



**RECEIVER’S FEE APPLICATION FOR SERVICES PERFORMED BETWEEN  
JANUARY 1, 2024 AND MARCH 31, 2024, AND BRIEF IN SUPPORT**

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

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

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<sup>1</sup> Capitalized terms used herein but not otherwise defined shall have the meaning ascribed in the Receivership Order or the Tenth Report (as defined herein).

Practice of Darrell R. Jones, PLLC (“Jones”), Vicki Palmour Consulting, LLC (“Palmour”), Ahuja & Clark, PLLC n/k/a Ahuja & Consultants, Inc. (“Ahuja”),<sup>2</sup> 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 Tenth Quarterly Report for Receivership Estates (January 1, 2024 – March 31, 2024)* [ECF No. 496] (the “Tenth Report”), the Receiver, with the assistance of her Retained Personnel, analyzed and, where appropriate, objected to claim submissions of the Receivership Parties’ creditors in accordance with the Court-approved claims procedure; continued to identify and ultimately resolved issues with the Railroad Commission of Texas (“RRC”), which included negotiating and filing of the RRC claim stipulation between the Receiver and the RRC; identified and attempted to resolve pre-receivership reporting issues with the Texas Comptroller of Public Accounts (the “Comptroller”); held an online, public auction of personal property pursuant to Court-approved procedures; and negotiated various settlements between the Receiver and third parties, benefiting the Receivership Estates. Amounts owed for production to third parties unaffiliated with any Receivership Party were identified and final royalty payments were issued. The Receiver engaged a third-party escheat vendor to commence the escheatment process with the Comptroller. A substantial amount of time was spent in the first quarter of 2024 on the Court-approved claims procedure, focusing on communications with various creditors, including investors (potential and known), vendors, and governmental agency contacts, and claims analysis and allowance and/or objection, as appropriate. The Receiver has

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

now proposed a distribution methodology for Court approval. *See generally* ECF No. 534. The Receiver also negotiated the settlement of certain claims and causes of action of certain Heartland-related Receivership Parties with respect to former counsel, Locke Lord LLP, which has now been approved. *See generally* ECF Nos. 535, 536. Additionally, the Receiver and her team continue to analyze various records relating to other potential assets and/or claims of the Estates.

2. Communications with investors, vendors, and other creditors steadily increased throughout the Application Period (defined below) as approximately 1,488 claims packages were delivered to investors and known non-investor creditors and claim submissions were received, both before and after the February 5, 2024, at 11:59 p.m. Central bar date (the “Bar Date”). Specifically, Ms. Behrends, on behalf of the Receiver, held approximately 150 telephone conferences with known and potential investors (not including calls with non-investor creditors) regarding the claims procedure, including the proof of claim forms and questions on their respective transaction schedule and/or net transaction amount. The Receiver and her team continued daily communications with investors (known and potential), vendors, creditors, and other stakeholders via email regarding Case status and the claims procedure. The website ([www.heartlandreceivership.com](http://www.heartlandreceivership.com)) is continuously updated with key court documents, notices, and reports.

3. 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 115.50 hours in the fourth quarter of 2023 to 89.70 hours in this Application Period, Dykema’s hours decreased from 548.90 hours in the fourth quarter of 2023 to 345.30 in this Application Period, Palmour’s hours decreased from 60.25 hours in the fourth quarter of 2024 to 11.00 hours in this Application Period, and Stretto’s hours decreased from

645.70 hours in the fourth quarter of 2023 to 182.30 hours in this Application Period. Dykema has also voluntarily reduced the requested reimbursement by \$9,842.20, including time spent by the Receiver and by Dykema attorneys during the Application Period.

4. At the beginning of the first quarter of 2024, the Receiver had \$10,036,025.67 on deposit. At the end of the first quarter of 2024, the amount on deposit was \$9,629,770.27 after payments of operating expenses and Court-approved fees and expenses. As of the filing of this Application (May 15, 2024), \$9,639,888.52 is in the Receivership bank accounts.

## II. RELIEF REQUESTED

5. This Application seeks authorization from the Court to pay on an interim basis fees and expenses for professional services performed from January 1, 2024 through March 31, 2024 (the “Application Period”), by the Receiver in the amount of \$60,547.50 for fees; Dykema, as lead counsel to the Receiver, in the amount of \$127,115.95 for fees and in the amount of \$10,546.60 for expenses; Romero, as local counsel to the Receiver, in the amount of \$850.00 for fees; Jones, as oil and gas transactional counsel to the Receiver, in the amount of \$10,985.00 for fees; Palmour, as oil and gas consultant to the Receiver, in the amount of \$1,100.00 for fees; Ahuja, as tax and forensic accountants to the Receiver, in the amount of \$105,705.00 for fees and in the amount of \$155.76 for expenses; and Stretto, as claims and disbursement agent to the Receiver, in the amount of \$26,807.25 for fees and in the amount of \$121.80 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.

6. 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 January 1, 2024 through March 31, 2024.

### **III. GENERAL BACKGROUND**

7. This Application is submitted in accordance with the Receivership Order, the local rules of this Court, and the *Billing Instructions for Receivers in Civil Actions Commenced by the United States Securities and Exchange Commission* (the “Commission Billing Instructions”), and other applicable orders of this Court. The Receiver, Dykema, Romero, Jones, Palmour, Ahuja, and Stretto have previously submitted fee applications to this Court in this Case. *See generally* ECF Nos. 132, 198, 245, 280, 334, 361, 386, 427, 453. Through the first quarter of 2024, the Receiver, Dykema, Romero, Palmour, Jones, Ahuja, and Stretto have been paid on an interim basis for services performed on behalf of the Receiver in this Case, all to the extent authorized by this Court. *See generally* ECF Nos. 163, 216, 259, 265, 290, 348, 372, 407, 439, 460, 454. The Receiver submitted this Application to the Commission (as defined below) for review prior to submission to the Court.

#### **A. Procedural History**

8. 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”).

9. 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.*

10. 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.

11. 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.

12. Further, the Receivership Order authorizes the Receiver to “engage and employ persons in the Receiver’s discretion to assist the Receiver in carrying out the Receiver’s duties and responsibilities[.]” *Id.* at ¶ 8(H). 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.

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

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<sup>3</sup> The Receiver’s standard hourly rate for 2021 was \$840.00, the Receiver’s standard hourly rate for 2022 was \$880.00, the Receiver’s standard hourly rate for 2023 was \$950.00, and the Receiver’s standard hourly rate for 2024 is \$980.00. Dykema members’ and senior counsels’ standard hourly rates ranged from \$425.00-\$925.00 for 2021, \$425.00-\$1,400.00 for 2022, and \$470.00-\$1,400.00 for 2023. Dykema members’ and senior counsels’ standard hourly rates range from \$515.00-\$1,095.00 for 2024. Dykema associates’ and senior attorneys’ standard hourly rates ranged from \$370.00-\$505.00 for 2021, \$395.00-\$530.00 for 2022, and \$395.00-\$610.00 for 2023. Dykema associates and senior attorneys’ standard hourly rates range from \$435.00-\$625.00 for 2024.

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

15. 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.

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

17. 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.

18. 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.

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

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



21. 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”).

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

23. 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”).

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

25. 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”).

26. 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**

27. Since the beginning of this Case, the tasks and challenges presented have been numerous and, in many instances, novel, complex, and time-consuming. The efforts of the Receiver and her Retained Personnel during the Application Period resulted in several successful negotiations and settlements in this Case, execution of the Court-approved claims procedure, and tangible progress towards a distribution to investors and other creditors, as evidenced herein.

28. The Receiver incorporates by reference the *Receiver’s First Quarterly Report for Receivership Estates* [ECF No. 126], the *Receiver’s Second Quarterly Report for Receivership*

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

29. Generally, the bulk of Dykema's services rendered during the Application Period included drafting motions, notices, and other documents and appearing before the Court at various hearings; working with Ahuja and Stretto on various aspects of the claims procedure; analyzing investor and non-investor claim documentation; issuing the Receiver's Reply to approximately 131 claim submissions of known investors and other creditors on or before the April 5, 2024 deadline in accordance with the Court-approved claims procedure; assisting the Receiver with mitigation of risks; issuing final royalty packages to royalty owners and processing returned packages for inclusion in the escheatment process; formulating and coordinating escheatment issues with Palmour and Jones; investigating potential causes of action; negotiating and resolving issues with the RRC, ultimately resulting in the Court's approval of the RRC's allowed claim amount in this Case; investigating and settling causes of action on behalf of the Receiver with respect to 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; responding to a substantial number of investor (potential and known), other creditor, and federal and state governmental agency correspondences, particularly relating to the claims procedure and related notices, including transaction schedules for known investors; and selling certain personal property through Court-approved sale procedures. 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.

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

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

32. Palmour's services rendered during the Application Period included responding to regulatory and governmental reporting requirements through the date of abandonment of certain oil and gas properties to various state agencies, including, but not limited to, the RRC and the Comptroller. Palmour also played an integral role in preparation and issuance of final royalty packages to royalty owners through the date of abandonment. Additionally, Palmour prepared and filed Form 1099s on behalf of certain Receivership Parties for the 2023 tax year. During the Application Period, Palmour's regulatory compliance and management included, but was not limited to:

- (a) Reviewing mail, e-mails, etc. from the RRC regarding alleged violations, including field or filing violations;
- (b) Conference calls, as needed, with the Receiver and her team regarding abandonment and compliance;

- (c) Finalizing royalties and other amounts due to third parties, including running pay, suspense, and flush reports in WolfePak;
- (d) Updating contact information for royalty owners of various operators;
- (e) Preparing outstanding suspense and flush revenue lists for Panther City Energy LLC and Barron Petroleum LLC, and worked with the Receiver's counsel on issues relating to same;
- (f) Voiding returned checks for final royalty payments and place back into suspense in WolfePak; and
- (g) Preparing and reporting items related to escheatment of suspense revenue.

33. Ahuja's services rendered during the Application Period included preparing federal tax returns for the 2023 tax year for certain Receivership Parties with filing obligations, which included issues relating to abandonment of assets and intercompany receivables; preparing and filing Forms 1099-NEC for the 2023 tax year for various Receivership Parties; calculating expense allocations for Receivership Parties; assisting the Receiver and her counsel in responding to various notices received from the Internal Revenue Service, Social Security Administration, Texas Workforce Commission, and other governmental authorities; assisting the Receiver's counsel throughout the claims procedure, including confirming receipt of investors' funds and responding to specific investor inquiries on claim submissions; analyzing various distribution methods and calculations relating to same; and tracing funds relating to the purchase of the Bahamas properties and preparing documentation on same.

34. Stretto's services rendered during the Application Period included review and reconciliation of claim submissions and supporting documentation, if any, for investor and non-investor claimants; maintenance and updating of the claims database; processing claim materials and preparing claims reports for the Receiver and her counsel; preparing and revising investor and non-investor matrices; and serving various notices, claim forms, non-investor and/or investor claim packages (both known and potential), and pleadings as requested by Dykema.

**C. Fees and Expenses Summary During the Application Period**

35. The Receiver expended an aggregate of 89.70 hours on this Case during the Application Period. The Receiver's fees for the Application Period total \$60,547.50.

36. Through this Application, Dykema seeks approval on an interim basis for fees and expenses incurred by the Receiver and other Dykema professionals. Dykema expended an aggregate of 345.30 hours on this Case during the Application Period. At Dykema's discounted hourly rates and after other voluntary reductions, Dykema's fees for the Application Period total \$127,115.95 and expenses incurred in connection with services performed on behalf of the Receiver during the Application Period total \$10,546.60.<sup>4</sup>

37. Romero reported an aggregate of 2.00 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 \$850.00. Romero did not incur any expenses during the Application Period.

38. Jones expended an aggregate of 33.80 hours on this Case during the Application Period. At Jones's discounted standard hourly rate of \$325.00 per hour for all counsel, Jones's fees for the Application Period total \$10,985.00. Jones did not incur any expenses during the Application Period.

39. Palmour expended an aggregate of 11.00 hours on this Case during the Application Period. Palmour's fees for the Application Period total \$1,100.00. Palmour did not incur any expenses during the Application Period.

40. Ahuja expended an aggregate of 438.50 hours on this Case during the Application Period. Ahuja's fees for the Application Period total \$105,705.00, and Ahuja's expenses incurred

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<sup>4</sup> 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.

in connection with services performed on behalf of the Receiver during the Application Period total \$155.76.

41. Stretto expended an aggregate of 182.30 hours on this case during the Application Period. Stretto's fees for the Application Period total \$26,807.25, and Stretto's expenses incurred in connection with services performed on behalf of the Receiver during the Application Period total \$121.80.

#### IV. RECORDS SUPPORTING THIS APPLICATION

42. 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.

43. 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.

44. 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.

45. 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.

46. In addition, Dykema, Romero, Jones, Palmour, Ahuja, and Stretto have categorized their services by task. Attached hereto as **Exhibit D** is the *Summary of Fees by Task for All Matters*, which summarizes the number of hours incurred relative to each task category for each firm during the Application Period. It contains individualized and detailed descriptions of the daily services rendered and the hours expended by the professionals employed on behalf of the Receiver in this Case. During this Application Period, Dykema incurred \$10,546.60 in expenses in connection with the rendition of services on behalf of the Receiver, Ahuja incurred \$155.76 in expenses in connection with the rendition of services on behalf of the Receiver, and Stretto incurred \$121.80 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.

47. Attached hereto as **Exhibit E-1** is the invoice of Dykema, with the Receiver's time and any 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.

48. 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**

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

**VI. BRIEF IN SUPPORT OF APPLICATION**

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

51. 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).

52. The complexity and difficulty associated with the receivership case are highly relevant factors in determining the reasonableness of professional fees. *See W.L. Moody & Co.*, 374 F. Supp. at 484; *SEC v. Fifth Ave. Coach Lines, Inc.*, 364 F. Supp. 1220, 1222 (S.D.N.Y. 1973). Since the inception of this Case, the Receiver and her team have had to conduct their work without meaningful assistance from nearly all of the Defendants and Relief Defendants, exacerbated by the inability to access the various Receivership Parties' accounting and regulatory books, records, and software. The Receiver and her Retained Personnel have spent significant time and resources attempting to narrow and resolve various state and federal governmental agency issues, mostly notably resolving the RRC's claim. 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. This Court also considered and approved the Receiver's stipulation with the RRC on its allowed claim amount in this Case. *See generally* ECF Nos. 480, 497, 498.

53. The Receiver and her Retained Personnel diligently worked on and spent substantial time during the Application Period on the Court-approved claims procedure. Many known investors in this Case do not own computers or have access to email or the internet. Thus, the Court-approved claims procedure provided for both electronic and hardcopy noticing to known investors and other creditors, while also protecting the name and contact information of known investors. The claims procedure also placed as little burden as possible on known investors. As approved by this Court, if a known investor agreed with the Receiver's proposed claim amount, then the known investor did not need to submit a proof of claim with supporting documentation to Stretto, and their identity and contact and investment information was not disclosed. However, if a known investor disputed the Receiver's proposed claim amount, then the known investor was required to submit a proof of claim, along with supporting documentation, to Stretto so that it was

actually received on or before the February 5, 2024 Bar Date. Dykema updated the Receivership’s website “Claims Process” page with relevant information relating to the claims procedure on a rolling basis. Stretto continued to serve the Court-approved notices and claim forms on all known non-investor creditors and all potential and known investors in hard copy or via email as requested by Dykema. Stretto also worked with Dykema and Ahuja, as necessary, on investor inquiries and claim package noticing. Ms. Behrends of Dykema specifically spoke to over 150 investors via telephone during the Application Period on inquiries relating to the claims procedure and/or transaction schedules. Ms. Behrends continued to respond to correspondence from investors and non-investor creditors on the claims procedure during the Application Period. Additionally, Dykema issued the Receiver’s Reply to at least 131 disputed claim submissions on or before the April 5, 2024 deadline to both known investors and other non-investor creditors. The number of disputed claims to be considered by the Court has been reduced to 35.

54. 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.

55. Since December 2021, the Receiver and her team have successfully recovered over \$10 million dollars from auctions of personal property and the sale of 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 personal property, obtained rulings in favor of the Receivership Estates, and diligently worked on the Court-approved claims procedure, including resolving certain claim objections, so that a distribution methodology could ultimately be proposed to this Court for approval.

56. 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.<sup>5</sup>

57. 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.

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<sup>5</sup> 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.

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

59. 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**

60. 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.

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

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

- (a) Communicating with hundreds of investors (both known and potential), creditors, and other state and federal governmental authorities regarding various Receivership Parties, including, but not limited to, via website ([www.heartlandreceivership.com](http://www.heartlandreceivership.com)), telephone (210-554-5845), and email ([heartlandreceivership@dykema.com](mailto:heartlandreceivership@dykema.com));
- (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;
- (d) Facilitating administrative and daily operational tasks requested by the Receiver;
- (e) Selling certain personal property pursuant to Court-approved sale procedures;

- (f) Attempting to narrow and/or resolving issues relating to various governmental agencies, notably including the RRC;
- (g) Mitigating risks of the Receiver;
- (h) Investigating, pursuing, and/or settling causes of action held by the Receivership Estates; and
- (i) Executing the Court-approved claims procedure in this Case.

63. 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**

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

#### **Jones**

65. During the Application Period, Jones served as the Receiver's oil and gas transactional counsel in this Case. Jones assisted with the abandonment and escheatment processes and was point of contact regarding the farmout process. In addition, Jones communicated with the Receiver and Dykema throughout the Application Period regarding open abandonment and regulatory issues in the Case. Jones also worked with the escheat vendor to complete the escheatment process after issuance of final royalty packages.

**Palmour**

66. 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 through the date of abandonment. Palmour prepared documentation requested by the Receiver and/or her counsel to issue final royalty packages to royalty owners, in addition to issuing Form 1099s for the 2023 tax year for Barron Petroleum LLC and Panther City Energy LLC.

**Ahuja**

67. During the Application Period, Ahuja served as the Receiver's accountants in this Case to analyze and review available tax and bank records of Receivership Parties. As detailed above, Ahuja responded to various notices from the Internal Revenue Service, Social Security Administration, and other governmental authorities for various Receivership Parties, in addition to preparing the federal tax returns of various Receivership Parties. Ahuja also issued Form 1099-NECs for the 2023 tax year and calculated expense allocations for various Receivership Parties.

68. With respect to forensic accounting, Ahuja provided responses to the Receiver's counsel on various disputed investor claim submissions and answered specific investment inquiries. Ahuja also supported the Receiver, her counsel, and Stretto by providing various financial information as part of the claims procedure.

**Stretto**

69. During the Application Period, Stretto served as the Receiver's claims and disbursement agent in this Case. Stretto communicated with the Receiver and her Retained Personnel throughout the Application Period regarding the claims procedure and associated forms and notices, maintained and continuously updated the claims database, reconciled claim submissions, and prepared reports for the Receiver and Dykema on same. Stretto also facilitated



additional service of the claims packages to known non-investor creditors and investors (potential and known) and other pleadings, as requested. Stretto processed technical inquiries with respect to the claims database and submission of claims. Stretto continued to update investor contact information during the Application Period at the request of Dykema.

**Fees and Expenses of Receiver's Retained Personnel**

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

71. 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.

72. 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	89.70 hours	\$60,547.50	\$0.00
Dykema Gossett PLLC	345.30 hours	\$127,115.95	\$10,546.60
Law Offices of Romero   Kozub	2.00 hours	\$850.00	\$0.00
Law Practice of Darrell R. Jones, PLLC	33.80 hours	\$10,985.00	\$0.00
Vicki Palmour Consulting, LLC	11.00 hours	\$1,100.00	\$0.00
Ahuja & Clark, PLLC n/k/a Ahuja & Consultants, Inc.	438.50 hours	\$105,705.00	\$155.76
Bankruptcy Management Solutions Inc. d/b/a Stretto	182.30 hours	\$26,807.25	\$121.80

73. 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.

74. 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 \$9.2 million, exclusive of any recovery from settlements or any remaining personal property disposition.

## VII. CONCLUSION

75. 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 \$60,547.50, (ii) all fees incurred by Dykema as counsel to the Receiver during the Application Period, totaling \$127,115.95, (iii) all fees incurred by Romero as counsel to the Receiver during the Application Period, totaling \$850.00, (iv) all fees incurred by Jones as oil and gas transactional counsel to the Receiver during the Application Period, totaling \$10,985.00, (v) all fees incurred by Palmour as oil and gas consultant to the Receiver during the Application Period, totaling \$1,110.00, (vi) all fees incurred by Ahuja as tax and forensic accountants to the Receiver during the Application Period, totaling \$105,705.00, and (vii) all fees incurred by Stretto as claims and disbursement agent to the Receiver during the Application Period, totaling \$26,807.25; (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 \$10,546.60, (ii) all expenses incurred by Ahuja in connection with services rendered as tax and forensic accountants to the Receiver during the Application Period, totaling \$155.76, 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 \$121.80; (c) authorizing the Receiver to pay (i) all authorized outstanding fee amounts to Dykema, including the Receiver's fees, totaling \$187,663.45, (ii) all authorized outstanding fee amounts to Romero, totaling \$850.00, (iii) all authorized outstanding fee amounts to Jones, totaling \$10,985.00, (iv) all authorized outstanding fee amounts to Palmour, totaling \$1,100.00, (v) all authorized outstanding fee amounts to Ahuja, totaling \$105,705.00, and (vi) all authorized outstanding fee amounts to Stretto, totaling \$26,807.25; (d) authorizing the Receiver to pay (i) all authorized outstanding expenses of Dykema, totaling \$10,546.60, (ii) all authorized outstanding

expenses of Ahuja, totaling \$155.76, and (iii) all authorized outstanding expenses of Stretto, totaling \$121.80; and (e) awarding such other and further relief that this Court deems just and proper.

Dated: May 15, 2024

Respectfully submitted,

By: /s/ Deborah D. Williamson

Deborah D. Williamson

(Receiver)

State Bar No. 21617500

dwilliamson@dykema.com

**DYKEMA GOSSETT PLLC**

112 East Pecan Street, Suite 1800

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and

Rose L. Romero

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and

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drj@oilesquire.com  
**LAW PRACTICE OF  
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Telephone: (832) 302-5373

**COUNSEL TO RECEIVER**

and

Vicki Palmour  
**VICKI PALMOUR CONSULTING, LLC**  
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Graham, Texas 76450  
Telephone: (940) 549-0131

**OIL AND GAS CONSULTANT  
TO RECEIVER**

and

Madhu Ahuja  
**AHUJA & CLARK, PLLC n/k/a  
AHUJA & CONSULTANTS, INC.**  
2901 N. Dallas Parkway, Suite 320  
Plano, Texas 75093  
Telephone: (469) 467-4660

**ACCOUNTANT TO RECEIVER**

and

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 supports the relief requested herein.

*/s/ Danielle Rushing Behrends*  
Danielle Rushing Behrends

**CERTIFICATE OF SERVICE**

I hereby certify that on May 15, 2024, the foregoing document was served via CM/ECF on all parties appearing in this case and via email on the following unrepresented parties on this Court's docket:

James Ikey  
[james.ikeyrcg@gmail.com](mailto:james.ikeyrcg@gmail.com)

Bridy Ikey  
[bridydikey@gmail.com](mailto:bridydikey@gmail.com)

IGroup Enterprises LLC  
c/o James Ikey  
[james.ikeyrcg@gmail.com](mailto:james.ikeyrcg@gmail.com)

John Muratore  
[jmuratore6@gmail.com](mailto:jmuratore6@gmail.com)

Muratore Financial Services, Inc.  
c/o John Muratore  
[jmuratore6@gmail.com](mailto:jmuratore6@gmail.com)

Thomas Brad Pearsey  
[bradpearsey@aol.com](mailto:bradpearsey@aol.com)

Manjit Singh (aka Roger) Sahota  
Harprit Sahota  
Monrose Sahota  
[rogersahota207@gmail.com](mailto:rogersahota207@gmail.com)

Sunny Sahota  
[sunnysanangelo@gmail.com](mailto: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  
n/k/a Ahuja & Consultants, Inc.  
Applicant

**APPLICATION CERTIFICATION**

I hereby certify that:

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

/s/ Sheryl Betance

Sheryl Betance  
Bankruptcy Management Solutions Inc.  
d/b/a Stretto  
Applicant

**EXHIBIT A**

		Detail	Subtotal	Grand Total
1	Beginning Balance (January 1, 2024):			\$ 10,036,025.67
2	Business Income	Operations payments	1,105.93	1,105.93
3	Cash and Cash Equivalents	Settlement Payments	77,000.00	77,000.00
4	Interest/Dividend Income		40,039.28	40,039.28
5	Business Asset Liquidation		-	-
6	Personal Asset Liquidation	Auction proceeds	5,048.00	5,048.00
7	Third-Party Litigation Income		-	-
8	Miscellaneous - Other	Refunds	394.08	394.08
	<b>Total Funds Available</b>			<b>\$ 10,159,612.96</b>
9	Disbursements to Investors		-	-
10	Disbursements for Receivership Operations			529,842.69
10a	Disbursements to Receiver or Other Professionals	Payments to Attorneys, Accountants, Receiver	519,262.64	
10b	Business Asset and Operating Expenses	Operator payments, computer/server expenses, storage fees, royalty payments	7,105.43	
10c	Personal Asset Expenses		-	
10d	Investment Expenses		-	
10e	Third-Party Litigation Expenses		-	
10f	Tax Administrator Fees and Bonds		-	
10g	Federal and State Tax Expenses	US Treasury	3,474.62	
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		-	
	<b>Total Funds Disbursed</b>			<b>\$ 529,842.69</b>
13	<b>Ending Balance (March 31, 2024)</b>			<b>\$ 9,629,770.27</b>
14	Ending Balance of Fund - Net Assets			
14a	Cash & Cash Equivalents			\$ 9,629,770.27
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			
18b	the number of claims received from investors as a result of all orders since the inception of the Fund			



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

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

Standardized Fund Accounting Report

Reporting Period: 01/01/2024 to 03/31/2024

		Detail	Subtotal	Grand Total
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, §**

**Defendants, §**

**and §**

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

**Relief Defendants. §**

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

**ORDER APPROVING RECEIVER’S FEE APPLICATION FOR SERVICES PERFORMED  
BETWEEN JANUARY 1, 2024 AND MARCH 31, 2024, AND BRIEF IN SUPPORT**

Before the Court is the *Fee Application for Services Performed Between January 1, 2024 and March 31, 2024, and Brief in Support* (the “Application”),<sup>1</sup> 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 n/k/a Ahuja & Consultants, Inc. (“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.

---

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

2. The Receiver's fees incurred during the Application Period are approved on an interim basis and allowed in the amount of \$60,547.50.

3. Dykema's fees incurred during the Application Period are approved on an interim basis and allowed in the amount of \$127,115.95.

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

5. Jones's fees incurred during the Application Period are approved on an interim basis and allowed in the amount of \$10,985.00.

6. Palmour's fees incurred during the Application Period are approved on an interim basis and allowed in the amount of \$1,100.00.

7. Ahuja's fees incurred during the Application Period are approved on an interim basis and allowed in the amount of \$105,705.00.

8. Stretto's fees incurred during the Application Period are approved on an interim basis and allowed in the amount of \$26,807.25.

9. Dykema's expenses incurred during the Application Period in connection with services rendered on behalf of the Receiver are approved on an interim basis and allowed in the amount of \$10,546.60.

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 \$155.76.

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 \$121.80.

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.**

[\_\_\_\_\_], 2024.

\_\_\_\_\_  
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**

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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**

<b><u>TIMEKEEPER</u></b>	<b><u>HOURS</u></b>	<b><u>HOURLY RATE</u></b>	<b><u>TOTAL FEES</u></b>
Deborah D. Williamson	89.70 hours	\$675.00	\$60,547.50

**Dykema Gossett PLLC**

<b><u>TIMEKEEPER</u></b>	<b><u>TITLE</u></b>	<b><u>HOURS</u></b>	<b><u>HOURLY RATE</u></b>	<b><u>TOTAL FEES</u></b>
Cumming, Michael G.	Member	2.80 hours	\$648.00	\$1,814.40
Huffstickler, Patrick L.	Senior Counsel	27.90 hours	\$544.50	\$15,191.55
Behrends, Danielle Rushing	Member	219.40 hours	\$350.00	\$76,790.00

**Law Offices of Romero | Kozub**

<b><u>TIMEKEEPER</u></b>	<b><u>HOURS</u></b>	<b><u>HOURLY RATE</u></b>	<b><u>TOTAL FEES</u></b>
Rose L. Romero	2.00 hours	\$425.00	\$850.00

**Law Practice of Darrell R. Jones, PLLC**

<b><u>TIMEKEEPER</u></b>	<b><u>HOURS</u></b>	<b><u>HOURLY RATE</u></b>	<b><u>TOTAL FEES</u></b>
Darrell R. Jones	2.50 hours	\$325.00	\$812.50
Eric Hillerman	31.30 hours	\$325.00	\$10,172.50

**Vicki Palmour Consulting, LLC**

<b><u>TIMEKEEPER</u></b>	<b><u>HOURS</u></b>	<b><u>HOURLY RATE</u></b>	<b><u>TOTAL FEES</u></b>
Palmour, Vicki	4.50 hours	\$100.00	\$450.00
Amburn, Amy	4.50 hours	\$100.00	\$450.00
Gober, Tyna	2.00 hours	\$100.00	\$200.00



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

<b><u>TIMEKEEPER</u></b>	<b><u>HOURS</u></b>	<b><u>HOURLY RATE</u></b>	<b><u>TOTAL FEES</u></b>
Ahuja, Madhu	47.70 hours	\$325.00	\$15,502.50
Blevins, Jeanne-Marie	49.80 hours	\$120.00	\$5,976.00
Bremer, Carolyn	40.50 hours	\$325.00	\$13,162.50
Cecil, Anthony	76.70 hours	\$250.00	\$19,175.00
Huser, Stacey	79.50 hours	\$250.00	\$19,875.00
Peterson, Dawn	1.00 hours	\$95.00	\$95.00
Shetty, Divya	87.50 hours	\$250.00	\$21,875.00
Toeteberg-Harms, Natasha	55.80 hours	\$180.00	\$10,044.00

**Bankruptcy Management Solutions Inc. d/b/a Stretto**<sup>7</sup>

<b><u>TIMEKEEPER</u></b>	<b><u>HOURS</u></b>	<b><u>HOURLY RATE</u></b>	<b><u>TOTAL FEES</u></b>
Alcantar, Staphany	8.90 hours	\$40.00	\$356.00
Alcantar, Staphany	3.70 hours	\$97.50	\$360.75
Aragon, Pauline	0.20 hours	\$30.00	\$6.00
Aragon, Pauline	7.20 hours	\$65.00	\$468.00
Arellano, Monica	0.10 hours	\$30.00	\$3.00
Arellano, Monica	0.30 hours	\$65.00	\$19.50
Betance, Sheryl	7.30 hours	\$210.00	\$1,533.00
Chacaqua, Alberto	0.90 hours	\$130.00	\$117.00
Contreras, Keny	1.20 hours	\$30.00	\$36.00
Contreras, Keny	1.70 hours	\$65.00	\$110.50
Cruz, Jose	0.70 hours	\$65.00	\$45.50
Daversa, Aileen	0.20 hours	\$195.00	\$39.00
Delgado, Stephanie	1.40 hours	\$130.00	\$182.00
De Guzman, Jessie	0.10 hours	\$165.00	\$16.50
Ingram, Jacob	0.20 hours	\$65.00	\$13.00
IT Staff	10.10 hours	\$165.00	\$1,666.50
Litt, Lindsay	0.60 hours	\$30.00	\$18.00
Marshall, Aimee	0.70 hours	\$130.00	\$91.00
McElhinney, Dan	2.50 hours	\$210.00	\$525.00
Membrino, Melissa	0.60 hours	\$185.00	\$111.00
Morales, Stephanie	5.40 hours	\$40.00	\$216.00
Quang, Ricky	0.10 hours	\$65.00	\$6.50
Ramirez, Daniel	11.80 hours	\$130.00	\$1,534.00
Rodriguez, Naomi	1.30 hours	\$65.00	\$84.50
Saraceni, Robert	83.30 hours	\$185.00	\$15,410.50
Segura, Cassandra	0.10 hours	\$30.00	\$3.00
Streseman, Kevin	3.10 hours	\$185.00	\$573.50
Tondreault, Laura	5.70 hours	\$50.00	\$285.00
Wasserman, Kevin	22.30 hours	\$130.00	\$2,899.00
Wheeler, Charles	0.60 hours	\$130.00	\$78.00

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<sup>7</sup> Increased hourly rates for Stretto's professionals represent personnel promotions during the Application Period.

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

<b><u>Category Description</u></b>	<b><u>Total Billable Amount</u></b>	<b><u>Total Billable Time</u></b>
Case Administration	\$4,725.00	7.00 hours
Asset Analysis and Recovery	\$7,627.50	11.30 hours
Asset Disposition	\$3,375.00	5.00 hours
Business Operations	\$4,522.50	6.70 hours
Tax Issues	\$4,522.50	6.70 hours
Claims Administration and Objection	\$9,315.00	13.80 hours
Litigation Consulting	\$26,460.00	39.20 hours
<b>TOTAL</b>	<b>\$60,547.50</b>	<b>89.70 hours</b>

**Dykema Gossett PLLC**

<b><u>Category Description</u></b>	<b><u>Total Billable Amount</u></b>	<b><u>Total Billable Time</u></b>
Case Administration	\$27,755.00	79.30 hours
Asset Analysis and Recovery	\$20,896.55	44.20 hours
Asset Disposition	\$1,890.00	5.40 hours
Business Operations	\$17,185.00	49.10 hours
Tax Issues	\$8,849.40	22.90 hours
Claims Administration and Objection	\$34,790.00	99.40 hours
Status Reports	\$2,555.00	7.30 hours
Litigation Consulting	\$13,195.00	37.70 hours
<b>TOTAL</b>	<b>\$127,115.95</b>	<b>345.30 hours</b>

**Law Offices of Romero | Kozub**

<b><u>Category Description</u></b>	<b><u>Total Billable Amount</u></b>	<b><u>Total Billable Time</u></b>
Case Administration	\$382.50	0.90 hours
Claims Administration	\$212.50	0.50 hours
Status Reports	\$255.00	0.60 hours
<b>TOTAL</b>	<b>\$850.00</b>	<b>2.00 hours</b>

**Law Practice of Darrell R. Jones, PLLC**

<b><u>Category Description</u></b>	<b><u>Total Billable Amount</u></b>	<b><u>Total Billable Time</u></b>
Business Operations	\$10,822.50	33.30 hours
Status Reports	\$162.50	0.50 hours
<b>TOTAL</b>	<b>\$10,985.00</b>	<b>33.80 hours</b>

**Vicki Palmour Consulting, LLC n/k/a Ahuja & Consultants, Inc.**

<b><u>Category Description</u></b>	<b><u>Total Billable Amount</u></b>	<b><u>Total Billable Time</u></b>
Regulatory Work	\$650.00	6.50 hours
Accounting Work	\$450.00	4.50 hours
<b>TOTAL</b>	<b>\$1,100.00</b>	<b>11.00 hours</b>

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

<b><u>Category Description</u></b>	<b><u>Total Billable Amount</u></b>	<b><u>Total Billable Time</u></b>
Accounting/Auditing	\$25,551.00	128.10 hours
Tax Issues	\$34,482.50	126.70 hours
Forensic Accounting	\$183.70	183.70 hours
<b>TOTAL</b>	<b>\$105,705.00</b>	<b>438.50 hours</b>

**Bankruptcy Management Solutions Inc. d/b/a Stretto**

<b><u>Category Description</u></b>	<b><u>Total Billable Amount</u></b>	<b><u>Total Billable Time</u></b>
Case Administration	\$18,418.00	127.60 hours
Claims Administration and Objections	\$8,389.25	54.70 hours
<b>TOTAL</b>	<b>\$26,807.25</b>	<b>182.30 hours</b>

**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**

APRIL 24, 2024  
MATTER #: 122686.000001  
INVOICE #: 3582558

*FOR PROFESSIONAL SERVICES RENDERED*

**RE: RECEIVER'S TIME**

FEES	\$	34,830.00
<b>INVOICE TOTAL</b>	<b>\$</b>	<b>34,830.00</b>



DEBORAH D WILLIAMSON  
DEBORAH WILLIAMSON

MATTER #: 122686.000001  
INVOICE #: 3582558  
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APRIL 24, 2024

**RE: RECEIVER'S TIME**

DATE	ID	DESCRIPTION	TASK	HOURS	AMOUNT
01/02/24	DDW	REVIEW OF NOTICE OF ENTRY OF ASSIGNMENT ORDER REGARDING D. UNDERWOOD; DRAFT RESPONSIVE LETTER.	B110	1.00	675.00
01/02/24	DDW	CONFERENCE AND EMAILS REGARDING INSURANCE.	B210	0.50	337.50
01/02/24	DDW	REVIEW AND REVISE PROPOSED FORM OF MOTION TO APPROVE SETTLEMENT AGREEMENT INCLUDING EVALUATION OF SIMILAR MOTIONS IN OTHER CASES, CASE CITATIONS AND FACTUAL BACKGROUND; DRAFT AND RESPOND TO EMAILS REGARDING SAME INCLUDING ADDITIONAL POTENTIAL TERMS.	BT160	5.30	3,577.50
01/02/24	DDW	REVIEW OF UPDATE REGARDING VALVERDE/CROCKETT.	B210	0.30	202.50
01/03/24	DDW	CONFERENCE AND EMAILS REGARDING SETTLEMENT DISCUSSIONS.	BT160	0.40	270.00
01/03/24	DDW	REVIEW OF INFORMATION PROVIDED REGARDING ASSIGNMENT ORDER RE: D. UNDERWOOD.	B110	0.40	270.00
01/03/24	DDW	REVIEW AND REVISE PLEADING REGARDING BAHAMAS PROPERTY.	B120	4.60	3,105.00
01/04/24	DDW	CONTINUE REVISIONS TO BAHAMAS PLEADING TO INCORPORATE INFORMATION FROM TAX RETURNS, PLEADINGS, FILINGS AND OTHER INFORMATION.	B120	3.40	2,295.00
01/04/24	DDW	REVIEW OF RECENT FIFTH CIRCUIT AND OTHER DECISIONS AND ARTICLES ON BAR ORDERS AND SETTLEMENTS IN RECEIVERSHIPS; DRAFT AND RESPOND TO EMAILS REGARDING SAME.	BT160	1.80	1,215.00
01/05/24	DDW	CONTINUE REVISING PLEADINGS REGARDING BAHAMAS PROPERTY.	B120	2.20	1,485.00
01/08/24	DDW	PREPARE FOR AND ATTEND CONFERENCE REGARDING STRUCTURE OF PROPOSED SETTLEMENT; REVIEW OF SIMILAR AGREEMENTS.	BT160	1.70	1,147.50
01/08/24	DDW	REVIEW AND APPROVE DEPOSITS, SETTLEMENTS, AND TRANSFERS VIA WIRE OR CHECKS.	BT160	0.70	472.50
01/08/24	DDW	BRIEF REVIEW OF CORRESPONDENCE FROM SOCIAL SECURITY ADMINISTRATION AND THE TEXAS RAILROAD COMMISSION; DRAFT AND RESPOND TO EMAILS REGARDING SAME.	B210	0.50	337.50
01/08/24	DDW	CONFERENCES REGARDING BAHAMAS PLEADINGS.	B120	0.40	270.00



DEBORAH D WILLIAMSON  
DEBORAH WILLIAMSON

MATTER #: 122686.000001  
INVOICE #: 3582558  
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APRIL 24, 2024

DATE	ID	DESCRIPTION	TASK	HOURS	AMOUNT
01/08/24	DDW	REVIEW AND APPROVE COMMUNICATIONS WITH INVESTORS.	B110	0.30	202.50
01/08/24	DDW	REVIEW AND RESPOND TO COMMUNICATIONS REGARDING CROCKETT/VAL VERDE.	B110	0.30	202.50
01/08/24	DDW	REVIEW AND RESPOND TO COMMUNICATIONS REGARDING SOCIAL SECURITY ADMINISTRATION AND OTHER CLAIMS ISSUES.	B310	0.30	202.50
01/08/24	DDW	REVIEW AND APPROVE PAYMENTS, DEPOSITS; CONFERENCES REGARDING SAME.	B210	0.40	270.00
01/09/24	DDW	PREPARE FOR AND ATTEND CONFERENCE ON TAX PREPARATION AND OTHER ISSUES.	B240	0.70	472.50
01/09/24	DDW	CONTINUE DRAFTING PLEADINGS REGARDING SETTLEMENT INCLUDING REVIEW OF RELATED DECISIONS; REVIEW AND RESPOND TO EMAILS REGARDING SAME.	BT160	4.10	2,767.50
01/09/24	DDW	REVIEW AND APPROVE PAYMENTS AND DEPOSITS.	B210	0.30	202.50
01/09/24	DDW	REVIEW OF REPORT REGARDING VOGT AUCTION.	B130	0.20	135.00
01/10/24	DDW	PREPARE FOR AND ATTEND CONFERENCE WITH OFFICE OF THE TEXAS ATTORNEY GENERAL.	BT160	1.20	810.00
01/10/24	DDW	REVIEW AND REVISE PROPOSED MOTION TO APPROVE SETTLEMENT TO INCORPORATE REQUESTED PROVISIONS.	BT160	1.10	742.50
01/10/24	DDW	TELEPHONE CALL WITH INVESTOR AND EMAILS REGARDING CLAIMS.	B110	1.90	1,282.50
01/11/24	DDW	DRAFT AND REVISE PROPOSED SETTLEMENT AGREEMENT.	BT160	3.10	2,092.50
01/12/24	DDW	REVIEW OF SOME DOCUMENTATION RELATED TO SETTLEMENT.	BT160	1.30	877.50
01/15/24	DDW	REVIEW AND REVISE SETTLEMENT AGREEMENT; DRAFT AND RESPOND TO EMAILS REGARDING SAME.	BT160	1.60	1,080.00
01/16/24	DDW	REVIEW AND APPROVE PAYMENTS AND DEPOSITS.	B210	0.10	67.50
01/16/24	DDW	CONTINUE DRAFTING DOCUMENTS RELATED TO POTENTIAL SETTLEMENT INCLUDING PROPOSED ORDERS.	BT160	1.90	1,282.50
01/17/24	DDW	PREPARE FOR ATTEND MEETING WITH TEXAS OFFICE OF THE ATTORNEY GENERAL; REVIEW OF INFORMATION TO BE SENT IN RESPONSE.	BT160	0.90	607.50
01/17/24	DDW	REVIEW AND APPROVE PAYMENTS AND DEPOSITS.	B210	0.20	135.00
01/18/24	DDW	CONFERENCE WITH AHUJA AND CLARK REGARDING INFORMATION REQUESTED TO AID SETTLEMENT DISCUSSIONS.	BT160	0.40	270.00
01/18/24	DDW	REVIEW OF PROPOSED REVISIONS TO SETTLEMENT	BT160	0.90	607.50





DEBORAH D WILLIAMSON  
DEBORAH WILLIAMSON

MATTER #: 122686.000001  
INVOICE #: 3582558  
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APRIL 24, 2024

DATE	ID	DESCRIPTION	TASK	HOURS	AMOUNT
		AGREEMENT AND CONFERENCE REGARDING RELATED MOTION AND PROPOSED ORDERS.			
01/18/24	DDW	REVIEW OF UPDATED CLAIMS REPORT.	B310	0.40	270.00
01/22/24	DDW	PREPARE FOR AND ATTEND CONFERENCE REGARDING DISPUTED CLAIMS INCLUDING REVIEW OF AHUJA AND CLARK ANALYSIS.	B310	0.90	607.50
01/22/24	DDW	CONFERENCE REGARDING FINANCIAL INFORMATION REQUESTED BY TEXAS RAILROAD COMMISSION.	BT160	0.70	472.50
01/22/24	DDW	REVIEW OF IRS NOTICE REGARDING CLOSING OF CERTAIN FILES.	B240	0.20	135.00
01/23/24	DDW	CONFERENCE AND EMAILS WITH MS. BEHREND'S REGARDING VARIOUS ISSUES.	B110	0.30	202.50
01/25/24	DDW	REVIEW OF UPDATE FROM SDMB REGARDING VAL VERDE/CROCKETT; DRAFT AND RESPOND TO EMAILS REGARDING SAME.	B210	0.40	270.00
01/26/24	DDW	PREPARE FOR AND ATTEND MEETING WITH AHUJA AND CLARK IN PREPARATION FOR DISCUSSIONS WITH TEXAS RAILROAD COMMISSION.	BT160	1.00	675.00
01/26/24	DDW	REVIEW AND REVISE PROPOSED CORRESPONDENCE WITH TEXAS ATTORNEY GENERAL.	BT160	0.40	270.00
01/26/24	DDW	REVIEW OF CORRESPONDENCE FROM COUNSEL FOR INVESTOR.	B110	0.20	135.00
01/26/24	DDW	REVIEW OF PROPOSED SETTLEMENT AGREEMENT; REVIEW AND RESPOND TO EMAILS REGARDING SAME.	BT160	0.70	472.50
01/29/24	DDW	APPROVE PAYMENTS.	B210	0.10	67.50
01/30/24	DDW	CONFERENCE REGARDING SETTLEMENT OFFERS.	BT160	0.50	337.50
01/30/24	DDW	REVIEW AND APPROVE EXTENSION OF TOLLING AGREEMENT.	BT160	0.20	135.00
01/30/24	DDW	REVIEW AND RESPOND TO EMAILS REGARDING SETTLEMENT PROCESS AND PLEADINGS.	BT160	0.50	337.50
01/31/24	DDW	REVIEW OF CORRESPONDENCE REGARDING DISTRIBUTIONS AND CONFERENCE WITH MS. BEHREND'S REGARDING SAME.	B110	0.30	202.50
01/31/24	DDW	ADDRESS PAYMENTS AND OTHER ADMINISTRATIVE ISSUES.	B210	0.40	270.00
		<b>TOTAL</b>		<b>51.60</b>	<b>\$34,830.00</b>



DEBORAH D WILLIAMSON  
DEBORAH WILLIAMSON

MATTER #: 122686.000001  
INVOICE #: 3582558  
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APRIL 24, 2024

**BILLING SUMMARY**

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



DEBORAH D WILLIAMSON  
DEBORAH WILLIAMSON

MATTER #: 122686.000001  
INVOICE #: 3582558  
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APRIL 24, 2024

**TASK SUMMARY**

<b>TASK</b>	<b>TASK DESCRIPTION</b>	<b>HOURS</b>	<b>AMOUNT</b>
B110	CASE ADMINISTRATION	4.70	3,172.50
B120	ASSET ANALYSIS AND RECOVERY	10.60	7,155.00
B130	ASSET DISPOSITION	0.20	135.00
B210	BUSINESS OPERATIONS	3.20	2,160.00
B240	TAX ISSUES	0.90	607.50
B310	CLAIMS ADMINISTRATION & OBJECT	1.60	1,080.00
BT160	LITIGATION CONSULTING	30.40	20,520.00
	<b>TOTAL</b>	<b>51.60</b>	<b>34,830.00</b>



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

**DUE UPON RECEIPT**

APRIL 24, 2024  
MATTER #: 122686.000001  
INVOICE #: 3582557

*FOR PROFESSIONAL SERVICES RENDERED*

**RE: RECEIVER'S TIME**

FEES	\$	7,965.00
<b>INVOICE TOTAL</b>	<b>\$</b>	<b>7,965.00</b>



DEBORAH D WILLIAMSON  
DEBORAH WILLIAMSON

MATTER #: 122686.000001  
INVOICE #: 3582557  
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APRIL 24, 2024

**RE: RECEIVER'S TIME**

DATE	ID	DESCRIPTION	TASK	HOURS	AMOUNT
02/01/24	DDW	REVIEW AND RESPOND REGARDING TEXAS RAILROAD COMMISSION.	B210	0.40	270.00
02/05/24	DDW	PREPARE FOR AND ATTEND CONFERENCE REGARDING PLEADINGS RELATED TO SETTLEMENT, INCLUDING REVIEW OF PLEADINGS.	BT160	1.10	742.50
02/06/24	DDW	REVIEW AND REVISE PROPOSED STIPULATION WITH TEXAS RAIL ROAD COMMISSION.	B310	0.90	607.50
02/08/24	DDW	REVIEW AND RESPOND TO EMAILS REGARDING RAILROAD COMMISSION.	B210	0.40	270.00
02/12/24	DDW	REVIEW OF CLAIMS REPORT; DRAFT AND RESPOND TO EMAILS REGARDING SAME.	B310	0.60	405.00
02/13/24	DDW	REVIEW AND APPROVE RESOLUTION WITH ENERGYNET.	B210	0.20	135.00
02/13/24	DDW	REVIEW AND APPROVE PAYMENTS.	B210	0.10	67.50
02/15/24	DDW	REVIEW OF DEMAND FROM BONDING COMPANY; DRAFT AND RESPOND TO EMAILS REGARDING SAME.	B110	0.40	270.00
02/16/24	DDW	PREPARE FOR AND ATTEND MEETING WITH SEC REGARDING CLAIMS; CONFERENCE REGARDING SAME.	B310	0.50	337.50
02/16/24	DDW	BRIEF REVIEW OF COMMUNICATIONS FROM TEXAS RAILROAD COMMISSION; CONFERENCE REGARDING SAME.	B210	0.40	270.00
02/21/24	DDW	REVIEW AND RESPOND TO INQUIRIES REGARDING ABANDONED WELLS.	B210	0.20	135.00
02/21/24	DDW	REVIEW AND RESPOND TO EMAILS REGARDING CLAIMS DISTRIBUTION.	B310	0.30	202.50
02/21/24	DDW	PREPARE FOR AND ATTEND TELEPHONE CALL REGARDING LITIGATION SETTLEMENT DOCUMENTS, INCLUDING REVIEW OF SAME.	BT160	1.10	742.50
02/21/24	DDW	REVIEW CLAIMS AND APPROVE RESPONSE REGARDING LIENS REGARDING SDMB.	B210	0.40	270.00
02/21/24	DDW	REVIEW LITIGATION ON AND APPROVE SETTLEMENTS.	BT160	0.30	202.50
02/26/24	DDW	REVIEW AND APPROVE PAYMENTS.	B210	0.30	202.50
02/26/24	DDW	REVIEW AND APPROVE SETTLEMENT DOCUMENTS; DRAFT AND RESPOND TO EMAILS REGARDING SAME.	BT160	0.60	405.00



DEBORAH D WILLIAMSON  
DEBORAH WILLIAMSON

MATTER #: 122686.000001  
INVOICE #: 3582557  
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APRIL 24, 2024

DATE	ID	DESCRIPTION	TASK	HOURS	AMOUNT
02/26/24	DDW	CONFERENCE REGARDING COMMUNICATION FROM INVESTOR REGARDING ALLOCATION OF EXPENSES.	B110	0.40	270.00
02/26/24	DDW	REVIEW OF UPDATE REGARDING CLAIMS ANALYSIS.	B310	0.30	202.50
02/26/24	DDW	REVIEW OF UPDATE REGARDING VAL VERDE/CROCKETT.	B210	0.20	135.00
02/27/24	DDW	PREPARE FOR AND ATTEND CONFERENCE WITH AHUJA & CONSULTANTS REGARDING DISTRIBUTIONS METHODOLOGY.	B310	0.60	405.00
02/27/24	DDW	REVIEW AND REVISE CORRESPONDENCE REGARDING CLAIM AND CONFERENCES REGARDING SAME.	B310	0.50	337.50
02/29/24	DDW	REVIEW OF UPDATE REGARDING VAL VERDE/CROCKETT AND RELATED INFORMATION REGARDING CLAIMS AND DEMANDS.	B210	0.50	337.50
02/29/24	DDW	CONFERENCES REGARDING DRAFT MOTION REGARDING BAHAMAS PROPERTY.	BT160	0.60	405.00
02/29/24	DDW	CONFERENCES REGARDING RESPONSES TO CLAIMS ASSERTING INTEREST AND RELATED DEMAND LETTERS.	B310	0.50	337.50
		<b>TOTAL</b>		<b>11.80</b>	<b>\$7,965.00</b>



DEBORAH D WILLIAMSON  
DEBORAH WILLIAMSON

MATTER #: 122686.000001  
INVOICE #: 3582557  
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APRIL 24, 2024

**BILLING SUMMARY**

<b>ID</b>	<b>TIMEKEEPER</b>	<b>TITLE</b>	<b>HOURS</b>	<b>RATE</b>	<b>AMOUNT</b>
DDW	DEBORAH WILLIAMSON	MEMBER	11.80	675.00	7,965.00
	<b>TOTAL</b>		<b>11.80</b>		<b>\$7,965.00</b>



DEBORAH D WILLIAMSON  
DEBORAH WILLIAMSON

MATTER #: 122686.000001  
INVOICE #: 3582557  
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APRIL 24, 2024

**TASK SUMMARY**

<b>TASK</b>	<b>TASK DESCRIPTION</b>	<b>HOURS</b>	<b>AMOUNT</b>
B110	CASE ADMINISTRATION	0.80	540.00
B210	BUSINESS OPERATIONS	3.10	2,092.50
B310	CLAIMS ADMINISTRATION & OBJECT	4.20	2,835.00
BT160	LITIGATION CONSULTING	3.70	2,497.50
	<b>TOTAL</b>	<b>11.80</b>	<b>7,965.00</b>





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

**DUE UPON RECEIPT**

APRIL 24, 2024  
MATTER #: 122686.000001  
INVOICE #: 3582556

*FOR PROFESSIONAL SERVICES RENDERED*

**RE: RECEIVER'S TIME**

FEES	\$	17,752.50
<b>INVOICE TOTAL</b>	<b>\$</b>	<b>17,752.50</b>



DEBORAH D WILLIAMSON  
DEBORAH WILLIAMSON

MATTER #: 122686.000001  
INVOICE #: 3582556  
PAGE 2

APRIL 24, 2024

**RE: RECEIVER'S TIME**

DATE	ID	DESCRIPTION	TASK	HOURS	AMOUNT
03/01/24	DDW	PREPARE FOR AND ATTEND CONFERENCE REGARDING TRACING OF FUNDS, INCLUDING REVIEW OF ANALYSIS.	B120	0.40	270.00
03/01/24	DDW	REVIEW AND RESPOND TO EMAILS REGARDING ABANDONED WELLS.	B210	0.20	135.00
03/04/24	DDW	REVIEW AND REVISE TWO PROPOSED SETTLEMENTS AND CONFERENCES REGARDING SAME.	BT160	0.90	607.50
03/11/24	DDW	REVIEW OF SETTLEMENT AGREEMENT AND CONFERENCE REGARDING SAME.	BT160	0.60	405.00
03/11/24	DDW	CONFERENCES AND EMAILS REGARDING ISSUES RELATED TO AMENDED OR OTHER CLAIMS.	B310	0.50	337.50
03/11/24	DDW	REVIEW OF PROPOSED STIPULATION WITH TEXAS RAILROAD COMMISSION; CONFERENCE REGARDING SAME.	B310	0.50	337.50
03/12/24	DDW	CONFERENCES REGARDING CLAIMS AND POTENTIAL OBJECTIONS.	B310	0.40	270.00
03/12/24	DDW	REVIEW OF ISSUES REGARDING FEDERAL TAX RETURNS.	B240	0.40	270.00
03/12/24	DDW	BRIEF REVIEW OF TRACING OF PAYMENTS.	B120	0.30	202.50
03/13/24	DDW	PREPARE FOR AND ATTEND MEETING WITH SEC.	B110	0.80	540.00
03/13/24	DDW	REVIEW AND APPROVE PAYMENTS.	B210	0.20	135.00
03/13/24	DDW	REVIEW AND APPROVE CORRESPONDENCE REGARDING CLAIMS OBJECTIONS.	B310	0.40	270.00
03/14/24	DDW	REVIEW AND APPROVE COMMUNICATIONS REGARDING CLAIMS OBJECTIONS.	B310	0.50	337.50
03/14/24	DDW	REVIEW AND APPROVE PROPOSED STIPULATION WITH TEXAS RAILROAD COMMISSION.	B310	0.40	270.00
03/14/24	DDW	REVIEW AND RESPOND TO ISSUES REGARDING INCOMPLETE TAX INFORMATION.	B240	0.40	270.00
03/15/24	DDW	REVIEW AND REVISE LETTER TO IRS.	B240	0.40	270.00
03/18/24	DDW	CONFERENCE REGARDING EMPLOYMENT-RELATED TAX RETURNS; REVIEW AND APPROVE SAME AND CORRESPONDENCE.	B240	1.10	742.50
03/18/24	DDW	REVIEW AND REVISE PROPOSED LETTERS TO INVESTOR REGARDING OBJECTION TO CLAIM.	B310	0.50	337.50



DEBORAH D WILLIAMSON  
DEBORAH WILLIAMSON

MATTER #: 122686.000001  
INVOICE #: 3582556  
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APRIL 24, 2024

DATE	ID	DESCRIPTION	TASK	HOURS	AMOUNT
03/19/24	DDW	REVIEW AND REVISE RESPONSES TO CLAIMS AND OBJECTIONS.	B310	0.50	337.50
03/19/24	DDW	PREPARE FOR AND ATTEND CONFERENCE WITH SEC.	B110	0.70	472.50
03/19/24	DDW	PREPARE FOR AND ATTEND CONFERENCE ON TAX ISSUES.	B240	1.20	810.00
03/22/24	DDW	REVIEW OF VARIOUS ISSUES RELATED TO CLAIMS AND POTENTIAL OBJECTIONS.	B310	0.50	337.50
03/25/24	DDW	PREPARE FOR AND ATTEND MEETING REGARDING 2023 TAX RETURNS.	B240	2.00	1,350.00
03/25/24	DDW	CONFERENCES REGARDING CLAIMS AND OBJECTIONS INCLUDING REVIEW OF NOTICES AND RESPONSES.	B310	1.10	742.50
03/25/24	DDW	REVIEW OF PROPOSED SETTLEMENT DOCUMENTS AND RESPOND REGARDING PROPOSED REVISIONS.	BT160	0.90	607.50
03/26/24	DDW	PREPARE FOR AND ATTEND CONFERENCE REGARDING SETTLEMENT PLEADINGS AND AGREEMENT.	BT160	0.90	607.50
03/26/24	DDW	REVIEW AND APPROVE ALLOWANCE, PAYMENT AND OBJECTIONS TO CLAIMS AND CONFERENCES REGARDING SAME.	B310	1.00	675.00
03/26/24	DDW	DRAFT DISTRIBUTION MOTION.	B130	2.70	1,822.50
03/27/24	DDW	REVIEW AND APPROVE RESPONSES TO VARIOUS CLAIMS; CONFERENCES REGARDING SAME.	B310	1.10	742.50
03/27/24	DDW	REVISE DISTRIBUTION MOTION CONFERENCES REGARDING SAME.	B130	2.10	1,417.50
03/27/24	DDW	REVIEW AND APPROVE SETTLEMENT MOTION AND PROPOSED CHANGES; CONFERENCES AND EMAILS REGARDING SAME.	BT160	0.90	607.50
03/28/24	DDW	REVISE AND RESPOND TO REQUEST TO AMEND SETTLEMENT AGREEMENT, NOTICE AND FILING ISSUES.	BT160	0.90	607.50
03/28/24	DDW	CONFERENCE AND EMAILS REGARDING TAX RETURNS.	B240	0.30	202.50
03/29/24	DDW	REVIEW OF UPDATED CLAIMS REPORTS.	B310	0.60	405.00
		<b>TOTAL</b>		<b>26.30</b>	<b>\$17,752.50</b>



DEBORAH D WILLIAMSON  
DEBORAH WILLIAMSON

MATTER #: 122686.000001  
INVOICE #: 3582556  
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APRIL 24, 2024

**BILLING SUMMARY**

<b>ID</b>	<b>TIMEKEEPER</b>	<b>TITLE</b>	<b>HOURS</b>	<b>RATE</b>	<b>AMOUNT</b>
DDW	DEBORAH WILLIAMSON	MEMBER	26.30	675.00	17,752.50
	<b>TOTAL</b>		<b>26.30</b>		<b>\$17,752.50</b>



DEBORAH D WILLIAMSON  
DEBORAH WILLIAMSON

MATTER #: 122686.000001  
INVOICE #: 3582556  
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APRIL 24, 2024

**TASK SUMMARY**

<b>TASK</b>	<b>TASK DESCRIPTION</b>	<b>HOURS</b>	<b>AMOUNT</b>
B110	CASE ADMINISTRATION	1.50	1,012.50
B120	ASSET ANALYSIS AND RECOVERY	0.70	472.50
B130	ASSET DISPOSITION	4.80	3,240.00
B210	BUSINESS OPERATIONS	0.40	270.00
B240	TAX ISSUES	5.80	3,915.00
B310	CLAIMS ADMINISTRATION & OBJECT	8.00	5,400.00
BT160	LITIGATION CONSULTING	5.10	3,442.50
	<b>TOTAL</b>	<b>26.30</b>	<b>17,752.50</b>



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

**DUE UPON RECEIPT**

APRIL 24, 2024  
MATTER #: 122686.000002  
INVOICE #: 3582555

*FOR PROFESSIONAL SERVICES RENDERED*

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

FEES	\$	42,866.30
DISBURSEMENTS		6,742.80
<b>INVOICE TOTAL</b>	<b>\$</b>	<b>49,609.10</b>



DEBORAH D WILLIAMSON  
DEBORAH WILLIAMSON

MATTER #: 122686.000002  
INVOICE #: 3582555  
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APRIL 24, 2024

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

DATE	ID	DESCRIPTION	TASK	HOURS	AMOUNT
01/02/24	DNR	CORRESPONDENCE WITH OIL AND GAS COUNSEL REGARDING CHECK ISSUANCE.	B210	0.40	140.00
01/02/24	DNR	CORRESPONDENCE WITH DEBORAH D. WILLIAMSON AND REID COLLINS REGARDING SETTLEMENT AGREEMENT TERMS.	BT160	0.30	105.00
01/02/24	DNR	CORRESPONDENCE WITH COMPLIANCE TEAM REGARDING INSURANCE COVERAGE.	B210	0.20	70.00
01/03/24	MGC	REVIEW EMAILS REGARDING SETTLEMENT TERMS; CONSIDERATION OF RELATED TAX MATTERS; REVIEW OF STANFORD SETTLEMENT AGREEMENT AND PROPOSED MOTION TO APPROVE SETTLEMENT AGREEMENT; PREPARATION OF TAX PROVISIONS FOR SETTLEMENT AND MOTION FOR APPROVAL OF SETTLEMENT AGREEMENT; SUPPLEMENTAL TAX RESEARCH.	B240	2.30	1,490.40
01/03/24	PLH	REVIEW VOICEMAIL AND E-MAIL AND ATTACHMENTS FROM MS. HALLEN REGARDING INFORMATION FROM HER CLIENT WITH RESPECT TO POTENTIAL RESOLUTION OF TIEP INVESTOR CLAIMS ASSERTED BY THE RECEIVER.	B120	0.70	381.15
01/03/24	PLH	REVIEW VOICEMAIL FROM TIEP INVESTOR AND ADDRESS CLAIMS WITH RESPECT TO SUCH TIEP INVESTOR.	B120	0.20	108.90
01/03/24	PLH	REVIEW EMAIL AND INFORMATION FROM MR. CHARPENTIER AND TELEPHONE CONFERENCE MR. CHARPENTIER ON SAME RELATED TO CLAIMS AGAINST HIS TIEP CLIENT.	B120	0.60	326.70
01/04/24	PLH	TELEPHONE CONFERENCE REGARDING CLAIMS AGAINST POTENTIAL TIEP INVESTOR CLIENT.	B120	0.20	108.90
01/04/24	PLH	REVIEW EMAIL AND ATTACHED CORRESPONDENCE AND DOCUMENTATION REGARDING AGAINST AND POTENTIAL SETTLEMENT OF CLAIMS AGAINST HIS TIEP CLIENTS.	B120	0.80	435.60
01/04/24	DNR	CORRESPONDENCE WITH DEBORAH D. WILLIAMSON AND OIL AND GAS COUNSEL REGARDING ESCHEATMENT AND NEXT STEPS.	B210	0.40	140.00
01/04/24	DNR	RECEIVE AND REVIEW SUSPENSE LISTS AND DETAIL FROM VICKI PALMOUR CONSULTING.	B210	0.50	175.00
01/05/24	PLH	REVIEW AND RESPOND TO E-MAILS OF TIEP INVESTOR ON FINALIZATION OF SETTLEMENT OF TIEP INVESTOR CLIENT CLAIMS.	B120	0.30	163.35



DEBORAH D WILLIAMSON  
DEBORAH WILLIAMSON

MATTER #: 122686.000002  
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APRIL 24, 2024

DATE	ID	DESCRIPTION	TASK	HOURS	AMOUNT
01/05/24	PLH	REVIEW INFORMATION AND DOCUMENTS FROM TIEP INVESTOR WITH RESPECT TO CLAIMS AND POTENTIAL SETTLEMENT.	B120	0.40	217.80
01/05/24	PLH	REVIEW E-MAIL AND FINANCIAL INFORMATION FROM TIEP INVESTOR IN CONNECTION WITH POTENTIAL SETTLEMENT.	B120	0.30	163.35
01/05/24	PLH	REVIEW E-MAIL AND CORRESPONDENCE FROM MR. PORTEOUS REGARDING CLAIMS AND SETTLEMENT OF THOSE CLAIMS AGAINST 5 TIEP INVESTOR CLIENTS AND RESPOND TO SAME.	B120	0.50	272.25
01/05/24	PLH	REVIEW E-MAIL AND CORRESPONDENCE FROM MR. FABER ON CLAIMS AGAINST HIS TIEP INVESTOR CLIENTS AND POTENTIAL SETTLEMENT.	B120	0.40	217.80
01/05/24	PLH	REVIEW CASE LAW CITED IN CORRESPONDENCE FROM TIEP INVESTORS' COUNSEL RELATED TO CLAIMS ASSERTED IN DEMAND LETTERS IN CONNECTION WITH SETTLEMENT OFFER.	B120	0.80	435.60
01/05/24	PLH	REVIEW EMAIL AND ATTACHMENTS OF MR. CORNISH ON SETTLEMENT OF HIS CLIENTS' TIEP INVESTOR CLAIMS AND EMAIL MS. BEHREND ON WIRE PAYMENT RELATED TO SAME.	B120	0.30	163.35
01/05/24	DNR	REVIEW EMAILS FROM DEBORAH D. WILLIAMSON AND REID COLLINS REGARDING SETTLEMENT UPDATE WITH FORMER PROFESSIONALS.	BT160	0.30	105.00
01/08/24	DNR	CORRESPONDENCE WITH VICKI PALMOUR CONSULTING REGARDING COMPLIANCE CALLS.	B210	0.20	70.00
01/08/24	DNR	CORRESPONDENCE WITH AHUJA & CLARK AND DEBORAH D. WILLIAMSON REGARDING TIEP SETTLEMENT FUNDS AND TAX TREATMENT.	B240	0.50	175.00
01/08/24	DNR	CORRESPONDENCE WITH STRETTO REGARDING RETURNED MAIL AND REVIEW OF SPREADSHEETS REGARDING SAME.	B110	0.40	140.00
01/08/24	DNR	CORRESPONDENCE TO AHUJA & CLARK REGARDING IRS LETTER.	B240	0.10	35.00
01/08/24	DNR	CORRESPONDENCE TO AHUJA & CLARK REGARDING SOCIAL SECURITY ADMINISTRATION LETTER RECEIVED.	B240	0.10	35.00
01/08/24	DNR	RECEIVE AND PROCESS RECEIVER'S MAIL.	B210	1.40	490.00
01/08/24	DNR	CORRESPONDENCE FROM AHUJA & CLARK REGARDING QUARTERLY REPORT.	BT155	0.10	35.00
01/08/24	DNR	RECEIVE AND REVIEW DECEMBER 2023 STATEMENTS FROM IBC BANK; SEND TO AHUJA & CLARK.	B210	0.40	140.00
01/08/24	DNR	CORRESPONDENCE WITH OIL AND GAS COUNSEL AND VICKI PALMOUR CONSULTING REGARDING RETURNED FINAL	B210	0.20	70.00





DEBORAH D WILLIAMSON  
DEBORAH WILLIAMSON

MATTER #: 122686.000002  
INVOICE #: 3582555  
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APRIL 24, 2024

DATE	ID	DESCRIPTION	TASK	HOURS	AMOUNT
		ROYALTY PAYMENT.			
01/08/24	DNR	RECEIVE AND REVIEW LATEST CLAIMS REPORT FROM STRETTO.	B310	0.30	105.00
01/08/24	DNR	CORRESPONDENCE TO STRETTO REGARDING INVESTOR SUBMISSION INQUIRY.	B310	0.10	35.00
01/08/24	DNR	TELEPHONE CONFERENCE WITH VICKI PALMOUR CONSULTING REGARDING PURCHASER INFORMATION REGARDING SCHLEICHER COUNTY.	B210	0.10	35.00
01/08/24	DNR	CORRESPONDENCE FROM ROYALTY OWNER COUNSEL REGARDING PAYMENTS.	B110	0.10	35.00
01/08/24	DNR	CORRESPONDENCE TO VICKI PALMOUR CONSULTING REGARDING RAILROAD COMMISSION DOCKETS.	B210	0.10	35.00
01/08/24	DNR	CORRESPONDENCE WITH OIL AND GAS COUNSEL REGARDING PREP FOR CALL WITH OFFICE OF THE ATTORNEY GENERAL.	B210	0.20	70.00
01/08/24	DNR	CALL WITH VICKI PALMOUR CONSULTING REGARDING ROYALTY PAYMENTS AND FARMOUT ITEMS.	B210	0.40	140.00
01/08/24	DNR	CORRESPONDENCE WITH PATRICK L. HUFFSTICKLER REGARDING TIEP SETTLEMENT FUNDS RECEIVED.	BT160	0.30	105.00
01/08/24	DNR	CORRESPONDENCE WITH WOLFEPAK REGARDING RENEWAL ACCESS.	B210	0.20	70.00
01/08/24	DNR	RECEIVE INFORMATION FROM GENERAL LAND OFFICE REGARDING STATEMENT OF ACCOUNTS; CORRESPONDENCE WITH OIL AND GAS COUNSEL AND VICKI PALMOUR CONSULTING REGARDING ISSUES ON SAME.	B210	0.60	210.00
01/08/24	DNR	SEND RAILROAD COMMISSION MAIL RECEIVED TO COMPLIANCE TEAM.	B210	0.20	70.00
01/08/24	DNR	CORRESPONDENCE WITH TIEP INVESTOR REGARDING SETTLEMENT FUND ISSUES AND REISSUANCE OF CHECK TO RECEIVER.	B110	0.40	140.00
01/08/24	DNR	CORRESPONDENCE WITH DEBORAH D. WILLIAMSON REGARDING SERVICE OF CLAIMS PACKAGE.	B310	0.20	70.00
01/08/24	DNR	RECEIVE AND REVIEW WESTERN ALLIANCE BANK'S DECEMBER 2023 STATEMENT; SEND TO AHUJA & CLARK.	B210	0.30	105.00
01/08/24	DNR	CALL REGARDING SETTLEMENT AGREEMENT.	BT160	0.30	105.00
01/08/24	DNR	REVIEW AND RESPOND TO INVESTOR INQUIRIES.	B110	1.00	350.00
01/08/24	DNR	CORRESPONDENCE WITH AHUJA & CONSULTING REGARDING INVESTOR INQUIRY REGARDING TRANSACTION SCHEDULE.	B310	0.30	105.00



DEBORAH D WILLIAMSON  
DEBORAH WILLIAMSON

MATTER #: 122686.000002  
INVOICE #: 3582555  
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APRIL 24, 2024

DATE	ID	DESCRIPTION	TASK	HOURS	AMOUNT
01/08/24	DNR	DRAFT AND SEND RESPONSE TO ROYALTY OWNER COUNSEL.	B110	0.30	105.00
01/08/24	DNR	DRAFT AND SEND LETTER TO TIEP INVESTOR REGARDING REISSUANCE OF CHECK AND RETURN OF VOIDED CHECK.	B110	0.20	70.00
01/08/24	DNR	CORRESPONDENCE WITH VENDOR COUNSEL REGARDING SDMB'S FAILURE TO PAY AND ASSERTION OF LIEN; REVIEW LETTER REGARDING SAME.	B110	0.40	140.00
01/08/24	DNR	CORRESPONDENCE TO FARMEE COUNSEL REGARDING STATUS OF PAYMENT TO GULF COAST.	B210	0.10	35.00
01/08/24	DNR	CORRESPONDENCE WITH OIL AND GAS COUNSEL REGARDING FARMOUT AGREEMENT AND PAYMENT ISSUES.	B210	0.40	140.00
01/08/24	PLH	EMAILS WITH TIEP INVESTOR AND MS. BEHREND'S AND OFFICE CONFERENCE MS. BEHREND'S ON SETTLEMENTS AND PAYMENT ISSUES.	B120	0.40	217.80
01/08/24	PLH	ADDRESS ISSUES, INCLUDING EMAILS WITH TIEP INVESTOR COUNSEL AND MS. BEHREND'S ON SETTLEMENT OF TIEP INVESTOR CLAIMS.	B120	0.60	326.70
01/08/24	PLH	REVIEW COURT DECISIONS ON FRAUDULENT TRANSFER CLAIMS ISSUES RELATED TO CONTRACTS AND PONZI SCHEMES IN CONNECTION WITH TIEP INVESTOR CLAIMS AND SETTLEMENT OF SAME.	B120	1.00	544.50
01/08/24	PLH	REVIEW EMAIL COUNSEL FOR TIEP INVESTOR CLIENT DOCUMENTS AND RESPOND TO SAME ON POTENTIAL SETTLEMENT.	B120	0.40	217.80
01/09/24	DNR	CORRESPONDENCE FROM SCHLEICHER CAD COUNSEL REGARDING STATEMENT OF OWNERSHIP TRANSFER.	B240	0.10	35.00
01/09/24	DNR	CORRESPONDENCE WITH STRETTO REGARDING CLAIM SUBMISSION AND ISSUES ON SAME OF INVESTOR; REVIEW SUBMISSION.	B310	0.40	140.00
01/09/24	DNR	REVIEW AND RESPOND TO INVESTOR INQUIRIES.	B110	0.80	280.00
01/09/24	DNR	CORRESPONDENCE WITH REID COLLINS AND DEBORAH D. WILLIAMSON REGARDING SETTLEMENT MOTION AND AGREEMENT.	BT160	0.50	175.00
01/09/24	DNR	CORRESPONDENCE WITH FARMEE COUNSEL REGARDING AMOUNTS OWED TO GULF COAST.	B210	0.30	105.00
01/09/24	DNR	CORRESPONDENCE WITH VICKI PALMOUR CONSULTING REGARDING RAILROAD COMMISSION DOCKETS AND UNDERLYING COMPLAINTS.	B210	0.40	140.00
01/09/24	DNR	CORRESPONDENCE TO SEC COUNSEL REGARDING	B110	0.20	70.00



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		CORRESPONDENCE WITH INVESTOR COUNSEL REGARDING CALIFORNIA STATE COURT LAWSUIT AND UNDERLYING PLEADINGS ON SAME.			
01/09/24	DNR	REVIEW CORRESPONDENCE FROM INVESTOR COUNSEL AND UNDERLYING PLEADINGS SUPPORTING SAME; DRAFT AND SEND RESPONSE TO INVESTOR COUNSEL.	B110	0.90	315.00
01/09/24	DNR	RECEIVE AND REVIEW NOTICE OF FORCE MAJEURE FROM ENTERPRISE; SEND TO COMPLIANCE TEAM.	B210	0.30	105.00
01/09/24	DNR	RECEIVE AND PROCESS RECEIVER'S MAIL.	B210	0.40	140.00
01/09/24	DNR	CALL WITH DEBORAH D. WILLIAMSON AND AHUJA & CLARK REGARDING OUTSTANDING ACCOUNTING AND TAX ITEMS.	B240	0.30	105.00
01/09/24	DNR	CORRESPONDENCE TO OIL AND GAS COUNSEL AND VICKI PALMOUR CONSULTING REGARDING ASSIGNMENT AND TRANSFER OF OWNERSHIP RECEIVED AND FINAL ROYALTY PAYMENT ITEM.	B210	0.10	35.00
01/09/24	DNR	CORRESPONDENCE WITH REID COLLINS REGARDING OUTSTANDING AMOUNTS OF FORMER COUNSEL.	BT160	0.30	105.00
01/09/24	DNR	CORRESPONDENCE WITH OFFICE OF ATTORNEY GENERAL REGARDING RAILROAD COMMISSION DOCKETS AND REQUESTS FOR UNDERLYING COMPLAINTS; SEND TO OIL AND GAS COUNSEL.	B210	0.30	105.00
01/09/24	DNR	CORRESPONDENCE TO VICKI PALMOUR CONSULTING REGARDING ROYALTY PAYMENTS RETURNED.	B210	0.10	35.00
01/09/24	DNR	CALL WITH OIL AND GAS COUNSEL REGARDING ESCHEATMENT AND RETURNED ROYALTY PAYMENT ISSUES.	B210	0.60	210.00
01/09/24	DNR	CORRESPONDENCE FROM ROYALTY OWNER COUNSEL REGARDING ACCESS LEASE; REVIEW SAME.	B110	0.30	105.00
01/09/24	DNR	CORRESPONDENCE WITH OIL AND GAS COUNSEL AND CONTRACT OPERATOR REGARDING ACCESS LEASE AND ISSUES REGARDING SAME RAISED BY ROYALTY OWNER COUNSEL.	B210	0.40	140.00
01/09/24	DNR	CORRESPONDENCE WITH DEBORAH D. WILLIAMSON REGARDING INVESTOR INQUIRY.	B110	0.20	70.00
01/09/24	DNR	TELEPHONE CONFERENCE WITH INVESTOR REGARDING CLAIMS PROCEDURE QUESTIONS.	BT160	0.20	70.00
01/09/24	DNR	CORRESPONDENCE TO AUCTIONEER REGARDING RESULTS OF 1/1/24 AUCTION.	B130	0.10	35.00
01/09/24	DNR	CORRESPONDENCE WITH STRETTO REGARDING RESPONSE TRACKER.	B110	0.20	70.00



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DATE	ID	DESCRIPTION	TASK	HOURS	AMOUNT
01/09/24	DNR	CORRESPONDENCE WITH AUCTIONEER REGARDING RESULTS OF JANUARY 1, 2024 AUCTION.	B130	0.20	70.00
01/09/24	PLH	REVIEW PAYMENT INFORMATION AND DOCUMENTS FROM ACCOUNTABILITY AND TELEPHONE CONFERENCE TIEP INVESTOR REGARDING TIEP INVESTOR DEMAND LETTER CLAIMS AND POTENTIAL SETTLEMENT.	B120	1.20	653.40
01/09/24	PLH	ADDRESS TIEP INVESTOR SETTLEMENT ISSUES AND EMAILS ON SAME.	B120	0.20	108.90
01/09/24	PLH	REVIEW EMAIL MS. BEHREND'S AND TELEPHONE CONFERENCE MS. BEHREND'S REGARDING TIEP INVESTOR CLAIM SETTLEMENTS AND SETTLEMENT PAYMENTS.	B120	0.20	108.90
01/10/24	DNR	CORRESPONDENCE WITH GULF COAST REGARDING WIRE OF AMOUNTS OWED TO RECEIVER.	B210	0.30	105.00
01/10/24	DNR	PREP CALL WITH OIL AND GAS COUNSEL AND DEBORAH D. WILLIAMSON REGARDING DISCUSSIONS WITH OFFICE OF ATTORNEY GENERAL ON BEHALF OF RAILROAD COMMISSION.	B210	0.80	280.00
01/10/24	DNR	REVIEW CONSIGNOR STATEMENT FROM AUCTIONEER FOR JANUARY 1, 2024 AUCTION.	B130	0.20	70.00
01/10/24	DNR	TELEPHONE CONFERENCE WITH INVESTOR REGARDING CLAIMS SUBMISSION.	B110	0.20	70.00
01/10/24	DNR	CORRESPONDENCE WITH YAIR BARAHONA REGARDING JANUARY 2024 WIRE.	B110	0.20	70.00
01/10/24	DNR	PROCESS DATA HOSTING WIRE FOR JANUARY 2024; CORRESPONDENCE WITH DEBORAH D. WILLIAMSON REGARDING SAME.	B210	0.20	70.00
01/10/24	DNR	DISCUSS WITH DEBORAH D. WILLIAMSON PREVIOUS SETTLEMENT OFFER COMMUNICATED TO RAILROAD COMMISSION.	BT160	0.20	70.00
01/10/24	DNR	DISCUSS TIEP SETTLEMENT CHECK ISSUE WITH PATRICK L. HUFFSTICKLER.	BT160	0.20	70.00
01/10/24	DNR	DISCUSS WITH DEBORAH D. WILLIAMSON PROCEEDS AND RESULTS FROM JANUARY 1, 2024 AUCTION.	B130	0.20	70.00
01/10/24	DNR	REVIEW AND RESPOND TO INVESTOR INQUIRIES.	B110	0.40	140.00
01/10/24	DNR	TELEPHONE CONFERENCE WITH INVESTOR REGARDING CLAIM FORMS.	B110	0.10	35.00
01/10/24	DNR	CORRESPONDENCE FROM OFFICE OF ATTORNEY GENERAL REGARDING ADDITIONAL RAILROAD COMMISSION DOCKETS; REVIEW SAME AND SEND TO OIL AND GAS COUNSEL.	B210	0.50	175.00



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DATE	ID	DESCRIPTION	TASK	HOURS	AMOUNT
01/10/24	DNR	TELEPHONE CONFERENCE WITH INVESTOR REGARDING CLAIMS PROCEDURE TIMELINE.	B110	0.10	35.00
01/10/24	DNR	CORRESPONDENCE TO STRETTO REGARDING ADDITIONAL NOTICING REQUEST FOR CLAIMS PACKET.	B310	0.10	35.00
01/10/24	DNR	TELEPHONE CONFERENCE WITH INVESTOR REGARDING REQUEST FOR CLAIMS PACKET.	B110	0.10	35.00
01/10/24	DNR	TELEPHONE CONFERENCE WITH OIL AND GAS COUNSEL REGARDING RAILROAD COMMISSION HEARING.	B210	0.10	35.00
01/10/24	DNR	DRAFT REPORT REGARDING SECOND AUCTION BY VOGT.	B130	0.40	140.00
01/10/24	DNR	CALL WITH OFFICE OF ATTORNEY GENERAL, OIL AND GAS COUNSEL, AND DEBORAH D. WILLIAMSON REGARDING RAILROAD COMMISSION DOCKETS AND COMMISSION HEARING ON SAME AND ISSUES WITH CLAIM.	B210	1.00	350.00
01/10/24	DNR	CORRESPONDENCE TO ROYALTY OWNER COUNSEL REGARDING PURCHASER CONTACT.	B110	0.10	35.00
01/10/24	PLH	OFFICE CONFERENCE MS. BEHREND'S AND EMAILS WITH MS. BEHREND'S AND TIEP INVESTORS ON SETTLEMENT PAYMENT ISSUES.	B120	0.30	163.35
01/10/24	PLH	EMAILS WITH TIEP INVESTOR AND MS. BEHREND'S ON SETTLEMENT PAYMENT AND RELATED ISSUES.	B120	0.20	108.90
01/11/24	DNR	CORRESPONDENCE WITH DARRELL R. JONES REGARDING QUARTERLY REPORT.	BT155	0.20	70.00
01/11/24	DNR	CORRESPONDENCE WITH ROYALTY OWNER COUNSEL REGARDING SALE OF OIL AND GAS ASSETS IN SCHLEICHER COUNTY.	B110	0.30	105.00
01/11/24	DNR	REVIEW AND RESPOND TO CREDITOR INQUIRIES.	B110	2.40	840.00
01/11/24	DNR	TELEPHONE CONFERENCE WITH INVESTOR REGARDING CLAIMS PROCEDURE AND REPORTING FUNDS NEVER TRANSFERRED TO HEARTLAND BY FINANCIAL ADVISOR.	B110	0.40	140.00
01/11/24	DNR	CORRESPONDENCE TO SEC COUNSEL REGARDING INVESTOR INQUIRY.	B110	0.10	35.00
01/11/24	DNR	TELEPHONE CONFERENCE WITH INVESTOR REGARDING CASE CONCERN.	B110	0.20	70.00
01/11/24	DNR	CORRESPONDENCE TO SEC COUNSEL REGARDING INVESTOR COMPLAINT.	B110	0.10	35.00
01/11/24	DNR	RECEIVE AND PROCESS RECEIVER'S MAIL.	B210	0.30	105.00
01/11/24	DNR	CORRESPONDENCE WITH COMPLIANCE TEAM REGARDING	B210	0.20	70.00



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DATE	ID	DESCRIPTION	TASK	HOURS	AMOUNT
		RAILROAD COMMISSION MAIL RECEIVED.			
01/11/24	DNR	CORRESPONDENCE WITH CONTRACT OPERATOR REGARDING ELDORADO INQUIRY.	B210	0.10	35.00
01/11/24	DNR	REVISE SETTLEMENT MOTION WITH FORMER COUNSEL.	BT160	0.40	140.00
01/11/24	DNR	TELEPHONE CONFERENCE WITH INVESTOR REGARDING PROPOSED CLAIM AMOUNT.	B110	0.10	35.00
01/11/24	DNR	TELEPHONE CONFERENCE WITH INVESTOR REGARDING CLAIMS PROCEDURE AND DISTRIBUTION QUESTIONS.	B110	0.10	35.00
01/11/24	DNR	TELEPHONE CONFERENCE WITH INVESTOR REGARDING CLAIMS PROCEDURE QUESTIONS AND REISSUANCE OF CLAIMS PACKET.	B110	0.20	70.00
01/11/24	DNR	CORRESPONDENCE WITH STRETTO REGARDING ADDITIONAL CLAIMS PACKET NOTICING AND INVESTOR CONTACT INFORMATION UPDATES.	B310	0.40	140.00
01/12/24	DNR	CORRESPONDENCE WITH OFFICE OF THE ATTORNEY GENERAL REGARDING RAILROAD COMMISSION DOCKETS AND CONTINUED NEGOTIATIONS.	B210	0.20	70.00
01/12/24	DNR	REVIEW AND RESPOND TO INVESTOR INQUIRIES.	B110	0.80	280.00
01/12/24	DNR	CORRESPONDENCE WITH PATRICK L. HUFFSTICKLER REGARDING TIEP SETTLEMENT FUNDS.	BT160	0.20	70.00
01/12/24	DNR	CORRESPONDENCE TO AHUJA & CLARK REGARDING TIEP SETTLEMENT FUNDS FOR TAX PURPOSES.	B240	0.10	35.00
01/12/24	DNR	CORRESPONDENCE WITH STRETTO REGARDING ADDITIONAL CLAIMS NOTICING AND INVESTOR CONTACT UPDATES.	B310	0.40	140.00
01/12/24	DNR	CORRESPONDENCE FROM STRETTO REGARDING CLAIMS REPORT.	B310	0.10	35.00
01/12/24	DNR	RECEIVE AND PROCESS RECEIVER'S MAIL.	B210	0.30	105.00
01/16/24	DNR	RECEIVE AND REVIEW ACCOUNT ANALYSIS FROM IBC BANK; SEND TO AHUJA & CLARK.	B210	0.30	105.00
01/16/24	DNR	REVIEW DRAFT SETTLEMENT AGREEMENT WITH LAW FIRM.	BT160	0.50	175.00
01/16/24	DNR	RECEIVE AND REVIEW FROM VICKI PALMOUR CONSULTING LEDGERS FOR PANTHER CITY AND BARRON PETROLEUM; CORRESPONDENCE TO AHUJA & CLARK REGARDING SAME.	B210	0.50	175.00
01/16/24	DNR	RESEARCH BANK RECORDS FOR INFORMATION TO SEND TO AHUJA & CLARK FOR QUARTERLY REPORT EXHIBITS; CORRESPONDENCE WITH AHUJA & CLARK REGARDING SAME.	BT155	0.50	175.00



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01/16/24	DNR	REVIEW AND RESPOND TO INVESTOR INQUIRIES.	B110	1.40	490.00
01/16/24	DNR	RECEIVE AND PROCESS RECEIVER'S MAIL.	B210	0.30	105.00
01/16/24	DNR	CORRESPONDENCE TO COMPLIANCE TEAM REGARDING RAILROAD COMMISSION MAIL.	B210	0.10	35.00
01/17/24	DNR	REVISE AND FILE SECOND VOGT AUCTION REPORT.	B130	0.20	70.00
01/17/24	DNR	CALL WITH OFFICE OF THE ATTORNEY GENERAL, DEBORAH D. WILLIAMSON, AND OIL AND GAS COUNSEL REGARDING CONTINUED NEGOTIATIONS ON BEHALF OF RAILROAD COMMISSION.	BT160	0.30	105.00
01/17/24	DNR	CORRESPONDENCE FROM AND TELEPHONE CONFERENCE WITH CREDITOR'S COUNSEL REGARDING CLAIMS PROCEDURE AND TIMELINE.	B110	0.30	105.00
01/17/24	DNR	CORRESPONDENCE WITH AHUJA & CLARK REGARDING FINANCIAL INFORMATION FOR 5 RAILROAD COMMISSION OPERATORS.	B240	0.30	105.00
01/17/24	DNR	DISCUSS WITH DEBORAH D. WILLIAMSON 2022 TAX RETURNS.	B240	0.20	70.00
01/17/24	DNR	REVIEW AND RESPOND TO INVESTOR INQUIRIES.	B110	1.00	350.00
01/17/24	DNR	TELEPHONE CONFERENCE WITH INVESTOR REGARDING CLAIMS PROCEDURE TIMELINE.	B110	0.10	35.00
01/17/24	DNR	TELEPHONE CONFERENCE WITH INVESTOR REGARDING CLAIMS PROCEDURE AND SUBMISSION TO STRETTO.	B110	0.10	35.00
01/17/24	DNR	CORRESPONDENCE TO STRETTO REGARDING ADDITIONAL CLAIMS PACKAGE NOTICING.	B310	0.20	70.00
01/17/24	DNR	TELEPHONE CONFERENCE WITH INVESTOR REGARDING CLAIM PROCEDURE AND QUESTIONS ON FORM.	B110	0.20	70.00
01/17/24	DNR	TELEPHONE CONFERENCE WITH INVESTOR REGARDING CLAIMS DOCUMENT QUESTIONS.	B110	0.10	35.00
01/17/24	DNR	TELEPHONE CONFERENCE WITH INVESTOR REGARDING NEW CONTACT INFORMATION.	B110	0.10	35.00
01/17/24	DNR	TELEPHONE CONFERENCE WITH INVESTOR REGARDING SUBMISSION OF CLAIM FORM AND QUESTIONS.	B110	0.20	70.00
01/17/24	DNR	TELEPHONE CONFERENCE WITH INVESTOR REGARDING CLAIMS PROCEDURE AND DISTRIBUTION INFORMATION.	B110	0.10	35.00
01/17/24	DNR	TELEPHONE CONFERENCE WITH INVESTOR REGARDING CLAIMS PROCEDURE FORM.	B110	0.10	35.00
01/17/24	DNR	RESEARCH CASE LAW IN SUPPORT OF SETTLEMENT	BT160	0.60	210.00



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DATE	ID	DESCRIPTION	TASK	HOURS	AMOUNT
		AGREEMENT IN SIMILAR RECEIVERSHIP CASES.			
01/17/24	DNR	CORRESPONDENCE WITH AHUJA & CLARK REGARDING 2022 TAX RETURNS.	B240	0.20	70.00
01/17/24	DNR	PROCESS VENDOR PAYMENTS.	B210	0.20	70.00
01/17/24	DNR	TELEPHONE CONFERENCE WITH INVESTOR COUNSEL REGARDING TRANSACTION SCHEDULE AND CLAIM PORTAL.	B110	0.20	70.00
01/17/24	DNR	TELEPHONE CONFERENCE WITH INVESTOR REGARDING NEEDING CLAIM PACKAGE.	B110	0.20	70.00
01/17/24	DNR	CORRESPONDENCE TO STRETTO REGARDING INVESTOR CONTACT UPDATE.	B110	0.10	35.00
01/17/24	DNR	TELEPHONE CONFERENCE WITH INVESTOR REGARDING INFORMATION TOLD TO HER BY FINANCIAL ADVISOR.	B110	0.20	70.00
01/17/24	DNR	TELEPHONE CONFERENCE WITH INVESTOR REGARDING CASE STATUS.	B110	0.10	35.00
01/17/24	DNR	TELEPHONE CONFERENCE WITH INVESTOR REGARDING QUESTIONS ON TRANSACTION SCHEDULE.	B110	0.20	70.00
01/17/24	DNR	TELEPHONE CONFERENCE WITH INVESTOR REGARDING CLAIM SUBMISSION AND PORTAL ACCESS ISSUES.	B110	0.20	70.00
01/18/24	DNR	TELEPHONE CONFERENCE WITH INVESTOR REGARDING TRANSACTION SCHEDULE.	B110	0.10	35.00
01/18/24	DNR	CALL WITH AHUJA & CLARK AND DEBORAH D. WILLIAMSON REGARDING FINANCIAL STATUS OF 5 OPERATORS.	B210	0.50	175.00
01/18/24	DNR	TELEPHONE CONFERENCE WITH INVESTOR REGARDING QUESTIONS ON CLAIMS PROCEDURE AND TRANSACTION SCHEDULE.	B110	0.20	70.00
01/18/24	DNR	RECEIVE AND RESPOND TO INVESTOR INQUIRIES.	B110	0.60	210.00
01/18/24	DNR	CORRESPONDENCE WITH STRETTO REGARDING ADDITIONAL CLAIM NOTICING.	B310	0.30	105.00
01/18/24	DNR	CORRESPONDENCE WITH DEBORAH D.WILLIAMSON AND REID COLLINS REGARDING DRAFT SETTLEMENT AGREEMENT AND CONFIDENTIALITY ITEMS AND PLEADING ON SAME.	BT160	0.80	280.00
01/18/24	DNR	TELEPHONE CONFERENCE WITH INVESTOR REGARDING FUNDS NOT RECEIVED AND CLAIMS PROCEDURE.	B110	0.30	105.00
01/18/24	DNR	TELEPHONE CONFERENCE WITH INVESTOR REGARDING CLAIMS PROCEDURE AND TRANSACTION SCHEDULE QUESTIONS.	B110	0.10	35.00





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01/18/24	DNR	TELEPHONE CONFERENCE WITH INVESTOR REGARDING CLAIMS PROCEDURE SUBMISSION ISSUE.	B110	0.10	35.00
01/18/24	DNR	TELEPHONE CONFERENCE WITH INVESTOR REGARDING CLAIMS PROCEDURE TIMELINE.	B110	0.10	35.00
01/18/24	DNR	DISCUSS WITH DEBORAH D. WILLIAMSON INVESTOR INQUIRIES.	B110	0.20	70.00
01/18/24	DNR	CORRESPONDENCE WITH AHUJA & CLARK REGARDING DISPUTED INVESTOR CLAIMS.	B310	0.30	105.00
01/18/24	DNR	CORRESPONDENCE FROM STRETTO REGARDING CLAIMS REPORT.	B310	0.10	35.00
01/18/24	DNR	TELEPHONE CONFERENCE WITH INVESTOR REGARDING CLAIMS PORTAL QUESTIONS.	B110	0.10	35.00
01/18/24	DNR	REVIEW CLAIMS REPORT.	B310	0.40	140.00
01/18/24	DNR	CORRESPONDENCE TO TAX COUNSEL REGARDING SETTLEMENT MOTION AND TAX CONTENT.	BT160	0.10	35.00
01/18/24	DNR	TELEPHONE CONFERENCE WITH INVESTOR REGARDING TRANSACTION SCHEDULE AND CLAIMS PROCEDURE TIMELINE.	B110	0.10	35.00
01/18/24	DNR	CONTINUE DRAFTING SETTLEMENT MOTION WITH LAW FIRM.	BT160	2.60	910.00
01/18/24	PLH	ANALYZE COUNTER-OFFERS BY COUNSEL FOR TIEP INVESTORS TO DEMAND LETTER CLAIMS.	B120	1.20	653.40
01/20/24	MGC	TAX LAW ANALYSIS OF PROPOSED HEARTLAND INVESTOR/SETTLEMENT TERMS; PREPARE EMAIL TO MS. WILLIAMSON, MS. BEHREND'S REGARDING SAME; RELATED REVIEW OF TAX LAW SUMMARY.	B240	0.50	324.00
01/22/24	DNR	CORRESPONDENCE WITH OFFICE OF ATTORNEY GENERAL REGARDING CONTINUED NEGOTIATIONS.	BT160	0.40	140.00
01/22/24	DNR	REVIEW AND RESPOND TO INVESTOR INQUIRIES.	B110	0.70	245.00
01/22/24	DNR	CORRESPONDENCE WITH STRETTO REGARDING ADDITIONAL CLAIMS NOTICING.	B310	0.30	105.00
01/22/24	DNR	CORRESPONDENCE FROM GENERAL LAND OFFICE REGARDING MISSING REPORTS; CORRESPONDENCE WITH COMPLIANCE TEAM REGARDING SAME POST-ABANDONMENT.	B210	0.40	140.00
01/22/24	DNR	RECEIVE AND REVIEW RECEIVER'S MAIL.	B210	0.40	140.00
01/22/24	DNR	CORRESPONDENCE TO COMPLIANCE TEAM REGARDING RAILROAD COMMISSION MAIL RECEIVED.	B210	0.10	35.00
01/22/24	DNR	CORRESPONDENCE WITH AHUJA & CLARK REGARDING FINANCIAL DOCUMENTS FOR RAILROAD COMMISSION	B210	0.40	140.00



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		OPERATORS.			
01/22/24	DNR	RECEIVE AND REVIEW TRACKER FOR STRETTO INQUIRIES; CORRESPONDENCE WITH STRETTO REGARDING SAME.	B110	0.50	175.00
01/22/24	DNR	CORRESPONDENCE FROM AHUJA & CLARK REGARDING ALLOCATED EXPENSES AND REVIEW SPREADSHEET IN DETAIL FOR SAME AHEAD OF CALL.	B240	0.50	175.00
01/22/24	DNR	UPDATE WEBSITE CONTENT.	B110	0.40	140.00
01/22/24	DNR	RECEIVE AND REVIEW AHUJA & CLARK COMMENTS ON DISPUTE CLAIMS.	B310	0.30	105.00
01/22/24	DNR	CALL WITH DEBORAH D. WILLIAMSON AND AHUJA & CLARK REGARDING DISPUTED CLAIMS OF INVESTORS.	B310	0.70	245.00
01/22/24	DNR	CORRESPONDENCE WITH AHUJA & CLARK REGARDING IRS MAIL RECEIVED; REVIEW SAME SENT TO MADHU AHUJA.	B240	0.30	105.00
01/22/24	DNR	REVISE SETTLEMENT AGREEMENT WITH LAW FIRM.	BT160	0.90	315.00
01/22/24	DNR	CORRESPONDENCE WITH REID COLLINS REGARDING REVISIONS TO SETTLEMENT AGREEMENT AND CORRESPONDING MOTION AND NEED FOR CALL ON SAME.	BT160	0.50	175.00
01/22/24	DNR	CALL WITH AHUJA & CLARK AND DEBORAH D. WILLIAMSON REGARDING ALLOCATION OF EXPENSES AND TAX PREPARATION ITEMS.	B240	0.90	315.00
01/22/24	DNR	CALL WITH DEBORAH D. WILLIAMSON AND REID COLLINS REGARDING SETTLEMENT AGREEMENT AND CORRESPONDING PLEADING ITEMS.	BT160	0.70	245.00
01/22/24	PLH	REVIEW CORRESPONDENCE FROM COUNSEL FOR TIEP INVESTORS AND REVIEW CASES; CITED IN SAME.	B120	0.80	435.60
01/23/24	DNR	TELEPHONE CONFERENCE WITH INVESTOR COUNSEL REGARDING CASE BACKGROUND, STATUS OF SALES AND ABANDONMENT, AND CLAIMS PROCEDURE.	B110	1.00	350.00
01/23/24	DNR	CORRESPONDENCE WITH CREDITOR COUNSEL REGARDING FILED LIEN AFFIDAVIT WITH RESPECT TO FARMOUT PROPERTIES.	B110	0.50	175.00
01/23/24	DNR	REVIEW FILE-STAMPED LIEN AFFIDAVIT REGARDING FARMOUT PROPERTIES; DISCUSS WITH OIL AND GAS COUNSEL.	B110	0.70	245.00
01/23/24	DNR	CORRESPONDENCE WITH STRETTO REGARDING INVESTOR COUNSEL'S REQUEST FOR TRANSACTION SCHEDULES.	B310	0.30	105.00
01/23/24	DNR	CORRESPONDENCE TO INVESTOR COUNSEL REGARDING STATUS OF DISMISSAL OF RECEIVERSHIP PARTY FROM	B110	0.10	35.00



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DATE	ID	DESCRIPTION	TASK	HOURS	AMOUNT
		COMPLAINT.			
01/23/24	DNR	CORRESPONDENCE WITH OFFICE OF THE ATTORNEY GENERAL REGARDING FINANCIAL DOCUMENTS OF RAILROAD COMMISSION OPERATORS.	B210	0.30	105.00
01/23/24	DNR	RECEIVE AND PROCESS RECEIVER'S MAIL.	B210	0.50	175.00
01/23/24	DNR	CORRESPONDENCE TO COMPLIANCE TEAM REGARDING RAILROAD COMMISSION MAIL RECEIVED.	B210	0.20	70.00
01/23/24	DNR	CORRESPONDENCE TO AHUJA & CLARK REGARDING TAX DOCUMENTS RECEIVED.	B240	0.10	35.00
01/23/24	DNR	CORRESPONDENCE WITH INVESTOR COUNSEL REGARDING CLAIM PACKAGES.	B110	0.30	105.00
01/23/24	DNR	TELEPHONE CONFERENCE WITH LANDOWNER COUNSEL REGARDING STATUS OF FARMOUT.	B110	0.30	105.00
01/23/24	DNR	CORRESPONDENCE WITH REID COLLINS REGARDING REVISIONS TO SETTLEMENT AGREEMENT AND MOTION.	BT160	0.20	70.00
01/23/24	DNR	TELEPHONE CONFERENCE WITH DEBORAH D. WILLIAMSON REGARDING FARMOUT AND STATUS OF SAME.	B210	0.20	70.00
01/23/24	DNR	REVIEW CERTIFICATE OF INSURANCE REGARDING FARMEE.	B210	0.10	35.00
01/23/24	DNR	CORRESPONDENCE TO SEC COUNSEL REGARDING FARMOUT STATUS.	B110	0.10	35.00
01/23/24	DNR	CORRESPONDENCE WITH ENERGYNET REGARDING ABANDONMENT OF UNSOLD LOTS.	B130	0.20	70.00
01/24/24	DNR	CORRESPONDENCE WITH REID COLLINS REGARDING POTENTIAL SETTLEMENT.	BT160	0.80	280.00
01/24/24	DNR	REVIEW AND RESPOND TO INVESTOR INQUIRIES.	B110	0.80	280.00
01/24/24	DNR	TELEPHONE CONFERENCE WITH REID COLLINS REGARDING ENTRY OF ORDERS AND PROCESS.	BT160	0.30	105.00
01/24/24	DNR	CALL WITH INVESTOR REGARDING QUESTIONS ON PRIOR INVESTMENTS.	B110	0.20	70.00
01/24/24	DNR	RECEIVE AND REVIEW GULF COAST STATEMENT FOR DECEMBER 2023; SEND TO COMPLIANCE TEAM.	B210	0.30	105.00
01/24/24	DNR	CORRESPONDENCE TO STRETTO REGARDING ADDITIONAL CLAIMS NOTICING.	B310	0.20	70.00
01/24/24	DNR	TELEPHONE CONFERENCE WITH VENDOR REGARDING ELDORADO PIPELINE QUESTION.	B110	0.20	70.00
01/24/24	DNR	RECEIVE AND REVIEW EXPENSE ALLOCATION SPREADSHEET	B240	0.40	140.00



DEBORAH D WILLIAMSON  
DEBORAH WILLIAMSON

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DATE	ID	DESCRIPTION	TASK	HOURS	AMOUNT
		FOR TAXES FROM AHUJA & CLARK.			
01/24/24	DNR	CORRESPONDENCE WITH DEBORAH D. WILLIAMSON REGARDING BAR ORDER.	BT160	0.30	105.00
01/25/24	DNR	REVISE SETTLEMENT AGREEMENT.	BT160	1.80	630.00
01/25/24	DNR	CORRESPONDENCE WITH AHUJA & CONSULTANTS REGARDING EXPENSE ALLOCATION CALL.	B240	0.20	70.00
01/25/24	DNR	CORRESPONDENCE WITH REID COLLINS REGARDING REVISIONS TO SETTLEMENT AGREEMENT.	BT160	0.60	210.00
01/25/24	DNR	CORRESPONDENCE WITH INVESTOR COUNSEL REGARDING TRANSACTION SCHEDULES AND CLAIMS PROCEDURE PLEADINGS.	B110	0.40	140.00
01/25/24	DNR	REVIEW REVISED SETTLEMENT AGREEMENT AND PROVIDE FURTHER COMMENTS TO REID COLLINS.	BT160	0.70	245.00
01/25/24	DNR	CORRESPONDENCE WITH REID COLLINS REGARDING ADDITIONAL EDITS TO SETTLEMENT AGREEMENT.	BT160	0.30	105.00
01/25/24	DNR	CORRESPONDENCE FROM STRETTO REGARDING CLAIMS REPORT; CORRESPONDENCE WITH AHUJA & CONSULTANTS ON SAME.	B310	0.30	105.00
01/25/24	DNR	TELEPHONE CONFERENCE WITH INVESTOR REGARDING CLAIMS PROCEDURE QUESTIONS.	B110	0.20	70.00
01/25/24	DNR	CORRESPONDENCE WITH STRETTO REGARDING INVESTOR TRANSACTION SCHEDULE.	B310	0.20	70.00
01/25/24	DNR	TELEPHONE CONFERENCE WITH INVESTOR REGARDING CLAIMS SUBMISSION.	B110	0.10	35.00
01/25/24	DNR	RECEIVE AND REVIEW UPDATE FROM FARMEE.	B210	0.30	105.00
01/25/24	DNR	CORRESPONDENCE WITH STRETTO REGARDING ADDITIONAL CLAIMS NOTICING.	B310	0.20	70.00
01/25/24	DNR	TELEPHONE CONFERENCE WITH INVESTOR REGARDING NET TRANSACTION AMOUNT CONFIRMATION.	B110	0.10	35.00
01/25/24	DNR	CORRESPONDENCE WITH DEBORAH D. WILLIAMSON REGARDING TAX EXPENSE ALLOCATION.	B240	0.20	70.00
01/25/24	DNR	CORRESPONDENCE WITH OFFICE OF ATTORNEY GENERAL REGARDING CALL ON FINANCIAL INFORMATION OF OPERATORS.	B210	0.20	70.00
01/25/24	DNR	CORRESPONDENCE TO OIL AND GAS COUNSEL REGARDING OPERATOR FORMATION INFORMATION.	B210	0.10	35.00



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DEBORAH WILLIAMSON

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DATE	ID	DESCRIPTION	TASK	HOURS	AMOUNT
01/25/24	DNR	TELEPHONE CONFERENCE WITH OIL AND GAS COUNSEL REGARDING ESCHEATMENT STATUS.	B210	0.30	105.00
01/25/24	DNR	REVIEW UPDATED CLAIMS REPORT.	B310	0.30	105.00
01/25/24	DNR	TELEPHONE CONFERENCE WITH INVESTOR REGARDING QUESTION ON CLAIM FORM.	B110	0.20	70.00
01/25/24	DNR	TELEPHONE CONFERENCE WITH INVESTOR COUNSEL REGARDING FAILURE TO RECEIVE FUNDS AND CLAIMS PROCEDURE.	B110	0.40	140.00
01/25/24	DNR	CORRESPONDENCE TO SEC COUNSEL REGARDING FARMOUT UPDATE.	B210	0.10	35.00
01/25/24	DNR	TELEPHONE CONFERENCE WITH REID COLLINS REGARDING FURTHER REVISIONS TO SETTLEMENT AGREEMENT.	BT160	0.30	105.00
01/25/24	DNR	TELEPHONE CONFERENCE WITH INVESTOR REGARDING QUESTIONS ON TRANSACTION SCHEDULE AND INSTRUCTIONS.	B110	0.20	70.00
01/26/24	DNR	CALL WITH D. WILLIAMSON AND AHUJA & CONSULTANTS REGARDING EXPENSE ALLOCATION FOR TAX RETURNS.	B240	0.50	175.00
01/26/24	DNR	CORRESPONDENCE WITH AHUJA & CONSULTANTS REGARDING EXPENSE ALLOCATION SPREADSHEETS AND COMMENTS ON SAME.	B240	0.20	70.00
01/26/24	DNR	ANALYZE NON-INVESTOR CLAIMS REPORT AND CALCULATE OPERATOR CLAIMS TO DATE.	B310	0.30	105.00
01/26/24	DNR	CORRESPONDENCE WITH D. WILLIAMSON AND REID COLLINS REGARDING REVISED SETTLEMENT AGREEMENT.	BT160	0.40	140.00
01/26/24	DNR	REVIEW FURTHER REVISED SETTLEMENT AGREEMENT.	BT160	0.30	105.00
01/26/24	DNR	DRAFT RESPONSE TO OFFICE OF ATTORNEY GENERAL REGARDING RAILROAD COMMISSION OPERATOR ASSETS.	B210	0.30	105.00
01/26/24	DNR	REVIEW LETTER FROM INVESTOR COUNSEL TO RECEIVER.	B110	0.20	70.00
01/26/24	DNR	CORRESPONDENCE WITH D. WILLIAMSON REGARDING INVESTOR COUNSEL CORRESPONDENCE.	B210	0.20	70.00
01/26/24	DNR	REVIEW AND RESPOND TO VENDOR INQUIRIES.	B110	0.20	70.00
01/29/24	DNR	CORRESPONDENCE WITH OFFICE OF THE ATTORNEY GENERAL REGARDING CLAIM FORMS FOR RAILROAD COMMISSION.	B310	0.30	105.00
01/29/24	DNR	RECEIVE EMAILS FROM GENERAL LAND OFFICE REGARDING OUTSTANDING REPORTS.	B210	0.20	70.00
01/29/24	DNR	TELEPHONE CONFERENCE WITH ESTATE TRUSTEE REGARDING CLAIMS PACKET.	B110	0.20	70.00



DEBORAH D WILLIAMSON  
DEBORAH WILLIAMSON

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DATE	ID	DESCRIPTION	TASK	HOURS	AMOUNT
01/29/24	DNR	TELEPHONE CONFERENCE WITH VENDOR REGARDING QUESTION ON PAYMENT.	B110	0.10	35.00
01/29/24	DNR	TELEPHONE CONFERENCE WITH INVESTOR REGARDING QUESTIONS ON CLAIMS FORMS AND TRANSACTION SCHEDULE.	B110	0.40	140.00
01/29/24	DNR	TELEPHONE CONFERENCE WITH INVESTOR REGARDING FUNDS NOT RECEIVED FROM FINANCIAL ADVISOR.	B110	0.20	70.00
01/29/24	DNR	TELEPHONE CONFERENCE WITH INVESTOR REGARDING CLAIMS TIMELINE.	B110	0.10	35.00
01/29/24	DNR	TELEPHONE CONFERENCE WITH INVESTOR REGARDING CLAIMS PACKAGE NEVER RECEIVED.	B110	0.20	70.00
01/29/24	DNR	CORRESPONDENCE WITH STRETTO REGARDING ADDITIONAL CLAIMS NOTICING.	B310	0.50	175.00
01/29/24	DNR	TELEPHONE CONFERENCE WITH INVESTOR REGARDING DISPUTING TRANSACTION SCHEDULE.	B110	0.20	70.00
01/29/24	DNR	CORRESPONDENCE WITH OIL AND GAS COUNSEL REGARDING CALL WITH OFFICE OF THE ATTORNEY GENERAL.	B210	0.10	35.00
01/29/24	DNR	TELEPHONE CONFERENCE WITH INVESTOR REGARDING FUNDS NEVER RECEIVED FROM FEEDER FUND.	B110	0.20	70.00
01/29/24	DNR	REVIEW AND RESPOND TO INVESTOR INQUIRIES.	B110	0.40	140.00
01/29/24	DNR	DRAFT INTERNATIONAL WIRE FOR DATA HOSTING FOR FEBRUARY 2024; CORRESPONDENCE WITH DEBORAH D. WILLIAMSON REGARDING SAME.	B210	0.30	105.00
01/29/24	DNR	RECEIVE AND PROCESS RECEIVER'S MAIL.	B210	0.30	105.00
01/29/24	DNR	CORRESPONDENCE WITH CONTRACT OPERATOR REGARDING CALL WITH ENERGYNET.	B130	0.20	70.00
01/29/24	DNR	TELEPHONE CONFERENCE WITH INVESTOR REGARDING QUESTIONS ON TRANSACTION SCHEDULE.	B110	0.20	70.00
01/29/24	DNR	CORRESPONDENCE WITH AHUJA & CONSULTANTS REGARDING QUARTERLY REPORT EXHIBIT; REVIEW SAME.	BT155	0.30	105.00
01/29/24	DNR	CORRESPONDENCE TO DEBORAH D. WILLIAMSON REGARDING QUARTERLY REPORT.	BT155	0.10	35.00
01/29/24	DNR	PREPARE QUARTERLY REPORT FOR FOURTH QUARTER 2023.	BT155	2.50	875.00
01/30/24	DNR	REVIEW AND RESPOND TO INVESTOR INQUIRIES.	B110	0.40	140.00
01/30/24	DNR	TELEPHONE CONFERENCE WITH INVESTOR REGARDING CLAIMS PROCEDURE.	B110	0.10	35.00
01/30/24	DNR	TELEPHONE CONFERENCE WITH INVESTOR REGARDING	B110	0.10	35.00



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DEBORAH WILLIAMSON

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DATE	ID	DESCRIPTION	TASK	HOURS	AMOUNT
		RESUBMISSION OF CLAIMS PACKET.			
01/30/24	DNR	CORRESPONDENCE WITH STRETTO REGARDING ADDITIONAL SERVICE OF CLAIMS PACKET.	B310	0.40	140.00
01/30/24	DNR	CORRESPONDENCE WITH PATRICK L. HUFFSTICKLER REGARDING TIEP SETTLEMENTS.	BT160	0.10	35.00
01/30/24	DNR	CORRESPONDENCE WITH REID COLLINS AND DEBORAH D. WILLIAMSON REGARDING SETTLEMENT MOTION PROCEDURE.	BT160	0.50	175.00
01/30/24	DNR	CONTINUE DRAFTING FOURTH QUARTER 2023 REPORT; FINALIZE AND FILE SAME.	BT155	3.50	1,225.00
01/30/24	DNR	TELEPHONE CONFERENCE WITH INVESTOR'S WIDOW REGARDING TRUSTEE PAPERWORK AND CLAIMS PROCEDURE QUESTIONS.	B110	0.30	105.00
01/30/24	DNR	CORRESPONDENCE WITH REID COLLINS REGARDING TOLLING AGREEMENT COMMENTS.	BT160	0.50	175.00
01/30/24	DNR	REVIEW EXTENDED TOLLING AGREEMENT.	BT160	0.20	70.00
01/30/24	DNR	DISCUSS WITH DEBORAH D. WILLIAMSON AND PROCESS AMENDED TOLLING AGREEMENT.	BT160	0.30	105.00
01/30/24	DNR	CORRESPONDENCE WITH STRETTO REGARDING ISSUES OF INVESTOR REGARDING PORTAL ACCESS.	B310	0.30	105.00
01/30/24	DNR	CORRESPONDENCE WITH AHUJA & CONSULTANTS REGARDING 1099 ITEMS OUTSTANDING.	B240	0.20	70.00
01/30/24	DNR	CORRESPONDENCE WITH REID COLLINS REGARDING W-9; SEND TO AHUJA & CONSULTANTS.	B240	0.30	105.00
01/30/24	DNR	CORRESPONDENCE WITH AHUJA & CONSULTANTS REGARDING TRANSACTION SCHEDULES.	B310	0.30	105.00
01/30/24	DNR	TELEPHONE CONFERENCE WITH AHUJA & CONSULTANTS REGARDING TRANSACTION SCHEDULE ITEMS.	B310	0.20	70.00
01/30/24	DNR	TELEPHONE CONFERENCE WITH INVESTOR REGARDING CLAIMS SUBMISSION AND QUESTIONS ON SAME.	B110	0.20	70.00
01/30/24	DNR	UPDATE WEBSITE CONTENT.	B110	0.30	105.00
01/30/24	DNR	CORRESPONDENCE WITH AHUJA & CONSULTANT REGARDING FIRM NAME CHANGE.	B110	0.20	70.00
01/30/24	DNR	RECEIVE AND REVIEW FARMER'S INSURANCE CERTIFICATE.	B210	0.20	70.00
01/30/24	PLH	REVIEW SETTLEMENT LETTERS FROM TIEP INVESTOR COUNSEL AND OFFICE CONFERENCE WITH MS. WILLIAMSON ON RESPONSES TO SAME.	B120	0.80	435.60



DEBORAH D WILLIAMSON  
DEBORAH WILLIAMSON

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DATE	ID	DESCRIPTION	TASK	HOURS	AMOUNT
01/30/24	PLH	EMAIL WITH MS. BEHREND ON TIEP INVESTOR SETTLEMENT RECOVERY MATTERS.	B120	0.20	108.90
01/31/24	DNR	REVIEW AND RESPOND TO INVESTOR AND VENDOR INQUIRIES.	B110	0.60	210.00
01/31/24	DNR	DISCUSS POTENTIAL SETTLEMENT WITH DEBORAH D. WILLIAMSON.	BT160	0.20	70.00
01/31/24	DNR	TELEPHONE CONFERENCE WITH INVESTOR REGARDING TRANSACTION SCHEDULE AND UPDATING CONTACT INFORMATION.	B110	0.10	35.00
01/31/24	DNR	TELEPHONE CONFERENCE WITH INVESTOR REGARDING CLAIMS PROCEDURE QUESTIONS.	B110	0.10	35.00
01/31/24	DNR	TELEPHONE CONFERENCE WITH VENDOR REGARDING CLAIMS SUBMISSION.	B110	0.20	70.00
01/31/24	DNR	CORRESPONDENCE WITH VENDOR REGARDING W-9 FOR BARRON PETROLEUM.	B210	0.30	105.00
01/31/24	DNR	DISCUSS AND PROCESS W-9 WITH DEBORAH D. WILLIAMSON.	B210	0.20	70.00
01/31/24	DNR	CORRESPONDENCE WITH STRETTO REGARDING INVESTOR CONTACT INFORMATION AND ADDITIONAL CLAIMS NOTICING.	B310	0.40	140.00
01/31/24	DNR	DISCUSS POTENTIAL CAUSES OF ACTION AND SETTLEMENT STATUS WITH PATRICK L. HUFFSTICKLER.	BT160	0.50	175.00
01/31/24	DNR	REVIEW CORRESPONDENCE FROM CUSTODIAN TO RECEIVER.	B110	0.10	35.00
01/31/24	DNR	CORRESPONDENCE WITH OFFICE OF THE ATTORNEY GENERAL REGARDING CLAIM FORM AND RAILROAD COMMISSION ITEMS.	B310	0.30	105.00
01/31/24	DNR	TELEPHONE CONFERENCE WITH INVESTOR REGARDING DISPUTED TRANSACTION SCHEDULE.	B110	0.20	70.00
01/31/24	DNR	CORRESPONDENCE WITH LOCAL COUNSEL REGARDING UPDATE CALL.	B110	0.20	70.00
01/31/24	PLH	REVIEW NORTHERN DISTRICT OF TEXAS AND FIFTH CIRCUIT TUFTA OPINIONS TO ANALYZE SETTLEMENT OFFERS FROM TIEP INVESTOR COUNSEL AND RESPONSES TO SAME.	B120	1.20	653.40
<b>TOTAL</b>				<b>112.20</b>	<b>\$42,866.30</b>





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DEBORAH WILLIAMSON

MATTER #: 122686.000002  
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**BILLING SUMMARY**

<b>ID</b>	<b>TIMEKEEPER</b>	<b>TITLE</b>	<b>HOURS</b>	<b>RATE</b>	<b>AMOUNT</b>
MGC	MICHAEL G. CUMMING	MEMBER	2.80	648.00	1,814.40
DNR	DANIELLE R. BEHRENDIS	PARTICIPATING MEMBER	95.20	350.00	33,320.00
PLH	PATRICK HUFFSTICKLER	PARTICIPATING MEMBER	14.20	544.50	7,731.90
	<b>TOTAL</b>		<b>112.20</b>		<b>\$42,866.30</b>



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DEBORAH WILLIAMSON

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**DISBURSEMENTS**

<b>DATE</b>	<b>DESCRIPTION</b>	<b>QUANTITY</b>	<b>RATE</b>	<b>AMOUNT</b>
	PHOTOCOPIES	105.00	0.10	10.50
	PRINTING EXPENSES	893.00	0.10	89.30
	RELATIVITY DATA HOSTING	2.00	3,320.00	6,640.00
	SCANNING	30.00	0.10	3.00
	<b>TOTAL DISBURSEMENTS</b>			<b>6,742.80</b>



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DEBORAH WILLIAMSON

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APRIL 24, 2024

**TASK SUMMARY**

<b>TASK</b>	<b>TASK DESCRIPTION</b>	<b>HOURS</b>	<b>AMOUNT</b>
B110	CASE ADMINISTRATION	31.20	10,920.00
B120	ASSET ANALYSIS AND RECOVERY	14.20	7,731.90
B130	ASSET DISPOSITION	1.70	595.00
B210	BUSINESS OPERATIONS	21.10	7,385.00
B240	TAX ISSUES	8.50	3,809.40
B310	CLAIMS ADMINISTRATION & OBJECT	9.40	3,290.00
BT155	STATUS REPORTS	7.20	2,520.00
BT160	LITIGATION CONSULTING	18.90	6,615.00
	<b>TOTAL</b>	<b>112.20</b>	<b>42,866.30</b>

**EXPENSE SUMMARY**

PHOTOCOPIES	10.50
SCANNING	3.00
PRINTING EXPENSES	89.30
RELATIVITY DATA HOSTING	6,640.00
<b>TOTAL</b>	<b>6,742.80</b>



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**

APRIL 24, 2024  
MATTER #: 122686.000002  
INVOICE #: 3582554

*FOR PROFESSIONAL SERVICES RENDERED*

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

FEES	\$	34,032.20
DISBURSEMENTS		3,503.00
<b>INVOICE TOTAL</b>	<b>\$</b>	<b>37,535.20</b>



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

DATE	ID	DESCRIPTION	TASK	HOURS	AMOUNT
02/01/24	DNR	CORRESPONDENCE WITH STRETTO REGARDING INVESTOR INQUIRY ISSUES.	B310	0.30	105.00
02/01/24	DNR	TELEPHONE CONFERENCE WITH INVESTOR REGARDING CLAIMS PROCEDURE.	B110	0.10	35.00
02/01/24	DNR	DISCUSS WITH DEBORAH D. WILLIAMSON CORRESPONDENCE RECEIVED FROM VARIOUS THIRD PARTIES AND RESPONSES TO SAME.	B110	0.30	105.00
02/01/24	DNR	CORRESPONDENCE WITH CUSTODIAN REPRESENTATIVE REGARDING NO COURT APPROVED DISTRIBUTION.	B110	0.20	70.00
02/01/24	DNR	CORRESPONDENCE WITH YAIR BARAHONA REGARDING WIRE FOR FEBRUARY 2024 DATA HOSTING.	B210	0.20	70.00
02/01/24	DNR	CORRESPONDENCE WITH THIRD PARTY REGARDING UNRELATED INVESTOR'S JUDGMENT AGAINST FINANCIAL ADVISOR AND NO CONNECTION TO RECEIVERSHIP.	B110	0.30	105.00
02/01/24	DNR	CORRESPONDENCE FROM STRETTO REGARDING CLAIMS REPORT.	B310	0.10	35.00
02/01/24	DNR	CORRESPONDENCE WITH STRETTO REGARDING INVESTOR CORRESPONDENCE SUBMITTED FOR DISPUTED CLAIMS.	B310	0.40	140.00
02/01/24	DNR	TELEPHONE CONFERENCE WITH VENDOR COUNSEL REGARDING STATUS OF FARMOUT.	B110	0.10	35.00
02/01/24	DNR	CORRESPONDENCE TO OIL AND GAS COUNSEL REGARDING UPDATE ON CALL REGARDING FARMOUT.	B210	0.10	35.00
02/01/24	DNR	REVIEW CLAIMS REPORT.	B310	0.50	175.00
02/01/24	DNR	DISCUSS WITH DEBORAH D. WILLIAMSON POTENTIAL SETTLEMENT OFFER.	BT160	0.10	35.00
02/01/24	DNR	CORRESPONDENCE WITH OFFICE OF THE ATTORNEY GENERAL REGARDING RAILROAD COMMISSION CLAIM.	B310	0.40	140.00
02/01/24	DNR	CORRESPONDENCE AND TELEPHONE CONFERENCE WITH LOCAL COUNSEL REGARDING UPDATE CALL.	B110	0.20	70.00
02/01/24	PLH	EMAIL WITH COUNSEL ON SETTLEMENT OFFER FOR TIEP INVESTOR CLIENTS; REVIEW INFORMATION ON SAME.	B120	0.40	217.80
02/01/24	PLH	EMAIL WITH COUNSEL ON SETTLEMENT OFFER FOR TIEP INVESTOR CLIENTS; REVIEW INFORMATION ON SAME.	B120	0.30	163.35



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DEBORAH WILLIAMSON

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DATE	ID	DESCRIPTION	TASK	HOURS	AMOUNT
02/02/24	DNR	REVIEW AND RESPOND TO INVESTOR AND VENDOR INQUIRIES.	B110	0.80	280.00
02/02/24	DNR	CORRESPONDENCE WITH STRETTO REGARDING CLAIMS SUBMISSION INQUIRIES AND ADDITIONAL CLAIMS NOTICING.	B310	0.80	280.00
02/02/24	DNR	CORRESPONDENCE WITH LOCAL COUNSEL REGARDING CASE UPDATE.	B110	0.20	70.00
02/02/24	DNR	CORRESPONDENCE WITH DEBORAH D. WILLIAMSON AND OIL AND GAS COUNSEL REGARDING ESCROW FUNDS OF ENERGYNET.	B130	0.30	105.00
02/02/24	DNR	RECEIVE AND REVIEW IBC BANK STATEMENTS; SEND TO AHUJA & CONSULTANTS.	B210	0.40	140.00
02/02/24	DNR	CORRESPONDENCE WITH REID COLLINS REGARDING SETTLEMENT MOTION AND CALL.	BT160	0.50	175.00
02/02/24	DNR	RECEIVE AND REVIEW WAB JANUARY 2024 STATEMENT; SEND TO AHUJA & CONSULTANTS.	B210	0.30	105.00
02/02/24	DNR	RECEIVE AND REVIEW RECEIVER'S MAIL.	B210	0.40	140.00
02/02/24	DNR	CORRESPONDENCE TO COMPLIANCE TEAM REGARDING RAILROAD COMMISSION MAIL.	B210	0.10	35.00
02/02/24	PLH	EMAILS WITH COUNSEL ON CALL TO ADDRESS TIEP SETTLEMENT OFFER AND REVIEW CLAWBACK CASE LAW AND TIEP INVESTOR INFORMATION ON SETTLEMENT MATTERS.	B120	0.90	490.05
02/05/24	DNR	CORRESPONDENCE WITH STRETTO REGARDING BAR DATE AND PORTAL ACCESS.	B310	0.30	105.00
02/05/24	DNR	REVIEW AND RESPOND TO INVESTOR AND VENDOR INQUIRIES.	B110	1.00	350.00
02/05/24	DNR	REVIEW CORRESPONDENCE FROM SEC COUNSEL TO INVESTOR COUNSEL.	B110	0.10	35.00
02/05/24	DNR	TELEPHONE CONFERENCE WITH INVESTOR COUNSEL REGARDING CLAIMS PROCEDURE.	B110	0.40	140.00
02/05/24	DNR	CORRESPONDENCE WITH STRETTO REGARDING CLAIMS SUBMISSION INQUIRIES.	B310	0.60	210.00
02/05/24	DNR	TELEPHONE CONFERENCE WITH INVESTOR REGARDING CLAIMS PROCEDURE.	B110	0.10	35.00
02/05/24	DNR	PROVIDE UPDATE TO DEBORAH D. WILLIAMSON REGARDING INVESTOR COUNSEL CALL.	B110	0.10	35.00
02/05/24	DNR	TELEPHONE CONFERENCE WITH INVESTOR REGARDING CLAIMS SUBMISSION.	B110	0.10	35.00
02/05/24	DNR	CORRESPONDENCE WITH OFFICE OF ATTORNEY GENERAL	B310	0.40	140.00



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		REGARDING RAILROAD COMMISSION CLAIM SUBMITTED.			
02/05/24	DNR	TELEPHONE CONFERENCE WITH INVESTOR REGARDING CLAIMS PROCEDURE AND CUSTODIAN FUND QUESTIONS.	B110	0.20	70.00
02/05/24	DNR	CORRESPONDENCE WITH OIL AND GAS COUNSEL REGARDING RAILROAD COMMISSION CLAIM.	B310	0.20	70.00
02/05/24	DNR	REVIEW RAILROAD COMMISSION CLAIM SUBMISSION.	B310	0.20	70.00
02/05/24	DNR	INQUIRE OF COURTROOM DEPUTY REGARDING POTENTIAL STATUS CONFERENCE.	B110	0.10	35.00
02/05/24	DNR	TELEPHONE CONFERENCE WITH INVESTOR REGARDING UPDATING CONTACT INFORMATION.	B110	0.10	35.00
02/05/24	DNR	CORRESPONDENCE TO STRETTO REGARDING UPDATING INVESTOR INFORMATION.	B110	0.10	35.00
02/05/24	DNR	CALL WITH DEBORAH D. WILLIAMSON AND REID COLLINS REGARDING SETTLEMENT MOTION.	BT160	0.40	140.00
02/05/24	DNR	DISCUSS WITH DEBORAH D. WILLIAMSON ESCHEATMENT ISSUES.	B210	0.20	70.00
02/05/24	DNR	TELEPHONE CONFERENCE WITH OIL AND GAS COUNSEL REGARDING ESCHEATMENT CONTRACTOR AGREEMENT.	B210	0.20	70.00
02/05/24	DNR	REVIEW ESCHEATMENT CONTRACTOR AGREEMENT.	B210	0.20	70.00
02/05/24	DNR	RECEIVE AND PROCESS RECEIVER'S MAIL.	B210	0.40	140.00
02/05/24	DNR	CORRESPONDENCE TO AHUJA & CONSULTANTS REGARDING TAX DOCUMENT RECEIVED.	B240	0.10	35.00
02/05/24	DNR	CORRESPONDENCE TO COMPLIANCE TEAM REGARDING RAILROAD COMMISSION MAIL RECEIVED.	B210	0.10	35.00
02/05/24	PLH	REVIEW RELEVANT DOCUMENTS AND CASELAW AND EMAIL AND TELEPHONE CONFERENCE WITH COUNSEL ON SETTLEMENT OFFER MATTERS AND CASELAW SUPPORT FOR RECEIVER'S CLAIMS IN CONNECTION WITH TIEP INVESTOR CLIENTS.	B120	1.00	544.50
02/05/24	PLH	EMAIL AND TELEPHONE CONFERENCE WITH COUNSEL ON SETTLEMENT OFFER ISSUES AND DOCUMENTS AND CASELAW SUPPORTING RECEIVER'S CLAIMS IN CONNECTION WITH TIEP INVESTOR CLIENTS.	B120	0.80	435.60
02/06/24	DNR	TELEPHONE CONFERENCE WITH INVESTOR REGARDING CLAIM SUBMISSION.	B110	0.10	35.00
02/06/24	DNR	REVIEW AND RESPOND TO INVESTOR INQUIRIES.	B110	0.20	70.00



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DATE	ID	DESCRIPTION	TASK	HOURS	AMOUNT
02/06/24	DNR	CORRESPONDENCE WITH OFFICE OF ATTORNEY GENERAL REGARDING RAILROAD COMMISSION CLAIM.	B310	0.20	70.00
02/06/24	DNR	TELEPHONE CONFERENCE WITH OFFICE OF ATTORNEY GENERAL REGARDING RAILROAD COMMISSION CLAIM AND POTENTIAL STIPULATION.	B310	0.30	105.00
02/06/24	DNR	CORRESPONDENCE WITH AHUJA & CONSULTANTS REGARDING TAX CALL AND RETURN PREPARATION ITEMS.	B240	0.60	210.00
02/06/24	DNR	DISCUSS RAILROAD COMMISSION CLAIM ITEMS WITH DEBORAH D. WILLIAMSON AND STIPULATION COMMENTS.	B310	0.50	175.00
02/06/24	DNR	CORRESPONDENCE WITH VENDOR REGARDING ADDRESS CHANGE.	B110	0.20	70.00
02/06/24	DNR	CORRESPONDENCE TO VICKI PALMOUR CONSULTING AND AHUJA & CONSULTANTS REGARDING VENDOR CHANGE OF ADDRESS.	B210	0.10	35.00
02/06/24	DNR	TELEPHONE CONFERENCE WITH AHUJA & CONSULTANTS REGARDING TAX RETURNS FOR 2023 TAX YEAR.	B240	0.10	35.00
02/06/24	DNR	DRAFT STIPULATION AND AGREED ORDER REGARDING RAILROAD COMMISSION CLAIM AND SETTLEMENT OF SAME; INCORPORATE RECEIVER'S COMMENTS.	B310	1.70	595.00
02/06/24	DNR	TELEPHONE CONFERENCE WITH INVESTOR REGARDING CLAIMS PROCEDURE TIMELINE.	B110	0.10	35.00
02/06/24	DNR	TELEPHONE CONFERENCE WITH INVESTOR REGARDING DISTRIBUTION INQUIRY.	B110	0.10	35.00
02/06/24	DNR	CORRESPONDENCE WITH OFFICE OF ATTORNEY GENERAL REGARDING DRAFT STIPULATION AND PROPOSED ORDER REGARDING RAILROAD COMMISSION CLAIM.	B310	0.20	70.00
02/06/24	DNR	RECEIVE AND PROCESS RECEIVER'S MAIL.	B210	0.40	140.00
02/06/24	DNR	TELEPHONE CONFERENCE WITH REID COLLINS REGARDING SETTLEMENT MOTION.	BT160	0.10	35.00
02/06/24	DNR	CORRESPONDENCE WITH REID COLLINS REGARDING REVISED SETTLEMENT MOTION.	BT160	0.20	70.00
02/07/24	DNR	REVIEW AND RESPOND TO INVESTOR INQUIRIES.	B110	1.60	560.00
02/07/24	DNR	CORRESPONDENCE WITH REID COLLINS REGARDING REVISED SETTLEMENT MOTION.	BT160	0.30	105.00
02/07/24	DNR	REVIEW REVISED SETTLEMENT MOTION.	BT160	0.40	140.00
02/08/24	DNR	CORRESPONDENCE WITH REID COLLINS REGARDING COMMENTS ON SETTLEMENT MOTION.	BT160	0.70	245.00





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02/08/24	DNR	CORRESPONDENCE WITH OIL AND GAS COUNSEL REGARDING ESCROW ITEMS WITH ENERGYNET.	B130	0.40	140.00
02/08/24	DNR	REVIEW AND RESPOND TO INVESTOR INQUIRIES.	B110	0.40	140.00
02/08/24	DNR	CORRESPONDENCE WITH INVESTOR COUNSEL REGARDING FAILURE TO DISMISS RECEIVERSHIP PARTY FROM COMPLAINT.	B110	0.40	140.00
02/08/24	DNR	TELEPHONE CONFERENCE WITH VICKI PALMOUR CONSULTING REGARDING CALL FROM RAILROAD COMMISSION FIELD INSPECTOR.	B210	0.10	35.00
02/08/24	DNR	TELEPHONE CONFERENCE WITH CONTRACT OPERATOR REGARDING RAILROAD COMMISSION FIELD INSPECTOR CALL.	B210	0.10	35.00
02/08/24	DNR	CORRESPONDENCE WITH COMPLIANCE TEAM REGARDING RAILROAD COMMISSION FIELD INSPECTOR CALL.	B210	0.60	210.00
02/08/24	DNR	CORRESPONDENCE WITH OFFICE OF THE ATTORNEY GENERAL REGARDING RAILROAD COMMISSION FIELD INSPECTOR CALL AND ABANDONMENT ISSUE.	B210	0.20	70.00
02/08/24	DNR	TELEPHONE CONFERENCE WITH DEBORAH D. WILLIAMSON REGARDING RAILROAD COMMISSION FIELD INSPECTOR CALL.	B210	0.10	35.00
02/08/24	DNR	REVIEW PACKAGE FROM VENDOR COUNSEL REGARDING NOTICE OF INTENT TO ASSERT LIEN AGAINST FARMEE.	B110	0.20	70.00
02/08/24	DNR	CORRESPONDENCE TO OIL AND GAS COUNSEL REGARDING NOTICE OF INTENT TO ASSERT LIEN REGARDING FARMEE.	B210	0.10	35.00
02/08/24	DNR	TELEPHONE CONFERENCE WITH OFFICE OF THE ATTORNEY GENERAL REGARDING RAILROAD COMMISSION FIELD INSPECTOR CALL AND ISSUE REGARDING RECEIVER'S ABANDONMENT.	B210	0.10	35.00
02/08/24	DNR	CALL WITH LOCAL COUNSEL REGARDING CASE UPDATE.	B110	0.50	175.00
02/08/24	DNR	TELEPHONE CONFERENCE WITH INVESTOR REGARDING CLAIMS PROCEDURE TIMELINE.	B110	0.10	35.00
02/08/24	DNR	PROVIDE EDITS TO ESCHEATMENT CONTRACTOR AGREEMENT.	B210	0.40	140.00
02/08/24	DNR	CORRESPONDENCE TO OIL AND GAS COUNSEL REGARDING ESCHEATMENT AGREEMENT.	B210	0.10	35.00
02/08/24	DNR	TELEPHONE CONFERENCE WITH OIL AND GAS COUNSEL REGARDING RAILROAD COMMISSION ISSUES, ESCHEATMENT, AND FARMOUT ISSUES.	B210	0.40	140.00
02/08/24	DNR	TELEPHONE CONFERENCE WITH VENDOR COUNSEL REGARDING CORRESPONDENCE REGARDING INTENT TO FILE LIEN.	B110	0.20	70.00



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02/09/24	DNR	REVIEW AND RESPOND TO INVESTOR INQUIRIES.	B110	0.20	70.00
02/09/24	DNR	CORRESPONDENCE WITH OIL AND GAS COUNSEL REGARDING COMMENTS TO ESCHEAT CONTRACTOR AGREEMENT.	B210	0.30	105.00
02/09/24	DNR	TELEPHONE CONFERENCE WITH OIL AND GAS COUNSEL REGARDING ESCHEAT PROCESS.	B210	0.10	35.00
02/09/24	DNR	REVISE ESCHEAT CONTRACTOR AGREEMENT.	B210	0.20	70.00
02/09/24	PLH	REVIEW PONZI CASE LAW AND EMAIL WITH COUNSEL ON MATTERS RELATED TO POTENTIAL SETTLEMENT WITH TIEP INVESTOR CLIENT.	B120	0.80	435.60
02/12/24	DNR	CORRESPONDENCE WITH SEC COUNSEL REGARDING CASE UPDATE CALL.	B110	0.20	70.00
02/12/24	DNR	CORRESPONDENCE WITH DEBORAH D. WILLIAMSON AND OIL AND GAS COUNSEL REGARDING ESCHEAT CONTRACTOR AGREEMENT.	B210	0.40	140.00
02/12/24	DNR	FINALIZE AND PROCESS ESCHEATMENT VENDOR AGREEMENT.	B210	0.20	70.00
02/12/24	DNR	CORRESPONDENCE WITH DEBORAH D. WILLIAMSON REGARDING NON-INVESTOR CLAIMS.	B310	0.40	140.00
02/12/24	DNR	REVIEW SUBMITTED NON-INVESTOR CLAIM REPORT.	B310	0.20	70.00
02/12/24	DNR	CORRESPONDENCE WITH STRETTO REGARDING CLAIMS REPORT ITEMS.	B310	0.20	70.00
02/12/24	DNR	CORRESPONDENCE WITH OIL AND GAS COUNSEL REGARDING ENERGYNET ESCROW.	B130	0.30	105.00
02/12/24	PLH	EMAIL AND TELEPHONE CONFERENCE WITH COUNSEL ON TIEP INVESTOR CLAIMS OF THE RECEIVER AND UNDERLYING FACTS WITH RESPECT TO TIEP INVESTOR CLIENT.	B120	1.10	598.95
02/13/24	DNR	TELEPHONE CONFERENCE WITH INVESTOR REGARDING CLAIMS PROCEDURE AND LIFE SETTLEMENTS QUESTIONS.	B110	0.20	70.00
02/13/24	DNR	TELEPHONE CONFERENCE WITH INVESTOR REGARDING CLAIMS PROCEDURE.	B110	0.20	70.00
02/13/24	DNR	CORRESPONDENCE TO STRETTO REGARDING INVESTOR CONTACT INFORMATION UPDATE.	B110	0.10	35.00
02/13/24	DNR	DISCUSS ENERGYNET ESCROW ISSUE WITH DEBORAH D. WILLIAMSON.	B130	0.10	35.00
02/13/24	DNR	CORRESPONDENCE WITH OIL AND GAS COUNSEL REGARDING ENERGYNET ESCROW STEPS.	B130	0.10	35.00
02/13/24	DNR	CORRESPONDENCE WITH REID COLLINS REGARDING STATUS	BT160	0.20	70.00



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DATE	ID	DESCRIPTION	TASK	HOURS	AMOUNT
		OF SETTLEMENT AGREEMENT.			
02/13/24	DNR	CORRESPONDENCE WITH OFFICE OF ATTORNEY GENERAL REGARDING RAILROAD COMMISSION CLAIM AND POTENTIAL STIPULATION.	B310	0.10	35.00
02/13/24	DNR	TELEPHONE CONFERENCE WITH VENDOR REGARDING CLAIMS PROCEDURE.	B110	0.20	70.00
02/13/24	DNR	RECEIVE AND PROCESS RECEIVER'S MAIL.	B210	0.30	105.00
02/13/24	DNR	CORRESPONDENCE WITH COMPLIANCE TEAM REGARDING RAILROAD COMMISSION MAIL RECEIVED.	B210	0.40	140.00
02/13/24	DNR	TELEPHONE CONFERENCE WITH LOCAL COUNSEL REGARDING TIEP DEMAND LETTERS.	B120	0.30	105.00
02/13/24	DNR	UPDATE WEBSITE CONTENT.	B110	0.30	105.00
02/13/24	DNR	CORRESPONDENCE TO LOCAL COUNSEL REGARDING CONTACT FOR TIEP DEMAND LETTERS.	B120	0.10	35.00
02/13/24	PLH	REVIEW EMAILS OF MS. BEHREND AND MS. ROMERO ON CLAIMS AGAINST TIEP INVESTOR CLIENT.	B120	0.20	108.90
02/15/24	DNR	REVIEW AND RESPOND TO INVESTOR AND VENDOR INQUIRIES.	B110	1.20	420.00
02/15/24	DNR	CORRESPONDENCE WITH STRETTO AND AHUJA & CONSULTANTS REGARDING CLAIM SUPPORT DOCUMENTATION FROM INVESTOR.	B310	0.40	140.00
02/15/24	DNR	RECEIVE AND REVIEW IBC BANK ACCOUNT ANALYSIS; SEND TO AHUJA & CONSULTANTS.	B210	0.30	105.00
02/15/24	DNR	RECEIVE AND PROCESS RECEIVER'S MAIL.	B210	1.00	350.00
02/15/24	DNR	CORRESPONDENCE WITH COMPLIANCE TEAM REGARDING RAILROAD COMMISSION MAIL RECEIVED.	B210	0.20	70.00
02/15/24	DNR	CORRESPONDENCE TO VICKI PALMOUR CONSULTING REGARDING OWNERSHIP TRANSFER CORRESPONDENCE.	B210	0.10	35.00
02/15/24	DNR	TELEPHONE CONFERENCE WITH MINERAL INTEREST OWNER'S AGENT REGARDING ABANDONMENT OF OIL AND GAS PROPERTIES.	B110	0.10	35.00
02/15/24	DNR	TELEPHONE CONFERENCE WITH VENDOR REGARDING ROYALTY CHECKS.	B110	0.20	70.00
02/15/24	DNR	PROCESS VENDOR PAYMENTS.	B210	0.20	70.00
02/15/24	DNR	TELEPHONE CONFERENCE WITH INVESTOR REGARDING CASE STATUS.	B110	0.10	35.00
02/15/24	DNR	TELEPHONE CONFERENCE WITH INVESTOR REGARDING	B110	0.20	70.00



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DATE	ID	DESCRIPTION	TASK	HOURS	AMOUNT
		CLAIMS PROCEDURE.			
02/16/24	DNR	CORRESPONDENCE WITH DEBORAH D. WILLIAMSON REGARDING DISTRIBUTION STRATEGY.	B130	0.20	70.00
02/16/24	DNR	CORRESPONDENCE WITH AHUJA & CONSULTANTS REGARDING DISTRIBUTION ANALYSIS PLANNING.	B130	0.20	70.00
02/16/24	DNR	CORRESPONDENCE WITH ENERGYNET AND CONTRACT OPERATOR REGARDING ENERGYNET ESCROW.	B130	0.40	140.00
02/16/24	DNR	CORRESPONDENCE WITH AHUJA & CONSULTANTS REGARDING TAX CALL AND OUTSTANDING ITEMS.	B240	0.50	175.00
02/16/24	DNR	CORRESPONDENCE WITH OIL AND GAS COUNSEL AND DEBORAH D. WILLIAMSON REGARDING RAILROAD COMMISSION NOTICE RECEIVED POST-ABANDONMENT.	B210	0.40	140.00
02/16/24	DNR	CORRESPONDENCE WITH OFFICE OF ATTORNEY GENERAL REGARDING RAILROAD COMMISSION NOTICE RECEIVED AND ABANDONMENT ISSUES PRESENTED.	B210	0.30	105.00
02/16/24	DNR	RECEIVE UPDATE FROM REID COLLINS REGARDING POTENTIAL SETTLEMENT.	BT160	0.10	35.00
02/16/24	DNR	CORRESPONDENCE TO SEC COUNSEL REGARDING POTENTIAL INVESTOR NOTICES.	B110	0.10	35.00
02/16/24	DNR	CALL WITH SEC COUNSEL REGARDING INVESTOR INQUIRIES.	B110	0.40	140.00
02/16/24	DNR	TELEPHONE CONFERENCE WITH OFFICE OF ATTORNEY GENERAL REGARDING RAILROAD COMMISSION CLAIM STIPULATION.	B110	0.20	70.00
02/16/24	DNR	CALL WITH DEBORAH D. WILLIAMSON REGARDING INVESTOR INQUIRIES AND DISCUSSION WITH SEC.	B110	0.20	70.00
02/17/24	DNR	CORRESPONDENCE WITH CONTRACT OPERATOR REGARDING DECEMBER AND JANUARY INVOICE.	B210	0.30	105.00
02/19/24	DNR	REVIEW AND RESPOND TO INVESTOR INQUIRIES.	B110	0.30	105.00
02/19/24	DNR	CORRESPONDENCE FROM INVESTOR COUNSEL REGARDING DISMISSAL OF VENTURES; REVIEW STIPULATION FILED REGARDING SAME.	B110	0.20	70.00
02/19/24	DNR	TELEPHONE CONFERENCE WITH DEBT COLLECTOR REGARDING STAY PROHIBITION AGAINST TAKING ACTION REGARDING BARRON PETROLEUM.	B110	0.10	35.00
02/19/24	DNR	DRAFT CORRESPONDENCE TO VENDOR COUNSEL REGARDING RECEIVERSHIP ORDER, PROHIBITION OF COLLECTION EFFORTS, AND CLAIMS PLEADINGS.	B110	0.20	70.00



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02/19/24	DNR	TELEPHONE CONFERENCE WITH INVESTOR REGARDING CLAIMS PROCEDURE.	B110	0.10	35.00
02/19/24	DNR	TELEPHONE CONFERENCE WITH CLAIM COMPANY REGARDING LETTER REGARDING ARCOIL BOND DEMAND FROM RAILROAD COMMISSION.	B110	0.10	35.00
02/19/24	DNR	REVIEW CORRESPONDENCE FROM INSURANCE COMPANY REGARDING BOND DEMAND.	B110	0.10	35.00
02/19/24	DNR	TELEPHONE CONFERENCE WITH INVESTOR REGARDING CLAIMS PROCEDURE TIMELINE AND CASE STATUS.	B110	0.10	35.00
02/19/24	DNR	CORRESPONDENCE WITH LOCAL COUNSEL REGARDING 1099S.	B240	0.30	105.00
02/19/24	DNR	DRAFT LETTER RESPONDING TO NOTICE OF INTENT TO ASSERT MINERAL LIEN.	B110	0.40	140.00
02/19/24	DNR	TELEPHONE CONFERENCE WITH INVESTOR'S MOTHER REGARDING CLAIMS PROCEDURE AND TRANSACTION SCHEDULE QUESTIONS.	B110	0.20	70.00
02/19/24	DNR	RECEIVE AND PROCESS RECEIVER'S MAIL.	B210	0.40	140.00
02/19/24	DNR	SEND RAILROAD COMMISSION CORRESPONDENCE TO COMPLIANCE TEAM.	B210	0.10	35.00
02/19/24	DNR	TELEPHONE CONFERENCE WITH ROYALTY OWNER AGENT REGARDING ABANDONMENT AND LETTERS RECEIVED.	B110	0.10	35.00
02/19/24	DNR	DRAFT RECEIVER'S RESPONSE LETTER TO INVESTORS INCLUDING INTEREST IN CLAIM AMOUNT.	B310	0.80	280.00
02/19/24	DNR	CORRESPONDENCE WITH OIL AND GAS COUNSEL REGARDING MINERAL LIEN RESPONSE LETTER.	B210	0.20	70.00
02/19/24	PLH	EMAILS WITH COUNSEL REGARDING POTENTIAL SETTLEMENT OF CLAIMS AGAINST TIEP INVESTOR CLIENTS.	B120	0.40	217.80
02/20/24	DNR	CALL WITH AHUJA & CONSULTANTS REGARDING DISTRIBUTION STRATEGY.	B130	0.20	70.00
02/20/24	DNR	CORRESPONDENCE TO SEC COUNSEL REGARDING INVESTOR INQUIRIES.	B110	0.10	35.00
02/20/24	DNR	CORRESPONDENCE WITH AHUJA & CONSULTANTS REGARDING POTENTIAL INVESTORS AND CLAIMS.	B310	0.40	140.00
02/20/24	DNR	TELEPHONE CONFERENCE WITH OIL AND GAS COUNSEL REGARDING RAILROAD COMMISSION COMPLAINTS.	B210	0.20	70.00
02/20/24	DNR	CORRESPONDENCE WITH OFFICE OF ATTORNEY GENERAL REGARDING RAILROAD COMMISSION COMPLAINTS RECEIVED.	B210	0.40	140.00



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02/20/24	DNR	CALL WITH AHUJA & CONSULTANTS REGARDING DISPUTED CLAIMS.	B310	0.90	315.00
02/20/24	DNR	CORRESPONDENCE TO DEBORAH D. WILLIAMSON REGARDING DISPUTED CLAIMS.	B310	0.10	35.00
02/20/24	DNR	TELEPHONE CONFERENCE WITH INVESTOR REGARDING CLAIMS PROCEDURE.	B110	0.20	70.00
02/20/24	DNR	DRAFT LENGTHY RESPONSE TO ROYALTY AGENT REGARDING ABANDONMENT AND ROYALTY PACKAGES ISSUED TO CLIENT.	B110	0.30	105.00
02/20/24	DNR	CORRESPONDENCE FROM AHUJA & CONSULTANTS REGARDING DISTRIBUTION METHODOLOGY.	B130	0.10	35.00
02/21/24	DNR	CORRESPONDENCE WITH DEBORAH D. WILLIAMSON REGARDING LETTER TO VENDOR COUNSEL COMMENTS.	B110	0.20	70.00
02/21/24	DNR	CALL WITH REID COLLINS AND DEBORAH D. WILLIAMSON REGARDING COMMENTS ON SETTLEMENT AGREEMENT AND MOTION.	BT160	0.70	245.00
02/21/24	DNR	TELEPHONE CONFERENCE WITH COURTROOM DEPUTY REGARDING COURT AVAILABILITY.	B110	0.20	70.00
02/21/24	DNR	CORRESPONDENCE WITH PATRICK L. HUFFSTICKLER AND DEBORAH D. WILLIAMSON REGARDING SETTLEMENT OF TIEP CAUSES OF ACTION.	B120	0.20	70.00
02/21/24	DNR	REVISE AND SEND LETTER TO VENDOR COUNSEL REGARDING NOTICE OF MINERAL LIEN.	B110	0.20	70.00
02/21/24	DNR	CORRESPONDENCE WITH REID COLLINS REGARDING OPPOSING COUNSEL'S RESPONSE TO SETTLEMENT AGREEMENT AND MOTION.	BT160	0.30	105.00
02/21/24	DNR	REVIEW REVISIONS FROM OPPOSING COUNSEL TO SETTLEMENT AGREEMENT AND MOTION.	BT160	1.00	350.00
02/21/24	DNR	CORRESPONDENCE WITH STRETTO REGARDING DISTRIBUTION LOGISTICS.	B310	0.30	105.00
02/21/24	DNR	TELEPHONE CONFERENCE WITH APPRAISAL DISTRICT COUNSEL REGARDING LATE CLAIM.	B310	0.10	35.00
02/22/24	PLH	EMAIL WITH COUNSEL ON SETTLEMENT OF RECEIVER'S CLAIMS AGAINST TIEP INVESTOR CLIENTS.	B120	0.30	163.35
02/23/24	PLH	DRAFT TIEP INVESTOR SETTLEMENT AGREEMENT.	B120	0.50	272.25
02/23/24	DNR	CORRESPONDENCE FROM STRETTO REGARDING DISTRIBUTION PLANNING.	B130	0.10	35.00
02/23/24	DNR	CORRESPONDENCE WITH REID COLLINS REGARDING	BT160	0.20	70.00



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		SETTLEMENT AGREEMENT.			
02/23/24	DNR	CORRESPONDENCE WITH AHUJA & CONSULTANTS REGARDING INVESTOR DISPUTED CLAIM SUPPORT.	B310	0.20	70.00
02/23/24	DNR	CORRESPONDENCE WITH REID COLLINS REGARDING DEFINITIONS AND POTENTIAL SETTLEMENT.	BT160	0.30	105.00
02/23/24	DNR	CORRESPONDENCE FROM SEC COUNSEL REGARDING INVESTOR INQUIRY.	B110	0.10	35.00
02/23/24	DNR	RECEIVE UPDATE FROM OFFICE OF ATTORNEY GENERAL REGARDING RAILROAD COMMISSION STIPULATION.	B310	0.10	35.00
02/26/24	DNR	CORRESPONDENCE WITH STRETTO REGARDING ORIGINAL TRANSACTION SCHEDULES.	B310	0.30	105.00
02/26/24	DNR	CORRESPONDENCE TO AHUJA & CONSULTANTS REGARDING ORIGINAL TRANSACTION SCHEDULES.	B310	0.10	35.00
02/26/24	DNR	CORRESPONDENCE WITH STRETTO REGARDING CLAIMS REPORT AND LATE-SUBMITTED CLAIMS.	B310	0.30	105.00
02/26/24	DNR	PREPARE AND FILE NOTICE OF HEARING FOR MARCH 19, 2024.	B110	0.40	140.00
02/26/24	DNR	REVIEW ORDER SETTING HEARING ON MARCH 19, 2024.	B110	0.10	35.00
02/26/24	DNR	REVIEW LATEST CLAIMS REPORT.	B310	0.30	105.00
02/26/24	DNR	TELEPHONE CONFERENCE WITH INVESTOR REGARDING CLAIMS PROCEDURE QUESTIONS.	B110	0.20	70.00
02/26/24	DNR	TELEPHONE CONFERENCE WITH INVESTOR REGARDING CLAIM PROCEDURE AND QUESTIONS ON SUBMISSION.	B110	0.10	35.00
02/26/24	DNR	TELEPHONE CONFERENCE WITH INVESTOR REGARDING QUESTIONS ON CLAIMS PROCEDURE.	B110	0.10	35.00
02/26/24	DNR	UPDATE WEBSITE CONTENT.	B110	0.30	105.00
02/26/24	DNR	DISCUSS CAUSES OF ACTION AND PENDING SETTLEMENTS WITH PATRICK L. HUFFSTICKLER.	BT160	0.40	140.00
02/26/24	DNR	DISCUSS VENDOR PAYMENTS WITH DEBORAH D. WILLIAMSON.	B210	0.30	105.00
02/26/24	DNR	PROCESS VENDOR PAYMENTS.	B210	0.20	70.00
02/26/24	DNR	RECEIVE JANUARY STATEMENT FROM GULF COAST; SEND TO COMPLIANCE TEAM; RECEIVE REVISED OF SAME; SEND REVISED TO COMPLIANCE TEAM.	B210	0.40	140.00
02/26/24	DNR	REVIEW REVISED SETTLEMENT AGREEMENT.	BT160	0.60	210.00
02/26/24	DNR	CORRESPONDENCE WITH REID COLLINS REGARDING COMMENTS ON FURTHER REVISED SETTLEMENT AGREEMENT.	BT160	0.40	140.00



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DEBORAH WILLIAMSON

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DATE	ID	DESCRIPTION	TASK	HOURS	AMOUNT
02/26/24	DNR	CORRESPONDENCE WITH AHUJA & CONSULTANTS REGARDING 2023 TAX YEAR RETURNS.	B240	0.20	70.00
02/26/24	DNR	CORRESPONDENCE WITH AHUJA & CONSULTANTS REGARDING ADDITIONAL TRANSACTION SCHEDULES.	B310	0.50	175.00
02/26/24	DNR	DISCUSS WITH DEBORAH D. WILLIAMSON CERTAIN DISPUTED INVESTOR CLAIMS.	B310	0.20	70.00
02/26/24	DNR	REVIEW AND RESPOND TO INVESTOR INQUIRIES.	B110	0.20	70.00
02/26/24	DNR	REVIEW ADDITIONAL TRANSACTION SCHEDULE SPREADSHEET FROM AHUJA & CONSULTANTS.	B310	0.20	70.00
02/26/24	DNR	REVISE BAHAMAS MOTION.	B120	0.70	245.00
02/26/24	DNR	RECEIVE AND PROCESS RECEIVER'S MAIL.	B210	0.40	140.00
02/26/24	DNR	SEND RAILROAD COMMISSION MAIL RECEIVED TO COMPLIANCE TEAM.	B210	0.10	35.00
02/26/24	PLH	PREPARE SETTLEMENT AGREEMENTS FOR TIEP INVESTOR SETTLEMENTS AND EMAIL ON SAME.	B120	1.80	980.10
02/27/24	DNR	DISCUSS WITH DEBORAH D. WILLIAMSON INVESTOR INQUIRY RESPONSE.	B110	0.10	35.00
02/27/24	DNR	CORRESPONDENCE TO SEC COUNSEL REGARDING INVESTOR INQUIRY.	B110	0.10	35.00
02/27/24	DNR	REVIEW AND RESPOND TO INVESTOR INQUIRIES.	B110	0.70	245.00
02/27/24	DNR	CORRESPONDENCE WITH REID COLLINS REGARDING SETTLEMENT MOTION COMMENTS AND REVISIONS.	BT160	0.40	140.00
02/27/24	DNR	RESEARCH CASE LAW SUPPORTING SETTLEMENT AGREEMENT AND FURTHER REVISE SETTLEMENT AGREEMENT MOTION AND PROPOSED ORDER.	BT160	3.60	1,260.00
02/27/24	DNR	CALL WITH AHUJA & CONSULTANTS REGARDING DISPUTED CLAIMS AND ISSUES ON SAME AND DISTRIBUTION RESEARCH.	B310	0.90	315.00
02/27/24	DNR	TELEPHONE CONFERENCE WITH INVESTOR REGARDING CLAIMS PROCEDURE AND NOT RECEIVING CLAIMS PACKET.	B110	0.20	70.00
02/27/24	DNR	CORRESPONDENCE WITH STRETTO REGARDING INVESTOR CLAIMS PACKET.	B310	0.20	70.00
02/27/24	DNR	CORRESPONDENCE WITH STRETTO REGARDING ADDITIONAL TRANSACTION SCHEDULES.	B310	0.30	105.00
02/27/24	DNR	TELEPHONE CONFERENCE WITH INVESTOR REGARDING CLAIMS PROCEDURE AND STATUS OF RECEIVER RESPONSES.	B110	0.10	35.00
02/27/24	DNR	CORRESPONDENCE TO INSURER CLAIM CONTACT REGARDING	B110	0.20	70.00





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DATE	ID	DESCRIPTION	TASK	HOURS	AMOUNT
		RAILROAD COMMISSION CORRESPONDENCE AND ARCOOIL CORP. BOND.			
02/27/24	DNR	CORRESPONDENCE WITH INVESTOR REGARDING CLAIMS PACKET AND QUESTIONS ON SAME.	B110	0.20	70.00
02/27/24	DNR	REVIEW DISTRIBUTION MEMO FROM AHUJA & CONSULTANTS.	B130	0.40	140.00
02/27/24	PLH	ADDRESS TIEP INVESTOR SETTLEMENT ISSUES AND EMAIL ON SAME WITH TIEP INVESTOR COUNSEL.	B120	0.80	435.60
02/28/24	DNR	CONTINUE DRAFTING RESPONSE LETTER TEMPLATE REGARDING INTEREST IN CLAIM AMOUNT.	B310	0.70	245.00
02/28/24	DNR	CORRESPONDENCE WITH STRETTO REGARDING ADDITIONAL TRANSACTION SCHEDULES AND COMMENTS ON SAME.	B310	0.60	210.00
02/28/24	DNR	SEND ADDITIONAL TRANSACTION SCHEDULES TO AHUJA & CONSULTANTS; CORRESPONDENCE WITH AHUJA & CONSULTANTS AND STRETTO REGARDING REVISIONS TO SAME.	B310	0.30	105.00
02/28/24	DNR	RECEIVE AND REVIEW ADDITIONAL TRANSACTION SCHEDULES FROM STRETTO.	B310	0.40	140.00
02/28/24	DNR	TELEPHONE CONFERENCE WITH INVESTOR REGARDING CLAIMS PROCEDURE TIMELINE AND STATUS OF DISTRIBUTION.	B110	0.10	35.00
02/28/24	DNR	CORRESPONDENCE WITH STRETTO REGARDING CLAIM SUBMISSION ACCESS ISSUES.	B310	0.40	140.00
02/28/24	DNR	CORRESPONDENCE TO OIL AND GAS COUNSEL AND DEBORAH D. WILLIAMSON REGARDING VENDOR COUNSEL CALL REGARDING FARMOUT.	B210	0.10	35.00
02/28/24	DNR	CORRESPONDENCE WITH INSURER CLAIM SPECIALIST REGARDING ARCOOIL CORP. BOND AND LETTER FROM RAILROAD COMMISSION.	B110	0.40	140.00
02/28/24	DNR	DRAFT KNOWN INVESTOR DISPUTED CLAIM ELECTION FORM.	B310	0.50	175.00
02/28/24	DNR	CORRESPONDENCE WITH STRETTO REGARDING INVESTOR CLAIM PACKETS.	B310	0.20	70.00
02/28/24	DNR	TELEPHONE CONFERENCE WITH OIL AND GAS COUNSEL REGARDING VENDOR CALL RESPONSE.	B210	0.10	35.00
02/28/24	DNR	DISCUSS WITH DEBORAH D. WILLIAMSON DISPUTED CLAIMS RESPONSES FOR INVESTORS.	B310	0.20	70.00
02/28/24	DNR	CORRESPONDENCE WITH COMPLIANCE TEAM REGARDING ABANDONED WELLS.	B210	0.30	105.00
02/28/24	DNR	CORRESPONDENCE WITH FARMEE COUNSEL REGARDING	B210	0.30	105.00



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DATE	ID	DESCRIPTION	TASK	HOURS	AMOUNT
		STATUS OF REIMBURSEMENT OF EXPENSES TO RECEIVERSHIP ESTATES AND VENDOR COUNSEL CONCERNS.			
02/28/24	DNR	TELEPHONE CONFERENCE WITH VENDOR COUNSEL REGARDING FARMOUT CONCERNS.	B110	0.10	35.00
02/28/24	DNR	CORRESPONDENCE TO SEC COUNSEL REGARDING FARMOUT UPDATE.	B110	0.10	35.00
02/28/24	DNR	DRAFT AND SEND RESPONSES TO INVESTOR'S DISPUTED CLAIM AND INCORPORATE AMENDED TRANSACTION SCHEDULE.	B310	2.00	700.00
02/28/24	DNR	RECEIVE AND RESPOND TO INVESTOR INQUIRIES.	B110	0.20	70.00
02/28/24	DNR	ANALYZE INVESTOR DISPUTED CLAIM SUBMISSIONS.	B310	0.60	210.00
02/28/24	DNR	CORRESPONDENCE TO REID COLLINS REGARDING SETTLEMENT AGREEMENT MOTION.	BT160	0.10	35.00
02/29/24	DNR	RECEIVE AND REVIEW FARMEE UPDATE; CORRESPONDENCE WITH OIL AND GAS COUNSEL ON SAME.	B210	0.40	140.00
02/29/24	DNR	CORRESPONDENCE TO SEC COUNSEL REGARDING FARMOUT UPDATE.	B110	0.10	35.00
02/29/24	DNR	CORRESPONDENCE WITH INVESTOR REGARDING DISPUTED CLAIM ELECTION FORM.	B110	0.20	70.00
02/29/24	DNR	CORRESPONDENCE TO STRETTO AND AHUJA AND CONSULTANTS REGARDING INVESTOR ELECTION FORM AND UPDATED ALLOWED CLAIM AMOUNT.	B310	0.10	35.00
02/29/24	DNR	CORRESPONDENCE WITH STRETTO AND AHUJA AND CONSULTANTS REGARDING REVISED TRANSACTION SCHEDULE.	B310	0.20	70.00
02/29/24	DNR	CORRESPONDENCE TO SEC COUNSEL REGARDING ADDITIONAL TRANSACTION SCHEDULES.	B110	0.10	35.00
02/29/24	DNR	REVISE RECEIVER'S RESPONSES TO INVESTORS' CLAIM SUBMISSIONS REGARDING REVISED TRANSACTION SCHEDULES.	B110	0.20	70.00
02/29/24	DNR	PREPARE AND SEND RECEIVER RESPONSE TO INVESTOR DISPUTED CLAIM SUBMISSION.	B310	0.40	140.00
02/29/24	DNR	CORRESPONDENCE WITH OIL AND GAS COUNSEL REGARDING PLUGGING VENDOR CORRESPONDENCE.	B210	0.40	140.00
02/29/24	DNR	CORRESPONDENCE WITH STRETTO REGARDING RECEIVER RESPONSE PROTOCOL TO INVESTOR DISPUTED CLAIMS.	B310	0.20	70.00
02/29/24	DNR	CORRESPONDENCE WITH REID COLLINS REGARDING SETTLEMENT AGREEMENT AND MOTION COMMENTS FROM OPPOSING COUNSEL.	BT160	0.20	70.00



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DATE	ID	DESCRIPTION	TASK	HOURS	AMOUNT
02/29/24	DNR	CORRESPONDENCE WITH STRETTO REGARDING CLAIMS REPORT.	B310	0.20	70.00
02/29/24	DNR	REVIEW LATEST CLAIMS REPORT.	B310	0.30	105.00
02/29/24	DNR	CORRESPONDENCE WITH AHUJA AND CONSULTANTS REGARDING BAHAMAS TRACING.	B120	0.60	210.00
02/29/24	DNR	TELEPHONE CONFERENCES WITH AHUJA AND CONSULTANTS REGARDING FORENSIC TRACING REQUEST.	B120	0.30	105.00
02/29/24	PLH	EMAILS WITH TIEP INVESTORS' COUNSEL ON SETTLEMENT OF CLAIMS.	B120	0.30	163.35
02/29/24	DNR	DISCUSS WITH DEBORAH D. WILLIAMSON FINANCIAL AND BANK RECORDS REGARDING BAHAMAS.	B120	0.40	140.00
02/29/24	DNR	ANALYZE FINANCIAL DOCUMENTS AND OTHER RECORDS REGARDING BAHAMAS.	B120	4.00	1,400.00
02/29/24	DNR	CONTINUE DRAFTING BAHAMAS MOTION.	B120	3.00	1,050.00
02/29/24	DNR	CORRESPONDENCE TO OAG REGARDING STATUS OF RAILROAD COMMISSION OF TEXAS CLAIM STIPULATION.	B310	0.10	35.00
02/29/24	DNR	CORRESPONDENCE TO AHUJA AND CONSULTANTS REGARDING TAX DOCUMENTATION FOR ARCOOIL AND BARRON PETROLEUM FOR 2020 AND 2021.	B240	0.20	70.00
<b>TOTAL</b>				<b>91.90</b>	<b>\$34,032.20</b>



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**BILLING SUMMARY**

<b>ID</b>	<b>TIMEKEEPER</b>	<b>TITLE</b>	<b>HOURS</b>	<b>RATE</b>	<b>AMOUNT</b>
DNR	DANIELLE R. BEHREND	PARTICIPATING MEMBER	82.30	350.00	28,805.00
PLH	PATRICK HUFFSTICKLER	PARTICIPATING MEMBER	9.60	544.50	5,227.20
	<b>TOTAL</b>		<b>91.90</b>		<b>\$34,032.20</b>



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**DISBURSEMENTS**

<b>DATE</b>	<b>DESCRIPTION</b>	<b>QUANTITY</b>	<b>RATE</b>	<b>AMOUNT</b>
	PHOTOCOPIES	24.00	0.10	2.40
	PRINTING EXPENSES	1,576.00	0.10	157.60
	RELATIVITY DATA HOSTING	1.00	3,320.00	3,320.00
	SCANNING	230.00	0.10	23.00
	<b>TOTAL DISBURSEMENTS</b>			<b>3,503.00</b>



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**TASK SUMMARY**

<b>TASK</b>	<b>TASK DESCRIPTION</b>	<b>HOURS</b>	<b>AMOUNT</b>
B110	CASE ADMINISTRATION	20.40	7,140.00
B120	ASSET ANALYSIS AND RECOVERY	19.20	8,587.20
B130	ASSET DISPOSITION	2.80	980.00
B210	BUSINESS OPERATIONS	14.30	5,005.00
B240	TAX ISSUES	2.00	700.00
B310	CLAIMS ADMINISTRATION & OBJECT	22.00	7,700.00
BT160	LITIGATION CONSULTING	11.20	3,920.00
	<b>TOTAL</b>	<b>91.90</b>	<b>34,032.20</b>

**EXPENSE SUMMARY**

PHOTOCOPIES	2.40
SCANNING	23.00
PRINTING EXPENSES	157.60
RELATIVITY DATA HOSTING	3,320.00
<b>TOTAL</b>	<b>3,503.00</b>



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**

APRIL 24, 2024  
MATTER #: 122686.000002  
INVOICE #: 3582553

*FOR PROFESSIONAL SERVICES RENDERED*

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

FEES	\$	50,217.45
DISBURSEMENTS		300.80
<b>INVOICE TOTAL</b>	<b>\$</b>	<b>50,518.25</b>



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

DATE	ID	DESCRIPTION	TASK	HOURS	AMOUNT
03/01/24	DNR	CORRESPONDENCE WITH GULF COAST GAS REGARDING WIRE TO RECEIVER FOR PRIOR MONTHS.	B210	0.40	140.00
03/01/24	DNR	CORRESPONDENCE WITH COMPLIANCE TEAM REGARDING GULF COAST WIRE.	B210	0.20	70.00
03/01/24	DNR	RECEIVE UPDATE FROM OFFICE OF ATTORNEY GENERAL REGARDING RAILROAD CONSULTANTS CLAIM STIPULATION STATUS.	B310	0.10	35.00
03/01/24	DNR	CORRESPONDENCE WITH AHUJA & CONSULTANTS AND STRETTO REGARDING REVISIONS TO AMENDED TRANSACTION SCHEDULES.	B310	0.40	140.00
03/01/24	DNR	REVIEW FINANCIAL AND TAX DOCUMENTS REGARDING BAHAMAS TRANSFERS.	B120	0.40	140.00
03/01/24	DNR	CORRESPONDENCE WITH DEBORAH D. WILLIAMSON AND AHUJA & CONSULTANTS REGARDING BAHAMAS FINANCIAL DOCUMENTATION AND SUPPORT FOR MOTION.	B120	0.60	210.00
03/01/24	DNR	CONTINUE DRAFTING BAHAMAS MOTION.	B120	0.50	175.00
03/01/24	DNR	REVIEW FINALIZED AMENDED TRANSACTION SCHEDULE FOR INVESTOR.	B310	0.10	35.00
03/01/24	DNR	CORRESPONDENCE WITH AHUJA & CONSULTANTS REGARDING ADDITIONAL TRANSACTION SCHEDULES.	B310	0.10	35.00
03/01/24	DNR	DRAFT RECEIVER'S RESPONSE TO INVESTOR DISPUTED CLAIMS REGARDING REVISED TRANSACTION SCHEDULES.	B310	0.40	140.00
03/01/24	DNR	REVIEW BAHAMAS TRACING FROM AHUJA & CONSULTANTS.	B120	0.40	140.00
03/01/24	DNR	CORRESPONDENCE WITH AHUJA & CONSULTANTS REGARDING BAHAMAS TRACING.	B120	0.60	210.00
03/01/24	DNR	CORRESPONDENCE WITH COMPLIANCE TEAM REGARDING GATHERER CALL REGARDING SHURLEY WELLS.	B210	0.60	210.00
03/01/24	DNR	CALL WITH DEBORAH D. WILLIAMSON REGARDING BAHAMAS TRACING.	B120	0.10	35.00
03/01/24	DNR	CALL WITH AHUJA & CONSULTANTS REGARDING BAHAMAS TRACING.	B120	0.40	140.00
03/04/24	DNR	CORRESPONDENCE TO OIL AND GAS COUNSEL AND DEBORAH D. WILLIAMSON REGARDING RAILROAD COMMISSION CLAIM	B310	0.10	35.00





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DATE	ID	DESCRIPTION	TASK	HOURS	AMOUNT
		STIPULATION COMMENTS FROM OFFICE OF ATTORNEY GENERAL.			
03/04/24	DNR	RECEIVE INVESTOR DISPUTED CLAIM ELECTION FORM; CORRESPONDENCE WITH INVESTOR REGARDING SAME.	B310	0.30	105.00
03/04/24	DNR	CORRESPONDENCE WITH AHUJA & CONSULTANTS REGARDING BAHAMAS TRACING.	B120	0.20	70.00
03/04/24	DNR	RECEIVE AND PROCESS RECEIVER'S MAIL.	B210	0.30	105.00
03/04/24	DNR	CORRESPONDENCE TO AHUJA & CONSULTANTS REGARDING LETTER FROM COMPTROLLER.	B240	0.10	35.00
03/04/24	DNR	REVIEW POTENTIAL INVESTOR SPREADSHEET FROM AHUJA & CONSULTANTS.	B310	0.20	70.00
03/04/24	DNR	CORRESPONDENCE WITH PATRICK L. HUFFSTICKLER AND DEBORAH D. WILLIAMSON REGARDING COMMENTS TO OPPOSING COUNSEL'S SETTLEMENT TERMS.	BT160	0.20	70.00
03/04/24	DNR	CORRESPONDENCE FROM WY SOS REGARDING ANNUAL REPORTING.	B240	0.20	70.00
03/04/24	DNR	CORRESPONDENCE TO AHUJA & CONSULTANTS REGARDING WY SOS CORRESPONDENCE REGARDING ANNUAL REPORTING.	B240	0.10	35.00
03/04/24	DNR	CORRESPONDENCE WITH REID COLLINS AND DEBORAH D. WILLIAMSON REGARDING SETTLEMENT MOTION AND AGREEMENT COMMENTS.	BT160	0.80	280.00
03/04/24	DNR	CORRESPONDENCE FROM OFFICE OF ATTORNEY GENERAL REGARDING RAILROAD COMMISSION CLAIM STIPULATION COMMENTS.	B310	0.10	35.00
03/04/24	DNR	RECEIVE AND REVIEW IBC BANK STATEMENTS FOR FEBRUARY 2024; SEND TO AHUJA & CONSULTANTS.	B210	0.30	105.00
03/04/24	DNR	TELEPHONE CONFERENCE WITH DEBORAH D. WILLIAMSON REGARDING SETTLEMENT MOTION COMMENTS.	BT160	0.20	70.00
03/04/24	DNR	REVISE SETTLEMENT MOTION.	BT160	0.10	35.00
03/04/24	DNR	TELEPHONE CONFERENCE WITH DEBORAH D. WILLIAMSON REGARDING OFFICE OF ATTORNEY GENERAL COMMENTS TO RAILROAD COMMISSION CLAIM STIPULATION.	B310	0.10	35.00
03/04/24	DNR	CORRESPONDENCE TO STRETTO AND AHUJA & CONSULTANTS REGARDING INVESTOR ELECTION FORM.	B310	0.10	35.00
03/04/24	DNR	CORRESPONDENCE WITH AHUJA & CONSULTANTS REGARDING DISPUTED CLAIMS OF INVESTORS.	B310	0.20	70.00
03/04/24	DNR	CORRESPONDENCE TO SEC COUNSEL REGARDING DISPUTED	B110	0.10	35.00



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DEBORAH WILLIAMSON

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DATE	ID	DESCRIPTION	TASK	HOURS	AMOUNT
		CLAIMS OF INVESTORS AND UPDATE ON SAME.			
03/04/24	DNR	CORRESPONDENCE WITH OIL AND GAS COUNSEL REGARDING LETTERS FROM OPERATOR ON 2 WELLS.	B210	0.20	70.00
03/04/24	PLH	REVIEW EMAIL AND PROPOSED REVISIONS TO SETTLEMENT AGREEMENT FROM TIEP INVESTOR COUNSEL AND EMAILS WITH MS. WILLIAMSON AND MS. BEHREND ON SAME.	B120	0.40	217.80
03/05/24	DNR	DRAFT AND SEND RECEIVER'S RESPONSES TO INVESTORS DISPUTED CLAIMS SUBMISSIONS WITH REVISED TRANSACTION SCHEDULES.	B310	3.00	1,050.00
03/05/24	DNR	PREPARE AND SEND RECEIVER'S RESPONSES TO INVESTORS DISPUTED CLAIM SUBMISSIONS.	B310	0.40	140.00
03/05/24	DNR	RECEIVE AND PROCESS RECEIVER'S MAIL.	B210	0.30	105.00
03/05/24	DNR	CORRESPONDENCE WITH STRETTO AND AHUJA & CONSULTANTS REGARDING RESPONSES OF RECEIVER TO DISPUTED INVESTOR CLAIMS FOR CLAIM FOLDERS.	B310	0.60	210.00
03/05/24	DNR	CORRESPONDENCE WITH SEC COUNSEL REGARDING RECORDS ACCESS.	B110	0.20	70.00
03/05/24	DNR	CORRESPONDENCE WITH OIL AND GAS COUNSEL REGARDING RAILROAD COMMISSION EDITS TO CLAIM STIPULATION.	B310	0.50	175.00
03/05/24	DNR	DISCUSS WITH DEBORAH D. WILLIAMSON INTERNATIONAL WIRE FOR DATA HOSTING; PROCESS SAME.	B210	0.20	70.00
03/05/24	DNR	CORRESPONDENCE WITH YAIR BARAHONA REGARDING WIRE FOR DATA HOSTING.	B110	0.20	70.00
03/05/24	DNR	CALL WITH OFFICE OF ATTORNEY GENERAL REGARDING SHURLEY WELL PURCHASER UPDATE.	B210	0.20	70.00
03/05/24	DNR	CORRESPONDENCE WITH OFFICE OF ATTORNEY GENERAL REGARDING SHURLEY WELLS ABANDONED.	B210	0.30	105.00
03/05/24	DNR	CORRESPONDENCE TO COMPLIANCE TEAM REGARDING SHURLEY WELLS.	B210	0.10	35.00
03/05/24	DNR	CALL WITH AHUJA & CONSULTANTS AND DEBORAH D. WILLIAMSON REGARDING OUTSTANDING TAX AND ACCOUNTING ITEMS.	B240	0.70	245.00
03/05/24	DNR	CORRESPONDENCE WITH STRETTO REGARDING INVESTOR MATRIX.	B110	0.30	105.00
03/05/24	DNR	DISCUSS TIEP SETTLEMENT PROPOSAL WITH PATRICK L. HUFFSTICKLER.	BT160	0.20	70.00
03/05/24	DNR	CORRESPONDENCE TO OIL AND GAS COUNSEL REGARDING	B210	0.10	35.00



DEBORAH D WILLIAMSON  
DEBORAH WILLIAMSON

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DATE	ID	DESCRIPTION	TASK	HOURS	AMOUNT
		ADDITIONAL MINERAL LIENS.			
03/05/24	DNR	DRAFT AND SEND LETTER TO VENDOR COUNSEL REGARDING RECEIVERSHIP ORDER AND RESPONSE TO MINERAL LIENS REGARDING RECEIVERSHIP PROPERTY.	B210	0.40	140.00
03/05/24	PLH	OFFICE CONFERENCES WITH MS. BEHREND AND MS. WILLIAMSON ON TIEP INVESTOR SETTLEMENT ISSUES.	B120	0.40	217.80
03/07/24	DNR	RECEIVE AND PROCESS RECEIVER'S MAIL.	B210	0.30	105.00
03/07/24	DNR	CORRESPONDENCE TO AHUJA & CONSULTANTS REGARDING IRS LETTER.	B240	0.10	35.00
03/07/24	DNR	REVIEW AND RESPOND TO INVESTOR INQUIRIES.	B110	0.60	210.00
03/07/24	DNR	CORRESPONDENCE WITH AHUJA & CONSULTANTS REGARDING BAHAMAS DEEDS.	B120	0.20	70.00
03/07/24	DNR	CORRESPONDENCE WITH REID COLLINS REGARDING SETTLEMENT AGREEMENT REVISIONS.	BT160	0.40	140.00
03/07/24	DNR	CORRESPONDENCE WITH INVESTORS REGARDING DISPUTED CLAIM ELECTION FORMS.	B110	0.40	140.00
03/07/24	DNR	CORRESPONDENCE WITH STRETTO REGARDING AUDIT.	B110	0.20	70.00
03/07/24	DNR	CALL WITH OIL AND GAS COUNSEL REGARDING FARMOUT AGREEMENT; CORRESPONDENCE ON SAME.	B210	0.40	140.00
03/07/24	DNR	DRAFT LETTER TO SEC COUNSEL REGARDING FILES.	B110	0.20	70.00
03/07/24	DNR	CORRESPONDENCE WITH SEC COUNSEL REGARDING LETTER FROM RECEIVER'S COUNSEL.	B110	0.10	35.00
03/07/24	DNR	CORRESPONDENCE WITH AHUJA & CONSULTANTS REGARDING NON-PUBLIC DOCUMENTS.	B110	0.30	105.00
03/07/24	DNR	REVIEW OPPOSING COUNSEL'S REVISIONS TO SETTLEMENT AGREEMENT; PROVIDE ADDITIONAL COMMENTS TO REID COLLINS.	BT160	0.60	210.00
03/07/24	DNR	TELEPHONE CONFERENCE WITH ROYALTY OWNER REGARDING ROYALTY PAYMENTS ISSUED.	B110	0.10	35.00
03/07/24	DNR	CALL WITH REID COLLINS REGARDING REVISIONS TO SETTLEMENT AGREEMENT.	BT160	0.20	70.00
03/07/24	DNR	TELEPHONE CONFERENCE WITH INVESTORS REGARDING RECEIVER'S RESPONSE TO CLAIM SUBMISSION.	B110	0.20	70.00
03/07/24	DNR	TELEPHONE CONFERENCE WITH INVESTOR REGARDING CLAIMS PROCEDURE AND CASE STATUS.	B110	0.30	105.00
03/07/24	DNR	TELEPHONE CONFERENCE WITH INVESTOR COUNSEL	B110	0.10	35.00



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DATE	ID	DESCRIPTION	TASK	HOURS	AMOUNT
		REGARDING CASE BACKGROUND.			
03/07/24	DNR	REVIEW RESPONSE LETTER FROM VENDOR COUNSEL REGARDING MINERAL LIEN FILING.	B110	0.30	105.00
03/07/24	DNR	CORRESPONDENCE TO OIL AND GAS COUNSEL REGARDING VENDOR COUNSEL LETTER RE MINERAL LIEN FILING.	B210	0.20	70.00
03/07/24	DNR	CORRESPONDENCE TO INVESTOR COUNSEL REGARDING RECEIVERSHIP ORDER.	B110	0.10	35.00
03/07/24	DNR	CORRESPONDENCE WITH REID COLLINS REGARDING FURTHER REVISED SETTLEMENT AGREEMENT.	BT160	0.20	70.00
03/07/24	DNR	CORRESPONDENCE FROM VENDOR COUNSEL REGARDING LETTER REGARDING MINERAL LIENS AND RECEIVERSHIP ORDER.	B110	0.10	35.00
03/07/24	DNR	TELEPHONE CONFERENCE WITH INVESTOR REGARDING CLAIMS PROCEDURE AND QUESTIONS ON POTENTIAL DISTRIBUTION.	B110	0.20	70.00
03/07/24	DNR	CORRESPONDENCE TO STRETTO REGARDING INVESTOR COUNSEL MATRIX ADDITION.	B110	0.10	35.00
03/07/24	DNR	CORRESPONDENCE WITH STRETTO REGARDING DISPUTED CLAIM ELECTION FORMS.	B310	0.20	70.00
03/07/24	PLH	TELEPHONE CONFERENCE AND EMAILS WITH MS. BEHREND'S ON NON-PUBLIC INFORMATION ISSUES FOR RECEIVERSHIP AND EMAILS WITH TIEP INVESTOR COUNSEL ON SETTLEMENT.	B120	0.80	435.60
03/08/24	DNR	CORRESPONDENCE WITH INVESTORS REGARDING DISPUTED CLAIM ELECTION FORMS.	B110	0.60	210.00
03/08/24	DNR	CORRESPONDENCE WITH STRETTO AND AHUJA & CONSULTANTS REGARDING INVESTOR ELECTION FORMS.	B310	0.40	140.00
03/08/24	DNR	CORRESPONDENCE WITH STRETTO REGARDING CLAIMS REPORT.	B310	0.30	105.00
03/08/24	DNR	REVIEW LATEST CLAIMS REPORT.	B310	0.20	70.00
03/08/24	DNR	CORRESPONDENCE WITH OIL AND GAS COUNSEL REGARDING VENDOR COUNSEL LETTER REGARDING MINERAL LIENS.	B210	0.10	35.00
03/08/24	DNR	CORRESPONDENCE WITH INVESTOR COUNSEL REGARDING TRANSACTION SCHEDULE AND CLAIMS PROCEDURE.	B110	0.40	140.00
03/08/24	DNR	CORRESPONDENCE TO AHUJA & CONSULTANTS REGARDING DISPUTED CLAIM OF INVESTOR AND RESEARCH ON SAME.	B310	0.30	105.00
03/08/24	DNR	DRAFT RECEIVER'S RESPONSES TO INVESTOR DISPUTED CLAIM SUBMISSIONS.	B310	0.40	140.00



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DATE	ID	DESCRIPTION	TASK	HOURS	AMOUNT
03/08/24	DNR	CORRESPONDENCE WITH DEBORAH D. WILLIAMSON AND PATRICK L. HUFFSTICKLER REGARDING TIEP SETTLEMENT OFFERS.	BT160	0.50	175.00
03/08/24	DNR	TELEPHONE CONFERENCE WITH OIL AND GAS COUNSEL REGARDING FARMOUT AGREEMENT.	B210	0.90	315.00
03/08/24	DNR	CORRESPONDENCE TO DEBORAH D. WILLIAMSON REGARDING CALL ON FARMOUT AGREEMENT.	B210	0.10	35.00
03/08/24	DNR	CORRESPONDENCE TO DARRELL R. JONES REGARDING VAL VERDE METER SPREADSHEET.	B210	0.10	35.00
03/08/24	DNR	CORRESPONDENCE WITH VICKI PALMOUR CONSULTING AND OIL AND GAS COUNSEL REGARDING FARMOUT PRODUCTION AND GULF COAST STATEMENTS.	B210	0.30	105.00
03/08/24	PLH	EMAILS WITH TIEP INVESTOR COUNSEL ON SETTLEMENT AND EMAILS WITH MS. WILLIAMSON AND MS. BEHREND'S ON SAME.	B120	0.40	217.80
03/11/24	DNR	REVIEW LETTER FROM SEC COUNSEL REGARDING DOCUMENT ACCESS.	B110	0.10	35.00
03/11/24	DNR	TELEPHONE CONFERENCE WITH INVESTOR REGARDING CLAIMS PROCEDURE TIMELINE.	B110	0.10	35.00
03/11/24	DNR	TELEPHONE CONFERENCE WITH VENDOR COUNSEL REGARDING MINERAL LIENS.	B110	0.20	70.00
03/11/24	DNR	CORRESPONDENCE WITH AHUJA & CONSULTANTS REGARDING IRS LETTER RECEIVED.	B240	0.30	105.00
03/11/24	DNR	FURTHER REVISE SETTLEMENT AGREEMENT.	BT160	0.20	70.00
03/11/24	DNR	CORRESPONDENCE TO SEC COUNSEL REGARDING UPDATE CALL.	B110	0.10	35.00
03/11/24	DNR	CORRESPONDENCE TO SEC COUNSEL REGARDING CLAIM SUBMISSIONS.	B110	0.10	35.00
03/11/24	DNR	DRAFT RECEIVER'S RESPONSES TO INVESTORS' DISPUTED CLAIM SUBMISSIONS.	B310	1.30	455.00
03/11/24	DNR	CORRESPONDENCE WITH INVESTORS REGARDING DISPUTED CLAIM ELECTION FORMS.	B110	0.40	140.00
03/11/24	DNR	CORRESPONDENCE WITH INVESTORS REGARDING RECEIVER'S RESPONSES TO INVESTOR DISPUTED CLAIM SUBMISSIONS.	B110	0.40	140.00
03/11/24	DNR	CORRESPONDENCE WITH OIL AND GAS COUNSEL REGARDING FARMOUT AGREEMENT.	B210	0.20	70.00
03/11/24	DNR	CORRESPONDENCE WITH SEC COUNSEL REGARDING	B110	0.20	70.00



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		DOCUMENT ACCESS.			
03/11/24	DNR	CORRESPONDENCE WITH AHUJA & CONSULTANTS REGARDING POTENTIAL INVESTOR DOCUMENTS FOR CLAIM SUBMISSIONS.	B310	0.30	105.00
03/11/24	DNR	CORRESPONDENCE WITH STRETTO AND AHUJA & CONSULTANTS REGARDING DISPUTED CLAIM ELECTION FORMS.	B310	0.20	70.00
03/11/24	DNR	REVIEW AND RESPOND TO INVESTOR INQUIRIES.	B110	0.60	210.00
03/11/24	DNR	RECEIVE HEARING CREDENTIALS FROM COURTROOM DEPUTY; SEND TO VARIOUS RETAINED PROFESSIONALS OF RECEIVER.	B110	0.10	35.00
03/11/24	DNR	TELEPHONE CONFERENCE WITH INVESTOR REGARDING CLAIMS PROCEDURE AND TRANSACTION SCHEDULE QUESTIONS.	B110	0.10	35.00
03/11/24	DNR	TELEPHONE CONFERENCE WITH INVESTOR REGARDING TRANSACTION SCHEDULE AND CUSTODIAN QUESTIONS.	B110	0.10	35.00
03/11/24	DNR	CORRESPONDENCE WITH REID COLLINS REGARDING SETTLEMENT AGREEMENT COMMENTS AND OUTSTANDING ITEMS.	BT160	0.50	175.00
03/11/24	DNR	REVIEW LATEST REVISED SETTLEMENT AGREEMENT.	BT160	0.30	105.00
03/11/24	DNR	CALL WITH AHUJA & CONSULTANTS REGARDING COMPTROLLER AND IRS MAIL RECEIVED.	B240	0.20	70.00
03/11/24	DNR	DISCUSS WITH DEBORAH D. WILLIAMSON TAX RETURN ITEMS.	B240	0.10	35.00
03/11/24	DNR	CORRESPONDENCE WITH STRETTO REGARDING COUNSEL MATRIX.	B110	0.10	35.00
03/11/24	DNR	CORRESPONDENCE TO STRETTO REGARDING NON-INVESTOR CLAIMS SUBMITTED.	B310	0.10	35.00
03/12/24	DNR	CORRESPONDENCE WITH SEC COUNSEL REGARDING UPDATE CALL.	B110	0.20	70.00
03/12/24	DNR	CORRESPONDENCE WITH INVESTORS REGARDING RECEIVER'S RESPONSES TO DISPUTED CLAIM SUBMISSIONS.	B110	1.50	525.00
03/12/24	DNR	CORRESPONDENCE WITH AHUJA & CONSULTANTS AND STRETTO REGARDING RECEIVER'S RESPONSES TO INVESTORS REGARDING DISPUTED CLAIM SUBMISSIONS.	B310	0.30	105.00
03/12/24	DNR	CORRESPONDENCE WITH STRETTO REGARDING MATRIX UPDATES.	B110	0.40	140.00
03/12/24	DNR	DRAFT RECEIVER'S RESPONSES TO INVESTORS' DISPUTED CLAIM SUBMISSIONS.	B310	6.00	2,100.00



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DATE	ID	DESCRIPTION	TASK	HOURS	AMOUNT
03/12/24	DNR	TELEPHONE CONFERENCE WITH INVESTOR REGARDING CLAIMS PROCEDURE QUESTIONS.	B110	0.10	35.00
03/12/24	DNR	CORRESPONDENCE WITH AHUJA & CONSULTANTS REGARDING BAHAMAS TRACING.	B120	0.20	70.00
03/12/24	DNR	REVIEW UPDATED CREDITOR MATRIX FROM STRETTO.	B110	0.10	35.00
03/12/24	DNR	RECEIVE AND PROCESS RECEIVER'S MAIL.	B210	0.50	175.00
03/12/24	DNR	CORRESPONDENCE TO COMPLIANCE TEAM REGARDING RAILROAD COMMISSION MAIL RECEIVED.	B210	0.10	35.00
03/13/24	DNR	DRAFT RECEIVER'S RESPONSES TO INVESTORS DISPUTED CLAIM SUBMISSIONS.	B310	2.40	840.00
03/13/24	DNR	CORRESPONDENCE WITH AHUJA & CONSULTANTS AND STRETTO REGARDING RESPONSES TO CLAIM SUBMISSIONS AND SPECIFIC CLAIM AMOUNT UPDATES.	B310	0.40	140.00
03/13/24	DNR	RECEIVE DOCUMENT PRODUCTION FROM SEC.	B120	0.10	35.00
03/13/24	DNR	SEND DOCUMENT PRODUCTION TO AHUJA & CONSULTANTS.	B120	0.10	35.00
03/13/24	DNR	CORRESPONDENCE WITH INVESTORS AND/OR COUNSEL REGARDING DISPUTED CLAIM SUBMISSIONS AND RECEIVER RESPONSES.	B110	1.00	350.00
03/13/24	DNR	DISCUSS TIEP CLAIM SUBMISSION WITH DEBORAH D. WILLIAMSON AND PATRICK L. HUFFSTICKLER.	B310	0.20	70.00
03/13/24	DNR	CALL WITH DEBORAH D. WILLIAMSON AND SEC COUNSEL REGARDING SETTLEMENT AND CASE UPDATE.	B110	0.80	280.00
03/13/24	DNR	CORRESPONDENCE WITH REID COLLINS REGARDING SETTLEMENT STATUS.	BT160	0.20	70.00
03/13/24	DNR	CORRESPONDENCE FROM AHUJA & CONSULTANTS REGARDING REVISED BAHAMAS TRACING.	B120	0.10	35.00
03/13/24	DNR	REVIEW UPDATED BAHAMAS TRACING.	B120	0.30	105.00
03/13/24	DNR	CALL WITH AHUJA & CONSULTANTS REGARDING BAHAMAS TRACING.	B120	0.80	280.00
03/13/24	DNR	CORRESPONDENCE WITH INVESTORS REGARDING ELECTION FORMS.	B110	0.20	70.00
03/13/24	DNR	CORRESPONDENCE FROM AHUJA & CONSULTANTS REGARDING IRS RESPONSE.	B240	0.10	35.00
03/13/24	PLH	OFFICE CONFERENCE WITH MS. BEHREND'S AND MS. WILLIAMSON ON TIEP INVESTOR SETTLEMENT AND CLAIM ISSUES.	B120	0.20	108.90



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03/14/24	DNR	REVIEW AND RESPOND TO INVESTOR INQUIRIES.	B110	0.40	140.00
03/14/24	DNR	DISCUSS WITH DEBORAH D. WILLIAMSON AND PROCESS VENDOR PAYMENTS.	B210	0.20	70.00
03/14/24	DNR	CORRESPONDENCE WITH AHUJA & CONSULTANTS REGARDING IRS RESPONSE.	B240	0.40	140.00
03/14/24	DNR	CALL WITH AHUJA & CONSULTANTS REGARDING PRE-RECEIVERSHIP TAX RETURNS.	B240	0.10	35.00
03/14/24	DNR	TELEPHONE CONFERENCE WITH INVESTOR REGARDING CLAIMS PROCEDURE TIMELINE AND FARMOUT STATUS.	B110	0.20	70.00
03/14/24	DNR	CORRESPONDENCE WITH OFFICE OF ATTORNEY GENERAL REGARDING REVISIONS TO RAILROAD COMMISSION CLAIM STIPULATION.	B310	0.10	35.00
03/14/24	DNR	DISCUSS WITH DEBORAH D. WILLIAMSON REVISIONS TO RAILROAD COMMISSION CLAIM STIPULATION AND PROPOSED ORDER.	B310	0.10	35.00
03/14/24	DNR	DISCUSS WITH DEBORAH D. WILLIAMSON TAX RETURN ISSUES AND RESPONSE TO IRS.	B240	0.20	70.00
03/14/24	DNR	CORRESPONDENCE WITH AHUJA & CONSULTANTS AND DEBORAH D. WILLIAMSON REGARDING TAX RETURNS AND OUTSTANDING RESPONSE ITEMS FOR IRS.	B240	0.40	140.00
03/14/24	DNR	CORRESPONDENCE FROM STRETTO REGARDING UPDATED CLAIMS REPORT.	B310	0.10	35.00
03/14/24	DNR	CORRESPONDENCE WITH INVESTORS AND/OR COUNSEL REGARDING RECEIVER'S RESPONSES TO DISPUTED CLAIM SUBMISSIONS.	B110	0.80	280.00
03/14/24	DNR	CORRESPONDENCE WITH STRETTO AND AHUJA & CONSULTANTS REGARDING RESPONSES TO CLAIM SUBMISSIONS AND SPECIFIC CLAIM AMOUNT UPDATES.	B310	0.30	105.00
03/14/24	DNR	CORRESPONDENCE TO OAG REGARDING RAILROAD COMMISSION MAIL RECEIVED FOR NON-RECEIVERSHIP PARTY.	B210	0.10	35.00
03/14/24	DNR	RECEIVE AND PROCESS RECEIVER'S MAIL.	B210	0.30	105.00
03/14/24	DNR	RECEIVE TIEP SETTLEMENT UPDATE FROM PATRICK L. HUFFSTICKLER.	B120	0.10	35.00
03/14/24	DNR	REVIEW RAILROAD COMMISSION'S COMMENTS TO CLAIM STIPULATION; FURTHER REVISE DRAFT OF SAME AND CORRESPONDING PROPOSED ORDER.	B310	0.50	175.00
03/14/24	DNR	DRAFT RECEIVER'S RESPONSES TO INVESTORS DISPUTED CLAIM	B310	2.50	875.00





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DATE	ID	DESCRIPTION	TASK	HOURS	AMOUNT
		SUBMISSIONS.			
03/14/24	DNR	CORRESPONDENCE WITH OIL AND GAS COUNSEL REGARDING FARMOUT.	B210	0.30	105.00
03/14/24	DNR	CORRESPONDENCE TO COMPLIANCE TEAM REGARDING RAILROAD COMMISSION MAIL RECEIVED.	B210	0.10	35.00
03/14/24	PLH	EMAILS WITH TIEP INVESTOR COUNSEL ON SETTLEMENT AND EMAIL MS. WILLIAMSON AND MS. BEHREND ON SAME.	B120	0.30	163.35
03/15/24	DNR	CORRESPONDENCE TO RETAINED PROFESSIONALS REGARDING 1Q2024 QUARTERLY REPORT.	BT155	0.10	35.00
03/15/24	DNR	CORRESPONDENCE WITH INVESTORS REGARDING DISPUTED CLAIM ELECTION FORMS.	B110	0.20	70.00
03/15/24	DNR	CORRESPONDENCE WITH AHUJA & CONSULTANTS AND STRETTO REGARDING RECEIVER'S RESPONSES TO INVESTORS' DISPUTED CLAIMS AND ELECTION FORMS.	B310	0.20	70.00
03/15/24	DNR	CORRESPONDENCE FROM AHUJA & CONSULTANTS REGARDING UPDATED BAHAMAS TRACING.	B120	0.10	35.00
03/15/24	DNR	REVISE, FINALIZE, AND FILE RAILROAD CLAIM STIPULATION AND PROPOSED ORDER; SUBMIT PROPOSED ORDER REGARDING SAME AND COPY OFFICE OF ATTORNEY GENERAL.	B310	0.40	140.00
03/15/24	DNR	PREPARE AND SEND LETTER IN RESPONSE TO IRS CORRESPONDENCE TO VENTURES.	B240	0.60	210.00
03/15/24	DNR	UPDATE SEC COUNSEL REGARDING RAILROAD CLAIM.	B110	0.10	35.00
03/15/24	DNR	REVIEW LENGTHY CORRESPONDENCE AND MATERIALS FROM AHUJA & CONSULTANTS TO RESPOND TO IRS; CORRESPONDENCE WITH AHUJA & CONSULTANTS ON SAME.	B240	0.40	140.00
03/15/24	DNR	RECEIVE AND REVIEW IBC ACCOUNT ANALYSIS; SEND TO AHUJA & CONSULTANTS.	B210	0.30	105.00
03/15/24	DNR	CORRESPONDENCE WITH PATRICK L. HUFFSTICKLER REGARDING TIEP SETTLEMENT OFFERS.	B120	0.40	140.00
03/15/24	DNR	CORRESPONDENCE WITH OFFICE OF THE ATTORNEY GENERAL REGARDING COMMENTS TO RAILROAD COMMISSION CLAIM STIPULATION AND APPROVAL TO FILE FINAL OF SAME.	B310	0.40	140.00
03/15/24	DNR	CORRESPONDENCE TO AHUJA & CONSULTANTS REGARDING TIEP SETTLEMENT UPDATE.	B310	0.10	35.00
03/15/24	DNR	CORRESPONDENCE WITH DEBORAH D. WILLIAMSON REGARDING IRS LETTER RESPONSE.	B240	0.20	70.00
03/15/24	DNR	CORRESPONDENCE TO COMPLIANCE TEAM AND AHUJA &	B310	0.10	35.00



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		CONSULTANTS REGARDING RAILROAD COMMISSION CLAIM STIPULATION.			
03/15/24	DNR	DRAFT RECEIVER'S RESPONSES TO INVESTORS DISPUTED CLAIM SUBMISSIONS.	B310	0.80	280.00
03/15/24	DNR	CORRESPONDENCE TO STRETTO AND AHUJA & CONSULTANTS REGARDING RECEIVER'S RESPONSES TO DISPUTED CLAIM SUBMISSIONS.	B310	0.20	70.00
03/15/24	DNR	UPDATE WEBSITE CONTENT FOR CLAIMS PAGE.	B110	0.30	105.00
03/15/24	DNR	RECEIVE AND REVIEW WAB FEBRUARY STATEMENT; SEND TO AHUJA & CONSULTANTS.	B210	0.30	105.00
03/15/24	PLH	EMAIL WITH TIEP COUNSEL ON SETTLEMENT ISSUES AND EMAIL MS. WILLIAMSON AND MS. BEHREND ON SAME.	B120	0.30	163.35
03/18/24	DNR	CORRESPONDENCE WITH INVESTORS REGARDING DISPUTED CLAIM ELECTION FORMS.	B110	0.20	70.00
03/18/24	DNR	REVIEW AND RESPOND TO INVESTOR INQUIRIES.	B110	0.40	140.00
03/18/24	DNR	CORRESPONDENCE WITH INVESTORS REGARDING RECEIVER'S RESPONSES TO CLAIM SUBMISSIONS.	B110	0.40	140.00
03/18/24	DNR	CORRESPONDENCE WITH COMPLIANCE TEAM REGARDING ABANDONED WELL.	B210	0.30	105.00
03/18/24	DNR	CALL WITH OIL AND GAS COUNSEL REGARDING FARMOUT.	B210	0.20	70.00
03/18/24	DNR	CORRESPONDENCE WITH AHUJA & CONSULTANTS REGARDING 3Q2021 AND 4Q2021 TAX FORMS FOR VENTURES.	B240	0.60	210.00
03/18/24	DNR	DISCUSS WITH DEBORAH D. WILLIAMSON DRAFT AND REVISED TAX FORMS FOR VENTURES.	B240	0.30	105.00
03/18/24	DNR	DRAFT LETTER TO IRS RESPONDING TO VENTURES CORRESPONDENCE.	B240	0.40	140.00
03/18/24	DNR	DRAFT RECEIVER'S RESPONSES TO DISPUTED CLAIM SUBMISSIONS.	B310	4.70	1,645.00
03/18/24	DNR	CORRESPONDENCE WITH AHUJA & CONSULTANTS AND STRETTO REGARDING RESPONSES OF RECEIVER TO CLAIM SUBMISSIONS AND ELECTION FORMS RECEIVED.	B310	0.80	280.00
03/18/24	DNR	RECEIVE AND PROCESS RECEIVER'S MAIL.	B210	0.30	105.00
03/18/24	DNR	DRAFT DISPUTED CLAIM WITHDRAWAL FORM.	B310	0.30	105.00
03/18/24	DNR	REVIEW DRAFT AND REVISED TAX FORMS FOR VENTURES FROM AHUJA & CONSULTANTS.	B240	0.50	175.00
03/18/24	DNR	CORRESPONDENCE WITH AHUJA & CONSULTANTS REGARDING	B240	0.20	70.00



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		TAX CALL.			
03/18/24	DNR	CORRESPONDENCE WITH RETAINED PROFESSIONALS REGARDING MARCH 19, 2024 HEARING.	B110	0.20	70.00
03/18/24	DNR	CORRESPONDENCE WITH OIL AND GAS COUNSEL REGARDING ESCHEATMENT PROCESS.	B210	0.20	70.00
03/18/24	DNR	CORRESPONDENCE FROM SEC COUNSEL REGARDING RAILROAD COMMISSION CLAIM STIPULATION.	B110	0.10	35.00
03/19/24	DNR	CORRESPONDENCE WITH INVESTORS REGARDING DISPUTED CLAIM ELECTION FORMS.	B110	0.40	140.00
03/19/24	DNR	RECEIVE AND REVIEW ELECTION FORMS SUBMITTED.	B310	0.20	70.00
03/19/24	DNR	REVIEW AND RESPOND TO INVESTOR INQUIRIES.	B110	0.40	140.00
03/19/24	DNR	RECEIVE EXECUTED VENDOR AGREEMENT FOR ESCHEATMENT.	B210	0.10	35.00
03/19/24	DNR	CORRESPONDENCE WITH AHUJA & CONSULTANTS REGARDING TAX CALL.	B240	0.20	70.00
03/19/24	DNR	RECEIVE SETTLEMENT DOCUMENTS FROM TIEP INVESTORS; SEND TO AHUJA & CONSULTANTS FOR TAX PURPOSES.	B120	0.20	70.00
03/19/24	DNR	CORRESPONDENCE WITH STRETTO REGARDING AMENDED TRANSACTION SCHEDULES.	B310	0.20	70.00
03/19/24	DNR	CORRESPONDENCE WITH STRETTO AND AHUJA & CONSULTANTS REGARDING WITHDRAWAL AND ELECTION FORMS AND RECEIVER'S RESPONSES.	B310	0.60	210.00
03/19/24	DNR	CORRESPONDENCE WITH AHUJA & CONSULTANTS REGARDING BAHAMAS TRACING AND DECLARATION FOR SAME.	B120	0.50	175.00
03/19/24	DNR	DISCUSS WITH DEBORAH D. WILLIAMSON BAHAMAS TRACING AND MOTION ON SAME.	B120	0.20	70.00
03/19/24	DNR	CORRESPONDENCE WITH AHUJA & CONSULTANTS REGARDING TAX PAYMENT TO IRS.	B240	0.40	140.00
03/19/24	DNR	DRAFT RECEIVER'S RESPONSES TO DISPUTED CLAIM SUBMISSIONS.	B310	0.40	140.00
03/19/24	DNR	CORRESPONDENCE WITH INVESTORS REGARDING RECEIVER'S RESPONSES TO CLAIM SUBMISSIONS.	B110	0.20	70.00
03/19/24	DNR	TELEPHONE CONFERENCE WITH INVESTOR REGARDING CLAIMS PROCEDURE TIMELINE.	B110	0.10	35.00
03/19/24	DNR	CALL WITH DEBORAH D. WILLIAMSON AND AHUJA & CONSULTANTS REGARDING TAX AND ACCOUNTING ITEMS OUTSTANDING.	B240	1.00	350.00



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DATE	ID	DESCRIPTION	TASK	HOURS	AMOUNT
03/19/24	DNR	RECEIVE AND PROCESS RECEIVER'S MAIL.	B210	0.30	105.00
03/19/24	DNR	SEND RAILROAD COMMISSION MAIL TO COMPLIANCE TEAM.	B210	0.10	35.00
03/19/24	DNR	APPEAR BEFORE THE HON. HAL R. RAY JR. AT MARCH 19, 2024 HEARING.	B110	0.50	175.00
03/19/24	DNR	RECEIVE AND REVIEW WITHDRAWAL FORM FROM CLAIMANT.	B310	0.20	70.00
03/19/24	DNR	DRAFT THREE PACKAGES TO IRS IN RESPONSE TO LETTER RECEIVED BY VENTURES.	B240	0.70	245.00
03/19/24	DNR	DISCUSS WITH DEBORAH D. WILLIAMSON REVISED RESPONSES TO IRS AND RETURN FORMS FOR PROCESSING.	B240	0.30	105.00
03/19/24	DNR	CORRESPONDENCE WITH CLAIMANT REGARDING WITHDRAWAL FORM AND CLAIM STATUS.	B310	0.40	140.00
03/19/24	DNR	PROCESS VENDOR PAYMENTS WITH DEBORAH D. WILLIAMSON.	B210	0.20	70.00
03/19/24	DNR	PREPARE FOR MARCH 19, 2024 HEARING.	B110	0.40	140.00
03/19/24	DNR	DISCUSS WITH DEBORAH D. WILLIAMSON CLAIM OBJECTIONS AND ISSUES ON SAME.	B310	0.20	70.00
03/19/24	PLH	ADDRESS ISSUES ON TIEP INVESTOR SETTLEMENTS, WITH MS. WILLIAMSON AND MS. BEHREND AND EMAIL TIEP INVESTOR COUNSEL ON SAME.	B120	0.80	435.60
03/20/24	DNR	REVIEW ORDER ENTERED BY THE COURT ON MARCH 20, 2024.	B110	0.10	35.00
03/20/24	DNR	CORRESPONDENCE TO OFFICE OF ATTORNEY GENERAL REGARDING RAILROAD COMMISSION CLAIM STIPULATION DISCUSSION AT MARCH 20, 2024 HEARING.	B310	0.10	35.00
03/20/24	DNR	FINALIZE AND ISSUE PACKAGES TO IRS ON BEHALF OF VENTURES.	B240	0.40	140.00
03/20/24	DNR	CORRESPONDENCE TO AHUJA & CONSULTANTS REGARDING RESPONSE LETTERS TO IRS.	B240	0.10	35.00
03/20/24	DNR	TELEPHONE CONFERENCE WITH FINANCIAL ADVISOR REGARDING INABILITY TO SPEAK ON BEHALF OF CLIENTS WITH RECEIVERSHIP TEAM.	B110	0.10	35.00
03/20/24	DNR	CORRESPONDENCE WITH AHUJA & CONSULTANTS REGARDING ADDITIONAL TRANSACTION SCHEDULES AND TRACING FOR POTENTIAL INVESTORS; REVIEW SPREADSHEET ON SAME.	B310	0.50	175.00
03/20/24	DNR	CORRESPONDENCE WITH AHUJA & CONSULTANTS REGARDING BAHAMAS TRACING.	B120	0.20	70.00
03/20/24	DNR	CORRESPONDENCE WITH REID COLLINS REGARDING	BT160	0.20	70.00



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DATE	ID	DESCRIPTION	TASK	HOURS	AMOUNT
		SETTLEMENT STATUS.			
03/20/24	DNR	TELEPHONE CONFERENCE WITH INVESTOR COUNSEL REGARDING TRANSACTION SCHEDULE.	B110	0.30	105.00
03/20/24	DNR	CORRESPONDENCE WITH STRETTO REGARDING NEW TRANSACTION SCHEDULES.	B310	0.40	140.00
03/20/24	DNR	DRAFT RECEIVER'S RESPONSES TO DISPUTED CLAIM SUBMISSIONS.	B310	1.00	350.00
03/20/24	DNR	CORRESPONDENCE WITH INVESTORS AND COUNSEL REGARDING RECEIVER'S RESPONSES TO DISPUTED CLAIM SUBMISSIONS.	B110	0.20	70.00
03/20/24	DNR	TELEPHONE CONFERENCE WITH CAD COUNSEL REGARDING PRE-RECEIVERSHIP TAXES OWED PRIOR TO ACQUISITION BY BARRON PETROLEUM.	B240	0.40	140.00
03/20/24	DNR	REVIEW ORDER SETTING HEARING ON RAILROAD CONSULTANTS CLAIM STIPULATION.	B310	0.10	35.00
03/20/24	DNR	CORRESPONDENCE WITH OFFICE OF ATTORNEY GENERAL REGARDING HEARING SET BY COURT ORDER RAILROAD COMMISSION CLAIM STIPULATION.	B310	0.20	70.00
03/20/24	DNR	UPDATE CONTENT ON CASE WEBSITE.	B110	0.30	105.00
03/20/24	DNR	DISCUSS WITH DEBORAH D. WILLIAMSON CALL FROM CAD COUNSEL REGARDING OUTSTANDING TAXES OWED PRIOR TO BARRON PETROLEUM'S OWNERSHIP.	B240	0.10	35.00
03/20/24	PLH	EMAIL ON TIEP INVESTOR COUNSEL ON SETTLEMENT ISSUES.	B120	0.10	54.45
03/20/24	PLH	OFFICE CONFERENCE WITH MS. BEHREND ON TIEP INVESTOR CLAIM MATTERS AND STRATEGY TO ADDRESS.	B120	0.20	108.90
03/21/24	DNR	RECEIVE EMAILS FROM GENERAL LAND OFFICE REGARDING MISSING REPORTS POST-ABANDONMENT.	B210	0.20	70.00
03/21/24	DNR	RECEIVE AND REVIEW DISPUTED CLAIM ELECTION FORMS FROM INVESTORS.	B310	0.40	140.00
03/21/24	DNR	REVIEW AND RESPOND TO INVESTOR INQUIRIES.	B110	0.40	140.00
03/21/24	DNR	PREPARE AND FILE NOTICE OF HEARING AND SERVICE OF COURT ORDER REGARDING RAILROAD COMMISSION CLAIM STIPULATION.	B110	0.40	140.00
03/21/24	DNR	CORRESPONDENCE WITH STRETTO AND AHUJA & CONSULTANTS REGARDING DISPUTED CLAIM ELECTION FORMS AND RECEIVER'S RESPONSES TO CLAIM SUBMISSIONS.	B310	0.20	70.00
03/21/24	DNR	TELEPHONE CONFERENCE WITH INVESTOR REGARDING	B110	0.20	70.00



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DATE	ID	DESCRIPTION	TASK	HOURS	AMOUNT
		DISPUTED CLAIM ELECTION FORM.			
03/21/24	DNR	CORRESPONDENCE TO OFFICE OF ATTORNEY GENERAL REGARDING HEARING NOTICE ON RAILROAD COMMISSION CLAIM OBJECTION.	B310	0.10	35.00
03/21/24	DNR	TELEPHONE CONFERENCE WITH INVESTOR REGARDING RAILROAD COMMISSION CLAIM STIPULATION AND IMPACT ON POTENTIAL DISTRIBUTION.	B110	0.20	70.00
03/21/24	DNR	UPDATE WEBSITE CONTENT ON CLAIMS PAGE.	B110	0.30	105.00
03/21/24	DNR	TELEPHONE CONFERENCE WITH INVESTOR REGARDING INVESTMENT FUNDS MISSING FROM TRANSACTION SCHEDULE TURNED OVER TO FINANCIAL ADVISOR.	B110	0.30	105.00
03/21/24	DNR	CORRESPONDENCE WITH DEBORAH D. WILLIAMSON AND AHUJA & CONSULTANTS REGARDING TAX RETURN PREPARATION CALL AND CLOSING LETTER ITEMS.	B240	0.30	105.00
03/22/24	DNR	CORRESPONDENCE FROM INVESTOR COUNSEL REGARDING REQUEST FOR FARMEE CONTACT.	B110	0.10	35.00
03/22/24	DNR	CORRESPONDENCE WITH DEBORAH D. WILLIAMSON AND OIL AND GAS COUNSEL REGARDING FARMEE REQUEST OF INVESTORS AND RELATED FARMOUT AGREEMENT ISSUES.	B210	0.60	210.00
03/22/24	DNR	REVIEW AND RESPOND TO INVESTOR INQUIRIES.	B110	0.60	210.00
03/22/24	DNR	UPDATE DEBORAH D. WILLIAMSON REGARDING INVESTOR INQUIRIES.	B110	0.10	35.00
03/22/24	DNR	CORRESPONDENCE TO SEC COUNSEL REGARDING NON-INVESTOR PROOF OF CLAIM SUBMISSION.	B110	0.10	35.00
03/22/24	DNR	CORRESPONDENCE WITH AHUJA & CONSULTANTS REGARDING RESEARCH NEEDED ON NON-INVESTOR CLAIM SUBMISSION RE HEARTLAND; REVIEW RESULTS ON SAME.	B310	0.40	140.00
03/22/24	DNR	REVIEW NON-INVESTOR CLAIM SUBMISSIONS AND CLAIM FILES.	B310	2.50	875.00
03/22/24	DNR	CORRESPONDENCE WITH OIL AND GAS COUNSEL REGARDING FARMOUT AGREEMENT AMOUNTS OWED.	B210	0.20	70.00
03/22/24	DNR	RECEIVE AND REVIEW GULF COAST STATEMENT FOR FEBRUARY 2024; SEND TO COMPLIANCE TEAM.	B210	0.30	105.00
03/22/24	DNR	CORRESPONDENCE TO FARMEE COUNSEL REGARDING GULF COAST STATEMENT AND PAYMENT DUE.	B210	0.10	35.00
03/22/24	DNR	CORRESPONDENCE WITH FARMEE COUNSEL REGARDING PROOF OF CLAIM RESPONSE AND CONTACT INSTRUCTIONS.	B310	0.20	70.00



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DATE	ID	DESCRIPTION	TASK	HOURS	AMOUNT
03/22/24	DNR	DRAFT RECEIVER'S RESPONSES TO DISPUTED CLAIM SUBMISSIONS.	B310	2.00	700.00
03/22/24	DNR	TELEPHONE CONFERENCE WITH INVESTOR REGARDING TRANSACTION SCHEDULE AND RECEIVER'S RESPONSE TO CLAIM.	B110	0.40	140.00
03/22/24	DNR	UPDATE SEC COUNSEL REGARDING POTENTIAL INVESTOR CORRESPONDENCE.	B110	0.10	35.00
03/22/24	PLH	REVIEW EMAILS ON TIEP SETTLEMENT CHECKS.	B120	0.20	108.90
03/25/24	DNR	DRAFT RECEIVER'S RESPONSES TO DISPUTED CLAIM SUBMISSIONS AND LETTERS REGARDING PROPOSED CLAIM AMOUNTS.	B310	1.80	630.00
03/25/24	DNR	CORRESPONDENCE TO INVESTORS, CLAIMANTS, AND/OR COUNSEL REGARDING RECEIVER'S RESPONSES TO DISPUTED CLAIM SUBMISSIONS OR NEW TRANSACTION SCHEDULES.	B310	0.80	280.00
03/25/24	DNR	CORRESPONDENCE WITH AHUJA & CONSULTANTS REGARDING INVESTOR CLAIM SUBMISSIONS AND FOLLOW UP RESEARCH.	B310	0.30	105.00
03/25/24	DNR	CORRESPONDENCE WITH DEBORAH D. WILLIAMSON AN REID COLLINS REGARDING FURTHER REVISED SETTLEMENT AGREEMENT AND MOTION FROM OPPOSING COUNSEL.	BT160	0.50	175.00
03/25/24	DNR	REVIEW AND PROVIDE FURTHER COMMENTS AND EDITS TO SETTLEMENT AGREEMENT AND CORRESPONDING MOTION.	BT160	0.50	175.00
03/25/24	DNR	REVIEW AND RESPOND TO INVESTOR INQUIRIES.	B110	0.80	280.00
03/25/24	DNR	CORRESPONDENCE WITH AHUJA & CONSULTANTS REGARDING TAX RETURN CALL.	B240	0.20	70.00
03/25/24	DNR	CORRESPONDENCE WITH OIL AND GAS COUNSEL AND CONTRACT OPERATOR REGARDING POST-EFFECTIVE DATE EXPENSES UNDER FARMOUT.	B210	0.40	140.00
03/25/24	DNR	RECEIVE AND PROCESS RECEIVER'S MAIL.	B210	0.40	140.00
03/25/24	DNR	CORRESPONDENCE TO COMPLIANCE TEAM REGARDING RAILROAD COMMISSION MAIL RECEIVED.	B210	0.10	35.00
03/25/24	DNR	RECEIVE AND PROCESS ELECTION FORMS RECEIVED BY INVESTORS.	B310	0.40	140.00
03/25/24	DNR	CORRESPONDENCE TO AHUJA & CONSULTANTS AND STRETTO REGARDING DISPUTED CLAIM ELECTION FORMS.	B310	0.10	35.00
03/25/24	DNR	CORRESPONDENCE TO AHUJA & CONSULTANTS REGARDING IRS MAIL RECEIVED.	B240	0.10	35.00
03/25/24	DNR	ANALYZE NON-INVESTOR CLAIMS AND SUPPORTING	B310	3.00	1,050.00



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DATE	ID	DESCRIPTION	TASK	HOURS	AMOUNT
		DOCUMENTATION AND DRAFT RECEIVER'S RESPONSES TO SAME.			
03/25/24	DNR	CALL WITH AHUJA & CONSULTANTS AND DEBORAH D. WILLIAMSON REGARDING TAX RETURN PREPARATION FOR 2023 TAX YEAR AND REVIEW OF WORKING PAPER FOR SAME.	B240	1.70	595.00
03/25/24	DNR	CORRESPONDENCE TO SEC COUNSEL REGARDING POTENTIAL INVESTOR CLAIMS AND DISPUTED CLAIM SUBMISSIONS.	B110	0.20	70.00
03/25/24	DNR	TELEPHONE CONFERENCE WITH VENDOR REGARDING NON-INVESTOR CLAIM SUBMISSION.	B110	0.20	70.00
03/25/24	DNR	TELEPHONE CONFERENCE WITH INVESTOR REGARDING MISSING INVESTMENT FUNDS.	B110	0.20	70.00
03/25/24	DNR	DISCUSS WITH DEBORAH D. WILLIAMSON NON-INVESTOR CLAIM SUBMISSIONS.	B310	0.30	105.00
03/26/24	DNR	CORRESPONDENCE TO INVESTORS, CLAIMANTS, AND/OR COUNSEL REGARDING RECEIVER'S RESPONSES TO DISPUTED CLAIM SUBMISSIONS OR NEW TRANSACTION SCHEDULES.	B110	0.80	280.00
03/26/24	DNR	REVIEW AND RESPOND TO INVESTOR INQUIRIES.	B110	0.20	70.00
03/26/24	DNR	CORRESPONDENCE WITH CONTRACT OPERATOR REGARDING SHURLEY RANCH SHUT IN BY GAS GATHERER.	B210	0.20	70.00
03/26/24	DNR	DRAFT DISPUTED CLAIM ELECTION FORM FOR NON-INVESTOR CLAIMANTS.	B310	0.20	70.00
03/26/24	DNR	CORRESPONDENCE WITH COURTROOM DEPUTY REGARDING APRIL 15, 2024 HEARING CREDENTIALS.	B110	0.20	70.00
03/26/24	DNR	CORRESPONDENCE TO OFFICE OF THE ATTORNEY GENERAL REGARDING HEARING CREDENTIALS FOR APRIL 15TH HEARING ON RAILROAD COMMISSION CLAIM STIPULATION.	B110	0.10	35.00
03/26/24	DNR	CORRESPONDENCE WITH STRETTO REGARDING RECEIVER RESPONSES TO CLAIM SUBMISSIONS FOR NON-INVESTORS AND INVESTORS.	B310	0.20	70.00
03/26/24	DNR	ANALYZE NON-INVESTOR CLAIMS AND SUPPORTING DOCUMENTATION AND DRAFT RECEIVER'S RESPONSES TO SAME.	B310	4.50	1,575.00
03/26/24	DNR	CORRESPONDENCE WITH SEC COUNSEL REGARDING POTENTIAL INVESTOR CLAIMS.	B110	0.20	70.00
03/26/24	DNR	CORRESPONDENCE TO AHUJA & CONSULTANTS REGARDING SEC POTENTIAL INVESTOR CLAIMS SUBMISSIONS RESPONSES.	B310	0.10	35.00
03/26/24	DNR	CALL WITH REID COLLINS AND DEBORAH D. WILLIAMSON REGARDING REVISED SETTLEMENT AGREEMENT AND MOTION	BT160	0.40	140.00





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DATE	ID	DESCRIPTION	TASK	HOURS	AMOUNT
		ON SAME.			
03/26/24	DNR	CORRESPONDENCE WITH REID COLLINS REGARDING SERVICE FOR SETTLEMENT MOTION; BRIEF CALL ON SAME.	BT160	0.20	70.00
03/26/24	DNR	DISCUSS WITH DEBORAH D. WILLIAMSON NON-INVESTOR CLAIM SUBMISSIONS AND RESPONSES TO SAME.	B310	0.70	245.00
03/26/24	DNR	TELEPHONE CONFERENCE WITH INVESTOR REGARDING CLAIM PROCEDURE QUESTIONS.	B110	0.10	35.00
03/26/24	DNR	CORRESPONDENCE TO STRETTO REGARDING ADDITIONAL SERVICE OF TRANSACTION SCHEDULE ON INVESTOR.	B310	0.10	35.00
03/26/24	DNR	TELEPHONE CONFERENCE WITH INVESTOR REGARDING CLAIMS PACKET NOT RECEIVED AND CLAIMS PROCEDURE QUESTIONS.	B110	0.20	70.00
03/26/24	DNR	TELEPHONE CONFERENCE WITH INVESTOR REGARDING 2023 K-1 TAX DOCUMENTATION.	B110	0.10	35.00
03/26/24	DNR	TELEPHONE CONFERENCE WITH POTENTIAL FORMER EMPLOYEE'S WIDOW REGARDING CLAIMS MOTION AND CASE BACKGROUND.	B110	0.10	35.00
03/26/24	DNR	CORRESPONDENCE TO STRETTO REGARDING UPDATE INVESTOR CONTACT INFORMATION.	B110	0.10	35.00
03/26/24	DNR	TELEPHONE CONFERENCE WITH INVESTOR'S RELATIVE REGARDING DEATH AND DOCUMENTATION ON SAME.	B110	0.20	70.00
03/26/24	DNR	CORRESPONDENCE WITH AHUJA & CONSULTANTS REGARDING DISPUTED CLAIMS CALL.	B310	0.20	70.00
03/26/24	DNR	CORRESPONDENCE WITH INVESTOR'S AGENT REGARDING DEATH CERTIFICATE AND DOCUMENTATION.	B110	0.20	70.00
03/27/24	DNR	REVIEW AND RESPOND TO INVESTOR AND VENDOR INQUIRIES.	B110	0.60	210.00
03/27/24	DNR	CORRESPONDENCE WITH STRETTO REGARDING SERVICE OF CLAIMS PACKETS AND RECEIVER'S RESPONSES TO CLAIM SUBMISSIONS.	B310	0.20	70.00
03/27/24	DNR	ANALYZE NON-INVESTOR CLAIMS AND SUPPORTING DOCUMENTATION AND DRAFT RECEIVER'S RESPONSES TO SAME.	B310	4.00	1,400.00
03/27/24	DNR	RECEIVE AND PROCESS RECEIVER'S MAIL.	B210	0.60	210.00
03/27/24	DNR	CORRESPONDENCE WITH STRETTO REGARDING DISPUTED CLAIM ELECTION FORMS AND RECEIVER'S RESPONSES TO CLAIM SUBMISSIONS.	B310	0.40	140.00
03/27/24	DNR	CORRESPONDENCE TO CONTRACT OPERATOR REGARDING	B210	0.10	35.00



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DATE	ID	DESCRIPTION	TASK	HOURS	AMOUNT
		HARDEMAN COUNTY LEASE NOTICE FROM RAILROAD COMMISSION.			
03/27/24	DNR	CORRESPONDENCE WITH OFFICE OF ATTORNEY GENERAL REGARDING RAILROAD COMMISSION FINAL ORDERS RECEIVED, DATED MARCH 19, 2024.	B210	0.20	70.00
03/27/24	DNR	CORRESPONDENCE WITH AHUJA & CONSULTANTS AND DEBORAH D. WILLIAMSON REGARDING DISTRIBUTION AND BAHAMAS DECLARATIONS.	B130	0.50	175.00
03/27/24	DNR	TELEPHONE CONFERENCE WITH INVESTOR REGARDING TRANSACTION SCHEDULE AND INVESTMENT QUESTIONS.	B110	0.20	70.00
03/27/24	DNR	CORRESPONDENCE TO STRETTO REGARDING UPDATING INVESTOR CONTACT INFORMATION.	B110	0.10	35.00
03/27/24	DNR	TELEPHONE CONFERENCE WITH INVESTOR REGARDING CLAIMS PROCEDURE AND RECEIVER'S RESPONSE TO DISPUTED CLAIM SUBMISSION QUESTIONS.	B110	0.10	35.00
03/27/24	DNR	CORRESPONDENCE WITH REID COLLINS AND DEBORAH D. WILLIAMSON REGARDING FURTHER REVISIONS TO SETTLEMENT AGREEMENT FROM OPPOSING COUNSEL.	BT160	0.40	140.00
03/27/24	DNR	REVIEW FURTHER REVISIONS TO SETTLEMENT AGREEMENT AND PROVIDE COMMENTS.	BT160	0.10	35.00
03/27/24	DNR	DISCUSS WITH DEBORAH D. WILLIAMSON ISSUES REGARDING OPPOSING COUNSEL'S REVISIONS TO SETTLEMENT AGREEMENT.	BT160	0.10	35.00
03/27/24	DNR	DISCUSS WITH DEBORAH D. WILLIAMSON NON-INVESTOR CLAIM SUBMISSIONS AND RESPONSES TO SAME.	B310	0.20	70.00
03/28/24	DNR	CORRESPONDENCE WITH STRETTO REGARDING RECEIVER'S RESPONSES TO CLAIMS SUBMISSIONS AND POTENTIAL INVESTOR CLAIM CATEGORIZATION WITH NEW TRANSACTION SCHEDULES.	B310	0.50	175.00
03/28/24	DNR	CORRESPONDENCE WITH AHUJA & CONSULTANTS REGARDING DISTRIBUTION METHODOLOGY AND DECLARATION.	B130	0.40	140.00
03/28/24	DNR	CORRESPONDENCE WITH NON-INVESTOR CREDITORS REGARDING RECEIVER'S RESPONSES TO CLAIM SUBMISSIONS.	B310	0.60	210.00
03/28/24	DNR	CORRESPONDENCE WITH REID COLLINS AND DEBORAH D. WILLIAMSON REGARDING SETTLEMENT AGREEMENT AND SIGNATURE ITEMS AND OUTSTANDING ISSUES REGARDING MOTION.	BT160	0.60	210.00
03/28/24	DNR	REVIEW AND RESPOND TO INVESTOR INQUIRIES.	B110	0.20	70.00



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03/28/24	DNR	TELEPHONE CONFERENCE TO COURTROOM DEPUTY REGARDING SERVICE AND COURT AVAILABILITY.	B110	0.10	35.00
03/28/24	DNR	CORRESPONDENCE WITH STRETTO REGARDING CREDITOR MATRIX AND SERVICE DETAILS.	B110	0.30	105.00
03/28/24	DNR	RECEIVE NON-INVESTOR ELECTION FORMS.	B310	0.10	35.00
03/28/24	DNR	CORRESPONDENCE WITH AHUJA & CONSULTANTS REGARDING DRAFT 2023 TAX RETURNS; DOWNLOAD SAME.	B240	0.30	105.00
03/28/24	DNR	ANALYZE NON-INVESTOR CLAIMS AND SUPPORTING DOCUMENTATION AND DRAFT RECEIVER'S RESPONSES TO SAME.	B310	2.00	700.00
03/29/24	DNR	CORRESPONDENCE FROM GENERAL LAND OFFICE REGARDING MONTHLY REPORTING.	B210	0.20	70.00
03/29/24	DNR	REVIEW AND RESPOND TO INVESTOR AND VENDOR INQUIRIES.	B110	0.20	70.00
03/29/24	DNR	RECEIVE AND REVIEW DISPUTED CLAIM ELECTION FORMS.	B310	0.10	35.00
03/29/24	DNR	CORRESPONDENCE WITH INVESTORS REGARDING DISPUTED CLAIM ELECTION FORMS.	B110	0.20	70.00
03/29/24	DNR	CORRESPONDENCE TO COURTROOM DEPUTY REGARDING SERVICE QUESTION.	B110	0.10	35.00
03/29/24	DNR	CORRESPONDENCE WITH STRETTO REGARDING NON-INVESTOR CLAIM SUBMISSION ITEMS.	B310	0.10	35.00
03/29/24	DNR	ANALYZE NON-INVESTOR CLAIMS AND SUPPORTING DOCUMENTATION AND DRAFT RECEIVER'S RESPONSES TO SAME.	B310	4.50	1,575.00
03/29/24	DNR	CALL WITH AHUJA & CONSULTANTS REGARDING DISPUTED CLAIMS.	B310	0.50	175.00
03/29/24	DNR	CORRESPONDENCE WITH STRETTO REGARDING UPDATED CLAIMS REGISTER REQUESTS AND RECEIVER'S RESPONSES ITEMS.	B310	0.50	175.00
03/30/24	DNR	CORRESPONDENCE WITH INVESTORS REGARDING ELECTION FORMS.	B110	0.20	70.00
		<b>TOTAL</b>		<b>141.20</b>	<b>\$50,217.45</b>



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**BILLING SUMMARY**

<b>ID</b>	<b>TIMEKEEPER</b>	<b>TITLE</b>	<b>HOURS</b>	<b>RATE</b>	<b>AMOUNT</b>
DNR	DANIELLE R. BEHREND	PARTICIPATING MEMBER	137.10	350.00	47,985.00
PLH	PATRICK HUFFSTICKLER	PARTICIPATING MEMBER	4.10	544.50	2,232.45
	<b>TOTAL</b>		<b>141.20</b>		<b>\$50,217.45</b>



DEBORAH D WILLIAMSON  
DEBORAH WILLIAMSON

MATTER #: 122686.000002  
INVOICE #: 3582553  
PAGE 23

APRIL 24, 2024

**DISBURSEMENTS**

<b>DATE</b>	<b>DESCRIPTION</b>	<b>QUANTITY</b>	<b>RATE</b>	<b>AMOUNT</b>
	PHOTOCOPIES	800.00	0.10	80.00
	PRINTING EXPENSES	1,629.00	0.10	161.90
	SCANNING	589.00	0.10	58.90
	<b>TOTAL DISBURSEMENTS</b>			<b>300.80</b>



DEBORAH D WILLIAMSON  
 DEBORAH WILLIAMSON

MATTER #: 122686.000002  
 INVOICE #: 3582553  
 PAGE 24

APRIL 24, 2024

**TASK SUMMARY**

<b>TASK</b>	<b>TASK DESCRIPTION</b>	<b>HOURS</b>	<b>AMOUNT</b>
B110	CASE ADMINISTRATION	27.70	9,695.00
B120	ASSET ANALYSIS AND RECOVERY	10.80	4,577.45
B130	ASSET DISPOSITION	0.90	315.00
B210	BUSINESS OPERATIONS	13.70	4,795.00
B240	TAX ISSUES	12.40	4,340.00
B310	CLAIMS ADMINISTRATION & OBJECT	68.00	23,800.00
BT155	STATUS REPORTS	0.10	35.00
BT160	LITIGATION CONSULTING	7.60	2,660.00
<b>TOTAL</b>		<b>141.20</b>	<b>50,217.45</b>

**EXPENSE SUMMARY**

PHOTOCOPIES	80.00
SCANNING	58.90
PRINTING EXPENSES	161.90
<b>TOTAL</b>	<b>300.80</b>

**EXHIBIT E-2**

Law Offices of  
Romero | Kozub

235 N.E. Loop 820, Ste 105  
Fort Worth, Texas 76120  
United States  
682-267-1351

Law Offices of  
Romero | Kozub

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

Invoice # 00189  
Invoice Date April 30, 2024

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

Time Entries

Date	EE	Activity	Description	Rate	Hours	Line Total
01/23/2024	RR	Claims Administration	Review and analyze email correspondence regarding claims	\$425.00	0.5	\$212.50
01/30/2024	RR	Status Reports	Review and analyze Receiver's Ninth Quarterly Report for Receivership Estates	\$425.00	0.6	\$255.00
02/14/2024	RR	Case Administration	Telephone call with D. Behrends regarding status of the Receivership and pending issues	\$425.00	0.3	\$127.50
03/19/2024	RR	Case Administration	Attend hearing on March 19, 2024	\$425.00	0.6	\$255.00

Totals: 2.00 \$850.00

Time Entry Sub-Total:	\$850.00
<b>Sub-Total:</b>	<b>\$850.00</b>
<b>Total:</b>	<b>\$850.00</b>
<b>Amount Paid:</b>	<b>\$0.00</b>
<b>Balance Due:</b>	<b>\$850.00</b>



**EXHIBIT E-3**

## Law Practice of Darrell R. Jones, PLLC

drj@oilesquire.com

(832) 302-5373

February 05, 2024

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

**Invoice Number: 936**

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

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

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

<b>Date</b>	<b>Professional</b>	<b>Task</b>	<b>Hours</b>	<b>Rate</b>	<b>Amount</b>
01-01-2024	Eric Hillerman	B210 – Business Operations Work regarding ops insurance.	0.10	325.00	32.50
01-02-2024	Eric Hillerman	B210 – Business Operations Work regarding operations insurance with S. Robinowitz and work regarding royalty escheatment to multiple states with accountants and escheatment contractors.	1.40	325.00	455.00
01-04-2024	Eric Hillerman	B210 – Business Operations Work regarding multi-state escheatment issues and incorporation issues/state escheatment reciprocity issues.	0.60	325.00	195.00
01-08-2024	Eric Hillerman	B210 – Business Operations Work regarding TRCC notices, GLO accounts; farm-out agreement, inquiries from land owners and escheatment.	1.30	325.00	422.50
01-09-2024	Eric Hillerman	B210 – Business Operations Work regarding AG Office settlement call; work regarding escheat issues; Dodson Prairie enforcement actions; TRRC complaints; work regarding Panther City enforcement actions; work regarding Enterprise Products force majeure notice; work regarding Spearpoint equity assignment agreement.	2.40	325.00	780.00
01-10-2024	Eric Hillerman	B210 – Business Operations Work regarding Summit Petroleum/Eldorado yard issue; work regarding numerous complaints and hearing notices from TRRC regarding Dodson; Panther City; Barron and Arccoil wells. Work regarding escheatment. Work regarding AG/TRRC potential resolution and claims.	3.50	325.00	1,137.50
01-11-2024	Eric Hillerman	B210 – Business Operations Work regarding TRRC complaints and hearings.	0.40	325.00	130.00
01-11-2024	Darrell Jones	BT155 – Status Reports Prepare inserts to quarterly status report.	0.50	325.00	162.50
01-12-2024	Eric Hillerman	B210 – Business Operations Work regarding Texas AG /Texas RRC Complaints and resolution proceedings. Work regarding escheat.	0.20	325.00	65.00

Date	Professional	Task	Hours	Rate	Amount
01-17-2024	Eric Hillerman	B210 – Business Operations Work regarding TRRC additional notices. Work with TxAG's office regarding dispute resolution with TRRC complaints. Work regarding escheat.	0.80	325.00	260.00
01-22-2024	Eric Hillerman	B210 – Business Operations Work regarding TRRC notices, escheatment and TXAG negotiations.	0.40	325.00	130.00
01-23-2024	Eric Hillerman	B210 – Business Operations Work with contractors regarding escheatment issues and multiple jurisdictional requirements. Work regarding lien filed on farmout property. Work regarding TX AG office negotiations.	1.30	325.00	422.50
01-24-2024	Eric Hillerman	B210 – Business Operations Work regarding escheat and gulf coast statement.	0.40	325.00	130.00
01-25-2024	Eric Hillerman	B210 – Business Operations Work regarding TX AG negotiations; work regarding escheatment; work regarding farm-out lien issues and issues with SDMB Resources performance.	1.00	325.00	325.00
01-29-2024	Eric Hillerman	B210 – Business Operations Work regarding TRRC potential settlement.	0.20	325.00	65.00
01-30-2024	Eric Hillerman	B210 – Business Operations Work regarding energy net/buyer purchase issues.	0.50	325.00	162.50
01-31-2024	Eric Hillerman	B210 – Business Operations Work regarding plugging issues. Work regarding insurance and farmout issues.	0.50	325.00	162.50
				<b>Total</b>	5,037.50

**Time Summary**

Professional	Hours	Amount
Darrell Jones	0.50	162.50
Eric Hillerman	15.00	4,875.00
<b>Total</b>		5,037.50
<b>Total for this Invoice</b>		5,037.50

## Law Practice of Darrell R. Jones, PLLC

drj@oilesquire.com

(832) 302-5373

March 05, 2024

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

**Invoice Number: 947**

Invoice Period: 02-01-2024 - 02-29-2024

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

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

<b>Date</b>	<b>Professional</b>	<b>Task</b>	<b>Hours</b>	<b>Rate</b>	<b>Amount</b>
02-02-2024	Eric Hillerman	B210 – Business Operations Work regarding Enegynet issues.	0.30	325.00	97.50
02-05-2024	Eric Hillerman	B210 – Business Operations Work regarding TRRC notices; GLO reports, escheat agreement and plugging bond issues.	0.70	325.00	227.50
02-06-2024	Eric Hillerman	B210 – Business Operations Work regarding negotiations with Texas AG/TRRC.	0.20	325.00	65.00
02-08-2024	Eric Hillerman	B210 – Business Operations Work regarding plugging issues; work regarding TXRRC field inspector issues; work regarding liens on farm-out property and potential remedies; work regarding TRRC plugging claims.	1.10	325.00	357.50
02-13-2024	Eric Hillerman	B210 – Business Operations Work regarding TRRC notice regarding pollution claim on site.	0.30	325.00	97.50
02-14-2024	Eric Hillerman	B210 – Business Operations Work regarding Enegynet closure and escheat contract.	0.30	325.00	97.50
02-15-2024	Eric Hillerman	B210 – Business Operations Work regarding landowner issue; work regarding bond issue with TRRC and multiple TRRC notices.	0.80	325.00	260.00
02-16-2024	Eric Hillerman	B210 – Business Operations Work regarding Lolita Long #2 pollution issue with TRRC. Work regarding Enegynet accord.	0.40	325.00	130.00
02-19-2024	Eric Hillerman	B210 – Business Operations Work regarding farm-out issues and TRRC new complaints and new lien claims.	0.40	325.00	130.00
02-20-2024	Eric Hillerman	B210 – Business Operations Work regarding TRRC complaints and hearing notices; work regarding Tx AG negotiations; work regarding farm-out.	0.40	325.00	130.00

Date	Professional	Task	Hours	Rate	Amount
02-26-2024	Eric Hillerman	B210 – Business Operations Work regarding escheat matters. Work regarding Gulf Coast statement.	0.30	325.00	97.50
02-28-2024	Eric Hillerman	B210 – Business Operations Work regarding issues regarding farm-out property. Review TRRC notices.	0.60	325.00	195.00
02-29-2024	Eric Hillerman	B210 – Business Operations Work regarding farm-out. Work regarding inquiries regarding ops and abandonment issues.	1.70	325.00	552.50
<b>Total</b>					2,437.50

**Time Summary**

Professional	Hours	Amount
Eric Hillerman	7.50	2,437.50
<b>Total</b>		2,437.50

**Total for this Invoice** 2,437.50

drj@oilesquire.com  
(832) 302-5373

April 05, 2024

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

**Invoice Number: 964**

Invoice Period: 03-01-2024 - 03-31-2024

Payment Terms: Upon Receipt

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

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

**Time Details**

<b>Date</b>	<b>Professional</b>	<b>Task</b>	<b>Hours</b>	<b>Rate</b>	<b>Amount</b>
03-01-2024	Eric Hillerman	B210 – Business Operations	0.60	325.00	195.00
		Work regarding issue with gas purchaser on Shirley wells and notice to TRRC. Work regarding Gulf Coast payment issues.			
03-04-2024	Eric Hillerman	B210 – Business Operations	0.50	325.00	162.50
		Work regarding Quatro Oil's injection permit notice from TRRC.			
03-05-2024	Eric Hillerman	B210 – Business Operations	1.10	325.00	357.50
		Work regarding pipeline notice to disconnect gas meters, TX AG stipulation terms on plugging claim, and negotiations with TX AG/TXRRC regarding Shirley gas well connections. Work regarding new mineral lien notices.			
03-07-2024	Eric Hillerman	B210 – Business Operations	1.20	325.00	390.00
		Work regarding SDMB farmout.			
03-08-2024	Eric Hillerman	B210 – Business Operations	1.60	325.00	520.00
		Work regarding issues with SDMB farmout and lien issues.			
03-09-2024	Eric Hillerman	B210 – Business Operations	0.40	325.00	130.00
		Work regarding farmout issues.			
03-11-2024	Eric Hillerman	B210 – Business Operations	0.50	325.00	162.50
		Work regarding additional lien issues and farmout surface use agreement.			
03-12-2024	Darrell Jones	B210 – Business Operations	1.00	325.00	325.00
		Discussion with Eric H on farmout matters/defaults.			
03-12-2024	Eric Hillerman	B210 – Business Operations	0.40	325.00	130.00
		Work regarding Soto Inc/Barron Petroleum Supplement Agreement regarding surface use on Farmout area.			
03-13-2024	Eric Hillerman	B210 – Business Operations	0.50	325.00	162.50
		Work regarding TRRC notices and farmout.			
03-14-2024	Eric Hillerman	B210 – Business Operations	0.30	325.00	97.50
		Work regarding new TRRC notices.			
03-17-2024	Darrell Jones	B210 – Business Operations	1.00	325.00	325.00
		Meeting with Hillerman over SDMB Farmout issues, options and guidance to client.			

Date	Professional	Category	Hours	Rate	Amount
03-18-2024	Eric Hillerman	B210 – Business Operations	0.20	325.00	65.00
Work regarding Grahame Clark #1 Well and Mash Oilfield Services. Work regarding escheatment.					
03-21-2024	Eric Hillerman	B210 – Business Operations	0.20	325.00	65.00
Work regarding TRRC notices.					
03-22-2024	Eric Hillerman	B210 – Business Operations	0.40	325.00	130.00
Work regarding inquiries from farmout surface owners regarding geology and operations. Work regarding Gulf Coast statement and inquiry to SDMB counsel.					
03-25-2024	Eric Hillerman	B210 – Business Operations	0.30	325.00	97.50
Work regarding TRRC notices and liens on farmout property.					
03-26-2024	Eric Hillerman	B210 – Business Operations	0.20	325.00	65.00
Work regarding issue regarding pipeline on Shurley leases.					
03-27-2024	Eric Hillerman	B210 – Business Operations	0.20	325.00	65.00
Work regarding TRRC notices including water issue and OAG working with TRRC to clear up issue.					
03-30-2024	Eric Hillerman	B210 – Business Operations	0.20	325.00	65.00
Work regarding status report on farmout property.					

**Total** 3,510.00

**Time Summary**

**Professional**

Darrell Jones  
Eric Hillerman

Hours	Amount
2.00	650.00
8.80	2,860.00

**Total** 3,510.00

**Total for this Invoice** 3,510.00

**EXHIBIT E-4**



# Vicki Palmour Consulting, LLC

PO Box 1925  
Graham Texas 76450

Date	Invoice #
1/31/2024	20015

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
	<b>REGULATORY WORK</b>		
4.5	BT210 - VP - 1/9/24 - Research Heartland Property Dockets, Pull Documents, etc for Dockets, Emails, Phone Con with Danielle, etc.	100.00	450.00
2	BT210 - TG - 1/24/24 - Pull PR Data, etc. for 2023 on Barron; Dodson Prairie; Panther City; ArcoOil	100.00	200.00
	<b>ACCOUNTING WORK</b>		
2	BT120 - AA - 1/4/24 - Work on Escheatment	100.00	200.00
2.5	BT120 - AA - 1/29/24 - Prepare and File 1099's for Barron (160 Pages)	100.00	250.00
	Sales Tax	6.75%	0.00

<b>Total</b>	<b>\$1,100.00</b>
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**EXHIBIT E-5**



**Ahuja & Consultants, Inc.**  
Certified Public Accountants

**Ahuja & Consultants, Inc.**

2901 N. Dallas Pkwy  
Suite 320  
Plano, TX 75093

**Invoice # 8231.HL**  
**Invoice Date: 03/31/2024**  
**Due Date: 04/30/2024**

Bill To:  
Dykema  
Attn: Deborah Williamson

**Q1 2024 BILLING SUMMARY**

<b>TASK</b>	<b>TASK DESCRIPTION</b>	<b>HOURS</b>	<b>AMOUNT</b>
2900	Accounting/Auditing	128.10	\$25,551.00
3900	Tax Issues	126.70	\$34,482.50
4900	Forensic Accounting	183.70	\$45,671.50
	Expense Reimbursement		\$155.76

**TOTAL** **\$105,860.76**



**Ahuja & Consultants, Inc.**  
 Certified Public Accountants

**Ahuja & Consultants, Inc.**

2901 N. Dallas Pkwy  
 Suite 320  
 Plano, TX 75093

**Invoice # 8231.HL**  
**Invoice Date: 03/31/2024**  
**Due Date: 04/30/2024**

Bill To:  
 Dykema  
 Attn: Deborah Williamson

**Q1 2024 BILLING SUMMARY**

<b>ID</b>	<b>TIMEKEEPER</b>	<b>TITLE</b>	<b>HOURS</b>	<b>RATE</b>	<b>AMOUNT</b>
CB	Carolyn Bremer	Engagement Leader	40.50	\$325.00	\$13,162.50
DP	Dawn Peterson	Admin	1.00	\$95.00	\$95.00
DS	Divya Shetty	Manager	87.50	\$250.00	\$21,875.00
JB	Jeanne-Marie Blevins	Associate	49.80	\$120.00	\$5,976.00
MA	Madhu Ahuja	Engagement Leader	47.70	\$325.00	\$15,502.50
NTH	Natasha Toeteberg – Harms	Sr. Associate	55.80	\$180.00	\$10,044.00
SH	Stacey Huser	Manager	79.50	\$250.00	\$19,875.00
TC	Tony Cecil	CPA	76.70	\$250.00	\$19,175.00

**TOTAL                      438.50                      \$105,705.00**



**Ahuja & Consultants, Inc.**  
Certified Public Accountants

**Ahuja & Consultants, Inc.**

2901 N. Dallas Pkwy  
Suite 320  
Plano, TX 75093

**Invoice # 8231.HL**  
**Invoice Date:** 03/31/2024  
**Due Date:** 04/30/2024

Bill To:  
Dykema  
Attn: Deborah Williamson

**Q1 2024 Expense Reimbursement**

<b>DESCRIPTION</b>	<b>AMOUNT</b>
Valid 8 Bank Transactions	\$46.36
Valid 8 Check Detail	\$27.60
1099 Filing Fees	\$63.04
1099 Postage	\$18.76

**TOTAL** **\$155.76**



**Ahuja & Consultants, Inc.**  
Certified Public Accountants

**Ahuja & Consultants, Inc.**

2901 N. Dallas Pkwy  
Suite 320  
Plano, TX 75093

**Invoice # 8231.HL**  
**Invoice Date: 03/31/2024**  
**Due Date: 04/30/2024**

Bill To:  
Dykema  
Attn: Deborah Williamson

Date	ID	Description	Task	Hours	Amount
01/04/24	JB	Enter data for two bank accounts for November 2023, review vendors for 2023 1099s	2900	4.00	\$480.00
01/05/24	JB	Entered data and reconciled two bank accounts for November 2023; started 2023 Q4 Standard Fund Accounting Report (SFAR)	2900	4.50	\$540.00
01/05/24	TC	Review 1/4/2024 Claims report provided by Stretto; research disputed claims and add A&C comments to claims schedule	4900	1.20	\$300.00
01/08/24	CB	Follow up on investor claim question from Ms. Behrends	4900	0.40	\$130.00
01/09/24	SH	Update meeting with Ms. Williamson, Ms. Behrends, Ms. Ahuja, and Mr. Cecil	2900	0.30	\$75.00
01/09/24	MA	Update meeting with Ms. Williamson, Ms. Behrends, Ms. Huser, and Mr. Cecil	3900	0.30	\$97.50
01/09/24	JB	Completed accounting for Q4. Prepared and completed 2023 Q4 SFAR for first review	2900	6.50	\$780.00
01/09/24	TC	Update meeting with Ms. Williamson, Ms. Behrends, Ms. Huser, and Ms. Ahuja	4900	0.30	\$75.00
01/15/24	SH	Q4 and SFAR review; questions to Receiver; updating year-end entity allocations by entity	2900	5.30	\$1,325.00
01/16/24	JB	Update 2023 Q4 SFAR with information provided by attorney, as well as update QuickBooks file with said information	2900	1.00	\$120.00
01/17/24	SH	Respond to Receiver's request for documentation	2900	0.10	\$25.00
01/17/24	MA	Respond to emails and request from Ms. Behrends regarding financials and tax returns	3900	0.50	\$162.50
01/17/24	TC	Review 1/12/2024 Claim report provided by Stretto and perform research relating to new disputed investor claims; document research performed	4900	2.30	\$575.00
01/17/24	SH	Update operating entities' balance sheets for Receiver with 2023 transaction data	2900	1.00	\$250.00
01/18/24	SH	Discussion with Ms. Williamson, Ms. Behrends, and Ms. Ahuja regarding expense allocations and operating entities	2900	0.40	\$100.00
01/18/24	CB	Reviewed responses to disputed claims (30 minutes). Communication with Mr. Cecil regarding disputed claims schedule (24 minutes)	4900	0.90	\$292.50
01/18/24	MA	Call with Ms. Behrends, Ms. Williamson, and Ms. Huser regarding allocation of expenses and income for the Railroad Commission	3900	0.40	\$130.00
01/18/24	SH	Classifying and updating transactions to applicable entities; begin draft allocation calculations for 2023 receivership expenses; draft to Receiver	2900	5.80	\$1,450.00

Date	ID	Description	Task	Hours	Amount
01/18/24	TC	Call with Ms. Bremer to discuss investor claim dispute schedule prepared by Stretto.	4900	0.40	\$100.00
01/19/24	SH	Revise format, update data, reclass transactions and allocations	2900	4.00	\$1,000.00
01/19/24	MA	Review of allocation worksheet for Railroad Commission	3900	1.00	\$325.00
01/22/24	MA	Continue to review expense allocation spreadsheet	3900	1.00	\$325.00
01/22/24	SH	Revise and update expense allocation draft workpaper	2900	3.50	\$875.00
01/22/24	TC	Review 1/18/2024 Claim report prepared by Stretto. Research new disputed investor claims; document research	4900	2.30	\$575.00
01/22/24	CB	Communication with Ms. Williamson, Ms. Behrends and Mr. Cecil regarding responses to disputed claims	4900	0.60	\$195.00
01/22/24	MA	Discussion with Ms. Williamson, Ms. Behrends, and Ms. Huser regarding allocation of Receivership expenses	3900	0.80	\$260.00
01/22/24	SH	Discussion with Ms. Williamson, Ms. Behrends, and Ms. Ahuja regarding allocation of Receivership expenses	2900	0.80	\$200.00
01/22/24	TC	Review comments prepared by Ms. Bremer on 1/12/2024 disputed investor claim analysis schedule	4900	1.20	\$300.00
01/22/24	TC	Communication with Ms. Williamson, Ms. Behrends and Ms. Bremer regarding responses to disputed claims	4900	0.60	\$150.00
01/23/24	JB	Allocation of expenses between operating entities	2900	2.70	\$324.00
01/23/24	JB	Review list of vendors and accounts for 2023 Forms 1099	2900	2.80	\$336.00
01/23/24	CB	Review of files with disputed claims	4900	0.70	\$227.50
01/23/24	SH	Calculate and prepare operating entity cash balance reports from beginning of receivership	2900	1.70	\$425.00
01/23/24	TC	Continue to review and research new disputed investor claims from the 1/18/2024 investor Claim report; document research performed	4900	1.60	\$400.00
01/23/24	TC	Call with Stretto team and Ms. Bremer to discuss setup of Investor Claim report	4900	0.40	\$100.00
01/23/24	CB	Call with the Stretto team and Mr. Cecil (24 minutes). Review of investor claim information submitted in claims process (12 minutes)	4900	0.60	\$195.00
01/24/24	MA	Review of funds in Arcooil for 2021 and 2022	3900	0.50	\$162.50
01/24/24	SH	Calculation and preparation of reports for cash activity of operating entities from inception of receivership	2900	3.50	\$875.00
01/24/24	JB	Review list of vendors and accounts for 2023 Forms 1099	2900	2.00	\$240.00
01/25/24	JB	Continue review of vendor list and accounts for 2023 Forms 1099	2900	2.50	\$300.00
01/25/24	CB	Reviewed new claims report from Stretto	4900	0.40	\$130.00
01/25/24	NTH	Research of distribution method examples, including prior case examples and calculations	4900	1.00	\$180.00
01/26/24	NTH	Continue research of distribution method examples, including prior case examples and calculations	4900	6.50	\$1,170.00
01/26/24	CB	Review interest payments for disputed claim per bank statements and Heartland files	4900	0.60	\$195.00
01/26/24	SH	Discussion with Ms. Williamson and Ms. Behrends regarding cash tracing for operating entities from inception of receivership; update workpapers based on discussion; review 1099 data	2900	1.30	\$325.00
01/29/24	NTH	Analyzing request from Receiver regarding a comparison between the two widely accepted distribution approaches. Preparing templates to input sample data to illustrate outcomes based on potential distribution amount	4900	8.00	\$1,440.00
01/29/24	JB	Reviewed allocation and updated allocation based on a discussion with Ms. Huser	2900	2.50	\$300.00
01/29/24	TC	Review the 1/25/2024 Claim report provided by Stretto and begin to research new disputed investor claims; document research performed	4900	2.70	\$675.00
01/29/24	SH	1099 allocation review; update and finalize Q4 SFAR and cash disbursements report	2900	2.00	\$500.00

Date	ID	Description	Task	Hours	Amount
01/30/24	NTH	Analyzing request from Receiver regarding a comparison between the two widely accepted distribution approaches. Preparing templates to input sample data to illustrate outcomes based on potential distribution amount	4900	8.00	\$1,440.00
01/30/24	JB	Researched possible 1099 recipients to retrieve W9, contacted such vendors, and updated 1099 workpaper accordingly, update allocation	2900	2.90	\$348.00
01/30/24	SH	Review of calculations related to allocations of 1099 Receivership expenses	2900	1.50	\$375.00
01/30/24	TC	Answer question from Ms. Behrends regarding number of investors with Heartland investments, not including investors that are included in the Heartland portal with no investments	4900	0.60	\$150.00
01/30/24	CB	Research investor question from Ms. Behrends	4900	0.40	\$130.00
01/31/24	NTH	Analyzing the comparison between the two widely accepted distribution approaches. Preparing templates to input sample data for calculation examples. Preparing document to summarize methods and outcomes of each approach. Develop visual graphs to determine optimum approach for the distribution	4900	8.00	\$1,440.00
01/31/24	SH	1099 allocations, data review, 1099 preparation and filings	2900	4.50	\$1,125.00
01/31/24	CB	Reviewed disputed claims of investor deposits or interest payments per bank records and other Heartland files	4900	1.40	\$455.00
01/31/24	JB	Contacted vendors to gather W9s, completed 1099 workpaper and allocation, updated QuickBooks file accordingly	2900	2.80	\$336.00
02/01/24	CB	Reviewed updated disputed claims report	4900	0.40	\$130.00
02/01/24	TC	Begin review of 2/1/2024 Claims report provided by Stretto; perform research relating to new disputed investor claims; document research	4900	2.40	\$600.00
02/02/24	JB	Preparation of 2023 Form 1099	2900	2.20	\$264.00
02/05/24	JB	Accounting for the period 2023	2900	0.50	\$60.00
02/06/24	TC	Continue to review and research the 2/1/2024 disputed investor claims from report provided by Stretto	4900	2.60	\$650.00
02/08/24	JB	Accounting for the period January 2024	2900	2.20	\$264.00
02/12/24	TC	Begin review of 2/7/2024 Claims report provided by Stretto; perform research relating to new disputed investor claims; document research	4900	4.60	\$1,150.00
02/13/24	SH	Review of allocations; assign entity for royalty payments per 1099 documents provided	2900	3.60	\$900.00
02/14/24	CB	Researching disputed claims	4900	0.80	\$260.00
02/14/24	JB	Accounting for the period 2023	2900	5.60	\$672.00
02/14/24	SH	Review of year-end journal entries	2900	1.50	\$375.00
02/15/24	JB	Continue accounting for the period 2023	2900	3.50	\$420.00
02/15/24	SH	Review calculations and allocations for income from production reports, update books and allocation workpapers	2900	4.00	\$1,000.00
02/16/24	CB	Review of analysis and summary related to the options for a distribution plan	4900	0.90	\$292.50
02/16/24	DS	Review expenses allocation basis for asset sale and hard assets	3900	2.00	\$500.00
02/16/24	TC	Perform additional research relating to the disputed investor claims where investor states they made an investment, but Heartland did not credit the investor. Document research	4900	3.00	\$750.00
02/18/24	CB	Review and edit summary related to distribution plans	4900	0.80	\$260.00
02/19/24	CB	Researching, reviewing, and editing distribution document for Receiver	4900	4.70	\$1,527.50
02/19/24	CB	Communication with Ms. Toeteberg-Harms and Ms. Ahuja regarding draft distribution document	4900	0.80	\$260.00
02/19/24	MA	Communication with Ms. Toeteberg-Harms and Ms. Bremer regarding draft distribution document	3900	0.80	\$260.00
02/19/24	MA	Review distribution mechanism calculations and memo	4900	1.20	\$390.00



Date	ID	Description	Task	Hours	Amount
02/19/24	NTH	Communication with Bremer and Ms. Ahuja regarding draft distribution document	4900	0.80	\$144.00
02/19/24	NTH	Analyzing the distribution methods based on receivership's circumstances	4900	6.50	\$1,170.00
02/19/24	SH	Researching potential investor deposit transactions in QuickBooks	4900	0.70	\$175.00
02/19/24	SH	Accounting for the period 2023; allocation adjustments and calculations for various tax scenarios	2900	2.50	\$625.00
02/20/24	CB	Researching, reviewing, and editing distribution document for Receiver	4900	3.50	\$1,137.50
02/20/24	CB	Researching disputed claims to validate amounts disputed	4900	0.90	\$292.50
02/20/24	CB	Communication with Ms. Behrends and Mr. Cecil regarding disputed claims	4900	0.70	\$227.50
02/20/24	DS	Continue review of expense allocation	3900	0.50	\$125.00
02/20/24	DS	Review supporting documents for the income accounted to respective entities	3900	2.20	\$550.00
02/20/24	DS	Discussion with Ms. Huser on allocation of expenses based on hard asset	3900	0.50	\$125.00
02/20/24	NTH	Analyzing the cost/benefit of various distribution methods and preparing the calculation template	4900	7.50	\$1,350.00
02/20/24	SH	Researching potential investor deposit transactions in QuickBooks	4900	0.70	\$175.00
02/20/24	TC	Communication with Ms. Behrends and Ms. Bremer regarding disputed claims	4900	0.70	\$175.00
02/20/24	SH	Discussion with Ms. Shetty on allocation of expenses based on hard assets	2900	0.50	\$125.00
02/20/24	SH	Accounting for the period 2023; allocation adjustments and calculations for various tax scenarios	2900	3.00	\$750.00
02/21/24	DS	Prepare for tax work, review, and rollover workpapers for 2022	3900	2.00	\$500.00
02/21/24	TC	Update 2/7/2024 investor claims dispute schedule; develop additional schedule to list new investor Net Transaction amounts and revised investor Net Transaction amounts	4900	3.10	\$775.00
02/21/24	SH	Accounting for the period 2023; allocation adjustments and calculations for various tax scenarios; searching database for original property purchase documents	2900	3.50	\$875.00
02/22/24	CB	Research and review of all responses related to disputed claims and review of edits to new or revised net transaction amounts	4900	2.60	\$845.00
02/22/24	DS	Verifying the Barron Petroleum ledger to ascertain the hard assets & prepare the tax return for Alternative Office Solutions, LLC & Heartland Drilling Fund I	3900	5.00	\$1,250.00
02/22/24	SH	Researching potential investor deposit transactions in QuickBooks	4900	0.30	\$75.00
02/22/24	SH	Accounting for the period 2023; allocation adjustments and calculations for various tax scenarios	2900	3.00	\$750.00
02/23/24	DS	Prepare Tax Return for Carson Oil Field Development, Sahota Capital LLC, Barron Energy Corporation & update the numbers & Work papers for HDF I & update Workpapers for AOS	3900	5.00	\$1,250.00
02/23/24	TC	Research outstanding investor dispute claims and document research	4900	1.80	\$450.00
02/23/24	SH	Accounting for the period 2023; allocation adjustments and calculations for various tax scenarios	2900	2.50	\$625.00
02/26/24	CB	Communication with Mr. Cecil and Ms. Behrends on revised transaction schedule information related to disputed claims	4900	0.20	\$65.00
02/26/24	DS	Preparation of Arco Oil Tax return	3900	6.20	\$1,550.00
02/26/24	TC	Communication with Ms. Bremer and Ms. Behrends on revised transaction schedule information related to disputed claims	4900	0.20	\$50.00
02/26/24	TC	Review new 2/22/24 Stretto Claims report; identify new investors with claim disputes; update add/revise Net Transaction amount schedule	4900	1.30	\$325.00

Date	ID	Description	Task	Hours	Amount
02/27/24	CB	Communication with Ms. Williamson, Ms. Behrends, and Ms. Toteberg-Harms regarding distribution process (30 minutes). Communication with Ms. Behrends and Mr. Cecil regarding add/revise net transaction amounts (24 minutes)	4900	0.90	\$292.50
02/27/24	DS	Prepare tax return for Dallas Resource Inc & The Heartland Group Ventures	3900	5.50	\$1,375.00
02/27/24	NTH	Communication with Ms. Behrends, Ms. Williamson, and Ms. Bremer regarding investor distribution approaches and determining which is most suitable	4900	0.50	\$90.00
02/27/24	SH	Analyzing and responding to various requests from Receiver related to possible investor deposits	4900	0.50	\$125.00
02/27/24	TC	Call with Ms. Behrends and Ms. Bremer to discuss Add/revise Net Transaction amounts	4900	0.40	\$100.00
02/27/24	TC	Perform detailed review of the 201-investor list representing investors with no net transaction amounts; identified investors that need further research to determine if Heartland received investor funds	4900	4.40	\$1,100.00
02/27/24	SH	Review documents in Relativity for source documents related to cost basis of property sold	2900	1.80	\$450.00
02/28/24	CB	Review of new transaction schedules from Stretto related to disputed claim.	4900	0.70	\$227.50
02/28/24	DS	Prepare Heartland Group Fund Tax Return	3900	3.70	\$925.00
02/29/24	CB	Tracing funds to validate source of proceeds for Bahama property purchase	4900	1.60	\$520.00
02/29/24	DS	Update the supporting workpaper for all 5 entities (AOS, Barron Energy, Sahota, HDF I, Carson) (2 hrs.) Show the assets as disposed on the tax return, call the CCH (to clarify why the assets disposed of is not getting subtracted from the beginning balance) Rework of assets as disposed of instead of sale at Zero value & discussion with Ms. Ahuja	3900	6.00	\$1,500.00
02/29/24	MA	Discussion with Ms. Shetty regarding tax exposure memo; Bahamas assets	3900	2.00	\$650.00
02/29/24	TC	Perform research to trace funds through bank records to identify source of funds relating to the Bahama real estate payments.	4900	4.60	\$1,150.00
02/29/24	SH	Analyzing and responding to various requests from the Receiver related to Bahamas properties and related entries in accounting records and bank activity	2900	2.90	\$725.00
03/01/24	CB	Tracing funds related to purchase of Bahamas property and communication with Ms. Behrends regarding Bahamas purchases	4900	5.60	\$1,820.00
03/01/24	DP	Preparation and filing of federal Extension for the following entities: Arcooil Corp, Barron Energy Corporation, Carson Oil Field Development Fund II, LP, Dallas Resources, Inc, Encypher Bastion LLC, Heartland Drilling Fund I, Heartland Group Fund III LLC, Heartland Group Ventures, LLC – Dodson & Panther, Alternative Office Solutions, LLC, and Sahota Capital LLC	3900	1.00	\$95.00
03/01/24	DS	Update Dallas Resource tax return for change in the land cost price. Prepare the Encypher Bastion Tax Return, Update the tax return for Heartland Group Ventures	3900	4.00	\$1,000.00
03/01/24	MA	Review emails from Ms. Behrends, review Barron balance sheet and guide staff to pull transactions from bank statements for payments related to Bahamas properties	3900	1.00	\$325.00
03/01/24	SH	Tracing funds related to purchase of Bahamas property	2900	3.80	\$950.00
03/01/24	TC	Continue performing research relating to funds tracing to identify the source of funding for Bahama real estate payments; document research performed	4900	1.70	\$425.00
03/04/24	DS	Work on tax exposure worksheet	3900	2.50	\$625.00
03/04/24	DS	Update the work paper in 5 entities for Hard Assets (Barron) & income supporting (AOS, Barron Energy, Carson, HDF-I, Sahota)	3900	0.90	\$225.00

Date	ID	Description	Task	Hours	Amount
03/04/24	MA	Review of tax questions for Receiver	3900	1.00	\$325.00
03/04/24	SH	Update of workpapers regarding hard assets and related allocations	2900	1.10	\$275.00
03/04/24	TC	Update Disputed Investor claims schedule based on responses from investors; prepare list of Notice Only investors that need additional research and send to Ms. Behrends	4900	1.90	\$475.00
03/05/24	CB	Communication with Ms. Williamson, Ms. Behrends, Ms. Ahuja, Ms. Huser, and Mr. Cecil regarding updates and status	4900	0.60	\$195.00
03/05/24	MA	Response to IRS notice	3900	0.50	\$162.50
03/05/24	MA	Review IRS exposure worksheet	3900	1.00	\$325.00
03/05/24	MA	Communication with Ms. Williamson, Ms. Behrends, Ms. Bremer, Ms. Huser, and Mr. Cecil regarding updates and status	3900	0.60	\$195.00
03/05/24	SH	Communication with Ms. Williamson, Ms. Behrends, Ms. Ahuja, Ms. Bremer, and Mr. Cecil regarding updates and status of open items	2900	0.60	\$150.00
03/05/24	TC	Communication with Ms. Williamson, Ms. Behrends, Ms. Ahuja, Ms. Huser, and Ms. Bremer regarding updates and status	4900	0.60	\$150.00
03/05/24	TC	Update investors disputed claims schedule and send to Ms. Behrends	4900	0.40	\$100.00
03/06/24	DS	Allocating expenses to entities based on the property title for Bahamas property	3900	0.50	\$125.00
03/06/24	MA	Respond to questions regarding Bahamas tracing	3900	0.50	\$162.50
03/06/24	TC	Using bank records, develop summary schedule for funds tracing relating to Bahama real estate payments.	4900	2.10	\$525.00
03/07/24	SH	Research related to notice of returns not filed per IRS records	2900	0.70	\$175.00
03/08/24	SH	Review of payroll data available; response to correspondence from IRS	2900	1.20	\$300.00
03/08/24	TC	Continue developing summary schedule for funds tracing relating to Bahama real estate payments	4900	2.60	\$650.00
03/12/24	CB	Review of updated tracing of Bahama payments	4900	0.50	\$162.50
03/12/24	MA	Review response to IRS	3900	0.50	\$162.50
03/12/24	SH	Review of bank and payroll data for summary response to IRS notice	2900	1.00	\$250.00
03/12/24	TC	Complete summary schedule for funds tracing relating to Bahamas real estate payments; verify data on funds tracing schedule using bank records	4900	3.30	\$825.00
03/13/24	CB	Communication with Ms. Behrends and Mr. Cecil regarding Bahamas tracing and additional investor information received	4900	0.90	\$292.50
03/13/24	DS	Allocation of expense & reclassification of expense & discussion on farmout agreement	3900	0.40	\$100.00
03/13/24	TC	Call with Ms. Behrends and Ms. Bremer to review summary schedule showing funds tracing relating to Bahamas real estate payments	4900	0.90	\$225.00
03/13/24	TC	Update summary schedule for funds tracing relating to Bahamas payments; begin reviewing additional SEC information relating to potential additional investors	4900	2.50	\$625.00
03/14/24	DS	Review of the payroll numbers for Q4 2021 Heartland Group Ventures for preparation of payroll returns in response to IRS notice	2900	1.30	\$325.00
03/14/24	DS	Discussion with Ms. Ahuja and Ms. Huser on the Farmout agreement	3900	0.70	\$175.00
03/14/24	MA	Review of accounting for tax returns. Review of AOS tax return	3900	4.00	\$1,300.00
03/14/24	MA	Farmout Agreement review and discussion with Ms. Shetty	3900	1.00	\$325.00
03/14/24	SH	Review and analysis of 2021 payroll information and payroll report preparation	2900	2.60	\$650.00
03/15/24	CB	Review of summary from Mr. Cecil regarding Bahamas analysis	4900	0.20	\$65.00
03/15/24	TC	Begin searching electronic bank records for transactions relating to the Sahotas; document results of search	4900	1.90	\$475.00

Date	ID	Description	Task	Hours	Amount
03/18/24	DS	Calculation on the maximum tax liability that the entities may be liable for	3900	0.80	\$200.00
03/19/24	MA	Update call with Ms. Huser, Ms. Behrends and Ms. Williamson	3900	1.00	\$325.00
03/19/24	SH	Communication with Ms. Williamson, Ms. Behrends, and Ms. Ahuja regarding various open items	2900	1.00	\$250.00
03/19/24	TC	Update investor disputed claims schedule based on Receiver Responses and Investor consent forms; continue to review of new SEC information for potential additional investors	4900	4.30	\$1,075.00
03/20/24	DS	Verify all addresses for Carson Oil Filed & Heartland Drilling Fund I investors	3900	3.00	\$750.00
03/20/24	DS	Review of receivership allocation of expenses and income including balance sheet & disclosures for all entities	3900	3.00	\$750.00
03/20/24	MA	Continue review of accounting for all entities with supporting work papers	3900	6.00	\$1,950.00
03/20/24	TC	Develop net transaction amount schedules for two investors and send to Receiver; update disputed claims schedule based on Receiver Responses and Investor consent forms	4900	1.30	\$325.00
03/21/24	DS	Update all workpapers including disclosures. Prepare all tax returns for e-filing	3900	6.50	\$1,625.00
03/21/24	MA	Review of AOS, Barron Energy Corporation, Carson Oil, Heartland Drilling Fund I	3900	8.00	\$2,600.00
03/21/24	SH	Review and analysis of Sahota related deposits in Barron Petroleum WolfePak accounting records	4900	0.30	\$75.00
03/21/24	TC	Begin to develop A&C declaration relating to the tracing of funds used to purchase for Bahamas real estate	4900	6.00	\$1,500.00
03/22/24	CB	Review and edit declaration related to Bahamas fund tracing.	4900	1.10	\$357.50
03/22/24	CB	Researching and responding to request related to investor claim.	4900	0.40	\$130.00
03/22/24	DS	Tax Return Preparation for Dallas Resources Inc, Arco Oil Crop & Encypher Bastion	3900	7.00	\$1,750.00
03/22/24	MA	Review of Dallas Resources, Arcooil, Sahota Capital, Heartland Group Ventures, Heartland Group Fund III	4900	7.00	\$2,275.00
03/25/24	CB	Researching disputed investor claim	4900	0.40	\$130.00
03/25/24	DS	Prepare the combined workpaper for discussion with Receiver	3900	3.20	\$800.00
03/25/24	DS	Call with Ms. Williamson, Ms. Behrends, and Ms. Ahuja to discuss all tax returns	3900	1.10	\$275.00
03/25/24	JB	Accounting for the period February 2024	2900	1.00	\$120.00
03/25/24	MA	Review of Encypher Bastion	3900	1.00	\$325.00
03/25/24	MA	Review of work paper to be sent to the Receiver	3900	2.00	\$650.00
03/25/24	MA	Call with Ms. Williamson, Ms. Behrends, and Ms. Shetty to discuss all tax returns	3900	1.10	\$357.50
03/25/24	TC	Perform research on certain investors as requested by the Receiver; update disputed claims schedule based on Receiver Responses sent and Investor consent forms received	4900	2.20	\$550.00
03/26/24	CB	Review and edit of draft declaration related to tracing of Bahamas payments	4900	1.70	\$552.50
03/26/24	DS	Update the workpaper based on the call with the Receiver including disclosures and adjusting journal entries	3900	3.00	\$750.00
03/26/24	JB	Accounting for the period February 2024	2900	0.30	\$36.00
03/26/24	NTH	Creating visual diagrams for respective fund flows related to Bahamas purchases	4900	5.00	\$900.00
03/26/24	SH	Review of updates to year-end allocations based on conversations with Receiver	2900	0.50	\$125.00
03/27/24	CB	Review and drafting of Bahamas tracing declaration	4900	1.00	\$325.00
03/27/24	DS	Update the work papers & the tax return for Carson, HDF I, Dallas Resources, HGF III, HGV, Sahota, Encypher	3900	6.00	\$1,500.00
03/27/24	JB	Accounting for the period February 2024	2900	0.30	\$36.00
03/27/24	MA	Review of revised returns and workpapers	3900	3.00	\$975.00

<b>Date</b>	<b>ID</b>	<b>Description</b>	<b>Task</b>	<b>Hours</b>	<b>Amount</b>
03/27/24	TC	Review draft flowcharts prepared by Ms. Toeteberg-Harms depicting the funds tracing summary relating to the Bahamas real estate payments. Flowchart will be included in the A&C declaration	4900	1.20	\$300.00
03/28/24	CB	Drafting distribution declaration as requested by Receiver	4900	1.90	\$617.50
03/28/24	DS	Update the work papers & tax return, download the tax return for discussion with Receiver. Update the combined work paper for all entities	3900	5.00	\$1,250.00
03/29/24	CB	Review of updated distribution calculations from disputed claims process for declaration	4900	0.20	\$65.00
03/29/24	CB	Communication with Ms. Behrends and Mr. Cecil regarding status of all disputed investor claims	4900	0.50	\$162.50
03/29/24	NTH	Re-calculating distribution amounts based on disputed claim activity and adjusting distribution report based on updated figures	4900	4.00	\$720.00
03/29/24	TC	Update disputed claims schedule based on Receiver Responses sent and consent forms received	4900	0.60	\$150.00
03/29/24	TC	Communication with Ms. Behrends and Ms. Bremer regarding status of all disputed investor claims	4900	0.50	\$125.00

**Total** **\$105,705.00**

**Balance Due** **\$105,860.76**

**NOTE:** Total Fees are net of write off fees of \$9,405.00 primarily related to internal communications.

**EXHIBIT E-6**



410 Exchange, Ste 100  
 Irvine, CA 92602  
 855.812.6112

**Invoice:** 10387  
**Date:** 02/03/2024  
**Due Date:** 03/04/2024  
**Terms:** Net 30

**Bill To:**  
 Heartland

Item	Quantity	Unit Price	Amount
January 2024 Invoice			
Hourly Fees			\$6,340.00
Printing	320	\$0.10	\$32.00
Postage			\$37.29
Envelopes and Packaging – See Noticing Summary for details			\$4.65
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			\$44.10
<b>TOTAL DUE</b>			\$6,458.04
			THANK YOU.
<b>TOTAL ACCOUNT BALANCE DUE</b>			\$116,574.83

**For wire/ACH payments:**

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

**Remit Check Payments to:**

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



**Case Name:** Heartland

## Summary of Hourly Fees

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

<b>Role</b>	<b>Hours</b>	<b>Rate</b>	<b>Total</b>
Analyst I	1.4	\$30.00	\$42.00
Analyst II	7.5	\$40.00	\$300.00
Analyst III	3.6	\$50.00	\$180.00
Associate I	10.4	\$65.00	\$676.00
Associate II	2.8	\$97.50	\$273.00
Associate III	12.4	\$130.00	\$1,612.00
Director	13.0	\$185.00	\$2,405.00
Managing Director	2.8	\$210.00	\$588.00
Senior Associate	1.6	\$165.00	\$264.00
		<b>Total</b>	<b>\$6,340.00</b>





**Case Name:** Heartland

## Time Detail

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

Date	Employee Name	Role	Task	Description	Hours
01/02/2024	Aimee Marshall	Associate	Case Administration	Generate service of Heartland Notice + POC One Off Mailing – 1.2.24 mailing including printing and fulfillment	0.1
01/02/2024	Alberto Chachagua	Associate	Case Administration	Generate service of Heartland Notice + POC One Off Mailing – 1.2.24 mailing including printing and fulfillment	0.2
01/02/2024	Pauline Aragon	Associate	Case Administration	Coordinate service re: Letter per USPS forwarding instructions	0.4
01/02/2024	Robert Saraceni	Director	Case Administration	Review and respond to email inquiry from [REDACTED]	0.1
01/02/2024	Robert Saraceni	Director	Case Administration	Review and respond to Receiver's request for remail of notice and claim form to [REDACTED]	0.2
01/02/2024	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
01/02/2024	Stephanie Morales	Analyst	Case Administration	Record and track undeliverable mail re: various mailings	0.1
<b>Subtotal 01/02/2024</b>					<b>1.2</b>

Date	Employee Name	Role	Task	Description	Hours
01/03/2024	Charles Wheeler	Associate	Case Administration	Administrative review of mailing details	0.1
01/03/2024	Jacob Ingram	Associate	Case Administration	Administrative review of mailing details	0.1
01/03/2024	Laura Tondreault	Analyst	Case Administration	Prepare and organize general case documents for accuracy and completeness	0.1
01/03/2024	Melissa Membrino	Director	Case Administration	Coordinate address updates per USPS forwarding instructions	0.2
01/03/2024	Naomi Rodriguez	Associate	Case Administration	Administrative review of mailing details	0.1
01/03/2024	Pauline Aragon	Associate	Case Administration	Coordinate service re: Letter per USPS forwarding instructions	2.0
01/03/2024	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
01/03/2024	Staphany Alcantar	Analyst	Case Administration	Process, scan, and upload proofs of claim	0.2
01/03/2024	Staphany Alcantar	Associate	Case Administration	Input proofs of claim received into case management system	0.2
01/03/2024	Stephanie Morales	Analyst	Case Administration	Sort and manage incoming mail re: various mailings	0.1
01/03/2024	Stephanie Morales	Analyst	Case Administration	Record and track undeliverable mail re: various mailings	0.1

Date	Employee Name	Role	Task	Description	Hours
01/03/2024	Stephanie Morales	Analyst	Case Administration	Capture and track undeliverable mail images	0.1
<b>Subtotal 01/03/2024</b>					<b>3.5</b>
Date	Employee Name	Role	Task	Description	Hours
01/04/2024	Daniel Ramirez	Associate	Case Administration	Compiling undeliverable mail (returned/change of address)	1.5
01/04/2024	Kevin Wasserman	Associate	Case Administration	Creation of claims report.	1.0
01/04/2024	Laura Tondreault	Analyst	Case Administration	Prepare and organize general case documents for accuracy and completeness	0.2
01/04/2024	Monica Arellano	Associate	Case Administration	Coordinate service re: various docket nos. per USPS forwarding instructions	0.1
01/04/2024	Naomi Rodriguez	Associate	Case Administration	Administrative review of mailing details	0.1
01/04/2024	Robert Saraceni	Director	Case Administration	TC with [REDACTED] re support for submission of claim	0.6
01/04/2024	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
01/04/2024	Staphany Alcantar	Analyst	Claims Administration and Objections	Process, scan, and upload proofs of claim	0.2
01/04/2024	Staphany Alcantar	Associate	Claims Administration and Objections	Input proofs of claim received into case management system	0.2
<b>Subtotal 01/04/2024</b>					<b>4.1</b>
Date	Employee Name	Role	Task	Description	Hours
01/05/2024	Daniel Ramirez	Associate	Case Administration	Compiling undeliverable mail for Heartland	2.0
01/05/2024	Laura Tondreault	Analyst	Case Administration	Prepare and organize general case documents for accuracy and completeness	0.3
01/05/2024	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
01/05/2024	Stephanie Morales	Analyst	Case Administration	Record and track undeliverable mail re: various mailings	0.1
01/05/2024	Stephanie Morales	Analyst	Case Administration	Capture and track undeliverable mail images	0.1
01/05/2024	Stephanie Morales	Analyst	Case Administration	Sort and manage incoming mail re: various mailings	0.1
<b>Subtotal 01/05/2024</b>					<b>2.7</b>
Date	Employee Name	Role	Task	Description	Hours
01/08/2024	Lindsay Litt	Analyst	Case Administration	Sort and manage incoming mail re: various mailings	0.1
01/08/2024	Melissa Membrino	Director	Case Administration	Coordinate address updates per USPS forwarding instructions	0.2
01/08/2024	Pauline Aragon	Associate	Case Administration	Coordinate service re: Investor Letter per USPS forwarding instructions	1.0
01/08/2024	Robert Saraceni	Director	Case Administration	Begin review and detail documentation of returned mail	2.6

Date	Employee Name	Role	Task	Description	Hours
01/08/2024	Robert Saraceni	Director	Case Administration	Corr. review	0.8
01/08/2024	Robert Saraceni	Director	Claims Administration and Objections	Retrieve [REDACTED] Notice & Claim Form and draft corr. re submitting proof of claim.	0.3
01/08/2024	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
01/08/2024	Staphany Alcantar	Analyst	Case Administration	Correspondence with Stretto team re: processing correspondence	0.1
01/08/2024	Stephanie Morales	Analyst	Case Administration	Sort and manage incoming mail re: various mailings	0.1
<b>Subtotal 01/08/2024</b>					<b>5.4</b>

Date	Employee Name	Role	Task	Description	Hours
01/09/2024	IT Staff	Senior Associate	Case Administration	Address Updates - 1/9/2024	1.0
01/09/2024	Lindsay Litt	Analyst	Case Administration	Sort and manage incoming mail re: various mailings	0.1
01/09/2024	Robert Saraceni	Director	Case Administration	Review and respond to email inquiries, review and process address updates and request updates to Heartland database, update status tracker	3.2
01/09/2024	Robert Saraceni	Director	Case Administration	TC with Investor, [REDACTED], re claim form and status.	0.2
01/09/2024	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
01/09/2024	Stephanie Delgado	Associate	Case Administration	Oversee incoming undeliverable mail for accuracy and completeness	0.5
01/09/2024	Stephanie Morales	Analyst	Case Administration	Sort and manage incoming mail re: various mailings	0.1
01/09/2024	Stephanie Morales	Analyst	Case Administration	Record and track undeliverable mail re: various mailings	0.1
01/09/2024	Stephanie Morales	Analyst	Case Administration	Capture and track undeliverable mail images	0.1
<b>Subtotal 01/09/2024</b>					<b>5.5</b>

Date	Employee Name	Role	Task	Description	Hours
01/10/2024	Keny Contreras	Analyst	Claims Administration and Objections	Process, scan, and upload proofs of claim	0.3
01/10/2024	Keny Contreras	Associate	Claims Administration and Objections	Input proofs of claim received into case management system	0.5
01/10/2024	Lindsay Litt	Analyst	Case Administration	Sort and manage incoming mail re: various mailings	0.1
01/10/2024	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
01/10/2024	Stephanie Morales	Analyst	Case Administration	Sort and manage incoming mail re: various mailings	0.1
<b>Subtotal 01/10/2024</b>					<b>1.1</b>

Date	Employee Name	Role	Task	Description	Hours
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Date	Employee Name	Role	Task	Description	Hours
01/11/2024	Daniel Ramirez	Associate	Case Administration	Coordination with production for one off mailing 1.11.24	0.6
01/11/2024	Jose Cruz	Associate	Case Administration	Generate service of Heartland POC + Notice Mailing One Off 1.11.24 mailing including printing and fulfillment	0.2
01/11/2024	Kevin Wasserman	Associate	Case Administration	Creation/Circulation of Claims Report.	1.0
01/11/2024	Laura Tondreault	Analyst	Case Administration	Prepare and organize general case documents for accuracy and completeness	0.2
01/11/2024	Pauline Aragon	Associate	Case Administration	Coordinate service re: Investor Letter per USPS forwarding instructions	0.8
01/11/2024	Ricky Quang	Associate	Case Administration	Generate service of Heartland POC + Notice Mailing One Off 1.11.24 mailing including printing and fulfillment	0.1
01/11/2024	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
01/11/2024	Stephanie Morales	Analyst	Case Administration	Sort and manage incoming mail re: various mailings	0.1
01/11/2024	Stephanie Morales	Analyst	Case Administration	Record and track undeliverable mail re: various mailings	0.1
01/11/2024	Stephanie Morales	Analyst	Case Administration	Capture and track undeliverable mail images	0.1
<b>Subtotal 01/11/2024</b>					<b>3.4</b>

Date	Employee Name	Role	Task	Description	Hours
01/12/2024	Charles Wheeler	Associate	Case Administration	Administrative review of mailing details	0.1
01/12/2024	Robert Saraceni	Director	Case Administration	Update status tracker and review and respond to corr.	0.8
01/12/2024	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
01/12/2024	Stephanie Morales	Analyst	Case Administration	Sort and manage incoming mail re: various mailings	0.1
<b>Subtotal 01/12/2024</b>					<b>1.1</b>

Date	Employee Name	Role	Task	Description	Hours
01/15/2024	Naomi Rodriguez	Associate	Case Administration	Administrative review of mailing details	0.1
01/15/2024	Staphany Alcantar	Analyst	Claims Administration and Objections	Process, scan, and upload proofs of claim	0.2
01/15/2024	Staphany Alcantar	Associate	Claims Administration and Objections	Input proofs of claim received into case management system	0.2
<b>Subtotal 01/15/2024</b>					<b>0.5</b>

Date	Employee Name	Role	Task	Description	Hours
01/16/2024	Laura Tondreault	Analyst	Case Administration	Prepare and organize general case documents for accuracy and completeness	0.1
01/16/2024	Melissa Membrino	Director	Case Administration	Coordinate address updates per USPS forwarding instructions	0.2
01/16/2024	Pauline Aragon	Associate	Case Administration	Coordinate service re: Investor Letter per USPS forwarding instructions	1.5

Date	Employee Name	Role	Task	Description	Hours
01/16/2024	Robert Saraceni	Director	Case Administration	Review and respond to D. Behrends corr. re [REDACTED] and draft corr. to [REDACTED] re claim.	0.3
01/16/2024	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
01/16/2024	Staphany Alcantar	Analyst	Claims Administration and Objections	Process, scan, and upload proofs of claim	0.2
01/16/2024	Staphany Alcantar	Associate	Claims Administration and Objections	Input proofs of claim received into case management system	0.2
01/16/2024	Stephanie Morales	Analyst	Case Administration	Sort and manage incoming mail re: various mailings	0.1
<b>Subtotal 01/16/2024</b>					<b>2.8</b>

Date	Employee Name	Role	Task	Description	Hours
01/17/2024	Aimee Marshall	Associate	Case Administration	Generate service of Heartland Notice & POC One Off ([REDACTED]) 1.17.24 mailing including printing and fulfillment	0.1
01/17/2024	Aimee Marshall	Associate	Case Administration	Generate service of Heartland Notice + POC One Off Mailing ([REDACTED]) - 1.17.24 mailing including printing and fulfillment	0.1
01/17/2024	Jose Cruz	Associate	Case Administration	Generate service of Heartland Notice & POC One Off ([REDACTED]) 1.17.24 mailing including printing and fulfillment	0.2
01/17/2024	Jose Cruz	Associate	Case Administration	Generate service of Heartland Notice + POC One Off Mailing ([REDACTED]) - 1.17.24 mailing including printing and fulfillment	0.2
01/17/2024	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
01/17/2024	Staphany Alcantar	Analyst	Claims Administration and Objections	Process, scan, and upload proofs of claim	0.2
01/17/2024	Staphany Alcantar	Associate	Claims Administration and Objections	Input proofs of claim received into case management system	0.2
01/17/2024	Stephanie Morales	Analyst	Case Administration	Record and track undeliverable mail re: various mailings	0.1
01/17/2024	Stephanie Morales	Analyst	Case Administration	Capture and track undeliverable mail images	0.1
<b>Subtotal 01/17/2024</b>					<b>1.3</b>

Date	Employee Name	Role	Task	Description	Hours
01/18/2024	Charles Wheeler	Associate	Case Administration	Administrative review of mailing details	0.1
01/18/2024	IT Staff	Senior Associate	Case Administration	Address Updates - 1/18/24	0.3
01/18/2024	Kevin Wasserman	Associate	Case Administration	Creation/Circulation of Claims Report	1.0
01/18/2024	Laura Tondreault	Analyst	Case Administration	Prepare and organize general case documents for accuracy and completeness	0.5
01/18/2024	Naomi Rodriguez	Associate	Case Administration	Administrative review of mailing details	0.4
01/18/2024	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

Date	Employee Name	Role	Task	Description	Hours
01/18/2024	Stephanie Morales	Analyst	Case Administration	Record and track undeliverable mail re: various mailings	0.1
01/18/2024	Stephanie Morales	Analyst	Case Administration	Sort and manage incoming mail re: various mailings	0.1
01/18/2024	Stephanie Morales	Analyst	Case Administration	Capture and track undeliverable mail images	0.1
<b>Subtotal 01/18/2024</b>					<b>2.7</b>

Date	Employee Name	Role	Task	Description	Hours
01/19/2024	Lindsay Litt	Analyst	Case Administration	Sort and manage incoming mail re: various mailings	0.1
01/19/2024	Pauline Aragon	Associate	Case Administration	Coordinate service re: Investor Letter per USPS forwarding instructions	0.5
01/19/2024	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
01/19/2024	Staphany Alcantar	Analyst	Claims Administration and Objections	Process, scan, and upload proofs of claim	0.3
01/19/2024	Staphany Alcantar	Associate	Claims Administration and Objections	Input proofs of claim received into case management system	0.2
01/19/2024	Stephanie Morales	Analyst	Case Administration	Record and track undeliverable mail re: various mailings	0.4
01/19/2024	Stephanie Morales	Analyst	Case Administration	Sort and manage incoming mail re: various mailings	0.1
01/19/2024	Stephanie Morales	Analyst	Case Administration	Capture and track undeliverable mail images	0.4
<b>Subtotal 01/19/2024</b>					<b>2.1</b>

Date	Employee Name	Role	Task	Description	Hours
01/21/2024	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
<b>Subtotal 01/21/2024</b>					<b>0.2</b>

Date	Employee Name	Role	Task	Description	Hours
01/22/2024	Lindsay Litt	Analyst	Case Administration	Sort and manage incoming mail re: various mailings	0.1
01/22/2024	Pauline Aragon	Associate	Case Administration	Coordinate service re: Investor Letter per USPS forwarding instructions	0.5
01/22/2024	Robert Saraceni	Director	Case Administration	Finalize [REDACTED] supporting documents and draft corr. to D. Behrends.	0.3
01/22/2024	Robert Saraceni	Director	Case Administration	Review corr. and prepare notice and claim form for [REDACTED] as requested. Email [REDACTED]	0.2
01/22/2024	Robert Saraceni	Director	Case Administration	Prepare and email [REDACTED] notice and claim form.	0.1
01/22/2024	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
01/22/2024	Staphany Alcantar	Analyst	Claims Administration and Objections	Process, scan, and upload proofs of claim	0.3

Date	Employee Name	Role	Task	Description	Hours
01/22/2024	Staphany Alcantar	Associate	Claims Administration and Objections	Input proofs of claim received into case management system	0.4
01/22/2024	Staphany Alcantar	Analyst	Case Administration	Case file case related documents	0.3
01/22/2024	Stephanie Morales	Analyst	Case Administration	Record and track undeliverable mail re: various mailings	0.1
01/22/2024	Stephanie Morales	Analyst	Case Administration	Capture and track undeliverable mail images	0.1
01/22/2024	Stephanie Morales	Analyst	Case Administration	Sort and manage incoming mail re: various mailings	0.1
<b>Subtotal 01/22/2024</b>					<b>2.6</b>

Date	Employee Name	Role	Task	Description	Hours
01/23/2024	Kevin Wasserman	Associate	Case Administration	Call with accounting firm.	0.5
01/23/2024	Laura Tondreault	Analyst	Case Administration	Prepare and organize general case documents for accuracy and completeness	0.8
01/23/2024	Robert Saraceni	Director	Case Administration	Review request form D. Behrends to retrieve and send POC Forms for 7 investors requested by counsel, forward forms.	0.4
01/23/2024	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
01/23/2024	Staphany Alcantar	Analyst	Claims Administration and Objections	Process, scan, and upload proofs of claim	0.4
01/23/2024	Staphany Alcantar	Associate	Claims Administration and Objections	Input proofs of claim received into case management system	0.3
<b>Subtotal 01/23/2024</b>					<b>2.5</b>

Date	Employee Name	Role	Task	Description	Hours
01/24/2024	Laura Tondreault	Analyst	Case Administration	Prepare and organize general case documents for accuracy and completeness	0.1
01/24/2024	Lindsay Litt	Analyst	Case Administration	Sort and manage incoming mail re: various mailings	0.1
01/24/2024	Pauline Aragon	Analyst	Case Administration	Sort and manage incoming mail re: various mailings	0.1
<b>Subtotal 01/24/2024</b>					<b>0.3</b>

Date	Employee Name	Role	Task	Description	Hours
01/25/2024	Kevin Wasserman	Associate	Case Administration	Creation/Circulation of Claims Report. Adding transaction amounts to claim report per conversation with accounting firm.	1.5
01/25/2024	Laura Tondreault	Analyst	Case Administration	Prepare and organize general case documents for accuracy and completeness	0.2
01/25/2024	Monica Arellano	Associate	Case Administration	Coordinate service re: various docket nos. per USPS forwarding instructions	0.1
01/25/2024	Robert Saraceni	Director	Case Administration	Retrieve and email notice and claim form for [REDACTED], as requested by Receiver.	0.1
01/25/2024	Robert Saraceni	Director	Case Administration	Review D. Behrends Corr. re [REDACTED] notice and claim. Pull claim documents and provide to D. Behrends	0.1

Date	Employee Name	Role	Task	Description	Hours
01/25/2024	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
01/25/2024	Staphany Alcantar	Analyst	Claims Administration and Objections	Process, scan, and upload proofs of claim	0.2
01/25/2024	Staphany Alcantar	Associate	Claims Administration and Objections	Input proofs of claim received into case management system	0.2
01/25/2024	Stephanie Morales	Analyst	Case Administration	Record and track undeliverable mail re: various mailings	0.1
01/25/2024	Stephanie Morales	Analyst	Case Administration	Capture and track undeliverable mail images	0.1
<b>Subtotal 01/25/2024</b>					<b>2.7</b>

Date	Employee Name	Role	Task	Description	Hours
01/26/2024	Aimee Marshall	Associate	Case Administration	Generate service of Heartland POC + Notice Mailing One Off 1.26.24 mailing including printing and fulfillment	0.1
01/26/2024	Alberto Chachagua	Associate	Case Administration	Generate service of Heartland POC + Notice Mailing One Off 1.26.24 mailing including printing and fulfillment	0.1
01/26/2024	Daniel Ramirez	Associate	Case Administration	One-off mailing for POC and Notice 1.26.24	0.6
01/26/2024	Jose Cruz	Associate	Case Administration	Generate service of Heartland POC + Notice Mailing One Off 1.26.24 mailing including printing and fulfillment	0.1
01/26/2024	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
01/26/2024	Staphany Alcantar	Analyst	Claims Administration and Objections	Process, scan, and upload proofs of claim	0.4
01/26/2024	Staphany Alcantar	Associate	Claims Administration and Objections	Input proofs of claim received into case management system	0.3
<b>Subtotal 01/26/2024</b>					<b>1.7</b>

Date	Employee Name	Role	Task	Description	Hours
01/29/2024	Aimee Marshall	Associate	Case Administration	Generate service of Heartland Notice + POC Mailing (██████████) One Off 1.29.24 mailing including printing and fulfillment	0.1
01/29/2024	Aimee Marshall	Associate	Case Administration	Generate service of Heartland Notice + POC Mailing (██████████) One Off 1.29.24 mailing including printing and fulfillment	0.1
01/29/2024	Alberto Chachagua	Associate	Case Administration	Generate service of Heartland Notice + POC Mailing (██████████) One Off 1.29.24 mailing including printing and fulfillment	0.2
01/29/2024	Alberto Chachagua	Associate	Case Administration	Generate service of Heartland Notice + POC Mailing (██████████) One Off 1.29.24 mailing including printing and fulfillment	0.2
01/29/2024	Charles Wheeler	Associate	Case Administration	Administrative review of mailing details	0.1
01/29/2024	Keny Contreras	Analyst	Claims Administration and Objections	Process, scan, and upload proofs of claim	0.3
01/29/2024	Keny Contreras	Associate	Claims Administration and Objections	Input proofs of claim received into case management system	0.3



Date	Employee Name	Role	Task	Description	Hours
01/29/2024	Laura Tondreault	Analyst	Case Administration	Prepare and organize general case documents for accuracy and completeness	0.4
01/29/2024	Naomi Rodriguez	Associate	Case Administration	Administrative review of mailing details	0.2
01/29/2024	Pauline Aragon	Associate	Case Administration	Coordinate service re: Investor Notice per USPS forwarding instructions	0.5
01/29/2024	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
01/29/2024	Stephanie Morales	Analyst	Case Administration	Sort and manage incoming mail re: various mailings	0.1
<b>Subtotal 01/29/2024</b>					<b>2.6</b>

Date	Employee Name	Role	Task	Description	Hours
01/30/2024	Aimee Marshall	Associate	Case Administration	Generate service of Heartland POC + Notice Mailing One Off 1.30.24 mailing including printing and fulfillment	0.1
01/30/2024	Alberto Chachagua	Associate	Case Administration	Generate service of Heartland POC + Notice Mailing One Off 1.30.24 mailing including printing and fulfillment	0.2
01/30/2024	Charles Wheeler	Associate	Case Administration	Administrative review of mailing details	0.1
01/30/2024	Laura Tondreault	Analyst	Case Administration	Prepare and organize general case documents for accuracy and completeness	0.2
01/30/2024	Naomi Rodriguez	Associate	Case Administration	Administrative review of mailing details	0.4
01/30/2024	Robert Saraceni	Director	Case Administration	Review incoming corr. from ██████████, pull original notice and set up remail.	0.3
01/30/2024	Robert Saraceni	Director	Case Administration	Review request from D. Behrends for notice and claim to be sent to ██████████, research and resend (.2); review ██████████ and format to comply with ██████████ (.4)	0.6
01/30/2024	Robert Saraceni	Director	Case Administration	Review request for ██████████ claim form to be emailed and confirm with D. Behrends.	0.2
01/30/2024	Robert Saraceni	Director	Case Administration	Review and respond to ██████████ request to email only claim pages and not notice. Extract claim pages and resend.	0.2
01/30/2024	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
01/30/2024	Staphany Alcantar	Analyst	Claims Administration and Objections	Process, scan, and upload proofs of claim	0.2
01/30/2024	Staphany Alcantar	Associate	Claims Administration and Objections	Input proofs of claim received into case management system	0.2
<b>Subtotal 01/30/2024</b>					<b>2.8</b>

Date	Employee Name	Role	Task	Description	Hours
01/31/2024	Casandra Segura	Analyst	Case Administration	Scan general case related documents	0.1
01/31/2024	Charles Wheeler	Associate	Case Administration	Administrative review of mailing details	0.1
01/31/2024	IT Staff	Senior Associate	Case Administration	Address Updates 1/31/24	0.3
01/31/2024	Laura Tondreault	Analyst	Case Administration	Prepare and organize general case documents for accuracy and completeness	0.5

Date	Employee Name	Role	Task	Description	Hours
01/31/2024	Robert Saraceni	Director	Case Administration	Review corr. from D. Behrends re non-investor creditor, ██████████ (.1); Process address updates (.3); review open corr.	0.7
01/31/2024	Robert Saraceni	Director	Case Administration	TC with ██████████ re claim forms for her ██████████ to file a claim	0.1
01/31/2024	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
01/31/2024	Staphany Alcantar	Analyst	Claims Administration and Objections	Process proofs of claim received for scanning into case management system	0.3
01/31/2024	Staphany Alcantar	Associate	Claims Administration and Objections	Input proofs of claim received into case management system	0.2
01/31/2024	Stephanie Morales	Analyst	Case Administration	Sort and manage incoming mail re: various mailings	0.1
01/31/2024	Stephanie Morales	Analyst	Case Administration	Record and track undeliverable mail re: various mailings	0.1
01/31/2024	Stephanie Morales	Analyst	Case Administration	Capture and track undeliverable mail images	0.1
<b>Subtotal 01/31/2024</b>					<b>2.7</b>
<b>Total 01/01/2024 - 01/31/2024</b>					<b>55.5</b>



**Noticing Detail**

Date of Service	Document(s) or Mailing Description	Number of Recipients	Method(s) of Service
1/2/2024	Heartland Notice + POC One Off Mailing – 1.2.24	1	First Class Mail
1/4/2024	Investor Letter Mailing (USPS FORWARD)	11	First Class Mail
1/4/2024	Investor Notice (USPS FORWARD)	2	First Class Mail
1/11/2024	Heartland POC + Notice Mailing One Off 1.11.24	1	First Class Mail
1/17/2024	Heartland Notice & POC One Off (████████) 1.17.24	1	First Class Mail
1/17/2024	Heartland Notice + POC One Off Mailing (████████) – 1.17.24	1	First Class Mail
1/25/2024	Investor Letter Mailing (USPS FORWARD)	7	First Class Mail
1/25/2024	POC + Notice Mailing Feeder Funds (USPS FORWARD)	2	First Class Mail
1/26/2024	Heartland POC + Notice Mailing One Off 1.26.24	1	First Class Mail
1/29/2024	Heartland Notice + POC Mailing (████████) One Off 1.29.24	1	First Class Mail
1/29/2024	Heartland Notice + POC Mailing (████████) One Off 1.29.24	1	First Class Mail
1/30/2024	Heartland POC + Notice Mailing One Off 1.30.24	2	First Class Mail



410 Exchange, Ste 100  
 Irvine, CA 92602  
 855.812.6112

**Invoice:** 10758  
**Date:** 03/02/2024  
**Due Date:** 04/01/2024  
**Terms:** Net 30

**Bill To:**  
 Heartland

Item	Quantity	Unit Price	Amount
February 2024 Invoice			
Hourly Fees			\$10,970.50
Printing	2	\$0.10	\$0.20
Postage			\$3.26
Envelopes and Packaging – See Noticing Summary for details			\$0.30

<b>TOTAL DUE</b>	\$10,974.26
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THANK YOU.

<b>TOTAL ACCOUNT BALANCE DUE</b>	\$127,549.09
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**For wire/ACH payments:**

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

**Remit Check Payments to:**

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



**Case Name:** Heartland

## Summary of Hourly Fees

**Date Range:** 02/01/2024 - 02/29/2024

<b>Role</b>	<b>Hours</b>	<b>Rate</b>	<b>Total</b>
Analyst I	0.7	\$30.00	\$21.00
Analyst II	6.6	\$40.00	\$264.00
Analyst III	1.5	\$50.00	\$75.00
Associate I	1.1	\$65.00	\$71.50
Associate II	0.8	\$97.50	\$78.00
Associate III	18.0	\$130.00	\$2,340.00
Director	31.8	\$185.00	\$5,883.00
Managing Director	3.9	\$210.00	\$819.00
Senior Associate	8.6	\$165.00	\$1,419.00
		<b>Total</b>	<b>\$10,970.50</b>



**Case Name:** Heartland

## Time Detail

**Date Range:** 02/01/2024 - 02/29/2024

Date	Employee Name	Role	Task	Description	Hours
02/01/2024	Daniel Ramirez	Associate	Case Administration	POC + Notice Mailing (One-Off) 1.31.24	0.6
02/01/2024	Jessie De Guzman	Senior Associate	Case Administration	Respond to inquiry via phone re: General information	0.1
02/01/2024	Kevin Wasserman	Associate	Case Administration	Creation of claims register.	1.3
02/01/2024	Laura Tondreault	Analyst	Case Administration	Prepare and organize general case documents for accuracy and completeness	0.2
02/01/2024	Monica Arellano	Associate	Case Administration	Coordinate service re: various docket nos. per USPS forwarding instructions	0.1
02/01/2024	Robert Saraceni	Director	Case Administration	Review and respond to email from [REDACTED] inquiry (.1); research and find claim filed by [REDACTED] in the name of account holder [REDACTED] (.3); TC to [REDACTED] to discuss claim status (.2); Review corr. received from [REDACTED], [REDACTED] and [REDACTED] disputing claims (.1); corr. to D. Behrends re same (.1); Retrieve original claims and notices for all three investors and draft email advising each to file appropriate claim by deadline (.2)	1.0
02/01/2024	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
02/01/2024	Staphany Alcantar	Analyst	Case Administration	Correspondence with Stretto team re: processing correspondence	0.1
02/01/2024	Staphany Alcantar	Analyst	Claims Administration and Objections	Process, scan, and upload proofs of claim	0.2
02/01/2024	Staphany Alcantar	Associate	Claims Administration and Objections	Input proofs of claim received into case management system	0.2
02/01/2024	Staphany Alcantar	Analyst	Case Administration	Case file case related documents	0.3
<b>Subtotal 02/01/2024</b>					<b>4.3</b>
Date	Employee Name	Role	Task	Description	Hours
02/02/2024	Dan McElhinney	Managing Director	Claims Administration and Objections	Prep email to [REDACTED] and team re post-bar date task / issues list (.3)	0.3
02/02/2024	Daniel Ramirez	Associate	Case Administration	Compile and input POCs and supporting detail into Box folders for those too large to be uploaded	1.5
02/02/2024	Kevin Wasserman	Associate	Case Administration	Internal Call	1.0
02/02/2024	Kevin Wasserman	Associate	Case Administration	Correspondence with investor.	0.4
02/02/2024	Robert Saraceni	Director	Case Administration	Tc with Investor, [REDACTED] to confirm claim receipt.	0.1

Date	Employee Name	Role	Task	Description	Hours
02/02/2024	Robert Saraceni	Director	Case Administration	Review and respond to corr. regarding confirmation of claim filed by ██████ and corr. with California operations staff to confirm receipt of claim.	0.2
02/02/2024	Robert Saraceni	Director	Case Administration	Review corr. re attachments to claim of ██████, research to determine if claim was filed and respond to D. Behrends	0.2
02/02/2024	Robert Saraceni	Director	Case Administration	Periodic review of new claims filed for claim of ██████	0.1
02/02/2024	Robert Saraceni	Director	Case Administration	Review correspondence forwarded from operations and draft response, forward proposed response to D. Behrends for review (.3); draft corr. to claimants and advise that correspondence filed does not constitute a claim and advise that they must file claims (.2)	0.5
02/02/2024	Robert Saraceni	Director	Case Administration	Follow up on ██████ claim submission	0.1
02/02/2024	Robert Saraceni	Director	Case Administration	Review corr. form ██████ and upload supporting documents supplied to claim data.	0.4
02/02/2024	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
02/02/2024	Staphany Alcantar	Analyst	Case Administration	Correspondence with Stretto team re: processing correspondence	0.1
02/02/2024	Staphany Alcantar	Analyst	Claims Administration and Objections	Process, scan, and upload proofs of claim	0.4
02/02/2024	Staphany Alcantar	Associate	Claims Administration and Objections	Input proofs of claim received into case management system	0.3
02/02/2024	Stephanie Delgado	Associate	Case Administration	Manage and oversee organization of general case documents for accuracy and completeness	0.4
02/02/2024	Stephanie Morales	Analyst	Case Administration	Prepare and organize general case documents for accuracy and completeness	0.1
<b>Subtotal 02/02/2024</b>					<b>6.4</b>

Date	Employee Name	Role	Task	Description	Hours
02/05/2024	Dan McElhinney	Managing Director	Claims Administration and Objections	Cons. team re bar date (.3); email D. Ramirez re data entry questions (.2); prep for and attend call with ██████ and team re post-bar date task / issues list (.7)	1.2
02/05/2024	Daniel Ramirez	Associate	Case Administration	Reviewing filed claims by data entry and intake team for accuracy and correctness	1.9
02/05/2024	Daniel Ramirez	Associate	Case Administration	Reviewing filed claims by data entry and intake team for accuracy and correctness	1.6
02/05/2024	Daniel Ramirez	Associate	Case Administration	Meeting with ThinkLogic regarding next steps	0.5
02/05/2024	IT Staff	Senior Associate	Case Administration	Project Management - Meeting with Stretto team for bar date reporting	1.0
02/05/2024	IT Staff	Senior Associate	Case Administration	Address Updates	1.8
02/05/2024	IT Staff	Senior Associate	Case Administration	Address Updates 2/5/24	1.8
02/05/2024	IT Staff	Senior Associate	Case Administration	Heartland -%u00D83D%u00DD01 RECURRING - Address Updates	2.0
02/05/2024	Keny Contreras	Analyst	Claims Administration and Objections	Process, scan, and upload proofs of claim	0.4

Date	Employee Name	Role	Task	Description	Hours
02/05/2024	Keny Contreras	Associate	Claims Administration and Objections	Input proofs of claim received into case management system	0.5
02/05/2024	Kevin Wasserman	Associate	Case Administration	Call regarding post bar date discussion.	1.0
02/05/2024	Kevin Wasserman	Associate	Case Administration	Circulation of POC to receiver and counsel.	0.5
02/05/2024	Laura Tondreault	Analyst	Case Administration	Prepare and organize general case documents for accuracy and completeness	0.7
02/05/2024	Robert Saraceni	Director	Case Administration	Corr. to D. McElhinney on upcoming bar date and action plan.	0.1
02/05/2024	Robert Saraceni	Director	Case Administration	Review and request address updates (.4); update status tracker (.3)	0.7
02/05/2024	Robert Saraceni	Director	Case Administration	Draft corr. to Receiver's office re: Bar Date items to be addressed	0.2
02/05/2024	Robert Saraceni	Director	Case Administration	Continue review of claims register	0.4
02/05/2024	Robert Saraceni	Director	Case Administration	Continue review of filed claims	0.4
02/05/2024	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
02/05/2024	Staphany Alcantar	Analyst	Case Administration	Case file case related documents	0.3
02/05/2024	Staphany Alcantar	Analyst	Claims Administration and Objections	Waiting for hand delivery claims	3.0
<b>Subtotal 02/05/2024</b>					<b>20.4</b>

Date	Employee Name	Role	Task	Description	Hours
02/06/2024	IT Staff	Senior Associate	Case Administration	Provide steps for daniel to use Cello	0.8
02/06/2024	Keny Contreras	Analyst	Claims Administration and Objections	Process, scan, and upload proofs of claim	0.2
02/06/2024	Keny Contreras	Associate	Claims Administration and Objections	Input proofs of claim received into case management system	0.2
02/06/2024	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
<b>Subtotal 02/06/2024</b>					<b>1.3</b>

Date	Employee Name	Role	Task	Description	Hours
02/07/2024	Daniel Ramirez	Associate	Case Administration	Reviewing filed claims by ThinkLogic and intake team for accuracy and correctness	1.0
02/07/2024	IT Staff	Senior Associate	Case Administration	Address Updates	0.5
02/07/2024	Jacob Ingram	Associate	Case Administration	Administrative review of mailing details	0.1
02/07/2024	Kevin Wasserman	Associate	Case Administration	Internal circulation of claims report. With edits added.	1.5
02/07/2024	Laura Tondreault	Analyst	Case Administration	Prepare and organize general case documents for accuracy and completeness	0.3



Date	Employee Name	Role	Task	Description	Hours
02/07/2024	Robert Saraceni	Director	Case Administration	Respond to ██████ request for confirmation of receipt of claim.	0.1
02/07/2024	Robert Saraceni	Director	Case Administration	Review and update 2.7.2024 claims register	0.9
02/07/2024	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
02/07/2024	Stephanie Morales	Analyst	Case Administration	Record and track undeliverable mail re: various mailings	0.1
02/07/2024	Stephanie Morales	Analyst	Case Administration	Capture and track undeliverable mail images	0.1
<b>Subtotal 02/07/2024</b>					<b>4.8</b>

Date	Employee Name	Role	Task	Description	Hours
02/08/2024	Robert Saraceni	Director	Case Administration	Review Claims Register as of Bar Date and edit, notate potential issue. Forward to Receiver	3.9
02/08/2024	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
<b>Subtotal 02/08/2024</b>					<b>4.1</b>

Date	Employee Name	Role	Task	Description	Hours
02/12/2024	Robert Saraceni	Director	Case Administration	Review and respond to D. Behrends inquiry re governmental agencies served with non-investor creditor notice and claim form.	0.2
<b>Subtotal 02/12/2024</b>					<b>0.2</b>

Date	Employee Name	Role	Task	Description	Hours
02/13/2024	Robert Saraceni	Director	Case Administration	Review, research and forward Fourth quarter Stretto Bios to D. Behrends as requested. (.2); process address update for ██████ (.1); continue claim register review (.4)	0.7
02/13/2024	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
02/13/2024	Stephanie Morales	Analyst	Case Administration	Sort and manage incoming mail re: various mailings	0.1
02/13/2024	Stephanie Morales	Analyst	Case Administration	Record and track undeliverable mail re: various mailings	0.1
02/13/2024	Stephanie Morales	Analyst	Case Administration	Capture and track undeliverable mail images	0.1
<b>Subtotal 02/13/2024</b>					<b>1.1</b>

Date	Employee Name	Role	Task	Description	Hours
02/14/2024	Kevin Wasserman	Associate	Case Administration	Internal call to go over future of receivership cases.	0.5
02/14/2024	Robert Saraceni	Director	Case Administration	Review, research and respond to ██████ inquiry.	0.3
<b>Subtotal 02/14/2024</b>					<b>0.8</b>

Date	Employee Name	Role	Task	Description	Hours
02/15/2024	Kevin Wasserman	Associate	Case Administration	Internal circulation of claims report with edits.	1.1

Date	Employee Name	Role	Task	Description	Hours
02/15/2024	Robert Saraceni	Director	Claims Administration and Objections	Review claims and claims register	4.4
02/15/2024	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
02/15/2024	Staphany Alcantar	Analyst	Case Administration	Case file case related documents	0.3
<b>Subtotal 02/15/2024</b>					<b>6.0</b>

Date	Employee Name	Role	Task	Description	Hours
02/19/2024	Robert Saraceni	Director	Case Administration	Full review of address changes and export of database addresses	2.6
02/19/2024	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
<b>Subtotal 02/19/2024</b>					<b>2.7</b>

Date	Employee Name	Role	Task	Description	Hours
02/20/2024	IT Staff	Senior Associate	Case Administration	Address Updates 2/20/2024	0.3
02/20/2024	IT Staff	Senior Associate	Case Administration	Project Management	0.3
<b>Subtotal 02/20/2024</b>					<b>0.6</b>

Date	Employee Name	Role	Task	Description	Hours
02/21/2024	Robert Saraceni	Director	Case Administration	Claims Reconciliation	1.6
02/21/2024	Robert Saraceni	Director	Case Administration	Corr. with D. Behrends re disclaimer on distribution checks.	0.1
02/21/2024	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
02/21/2024	Staphany Alcantar	Analyst	Claims Administration and Objections	Process, scan, and upload proofs of claim	0.2
02/21/2024	Staphany Alcantar	Associate	Claims Administration and Objections	Input proofs of claim received into case management system	0.1
<b>Subtotal 02/21/2024</b>					<b>2.1</b>

Date	Employee Name	Role	Task	Description	Hours
02/22/2024	Kevin Wasserman	Associate	Case Administration	Circulation of claims register & updates.	1.2
02/22/2024	Laura Tondreault	Analyst	Case Administration	Prepare and organize general case documents for accuracy and completeness	0.2
02/22/2024	Robert Saraceni	Director	Case Administration	Claims Reconciliation	7.8
02/22/2024	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
<b>Subtotal 02/22/2024</b>					<b>9.5</b>

Date	Employee Name	Role	Task	Description	Hours
02/23/2024	Robert Saraceni	Director	Case Administration	Corr. re additional legend on distribution check (.1); draft corr. and prepare summary for 2.23.2024 claims report (.4)	0.5
02/23/2024	Stephanie Morales	Analyst	Case Administration	Sort and manage incoming mail re: various mailings	0.1
02/23/2024	Stephanie Morales	Analyst	Case Administration	Record and track undeliverable mail re: various mailings	0.1
02/23/2024	Stephanie Morales	Analyst	Case Administration	Capture and track undeliverable mail images	0.1
<b>Subtotal 02/23/2024</b>					<b>0.8</b>

Date	Employee Name	Role	Task	Description	Hours
02/26/2024	Monica Arellano	Analyst	Case Administration	Prepare and organize general case documents for accuracy and completeness	0.1
02/26/2024	Robert Saraceni	Director	Case Administration	Retrieve and verify all transaction schedules, forward to D. Behrends, upload to Box.	0.4
02/26/2024	Stephanie Morales	Analyst	Case Administration	Record and track undeliverable mail re: various mailings	0.1
02/26/2024	Stephanie Morales	Analyst	Case Administration	Capture and track undeliverable mail images	0.1
<b>Subtotal 02/26/2024</b>					<b>0.7</b>

Date	Employee Name	Role	Task	Description	Hours
02/27/2024	Keny Contreras	Associate	Claims Administration and Objections	Review duplicate proofs of claim for accuracy and completeness	0.2
02/27/2024	Robert Saraceni	Director	Case Administration	Review and respond to [REDACTED] status inquiry	0.1
02/27/2024	Robert Saraceni	Director	Case Administration	Review request from D. Behrends to create new transaction schedules and add them to Box as supporting documentation. Work with IT staff to create transaction schedules, split files and rename schedules, review and verify information and upload individual files and attach to claims located in Box. Draft corr. to D. Behrends and forward complete files.	1.6
02/27/2024	Staphany Alcantar	Analyst	Claims Administration and Objections	Process, scan, and upload proofs of claim	0.3
02/27/2024	Staphany Alcantar	Associate	Claims Administration and Objections	Input proofs of claim received into case management system	0.2
02/27/2024	Stephanie Delgado	Associate	Case Administration	Manage and oversee organization of general case documents for accuracy and completeness	0.5
02/27/2024	Stephanie Morales	Analyst	Case Administration	Prepare and organize general case documents for accuracy and completeness	0.1
<b>Subtotal 02/27/2024</b>					<b>3.0</b>

Date	Employee Name	Role	Task	Description	Hours
02/28/2024	Kevin Wasserman	Associate	Case Administration	Creation of claims register.	1.5
02/28/2024	Laura Tondreault	Analyst	Case Administration	Prepare and organize general case documents for accuracy and completeness	0.1
02/28/2024	Robert Saraceni	Director	Case Administration	Review D. Behrends corr. regarding separating [REDACTED] Transaction Schedule. Split schedule and forward.	0.3

Date	Employee Name	Role	Task	Description	Hours
02/28/2024	Robert Saraceni	Director	Case Administration	Prepare claims register.	0.3
02/28/2024	Robert Saraceni	Director	Claims Administration and Objections	Corr. regarding [REDACTED] and [REDACTED] claims, review Box files	0.2
02/28/2024	Robert Saraceni	Director	Case Administration	Upload additional documentation to [REDACTED] Claim [REDACTED]	0.1
02/28/2024	Robert Saraceni	Director	Case Administration	Upload additional documentation to [REDACTED] Claim [REDACTED] (.1); Corr related to [REDACTED] transaction schedule revision (.2)	0.3
02/28/2024	Robert Saraceni	Director	Case Administration	Review corr. from C. Bremer and revised [REDACTED] schedule. Forward to IT for transaction schedule to be prepped.	0.1
02/28/2024	Robert Saraceni	Director	Case Administration	Corr. with K. Streseman re revised [REDACTED] transaction schedule, provide template and review final version, forward to D. Behrends.	0.3
02/28/2024	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
<b>Subtotal 02/28/2024</b>					<b>3.4</b>

Date	Employee Name	Role	Task	Description	Hours
02/29/2024	Robert Saraceni	Director	Case Administration	Review request to upload [REDACTED] Known Investor Disputed Claim Election Form and upload to Box.	0.1
02/29/2024	Robert Saraceni	Director	Case Administration	Upload Receiver's Response to [REDACTED] Proof of Claim to Box claim file as requested. Confirm procedures going forward.	0.2
02/29/2024	Robert Saraceni	Director	Claims Administration and Objections	Update and forward current claims register to Dykema and A&C.	0.3
02/29/2024	Stephanie Morales	Analyst	Case Administration	Record and track undeliverable mail re: various mailings	0.1
02/29/2024	Stephanie Morales	Analyst	Case Administration	Capture and track undeliverable mail images	0.1
<b>Subtotal 02/29/2024</b>					<b>0.8</b>

**Total 02/01/2024 - 02/29/2024 73.0**



**Noticing Detail**

<b>Date of Service</b>	<b>Document(s) or Mailing Description</b>	<b>Number of Recipients</b>	<b>Method(s) of Service</b>
2/1/2024	Various Mailings (USPS FORWARD)	2	First Class Mail



410 Exchange, Ste 100  
Irvine, CA 92602  
855.812.6112

**Invoice:** 11014  
**Date:** 04/02/2024  
**Due Date:** 05/02/2024  
**Terms:** Net 30

**Bill To:**  
Heartland

Item	Quantity	Unit Price	Amount
March 2024 Invoice			
Hourly Fees			\$9,496.75

<b>TOTAL DUE</b>	\$9,496.75
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THANK YOU.

<b>TOTAL ACCOUNT BALANCE DUE</b>	\$26,929.05
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**For wire/ACH payments:**

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

**Remit Check Payments to:**

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



**Case Name:** Heartland

## Summary of Hourly Fees

**Date Range:** 03/01/2024 - 03/31/2024

<b>Role</b>	<b>Hours</b>	<b>Rate</b>	<b>Total</b>
Analyst I	0.1	\$30.00	\$3.00
Analyst II	0.2	\$40.00	\$8.00
Analyst III	0.6	\$50.00	\$30.00
Associate II	0.1	\$97.50	\$9.75
Associate III	7.3	\$130.00	\$949.00
Director II	42.2	\$185.00	\$7,807.00
Director III	0.2	\$195.00	\$39.00
Managing Director	3.1	\$210.00	\$651.00
		<b>Total</b>	<b>\$9,496.75</b>



**Case Name:** Heartland

## Time Detail

**Date Range:** 03/01/2024 - 03/31/2024

Date	Employee Name	Role	Task	Description	Hours
03/01/2024	Kevin Streseman	Director	Case Administration	Create transaction schedules	1.7
03/01/2024	Kevin Streseman	Director	Case Administration	Create additional transaction schedules	0.8
03/01/2024	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
<b>Subtotal 03/01/2024</b>					<b>2.6</b>

Date	Employee Name	Role	Task	Description	Hours
03/04/2024	Laura Tondreault	Analyst	Case Administration	Prepare and organize general case documents for accuracy and completeness	0.1
<b>Subtotal 03/04/2024</b>					<b>0.1</b>

Date	Employee Name	Role	Task	Description	Hours
03/05/2024	Robert Saraceni	Director	Case Administration	Research and provide Daniel Behrends Attorney addresses for Investors and Non-Investor Creditors (.5);	0.5
03/05/2024	Robert Saraceni	Director	Claims Administration and Objections	Review correspondence and upload response letters for [REDACTED]	1.5
03/05/2024	Robert Saraceni	Director	Claims Administration and Objections	Update claims register	0.7
03/05/2024	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
<b>Subtotal 03/05/2024</b>					<b>2.8</b>

Date	Employee Name	Role	Task	Description	Hours
03/06/2024	Robert Saraceni	Director	Case Administration	TC with [REDACTED] regarding case status	0.3
03/06/2024	Robert Saraceni	Director	Case Administration	Perform address update review	0.6
<b>Subtotal 03/06/2024</b>					<b>0.9</b>

Date	Employee Name	Role	Task	Description	Hours
03/07/2024	Robert Saraceni	Director	Case Administration	Review and audit address updates	0.5
03/07/2024	Robert Saraceni	Director	Case Administration	Review correspondence and upload response land consent letters for [REDACTED] and [REDACTED]	0.7



Date	Employee Name	Role	Task	Description	Hours
03/07/2024	Robert Saraceni	Director	Case Administration	Update attorney list (.1); Review address updates (.2); Forward 3.7.2024 register to client (.1) prepare claim and address reconciliation report (.5)	0.9
03/07/2024	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
<b>Subtotal 03/07/2024</b>					<b>2.2</b>

Date	Employee Name	Role	Task	Description	Hours
03/08/2024	Laura Tondreault	Analyst	Case Administration	Prepare and organize general case documents for accuracy and completeness	0.1
03/08/2024	Robert Saraceni	Director	Case Administration	Finalize and forward 3/07/2024 claim register to Dykema and A&C.	0.1
03/08/2024	Robert Saraceni	Director	Case Administration	Review corr. from D. Behrends and upload election forms for [REDACTED] and [REDACTED] to Box folders.	0.3
03/08/2024	Robert Saraceni	Director	Case Administration	Review email request from D. Behrends and upload [REDACTED] Election Form to Box folder	0.1
<b>Subtotal 03/08/2024</b>					<b>0.6</b>

Date	Employee Name	Role	Task	Description	Hours
03/11/2024	Robert Saraceni	Director	Case Administration	Add [REDACTED] consent form to Box, upload Receiver's response to [REDACTED] claim to Box, upload [REDACTED] consent form to Box	0.2
03/11/2024	Robert Saraceni	Director	Claims Administration and Objections	Provide updated Investor counsel list as requested by D. Behrends	0.1
03/11/2024	Robert Saraceni	Director	Case Administration	Review new claims filed - [REDACTED] and [REDACTED]	0.3
<b>Subtotal 03/11/2024</b>					<b>0.6</b>

Date	Employee Name	Role	Task	Description	Hours
03/12/2024	Kevin Wasserman	Associate	Case Administration	Correspondence with counsel / receiver.	1.4
03/12/2024	Robert Saraceni	Director	Claims Administration and Objections	Update claims register, review and categorize all late-filed, duplicate and test claims	0.8
03/12/2024	Robert Saraceni	Director	Claims Administration and Objections	Review and upload Receiver's Response Letters to [REDACTED] and [REDACTED]	0.3
03/12/2024	Robert Saraceni	Director	Case Administration	TC with [REDACTED], Investor	0.7
03/12/2024	Robert Saraceni	Director	Claims Administration and Objections	Review and upload Receiver's Response Letter to [REDACTED]	0.1
03/12/2024	Robert Saraceni	Director	Claims Administration and Objections	Review and upload Receiver's Response Letter to [REDACTED]	1.5
03/12/2024	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
<b>Subtotal 03/12/2024</b>					<b>5.0</b>

Date	Employee Name	Role	Task	Description	Hours
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Date	Employee Name	Role	Task	Description	Hours
03/13/2024	Kevin Wasserman	Associate	Case Administration	Correspondence with counsel - response to investors.	1.6
03/13/2024	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
<b>Subtotal 03/13/2024</b>					<b>1.7</b>

Date	Employee Name	Role	Task	Description	Hours
03/14/2024	Kevin Wasserman	Associate	Claims Administration and Objections	Circulation of claims register.	0.5
03/14/2024	Kevin Wasserman	Associate	Case Administration	Correspondence with counsel.	1.2
03/14/2024	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
<b>Subtotal 03/14/2024</b>					<b>1.8</b>

Date	Employee Name	Role	Task	Description	Hours
03/18/2024	Aileen Daversa	Director	Case Administration	Participate on conference call with Stretto team re case status	0.2
<b>Subtotal 03/18/2024</b>					<b>0.2</b>

Date	Employee Name	Role	Task	Description	Hours
03/19/2024	Dan McElhinney	Managing Director	Case Administration	Prep and attend hearing re Stretto (1.0)	1.0
03/19/2024	Kevin Wasserman	Associate	Case Administration	Correspondence with counsel.	1.3
03/19/2024	Robert Saraceni	Director	Claims Administration and Objections	Review response and consent letters, update data and review uploads.	7.0
03/19/2024	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
03/19/2024	Staphany Alcantar	Analyst	Claims Administration and Objections	Process, scan, and upload proofs of claim	0.2
03/19/2024	Staphany Alcantar	Associate	Claims Administration and Objections	Input proofs of claim received into case management system	0.1
<b>Subtotal 03/19/2024</b>					<b>9.9</b>

Date	Employee Name	Role	Task	Description	Hours
03/20/2024	Kevin Streseman	Director	Case Administration	Create transaction schedules	0.6
03/20/2024	Kevin Wasserman	Associate	Case Administration	Creation of schedules for counsel.	0.8
03/20/2024	Kevin Wasserman	Associate	Case Administration	Correspondence with counsel.	0.3
03/20/2024	Laura Tondreault	Analyst	Case Administration	Prepare and organize general case documents for accuracy and completeness	0.3

Date	Employee Name	Role	Task	Description	Hours
03/20/2024	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
<b>Subtotal 03/20/2024</b>					<b>2.1</b>

Date	Employee Name	Role	Task	Description	Hours
03/21/2024	Kevin Wasserman	Associate	Case Administration	Correspondence with counsel.	0.2
<b>Subtotal 03/21/2024</b>					<b>0.2</b>

Date	Employee Name	Role	Task	Description	Hours
03/26/2024	Laura Tondreault	Analyst	Case Administration	Prepare and organize general case documents for accuracy and completeness	0.1
03/26/2024	Pauline Aragon	Analyst	Case Administration	Sort and manage incoming mail re: various mailings	0.1
03/26/2024	Robert Saraceni	Director	Claims Administration and Objections	Review correspondence, perform claims reconciliation, review and upload response and consent letters, update claims register	3.8
03/26/2024	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
<b>Subtotal 03/26/2024</b>					<b>4.2</b>

Date	Employee Name	Role	Task	Description	Hours
03/27/2024	Robert Saraceni	Director	Claims Administration and Objections	Review correspondence, perform claims reconciliation, review and upload response and consent letters, update claims register	1.1
03/27/2024	Robert Saraceni	Director	Claims Administration and Objections	Review correspondence, perform claims reconciliation, review and upload response and consent letters, update claims register	3.5
03/27/2024	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
<b>Subtotal 03/27/2024</b>					<b>4.8</b>

Date	Employee Name	Role	Task	Description	Hours
03/28/2024	Robert Saraceni	Director	Claims Administration and Objections	Review correspondence, perform claims reconciliation, review and upload response and consent letters, update claims register	4.9
03/28/2024	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
<b>Subtotal 03/28/2024</b>					<b>5.1</b>

Date	Employee Name	Role	Task	Description	Hours
03/29/2024	Robert Saraceni	Director	Claims Administration and Objections	Review correspondence, perform claims reconciliation, review and upload response and consent letters, update claims register	1.7
03/29/2024	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
<b>Subtotal 03/29/2024</b>					<b>1.8</b>

Date	Employee Name	Role	Task	Description	Hours
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Date	Employee Name	Role	Task	Description	Hours
03/30/2024	Robert Saraceni	Director	Claims Administration and Objections	Claims and register review and preparation	6.9
03/30/2024	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
<b>Subtotal 03/30/2024</b>					<b>7.2</b>
<b>Total 03/01/2024 - 03/31/2024</b>					<b>53.8</b>

**EXHIBIT F-1**

# Deborah D. Williamson

## Member

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## Contact

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dwilliamson@dykema.com

## Overview

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

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

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

Deborah has been named a leader in her field by *Chambers 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

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

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

### Litigation

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

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

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

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

### Bankruptcy and Restructuring — Energy

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

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

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

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

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

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

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

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

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

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

**Bankruptcy and Restructuring — Retail**

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

The Firm was counsel to the secured lender.

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

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

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

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

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

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

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

**Cross Border**

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

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

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

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



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

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

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

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

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

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

**Asset Acquisition**

**Dee Howard Aircraft**

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

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

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

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

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

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

**Plan Mediator**

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

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

## 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, 2003-2023
- Recipient of the *San Antonio Business Journal's* 2019 Outstanding Lawyers Award
- Recipient of the *Michelle A. Mendez Award of Excellence* for outstanding service to the Bankruptcy Law Section, 2017
- Finalist in Bankruptcy for the "Go-To-Guide," *Texas Lawyer*, 2007 and 2012
- American Bankruptcy Institute, "Lifetime Achievement Award", 2011
- Named "San Antonio Bankruptcy & Creditor-Debtor Rights Lawyer of the Year," *The Best Lawyers In America*®, 2011
- Selected for inclusion as a "Top Lawyer," *Corporate Counsel*® - *January 2010 Annual Guide*
- Selected for inclusion in the "Top 50 Women Lawyers in Texas," *Law and Politics Magazine*
- Selected for inclusion in the "Top 50 Women Lawyers in Texas" *Texas Super Lawyers*®
- *Euromoney Guide to Leading U.S. Insolvency Lawyers*
- Recognized by *S.A. Scene* in "San Antonio's Best Lawyers" for Bankruptcy
- *Strathmore's Who's Who*

## Affiliations

### Professional

- State Bar of Texas, Bankruptcy Law Section, Chair, 2006-2007
- Texas Bar Foundation, Life Fellow
- American College of Bankruptcy, Fellow (1998), Director, and Board of Regents, 2013-present

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

#### **Community**

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

**EXHIBIT F-2**

# Danielle Rushing Behrends

## Member

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## 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

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

## Affiliations

### Professional

- Larry E. Kelly American Bankruptcy Inn of Court (2015-present) ◦ Bylaws Committee ◦ Judge Monroe and Judge McConnell Scholarship and Writing Competition Selection Committee
- National Conference of Bankruptcy Judges – Next Generation Program, Class of 2023
- San Antonio Young Lawyers Association and Foundation, Director and Board Member (2018-2022)
- Bexar County Women's Bar Association and Foundation, Director (2018), Secretary (2019), Vice President (2020), President-Elect (2021), President; BCWBF LEAD Academy Steering Committee (2022)
- NAFER, Young Professionals Committee, Conference Committee, and Judicial Outreach Committee
- Dykema Women's Business Initiative, Texas Leader
- Class of 2020-21 LeadershipSBOT
- Texas Bar Foundation, Fellow
- State Bar of Texas, Member of the State Bar's Minimum Continuing Legal Education Committee, Bankruptcy Section's Young Lawyers Committee, Communications Liaison (2021), Non-Lawyer Outreach Liaison (2020), Women in Law Section, Member, Bankruptcy Section, Member

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

### **Community**

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



# Michael G. Cumming

## Member

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## Contact

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## Overview

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

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

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

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

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

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

## Areas of client focus

### Practices

Tax  
Estate Planning and  
Administration  
Public Retirement  
Corporate and Finance

## Credentials

### Education

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

### Bar Admissions

- Michigan, 1984

### Professional Recognition

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

## Affiliations

### Professional

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

# Patrick L. Huffstickler

## Senior Counsel

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### 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

**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

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### 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

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**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
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**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**



## **Ahuja & Consultants, Inc.**

### **Certified Public Accountants**

#### **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.

##### **Arti Kathiriya**

Arti will serve as tax support for this engagement. Arti Kathiriya has over 7+ years of accounting and tax experience including 3 years as reviewer in public accounting. She has a knowledge of financial accounting, financial reporting, tax compliance of federal, state and international filing.

##### **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.

##### **Deborah Denison**

Deborah will serve as forensic and administrative support and provide assistance with data files. She has been working with Ahuja and Clark for 10 years with 8 of them as a manager. Deborah is highly skilled in accounting and data analytics.

##### **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.

##### **Geneva Newton**

Geneva will serve as administrative support and provide assistance with data files. She has 2 years experience as an executive administrative assistant. She is proficient at using MS Office suite along with Gsuite. Geneva joined the A&C team in December of 2021.



## **Ahuja & Consultants, Inc.**

### **Certified Public Accountants**

#### **Jared Kleinpeter**

Jared will serve as forensic support staff for this engagement. His background includes over 7 years of accounting experience in a variety of different industries, as well as over 4 years of administrative and operational experience.

#### **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.

#### **Natasha Toeteberg-Harms**

Natasha brings over 5 years of experience to Ahuja & Consultants (formerly Ahuja & Clark, PLLC), having most recently worked as a Senior Consultant within the Forensics practice of a large public accounting firm in Zürich, Switzerland. Natasha's project experience includes topics of corporate compliance, regulatory compliance assessments, bribery and corruption investigations, financial statement fraud, procurement fraud, and accounting irregularities. Her skills include project management of large and complex multinational projects and advising and assisting clients on fraud risk management.

**EXHIBIT F-7**



**Daniel McElhinney**

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

**Robert Saraceni**

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

**Kevin Wasserman**

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

**Daniel Ramirez**

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

### **Sheryl Betance**

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

### **Aileen Daversa**

As Director, Aileen brings nearly two decades of corporate-restructuring expertise to her role as Director. As a former financial advisor, she effectively guides distressed companies through the restructuring and turnaround process. Aileen has significant financial consulting experience in pre- and post-filing proceedings working with clients across jurisdictions. Clients rely on her meticulous guidance and deep subject-matter understanding in preparing Statements of Financial Affairs, Schedules of Assets and Liabilities, claims and distribution analysis, and procedural management. With expertise across varied industries and sectors, she has worked on notable engagements such as Lehman Brothers, Smurfit Stone and US Airways. Prior to joining Stretto, Aileen played an integral role in the restructuring and turnaround practices with Alvarez & Marsal, FTI Consulting and PricewaterhouseCoopers.

### **Melissa Membrino**

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

### **Pauline Aragon**

In her previous role as Intake Specialist in Operations, Pauline was responsible for providing administrative support services including scanning and inputting data for ballots, claims, returned mail and any other documentation. Her current role is as a Print Production Associate, in Production, Naomi is responsible for managing and maintaining production printers and inserters to produce quality mail pieces meeting all client requirements, postal regulations, and Stretto standards protecting the integrity of all confidential information.

**Alberto Chachaqua**

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

**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.

**Ricky Quang**

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

**Naomi Rodriguez**

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

**Charles Wheeler**

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

**Jessie De Guzman**

In her role as Senior 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.

**IT Staff**

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

**Jose Cruz**

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

**Keny Contreras**

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

**Laura Tondreault**

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

**Lindsay Litt**

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

**Monica Arellano**

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

**Staphany Alcantar**

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

**Stephanie Delgado**

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

**Casandra Segura**

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

**Kevin Streseman**

With over 25 years of IT experience and two decades within the Corporate Restructuring realm, Kevin Streseman bring a unique perspective to the industry. From analyzing and processing data to designing solutions for client requests, he has been an integral part in numerous high-profile cases, including Lehman Brothers, Delta Airlines, United Airlines, Chrysler, and the Los Angeles Dodgers. Prior to joining Stretto, Kevin was affiliated with several legal service companies.