bankruptcy
- Dallas Bar Association, Business Law Section, Business Bankruptcy
- American Bankruptcy Institute
- Northern District of Texas, Criminal Justice Act Panel

Community

- Member of a number of nonprofit boards

Patrick L. Huffstickler

Member



Contact

San Antonio
210-554-5273
phuffstickler@dykema.com

Overview

Patrick Huffstickler advises clients on a wide range of bankruptcy, landlord/tenant, Uniform Commercial Code (UCC), and other commercial litigation matters.

He provides counsel on issues related to the commercial real estate industry, including ongoing representation of commercial landlords and tenants of retail malls and shopping centers in national, regional and local bankruptcy cases. His bankruptcy and restructuring experience also spans many other industries, including technology, financial services and aviation.

Areas of client focus

Practices

Restructuring and Bankruptcy

Industries

Financial Services
Loan Workouts, Restructuring,
and Bankruptcy

Experience

TXCO Liquidating Trust

Counsel to a trust formed pursuant to the plan of reorganization confirmed in bankruptcy cases of TXCO Resources Inc., a mid-size exploration and production company. Dykema assisted in the liquidation of the trust's assets, including the sale of oil and gas properties located in multiple states. The liquidation resulted in a \$17,500,000 payment to former holders of equity in TXCO and a multi-million dollar return to the beneficiary of the trust.

In re TXCO Resources Inc., Chapter 11 Bankruptcy Case No. 09-51807, pending in the United States Bankruptcy Court for the Western District of Texas, San Antonio Division

Counsel to an exploration and production company who were Debtors in their chapter jointly administered 11 bankruptcy cases. 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.

Counsel to Creditor – Emerging Technology Venture Fund

Lead counsel for emerging technology venture fund which was the primary creditor in a chapter 11 bankruptcy case of a specialized candle and gift company in Austin, Texas.

Counsel to Unsecured Creditors

Counsel for official committees of unsecured creditors in national and regional bankruptcy cases.

Bankruptcy – E-commerce

Counsel for the chapter 11 trustee in a national e-commerce bankruptcy case in Austin, Texas.

Bankruptcy – Retail

- Ongoing representation of commercial landlords, including retail malls and shopping centers, in national, regional and local bankruptcy cases. Additionally, ongoing representation of numerous clients in connection with executory contract and lease issues as well as operational and claims matters related to those contracts and leases in national, regional and local bankruptcy cases.
- Ongoing representation of commercial landlords, including retail malls and shopping centers, in national, regional and local bankruptcy cases.
- Representation of debtor tenants and other parties regarding real estate lease issues in significant, complex chapter 11 bankruptcy cases. Experience includes representation in chapter 11 reorganizations of a regional discount retailer with 48 store leases and a national mall-based retailer with 711 store leases, including assumption/rejection, modification and claims issues.
- Representation of a computer maintenance and repair company in its chapter 11 case involving 80 real property leases.

Debt Restructuring Counsel – Home Health Agencies

Representation of home health agencies, including debt restructuring through chapter 11 and negotiations with the Department of Health and Human Services regarding Medicare overpayments and other matters.

Video Production and Media

Ongoing representation of full-service video production company and other media clients.

Debt Restructuring – Apartment Complexes

Debt restructuring through chapter 11 reorganizations of several limited partnerships owning apartment complexes and handling of landlord/tenant issues related to the tenant leases.

Counsel to Commercial Landlords

Representation of commercial landlords in the termination and modification of real property leases, including negotiating and drafting termination and modification agreements, in both bankruptcy and non-bankruptcy matters.

Property and Sales Tax Matters

Representation of various clients regarding personal property and sales tax matters.

Credentials

Education

- The University of Texas School of Law, J.D., *with honors*, 1986
- Trinity University, B.A., *cum laude*, 1983

Bar Admissions

- Texas, 1986

Professional Recognition

- Named "Lawyer of the Year" by *The Best Lawyers in America*® for Bankruptcy and Creditor Debtor Rights / Insolvency and Reorganization Law, 2024
- Recognized in *The Best Lawyers in America*® for Bankruptcy and Creditor Debtor Rights / Insolvency and Reorganization Law, 2020-2024
- Recognized by *San Antonio Magazine* in "San Antonio's Top Attorneys" for Bankruptcy & Workout, 2019-2022
- *S.A. Scene*, "San Antonio's Best Lawyers," Bankruptcy, 2005-2011, 2016, 2018
- Recognized by *S.A. Scene* in "San Antonio's Best Lawyers" for Bankruptcy
- Martindale-Hubbell® AV® Preeminent™ [Peer Review Rating](#)

Affiliations

Professional

- State Bar of Texas
- American Bar Association
- San Antonio Bar Association
- American Bankruptcy Institute
- San Antonio Bankruptcy Bar Association
- Turnaround Management Association

Teresa Ereon Giltner

Member



Contact

Dallas
214-698-7870
tgiltner@dykema.com

Overview

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

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

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

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

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

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

Areas of client focus

Practices

Real Estate
Restructuring and Bankruptcy

Industries

Financial Services

Experience

Bankruptcy – Regional Homebuilders

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

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

Representation of an equipment lessor/financier.

Bankruptcy – Restaurant Chain Acquisition

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

Gasoline Stations – Acquisitions

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

Public-Private Partnership Negotiation

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

East Texas Timber Ranch – Acquisition

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

Texas Land Acquisition and Development

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

Retail Leasing

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

Commercial Leasing

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

Financings

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

Financial Hedging

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

Credentials

Education

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

Bar Admissions

- Texas

Professional Recognition

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

Affiliations

Professional

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

Community

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

Danielle Rushing Behrends

Senior Attorney



Contact

San Antonio
210-554-5528
dbehrends@dykema.com

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.

Experience

Chapter 11 Debtor Representation

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

- 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.

Credentials

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

- Bexar County Women's Bar Association and Foundation – Belva Lockwood Outstanding Young Lawyer Award (2023)
- Named to *Best Lawyers'* "Ones to Watch" list for Bankruptcy and Creditor Debtor Rights / Insolvency and Reorganization Law; Litigation - Bankruptcy, 2023 and 2024
- 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
- 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
- Selected as a member of the Bexar County Women's Bar Foundation's LEAD Academy's 2019 class
- Featured in *San Antonio Woman Magazine* for volunteer pro bono service, 2022
- Featured in *Texas Bar Journal* as Access to Justice Pro Bono Champion, Apr. 2020

Affiliations

Professional

- National Conference of Bankruptcy Judges – Next Generation Program, Class of 2023
- 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
- San Antonio Bar Foundation, Fellow Class of 2020
- 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
- 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)

- American Bankruptcy Institute; Strength in Diversity Editorial Board
- Larry E. Kelly American Bankruptcy Inn of Court (2015-present) ◦ Judge Monroe and Judge McConnell Scholarship and Writing Competition Selection Committee
- William S. Sessions American Inn of Court (2018-2021)
- American Bar Association - ABA Young Lawyers Division Bankruptcy Law Committee Chair (2021-2022)
- Texas Young Lawyers Association
- Texas Bar College
- Phi Kappa Phi
- St. Mary's University Law Alumni Association
- San Antonio Legal Services Association (formerly San Antonio Bar Association's Community Justice Program), Board Member, Volunteer Pro Bono Attorney
- Texas Rio Grande Legal Aid, Volunteer Pro Bono Attorney
- National Association of Federal Equity Receivers (NAFER), Member

Community

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

Michael D. Wombacher

Associate



Contact

San Antonio
210-554-5221
mwombacher@dykema.com

Overview

Michael Wombacher is an associate in Dykema's San Antonio office. He focuses his practice on bankruptcy matters.

Areas of client focus

Practices

Restructuring and Bankruptcy

Industries

Loan Workouts, Restructuring, and Bankruptcy

Credentials

Education

- Washington University in St. Louis School of Law, J.D., Certificate in Business Law, 2021
- LSU Law, J.D., 2019
- Illinois Wesleyan University, B.A., 2018

Bar Admissions

- Texas

Washington University in St. Louis Sc

[2019 - 2021](#)

LSU Law

[2018 - 2019](#)

Affiliations

Related Employment

- Law Clerk for the Honorable H. Christopher Mott of the US Bankruptcy Court for the Western District of Texas Austin Division
- Legal Intern, United States Attorneys' Offices
- Legal Clerk, Fieldwood Energy LLC



Theresa Dick

Business Litigation Paralegal
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(616) 776-7546
TDick@dykema.com

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

Education

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

EXHIBIT F-3

Rose L. Romero



Attorney and Counselor at Law

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

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

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

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

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

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

Practices Areas

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

Education

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

Admissions

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

Languages

Spanish

Rose L. Romero

Prior Experience

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

Distinctions/Honors

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

Activities (Memberships/Affiliations)

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

Publications

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

Rose L. Romero

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

Rose L. Romero

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

News

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

Rose L. Romero

Immigration Law

In the News

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

EXHIBIT F-4

Darrell R. Jones

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

Work Experience

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

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

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

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

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

> Representative matters include:

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

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

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

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

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

Education and Credentials

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

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

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

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

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

Eric A. Hillerman

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

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

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

Professional Experience

Law Practice of Darrell R. Jones, PLLC

-Counsel: 3/22-Present

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

East Shore Investments LLC:

-General Counsel: 4/19-Present

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

Newfield Exploration Company (S&P 500 Company):

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

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

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

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

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

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

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

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

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

Newfield Exploration Mid-Continent Inc.:

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

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

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

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

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

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

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

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

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

Education & Admissions

Rice University-Jones School of Business: Advanced Management Program

University of Oklahoma: J. D.

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

State Bar of Texas

Oklahoma Bar Association

Industry Activities

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

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

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

Legal Committee Member for Oklahoma Independent Producer's Association

Oklahoma Mineral Law Section

Oil, Gas and Mineral Law Section of Texas Bar Association

Houston Bar Association Energy and Mineral Law Section

Other Management and Leadership Experience

Newfield Benefits Plan Committee (selected by NFX Executive leadership)

Newfield Vision Team (selected by NFX Executive leadership)

Past Chairman of the Board to Better Business Bureau of Amarillo

Civic Activities

USO of Houston: Volunteer-Bush IAH

Volunteer consulting attorney for Patrol Base Abbate (nationwide veteran's organization)

EXHIBIT F-5

VICKI PALMOUR CONSULTING, LLC

VICKI PALMOUR

Has 45 years experience as an oil and gas regulatory consultant. VPC has approximately 100 clients that we currently do work for monthly either for regulatory, accounting or regulatory and accounting needs.

Married

She and her husband own Texas Energy & Equipment LLP, an oil and gas tubular business, importing new pipe as well as buying used casing to drift, test and inspect.

AMY AMBURN

Married

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

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

JENNIFER RIGGINS

Divorced

Mother of 2 boys (1 in college and 1 in high school)

Attended college. Worked for attorney for 12 years prior to coming to work for VPC. Has worked for VPC for 4-1/2 years. Handles all Comptroller filings, some regulatory work and handles WolfePak accounting for a first purchaser of crude oil.

TAMMY JOBE

Married

Mother and grandmother

Has 20 years oil and gas experience. Handles two WolfePak accounts and files all monthly production reports to RRC.

Has worked for VPC for 5-1/2 years.

TYNA GOBER

Married

Mother of 4 and grandmother

Has worked in oil industry in some capacity for 20+ years in the Permian Basin (West Texas), including working for some major oil companies. Handles regulatory filings with RRC and SOS. Moved from Midland and went to work for VPC in July 2021.

EXHIBIT F-6



Madhu Ahuja, CPA, ABV, CVA, CFE

President

Ahuja & Clark, PLLC

mahuja@ahujaclark.com

(469) 467-4660

Madhu Ahuja is the President and founder of Ahuja & Clark, PLLC and has over 22 years of public accounting, tax and forensic experience. She specializes in complex financial investigations, forensic accounting, business income loss calculations, calculation of economic damages, business valuations and litigation support.

EDUCATION

Master of Science - Management & Administrative Sciences
The University of Texas at Dallas, Richardson, Texas

Post Graduate Diploma in Business Administration, Finance
Institute of Productivity Management, Kanpur, India

CERTIFICATIONS

Certified Public Accountant (CPA), Texas

Accredited in Business Valuation (ABV)

Certified Valuation Analyst (CVA)

Certified Fraud Examiner (CFE)

PROFESSIONAL EXPERIENCE

Ahuja & Clark, PLLC

PricewaterhouseCoopers, LLP

2003 - Present

1996 - 2002

SERVICE EXPERTISE

- Tracing and characterization of assets, and Fraud Analysis for Receivership
 - Reconstruction of financial records for Court appointed receivers
 - Tracing and reporting on misappropriation of funds
 - Winners and losers analysis
 - Claims management
 - Fraud analysis
- Ponzi analysis Fraud Analysis for Bankruptcy
 - Court appointed accountant by bankruptcy trustee
 - Solvency analysis
 - Fraudulent conveyance
 - Preference analysis
 - Ponzi analysis
- Business Interruption Calculation Covered by Insurance Policy
 - Engaged by insurance companies, insured's and attorneys to calculate business interruption loss



- and extra expense for a covered loss event
- Completed over 100 Business Interruption Claim Calculations and Reports
- Assisted with mediation involving business interruption calculation losses
- Fidelity Claims Loss Calculation Covered by Insurance Policy
- Forensic Accounting Services
- Investigation of fraud allegation
- Monetary loss fraud investigations
- Economic Loss Assessment
 - Economic damage quantification in breach of contract, construction delays and personal injury/death
- Business Valuations
 - Partner buy-outs
 - Medical practices
 - Franchises
 - Minority discount calculation
 - Marital dissolution
 - Gift tax returns & estate taxes
- Advanced Financial Analysis
 - Quality of Earnings
 - Financial Due Diligence
 - Net present value
 - Internal rate of return
 - Financial ratios
 - Cost of capital
 - Discounted cash flow applications
- Audit of Financial Statements
 - Audits of title company for Texas Department of Insurance
 - Audits of nonpublic companies
- Review and Compilation of Financial Statements
 - Preparation of detailed reports, professional presentations, and training
 - Detailed analysis of cash balances and other assets to discover irregularities
 - Understanding of complex financial transactions
- Tax Compliance & Special Reporting
 - Federal compliance, including corporations and foreign entities
 - Multi-state tax
 - State tax apportionment calculations
 - International compliance, including Forms 5471 and IRS amnesty programs
- Tax Research & Planning
 - Corporate reorganizations
 - Multi-state sales & use tax - audit management & support
 - State nexus rules
 - Taxation of shareholders
 - Joint ventures

PROFESSIONAL MEMBERSHIPS

- Member of American Institute of Certified Public Accountants (AICPA)
- Texas Society of Certified Public Accountants (TSCPA)
- Member of National Association of Certified Valuators and Analysts (NACVA)
- Member of Association of Certified Fraud Examiners (ACFE)
- National Association of Federal Equity Receivers (NAFER)



Carolyn Bremer, CPA

Managing Director, Advisory Department
 Ahuja & Clark, PLLC
 cbremer@ahujaclark.com
 (469) 467-4660

Carolyn Bremer is the Managing Director of the Advisory Department at Ahuja & Clark, PLLC. She brings over 23 years of experience in public accounting and forensic accounting. She specializes in fraud investigations, business disputes, data analytics, and compliance consulting. She works with a wide range of clients and industries to include legal counsel, private and public companies, public sector and governmental agencies.

EDUCATION

Master of Science - Accountancy
San Diego State University, San Diego, CA

Bachelor of Arts, English and Business Administration
Louisiana State University, Baton Rouge, LA

CERTIFICATIONS

Certified Public Accountant (CPA), Texas, Virginia

PROFESSIONAL EXPERIENCE

Ahuja & Clark, PLLC	2021 - Present
Armanino LLP	2016-2020
Weaver LLP	2012-2015
MoneyGram	2012-2012
Deloitte LLP	2007-2011
Resources Global Professionals	2005-2007
KPMG LLP	2002-2005
CNA Financial Corporation	2000-2002
KPMG LLP	1998-2000

SERVICE EXPERTISE

- Business Interruption and Income Loss Calculation
 - Calculation of business income loss resulting from a covered business interruption
 - Estimation of projected business income loss for litigation purposes
 - Calculation of spoilage and extra expense coverage resulting from covered damaging events
 - Forensic analysis of client documents and correspondence with insured and insurer
 - Preparation of detailed report summarizing calculations, methodologies, and reasoning
- Fraud Investigation
 - Financial accounting fraud
 - Employee theft
 - Embezzlement
 - Vendor fraud
 - Misappropriation of assets
- Business Disputes
 - Earnout agreements
 - Contract breach



- Buy/Sell disputes
- Forensic Accounting
 - Reconstruction of financial records
 - Tracing of funds
 - Data anomaly detection
 - Claims management
 - Fraud analysis
 - Interviews
 - Email review
- Compliance
 - BSA/AML compliance
 - Transaction monitoring
 - Suspicious activity reporting (SARs)
 - Purchasing compliance
 - Vendor compliance
 - Risk management
 - Internal controls
- Data Analytics
 - Anomaly detection
 - Trend analysis
 - Fund Tracing
 - Reconciliations

PROFESSIONAL MEMBERSHIPS

- Member of American Institute of Certified Public Accountants (AICPA)
- Texas Society of Certified Public Accountants (TSCPA)
- Member of Association of Certified Fraud Examiners (ACFE)
- Society of Corporate Compliance and Ethics (SCCE)

REPRESENTATIVE PROJECTS

- **Fraudulent Claims Audits**
 - Performed audits to determine legitimacy of insurance claims for one of the largest U.S. commercial property and casualty insurance companies.
- **Restatement Audit**
 - Managed the restatement audit of a multi-billion telecommunications company emerging from bankruptcy by coordinating the audit plan and monitoring milestones across three separate U.S. locations.
 - Reviewed hundreds of leasing agreements for corresponding proper accounting treatment.
 - Drafted and reviewed hundreds of adjusting entries related to the corresponding fraud.
- **International Investigation**
 - Engaged by manufacturer of semiconductor and computer technology to perform a joint investigation at an international plant location regarding the theft of semiconductor chips and other internal control issues.
- **Bankruptcy Proceedings**
 - Worked with Trustee and SIPC through bankruptcy proceedings of the largest failed investment



bank in U.S. history.

- Managed the securities claim process, which resulted in a total customer reimbursement of billions of dollars and all securities customer claims being 100 percent fulfilled.
- **Expense Validation for Deepwater Horizon Oil Spill**
 - Analyzed data anomalies to assist in the validation of claims and to target recoveries related to a multi-billion-dollar oil spill.
 - Defined informational requirements for development of a reporting structure for various internal and external parties in the wake of the incident.
- **Vendor Contract Review**
 - Identified conflict of interest in the contract negotiation of a vendor contract for a large telecommunications company, and lack of proper monitoring on behalf of the vendor.
 - Resulted in recommendation to renegotiate the contract and a future cost savings of several million dollars.
- **Financial Services Compliance**
 - Managed a team of twenty-two analysts monitoring daily transactional data for identification of patterns/trends of suspicious activity as it relates to risks associated with BSA violations, to include money laundering, fraud, terrorist financing, and global sanctions lists.
 - Redefined rules utilized to target suspicious transactional activity resulting in increased effectiveness in SAR reporting
- **School District Investigation of Tutor Program Vendors**
 - Investigated several vendors providing tutoring services under the SES program for a Texas school district. Uncovered falsified documentation supporting fraudulent claims for services never provided. Resulted in vendor terminations, recovery of funds and guilty plea from two former tutoring company owners in federal court.
- **Investigation of School District Bond Program**
 - Performed a forensic audit of a \$388 million bond construction program for a Texas school district which included a review of over five years of construction project records and over 70 interviews with school administrators, finance personnel, and construction project managers.
 - Coordinated with both the FBI and the District Attorney's office.
- **Construction Fraud and Employee Theft**
 - Conducted a dual investigation for an investment firm around the construction of several elderly care facilities and a \$500,000 internal employee fraud.
 - Reviewed bank statements, credit card statements, and fraudulent reconciliations related to the employee fraud resulting in coordination with postal inspectors and recommendation for recovery of funds.
 - Reviewed invoice support and construction progress reports related to the elderly care facilities which resulted in litigation with the General Contractor.
- **Oil & Gas Vendor Fraud**
 - Investigated the vendor expenses related to a large pipeline project.



- Uncovered expenses for several ghost vendor employees and other falsified expenses resulted in a \$2 million recovery.
- **Earnout Dispute**
 - Performed analysis and provided support for an earnout dispute related to the sale of a family owned appliance supply business resulting in a \$1.3 million-dollar payout to the seller.
- **Investigation into School District Purchasing**
 - Provided forensic investigation services related to allegations of improper purchases by a Texas school district.
 - Resulted in over 40 investigative interviews, analysis of hundreds of documents, and review of hundreds of emails with a final report to the School Board.
- **Non-Profit Employee Embezzlement**
 - Conducted an investigation into employee embezzlement at a nonprofit organization occurring over a 10-year period and resulting in over \$700k in losses.
 - Assisted the organization with filing an insurance claim to recover losses and filed report with the local District Attorney's office.



Stacey Huser

Manager, Accounting Department
 Ahuja & Clark, PLLC
 shuser@ahujaclark.com
 (469) 467-4660

Stacey Huser is the Manager of the Accounting department for Ahuja & Clark, PLLC, overseeing the forensic, audit, and general accounting areas of the practice. Stacey's background includes over 20 years of accounting experience in both public & private accounting. She assists with reviewing financial statements, asset tracing, and analysis of complex financial transactions.

EDUCATION

Bachelor of Science - Accounting
Oklahoma State University, Stillwater, OK

PROFESSIONAL EXPERIENCE

Ahuja & Clark, PLLC	2016–Present
Aly Centrifuge, Inc.	2014–2016
Quest Events, LLC	2012–2014
Ahuja & Clark, PLLC	2007–2012
Ritchie Bros. Auctioneers (America) Inc.	2002–2005
MCS	1998–2001

SERVICE EXPERTISE

- Forensic Accounting Services
 - Tracing and characterization of assets
 - Investigation of fraud allegation
 - Monetary loss fraud investigations
 - Discovery and reporting of misappropriation of funds
- Economic Loss Assessment
 - Economic damage of business interruption
 - Business Interruption Calculation Covered by Insurance Policy
- Audit of Financial Statements
 - Audits of title company for Texas Department of Insurance
 - Audits of nonpublic companies
- Review and Compilation of Financial Statements
 - Preparation of detailed reports, professional presentations, and training
 - Detailed analysis of cash balances and other assets to discover irregularities
 - Understanding of complex financial transactions
- Tax Compliance & Special Reporting
 - Multi-state tax
 - State tax apportionment calculations
- Tax Research
 - Multi-state sales & use tax
 - State nexus rules
- Audit Management & Support
 - Information document requests



- Drafting of responses to states
- Research of tax issues
- Advanced Financial Analysis
 - Net present value
 - Internal rate of return
 - Financial ratios
 - Cost of capital
 - Discounted cash flow applications
- Accounting
 - Intercompany consolidations
 - Payroll processing and reconciliations
 - Budgeting and variance analysis
 - Software implementation
 - Acquisition integrations

PROFESSIONAL MEMBERSHIPS/POSITIONS

Member of Association of Certified Fraud Examiners (ACFE)



Ahuja & Clark, PLLC

Certified Public Accountants

Tax & Accounting • Business Valuation • Business Interruption • Forensic Accounting

Ahuja & Clark Staff Supporting Fee Application

Dr. Anthony Cecil

Tony will serve as forensic support staff for this engagement. He specializes in complex financial investigations, forensic accounting, financial analysis, compliance consulting, and litigation support. He works with a wide range of clients and industries to include legal counsel, private and public companies and governmental agencies. He also teaches graduate courses in Forensic Accounting, Financial Investigations and Fraud Auditing.

Dawn Peterson

Dawn will serve as administrative support for this engagement. She has experience in managing projects in a wide variety of industries and has been at A&C for more than 2 years.

Divya Shetty

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

Jeanne-Marie Blevins

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

Linu Dayaran Kandy

Linu will serve as tax support for this engagement. She is a Senior Staff Accountant at Ahuja & Clark, PLLC and has over 7 years of experience in Tax Compliance.

EXHIBIT F-7

Daniel McElhinney

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

Robert Saraceni

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

Kevin Wasserman

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

Daniel Ramirez

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

Jessie De Guzman

In her role as Associate, Jessie De Guzman is responsible for responding to calls and email inquiries regarding general information about the case, which includes providing information resources, representing Stretto as the claims and noticing agent.

Sheryl Betance

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

Alexa Westmoreland

In her role as Director, Alexa oversees the day-to-day logistics of case management. Particularly adept at pre-filing preparation, Schedules/SOFA, and solicitation, Alexa is knowledgeable on the technical, start-to-finish aspects of claims administration. Clients value Alexa's unwavering responsiveness and ability to offer onsite assistance whenever needed to ensure there is minimal disruption to their business operations. Alexa develops training materials and conducts educational sessions on effective case management to ensure a consistent approach. She also serves as a leader and mentor to the more junior members of the team, offering practical assistance and guidance to further their professional development.

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.

Pauline Aragon

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

IT Staff

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

Melissa Membrino

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

David Bribiesca

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

Alberto Chacaqua

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

Jacob Ingram

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

Aimee Marshall

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

Stephanie Morales

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

Nicholas Kennedy

With over a decade of financial-services and corporate-restructuring expertise, Nick brings significant industry experience to his role as Practice Counsel. Working closely with Stretto's Leadership Team, he offers advice on legal matters pertaining to the implementation of the company's new services and practice areas. Nick also oversees both tactical and strategic initiatives, providing legal insight to guide the day-to-day activities and the long-term vision of Stretto's Corporate Restructuring, Specialty Deposits and Trustee Suite solutions. Leveraging best practices, Nick utilizes proven methodologies to conduct research and provide legal guidance supporting overall business practices and requirements. Prior to joining Stretto, Nick served as Senior Counsel, Senior Vice President with Citizens Bank and was a member of McGuireWoods' Restructuring and Insolvency Practice Group.

Ricky Quang

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

Naomi Rodriguez

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

Antonio Rubio

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

Charles Wheeler

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