

**RECEIVER’S FEE APPLICATION FOR SERVICES PERFORMED BETWEEN
JANUARY 1, 2026 AND MARCH 31, 2026, AND BRIEF IN SUPPORT**

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

Pursuant to the *Order Approving Employment of Dykema Gossett PLLC as Counsel to the Receiver Effective as of December 3, 2021* [ECF No. 19] (the “Dykema Employment Order”), the *Order* [ECF No. 180] (the “Ahuja Employment Order”) approving the *Application to Employ Ahuja & Clark, PLLC as Accountants to Receiver Effective April 1, 2022*, the *Order* [ECF No. 331] (the “Stretto Employment Order”) approving the *Receiver’s Application to Employ Bankruptcy Management Solutions Inc. d/b/a Stretto as Claims and Disbursement Agent*, and the *Order* [ECF No. 718] approving the *Expedited Application to Employ Higgs & Johnson as Bahamian Counsel to Receiver Effective as of March 7, 2025* [ECF No. 709] (the “H&J Employment Order”), Deborah D. Williamson, in her capacity as the Court-appointed Receiver (the “Receiver”) for the Receivership Parties (as defined in the *Order Appointing Receiver* [ECF No. 17] (the “Receivership Order”))¹ and receivership estates (collectively, the “Receivership Estates”) in the above-captioned case (the “Case” or the “Receivership”), hereby submits this *Receiver’s Fee Application for Services Performed Between October 1, 2025 and December 31, 2025, and Brief in Support* (the “Application”) of Deborah D. Williamson, as Receiver, Dykema Gossett PLLC (“Dykema”), Higgs & Johnson (“H&J”), Ahuja & Clark, PLLC n/k/a Ahuja & Consultants, Inc. (“Ahuja”), and Stretto, Inc. (“Stretto”). In support of the Application, the Receiver respectfully states as follows:

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

I. OVERVIEW

1. As more fully detailed in the *Receiver's Eighteenth Quarterly Report for Receivership Estates (January 1, 2026 – March 31, 2026)* [ECF No. 820] (the "Eighteenth Report"), the Receiver's primary focus was preparation of the two (2) pieces of real property located on Cat Island in the Commonwealth of the Bahamas (the "Bahamas Properties") for sale, drafted and negotiated the engagement letter and Multiple Listing Service (MLS) agreement with the broker, and communicated with various creditors, including investors (potential and known), vendors, and governmental agency contacts.

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

3. The Receiver, Dykema, and the professionals employed on behalf of the Receiver in this Case are very cognizant of the need to balance performance of their duties with costs.

4. Dykema has voluntarily reduced the requested reimbursement by \$4,321.00, including time spent by the Receiver and by Dykema attorneys during the Application Period.

5. At the beginning of the first quarter of 2026, the Receiver had \$1,277,429.13 on deposit. At the end of the first quarter of 2026, the amount on deposit was \$1,224,761.68 after issuance of Court-approved distributions and payments of operating expenses and Court-approved fees and expenses. As of the filing of this Application (May 15, 2026), \$1,224,926.77 is in the Receivership bank accounts.

II. RELIEF REQUESTED

6. This Application seeks authorization from the Court to pay on an interim basis fees and expenses for professional services performed from January 1, 2026 through March 31, 2026

(the “Application Period”), by the Receiver in the amount of \$9,382.50 for fees; Dykema, as lead counsel to the Receiver, in the amount of \$27,129.00 for fees and in the amount of \$5,143.27 for expenses; H&J, as Bahamian counsel to the Receiver, in the amount of B\$2,300.00 for fees, in the amount of B\$230.00 for the 10% Value Added Tax (“VAT”), totaling B\$2,530.00; Ahuja, as tax and forensic accountants to the Receiver, in the amount of \$18,942.50 for fees and in the amount of \$474.11 for expenses; and Stretto, as claims and disbursement agent to the Receiver, in the amount of \$1,280.00 for fees and in the amount of \$25.60 for expenses. The Receiver respectfully requests this Court enter the proposed order attached hereto as **Exhibit B**, approving this Application on an interim basis and authorizing the Receiver to pay outstanding amounts approved thereunder.

7. The Receivership Order at ¶ 62 requires that the “Receiver and Retained Personnel shall apply to the Court for compensation and expense reimbursement from the Receivership Estates” within forty-five (45) days of the end of each calendar quarter. Thus, this Application covers January 1, 2026 through March 3, 2026.

III. GENERAL BACKGROUND

8. This Application is submitted in accordance with the Receivership Order, the local rules of this Court, and the *Billing Instructions for Receivers in Civil Actions Commenced by the United States Securities and Exchange Commission* (the “Commission Billing Instructions”), and other applicable orders of this Court. The Receiver, Dykema, Ahuja, and Stretto have previously submitted fee applications to this Court in this Case. *See generally* ECF Nos. 132, 198, 245, 280, 334, 361, 386, 427, 453, 540, 601, 668, 741, 785, 797, 809. Through the fourth quarter of 2025, the Receiver, Dykema, Ahuja, H&J, and Stretto have been paid on an interim basis for services performed on behalf of the Receiver in this Case, all to the extent authorized by this Court. *See generally* ECF Nos. 163, 216, 259, 265, 290, 348, 372, 407, 439, 460, 554, 620, 712, 747, 793,

804, 816. The Receiver submitted this Application to the Commission (as defined below) for review prior to submission to the Court.

A. Procedural History

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

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

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

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

13. On December 3, 2021, the Receiver filed under seal her *Application to Employ Dykema Gossett PLLC as Counsel to Receiver Effective as of December 3, 2021* [ECF No. 18] (the “Dykema Application”). As detailed in the Dykema Application, the Receiver agreed to

significantly discounted rates for Dykema professionals through 2022 in this Case.² Dykema has agreed to keep the discounted rates until further notice.

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

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

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

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

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

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

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

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

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

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

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

B. Work Performed During the Application Period

24. Since the beginning of this Case, the tasks and challenges presented have been numerous and, in many instances, novel, complex, and time-consuming. The efforts of the Receiver and her Retained Personnel during the Application Period resulted in several successful negotiations and settlements in this Case and execution of the Court-approved claims and distribution procedures.

25. The Receiver incorporates by reference the *Receiver’s First Quarterly Report for Receivership Estates* [ECF No. 126], the *Receiver’s Second Quarterly Report for Receivership Estates* [ECF No. 189], the *Receiver’s Third Quarterly Report for Receivership Estates* [ECF No. 242], the *Receiver’s Fourth Quarterly Report for Receivership Estates* [ECF No. 274], the *Receiver’s Fifth Quarterly Report for Receivership Estates* [ECF No. 320], the *Receiver’s Sixth Quarterly Report for Receivership Estates* [ECF No. 350], the *Receiver’s Seventh Quarterly Report for Receivership Estates* [ECF No. 380], the *Receiver’s Eighth Quarterly Report for*

Receivership Estates [ECF No. 426], the *Receiver's Ninth Quarterly Report for Receivership Estates* [ECF No. 452], the *Receiver's Tenth Quarterly Report for Receivership Estates* [ECF No. 496], *Receiver's Eleventh Quarterly Report for Receivership Estates* [ECF No. 571], *Receiver's Twelfth Quarterly Report for Receivership Estates* [ECF No. 601], *Amended Receiver's Thirteenth Quarterly Report for Receivership Estates* [ECF No. 668], *Receiver's Fourteenth Quarterly Report for Receivership Estates* [ECF No. 740], *Receiver's Fifteenth Quarterly Report* [ECF No. 767], *Receiver's Fifteenth Quarterly Report for Receivership Estates* [ECF No. 795], *Receiver's Sixteenth Quarterly Report for Receivership Estates* [ECF No. 795], *Receiver's Seventeenth Quarterly Report for Receivership Estates* [ECF No. 808], and the Eighteenth Quarterly Report (collectively, the "Receiver's Quarterly Reports") for information regarding the Case status, as required by the Commission Billing Instructions and the Receivership Order.

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

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

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

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

C. Fees and Expenses Summary During the Application Period

30. Through this Application, Dykema seeks approval on an interim basis for fees and expenses incurred by the Receiver and other Dykema professionals. Dykema expended an aggregate of 60.80 hours on this Case during the Application Period. At Dykema's discounted hourly rates and after other voluntary reductions, Dykema's fees for the Application Period total \$27,129.00 and expenses incurred in connection with services performed on behalf of the Receiver during the Application Period total \$5,143.27.³

31. The Receiver expended an aggregate of 13.90 hours on this Case during the Application Period. The Receiver's fees for the Application Period total \$9,382.50.

32. H&J expended an aggregate of 3.00 hours on this Case during the Application Period. H&J's fees for the Application Period total B\$2,300.00, in addition to B\$230.00 for the 10% VAT. H&J's total compensation requested during this Application Period is B\$2,530.00. H&J did not incur any expenses during the Application Period.

33. Ahuja expended an aggregate of 77.10 hours on this Case during the Application Period. Ahuja's fees for the Application Period total \$18,942.50 and expenses incurred in

³ Dykema advanced expenses for the benefit of the Receivership Estates. Details for expenses of Dykema during the Application Period can be found on the Dykema invoice attached hereto as **Exhibit E-1**. Dykema does not charge for photocopy projects of less than 10 pages.

connection with services performed on behalf of the Receiver during the Application Period total \$474.11.

34. Stretto expended an aggregate of 7.10 hours on this Case during the Application Period. Stretto's fees for the Application Period total \$1,280.00 and expenses incurred in connection with services performed on behalf of the Receiver during the Application Period total \$25.60.

IV. RECORDS SUPPORTING THIS APPLICATION

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

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

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

38. Dykema, H&J, Ahuja, and Stretto have maintained written records of the time expended in the rendition of professional services to the Receiver. The Receiver has also maintained written records of the time expended in the rendition of professional services in this

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

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.

39. In addition, Dykema has categorized their services by task.⁵ Attached hereto as **Exhibit D** is the *Summary of Fees by Task for All Matters*, which summarizes the number of hours incurred relative to each task category for each firm during the Application Period. It contains individualized and detailed descriptions of the daily services rendered and the hours expended by the professionals employed on behalf of the Receiver in this Case. During this Application Period, Dykema incurred \$5,143.27 in expenses in connection with the rendition of services on behalf of the Receiver, Ahuja incurred \$474.11 in expenses in connection with the rendition of services on behalf of the Receiver, and Stretto incurred \$25.60 in expenses in connection with the rendition of services on behalf of the Receiver. The Receiver and H&J did not incur any expenses during the Application Period.

40. Attached hereto as **Exhibit E-1** is the invoice of Dykema. Attached hereto as **Exhibit E-2** is the invoice of H&J during the Application Period. Attached hereto as **Exhibit E-3** is the invoice of Ahuja during the Application Period. Attached hereto as **Exhibit E-4** is the invoice of Stretto during the Application Period. The Receiver has reviewed and approved these time records, and based on the complexity and novelty of issues presented in this Case, the Receiver respectfully submits that the requested compensation is reasonable.

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

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

V. STANDARDIZED FUND ACCOUNTING REPORT

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

VI. BRIEF IN SUPPORT OF APPLICATION

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

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

participating attorney.” *SEC v. Megafund Corp.*, No. 3:05-CV-01328-L, 2006 WL 42367, at *4 (N.D. Tex. Jan. 9, 2006). When determining whether the time spent, services performed, expenses incurred, and hourly rates charged are reasonable and necessary under the factors set forth by the Fifth Circuit, courts consider: (1) the time and labor required for the litigation; (2) the novelty and complication of the issues; (3) the skill required to properly litigate the issues; (4) whether the attorney was precluded from other employment by acceptance of the case; (5) the attorney’s customary fee; (6) whether the fee is fixed or contingent; (7) whether the client or the circumstances imposed time limitations; (8) the amount involved and the results obtained; (9) the experience, reputation, and ability of the attorney; (10) the “undesirability” of the case; (11) the nature and length of the attorney-client relationship; and (12) awards in similar cases. *Johnson v. Ga. Hwy. Express, Inc.*, 488 F.2d 714, 717–19 (5th Cir. 1974); *see, e.g., SEC v. Millennium Bank, et al.*, No. 7:09-CV-00050-O (ECF Nos. 193, 197, 296); *SEC v. Megafund Corp.*, 2008 WL 2839998, at *2 (N.D. Tex. June 24, 2008); *SEC v. Funding Res. Grp.*, 3:98-CV-02689-M, 2003 WL 145411, at *1 (N.D. Tex. Jan. 15, 2003). In applying the *Johnson* factors, the district court should explain its findings and the reasons upon which an award is based, but “it is not required to address fully each of the 12 factors.” *Curtis v. Bill Hanna Ford, Inc.*, 822 F.2d 549, 552 (5th Cir. 1987) (citation omitted). This examination of reasonable and necessity should take into account all of the circumstances surrounding the case. *See SEC v. W.L. Moody & Co., Bankers (Unincorporated)*, 374 F. Supp. 465, 480 (S.D. Tex. 1974), *aff’d*, 519 F.2d 1087 (5th Cir. 1975). The court should analyze the fees and expenses relative to each receivership case. *See SEC v. Tanner*, No. 05-04057, 2007 WL 2013606, at *3 (D. Kan. May 22, 2007).

45. The complexity and difficulty associated with the receivership case are highly relevant factors in determining the reasonableness of professional fees. *See W.L. Moody & Co.*,

374 F. Supp. at 484; *SEC v. Fifth Ave. Coach Lines, Inc.*, 364 F. Supp. 1220, 1222 (S.D.N.Y. 1973). Since the inception of this Case, the Receiver and her team have had to conduct their work without meaningful assistance from nearly all of the Defendants and Relief Defendants, exacerbated by the inability to access the various Receivership Parties' accounting and regulatory books, records, and software. The Receiver and her Retained Personnel have spent significant time and resources recovering the Bahamas Properties as Receivership Assets and preparing the Bahamas Properties for sale.

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

47. Since December 2021, the Receiver and her team have successfully recovered over \$25 million dollars from the sale and/or auctions of personal property, the sale of real property, and settlements. This figure is before payment of contingency fees or other disbursements.

48. Courts also examine the credentials, experience, reputation, and other professional qualities required to carry out a receiver's duties and responsibilities when assessing the reasonableness of the rates charged for services in a receivership. *See W.L. Moody & Co.*, 374 F. Supp. at 481; *SEC v. Aquacell Batteries, Inc.*, No. 6:07-cv-608-Orl-22DAB,

2008 WL 276026, at *4 (M.D. Fla. Jan. 31, 2008) (“The Receiver retained well qualified, experienced counsel and such representation does not come cheap.”). Biographies of all Retained Personnel of the Receiver are attached hereto as **Exhibits F-1, F-2, F-3, F-4, and F-5** for the Receiver, Dykema, H&J, Ahuja, and Stretto, respectively.

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

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

51. The time spent, services performed, hourly rates charged, and expenses incurred by the Receiver’s Retained Personnel have been at all times reasonable and necessary, and indeed

critical, for the Receiver to perform her Court-ordered duties. The Receiver respectfully suggests the qualifications set forth in this Application for the Receiver's, Dykema's, H&J's, Ahuja's, and Stretto's fees and expenses, as applicable, during the Application Period meet the criteria for interim compensation when considering the *Johnson* factors.

Dykema

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

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

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

- (a) Communicating with investors (both known and potential), creditors, and other state and federal governmental authorities regarding various Receivership Parties, including, but not limited to, via website (www.heartlandreceivership.com), telephone (210-554-5845), and email (heartlandreceivership@dykema.com);

- (b) Researching, drafting, and filing various pleadings, proposed orders, and supporting documentation, as applicable;
- (c) Facilitating administrative and daily operational tasks requested by the Receiver;
- (d) Mitigating risks;
- (e) Pursuing and/or settling causes of action held by the Receivership Estates; and
- (f) Working with PwC and H&J in the recovery and security of the Bahamas Properties, as well as the preparing the Bahamas Properties for sale.

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

H&J

56. During the Application Period, H&J's services rendered during the Application Period included providing the Receiver with advice related to her duties as Foreign Representative. Additionally, H&J continues to work with PwC to prepare sale documentation for the Bahamas Properties.

Ahuja

57. During the Application Period, Ahuja performed routine general accounting work for all Receivership Parties, in addition to preparing and submitting the federal tax returns for the required Receivership Parties, including preparation of 1099's and W-8BEN for the Receiver's Retained Personnel and K-1's for equity investors. .

Stretto

58. During the Application Period, Stretto served as the Receiver's claims and disbursement agent in this Case. Stretto communicated with the Receiver and her Retained Personnel throughout the Application Period and continued to update investor and non-investor contact information during the Application Period at the request of Dykema.

PwC

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

Fees and Expenses of Receiver's Retained Personnel

60. The Receiver and her Retained Personnel have performed a substantial amount of work during the Application Period; however, work remains on the termination of various Receivership Parties, the potential recovery of additional fraudulent transfers, and the sale of the Bahamas Properties.

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

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

<u>PROFESSIONAL</u>	<u>TOTAL HOURS</u>	<u>TOTAL FEES</u>	<u>TOTAL EXPENSES</u>
Deborah D. Williamson, Receiver	13.90 hours	\$9,382.50	\$0.00
Dykema Gossett PLLC	60.80 hours	\$27,219.00	\$5,143.27
Higgs & Johnson ⁶	3.00 hours	B\$2,300.00	B\$0.00
Ahuja & Clark, PLLC n/k/a Ahuja & Consultants, Inc.	77.10 hours	\$18,942.50	\$474.11
Stretto, Inc.	7.10 hours	\$1,280.00	\$25.60

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

64. The fees associated with complex receivership cases often have been substantial percentages of the total assets found. *See, e.g., Megafund*, 2008 WL 2839998, at *2 (N.D. Tex. June 24, 2008); *Funding Res. Grp.*, 2003 WL 145411, at *1 (N.D. Jan. 15, 2003). As the Court can see in **Exhibits E-1, E-2, E-3, E-4, and E-5** the Receiver and her Retained Personnel have been mindful of keeping fees expended to a minimum, while ensuring that the goals and needs of the Case, particularly, the hundreds of investors and other creditors, are met. If the fees and expenses are approved and paid as requested, remaining funds available will exceed approximately \$1,225,146.56, exclusive of any future recovery.

⁶ The total compensation requested by H&J during the Application Period is B\$2,300.00, including 10% VAT in the amount of B\$230.00.

VII. CONCLUSION

65. For the reasons stated herein, the Receiver requests that the Court enter an order (a) approving on an interim basis and authorizing payment of (i) all fees incurred by the Receiver during the Application Period, totaling \$9,382.50, (ii) all fees incurred by Dykema as counsel to the Receiver during the Application Period, totaling \$27,129.00, (iii) all fees incurred by H&J as Bahamian counsel to the Receiver during the Application Period, totaling B\$2,300.00 and the 10% VAT in the amount of B\$230.00, (iv) all fees incurred by Ahuja as tax and forensic accountants to the Receiver during the Application Period, totaling \$18,942.50, and (vi) all fees incurred by Stretto as claims and disbursement agent to the Receiver during the Application Period, totaling \$1,280.00; (b) approving on an interim basis and authorizing payment of (i) all expenses incurred by Dykema in connection with services rendered as lead counsel to the Receiver during the Application Period, totaling \$5,143.27, (ii) all expenses incurred by Ahuja as tax and forensic accountants to the Receiver during the Application Period, totaling \$474.11, and (iii) all expenses incurred by Stretto as claims and disbursement agent to the Receiver during the Application Period, totaling \$25.60; (c) authorizing the Receiver to pay (i) all authorized outstanding fee amounts to Dykema, including the Receiver's fees, totaling \$30,440.00, (ii) all authorized outstanding fee amounts to H&J, totaling B\$2,300.00 and the 10% VAT in the amount of B\$230.00, (iii) all authorized outstanding fee amounts to Ahuja, totaling \$18,942.50, and (iv) all authorized outstanding fee amounts to Stretto, totaling \$1,280.00; (d) authorizing the Receiver to pay (i) all authorized outstanding expenses of Dykema, totaling \$5,143.27, (ii) all authorized outstanding expenses of Ahuja, totaling \$474.11, and (iii) all authorized outstanding expenses of Stretto, totaling \$25.60; and (e) awarding such other and further relief that this Court deems just and proper.

Dated: May 15, 2026

Respectfully submitted,

By: /s/ Deborah D. Williamson

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

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

and

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

COUNSEL TO RECEIVER

and

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

ACCOUNTANT TO RECEIVER

and

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

**CLAIMS AND DISBURSEMENT
AGENT TO RECEIVER**

CERTIFICATE OF CONFERENCE

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

/s/ Dominique A. Douglas
Dominique A. Douglas

CERTIFICATE OF SERVICE

I hereby certify that on May 15, 2026, the foregoing document was served via CM/ECF on all parties appearing in this case and via email on the following unrepresented parties on this Court's docket:

James Ikey
james.ikeyrcg@gmail.com

Bridy Ikey
bridydikey@gmail.com

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

John Muratore
jmuratore6@gmail.com

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

Thomas Brad Pearsey
bradpearsey@aol.com

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

Sunny Sahota
sunnysanangelo@gmail.com

/s/ Dominique A. Douglas
Dominique A. Douglas

APPLICATION CERTIFICATION

I hereby certify that:

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

/s/ Deborah D. Williamson
Deborah D. Williamson, Receiver
Dykema Gossett PLLC
Applicant

APPLICATION CERTIFICATION

I hereby certify that:

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

/s/ Danielle Rushing Behrends
Danielle Rushing Behrends
Dykema Gossett PLLC
Applicant

APPLICATION CERTIFICATION

I hereby certify that:

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

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

APPLICATION CERTIFICATION

I hereby certify that:

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

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

APPLICATION CERTIFICATION

I hereby certify that:

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

/s/ Tara A. Archer-Glasgow
Tara A. Archer-Glasgow
Higgs & Johnson
Applicant

EXHIBIT A

		Detail	Subtotal	Grand Total
1	Beginning Balance (January 1, 2026):			\$ 1,277,429.13
2	Business Income		-	-
3	Cash and Cash Equivalents			
4	Interest/Dividend Income		397.11	397.11
5	Business Asset Liquidation			
6	Personal Asset Liquidation			
7	Third-Party Litigation Income			
8	Miscellaneous - Other	funds recd		
	Total Funds Available			\$ 1,277,826.24
9	Disbursements to Investors			\$ -
		Class 4, 4a		
		Class 5		
10	Disbursements for Receivership Operations		-	\$ 53,064.56
10a	Disbursements to Receiver or Other Professionals	Payments to Attorneys, Accountants, Receiver	52,719.56	
10b	Business Asset and Operating Expenses	Filing fees, Insurance	45.00	
10c	Personal Asset Expenses			
10d	Investment Expenses			
10e	Third-Party Litigation Expenses			
10f	Tax Administrator Fees and Bonds			
10g	Federal and State Tax Expenses	Delaware Franchise Tax paid - Heartland Drilling Fund I, LP	300.00	
11	Disbursements for Distribution Expenses Paid by the Fund			
11a	Distribution Plan Development Expenses			
11b	Distribution Plan Implementation Expenses			
12	Disbursements to Court/Other			
12a	Court Registry Investment System (CRIS) or other banking fees related to the Fund.			
12b	Federal income taxes			
	Total Funds Disbursed			\$ 53,064.56
13	Ending Balance (March 31, 2026)			\$ 1,224,761.68
14	Ending Balance of Fund - Net Assets			
14a	Cash & Cash Equivalents		\$ 1,224,761.68	
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	0 claims		
18a	the number of claims received from investors during this reporting period	734 claims		
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: 1/01/2026 to 3/31/2026

		Detail	Subtotal	Grand Total
19	No. of Claimants/Investors	6 claimants		
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	630 claimants		

EXHIBIT B

**ORDER APPROVING RECEIVER'S FEE APPLICATION FOR SERVICES PERFORMED
BETWEEN JANUARY 1, 2026 AND MARCH 31, 2026, AND BRIEF IN SUPPORT**

Before the Court is the *Fee Application for Services Performed Between January 1, 2026 and March 31, 2026, and Brief in Support* (the "Application"),¹ filed by Deborah D. Williamson, Court-appointed Receiver in the Case, pursuant to the Court's *Order Appointing Receiver* [ECF No. 17], entered on December 2, 2021, in this Case, requesting approval and authorization of fees and expenses incurred by Deborah D. Williamson, as Receiver; Dykema Gossett PLLC ("Dykema"); Higgs & Johnson ("H&J"); Ahuja & Clark, PLLC n/k/a Ahuja & Consultants, Inc. ("Ahuja"); and Stretto, Inc. ("Stretto"), during the Application Period. Upon consideration of the Application, the Court finds that: (i) it has subject matter jurisdiction over the Application; (ii) it has personal jurisdiction over the Receivership Parties; (iii) the Receiver, Dykema, H&J, Ahuja, and Stretto have provided reasonable services at reasonable rates that have benefitted the Receivership Estates during the Application Period; (iv) the relief requested in the Application is in the best interests of the Receivership Estates and all parties-in-interest thereof; (v) proper and adequate notice of the Application has been given and that no other or further notice is necessary; and (vi) the deadline for filing objections to the Application has expired and no objection to the Application was filed with this Court; accordingly,

IT IS HEREBY ORDERED, ADJUDGED, AND DECREED THAT:

1. The Application is **APPROVED** to the extent set forth herein.
2. The Receiver's fees incurred during the Application Period are approved on an interim basis and allowed in the amount of **\$9,382.50**.

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

3. Dykema's fees incurred during the Application Period are approved on an interim basis and allowed in the amount of **\$27,129.00**.

4. H&J's fees incurred during the Application Period are approved on an interim basis and allowed in the amount of **B\$2,300.00**, in addition to the 10% VAT in the amount of **B\$230.00**.

5. Ahuja's fees incurred during the Application Period are approved on an interim basis and allowed in the amount of **\$18,942.50**.

6. Stretto's fees incurred during the Application Period are approved on an interim basis and allowed in the amount of **\$1,280.00**.

7. Dykema's expenses incurred during the Application Period in connection with services rendered on behalf of the Receiver are approved on an interim basis and allowed in the amount of **\$5,143.27**.

8. 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 **\$474.11**.

9. Stretto's expenses incurred during the Application Period in connection with services rendered on behalf of the Receiver are approved on an interim basis and allowed in the amount of **\$25.60**.

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

SO ORDERED.

[_____], 2026.

HAL R. RAY, JR.
UNITED STATES MAGISTRATE JUDGE

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

COUNSEL TO RECEIVER

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

<u>TIMEKEEPER</u>	<u>HOURS</u>	<u>HOURLY RATE</u>	<u>TOTAL FEES</u>
Deborah D. Williamson	13.90 hours	\$675.00	\$9,382.50

Dykema Gossett PLLC

<u>TIMEKEEPER</u>	<u>TITLE</u>	<u>HOURS</u>	<u>HOURLY RATE</u>	<u>TOTAL FEES</u>
Behrends, Danielle Rushing	Member	49.00 hours	\$475.00	\$23,275.00
Douglas, Dominique A.	Associate	11.40 hours	\$330.00	\$3,762.00
Lafuente, Adrianna	Paralegal	0.40 hours	\$230.00	\$92.00

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

<u>TIMEKEEPER</u>	<u>HOURS</u>	<u>HOURLY RATE</u>	<u>TOTAL FEES</u>
Ahuja, Madhu	15.10 hours	\$325.00	\$4,907.50
Hall, Ammon	2.80 hours	\$120.00	\$336.00
Newton, Geneva	3.40 hours	\$95.00	\$323.00
Shetty, Divya	47.60 hours	\$250.00	\$11,900.00
Wallace, Jennifer	8.20 hours	\$180.00	\$1,476.00

Higgs & Johnson

<u>TIMEKEEPER</u>	<u>TITLE</u>	<u>HOURS</u>	<u>HOURLY RATE</u>	<u>TOTAL FEES</u>
Archer-Glasgow, Tara A.	Partner	2.50 hours	B\$800.00	B\$2,000.00
Major, Ja'Ann M.	Partner	0.50 hours	B\$600.00	B\$300.00

Stretto, Inc.

<u>TIMEKEEPER</u>	<u>HOURS</u>	<u>HOURLY RATE</u>	<u>TOTAL FEE</u>
Alcantar, Staphany	0.20	\$40.00	\$8.00
Alduenda, Jenice	0.10	\$550.00	\$55.00
Chachagua, Albert0	0.10	\$130.00	\$13.00
Danpongchareon, Pete	0.70	\$475.00	\$332.50
Lopez, Myles	0.40	\$65.00	\$26.00
Quang, Ricky	0.20	\$65.00	\$13.00
Ramirez, Daniel	1.90	\$135.00	\$256.50
Rodriguez, Naomi	0.10	\$65.00	\$6.50
Saraceni, Robert	2.70	\$195.00	\$526.50
Tondreault, Laura	0.60	\$50.00	\$30.00
Wheeler, Charles	0.10	\$130.00	\$13.00

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

<u>Category Description</u>	<u>Total Billable Amount</u>	<u>Total Billable Time</u>
Case Administration	\$742.50	1.10 hours
Asset Disposition	\$945.00	1.40 hours
Business Operations	\$3,105.00	4.60 hours
Tax Issues	\$3,375.00	5.00 hours
Status Reports	\$1,215.00	1.80 hours
TOTAL	\$9,382.50	13.90 hours

Dykema Gossett PLLC

<u>Category Description</u>	<u>Total Billable Amount</u>	<u>Total Billable Time</u>
Case Administration ⁸	\$8,814.50	20.90 hours
Asset Disposition	\$2,682.50	5.80 hours
Business Operations	\$6,241.00	13.20 hours
Tax Issues	\$6,526.00	13.80 hours
Claims Administration and Objection	\$99.00	0.30 hours
Status Reports	\$1,673.50	4.50 hours
Litigation Consulting	\$1,092.50	2.30 hours
TOTAL	\$27,129.00	60.80 hours

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

<u>Category Description</u>	<u>Total Billable Amount</u>	<u>Total Billable Time</u>
Accounting/Auditing	\$4,887.00	23.30 hours
Tax Services	\$14,055.50	53.80 hours
TOTAL	\$18,942.50	77.10 hours

Higgs & Johnson

Category Description	Total Billable Amount	Total Billable Time
Litigation Consulting	B\$2,300.00	3.00 hours
SUBTOTAL	B\$2,300.00	3.00 hours
10% VAT	B\$230.00	
TOTAL	B\$2,530.00⁹	

Stretto, Inc.

Category Description	Total Billable Amount	Total Billable Time
Case Administration	\$1,280.00	7.10 hours
TOTAL	\$1,280.00	7.10 hours

⁸ Calls from investors were often about the distribution process, inquiring about their distribution and the distribution timeline, and the status of the Receivership. There are entries tasked as “Case Administration” which also could be tasked as “Claims Administration and Objection.”

⁹ The total compensation (fees, expenses, and 10% VAT) requested by H&J during this Application Period is **B\$2,530.00**.

EXHIBIT E-1



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

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

DUE UPON RECEIPT

APRIL 30, 2026
MATTER #: 122686.000001
INVOICE #: 3718741

FOR PROFESSIONAL SERVICES RENDERED

RE: RECEIVER'S TIME

FEES	\$	3,645.00
INVOICE TOTAL	\$	3,645.00



DEBORAH D WILLIAMSON
 DEBORAH WILLIAMSON

MATTER #: 122686.000001
 INVOICE #: 3718741
 PAGE 2

APRIL 30, 2026

RE: RECEIVER'S TIME

DATE	ID	DESCRIPTION	HOURS
01/15/26	DDW	REVIEW AND RESPOND TO AHUJA & CONSULTANTS REGARDING TAX ISSUES AND ALLOCATION OF EXPENSES.	0.40
01/19/26	DDW	REVIEW OF ADDITIONAL ISSUES FOR TAX RETURNS; PREPARE FOR AND ATTEND CONFERENCE WITH AHUJA & CONSULTANTS.	1.00
01/21/26	DDW	COMMUNICATIONS REGARDING 1099S AND OTHER TAX RELATED ISSUES.	0.30
01/22/26	DDW	CONFERENCE REGARDING QUARTERLY REPORT AND BAHAMAS.	0.50
01/26/26	DDW	REVIEW AND REVISE QUARTERLY REPORT; CONFERENCE WITH MS. DOUGLAS REGARDING SAME.	1.30
01/26/26	DDW	REVIEW AND RESPOND TO INFORMATION AND INQUIRY FROM AHUJA & CONSULTANTS REGARDING TAX ISSUES.	0.50
01/27/26	DDW	PREPARE FOR AND ATTEND CONFERENCE AND EMAILS REGARDING TAXES INCLUDING ALLOCATION OF EXPENSES AND REVENUE; REVIEW OF DRAFT 1099 AND OTHER FILINGS.	1.10
01/30/26	DDW	DRAFT AND RESPOND TO INQUIRING FROM AHUJA & CONSULTANTS REGARDING 1099S.	0.30
		TOTAL HOURS	5.40
		TOTAL	\$3,645.00



DEBORAH D WILLIAMSON
DEBORAH WILLIAMSON

MATTER #: 122686.000001
INVOICE #: 3718741
PAGE 3

APRIL 30, 2026

BILLING SUMMARY

ID	TIMEKEEPER	HOURS	RATES	AMOUNT
DDW	DEBORAH WILLIAMSON	5.40	675.00	3,645.00
	TOTAL	5.40		\$3,645.00



DEBORAH D WILLIAMSON
DEBORAH WILLIAMSON

MATTER #: 122686.000001
INVOICE #: 3718741
PAGE 4

APRIL 30, 2026

TASK SUMMARY

TASK	TASK DESCRIPTION	HOURS	AMOUNT
B240	TAX ISSUES	3.60	2,430.00
BT155	STATUS REPORTS	1.80	1,215.00
	TOTAL	5.40	3,645.00



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

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

DUE UPON RECEIPT

APRIL 30, 2026
MATTER #: 122686.000001
INVOICE #: 3724761

FOR PROFESSIONAL SERVICES RENDERED

RE: RECEIVER'S TIME

FEES	\$	3,240.00
INVOICE TOTAL	\$	3,240.00



DEBORAH D WILLIAMSON
DEBORAH WILLIAMSON

MATTER #: 122686.000001
INVOICE #: 3724761
PAGE 2

APRIL 30, 2026

RE: RECEIVER'S TIME

DATE	ID	DESCRIPTION	HOURS
02/09/26	DDW	CONFERENCE REGARDING INVESTOR INQUIRY REGARDING SEC ACTIONS.	0.30
02/10/26	DDW	PREPARE FOR AND ATTEND CONFERENCE REGARDING BAHAMAS PAYMENTS.	0.50
02/13/26	DDW	REVIEW AND RESPOND TO UPDATE REGARDING BAHAMAS PROPERTIES.	0.40
02/16/26	DDW	BRIEF REVIEW OF MULTIPLE COMMUNICATIONS RELATED TO DEATH OF INVESTOR, BAHAMAS, AND OTHER ISSUES.	0.40
02/16/26	DDW	REVIEW PROPOSED BROKERS AND APPROVE RECOMMENDATION; REVIEW AND RESPOND TO COMMUNICATIONS REGARDING SAME.	0.60
02/25/26	DDW	REVIEW OF 2025 TAX FILINGS AND ATTEND MEETING WITH AHUJA & CONSULTANTS REGARDING SAME.	1.40
02/27/26	DDW	CONFERENCE WITH BAHAMAS BANKER (CIBCB) REGARDING ACCOUNTS; DRAFT AND RESPOND TO EMAILS REGARDING SETTING UP ACCOUNT.	1.20
		TOTAL HOURS	4.80
		TOTAL	\$3,240.00



DEBORAH D WILLIAMSON
DEBORAH WILLIAMSON

MATTER #: 122686.000001
INVOICE #: 3724761
PAGE 3

APRIL 30, 2026

BILLING SUMMARY

ID	TIMEKEEPER	HOURS	RATES	AMOUNT
DDW	DEBORAH WILLIAMSON	4.80	675.00	3,240.00
	TOTAL	4.80		\$3,240.00



DEBORAH D WILLIAMSON
DEBORAH WILLIAMSON

MATTER #: 122686.000001
INVOICE #: 3724761
PAGE 4

APRIL 30, 2026

TASK SUMMARY

TASK	TASK DESCRIPTION	HOURS	AMOUNT
B110	CASE ADMINISTRATION	0.70	472.50
B130	ASSET DISPOSITION	1.00	675.00
B210	BUSINESS OPERATIONS	1.70	1,147.50
B240	TAX ISSUES	1.40	945.00
	TOTAL	4.80	3,240.00



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

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

DUE UPON RECEIPT

APRIL 30, 2026
MATTER #: 122686.000001
INVOICE #: 3731164

FOR PROFESSIONAL SERVICES RENDERED

RE: RECEIVER'S TIME

FEES	\$	2,497.50
INVOICE TOTAL	\$	2,497.50



DEBORAH D WILLIAMSON
 DEBORAH WILLIAMSON

MATTER #: 122686.000001
 INVOICE #: 3731164
 PAGE 2

APRIL 30, 2026

RE: RECEIVER'S TIME

DATE	ID	DESCRIPTION	HOURS
03/02/26	DDW	REVIEW OF INFORMATION FROM MR. UNDERWOOD REGARDING STATUS OF GAS SALES AND OTHER ISSUES; DRAFT AND RESPOND TO EMAILS WITH MR. JONES REGARDING SAME.	1.10
03/05/26	DDW	CONFERENCES REGARDING BAHAMAS BANK ACCOUNT.	0.40
03/05/26	DDW	REVIEW OF INFORMATION FROM MR. UNDERWOOD REGARDING POTENTIAL CLAIMS.	0.40
03/10/26	DDW	PREPARE FOR AND ATTEND HEARING.	0.40
03/17/26	DDW	APPROVE WIRE TO BAHAMAS; CONFERENCE REGARDING DISCLOSURE OF INFORMATION.	0.60
03/25/26	DDW	REVIEW AND RESPOND TO VARIOUS EMAILS REGARDING INSURANCE.	0.40
03/27/26	DDW	REVIEW OF UPDATE REGARDING BAHAMAS PROPERTIES; DRAFT AND RESPOND TO EMAILS REGARDING SAME.	0.40
TOTAL HOURS			3.70
TOTAL			\$2,497.50



DEBORAH D WILLIAMSON
DEBORAH WILLIAMSON

MATTER #: 122686.000001
INVOICE #: 3731164
PAGE 3

APRIL 30, 2026

BILLING SUMMARY

ID	TIMEKEEPER	HOURS	RATES	AMOUNT
DDW	DEBORAH WILLIAMSON	3.70	675.00	2,497.50
	TOTAL	3.70		\$2,497.50



DEBORAH D WILLIAMSON
DEBORAH WILLIAMSON

MATTER #: 122686.000001
INVOICE #: 3731164
PAGE 4

APRIL 30, 2026

TASK SUMMARY

TASK	TASK DESCRIPTION	HOURS	AMOUNT
B110	CASE ADMINISTRATION	0.40	270.00
B130	ASSET DISPOSITION	0.40	270.00
B210	BUSINESS OPERATIONS	2.90	1,957.50
	TOTAL	3.70	2,497.50



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

DUE UPON RECEIPT

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

APRIL 30, 2026
MATTER #: 122686.000002
INVOICE #: 3718742

FOR PROFESSIONAL SERVICES RENDERED

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

FEES	\$	7,963.50
DISBURSEMENTS		1,778.71
INVOICE TOTAL	\$	9,742.21



DEBORAH D WILLIAMSON
DEBORAH WILLIAMSON

MATTER #: 122686.000002
INVOICE #: 3718742
PAGE 2

APRIL 30, 2026

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

DATE	ID	DESCRIPTION	HOURS
01/05/26	DNR	REVIEW AND RESPOND TO INVESTOR INQUIRIES; CORRESPONDENCE WITH OIL AND GAS ROYALTY OWNER REGARDING PRODUCTION AND PAYMENT STATUS.	0.40
01/05/26	DNR	RECEIVE AND REVIEW FARMEE'S UPDATE; CORRESPONDENCE TO OIL AND GAS COUNSEL REGARDING SAME; RECEIVE AND REVIEW BANK STATEMENTS FOR DECEMBER 2025; SEND TO AHUJA & CONSULTANTS; REVIEW AND PROCESS RECEIVER'S MAIL.	0.90
01/06/26	DNR	CORRESPONDENCE WITH ROYALTY OWNER REGARDING NOTICE OF ABANDONMENT AND WICHITA COUNTY PROPERTIES OF LEADING EDGE.	0.30
01/07/26	DADO	REVIEW AND RESPOND TO INVESTOR INQUIRY.	0.30
01/08/26	DNR	CORRESPONDENCE WITH RECEIVER REGARDING REGISTERED AGENTS AND TERMINATION OF ENTITIES.	0.20
01/08/26	DNR	CORRESPONDENCE WITH PWC REGARDING BAHAMIAN BANK ACCOUNT CERTIFICATION FORMS; PROCESS SAME.	0.40
01/08/26	DNR	PREPARE AND SEND PACKAGE TO HIGGS & JOHNSON REGARDING CERTIFIED COPIES OF REAL PROPERTY SALE PROCEDURE PLEADINGS FOR BAHAMAS PROPERTIES.	0.20
01/09/26	DNR	RECEIVE AND RESPOND TO INVESTOR INQUIRIES; CORRESPONDENCE WITH RECEIVER REGARDING INVESTOR INQUIRY AND RESPONSE THERETO.	0.60
01/10/26	DNR	CORRESPONDENCE WITH OIL AND GAS COUNSEL REGARDING FARMEE UPDATE AND FARMOUT AGREEMENT ITEMS.	0.20
01/12/26	DNR	CORRESPONDENCE WITH STRETTO REGARDING LETTER TO INVESTORS RECEIVING DISTRIBUTIONS IN 2025 AND CORRESPONDENCE TO SAME BASED ON PRIOR PROTOCOL FOR PRIOR DISTRIBUTIONS; REVIEW AND APPROVE CORRESPONDENCE TO INVESTORS WITH 2025 DISTRIBUTIONS.	0.50
01/12/26	DNR	CORRESPONDENCE WITH AHUJA & CONSULTANTS REGARDING DECEMBER 2025 BANK STATEMENTS; RECEIVE AND PROCESS RECEIVER'S MAIL.	0.40
01/12/26	DADO	EMAIL CORRESPONDENCE WITH MS. BEHREND'S AND STRETTO REGARDING 1099 LETTER TO DEBT INVESTORS; REVISE 1099 LETTER TO DEBT INVESTORS AND EMAIL CORRESPONDENCE WITH MS. BEHREND'S REGARDING DRAFT OF THE SAME.	0.20
01/12/26	DADO	MULTIPLE EMAIL CORRESPONDENCE WITH BENEFICIARIES TO DECEASED INVESTOR.	0.50
01/13/26	DNR	RECEIVE AND REVIEW IBC BANK ACCOUNT ANALYSIS; SEND TO AHUJA & CONSULTANTS.	0.20



DEBORAH D WILLIAMSON
DEBORAH WILLIAMSON

MATTER #: 122686.000002
INVOICE #: 3718742
PAGE 3

APRIL 30, 2026

DATE	ID	DESCRIPTION	HOURS
01/14/26	DNR	CORRESPONDENCE WITH PWC REGARDING PROPERTY REPAIR STATUS AND BANK ACCOUNT ITEMS.	0.20
01/14/26	DNR	CORRESPONDENCE WITH OIL AND GAS VENDOR REGARDING LACK OF AUTHORITY TO EXECUTE DOCUMENTS REGARDING ABANDONED PROPERTIES; REVIEW AND RESPOND TO INVESTOR INQUIRIES.	0.40
01/15/26	DNR	CORRESPONDENCE WITH AHUJA & CONSULTANTS REGARDING TAX ALLOCATIONS CALL.	0.20
01/19/26	DNR	CORRESPONDENCE WITH AHUJA & CONSULTANTS REGARDING TAX ALLOCATION AND DISTRIBUTION STATUS ITEMS.	0.30
01/19/26	DNR	CALL WITH RECEIVER AND AHUJA & CONSULTANTS REGARDING TAX ALLOCATION AND EXPENSE ITEMS; CORRESPONDENCE TO RECEIVER REGARDING TAX RETURN PREPARATION ITEMS.	0.80
01/19/26	DNR	REVIEW EMAIL FROM INVESTOR TO RECEIVER.	0.10
01/20/26	DNR	RECEIVE AND REVIEW APOSTILLED AFFIDAVIT OF RECEIVER FROM TX SECRETARY OF STATE; PREPARE AND SEND TO HIGGS & JOHNSON FOR FILING IN BAHAMAS; CORRESPONDENCE TO HIGGS & JOHNSON REGARDING SAME.	0.40
01/20/26	DNR	CORRESPONDENCE WITH INVESTOR REGARDING INQUIRY ON TAX DOCUMENTATION; CORRESPONDENCE WITH RAILROAD COMMISSION OF TEXAS'S COUNSEL REGARDING REMAINING ITEMS IN RECEIVERSHIP CASE AND NEW OPERATOR'S REQUEST FOR EXECUTION OF DOCUMENTS BY RECEIVER.	0.60
01/20/26	DADO	EMAIL CORRESPONDENCE WITH COUNSEL TO TRUST OF DECEASED INVESTOR REGARDING NEW W-9 AND DISTRIBUTION'S TO THE TRUST; EMAIL CORRESPONDENCE WITH STRETTO REGARDING CONTACT INFORMATION FOR COUNSEL TO DECEASED INVESTOR'S TRUST.	0.50
01/21/26	DNR	CORRESPONDENCE WITH STRETTO REGARDING LETTER TO INVESTORS REGARDING DISTRIBUTIONS RECEIVED AND NO TAX DOCUMENTATION ISSUED BY RECEIVER.	0.20
01/21/26	DADO	REVIEW AND RESPOND TO INVESTOR INQUIRIES.	0.50
01/21/26	DADO	FINAL REVIEW OF MATRIX FOR LETTER TO INVESTORS REGARDING 1099 AND EMAIL CORRESPONDENCE TO STRETTO AND MS. BEHREND'S REGARDING THE SAME.	0.20
01/21/26	DADO	EMAIL CORRESPONDENCE WITH PWC REGARDING INFORMATION REQUESTED FOR QUARTERLY REPORT.	0.20
01/22/26	DNR	RECEIVE AND REVIEW EXHIBIT TO QUARTERLY REPORT FROM AHUJA AND CONSULTANTS.	0.20
01/22/26	DADO	CONTINUE TO DRAFT SEVENTEENTH QUARTERLY REPORT.	1.10
01/22/26	DADO	REVIEW OF PWC'S SUMMARY OF WORK FOR 4Q2025.	0.40



DEBORAH D WILLIAMSON
DEBORAH WILLIAMSON

MATTER #: 122686.000002
INVOICE #: 3718742
PAGE 4

APRIL 30, 2026

DATE	ID	DESCRIPTION	HOURS
01/23/26	DADO	CONTINUE DRAFTING 4Q2025 QUARTERLY REPORT.	0.60
01/26/26	DNR	CORRESPONDENCE WITH AHUJA & CONSULTANTS REGARDING ALLOCATION OF EXPENSES FOR RECEIVERSHIP ENTITIES AND ISSUANCE OF 1099S.	0.20
01/26/26	DADO	PHONE CONFERENCE WITH MS. WILLIAMSON REGARDING REVISIONS AND COMMENTS TO THE 4Q2025 QUARTERLY REPORT.	0.40
01/27/26	DNR	CORRESPONDENCE TO HIGGS & JOHNSON REGARDING TAX DOCUMENTATION REQUIRED FROM FIRM FOR RECEIVERSHIP ESTATES' TAX RETURNS AND COMPLIANCE; CALL WITH AHUJA & CONSULTANTS AND DEBORAH D. WILLIAMSON REGARDING ALLOCATION OF EXPENSES AND TAX DOCUMENTATION ITEMS; CORRESPONDENCE WITH AHUJA & CONSULTANTS REGARDING ENTITY ALLOCATION; REVIEW BANK STATEMENTS AND RECEIPTS REPORTS FOR ANSWERING AHUJA & CONSULTANTS ON SAME; CORRESPONDENCE WITH AHUJA & CONSULTANTS REGARDING HIGGS & JOHNSON TAX DOCUMENTATION NEEDED.	1.40
01/27/26	DADO	REVIEW AND RESPOND TO INVESTOR INQUIRIES.	0.70
01/27/26	DNR	CORRESPONDENCE WITH HIGGS & JOHNSON REGARDING FEE INVOICES OUTSTANDING FOR 4Q25 AND PAYMENT OF COURT-AUTHORIZED AMOUNTS FOR 3Q25.	0.20
01/28/26	DNR	CORRESPONDENCE WITH PWC REGARDING IBC BANK DOCUMENTS AND NEW REQUIREMENTS BY BANK TO OPEN ACCOUNT.	0.30
01/28/26	DNR	CORRESPONDENCE WITH HIGGS & JOHNSON REGARDING COURT-APPROVED FEES AND EXPENSES FOR 3Q25 AND DISCREPANCY WITH ALLEGED OUTSTANDING AMOUNTS OWED BY RECEIVER.	0.30
01/28/26	ALAF	ATTEND TO INVESTOR INQUIRIES.	0.10
01/29/26	DNR	RECEIVE AND REVIEW DRAFT 1099S FROM AHUJA & CONSULTANTS; CORRESPONDENCE WITH AHUJA & CONSULTANTS REGARDING SAME AND COMMENTS ON DRAFTS PRIOR TO ISSUANCE; CORRESPONDENCE WITH HIGGS & JOHNSON REGARDING WITHHOLDING STATEMENT AND TAX DOCUMENTS NEEDED FOR RECEIVERSHIP TAX RETURNS; CORRESPONDENCE TO AHUJA & CONSULTANTS REGARDING UPDATE FROM HIGGS & JOHNSON ON SAME.	0.80
01/29/26	ALAF	ATTEND TO INVESTOR INQUIRIES.	0.10
01/30/26	DNR	CORRESPONDENCE WITH RECEIVER AND AHUJA & CONSULTANTS REGARDING 1099 FILINGS AND MICHIGAN REQUIREMENTS FOR SUBMISSION OF SAME TO MICHIGAN RECIPIENTS; CONFIRM AHUJA & CONSULTANT'S RESEARCH ON SAME.	0.60
01/30/26	DNR	REVISE AND CONTINUE DRAFTING 4Q25 QUARTERLY REPORT.	1.00
01/30/26	DADO	REVIEW AND RESPOND TO INVESTOR INQUIRIES.	0.40
TOTAL HOURS			18.70



DEBORAH D WILLIAMSON
DEBORAH WILLIAMSON

MATTER #: 122686.000002
INVOICE #: 3718742
PAGE 5

APRIL 30, 2026

TOTAL

\$7,963.50



DEBORAH D WILLIAMSON
DEBORAH WILLIAMSON

MATTER #: 122686.000002
INVOICE #: 3718742
PAGE 6

APRIL 30, 2026

BILLING SUMMARY

ID	TIMEKEEPER	HOURS	RATES	AMOUNT
DNR	DANIELLE R. BEHREND	12.50	475.00	5,937.50
DADO	DOMINIQUE A. DOUGLAS	6.00	330.00	1,980.00
ALAF	ADRIANNA LAFUENTE	0.20	230.00	46.00
	TOTAL	18.70		\$7,963.50



DEBORAH D WILLIAMSON
DEBORAH WILLIAMSON

MATTER #: 122686.000002
INVOICE #: 3718742
PAGE 7

APRIL 30, 2026

DISBURSEMENTS

DATE	DESCRIPTION	AMOUNT
	FEDERAL EXPRESS/DELIVERY	115.21
	PRINTING EXPENSES	1.10
	RELATIVITY DATA HOSTING	1,660.00
	SCANNING	2.40
	TOTAL DISBURSEMENTS	1,778.71



DEBORAH D WILLIAMSON
DEBORAH WILLIAMSON

MATTER #: 122686.000002
INVOICE #: 3718742
PAGE 8

APRIL 30, 2026

TASK SUMMARY

TASK	TASK DESCRIPTION	HOURS	AMOUNT
B110	CASE ADMINISTRATION	6.80	2,746.00
B130	ASSET DISPOSITION	0.20	95.00
B210	BUSINESS OPERATIONS	2.80	1,330.00
B240	TAX ISSUES	4.30	2,042.50
B310	CLAIMS ADMINISTRATION & OBJECT	0.30	99.00
BT155	STATUS REPORTS	3.90	1,461.00
BT160	LITIGATION CONSULTING	0.40	190.00
	TOTAL	18.70	7,963.50



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

DUE UPON RECEIPT

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

APRIL 30, 2026
MATTER #: 122686.000002
INVOICE #: 3724762

FOR PROFESSIONAL SERVICES RENDERED

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

FEES	\$	9,036.00
DISBURSEMENTS		1,660.00
INVOICE TOTAL	\$	10,696.00



DEBORAH D WILLIAMSON
DEBORAH WILLIAMSON

MATTER #: 122686.000002
INVOICE #: 3724762
PAGE 2

APRIL 30, 2026

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

DATE	ID	DESCRIPTION	HOURS
02/02/26	DNR	RECEIVE AND REVIEW UPDATE FROM FARMEE; CORRESPONDENCE TO OIL AND GAS COUNSEL REGARDING SAME; RECEIVE AND REVIEW BANK STATEMENTS FROM IBC BANK AND WAB; SEND TO AHUJA & CONSULTANTS; RECEIVE AND PROCESS RECEIVER'S MAIL.	0.90
02/02/26	DNR	PROVIDE UPDATE TO SEC COUNSEL REGARDING FARMOUT AGREEMENT; CORRESPONDENCE WITH INVESTOR REGARDING TAX DOCUMENTATION; CORRESPONDENCE WITH ROGER SAHOTA REGARDING REQUEST FOR PUNJABI WRITINGS AND SONGS.	0.50
02/02/26	DNR	CORRESPONDENCE WITH AHUJA & CONSULTANTS REGARDING K-1S AND TIMING OF ISSUANCE; CORRESPONDENCE TO AHUJA & CONSULTANTS REGARDING 1099 RECEIVED BY RECEIVER.	0.30
02/03/26	DNR	CALL AND CORRESPONDENCE WITH PWC REGARDING ADDITIONAL BANK FORMS FOR CIBC TO OPEN ACCOUNT; PREPARE AND PROCESS SAME.	0.60
02/03/26	DNR	CORRESPONDENCE WITH HIGGS & JOHNSON REGARDING AFFIDAVIT OF RECEIVER IN SUPPORT OF PWC'S APPOINTMENT IN THE BAHAMAS AND ISSUES REGARDING APOSTILLES AND NEW DOCUMENT REQUESTS BEFORE FILING SAME IN THE BAHAMAS.	0.40
02/04/26	DNR	CORRESPONDENCE FROM RECEIVER AND AHUJA & CONSULTANTS REGARDING 1099S AND STATE FORM ITEMS.	0.20
02/04/26	DNR	CORRESPONDENCE WITH HIGGS & JOHNSON REGARDING RE-EXECUTION OF RECEIVER'S AFFIDAVIT AND NEW APOSTILLE REQUESTS BEFORE FILING IN THE BAHAMAS; REVISE AFFIDAVIT AND DISCUSS ISSUES AND NEED FOR RE-EXECUTION WITH RECEIVER; PREPARE PACKAGE TO SEND TO TXSOS FOR APOSTILLES ON SAME PRIOR TO FILING IN THE BAHAMAS.	0.80
02/04/26	DNR	CORRESPONDENCE WITH HIGGS & JOHNSON REGARDING TAX DOCUMENTATION NEEDED FOR PREPARATION OF RECEIVERSHIP ESTATES; CORRESPONDENCE TO AHUJA & CONSULTANTS REGARDING SAME.	0.30
02/05/26	DNR	RECEIVE AND PROCESS RECEIVER'S MAIL.	0.50
02/06/26	DNR	CORRESPONDENCE WITH AHUJA & CONSULTANTS REGARDING NEXT STEPS ON TAX DOCUMENTATION ITEMS REGARDING HIGGS & JOHNSON; CORRESPONDENCE WITH AHUJA & CONSULTANTS REGARDING SEC PENALTY AND JUDGMENT STATEMENT ISSUED TO HEARTLAND GROUP VENTURES FOR INCLUSION IN TAX PREPARATION AND FINAL JUDGMENT ENTERED BY JUDGE O'CONNOR AGAINST VENTURES DETAILING AMOUNTS; CORRESPONDENCE TO HIGGS & JOHNSON REGARDING CALL REQUEST ON TAX DOCUMENTATION FOR RECEIVERSHIP TAX RETURN PREPARATION.	0.80



DEBORAH D WILLIAMSON
DEBORAH WILLIAMSON

MATTER #: 122686.000002
INVOICE #: 3724762
PAGE 3

APRIL 30, 2026

DATE	ID	DESCRIPTION	HOURS
02/09/26	DNR	CORRESPONDENCE WITH AHUJA & CONSULTANTS REGARDING QUESTIONS ON 4Q25 INVOICE AND REQUEST FOR CONSIDERATION OF ADDITIONAL DEDUCTION.	0.20
02/09/26	DNR	CALL WITH AHUJA & CONSULTANTS REGARDING TAX DOCUMENTATION REQUIRED FROM HIGGS & JOHNSON TO PREPARE RECEIVERSHIP TAX RETURNS.	0.20
02/09/26	DNR	REVIEW AND RESPOND TO INVESTOR INQUIRIES; CORRESPONDENCE WITH RECEIVER ON RESPONSE TO ONE SET OF INQUIRIES.	0.60
02/10/26	DNR	CORRESPONDENCES TO PWC REGARDING REQUESTING UPDATES ON BAHAMAS PROPERTIES AND SALE PROCESS AND INQUIRY FROM INTERESTED PURCHASER.	0.30
02/10/26	DNR	RECEIVE AND REVIEW INVESTOR INQUIRIES; CORRESPONDENCE WITH RECEIVER REGARDING RESPONSE TO SAME; REVIEW CORRESPONDENCE FROM INTERESTED PURCHASER IN ONE BAHAMAS PROPERTY.	0.50
02/10/26	DNR	REVIEW RESEARCH FROM AHUJA & CONSULTANTS REGARDING TAX DOCUMENTATION REQUIRED FROM HIGGS & JOHNSON; CALL WITH AHUJA & CONSULTANTS, HIGGS & JOHNSON, AND RECEIVER REGARDING SAME AND IMPACT ON RECEIVERSHIP ESTATE RETURNS.	0.50
02/10/26	DADO	EMAIL CORRESPONDENCE WITH POTENTIAL INTERESTED BUYER FOR BAHAMAS PROPERTIES; EMAIL CORRESPONDENCE TO MS. WILLIAMSON, MS. RUSHING BEHREND, AND PWC REGARDING THE SAME.	0.20
02/10/26	DADO	REVIEW AND RESPOND TO INVESTOR INQUIRIES.	0.20
02/10/26	DADO	EMAIL CORRESPONDENCE TO MS. BEHREND, MS. WILLIAMSON, PWC TEAM, AND HIGGS & JOHNSON TEAM REGARDING CORRESPONDENCE RECEIVED FROM INTERESTED BUYER FOR BAHAMAS PROPERTIES; DRAFT EMAIL RESPONSE TO INTERESTED BUYER.	0.30
02/10/26	DADO	REVIEW AND RESPOND TO INVESTOR INQUIRY.	0.30
02/12/26	DNR	CORRESPONDENCE WITH AHUJA & CONSULTANTS REGARDING NEGOTIATIONS OF REDUCTIONS IN INVOICE FOR 4Q25.	0.20
02/12/26	DNR	RECEIVE AND PROCESS RECEIVER'S MAIL; RECEIVE AND REVIEW IBC BANK ACCOUNT ANALYSIS STATEMENT; SEND TO AHUJA & CONSULTANTS.	0.60
02/12/26	DNR	CORRESPONDENCE FROM PWC REGARDING STATUS OF BROKER PROPOSALS.	0.10
02/12/26	DADO	EMAIL CORRESPONDENCE WITH ACCOUNTANT REGARDING VOID CHECK TO CALIFORNIA REGISTERED AGENT.	0.20
02/13/26	DNR	RECEIVE AND REVIEW NUMEROUS PIECES OF MAIL FROM RAILROAD COMMISSION.	0.40
02/13/26	DADO	REVIEW AND RESPOND TO INVESTOR INQUIRIES.	0.30



DEBORAH D WILLIAMSON
DEBORAH WILLIAMSON

MATTER #: 122686.000002
INVOICE #: 3724762
PAGE 4

APRIL 30, 2026

DATE	ID	DESCRIPTION	HOURS
02/16/26	DNR	CORRESPONDENCE WITH HIGGS & JOHNSON REGARDING REAL ESTATE SALE PROCESS FOR BAHAMAS PROPERTIES AND NEXT STEPS ON SAME; CORRESPONDENCE WITH RECEIVER REGARDING PROPOSALS ON BROKERS; REVIEW MATERIALS SUBMITTED BY PWC REGARDING SAME; CORRESPONDENCE WITH PWC REGARDING SELECTION OF BROKER AND NEXT STEPS FOR SALE PROCESS, INCLUDING ISSUES REGARDING PROPERTY TAXES AND CONVEYANCE DOCUMENTS.	1.40
02/16/26	DNR	REVIEW AND RESPOND TO INVESTORS' INQUIRIES; CALL WITH DOMINIQUE DOUGLAS REGARDING RESPONSE TO SAME AND DOCUMENTATION REQUIRED PRIOR TO DISTRIBUTION.	0.80
02/16/26	DNR	CORRESPONDENCE TO AHUJA & CONSULTANTS REGARDING UPDATING TAX INFORMATION FOR INVESTOR'S K-1.	0.10
02/16/26	DNR	REVIEW AND PROCESS RECEIVER'S MAIL; CORRESPONDENCE TO TXOAG REGARDING RAILROAD COMMISSION LETTER TO RECEIVER AND RESPONSE TO SAME.	0.60
02/16/26	DADO	EMAIL CORRESPONDENCE WITH AHUJA & CONSULTANTS REGARDING REVIEW OF 4Q2025 QUARTERLY REPORT.	0.20
02/16/26	DADO	CONFERENCE WITH MS. BEHREND'S REGARDING INVESTOR INQUIRY; REVIEW AND RESPOND TO INVESTOR INQUIRIES.	0.80
02/17/26	DNR	DRAFT AND SEND CORRESPONDENCE TO SEC COUNSEL REGARDING INVESTOR'S INQUIRY AND GUIDANCE ON RESPONDING TO SAME; REVIEW ORDER SETTING HEARING ON MARCH 10, 2026; DRAFT AND FILE NOTICE OF HEARING AND SERVICE OF COURT ORDER REGARDING SAME; REVIEW AND RESPOND TO INVESTOR INQUIRIES.	1.30
02/17/26	DNR	CORRESPONDENCE WITH DEBORAH D. WILLIAMSON REGARDING STATUS REPORT FOR BAHAMAS PROPERTIES.	0.10
02/18/26	DNR	CORRESPONDENCE FROM SEC COUNSEL REGARDING INVESTOR INQUIRY.	0.10
02/19/26	DNR	CORRESPONDENCE WITH PWC REGARDING BAHAMAS BROKER, CONFLICTS SEARCH ITEMS, AND NEXT STEPS FOR RETENTION; REVIEW DRAFT MLS AGREEMENT FROM BAHAMAS; PROVIDE COMMENTS TO PWC AND REQUEST SEPARATE ENGAGEMENT LETTER THAT WILL CONTROL PURSUANT TO COURT-APPROVED REAL ESTATE PROCEDURES.	0.80
02/19/26	DNR	RECEIVE AND PROCESS RECEIVER'S MAIL.	0.30
02/19/26	DNR	CORRESPONDENCE TO AHUJA & CONSULTANTS REGARDING FRANCHISE ANNUAL REPORTS FOR VENTURES AND CARSON ENTITIES.	0.10
02/20/26	DNR	CORRESPONDENCE WITH AHUJA & CONSULTANTS REGARDING FEDERAL TAX RETURNS AND DRAFT STATUS.	0.20
02/23/26	DNR	CORRESPONDENCE FROM AHUJA & CONSULTANTS REGARDING DRAFT TAX RETURN DOCUMENTATION AND WORKPAPER; CORRESPONDENCE TO	0.20



DEBORAH D WILLIAMSON
DEBORAH WILLIAMSON

MATTER #: 122686.000002
INVOICE #: 3724762
PAGE 5

APRIL 30, 2026

DATE	ID	DESCRIPTION	HOURS
		RECEIVER REGARDING SAME.	
02/23/26	DADO	REVIEW AND RESPOND TO INVESTOR INQUIRIES.	0.40
02/24/26	DNR	CORRESPONDENCE WITH AHUJA & CONSULTANTS AND RECEIVER REGARDING TAX RETURNS.	0.20
02/25/26	DNR	CALL WITH DEBORAH D. WILLIAMSON AND AHUJA & CONSULTANTS REGARDING DRAFT TAX RETURNS FOR 2025 TAX YEAR; CORRESPONDENCE WITH AHUJA & CONSULTANTS REGARDING INVESTOR'S PERSONAL AND FAMILY TRUST INVESTMENTS AND K-1 DOCUMENTATION AFFECTED BY INVESTOR'S DEATH; REVIEW DOCUMENTATION RELATING TO SAME AND CONSIDER IMPACT FOR ISSUANCE OF TAX DOCUMENTATION AND PREPARATION OF K-1S.	1.00
02/25/26	DNR	CORRESPONDENCE WITH DOMINIQUE DOUGLAS REGARDING INVESTOR'S TRUST DOCUMENTATION AND RESIGNATION OF TRUSTEE AGREEMENTS; ANALYZE DOCUMENTATION ON SAME; CORRESPONDENCE WITH PURPORTED ESTATE AND TRUST COUNSEL REGARDING K-1 AND W-9 TAX DOCUMENTATION REQUIRED AND FUTURE DISTRIBUTION ISSUES.	0.70
02/26/26	DADO	CORRESPONDENCE WITH MS. BEHREND'S REGARDING DETAILS FOR STATUS REPORT; EMAIL CORRESPONDENCE TO PWC TEAM REGARDING INFORMATION REQUIRED FOR STATUS REPORT TO THE COURT IN ADVANCE OF HEARING.	0.30
		TOTAL HOURS	20.00
		TOTAL	\$9,036.00



DEBORAH D WILLIAMSON
DEBORAH WILLIAMSON

MATTER #: 122686.000002
INVOICE #: 3724762
PAGE 6

APRIL 30, 2026

BILLING SUMMARY

ID	TIMEKEEPER	HOURS	RATES	AMOUNT
DNR	DANIELLE R. BEHREND	16.80	475.00	7,980.00
DADO	DOMINIQUE A. DOUGLAS	3.20	330.00	1,056.00
	TOTAL	20.00		\$9,036.00



DEBORAH D WILLIAMSON
DEBORAH WILLIAMSON

MATTER #: 122686.000002
INVOICE #: 3724762
PAGE 7

APRIL 30, 2026

DISBURSEMENTS

DATE	DESCRIPTION	AMOUNT
	RELATIVITY DATA HOSTING	1,660.00
	TOTAL DISBURSEMENTS	1,660.00



DEBORAH D WILLIAMSON
DEBORAH WILLIAMSON

MATTER #: 122686.000002
INVOICE #: 3724762
PAGE 8

APRIL 30, 2026

TASK SUMMARY

TASK	TASK DESCRIPTION	HOURS	AMOUNT
B110	CASE ADMINISTRATION	6.90	2,987.50
B130	ASSET DISPOSITION	3.10	1,400.00
B210	BUSINESS OPERATIONS	4.10	1,918.50
B240	TAX ISSUES	4.10	1,947.50
BT155	STATUS REPORTS	0.60	212.50
BT160	LITIGATION CONSULTING	1.20	570.00
	TOTAL	20.00	9,036.00



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

DUE UPON RECEIPT

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

APRIL 30, 2026
MATTER #: 122686.000002
INVOICE #: 3731165

FOR PROFESSIONAL SERVICES RENDERED

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

FEES	\$	10,129.50
DISBURSEMENTS		1,704.56
INVOICE TOTAL	\$	11,834.06



DEBORAH D WILLIAMSON
DEBORAH WILLIAMSON

MATTER #: 122686.000002
INVOICE #: 3731165
PAGE 2

APRIL 30, 2026

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

DATE	ID	DESCRIPTION	HOURS
03/02/26	DNR	CORRESPONDENCE FROM INVESTOR'S SON REGARDING SUCCESSOR TRUSTEE AND DOCUMENTATION SUPPORTING SAME.	0.10
03/02/26	DADO	EMAIL CORRESPONDENCE WITH INVESTOR'S BENEFICIARIES REGARDING DISTRIBUTION AND K-1; REVIEW AND RESPOND TO INVESTOR INQUIRIES.	0.60
03/02/26	DNR	RECEIVE AND REVIEW UPDATE FROM FARMEE; CORRESPONDENCE WITH RECEIVER AND OIL AND GAS COUNSEL ON SAME.	0.40
03/03/26	DNR	CORRESPONDENCE WITH INVESTOR'S COUNSEL AND SUCCESSOR TRUSTEE OF INVESTOR REGARDING TAX DOCUMENTATION AND K-1 REQUESTS.	0.30
03/03/26	DNR	CORRESPONDENCE WITH AHUJA & CONSULTANTS REGARDING TRUST DOCUMENTATION AND UPDATING OF INVESTOR INFORMATION FOR K-1 DOCUMENTS.	0.40
03/03/26	DNR	RECEIVE AND PROCESS RECEIVER'S MAIL.	0.40
03/03/26	DADO	EMAIL CORRESPONDENCE WITH BENEFICIARY TO INVESTOR REGARDING GOING FORWARD ACTION AFTER DEATH OF INVESTOR.	0.30
03/03/26	DADO	EMAIL CORRESPONDENCE TO AHUJA & CONSULTANTS TEAM REGARDING REVISIONS TO K-1 DUE TO INVESTORS DEATH AND TO PROVIDE NEW INFORMATION FOR BENEFICIARIES.	0.20
03/05/26	DNR	REVIEW FILES FOR NOTARIZED PLEADINGS, AFFIDAVITS, AND OTHER SUBMISSIONS TO CIBC AND BAHAMAS COURT; SEND SAME TO RECEIVER.	0.50
03/05/26	DNR	REVIEW AND RESPOND TO INVESTOR AND SEC COUNSEL INQUIRIES.	0.50
03/05/26	DNR	ADDRESS AND RESOLVE ISSUES WITH CIBC CARIBBEAN REGARDING KNOW YOUR CLIENT AND RECEIVER'S DOCUMENTATION SUBMITTED FOR OPENING RECEIVERSHIP BANK ACCOUNT IN BAHAMAS; RECEIVE AND REVIEW BANK STATEMENTS FROM IBC BANK AND WAB; SEND TO AHUJA & CONSULTANTS.	1.00
03/05/26	DNR	CORRESPONDENCE WITH AHUJA & CONSULTANTS REGARDING TAX RETURNS, DISCLOSURES, AND COVER LETTER FOR REVIEW AND FORM 5495 PREPARATION; REVIEW DRAFT 2025 TAX YEAR RETURNS; PREPARE COVER LETTERS FOR SUBMISSION OF RETURNS AND DISCLOSURES FOR 6 RECEIVERSHIP ENTITIES; SEND SAME TO AHUJA & CONSULTANTS.	1.80
03/06/26	DNR	CORRESPONDENCE WITH CIBC CARIBBEAN REGARDING BANK ACCOUNT OPENING AND TIMING OF SAME.	0.20
03/06/26	DNR	CORRESPONDENCE WITH RECEIVER AND AHUJA & CONSULTANTS REGARDING DISCLOSURES FOR 2025 TAX RETURNS; CORRESPONDENCE WITH AHUJA & CONSULTANTS REGARDING FORM 5495 AND PREPARATION REQUEST FOR	0.60



DEBORAH D WILLIAMSON
DEBORAH WILLIAMSON

MATTER #: 122686.000002
INVOICE #: 3731165
PAGE 3

APRIL 30, 2026

DATE	ID	DESCRIPTION	HOURS
		SAME.	
03/08/26	DNR	CORRESPONDENCE WITH PWC REGARDING UPDATE REPORT FOR BAHAMAS PROPERTIES AND REVIEW OF SAME.	0.50
03/08/26	DNR	RECEIVE AND REVIEW CORRESPONDENCE FROM OIL AND GAS COUNSEL REGARDING UPDATE FROM FARMEE.	0.20
03/09/26	DNR	RECEIVE AND PROCESS RECEIVER'S MAIL.	0.30
03/09/26	DNR	PREPARE AND SEND PACKAGE TO WICHITA COUNTY TAX OFFICE REGARDING NOTICE OF ABANDONMENT AND RESPONSE OF RECEIVER REGARDING 2025 TAX STATEMENTS OF LEADING EDGE; CALL WITH AHUJA & CONSULTANTS REGARDING REQUEST FOR FINAL RETURNS; RECEIVE AND REVIEW FINAL RETURNS AND SIGNATURE DOCUMENTS REQUIRED OF RECEIVER; DISCUSS SAME WITH RECEIVER AND PROCESS AND SUBMIT SAME TO AHUJA & CONSULTANTS.	1.00
03/10/26	DNR	RECEIVE AND RESPOND TO INVESTOR INQUIRIES; PREPARE FOR AND APPEAR BEFORE THE HON. HAL R. RAY, JR. AT MARCH 10, 2026 HEARING.	1.10
03/10/26	DNR	CORRESPONDENCE WITH PWC REGARDING UPDATES TO COURT ON BAHAMAS PROPERTIES.	0.30
03/10/26	DNR	CORRESPONDENCE WITH AHUJA & CONSULTANTS REGARDING SIGNED TAX RETURN FORMS OF RECEIVER AND K-1S FOR INVESTORS.	0.40
03/10/26	DNR	PREPARE PAYMENTS FOR RECEIVER'S APPROVAL; PREPARE FOREIGN WIRE FORM FOR RECEIVER'S SIGNATURE.	0.40
03/11/26	DNR	REVIEW AND RESPOND TO INVESTOR INQUIRIES; REVIEW ORDER ENTERED BY COURT APPROVING 4Q25 FEE APPLICATION.	0.40
03/12/26	DNR	REVIEW AND RESPOND TO INVESTOR INQUIRIES.	0.20
03/12/26	DNR	RECEIVE AND PROCESS RECEIVER'S MAIL.	0.30
03/13/26	DNR	RECEIVE AND REVIEW IBC BANK MARCH 2026 ACCOUNT ANALYSIS; SEND TO AHUJA & CONSULTANTS.	0.30
03/16/26	DNR	CORRESPONDENCE WITH AHUJA & CONSULTANTS REGARDING STATUS OF FILING TAX RETURNS AND REQUEST FOR K-1S ELECTRONICALLY TO RESPOND TO INVESTORS; UPDATE RECEIVER ON SAME; RECEIVE CLIENT COPIES OF TAX RETURNS AND K-1 DOCUMENTATION FROM AHUJA & CONSULTANTS.	0.70
03/16/26	DADO	REVIEW AND RESPOND TO INVESTOR INQUIRIES.	0.30
03/16/26	ALAF	ATTEND TO INVESTOR INQUIRIES.	0.20
03/17/26	DNR	CALL WITH INVESTOR REGARDING TAX DOCUMENTATION AND SALE STATUS INQUIRY; REVIEW AND RESPOND TO INVESTOR'S INQUIRIES AND PROVIDE TAX DOCUMENTATION TO SAME AS REQUESTED.	1.40
03/17/26	DNR	PREPARE INTERNATIONAL WIRE FORM AND DISCUSS WITH RECEIVER FOR	0.50



DEBORAH D WILLIAMSON
DEBORAH WILLIAMSON

MATTER #: 122686.000002
INVOICE #: 3731165
PAGE 4

APRIL 30, 2026

DATE	ID	DESCRIPTION	HOURS
		HIGGS & JOHNSON; CORRESPONDENCE WITH WAB REGARDING SAME AND TIMING LOGISTICS FOR WIRE.	
03/18/26	DNR	RECEIVE AND PROCESS RECEIVER'S MAIL; CORRESPONDENCE TO OAG REGARDING RAILROAD COMMISSION OF TEXAS'S RETURNED MAIL AND ISSUES FROM RAILROAD COMMISSION OF TEXAS'S SIDE WITH CHANGE OF ADDRESS FORMS NOT PROCESSED ACCURATELY IN MARCH 2022; CORRESPONDENCE WITH WAB REGARDING INTERNATIONAL WIRE; UPDATE HIGGS & JOHNSON REGARDING SAME.	0.60
03/19/26	DNR	DISCUSS MAIL RECEIVED FROM IRS AND GAS GATHERER WITH RECEIVER; CALL WITH GAS GATHERER GENERAL COUNSEL REGARDING RAILROAD COMMISSION OF TEXAS FORMS REQUESTED FOR FILING BY RECEIVER AND NOTICE OF ABANDONMENT OF SUBJECT PROPERTIES IN 2023 PER COURT ORDER.	0.60
03/20/26	DNR	REVIEW AND RESPOND TO INVESTOR'S INQUIRIES REGARDING TAX DOCUMENTS.	0.20
03/20/26	DNR	CORRESPONDENCE WITH AHUJA & CONSULTANTS REGARDING K-1 MAILINGS AND ITEMS FOR INVESTORS.	0.30
03/23/26	DNR	CORRESPONDENCE TO HIGGS AND JOHNSON REGARDING AFFIDAVIT APOSTILLED BY TXSOS AND LODGING WITH SUPREME COURT.	0.20
03/23/26	DNR	CORRESPONDENCE WITH GAS GATHERER'S GENERAL COUNSEL REGARDING REQUESTED FORMS OF RECEIVER AND NOTICE OF ABANDONMENT RECORDED IN SUTTON COUNTY REGARDING SAME; RECEIVE AND PROCESS RECEIVER'S MAIL.	0.50
03/24/26	DNR	REVIEW AND RESPOND TO INVESTOR INQUIRIES.	0.80
03/24/26	DNR	CORRESPONDENCE WITH RECEIVER REGARDING PROPOSED BROKER'S ENGAGEMENT; REVIEW AND REVISE PROPOSED BROKER'S ENGAGEMENT LETTER AND EDIT MLS AGREEMENT TO CONFORM TO COURT-APPROVED SALE PROCEDURES.	0.20
03/25/26	DNR	CORRESPONDENCE WITH CONTRACT OPERATOR REGARDING INSURANCE RENEWAL AND TIMELINE FROM BANCFIRST ON SAME.	0.40
03/26/26	DNR	CORRESPONDENCE WITH PWC REGARDING STATUS OF OPENING OF BANK ACCOUNT IN BAHAMAS.	0.20
03/26/26	DNR	REVISE ENGAGEMENT LETTER AND MLS AGREEMENT TO CONFORM WITH COURT-APPROVED SALE PROCEDURES FOR BAHAMAS PROPERTIES; CORRESPONDENCE WITH RECEIVER REGARDING SAME.	1.20
03/27/26	DNR	CORRESPONDENCE WITH PWC REGARDING REPAIRS AND ISSUES REGARDING SAME WITH BOTH PROPERTIES AND STATUS OF BANK ACCOUNT IN BAHAMAS.	0.30
03/30/26	DADO	REVIEW AND RESPOND TO INVESTOR INQUIRIES.	0.20



DEBORAH D WILLIAMSON
DEBORAH WILLIAMSON

MATTER #: 122686.000002
INVOICE #: 3731165
PAGE 5

APRIL 30, 2026

DATE	ID	DESCRIPTION	HOURS
03/30/26	DADO	REVIEW TAX AND CLAIM DOCUMENTS AND RESPOND TO INQUIRY FROM BENEFICIARY TO DECEASED INVESTOR.	0.60
		TOTAL HOURS	22.10
		TOTAL	\$10,129.50



DEBORAH D WILLIAMSON
DEBORAH WILLIAMSON

MATTER #: 122686.000002
INVOICE #: 3731165
PAGE 6

APRIL 30, 2026

BILLING SUMMARY

ID	TIMEKEEPER	HOURS	RATES	AMOUNT
DNR	DANIELLE R. BEHREND	19.70	475.00	9,357.50
DADO	DOMINIQUE A. DOUGLAS	2.20	330.00	726.00
ALAF	ADRIANNA LAFUENTE	0.20	230.00	46.00
	TOTAL	22.10		\$10,129.50



DEBORAH D WILLIAMSON
DEBORAH WILLIAMSON

MATTER #: 122686.000002
INVOICE #: 3731165
PAGE 7

APRIL 30, 2026

DISBURSEMENTS

DATE	DESCRIPTION	AMOUNT
	FEDERAL EXPRESS/DELIVERY	44.56
	RELATIVITY DATA HOSTING	1,660.00
	TOTAL DISBURSEMENTS	1,704.56



DEBORAH D WILLIAMSON
DEBORAH WILLIAMSON

MATTER #: 122686.000002
INVOICE #: 3731165
PAGE 8

APRIL 30, 2026

TASK SUMMARY

TASK	TASK DESCRIPTION	HOURS	AMOUNT
B110	CASE ADMINISTRATION	7.20	3,081.00
B130	ASSET DISPOSITION	2.50	1,187.50
B210	BUSINESS OPERATIONS	6.30	2,992.50
B240	TAX ISSUES	5.40	2,536.00
BT160	LITIGATION CONSULTING	0.70	332.50
	TOTAL	22.10	10,129.50

EXHIBIT E-2



Counsel & Attorneys-at-Law

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

VAT INVOICE

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

February 17, 2026
 TIN: 100011726
 Invoice No. 199610
 TAAG

Attn: Danielle Behrends

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

Professional Services

Date	Services	Hours	Amount
01/20/26	TAAG Review email on 20th January, 2026 from Danielle Rushing Behrends regarding the apostilled Affidavit of Deborah in support of application, respond.	0.25	200.00
01/22/26	TAAG Review email on 22nd January, 2026 to Danielle Rushing Behrends regarding Certificate Page not notarized.	0.25	200.00
02/03/26	TAAG Review email on 3rd February, 2026 from Danielle Rushing Behrends.	0.25	200.00
02/04/26	TAAG Review email on 4th February, 2026 from Danielle Rushing Behrends attaching apostilled pages.	0.25	200.00
02/14/26	TAAG Email on Saturday, 14th February, 2026 to Dominique Douglas advising no comments on draft.	0.25	200.00
02/16/26	TAAG Review email on 16th February, 2026 from Danielle Rushing Behrends.	0.25	200.00
02/16/26	TAAG Review email on 16th February, 2026 from Danielle Rushing Behrends attaching Order; review Order and respond.	0.50	400.00

Summary of Services

	Rate	Hours	Amount
TAAG Tara A Archer-Glasgow - Partner	800.00	2.00	1,600.00
Total for Services			\$1,600.00

Sub Total

\$1,600.00

VAT

160.00

Total for Services and Expenses

\$1,760.00

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

\$1,772.16



Counsel & Attorneys-at-Law

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

VAT INVOICE

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

March 30, 2026
 TIN: 100011726
 Invoice No. 200187
 TAAG

Attn: Danielle Behrends

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

Professional Services

Date		Services	Hours	Amount
02/19/26	JMM	General call with PWC Team regarding the sale process, next steps regarding stamping of the Conveyance and securing a VAT waiver;	0.50	300.00
03/23/26	TAAG	Review email on 23rd March, 2026 from Danielle Rushing Behrends attaching apostilled copy of Affidavit in support; respond to the same.	0.50	400.00

Summary of Services

		Rate	Hours	Amount
TAAG	Tara A Archer-Glasgow - Partner	800.00	0.50	400.00
JMM	Ja'Ann M Major - Partner	600.00	0.50	300.00
Total for Services				\$700.00

Sub Total

\$700.00

VAT

70.00

Total for Services and Expenses

\$770.00

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

\$777.19

EXHIBIT E-3



Ahuja & Consultants, Inc.
Certified Public Accountants

Ahuja & Consultants, Inc.

2901 N. Dallas Pkwy
Suite 320
Plano, TX 75093

Invoice # 8239.HL
Invoice Date: 3/31/2026
Due Date: 4/30/2026

Bill To:
Dykema
Attn: Deborah Williamson

Q1 2026 BILLING SUMMARY

TASK	TASK DESCRIPTION	HOURS	AMOUNT
2900	Accounting/Auditing	23.30	\$4,887.00
3900	Tax Services	53.80	\$14,055.50
	Expense Reimbursement		\$474.11

TOTAL **\$19,416.61**



Ahuja & Consultants, Inc.
Certified Public Accountants

Ahuja & Consultants, Inc.

2901 N. Dallas Pkwy
Suite 320
Plano, TX 75093

Invoice # 8239.HL
Invoice Date: 3/31/2026
Due Date: 4/30/2026

Bill To:
Dykema
Attn: Deborah Williamson

Q1 2026 BILLING SUMMARY

ID	TIMEKEEPER	TITLE	HOURS	RATE	AMOUNT
AH	Ammon Hall	Associate	2.80	\$120.00	\$336.00
DS	Divya Shetty	Manager	47.60	\$250.00	\$11,900.00
GN	Geneva Newton	Admin	3.40	\$95.00	\$323.00
JW	Jennifer Wallace	Senior Associate	8.20	\$180.00	\$1,476.00
MA	Madhu Ahuja	Engagement Leader	15.10	\$325.00	\$4,907.50

TOTAL 77.10 \$18,942.50



Ahuja & Consultants, Inc.
 Certified Public Accountants

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

Invoice # 8239.HL
Invoice Date: 3/31/2026
Due Date: 4/30/2026

Bill To:
 Dykema
 Attn: Deborah Williamson

Q1 2026 EXPENSE REIMBURSEMENT

EXPENSE	AMOUNT
ArcoOil Corp 1099-NEC filing charges and postage	\$3.27
Heartland Drilling Fund I LP 1099-NEC filing charges and postage	\$3.27
Carson Oil Field Development Fund II LP 1099-NEC filing charges and postage	\$5.47
Heartland Group Fund III LLC 1099-NEC filing charges and postage	\$5.47
The Heartland Group Ventures 1099-NEC filing charges and postage	\$5.47
Encypher Bastion 1099-NEC filing charges and postage	\$3.27
Mileage for USPS - 4.5 miles	\$3.29
K-1 postage	\$444.60

TOTAL \$474.11



Ahuja & Consultants, Inc.
 Certified Public Accountants

Ahuja & Consultants, Inc.

2901 N. Dallas Pkwy
 Suite 320
 Plano, TX 75093

Invoice # 8239.HL
Invoice Date: 3/31/2026
Due Date: 4/30/2026

Bill To:
 Dykema
 Attn: Deborah Williamson

Date	ID	Description	Task	Hours	Amount
1/13/2026	JW	Accounting for December 2025, data entry and bank account reconciliations	2900	0.70	\$126.00
1/14/2026	DS	Review of books and email the allocation of expenses for Heartland entities	2900	0.80	\$200.00
1/14/2026	JW	Begin preparation of draft Q4 Standard Fund Accounting Report (SFAR)	2900	2.50	\$450.00
1/15/2026	DS	Prepare the 2025 balance sheet from the 2024 tax return for the following entities – ArcoOil Corp, Heartland Drilling Fund I, Heartland Group Fund III, Heartland Group Ventures LLC & Encypher Bastion	3900	2.50	\$625.00
1/15/2026	MA	Review allocation spreadsheet, draft email regarding allocation process and respond to emails	3900	1.50	\$487.50
1/16/2026	DS	Review the Standard Fund Accounting Report (SFAR) for Q4 2025	2900	0.50	\$125.00
1/16/2026	DS	Continue preparing the financials for Heartland entities	3900	2.00	\$500.00
1/16/2026	JW	Complete Standard Fund Accounting Report (SFAR) and start Forms 1099 processing	2900	3.00	\$540.00
1/16/2026	JW	Continue preparing Forms 1099	2900	1.10	\$198.00
1/19/2026	DS	Allocation for Receivership expenses to Heartland entities	2900	4.50	\$1,125.00
1/19/2026	DS	Call with Ms. Behrends, Ms. Ahuja & Ms. Williamson to discuss the apportionment of expenses for Receivership entities	2900	0.60	\$150.00
1/19/2026	DS	Continue reviewing the Standard Fund Accounting Report (SFAR)	2900	0.50	\$125.00
1/19/2026	JW	Update the Q4 Standard Fund Accounting Report (SFAR)	2900	0.40	\$72.00
1/19/2026	MA	Preparation for meeting with Receiver's team and call with Ms. Behrends, Ms. Shetty & Ms. Williamson to discuss the apportionment of expenses for Receivership entities	3900	1.00	\$325.00
1/20/2026	DS	Continue reviewing the Standard Fund Accounting Report (SFAR)	2900	1.00	\$250.00
1/20/2026	DS	Continue allocation for Receivership expenses to Heartland entities	2900	0.50	\$125.00
1/21/2026	DS	Continue allocation for Receivership expenses to Heartland entities. List the process followed to allocate the expenses	2900	1.40	\$350.00
1/21/2026	MA	Review of allocation sheet and Standard Fund Accounting Report (SFAR)	3900	2.00	\$650.00

Date	ID	Description	Task	Hours	Amount
1/27/2026	DS	Prepare the financials for all Heartland entities and review Forms 1099	2900	2.00	\$500.00
1/27/2026	DS	Call with Ms. Behrends, Ms. Ahuja & Ms. Williamson to discuss the apportionment of Receivership entity before proceeding with the preparation of tax returns	2900	0.50	\$125.00
1/27/2026	JW	Continue preparing Forms 1099 allocated by entity	2900	0.50	\$90.00
1/27/2026	MA	Call with Ms. Behrends, Ms. Williamson and Ms. Shetty to review allocation of expenses	3900	0.50	\$162.50
1/29/2026	AH	Efile the Forms 1099 and mail the Forms 1099	2900	0.90	\$108.00
1/30/2026	AH	Continue efilng the Forms 1099 and mailing the Forms 1099	2900	1.90	\$228.00
1/30/2026	DS	Continue preparing the workpapers for Heartland entities	3900	3.50	\$875.00
2/2/2026	DS	Prepare ArcoOil Corp tax return	3900	1.10	\$275.00
2/2/2026	DS	Prepare tax returns for Heartland Drilling Fund I and Carson Oil Field Development Fund II, LP	3900	3.50	\$875.00
2/3/2026	DS	Prepare tax return for Heartland Group Ventures and Heartland Group Fund III	3900	1.80	\$450.00
2/4/2026	DS	Continue preparing tax return for Heartland Group Fund III	3900	1.50	\$375.00
2/5/2026	DS	Review the tax returns and the workpapers	3900	3.20	\$800.00
2/5/2026	DS	Continue preparing tax return	3900	2.00	\$500.00
2/6/2026	MA	Review emails regarding Form 5495, refer to prior year files and respond to email	3900	0.30	\$97.50
2/9/2026	MA	Review questions and call with Ms. Behrends regarding Form W-8 BEN	3900	0.30	\$97.50
2/17/2026	DS	Review cover letter for the tax return	3900	0.20	\$50.00
2/19/2026	DS	Document all workpapers for each entity	3900	1.30	\$325.00
2/19/2026	MA	Review of ArcoOil Corp, Heartland Drilling Fund I, Heartland Group Ventures tax returns along with workpapers	3900	3.00	\$975.00
2/20/2026	DS	Update workpapers, tax returns and download the tax returns	3900	3.50	\$875.00
2/20/2026	MA	Review of Heartland Group Ventures, Carson Oil Field Development Fund II, LP, and Encypher Bastion tax returns	3900	3.00	\$975.00
2/23/2026	DS	Verify the tax returns to the workpapers, update the tax return for recourse liabilities & prepare the profit & loss statement for Barron Petroleum LLC	3900	1.50	\$375.00
2/23/2026	MA	Continue reviewing the workpapers and review of disclosure statements	3900	2.00	\$650.00
2/25/2026	DS	Preparation and call with Ms. Behrends, Ms. Williamson and Ms. Ahuja to discuss the tax return	3900	0.40	\$100.00
2/25/2026	MA	Call with Receiver's team to review tax returns (12 min); draft footnotes and update consolidated workpapers (48 min)	3900	1.00	\$325.00
3/3/2026	DS	Email Ms. Behrends regarding the final queries on the tax return, update the tax return for closing the Edward Troy account, prepare a new K-1 in Heartland Drilling Fund I, and update the address for Carson Oil Field Development Fund II, LP K-1	3900	1.30	\$325.00
3/3/2026	MA	Review K-1 reporting of deceased partner	3900	0.50	\$162.50
3/6/2026	DS	Add the additional disclosure to tax, attached the disclosure, cover letter, and court order, download the tax returns and efile signature forms	3900	4.50	\$1,125.00
3/10/2026	DS	Final review before efilng - all Heartland entities	3900	0.50	\$125.00
3/17/2026	DS	Review the mailing list	3900	0.70	\$175.00

Date	ID	Description	Task	Hours	Amount
3/19/2026	DS	Review the mailing copies of the K-1s	3900	0.30	\$75.00
3/20/2026	GN	Sealed K-1 envelopes, trip to USPS, stamped envelopes, mailed K-1s	3900	3.40	\$323.00

Total \$18,942.50

Balance Due \$19,416.61

NOTE: Total Fees are net of write-off fees of \$2,100.00 primarily related to Q1 Standard Fund Accounting Report (SFAR), Michigan Forms 1099, and Form W-8 BEN.

EXHIBIT E-4

410 Exchange, Ste 100
 Irvine, CA 92602
 855.812.6112

Invoice: 18304
Date: 02/15/2026
Due Date: 03/17/2026
Terms: Net 30

Bill To:
 Heartland

Item	Quantity	Unit Price	Amount
January 2026 Invoice			
Hourly Fees			\$1,101.50
Printing	60	\$0.10	\$6.00
Postage			\$15.60
Envelopes and Packaging – See Noticing Summary for details			\$4.00
TOTAL DUE			\$1,127.10
			THANK YOU.
TOTAL ACCOUNT BALANCE DUE			\$4,897.60

For wire/ACH payments:

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



Case Name: Heartland

Summary of Hourly Fees

Date Range: 01/01/2026 - 01/31/2026

Role	Hours	Rate	Total
Analyst	0.3	\$50.00	\$15.00
Associate II	0.7	\$65.00	\$45.50
Associate III	0.1	\$130.00	\$13.00
Director	2.7	\$195.00	\$526.50
Senior Associate	1.9	\$135.00	\$256.50
Specialized Director	0.1	\$550.00	\$55.00
Specialized Senior Associate	0.4	\$475.00	\$190.00
		Total	\$1,101.50



Case Name: Heartland

Time Detail

Date Range: 01/01/2026 - 01/31/2026

Date	Employee Name	Role	Task	Description	Hours
01/09/2026	Laura Tondreault	Analyst	Case Administration	Prepare and organize general case documents for accuracy and completeness	0.1
01/09/2026	Pete Danpongchareon	Specialized Senior Associate	Case Administration	Review bank data and reconcile account for ledger detail report	0.4
Subtotal 01/09/2026					0.5

Date	Employee Name	Role	Task	Description	Hours
01/12/2026	Robert Saraceni	Director	Case Administration	Draft corr. to Receiver's office regarding letter to investors who received 2025 distributions advising them of 1099 status.	0.1
01/12/2026	Robert Saraceni	Director	Case Administration	Review response email from D. Behrends re 2026 investor 2099 letter, research and draft response.	0.2
Subtotal 01/12/2026					0.3

Date	Employee Name	Role	Task	Description	Hours
01/13/2026	Laura Tondreault	Analyst	Case Administration	Prepare and organize general case documents for accuracy and completeness	0.1
Subtotal 01/13/2026					0.1

Date	Employee Name	Role	Task	Description	Hours
01/21/2026	Daniel Ramirez	Senior Associate	Case Administration	Correspond with R. Saraceni and M. Lopez regarding physical service of 1099 document on 1.23.2026	0.2
01/21/2026	Laura Tondreault	Analyst	Case Administration	Prepare and organize general case documents for accuracy and completeness	0.1
01/21/2026	Robert Saraceni	Director	Case Administration	Review inquiry from D. Douglas regarding checks issued to investor in conservatorship. Research and pull check numbers and forward to TCM group for response.	0.6
01/21/2026	Robert Saraceni	Director	Case Administration	Prepare 2025 1099 letter and mailing list for investors who received a 2025 distribution and forward to D. Behrends for approval.	0.7
01/21/2026	Robert Saraceni	Director	Case Administration	Review and reconcile current check register for Class 4 accounts	0.2
01/21/2026	Robert Saraceni	Director	Case Administration	Review corr. from D. Douglas regarding address update, update addresses of investor	0.5
01/21/2026	Robert Saraceni	Director	Case Administration	Receive confirmation and approval to mail 2025 1099 letter to select investors and coordinate mailing with D. Ramirez	0.1
Subtotal 01/21/2026					2.4

Date	Employee Name	Role	Task	Description	Hours
------	---------------	------	------	-------------	-------

Date	Employee Name	Role	Task	Description	Hours
01/23/2026	Daniel Ramirez	Senior Associate	Case Administration	Coordinate physical service of 1099 Notice on 1.23.26	0.9
01/23/2026	Myles Lopez	Associate	Case Administration	Prep 1099 Letter Mailing List (1.23.2026) with D. Ramirez.	0.4
01/23/2026	Ricky Quang	Associate	Case Administration	Generate service of Heartland_1099 Mailing 1.23.26 mailing including printing and fulfillment	0.2
Subtotal 01/23/2026					1.5

Date	Employee Name	Role	Task	Description	Hours
01/26/2026	Charles Wheeler	Associate	Case Administration	Review of mailing details, including image counts, party lists, and postage verification	0.1
01/26/2026	Daniel Ramirez	Senior Associate	Case Administration	Prepare redacted and unredacted certificate of service for Known Investor Letter on 1.26.26	0.8
01/26/2026	Jenice Alduenda	Specialized Director	Case Administration	Correspondence re: 1099 production services	0.1
01/26/2026	Robert Saraceni	Director	Case Administration	Draft corr. to D. Douglas confirming mailing of 2025 1099 letter to known investors who received a 2025 distribution and request COS from mailing team	0.2
01/26/2026	Robert Saraceni	Director	Case Administration	Review and approve COS for 1.23.2026 Investor 1099 letter	0.1
Subtotal 01/26/2026					1.3

Date	Employee Name	Role	Task	Description	Hours
01/29/2026	Naomi Rodriguez	Associate	Case Administration	1099 mailing - Review of mailing details, including image counts, party lists, and postage verification	0.1
Subtotal 01/29/2026					0.1

Total 01/01/2026 - 01/31/2026 6.2



Noticing Detail

Date of Service	Document(s) or Mailing Description	Number of Recipients	Method(s) of Service
1/23/2026	Heartland_1099 Mailing 1.23.26	20	First Class Mail

410 Exchange, Ste 100
Irvine, CA 92602
855.812.6112

Invoice: 18938
Date: 03/15/2026
Due Date: 03/15/2026
Terms:

Bill To:
Heartland

Item	Quantity	Unit Price	Amount
February 2026 Invoice Hourly Fees			\$178.50
TOTAL DUE			\$178.50
			THANK YOU.
TOTAL ACCOUNT BALANCE DUE			\$1,305.60

[Click Here to Pay Now](#)

For wire/ACH payments:

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



Case Name: Heartland

Summary of Hourly Fees

Date Range: 02/01/2026 - 02/28/2026

Role	Hours	Rate	Total
Analyst II	0.2	\$40.00	\$8.00
Analyst III	0.3	\$50.00	\$15.00
Associate	0.1	\$130.00	\$13.00
Specialized Senior Associate	0.3	\$475.00	\$142.50
		Total	\$178.50



Case Name: Heartland

Time Detail

Date Range: 02/01/2026 - 02/28/2026

Date	Employee Name	Role	Task	Description	Hours
02/02/2026	Alberto Chachagua	Associate	Case Administration	Administrative quality control review of submitted mailings for accuracy and completeness	0.1
02/02/2026	Laura Tondreault	Analyst	Case Administration	Prepare and organize general case documents for accuracy and completeness	0.1
Subtotal 02/02/2026					0.2
Date	Employee Name	Role	Task	Description	Hours
02/04/2026	Pete Danpongchareon	Specialized Senior Associate	Case Administration	Review bank data and reconcile account for ledger detail report	0.3
Subtotal 02/04/2026					0.3
Date	Employee Name	Role	Task	Description	Hours
02/10/2026	Staphany Alcantar	Analyst	Case Administration	Sort and manage incoming mail re: various mailings	0.1
Subtotal 02/10/2026					0.1
Date	Employee Name	Role	Task	Description	Hours
02/11/2026	Staphany Alcantar	Analyst	Case Administration	Capture and track undeliverable mail images	0.1
Subtotal 02/11/2026					0.1
Date	Employee Name	Role	Task	Description	Hours
02/17/2026	Laura Tondreault	Analyst	Case Administration	Prepare and organize general case documents for accuracy and completeness	0.1
Subtotal 02/17/2026					0.1
Date	Employee Name	Role	Task	Description	Hours
02/24/2026	Laura Tondreault	Analyst	Case Administration	Prepare and organize general case documents for accuracy and completeness	0.1
Subtotal 02/24/2026					0.1
Total 02/01/2026 - 02/28/2026					0.9

EXHIBIT F-1

Deborah D. Williamson

Member



Contact

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

Overview

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

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

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

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

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

Areas of client focus

Practices

Government Reorganization and Restructuring
Restructuring and Bankruptcy

Industries

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

Experience

Receivership

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

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

Litigation

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

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

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

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

Bankruptcy and Restructuring — Energy

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

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

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

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

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

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

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

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

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

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

Bankruptcy and Restructuring — Retail

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

The Firm was counsel to the secured lender.

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

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

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

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

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

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

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

Cross Border

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

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

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

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

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

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

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

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

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

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

Asset Acquisition

Dee Howard Aircraft

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

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

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

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

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

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

Plan Mediator

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

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

Education

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

Bar Admissions

- Texas, 1982

Professional Recognition

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

Affiliations

Professional

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

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

Community

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

EXHIBIT F-2

Danielle Rushing Behrends

Member



Contact

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.

Education

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

Bar Admissions

- Texas, 2016

Professional Recognition

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

Affiliations

Professional

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

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

Community

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

Dominique Douglas

Associate



Contact

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

Overview

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

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

Prior to joining Dykema, Dominique served as a Judicial Law Clerk to the Honorable Scott M. Grossman in the United States Bankruptcy Court for the Southern District of Florida, where she demonstrated her passion for commercial transactions and corporate bankruptcy.

During law school, Dominique served as the Online Notes and Articles Editor for the *Mississippi Sports Law Review*. Her article *Mission Impossible: Protecting Our Rich History While Fighting for Bowl Game Eligibility* is published in the *Houston Business Law and Tax Journal*. Dominique was a member and Invitational Cup Chair of the University of Mississippi Negotiation and Arbitration Board. In addition, she interned with the Honorable Donald L. Graham in the United States District Court for the Southern District of Florida.

Credentials

Education

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

Areas of client focus

Practices

Corporate and Finance
Restructuring and Bankruptcy

Industries

Loan Workouts, Restructuring,
and Bankruptcy

- Howard University, B.A., 2018

Bar Admissions

- Alabama
- Texas

Affiliations

Professional

- National Conference of Bankruptcy Judges (NCBJ) Blackshear Presidential Fellow for 2025
- National Conference of Bankruptcy Judge's (NCBJ) annual Next Generation Program 2025
- International Women's Insolvency & Restructuring Confederation (IWIRC), Member
- American Bankruptcy Institute, Member
- State Bar of Texas, Bankruptcy Section's Young Lawyers Committee, Professional Education Liaison
- Larry E. Kelly Bankruptcy American Inn of Court, Member

Adrianna Lafuente
Litigation, Commercial
Dallas, TX
4-6446

ALafuente@dykema.com

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

Education:

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

Experience:

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

Technology Proficiencies:

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

EXHIBIT F-3



TARA A. ARCHER-GLASGOW

PARTNER

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

Chambers Global 2023

tarcher@higgsjohnson.com

T: +1 242 502 5200

F: +1 242 502 5250

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

Higgs & Johnson

Ocean Centre, Montagu Foreshore

East Bay Street

P O Box N3247

Nassau, The Bahamas



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

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

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

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

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

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

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

PRACTICE AREAS

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

EDUCATION

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

EXECUTIVE TRAINING

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

BAR ADMISSIONS

- Bahamas, 1998
- England and Wales, 1998

PROFESSIONAL MEMBERSHIPS

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

LANGUAGES

- English
- Spanish (conversational)

RECOGNITION

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

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



PUBLICATIONS

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

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

THE BAHAMAS ■ higgsjohnson.com



JA'ANN M. MAJOR

PARTNER

*Ja'Ann Major has a broad practice across the real estate space.
Legal 500 Caribbean 2025*

jmajor@higgsjohnson.com

T: +1 242 502 5200

F: +1 242 502 5250

<https://www.linkedin.com/in/ja-ann-major-4a76778a/>

Higgs & Johnson

Ocean Centre, Montagu Foreshore

East Bay Street

P O Box N3247

Nassau, The Bahamas



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

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

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

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

PRACTICE AREAS

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

EDUCATION

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

BAR ADMISSIONS

- England and Wales, 2008
- Bahamas, 2008

PROFESSIONAL MEMBERSHIPS

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

PUBLICATIONS

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

RECOGNITION

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



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

EXHIBIT F-4



Madhu Ahuja, CPA, ABV, CVA, CFE

President

Ahuja & Clark, PLLC

mahuja@ahujaclark.com

(469) 467-4660

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

EDUCATION

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

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

CERTIFICATIONS

Certified Public Accountant (CPA), Texas

Accredited in Business Valuation (ABV)

Certified Valuation Analyst (CVA)

Certified Fraud Examiner (CFE)

PROFESSIONAL EXPERIENCE

Ahuja & Clark, PLLC

PricewaterhouseCoopers, LLP

2003 - Present

1996 - 2002

SERVICE EXPERTISE

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



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

PROFESSIONAL MEMBERSHIPS

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



Carolyn Bremer, CPA

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

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

EDUCATION

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

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

CERTIFICATIONS

Certified Public Accountant (CPA), Texas, Virginia

PROFESSIONAL EXPERIENCE

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

SERVICE EXPERTISE

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



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

PROFESSIONAL MEMBERSHIPS

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

REPRESENTATIVE PROJECTS

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



bank in U.S. history.

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



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



Ahuja & Consultants, Inc.

Certified Public Accountants

Ahuja & Consultants Staff Supporting Fee Application

Divya Shetty, CPA

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

Jennifer Wallace

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

Ammon Hall

Ammon will serve as accounting support for this engagement. He specializes in accounting and bookkeeping and has 4 years of experience. He has a bachelors degree in accounting and is a CPA candidate.

Geneva Newton

Geneva provides administrative support for this engagement. She has over 11 years of experience of administrative work including a number of years as an executive administrative assistant. She is proficient at using MS Office suite along with G Suite.

EXHIBIT F-5

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.

Staphany Alcantar

In her role as an Intake Specialist in Operations, Staphany is responsible for review and input of incoming claims, processing, scanning and uploading claims to the case management system.

Jenice Alduenda

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

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.

Pete Danpongchareon

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

Myles Lopez

In his role as Associate, Myles' responsibilities include review and response to incoming creditor inquiries, preparation and coordination of physical mailings and email campaigns, and maintenance of claims registers and websites.

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.

Daniel Ramirez

In his role as a Senior Associate, Daniel's responsibilities include website set-up and maintenance, claims review and register preparation, coordination of physical mailings and email campaigns, set-up and maintenance of client databases, and coordination of call centers for Receiverships. He also maintains and tracks settlements for preference actions.

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.

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.

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.