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

UNITED STATES SECURITIES AND EXCHANGE COMMISSION,	§	
	§	
Plaintiff,	§	
	§	
v.	§	
	§	
THE HEARTLAND GROUP VENTURES, LLC; HEARTLAND PRODUCTION AND RECOVERY LLC; HEARTLAND PRODUCTION AND RECOVERY FUND LLC; HEARTLAND PRODUCTION AND RECOVERY FUND II LLC; THE HEARTLAND GROUP FUND III, LLC; HEARTLAND DRILLING FUND I, LP; CARSON OIL FIELD DEVELOPMENT FUND II, LP; ALTERNATIVE OFFICE SOLUTIONS, LLC; ARCOOIL CORP.; BARRON PETROLEUM LLC; JAMES IKEY; JOHN MURATORE; THOMAS BRAD PEARSEY; MANJIT SINGH (AKA ROGER) SAHOTA; and RUSTIN BRUNSON,	§	**No. 4-21CV-1310-O-BP**
	§	
Defendants,	§	
	§	
and	§	
	§	
DODSON PRAIRIE OIL & GAS LLC; PANTHER CITY ENERGY LLC; MURATORE FINANCIAL SERVICES, INC.; BRIDY IKEY; ENCYPHER BASTION, LLC; IGROUP ENTERPRISES LLC; HARPRIT SAHOTA; MONROSE SAHOTA; SUNNY SAHOTA; BARRON ENERGY CORPORATION; DALLAS RESOURCES INC.; LEADING EDGE ENERGY, LLC; SAHOTA CAPITAL LLC; and 1178137 B.C. LTD.,	§	
	§	
Relief Defendants.	§	
	§	
	§	

RECEIVER'S FEE APPLICATION FOR SERVICES PERFORMED BETWEEN JULY 1, 2026 AND SEPTEMBER 30, 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] (the "H&J Employment Order") approving the *Expedited Application to Employ Higgs & Johnson as Bahamian Counsel to Receiver Effective as of March 7, 2025* [ECF No. 709] Deborah D. Williamson, in her capacity as the Court-appointed Receiver (the "Receiver") for the Receivership Parties (as defined in the *Order Appointing Receiver* [ECF No. 17] (the "Receivership Order"))[1] and receivership estates (collectively, the "Receivership Estates") in the above-captioned case (the "Case" or the "Receivership"), hereby submits this *Receiver's Fee Application for Services Performed Between July 1, 2026 and September 30, 2026, and Brief in Support* (the "Application") of Deborah D. Williamson, as Receiver, Dykema Gossett PLLC ("Dykema"), Ahuja & Clark, PLLC n/k/a Ahuja & Consultants, Inc. ("Ahuja"), Stretto, Inc. ("Stretto"), and Higgs & Johnson ("H&J"). 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 Twentieth Report (as defined herein).

I. OVERVIEW

1. As more fully detailed in the *Receiver's Twentieth Quarterly Report for Receivership Estates (July 1, 2026 – September 30, 2026)* [ECF No. 860] (the "Twentieth Report"), the Receiver's primary focus was the marketing and sale of two (2) pieces of real property located on Cat Island in the Commonwealth of the Bahamas (the "Bahamas Properties") for sale.

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 $6,217.80, including time spent by the Receiver and by Dykema attorneys during the Application Period.

5. At the beginning of the third quarter of 2026, the Receiver had $1,161,289.13 on deposit. At the end of the second quarter of 2026, the amount on deposit was $1,181,094.13 after issuance of Court-approved distributions and payments of operating expenses and Court-approved fees and expenses. As of the filing of this Application (November 13, 2026), $1,149,672.42 is in the Receivership bank accounts.

II. RELIEF REQUESTED

6. This Application seeks authorization from the Court to pay on an interim basis fees and expenses for professional services performed from July 1, 2026 through September 30, 2026 (the "Application Period"), by the Receiver in the amount of $4,927.50 for fees; Dykema, as lead counsel to the Receiver, in the amount of $25,221.20 for fees and in the amount of $3,492.90 for

expenses; H&J, as Bahamian counsel to the Receiver, in the amount of B$24,743.75 for fees, in the amount of B$2,474.38 for the 10% Value Added Tax ("VAT"), and in the amount of B$440.00 for expenses (and associated B$44.00 for the 10% VAT), totaling B$27.702.13; Ahuja, as tax and forensic accountants to the Receiver, in the amount of $1,222.00 for fees; and Stretto, as claims and disbursement agent to the Receiver, in the amount of $8,785.75 for fees and in the amount of $5.54 for expenses. The Receiver respectfully requests this Court enter the proposed order attached hereto as **Exhibit B**, approving this Application on an interim basis and authorizing the Receiver to pay outstanding amounts approved thereunder.

7. The Receivership Order at ¶ 62 requires that the "Receiver and Retained Personnel shall apply to the Court for compensation and expense reimbursement from the Receivership Estates" within forty-five (45) days of the end of each calendar quarter. Thus, this Application covers July 1, 2026 through September 30, 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, H&J, 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, 821, 839. Through the first quarter of 2026, the Receiver, Dykema, Ahuja, and Stretto have been paid on an interim basis for services performed on behalf of the Receiver in this Case, all to the extent authorized by this Court. *See generally* ECF Nos. 163, 216, 259, 265, 290, 348, 372, 407, 439, 460, 554, 620, 712, 747, 793, 804, 816, 832, 847. 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]

[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,

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].

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]

$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.

22. On July 3, 2025, the Receiver filed her *Expedited Application to Employ PricewaterhouseCoopers 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], *Receiver's Nineteenth Quarterly Report for Receivership Estates* [ECF No. 838], and the Twentieth 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, or other documents; assisting PwC with insurance and maintenance of 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 and reporting for the Receivership Parties.

28. Stretto's services rendered during the Application Period included preparing and revising investor and non-investor matrices, issuing late investor distributions, 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 and assistance related to the Receiver's continuing obligations in the Supreme Court of The Bahamas in The Commonwealth of The Bahamas.

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 54.90 hours on this Case during the Application Period. At Dykema's discounted hourly rates and after other voluntary reductions, Dykema's fees for the Application Period total $25,221.20 and expenses incurred in connection with services performed on behalf of the Receiver during the Application Period total $3,492.90.[3]

31. The Receiver expended an aggregate of 7.30 hours on this Case during the Application Period. The Receiver's fees for the Application Period total $4,927.50.

32. H&J expended an aggregate of 43.75 hours on this Case during the Application Period. H&J's fees for the Application Period total B$24,743.75, in addition to B$2,474.38 for the 10% VAT. H&J's expenses for the Application Period total B$440.00, in addition to B$44.00 for the 10% VAT. H&J's total compensation requested during this Application Period is B$27,702.13.

33. Ahuja expended an aggregate of 6.40 hours on this Case during the Application Period. Ahuja's fees for the Application Period total $1,222.00.

34. Stretto expended an aggregate of 20.40 hours on this Case during the Application Period. Stretto's fees for the Application Period total $8,785.75 and expenses incurred in connection with services performed on behalf of the Receiver during the Application period total $5.54.

[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.

IV. RECORDS SUPPORTING THIS APPLICATION

35. No agreement or understanding, written or oral, express, or implied, exists between Dykema, Ahuja, Stretto, or H&J 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, Ahuja, Stretto, and H&J kept contemporaneous time records on a daily basis and tracked their billings on a tenth-of-an-hour basis (except as noted below for H&J) with time charges allocated accordingly.

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

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

39. In addition, Dykema has categorized their services by task. Attached hereto as **Exhibit D** is the *Summary of Fees by Task for All Matters*, which summarizes the number of hours incurred relative to each task category for each firm during the Application Period. It contains individualized and detailed descriptions of the daily services rendered and the hours expended by the professionals employed on behalf of the Receiver in this Case. During this Application Period,

Dykema incurred $3,492.90 in expenses in connection with the rendition of services on behalf of the Receiver, H&J incurred B$440.00 (and associated B$44.00 for 10% VAT) in expenses in connection with the rendition of services on behalf of the Receiver, and Stretto incurred $5.54 in expenses in connection with the rendition of services on behalf of the Receiver. The Receiver and Ahuja 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 H&J's invoice during its Application Period. Attached hereto as **Exhibit E-3** is the invoice of Ahuja during the Application Period. Attached hereto as **Exhibit E-4** is the invoice of Stretto during the Application Period. The Receiver has reviewed and approved these time records, and based on the complexity and novelty of issues presented in this Case, the Receiver respectfully submits that the requested compensation is reasonable.

41. Dykema, Ahuja, Stretto, and H&J 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, 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 marketing 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, 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, and other various 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, Ahuja's, Stretto's, and H&J'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; and

(e) Working with PwC on insuring and maintaining the Bahamas Properties.

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.

Ahuja

56. During the Application Period, Ahuja prepared and reconciled the accounting records and the Standard Fund Accounting Report for the Receivership Parties.

Stretto

57. During the Application Period, Stretto served as the Receiver's claims and disbursement agent in this Case, including issuance of late investor distribution checks. 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.

Fees and Expenses of Receiver's Retained Personnel

58. Dykema, Ahuja, Stretto, and H&J 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.

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

PROFESSIONAL	TOTAL HOURS	TOTAL FEES	TOTAL EXPENSES
Deborah D. Williamson, Receiver	7.30 hours	$4,927.50	$0.00
Dykema Gossett PLLC	54.90 hours	$25,221.20	$3,492.90
Ahuja & Clark, PLLC n/k/a Ahuja & Consultants, Inc.	6.40 hours	$1,222.00	$0.00
Stretto, Inc.	20.40 hours	$8,785.75	$5.54
Higgs & Johnson[4]	43.75 hours	B$24,743.75	B$440.00

[4] The total compensation requested by H&J during the Application Period is B$27,702.13, consisting of B$24,743.75 for fees, B$440.00 for expenses, and B$2,518.38 for the 10% VAT.

60. 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.

61. 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 **$1,078,315.40**, exclusive of any future recovery.

VII. CONCLUSION

62. 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 $4,927.50, (ii) all fees incurred by Dykema as counsel to the Receiver during the Application Period, totaling $25,221.20, (iii) all fees incurred by H&J as Bahamian counsel to the Receiver during the Application Period, totaling B$24,743.75 and the 10% VAT in the amount of B$2,474.38, (iv) all fees incurred by Ahuja as tax and forensic accountants to the Receiver during the Application Period, totaling $1,222.00, and (vi) all fees incurred by Stretto as claims and disbursement agent to the Receiver during the Application Period, totaling $8,785.75; (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 $3,492.90, (ii) all expenses incurred by H&J as Bahamian counsel

to the during the Application Period, totaling B$440.00 and the 10% VAT in the amount of B$44.00, and (iii) all expenses incurred by Stretto as claims and disbursement agent to the Receiver during the Application Period, totaling $5.54; and (c) authorizing the Receiver to pay (i) all authorized outstanding fee amounts to Dykema, including the Receiver's fees, totaling $30,148.70, (ii) all authorized outstanding fee amounts to H&J, totaling B$24,743.75 and the 10% VAT in the amount of B$2,474.38, (iii) all authorized outstanding fee amounts to Ahuja, totaling $1,222.00, and (iv) all authorized outstanding fee amounts to Stretto, totaling $8,785.75; (d) authorizing the Receiver to pay (i) all authorized outstanding expenses of Dykema, totaling $3,492.90, (ii) all authorized outstanding expenses of Stretto, totaling $5.54, and (iii) all authorized outstanding expenses of H&J, totaling B$440.00 and the 10% VAT in the amount of B$44.00; and (e) awarding such other and further relief that this Court deems just and proper.

Dated: November 13, 2026

Respectfully submitted,

By: *<u>/s/ Deborah D. Williamson</u>*

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

Carolyn Bremer
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 does not oppose the relief requested herein.

/s/ Danielle Rushing Behrends
Danielle Rushing Behrends

CERTIFICATE OF SERVICE

I hereby certify that on November 13, 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/ Carolyn Bremer
Carolyn Bremer
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 B

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

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

Standardized Fund Accounting Report

Reporting Period: 7/01/2026 to 9/30/2026

			Detail	Subtotal	Grand Total
1		Beginning Balance (July 1, 2026):			$ 1,161,289.13
2		Business Income			-
3		Cash and Cash Equivalents	Settlement Payment from Defendant Rustin Brunson	2,000.00	2,000.00
4		Interest/Dividend Income		367.21	367.21
5		Business Asset Liquidation			
6		Personal Asset Liquidation			
7		Third-Party Litigation Income			
8		Miscellaneous - Other	Funds received and IRS refund	55,930.36	55,930.36
		Total Funds Available			**$ 1,219,586.70**
9		Disbursements to Investors			$ 2,538.89
			Class 4, 4a	2,538.89	
			Class 5		
10		Disbursements for Receivership Operations			$ 35,953.68
	10a	Disbursements to Receiver or Other Professionals	Payments to Attorneys, Accountants, Receiver	32,964.54	
	10b	Business Asset and Operating Expenses	Filing fees, Insurance		
	10c	Personal Asset Expenses			
	10d	Investment Expenses			
	10e	Third-Party Litigation Expenses			
	10f	Tax Administrator Fees and Bonds			
	10g	Federal and State Tax Expenses			
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.		2,989.14	
	12b	Federal income taxes			
		Total Funds Disbursed			**$ 38,492.57**
13		**Ending Balance (September 30, 2026)**			**$ 1,181,094.13**
14		Ending Balance of Fund - Net Assets			
	14a	Cash & Cash Equivalents		$ 1,181,094.13	
	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			-

The Heartland Group Ventures, LLC, et al., - Cash Basis
Civil Action No.: 4:21-CV-01310-O
Standardized Fund Accounting Report
Reporting Period: 7/01/2026 to 9/30/2026

			Detail	Subtotal	Grand Total
18		No. of Claims			
	18a	the number of claims received from investors during this reporting period	0 claims		
	18b	the number of claims received from investors as a result of all orders since the inception of the Fund	734 claims		
19		No. of Claimants/Investors			
	19a	the number of claimants/investors receiving distributions during the reporting period	1 claimant		
	19b	the number of claimants/investors receiving distributions pursuant to all orders of distribution since the inception of the	631 claimants		

EXHIBIT B

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

UNITED STATES SECURITIES AND EXCHANGE COMMISSION,	§	
	§	
Plaintiff,	§	
	§	
v.	§	
	§	
THE HEARTLAND GROUP VENTURES, LLC; HEARTLAND PRODUCTION AND RECOVERY LLC; HEARTLAND PRODUCTION AND RECOVERY FUND LLC; HEARTLAND PRODUCTION AND RECOVERY FUND II LLC; THE HEARTLAND GROUP FUND III, LLC; HEARTLAND DRILLING FUND I, LP; CARSON OIL FIELD DEVELOPMENT FUND II, LP; ALTERNATIVE OFFICE SOLUTIONS, LLC; ARCOOIL CORP.; BARRON PETROLEUM LLC; JAMES IKEY; JOHN MURATORE; THOMAS BRAD PEARSEY; MANJIT SINGH (AKA ROGER) SAHOTA; and RUSTIN BRUNSON,	§	**No. 4-21CV-1310-O-BP**
	§	
Defendants,	§	
	§	
and	§	
	§	
DODSON PRAIRIE OIL & GAS LLC; PANTHER CITY ENERGY LLC; MURATORE FINANCIAL SERVICES, INC.; BRIDY IKEY; ENCYPHER BASTION, LLC; IGROUP ENTERPRISES LLC; HARPRIT SAHOTA; MONROSE SAHOTA; SUNNY SAHOTA; BARRON ENERGY CORPORATION; DALLAS RESOURCES INC.; LEADING EDGE ENERGY, LLC; SAHOTA CAPITAL LLC; and 1178137 B.C. LTD.,	§	
	§	
Relief Defendants.	§	
	§	
	§	

ORDER APPROVING RECEIVER'S FEE APPLICATION FOR SERVICES PERFORMED BETWEEN JULY 1, 2026 AND SEPTEMBER 30, 2026, AND BRIEF IN SUPPORT

Before the Court is the *Fee Application for Services Performed Between July 1, 2026 and September 30, 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"); Ahuja & Clark, PLLC n/k/a Ahuja & Consultants, Inc. ("Ahuja"); Stretto, Inc. ("Stretto"); and Higgs & Johnson ("H&J"), 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, Ahuja, Stretto, and H&J 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 **$4,927.50**.

[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 **$25,221.20**.

4. Ahuja's fees incurred during the Application Period are approved on an interim basis and allowed in the amount of **$1,222.00**.

5. Stretto's fees incurred during the Application Period are approved on an interim basis and allowed in the amount of **$8,785.75**.

6. H&J's fees incurred during its Application Period are approved on an interim basis and allowed in the amount of **B$24,743.75**, in addition to the 10% VAT in the amount of **B$2,518.38**.

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 **$3,492.90**.

8. 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 **$5.54**.

9. H&J's expenses incurred during the Application Period are approved on an interim basis and allowed in the amount of **B$440.00**.

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), Ahuja, Stretto, and H&J 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

TIMEKEEPER	HOURS	HOURLY RATE	TOTAL FEES
Deborah D. Williamson	7.30 hours	$675.00	$4,927.50

Dykema Gossett PLLC

TIMEKEEPER	TITLE	HOURS	HOURLY RATE	TOTAL FEES
Behrends, Danielle Rushing	Member	50.30 hours	$475.00	$23,892.50
Douglas, Dominique A.	Associate	3.40 hours	$330.00	$1,122.00
Flores, Victoria E.	Paralegal	0.90 hours	$153.00	$137.70
Lafuente, Adrianna	Paralegal	0.30 hours	$230.00	$69.00

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

TIMEKEEPER	HOURS	HOURLY RATE	TOTAL FEES
Shetty, Divya	1.00 hours	$250.00	$250.00
Wallace, Jennifer	5.40 hours	$180.00	$972.00

Higgs & Johnson

TIMEKEEPER	HOURS	HOURLY RATE	TOTAL FEES
Archer-Glasgow, Tara	9.75 hours	B$800.00	B$7,800.00
Hanna, Audley D.	14.25 hours	B$600.00	B$8,550.00
Pennerman, Nicholas	19.75 hours	B$425.00	B$8,393.75

Stretto, Inc.

TIMEKEEPER	HOURS	HOURLY RATE	TOTAL FEES
Alduenda, Jenice	1.40 hours	$550.00	$770.00
Banking Staff	2.50 hours	$475.00	$1,187.50
Brown, Fred	1.10 hours	$705.00	$775.50
Cady, Stephen	1.70 hours	$625.00	$1,062.50
Danpongchareon, Pete	0.20 hours	$475.00	$95.00
Guevara, Ruben	0.40 hours	$475.00	$190.00
Hale, Micheal	7.70 hours	$475.00	$3,657.50
Marshall, Aimee	0.20 hours	$130.00	$26.00
Quang, Ricky	0.20 hours	$97.50	$19.50
Ramirez, Daniel	0.10 hours	$135.00	$13.50
Randa, Lisa	0.10 hours	$550.00	$55.00
Rodriguez, Naomi	0.10 hours	$97.50	$9.75
Saraceni, Robert	4.20 hours	$195.00	$819.00
Soper, Brian	0.50 hours	$210.00	$105.00

EXHIBIT D

Summary of Fees by Task for All Matters

Receiver

Category Description	Total Billable Amount	Total Billable Time
Case Administration	$2,295.00	3.40 hours
Asset Disposition	$270.00	0.40 hours
Business Operations	$1,687.50	2.50 hours
Status Reports	$270.00	0.40 hours
Litigation Consulting	$405.00	0.60 hours
TOTAL	**$4,927.50**	**7.30 hours**

Dykema Gossett PLLC

Category Description	Total Billable Amount	Total Billable Time
Case Administration[5]	$10,738.00	23.10 hours
Asset Disposition	$2,042.50	4.30 hours
Business Operations	$5,856.20	12.60 hours
Tax Issues	$1,710.00	3.60 hours
Claims Administration and Objection	$604.50	1.70 hours
Status Reports	$1,752.50	4.30 hours
Litigation Consulting	$2,517.50	5.30 hours
TOTAL	**$25,221.20**	**54.90 hours**

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

Category Description	Total Billable Amount	Total Billable Time
Accounting/Auditing	$1,222.00	6.40 hours
TOTAL	**$1,222.00**	**6.40 hours**

Stretto, Inc.

Category Description	Total Billable Amount	Total Billable Time
Case Administration	$8,785.75	20.40 hours
TOTAL	**$8,785.75**	**20.40 hours**

[5] 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."

Higgs & Johnson

Category Description	Total Billable Amount	Total Billable Time
Litigation Consulting	B$24,743.75	43.75 hours
TOTAL	**B$24,743.75**[6]	**43.75 hours**

[6] The 10% VAT associated with this total billable amount is B$2,474.38.

EXHIBIT C

Summary of Fees by Timekeeper

Receiver

TIMEKEEPER	HOURS	HOURLY RATE	TOTAL FEES
Deborah D. Williamson	7.30 hours	$675.00	$4,927.50

Dykema Gossett PLLC

TIMEKEEPER	TITLE	HOURS	HOURLY RATE	TOTAL FEES
Behrends, Danielle Rushing	Member	50.30 hours	$475.00	$23,892.50
Douglas, Dominique A.	Associate	3.40 hours	$330.00	$1,122.00
Flores, Victoria E.	Paralegal	0.90 hours	$153.00	$137.70
Lafuente, Adrianna	Paralegal	0.30 hours	$230.00	$69.00

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

TIMEKEEPER	HOURS	HOURLY RATE	TOTAL FEES
Shetty, Divya	1.00 hours	$250.00	$250.00
Wallace, Jennifer	5.40 hours	$180.00	$972.00

Higgs & Johnson

TIMEKEEPER	HOURS	HOURLY RATE	TOTAL FEE
Archer-Glasgow, Tara	9.75 hours	B$800.00	B$7,800.00
Hanna, Audley D.	14.25 hours	B$600.00	B$8,550.00
Hickman, Peter	19.75 hours	B$425.00	$8,393.75

Stretto, Inc.

TIMEKEEPER	HOURS	HOURLY RATE	TOTAL FEE
Alduenda, Jenice	1.40 hours	$550.00	$770.00
Banking Staff	2.50 hours	$475.00	$1,187.50
Brown, Fred	1.10 hours	$705.00	$775.50
Cady, Stephen	1.70 hours	$625.00	$1,062.50
Danpongchareon, Pete	0.20 hours	$475.00	$95.00
Guevara, Ruben	0.40 hours	$475.00	$190.00
Hale, Micheal	7.70 hours	$475.00	$3,657.50
Marshall, Aimee	0.20 hours	$130.00	$26.00
Quang, Ricky	0.20 hours	$97.50	$19.50
Ramirez, Daniel	0.10 hours	$135.00	$13.50
Randa, Lisa	0.10 hours	$550.00	$55.00
Rodriguez, Naomi	0.10 hours	$97.50	$9.75
Saraceni, Robert	4.20 hours	$195.00	$819.00
Soper, Brian	0.50 hours	$210.00	$105.00

EXHIBIT D

Summary of Fees by Task for All Matters

Receiver

Category Description	Total Billable Amount	Total Billable Time
Case Administration	$2,295.00	3.40 hours
Asset Disposition	$270.00	0.40 hours
Business Operations	$1,687.50	2.50 hours
Status Reports	$270.00	0.40 hours
Litigation Consulting	$405.00	0.60 hours
TOTAL	**$4,927.50**	**7.30 hours**

Dykema Gossett PLLC

Category Description	Total Billable Amount	Total Billable Time
Case Administration[7]	$10,738.00	23.1 hours
Asset Disposition	$2,042.50	4.30 hours
Business Operations	$5,856.20	12.60 hours
Tax Issues	$1,710.00	3.60 hours
Claims Administration and Objection	$604.50	1.70 hours
Status Reports	$1,752.50	4.30 hours
Litigation Consulting	$2,517.50	5.30 hours
TOTAL	**$25,221.20**	**54.90 hours**

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

Category Description	Total Billable Amount	Total Billable Time
Accounting/Auditing	$1,222.00	6.40 hours
TOTAL	**$1,222.00**	**6.40 hours**

Stretto, Inc.

Category Description	Total Billable Amount	Total Billable Time
Case Administration	$8,785.75	20.40 hours
TOTAL	**$8,785.75**	**20.40 hours**

[7] 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."

Higgs & Johnson

Category Description	Total Billable Amount	Total Billable Time
Litigation Consulting	B$24,743.75	43.75 hours
TOTAL	**B$24,743.75**	**43.75 hours**

EXHIBIT E-1

Dykema 100 YEARS EST. 1926
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

AUGUST 30, 2026
MATTER #: 122686.000001
INVOICE #: 3758691

FOR PROFESSIONAL SERVICES RENDERED

RE: RECEIVER'S TIME

FEES	$	1,012.50
INVOICE TOTAL	**$**	**1,012.50**

Dykema 100 YEARS EST. 1926

DEBORAH D WILLIAMSON
DEBORAH WILLIAMSON

MATTER #: 122686.000001
INVOICE #: 3758691
PAGE 2

AUGUST 30, 2026

RE: RECEIVER'S TIME

DATE	ID	DESCRIPTION	HOURS
07/02/26	DDW	REVIEW OF UPDATE FROM MR. UNDERWOOD.	0.30
07/06/26	DDW	CONFERENCE REGARDING PAYMENT OF BAHAMAS EXPENSES, INCLUDING INSURANCE AND TAXES INCLUDING REVIEW OF REQUEST.	0.40
07/22/26	DDW	COMMUNICATIONS WITH WESTERN BANK REGARDING PAYMENT.	0.40
07/29/26	DDW	REVIEW OF STATUS REPORT.	0.40
		TOTAL HOURS	**1.50**
		TOTAL	**$1,012.50**

Dykema 100 YEARS EST. 1926

DEBORAH D WILLIAMSON
DEBORAH WILLIAMSON

MATTER #: 122686.000001
INVOICE #: 3758691
PAGE 3

AUGUST 30, 2026

BILLING SUMMARY

ID	TIMEKEEPER	HOURS	RATES	AMOUNT
DDW	DEBORAH WILLIAMSON	1.50	675.00	1,012.50
	TOTAL	**1.50**		**$1,012.50**

Dykema 100 YEARS EST. 1926

DEBORAH D WILLIAMSON
DEBORAH WILLIAMSON

MATTER #: 122686.000001
INVOICE #: 3758691
PAGE 4

AUGUST 30, 2026

TASK SUMMARY

TASK	TASK DESCRIPTION	HOURS	AMOUNT
B210	BUSINESS OPERATIONS	1.10	742.50
BT155	STATUS REPORTS	0.40	270.00
	TOTAL	**1.50**	**1,012.50**

Dykema 100 YEARS EST. 1926
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

SEPTEMBER 30, 2026
MATTER #: 122686.000001
INVOICE #: 3765441

FOR PROFESSIONAL SERVICES RENDERED

RE: RECEIVER'S TIME

FEES	$	1,215.00
INVOICE TOTAL	**$**	**1,215.00**

Dykema 100 YEARS EST. 1926

DEBORAH D WILLIAMSON
DEBORAH WILLIAMSON

MATTER #: 122686.000001
INVOICE #: 3765441
PAGE 2

SEPTEMBER 30, 2026

RE: RECEIVER'S TIME

DATE	ID	DESCRIPTION	HOURS
08/04/26	DDW	MULTIPLE COMMUNICATIONS REGARDING ADDITIONAL WIRE TO BAHAMAS FOR EXPENSES; REVIEW OF LISTING INFORMATION FOR BAHAMAS PROPERTIES.	0.30
08/05/26	DDW	CONFERENCE REGARDING APPROVAL OF WIRE TRANSFERS RELATED TO EXPENSES FOR BAHAMAS PROPERTIES.	0.40
08/05/26	DDW	REVIEW OF UPDATE REGARDING VAL VERDE/CROCKETT WELLS.	0.30
08/20/26	DDW	(NO CHARGE) PREPARE FOR AND ATTEND CONFERENCE WITH JUDGE RAY REGARDING PWC FEES.	0.00
08/31/26	DDW	PREPARE FOR AND ATTEND CONFERENCE WITH PWC REGARDING FEE APPLICATION.	0.80
		TOTAL HOURS	**1.80**
		TOTAL	**$1,215.00**

Dykema 100 YEARS EST. 1926

DEBORAH D WILLIAMSON
DEBORAH WILLIAMSON

MATTER #: 122686.000001
INVOICE #: 3765441
PAGE 3

SEPTEMBER 30, 2026

BILLING SUMMARY

ID	TIMEKEEPER	HOURS	RATES	AMOUNT
DDW	DEBORAH WILLIAMSON	1.80	675.00	1,215.00
	TOTAL	**1.80**		**$1,215.00**

Dykema 100 YEARS EST. 1926

DEBORAH D WILLIAMSON
DEBORAH WILLIAMSON

MATTER #: 122686.000001
INVOICE #: 3765441
PAGE 4

SEPTEMBER 30, 2026

TASK SUMMARY

TASK	TASK DESCRIPTION	HOURS	AMOUNT
B110	CASE ADMINISTRATION	0.00	0.00
B130	ASSET DISPOSITION	0.40	270.00
B210	BUSINESS OPERATIONS	1.40	945.00
	TOTAL	**1.80**	**1,215.00**

Dykema 100 YEARS EST. 1926

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

STATEMENT OF ACCOUNT
DEBORAH D WILLIAMSON

Account Balance As Of: September 30, 2026
Billing Attorney: DEBORAH WILLIAMSON
Last Payment: September 15, 2026

Bill and Payment History

MATTER ID: 122686.000001 RECEIVER'S TIME

Invoice	Date	Original Balance	Payments	Current Balance
3765441	09/30/2026	1,215.00	0.00	1,215.00
	Total	**1,215.00**	**0.00**	**1,215.00**

Current	31-60	61-90	91-120	OVER 120
0.00	0.00	0.00	0.00	0.00

Dykema 100 YEARS EST. 1926
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

OCTOBER 30, 2026
MATTER #: 122686.000001
INVOICE #: 3772195

FOR PROFESSIONAL SERVICES RENDERED

RE: RECEIVER'S TIME

FEES	$	2,700.00
INVOICE TOTAL	**$**	**2,700.00**

Dykema 100 YEARS EST. 1926

DEBORAH D WILLIAMSON
DEBORAH WILLIAMSON

MATTER #: 122686.000001
INVOICE #: 3772195
PAGE 2

OCTOBER 30, 2026

RE: RECEIVER'S TIME

DATE	ID	DESCRIPTION	HOURS
09/14/26	DDW	PREPARE FOR AND ATTEND HEARING.	0.80
09/14/26	DDW	MULTIPLE COMMUNICATIONS REGARDING PWC.	0.40
09/15/26	DDW	COMMUNICATIONS WITH HIGGS & JOHNSON REGARDING PROCESS IN BAHAMAS AND RECENT PLEADINGS.	0.60
09/17/26	DDW	CONFERENCE WITH PWC (1.5); CONFERENCE WITH HIGGS & JOHNSON ALL REGARDING PWC FEES, STATUS OF RECEIVERSHIP IN BAHAMAS AND OTHER ISSUES; REVIEW OF UPDATE FROM BROKER REGARDING BAHAMAS AND POTENTIAL INTEREST.	2.20
		TOTAL HOURS	**4.00**
		TOTAL	**$2,700.00**

Dykema 100 YEARS EST. 1926

DEBORAH D WILLIAMSON
DEBORAH WILLIAMSON

MATTER #: 122686.000001
INVOICE #: 3772195
PAGE 3

OCTOBER 30, 2026

BILLING SUMMARY

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

Dykema 100 YEARS EST. 1926

DEBORAH D WILLIAMSON
DEBORAH WILLIAMSON

MATTER #: 122686.000001
INVOICE #: 3772195
PAGE 4

OCTOBER 30, 2026

TASK SUMMARY

TASK	TASK DESCRIPTION	HOURS	AMOUNT
B110	CASE ADMINISTRATION	3.40	2,295.00
BT160	LITIGATION CONSULTING	0.60	405.00
	TOTAL	**4.00**	**2,700.00**

Dykema 100 YEARS EST. 1926
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

AUGUST 30, 2026
MATTER #: 122686.000002
INVOICE #: 3758692

FOR PROFESSIONAL SERVICES RENDERED

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

FEES	$	5,093.70
DISBURSEMENTS		1,671.00
INVOICE TOTAL	**$**	**6,764.70**

Dykema 100 YEARS EST. 1926

DEBORAH D WILLIAMSON
DEBORAH WILLIAMSON

MATTER #: 122686.000002
INVOICE #: 3758692
PAGE 2

AUGUST 30, 2026

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

DATE	ID	DESCRIPTION	HOURS
07/06/26	DNR	CORRESPONDENCE WITH WAB REGARDING BANK ACCOUNTS AND ISSUES ON SAME; RECEIVE AND REVIEW IBC BANK JUNE 2026 STATEMENT; RECEIVE AND REVIEW MONTHLY UPDATE FROM SDMB.	1.00
07/06/26	DNR	CORRESPONDENCE WITH PWC REGARDING PROPERTY TAXES AND VAT STATUS FOR EACH PROPERTY.	0.20
07/07/26	DNR	CORRESPONDENCE WITH SEC COUNSEL REGARDING SETTLEMENT PAYMENTS.	0.30
07/07/26	DNR	RECEIVE WAB BANK ACCOUNT STATEMENTS FOR JUNE 2026 AND SEND TO AHUJA & CONSULTANTS; DISCUSS BAHAMAS PROPERTY INSURANCE AND PROPERTY TAXES OUTSTANDING WITH RECEIVER AND PULL DOCUMENTATION RELATING TO SAME; CORRESPONDENCE WITH PWC REGARDING PROPERTY TAX PAYMENT, INSURANCE RENEWAL, AND RECORDING AND STAMPING OF CONVEYANCES PRIOR TO COMMENCING ANY SALE TRANSACTION.	1.00
07/08/26	DNR	RECEIVE AND PROCESS RECEIVER'S MAIL.	0.20
07/13/26	DNR	RECEIVE AND REVIEW IBC ACCOUNT ANALYSIS; SEND TO AHUJA & CONSULTANTS.	0.20
07/14/26	DNR	CORRESPONDENCE WITH AHUJA & CONSULTANTS REGARDING BANK DEPOSIT AND DETAILS ON SAME.	0.20
07/17/26	DNR	CORRESPONDENCE WITH AHUJA & CONSULTANTS REGARDING QUESTIONS ON EXHIBIT TO QUARTERLY REPORT REGARDING DISBURSEMENT; CORRESPONDENCE TO PWC REGARDING STATUS OF RESPONSES TO RECEIVER AND INFORMATION FOR QUARTERLY REPORT.	0.40
07/17/26	DNR	RECEIVE AND REVIEW LETTERS FROM TEXAS RAILROAD COMMISSION.	0.40
07/17/26	DADO	BEGIN DRAFTING 2Q2026 QUARTERLY REPORT.	0.70
07/17/26	DADO	REVIEW RECEIPTS AND DISBURSEMENT AND SFAR PROVIDED BY AHUJA & CONSULTANTS; EMAIL CORRESPONDENCE TO MS. BEHRENDS AND AHUJA & CONSULTANTS REGARDING REVIEW OF SFAR AND REQUESTED CHANGE ON THE SAME.	0.30
07/20/26	DNR	CORRESPONDENCE WITH PWC REGARDING STATUS OF DEPT. OF INLAND REVENUE NEGOTIATIONS AND PROPERTY TAX PAYMENT ITEMS.	0.30
07/20/26	DNR	REVIEW LETTER FROM ALLOWED CLAIMANT TO COURT FILED ON DOCKET BY CLERK'S OFFICE; REQUEST CHECK ISSUED TO ALLOWED CLAIMANT FROM STRETTO; CALL WITH RECEIVER REGARDING RESPONSE AND PAYMENT DETAILS ON SAME.	0.60
07/22/26	DNR	REVISE NOTICE OF RETENTION OF BROKER AND DECLARATION THERETO; SEND	0.60

Dykema 100 YEARS EST. 1926

DEBORAH D WILLIAMSON
DEBORAH WILLIAMSON

MATTER #: 122686.000002
INVOICE #: 3758692

AUGUST 30, 2026

DATE	ID	DESCRIPTION	HOURS
		TO RECEIVER FOR REVIEW.	
07/23/26	VEF1	REVIEW CHECK RECEIVED AND DELIVER DEPOSIT TO IBC BANK.	0.40
07/24/26	DNR	CORRESPONDENCE WITH BAHAMAS BROKER REGARDING DECLARATION FOR REVIEW AND COMMENT OR SIGNATURE; REVISE DECLARATION BASED ON BROKER'S COMMENTS; FINALIZE AND SEND FOR SIGNATURE AND FILING ON DOCKET.	0.60
07/29/26	DNR	REVISE AND FINALIZE QUARTERLY REPORT FOR 2Q26.	1.50
07/29/26	DNR	DISCUSS PROPERTY TAXES ON BAHAMAS PROPERTIES WITH DEBORAH WILLIAMSON AND NEXT STEPS ON 2026 BALANCES.	0.30
07/30/26	DNR	CALL WITH PERDUE BRANDON LAW FIRM REGARDING NOTICES OF TAX LIENS RECEIVED FOR DODSON PRAIRIE AND PANTHER CITY ENERGY; LENGTHY CORRESPONDENCE TO PALO PINTO CAD COUNSEL REGARDING RECEIVERSHIP ORDER, ABANDONMENT OF OIL AND GAS PROPERTIES, NOTICES OF ABANDONMENT, AND RELATED PROCEDURAL HISTORY FOR SYSTEM AND HALTING OF LIENS.	1.00
07/30/26	DNR	PREPARE INTERNATIONAL WIRE FORM FOR WAB TO NEW CIBC CARIBBEAN BANK ACCOUNT FOR PAYMENT OF PROPERTY TAXES ON BAHAMAS PROPERTIES; CORRESPONDENCE WITH WAB REGARDING SAME AND PROVISION OF TAX CERTIFICATES FOR BOTH PROPERTIES; CORRESPONDENCE WITH PWC TEAM REGARDING INFORMATION NEEDED FOR WAB FROM CIBC CARIBBEAN BANK TO COMPLETE WIRE FORM; RECEIVE AND PROCESS RECEIVER'S MAIL.	1.10
		TOTAL HOURS	**11.30**
		TOTAL	**$5,093.70**

Dykema 100 YEARS EST. 1926

DEBORAH D WILLIAMSON
DEBORAH WILLIAMSON

MATTER #: 122686.000002
INVOICE #: 3758692
PAGE 4

AUGUST 30, 2026

BILLING SUMMARY

ID	TIMEKEEPER	HOURS	RATES	AMOUNT
DNR	DANIELLE R. BEHRENDS	9.90	475.00	4,702.50
DADO	DOMINIQUE A. DOUGLAS	1.00	330.00	330.00
VEF1	VICKI FLORES	0.40	153.00	61.20
	TOTAL	**11.30**		**$5,093.70**

Dykema 100 YEARS EST. 1926

DEBORAH D WILLIAMSON
DEBORAH WILLIAMSON

MATTER #: 122686.000002
INVOICE #: 3758692
PAGE 5

AUGUST 30, 2026

DISBURSEMENTS

DATE	DESCRIPTION	AMOUNT
	PRINTING EXPENSES	11.00
	RELATIVITY DATA HOSTING	1,660.00
	TOTAL DISBURSEMENTS	**1,671.00**

Dykema 100 YEARS EST. 1926

DEBORAH D WILLIAMSON
DEBORAH WILLIAMSON

MATTER #: 122686.000002
INVOICE #: 3758692
PAGE 6

AUGUST 30, 2026

TASK SUMMARY

TASK	TASK DESCRIPTION	HOURS	AMOUNT
B110	CASE ADMINISTRATION	0.90	427.50
B130	ASSET DISPOSITION	1.70	807.50
B210	BUSINESS OPERATIONS	4.80	2,151.20
B240	TAX ISSUES	1.00	475.00
BT155	STATUS REPORTS	2.90	1,232.50
	TOTAL	**11.30**	**5,093.70**

Dykema 100 YEARS EST. 1926
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

SEPTEMBER 30, 2026
MATTER #: 122686.000002
INVOICE #: 3765440

FOR PROFESSIONAL SERVICES RENDERED

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

FEES	$	5,986.50
DISBURSEMENTS		1,744.90
INVOICE TOTAL	**$**	**7,731.40**

Dykema 100 YEARS EST. 1926

DEBORAH D WILLIAMSON
DEBORAH WILLIAMSON

MATTER #: 122686.000002
INVOICE #: 3765440
PAGE 2

SEPTEMBER 30, 2026

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

DATE	ID	DESCRIPTION	HOURS
08/03/26	DNR	CORRESPONDENCE TO PWC REGARDING CIBC BANK CARIBBEAN ACCOUNT INFORMATION NEEDED FOR PROPERTY TAX WIRE; CORRESPONDENCE WITH WAB REGARDING ACCOUNT MONTHLY FEE CHARGES AND REVERSAL REQUEST FOR NEW ACCOUNT; CORRESPONDENCE WITH WAB REGARDING ACCOUNT STATEMENT FOR JUDGMENT AND SETTLEMENT ACCOUNT; RECEIVE AND REVIEW ACCOUNT STATEMENTS FOR 3 WAB ACCOUNTS AND IBC BANK ACCOUNT FOR JULY 2026; SEND SAME TO A&C.	1.00
08/03/26	DNR	REVIEW INQUIRY FROM ALLEGED INVESTOR REGARDING PAYMENT STATUS; ANALYZE CLAIM AND DISTRIBUTION SPREADSHEETS FOR ALLEGED INVESTOR.	0.40
08/04/26	DNR	RECEIVE AND REVIEW DELINQUENT NOTICES FROM TEXAS RAILROAD COMMISSION FOR DODSON PRAIRIE AND ARCOOIL; DISCUSS BANK ACCOUNT ITEMS WITH RECEIVER; CORRESPONDENCE WITH PWC REGARDING INTERNATIONAL BANK ACCOUNT ITEMS AND INFORMATION NEEDED TO WIRE FUNDS TO PAY PROPERTY TAXES; RECEIVE AND PROCESS RECEIVER'S MAIL; REVISE INTERNATIONAL WIRE FORM WITH CIBC CARIBBEAN BANK INFORMATION; DISCUSS FORM AND REMIT TO WAB FOR PAYMENT OF PROPERTY TAXES; DISCUSS MAINTENANCE AND UTILITIES COSTS WITH RECEIVER; PREPARE AND SUBMIT TO WAB INTERNATIONAL WIRE FORM FOR PAYMENT OF SAME FOR BAHAMAS PROPERTIES; CORRESPONDENCE TO BROKER REGARDING REQUEST FOR PROPERTY LISTINGS AND UPDATE ON INQUIRIES AND INTEREST IN PROPERTIES.	1.30
08/04/26	DNR	CALL WITH ALLEGED INVESTOR REGARDING INVESTMENT DETAILS AND HEARTLAND LIFE SETTLEMENTS NOT INCLUDED IN RECEIVERSHIP.	0.20
08/05/26	DNR	RECEIVE AND REVIEW UPDATE FROM FARMEE; CORRESPONDENCE WITH WAB REGARDING INTERNATIONAL WIRE REQUESTS.	0.50
08/12/26	DNR	RECEIVE AND REVIEW IRS MAIL; DISCUSS SAME WITH RECEIVER.	0.30
08/13/26	DNR	RECEIVE AND REVIEW IBC ACCOUNT ANALYSIS; SEND TO A&C.	0.20
08/13/26	DNR	CORRESPONDENCE WITH SEC COUNSEL REGARDING SETTLEMENT PAYMENT NOT RECEIVED FOR AUGUST 2026 FROM RUSTIN BRUNSON.	0.20
08/14/26	DADO	HEARTLAND - RECEIVERS FEE APPLICATION FOR SERVICES PERFORMED BETWEEN APRIL 1 TO JUNE 30 2026 4905-0669-7925 V.3.PDF - TUNGSTEN (FORMERLY KOFAX) POWER PDF ADVANCED HEARTLAND - RECEIVERS FEE APPLICATION FOR SERVICES PERFORMED BETWEEN APRIL 1 TO JUNE 30 2026 4905-0669-7925 V.3.PDF - TUNGSTEN (FORMERLY KOFAX) POWER PDF ADVANCED EDITED DOC HEARTLAND - PWC BIOS.DOCX 4908-0833-3511 V.1.DOCX EDITED DOC HEARTLAND - PROPOSED ORDER FOR RECEIVERS FEE APPLICATION FOR SERVICES PERFORMED BETWEEN APRIL 1 TO JUNE 30	0.50

Dykema 100 YEARS EST. 1926

DEBORAH D WILLIAMSON
DEBORAH WILLIAMSON

MATTER #: 122686.000002
INVOICE #: 3765440

SEPTEMBER 30, 2026

DATE	ID	DESCRIPTION	HOURS
		2026.DOCX 4926-8915-1175 V.1.DOCX	
08/17/26	DNR	REVIEW AND RESPOND TO INVESTOR INQUIRIES; CORRESPONDENCE FROM SEC COUNSEL REGARDING DISCOVERY TO RUSTIN BRUNSON AND REVIEW SAME.	0.70
08/18/26	DNR	CALLS WITH INVESTOR'S SON REGARDING DAD'S PASSING, PAPERWORK REGARDING DISTRIBUTION, AND CASE BACKGROUND; RECEIVE AND REVIEW INFORMATION FROM INVESTOR'S SON REGARDING WILL AND FIDUCIARY STATUS TO INVESTOR'S ESTATE.	0.60
08/18/26	DNR	DISCUSS WITH RECEIVER INVESTMENT HISTORY OF INVESTOR AND ALLEGED BENEFICIARY'S TELEPHONE CALL, AND PROPOSE NEXT STEPS FOR EXTENSION OF DISTRIBUTION DOCUMENTATION.	0.30
08/20/26	DNR	CALL WITH COURTROOM DEPUTY REGARDING TELEPHONE CONFERENCE REQUEST WITH CHAMBERS; CALL WITH CHAMBERS AND RECEIVER TO DISCUSS FEE APPLICATION FOR 2Q26.	0.50
08/20/26	DNR	CORRESPONDENCE WITH PWC REGARDING STATUS UPDATE REQUESTS ON PROPERTY TAX PAYMENT, HOUSE SHOWINGS AND BROKER COMMUNICATIONS, RECORDING/STAMPING, AND VAT NEGOTIATIONS WITH DEPARTMENT OF INLAND REVENUE.	0.40
08/20/26	DNR	REVIEW ORDER SETTING HEARING ON SEPTEMBER 10, 2026.	0.10
08/20/26	DADO	DRAFT AND FINALIZE CERTIFICATE OF SERVICE AND NOTICE OF HEARING FOR HEARING ON FEE APPLICATION.	0.50
08/24/26	DNR	CALL WITH INVESTOR'S BENEFICIARY REGARDING LETTER OF FIDUCIARY AND DISTRIBUTION REQUEST; RECEIVE AND REVIEW LETTER OF FIDUCIARY STATUS FROM SAME; PROVIDE IRS FORM W-9 AND REQUEST COMPLETION FOR DISTRIBUTION PROCESS TO BEGIN; CALL AND CORRESPONDENCE WITH SECURITIES SPECIAL AGENT FROM ILLINOIS SECRETARY OF STATE REGARDING INVESTOR AND INFORMATION REQUESTED FOR PRODUCTION BY RECEIVER; DISCUSS SAME WITH RECEIVER.	1.00
08/24/26	DNR	RECEIVE AND PROCESS RECEIVER'S MAIL.	0.40
08/24/26	DNR	CORRESPONDENCE TO VARIOUS CAD COUNSEL REGARDING NOTICE OF INTENT TO FORECLOSE ON LIENS POST-ABANDONMENT AND PROHIBITION UNDER RECEIVERSHIP ORDER; PREPARE AND SEND TWO PACKAGES TO IRS REGARDING DECLARATIONS FOR 2025 TAX RETURN OF RECEIVER FOR CARSON AND VENTURES.	0.60
08/24/26	DADO	REVIEW AND RESPOND TO INVESTOR INQUIRY.	0.30
08/25/26	DNR	CALL WITH INVESTOR'S BENEFICIARY REGARDING W-9 SUBMISSION AND DISTRIBUTION QUESTIONS FOR DECEASED INVESTOR; CORRESPONDENCE WITH SEC COUNSEL REGARDING CALL REQUEST REGARDING INFORMATION FROM RECEIVER ON ILLINOIS INVESTORS; CORRESPONDENCE TO ILLINOIS REGULATOR CONTACT REGARDING SAME; RECEIVE AND REVIEW W-9	0.70

Dykema 100 YEARS EST. 1926

DEBORAH D WILLIAMSON
DEBORAH WILLIAMSON

MATTER #: 122686.000002
INVOICE #: 3765440

SEPTEMBER 30, 2026

DATE	ID	DESCRIPTION	HOURS
		SUBMISSION AND CORRESPONDENCE WITH INVESTOR'S BENEFICIARY REGARDING DISTRIBUTION TIMELINE AND NEXT STEPS; PROVIDE DOCUMENTATION TO STRETTO FOR PROCESSING AND ISSUANCE OF SAME.	
08/27/26	DNR	(NO CHARGE) CORRESPONDENCE WITH PWC REGARDING SUPPORTING DOCUMENTATION REQUESTED BY COURT FOR FEE APPLICATION AND EXPENSES INCLUDED THEREIN.	0.00
08/27/26	DNR	CORRESPONDENCE WITH STRETTO REGARDING INVESTOR'S BENEFICIARY PAPERWORK AND DISTRIBUTION REQUEST.	0.40
08/28/26	DNR	RECEIVE AND REVIEW COURT'S AMENDED ORDER REGARDING NEW SETTING ON SEPTEMBER 14, 2026; PREPARE NOTICE OF HEARING AND SERVICE OF COURT'S AMENDED ORDER REGARDING SAME.	0.30
08/28/26	DNR	CORRESPONDENCE WITH STRETTO REGARDING DISTRIBUTION REQUEST AND DOCUMENTATION NEEDED FROM RECEIVER; PROCESS SAME AND SEND TO DISTRIBUTION TEAM.	0.40
08/31/26	DNR	RECEIVE AND PROCESS RECEIVER'S MAIL.	0.40
08/31/26	DNR	CORRESPONDENCE TO AHUJA & CONSULTANTS AND TAX COUNSEL REGARDING DENIAL OF RECEIVER'S FORM 5495 FOR FUND III AND HEARTLAND DRILLING FUND I LP BY IRS.	0.30
08/31/26	DNR	(NO CHARGE) CALL WITH PWC AND RECEIVER REGARDING INSTRUCTIONS FROM COURT AND ISSUES WITH FEE APPLICATION AS FILED.	0.00
08/31/26	DNR	CALL WITH COURTROOM DEPUTY REGARDING SEPTEMBER 14, 2026 HEARING AND REPRESENTATIVES FOR PWC AND AHUJA AND CONSULTANTS.	0.10
08/31/26	DNR	CORRESPONDENCE WITH STRETTO REGARDING INVESTOR INQUIRY ON DISTRIBUTION AND CLAIM STATUS, AND REQUEST DOCUMENTATION SUPPORT TO PROVIDE TO SAME; RECEIVE AND REVIEW DOCUMENTATION REGARDING SAME.	0.40
		TOTAL HOURS	**13.00**

TOTAL **$5,986.50**

Dykema 100 YEARS EST. 1926

DEBORAH D WILLIAMSON
DEBORAH WILLIAMSON

MATTER #: 122686.000002
INVOICE #: 3765440
PAGE 5

SEPTEMBER 30, 2026

BILLING SUMMARY

ID	TIMEKEEPER	HOURS	RATES	AMOUNT
DNR	DANIELLE R. BEHRENDS	11.70	475.00	5,557.50
DADO	DOMINIQUE A. DOUGLAS	1.30	330.00	429.00
	TOTAL	**13.00**		**$5,986.50**

Dykema 100 YEARS EST. 1926

DEBORAH D WILLIAMSON
DEBORAH WILLIAMSON

MATTER #: 122686.000002
INVOICE #: 3765440
PAGE 6

SEPTEMBER 30, 2026

DISBURSEMENTS

DATE	DESCRIPTION	AMOUNT
	PRINTING EXPENSES	84.90
	RELATIVITY DATA HOSTING	1,660.00
	TOTAL DISBURSEMENTS	**1,744.90**

Dykema 100 YEARS EST. 1926

DEBORAH D WILLIAMSON
DEBORAH WILLIAMSON

MATTER #: 122686.000002
INVOICE #: 3765440
PAGE 7

SEPTEMBER 30, 2026

TASK SUMMARY

TASK	TASK DESCRIPTION	HOURS	AMOUNT
B110	CASE ADMINISTRATION	4.80	2,280.00
B130	ASSET DISPOSITION	1.20	570.00
B210	BUSINESS OPERATIONS	3.80	1,805.00
B240	TAX ISSUES	1.20	570.00
B310	CLAIMS ADMINISTRATION & OBJECT	0.60	241.50
BT155	STATUS REPORTS	1.40	520.00
	TOTAL	**13.00**	**5,986.50**

Dykema 100 YEARS EST. 1926
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

OCTOBER 30, 2026
MATTER #: 122686.000002
INVOICE #: 3772194

FOR PROFESSIONAL SERVICES RENDERED

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

FEES	$	14,141.00
DISBURSEMENTS		77.00
INVOICE TOTAL	**$**	**14,218.00**

Dykema 100 YEARS EST. 1926

DEBORAH D WILLIAMSON
DEBORAH WILLIAMSON

MATTER #: 122686.000002
INVOICE #: 3772194

OCTOBER 30, 2026

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

DATE	ID	DESCRIPTION	HOURS
09/01/26	DNR	CORRESPONDENCE TO INVESTOR'S BENEFICIARY REGARDING DISTRIBUTION CHECKS.	0.10
09/01/26	DNR	CORRESPONDENCE TO PWC REGARDING ADDITIONAL DOCUMENTATION AND FILING TIMELINE FOR THEIR FEE APPLICATION.	0.10
09/01/26	DNR	RECEIVE AND REVIEW IBC BANK AND WAB STATEMENTS FOR AUGUST 2026; SEND TO AHUJA & CONSULTANTS; RECEIVE AND REVIEW UPDATE FROM FARMEE.	0.50
09/02/26	DNR	RECEIVE AND REVIEW NOTICES FROM RAILROAD COMMISSION OF TEXAS ISSUED TO ARCOOIL CORP. AND DODSON PRAIRIE.	0.20
09/02/26	DNR	CORRESPONDENCE WITH CAD COUNSEL REGARDING NEW NOTICE OF INTENT TO FORECLOSE LIEN REGARDING PANTHER CITY ENERGY; RECEIVE AND REVIEW SAME, INCLUDING NOTICE ISSUED TO BARRON PETROLEUM FROM IRS REGARDING 941 TAXES.	0.40
09/02/26	DNR	CALL WITH SEC COUNSEL REGARDING INQUIRY FOR INFORMATION FROM ILLINOIS SECRETARY OF STATE'S OFFICE; CALL WITH INVESTORS REGARDING DISTRIBUTION AND CLAIM AMOUNT QUESTIONS; CORRESPONDENCE WITH INVESTOR REGARDING TRANSACTION SCHEDULE, ALLOWED CLAIM AMOUNT, AND DISTRIBUTION CHECK INFORMATION.	1.00
09/02/26	DNR	CORRESPONDENCE WITH STRETTO REGARDING DISTRIBUTION DOCUMENTATION FOR INVESTOR; RECEIVE AND REVIEW SAME.	0.30
09/02/26	DADO	REVIEW AND RESPOND TO EMAIL CORRESPONDENCE RECEIVED FROM INVESTORS BENEFICIARY PROVIDING DEATH CERTIFICATE AND OTHER RELEVANT DOCUMENTS; DRAFT EMAIL CORRESPONDENCE TO STRETTO REGARDING ADDRESS CHANGE FOR INVESTORS.	0.40
09/03/26	DNR	RECEIVE AND PROCESS RECEIVER'S MAIL.	0.40
09/04/26	DNR	REVIEW AND RESPOND TO INVESTOR INQUIRIES.	0.40
09/08/26	DNR	RECEIVE AND REVIEW SUPPLEMENT FROM PWC AND REDACT FOR PII; CONSULT WITH SEC COUNSEL ON PWC FEE SUPPLEMENT AND SUPPLEMENTAL CERTIFICATE OF CONFERENCE ON SAME; REQUEST SEC'S POSITION ON SAME; CALL WITH RECEIVER REGARDING ISSUES ON SAME; CALL WITH COURTROOM DEPUTY REGARDING SUPPLEMENT OF PWC TO FEE APPLICATION TO BE FILED ON DOCKET; CORRESPONDENCE WITH SEC COUNSEL AND PWC REGARDING CALL TO DISCUSS SUPPLEMENT AT SEC'S REQUEST.	3.50
09/08/26	ALAF	ATTEND TO INVESTOR INQUIRIES.	0.30
09/09/26	VEF1	RECEIVE AND REVIEW SUPPLEMENTAL CERTIFICATE OF CONFERENCE AND	0.40

Dykema 100 YEARS EST. 1926

DEBORAH D WILLIAMSON
DEBORAH WILLIAMSON

MATTER #: 122686.000002
INVOICE #: 3772194

OCTOBER 30, 2026

DATE	ID	DESCRIPTION	HOURS
		CHECK DOCKET FOR MATTERS PENDING FOR HEARING.	
09/09/26	DNR	CORRESPONDENCE WITH SEC COUNSEL REGARDING SUPPLEMENTAL CERTIFICATE OF SERVICE AND COMMISSION POSITION ON SAME.	0.40
09/09/26	DNR	CORRESPONDENCE WITH ILLINOIS SECRETARY OF STATE SECURITIES AGENT REGARDING DOCUMENT AND INFORMATION REQUEST; CORRESPONDENCE WITH TX OAG COUNSEL REGARDING DEMAND FOR REIMBURSEMENT OF STATE FUNDS FROM TEXAS RAILROAD COMMISSION REGARDING BARRON PETROLEUM.	0.40
09/09/26	DNR	RECEIVE AND PROCESS RECEIVER'S MAIL.	0.50
09/09/26	DNR	DRAFT AND SEND RESPONSE TO NOTICE OF INTENT TO LEVY AND SEIZE PROPERTY FROM IRS TO BARRON PETROLEUM.	0.40
09/10/26	DNR	CALL WITH SEC COUNSEL AND PWC REGARDING SEPTEMBER 14, 2026 HEARING; CALL WITH RECEIVER AFTER SAME; EXCHANGE EMAILS WITH HIGGS & JOHNSON ON SAME; UPDATE SEC REGARDING SAME.	2.00
09/10/26	DNR	RECEIVE AND REVIEW EMAIL REQUESTING INFORMATION FROM RECEIVER REGARDING FEEDER FUND; CORRESPONDENCE WITH SEC COUNSEL REGARDING SAME.	0.40
09/10/26	DNR	CORRESPONDENCE WITH AHUJA & CONSULTANTS REGARDING INTERNATIONAL WIRE TRANSFERS AND BANK STATEMENT QUESTIONS.	0.20
09/10/26	DADO	REVIEW AND RESPOND TO MULTIPLE INVESTOR INQUIRIES.	0.50
09/11/26	DNR	EMAILS WITH SEC COUNSEL REGARDING FEE APPLICATION HEARING AND PWC COUNSEL ITEMS; PROVIDE HEARING LINK, RECEIVERSHIP ORDER, RETENTION APPLICATION AND ORDER REGARDING PWC AS BAHAMIAN CONSULTANT, AND FEE APPLICATION WITH PWC SUPPLEMENT TO PWC'S COUNSEL.	1.00
09/11/26	DNR	CORRESPONDENCE WITH SEC COUNSEL AND ILLINOIS SECRETARY OF STATE SECURITIES AGENT REGARDING INFORMATION REQUEST OF RECEIVER; RECEIVE AND REVIEW ACCESS REQUEST LETTER.	0.70
09/11/26	DNR	RECEIVE AND PROCESS RECEIVER'S MAIL.	0.30
09/11/26	DNR	CORRESPONDENCE WITH TX OAG COUNSEL REGARDING NEW LETTERS DEMANDING PAYMENT TO RAILROAD COMMISSION OF TEXAS.	0.20
09/14/26	DNR	APPEAR BEFORE THE HON. HAL R. RAY, JR. AT SEPTEMBER 14, 2026 HEARING; RECEIVE AND REVIEW COURT'S SEPTEMBER 14, 2026 ORDER; PREPARE NOTICE OF HEARING IN ACCORDANCE WITH SAME; PROCESS PAYMENTS TO PROFESSIONALS WITH RECEIVER; CORRESPONDENCE WITH ILLINOIS SECURITIES SPECIAL AGENT REGARDING INFORMATION REQUEST TO RECEIVER.	1.40
09/14/26	DNR	DISCUSS OPEN FEE APPLICATION, PWC RETENTION, AND REPORTING ITEMS WITH RECEIVER; CORRESPONDENCE TO MR. SEARS REGARDING CALL REQUEST TO CONFER ON PENDING FEE APPLICATION; RECEIVE CORRESPONDENCE FROM	1.70

Dykema 100 YEARS EST. 1926

DEBORAH D WILLIAMSON
DEBORAH WILLIAMSON

MATTER #: 122686.000002
INVOICE #: 3772194

OCTOBER 30, 2026

DATE	ID	DESCRIPTION	HOURS
		PWC REGARDING CALL TO DISCUSS PENDING FEE APPLICATION AND SUPPLEMENT; DETAILED AND LENGTHY CORRESPONDENCE AND SUPPORTING DOCUMENTS TO HIGGS & JOHNSON REGARDING FEE APPLICATION, SUPPLEMENT, AND OTHER ISSUES PRESENTED AT SEPTEMBER 14, 2026 HEARING; PROVIDE UPDATE TO SEC COUNSEL REGARDING SAME.	
09/14/26	DNR	CALL WITH STRETTO REGARDING DISTRIBUTION CHECKS FOR LATE INVESTOR; CORRESPONDENCE TO RECEIVER REGARDING BANK'S AUTHORIZATION AND REQUIREMENTS TO COMPLETE SAME; CORRESPONDENCE WITH WAB AND STRETTO REGARDING PAYMENT APPROVAL OF DISTRIBUTION CHECKS; SUBMIT APPROVALS TO WAB.	0.80
09/14/26	DNR	CORRESPONDENCE WITH HIGGS & JOHNSON REGARDING BAHAMAS APPLICATION FILED BY PWC'S COUNSEL AND EMERGENCY HEARING REQUESTED ON SEPTEMBER 16, 2026 BEFORE JUSTICE GOMEZ.	0.30
09/14/26	DADO	REVIEW AND RESPOND TO INVESTOR INQUIRIES.	0.20
09/15/26	DNR	CORRESPONDENCE TO BROKER REGARDING STATUS OF PROPERTIES AND UPDATE REQUEST REGARDING SAME.	0.10
09/15/26	DNR	CALL WITH RECEIVER AND HIGGS & JOHNSON REGARDING APPLICATION OF PWC IN BAHAMAS PROCEEDING AND ISSUES PRESENTED IN U.S. CASE BY PWC; RECEIVE AND REVIEW AFFIDAVIT OF KEVIN CAMBRIDGE FROM HIGGS & JOHNSON FOR APPROVAL OF RETENTION OF SEARS & CO. AND APPROVAL OF COMPENSATION FOR SEARS & CO.; PROVIDE COMMENTS TO HIGGS & JOHNSON ON SAME, RETENTION DOCUMENTS IN U.S. COURT AND RECEIVERSHIP ORDER PROHIBITING SAME WITHOUT RECEIVER'S CONSENT.	1.40
09/15/26	DNR	REVIEW AND RESPOND TO INVESTOR INQUIRIES; COMPILE INVESTOR DOCUMENTS FOR ILLINOIS INVESTORS, AND DRAFT AND SEND WRITTEN LENGTHY RESPONSE LETTER TO ILLINOIS SECRETARY OF STATE SPECIAL SECURITIES AGENT IN RESPONSE TO REQUEST FOR INFORMATION; CORRESPONDENCE WITH RUSTIN BRUNSON REGARDING SETTLEMENT PAYMENT SUBMISSION TO RECEIVER.	2.70
09/15/26	DNR	RECEIVE AND REVIEW ACCOUNT ANALYSIS STATEMENT FROM IBC BANK; SEND SAME TO AHUJA & CONSULTANTS.	0.20
09/16/26	DNR	CORRESPONDENCE WITH HIGGS & JOHNSON REGARDING CALL WITH SEARS & CO. TO DISCUSS PENDING APPLICATION FOR RETENTION AS COUNSEL IN BAHAMIAN COURT ON BEHALF OF PWC.	0.40
09/16/26	DNR	CORRESPONDENCE WITH BROKER REGARDING PROPERTIES AND INTEREST UPDATE.	0.20
09/17/26	DNR	CALL WITH SEARS & CO., PWC, HIGGS & JOHNSON, AND DEBORAH D. WILLIAMSON REGARDING FILED APPLICATION BY SEARS & CO. ON BEHALF OF PWC IN BAHAMAS PROCEEDING, PENDING FEE APPLICATION IN U.S. COURT, AND ISSUES IDENTIFIED FOR OCTOBER 13, 2026 HEARING IN U.S. COURT (2.0); CALL WITH HIGGS & JOHNSON AND DEBORAH D. WILLIAMSON REGARDING	2.80

Dykema 100 YEARS EST. 1926

DEBORAH D WILLIAMSON
DEBORAH WILLIAMSON

MATTER #: 122686.000002
INVOICE #: 3772194

OCTOBER 30, 2026

DATE	ID	DESCRIPTION	HOURS
		ISSUES PRESENTED OUT OF CALL WITH PWC AND SEARS & CO. (.8).	
09/17/26	VEF1	RECEIVE AND PROFILE HGC REAL ESTATE MARKETING REPORT FOR GREEN HOME HOME AND PORT HOWE.	0.10
09/18/26	DNR	RECEIVE AND REVIEW CORRESPONDENCE FROM HIGGS & JOHNSON AND DEBORAH D. WILLIAMSON REGARDING SUBSEQUENT CALL WITH SEARS & CO. REGARDING POSITION ON BAHAMIAN PROCEEDING'S APPLICATION AND PWC'S RELIEF SOUGHT FROM JUSTICE GOMEZ.	0.30
09/21/26	DNR	CORRESPONDENCE WITH RUSTIN BRUNSON REGARDING SETTLEMENT CHECK RECEIVED; PROVIDE UPDATE TO SEC COUNSEL ON SAME.	0.30
09/22/26	DNR	RECEIVE AND PROCESS RECEIVER'S MAIL.	0.40
09/23/26	DNR	RECEIVE AND REVIEW INSURANCE RENEWAL INVOICE AND INFORMATION FROM PWC REGARDING BAHAMAS PROPERTIES.	0.50
09/24/26	DNR	CORRESPONDENCE FROM ALFRED SEARS REGARDING FOLLOW UP CONVERSATION ON PENDING PLEADINGS FOR PWC IN BAHAMAS AND U.S. COURTS.	0.10
09/25/26	DNR	CORRESPONDENCE WITH PWC REGARDING INSURANCE RENEWAL ITEMS FOR BAHAMAS PROPERTIES.	0.20
09/28/26	DNR	RECEIVE AND PROCESS RECEIVER'S MAIL.	0.40
09/28/26	DNR	CORRESPONDENCE WITH CAD COUNSEL REGARDING NOTICE OF INTENT TO FILE SUIT AND PROHIBITION OF SAME THROUGH RECEIVERSHIP ORDER; DRAFT AND SEND LETTER TO IRS RESPONDING TO NOTICE OF OUTSTANDING FUNDS DESPITE SETTLEMENT APPROVED BY COURT.	0.60
09/29/26	DNR	CORRESPONDENCE WITH MR. SEARS, HIGGS & JOHNSON, AND SEC COUNSEL REGARDING REQUEST FOR FURTHER DISCUSSION ON PWC FEE APPLICATION AND PLEADINGS FILED IN BAHAMAS COURT.	0.20
09/30/26	DNR	CORRESPONDENCE WITH MR. SEARS, HIGGS & JOHNSON, SEC COUNSEL, AND RECEIVER REGARDING REQUEST FOR CONTINUED SETTLEMENT CONFERENCE AVAILABILITY.	0.30
		TOTAL HOURS	**30.60**

TOTAL **$14,141.00**

Dykema 100 YEARS EST. 1926

DEBORAH D WILLIAMSON
DEBORAH WILLIAMSON

MATTER #: 122686.000002
INVOICE #: 3772194
PAGE 6

OCTOBER 30, 2026

BILLING SUMMARY

ID	TIMEKEEPER	HOURS	RATES	AMOUNT
DNR	DANIELLE R. BEHRENDS	28.70	475.00	13,632.50
DADO	DOMINIQUE A. DOUGLAS	1.10	330.00	363.00
VEF1	VICKI FLORES	0.50	153.00	76.50
ALAF	ADRIANNA LAFUENTE	0.30	230.00	69.00
	TOTAL	**30.60**		**$14,141.00**

Dykema 100 YEARS EST. 1926

DEBORAH D WILLIAMSON
DEBORAH WILLIAMSON

MATTER #: 122686.000002
INVOICE #: 3772194
PAGE 7

OCTOBER 30, 2026

DISBURSEMENTS

DATE	DESCRIPTION	AMOUNT
	PRINTING EXPENSES	72.70
	SCANNING	4.30
	TOTAL DISBURSEMENTS	**77.00**

Dykema 100 YEARS EST. 1926

DEBORAH D WILLIAMSON
DEBORAH WILLIAMSON

MATTER #: 122686.000002
INVOICE #: 3772194
PAGE 8

OCTOBER 30, 2026

TASK SUMMARY

TASK	TASK DESCRIPTION	HOURS	AMOUNT
B110	CASE ADMINISTRATION	17.40	8,030.50
B130	ASSET DISPOSITION	1.40	665.00
B210	BUSINESS OPERATIONS	4.00	1,900.00
B240	TAX ISSUES	1.40	665.00
B310	CLAIMS ADMINISTRATION & OBJECT	1.10	363.00
BT160	LITIGATION CONSULTING	5.30	2,517.50
	TOTAL	**30.60**	**14,141.00**

EXHIBIT E-2

HIGGS & JOHNSON

Counsel & Attorneys-at-Law

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

VAT INVOICE

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

Attn: Danielle Behrends

October 22, 2026
TIN: 100011726
Invoice No. 203425
TAAG

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

Professional Services

Date		Services	Hours	Amount
09/30/26	TAAG	Review and respond to email from Alfred Sears attaching memorandum regarding legal issues and statutory obligations of Joint Receivers as officers of the Bahamian Court; review and consider analysis concerning receivership fees, costs, and proposed resolution of the impasse in the receivership proceedings; consider same.	0.75	600.00
09/30/26	TAAG	Review emails from Alfred Sears and Danielle Behrends regarding meeting scheduling and availability with PwC and the Joint Receiver; respond.	0.50	400.00
10/01/26	TAAG	Received call from Alfred Sears regarding receivership fee dispute on October 1; review and analyze issues raised concerning applicable legal positions and proposed revisions to correspondence; report discussion and strategic considerations to Danielle Behrends and provide status update regarding anticipated response and client instructions.	0.75	600.00
10/01/26	TAAG	Review and consider amended correspondence from Alfred Sears following telephone conference; analyze revisions to legal arguments concerning		0.00

Professional Services

Date		Services	Hours	Amount
		receivership issues and assess implications for response strategy and ongoing negotiations; interoffice meetings.		
10/01/26	TAAG	Draft and transmit response letter to Danielle Behrends for review and approval; consider legal and strategic response to amended correspondence from opposing counsel and coordinate comments prior to issuance.	0.50	400.00
10/01/26	NRP	Review letter from Alfred Sears K.C; review and amend HJ letter in response to Mr. Sears.	2.25	956.25
10/01/26	ADH	Reviewing and considering case law, authorities and documents; preparing first draft legal response letter to Sears & Co;	5.50	3,300.00
10/02/26	TAAG	Review Danielle Behrends' comments on draft response letter and correspond regarding revisions and issuance of final correspondence; interoffice meetings.		0.00
10/02/26	NRP	Review email from Danielle Behrends on 2nd October 2026 and her changes to the draft letter. Address her comments within the letter and make relevant amendments.	1.25	531.25
10/05/26	TAAG	Review and consider email from Alfred Sears regarding receivership fee dispute, legal representation of Joint Receiver, and proposed basis for amicable resolution of outstanding issues.	0.50	400.00
10/05/26	TAAG	Review and consider correspondence from Deborah Williamson regarding discussions with PwC on proposed resolution of receivership fee application, revised fee submission strategy, and filing of Bahamian court report; analyze jurisdictional and procedural issues, provide strategic recommendations, correspond regarding proposed filing and Foreign Representative status, and review confirmation reserving rights in relation to the proposed court report.		0.00
10/05/26	NRP	Review email from Deborah Williamson and draft a reply to the same on 5th October 2026 re: filing the Bahamian court report.	0.75	318.75
10/06/26	TAAG	Analyze proposed filing, reporting language, jurisdictional issues, Foreign Representative status, fee approval provisions, and proposed amendments; provide preliminary comments and recommendations on the draft filing.	0.50	400.00
10/06/26	NRP	Review email from Danielle Behrends and Peter Hickman and the draft Court report. Make suggested	2.75	1,168.75

Client Name: Deborah D. Williamson
Client Ref: 035665 - 000101
Attorney: Tara A Archer-Glasgow
Matter Name: Receivership action SEC v. The Heartland Group Ventures, LLC et al.

Inv. Date: 10/22/26
Inv. No.: 203425
Page 3

Professional Services

Date		Services	Hours	Amount
		tracked changes to the court report, draft email to Danielle Behrends and Deborah Williamson on 6th October 2026.		
10/06/26	ADH	Reviewing and considering proposed Joint Receiver's Report with respect to issues and revisions.	1.50	900.00
10/07/26	TAAG	Review and consider correspondence among Danielle Behrends, PwC representatives, and others regarding the draft Bahamian court report, proposed disclosure of property valuation information, filing requirements, and hearing preparations; confer internally regarding appraisal values, reporting strategy, and filing issues, and correspond concerning matters arising from the draft report and related court filings.	0.50	400.00
10/07/26	NRP	Review email from Danielle Behrends and make further changes to Court Report; draft email in reply to Danielle on 7th October 2026.	2.00	850.00
10/08/26	TAAG	Review and consider correspondence to Alfred Sears regarding legal representation of the Joint Receiver, responsibility for legal costs under the U.S. Receivership Order, and issues arising from opposing counsel's position concerning the receivership proceedings.	0.50	400.00
10/08/26	TAAG	Review Danielle Behrends' correspondence regarding finalization of Bahamian court report and outstanding amendments required for filing.		0.00
10/08/26	TAAG	Review and consider correspondence from Valentino Hamilton regarding opposing counsel's position on receivership issues, jurisdiction of the Bahamian Court, and proposed resolution of the fee dispute.	0.25	200.00
10/08/26	TAAG	Review correspondence from Kevin Cambridge regarding draft Bahamian court report and proposed amendments; confer internally regarding receivership, jurisdictional, and fee approval issues.		0.00
10/08/26	TAAG	Review Danielle Behrends' email regarding draft court report; confer internally and respond concerning further review of proposed amendments.		0.00
10/08/26	TAAG	Review and consider correspondence with Danielle Behrends regarding strategy for proposed Bahamian court report, reporting obligations, fee application deadlines, and coordination with PwC; confer internally and correspond regarding legal position and efforts to resolve outstanding issues.		0.00
10/08/26	TAAG	Review and consider correspondence from Danielle	0.50	400.00

Professional Services

Date		Services	Hours	Amount
		Behrends and Peter Hickman regarding revisions to draft fee application materials, strengthened time narratives, proposed filing strategy, and status of the Bahamian court report and supporting appendices.		
10/08/26	NRP	Discuss the court report with Kevin Cambridge via telephone, review email from Kevin Cambridge, and Danielle Behreneds make further amendments to Court report and draft email to Danielle Behrends.	3.50	1,487.50
10/08/26	TAAG	Review and consider correspondence with Danielle Behrends regarding revisions to draft Bahamian court report; analyze proposed amendments, draft comparisons, and outstanding comments, and consider further response to PwC concerning revisions to the report.	0.50	400.00
10/08/26	ADH	Further, reviewing and considering proposed Joint Receiver's Report;; teleconference with Mr. Kevin Cambridge of PwC; further revising proposed Joint Report.	4.50	2,700.00
10/09/26	TAAG	Review Kevin Cambridge' correspondences regarding proposed revisions to the Bahamian court report and fee application materials, including issues concerning the Joint Receivers and filing strategy; provide instructions to team.		0.00
10/09/26	TAAG	Review and respond to correspondence with Danielle Behrends regarding revisions to Bahamian court report; analyze wording concerning appointment and powers of the Joint Receiver and provide comments on alignment with the Court orders and filing strategy; internal meeting.	0.50	400.00
10/09/26	TAAG	Review Danielle Behrends' correspondence regarding revisions to the Bahamian court report and compliance with the Bahamian orders and governing law.	0.25	200.00
10/09/26	TAAG	Review and consider correspondence from Danielle Behrends regarding status of U.S. court hearing and anticipated cancellation; assess implications for the receivership proceedings and ongoing finalization of the Bahamian court report.	0.50	400.00
10/09/26	TAAG	Review Peter Hickman' correspondence regarding timeline for filing the Bahamian court report and submission of the revised fee application.	0.25	200.00
10/09/26	TAAG	Review and respond to email from Danielle Behrends regarding scheduling a conference call with Deborah Williamson, and Higgs Johnson team members to discuss the latest draft of the Bahamian		0.00

Professional Services

Date		Services	Hours	Amount
		court report and next steps.		
10/09/26	NRP	Review Further emails from Kevin Cambridge and Peter Hickman on 9th October 2026, on contents, and effect further changes to the Court report and draft an email to Danielle Behreneds	2.50	1,062.50
10/09/26	ADH	Reviewing revisions to Report proposed by PwC; teleconferences with Mr. Kevin Cambridge of PwC; further revising proposed Joint Report based on further instructions.	2.75	1,650.00
10/13/26	TAAG	Call with Dykema and H&J team	0.50	400.00
10/13/26	NRP	Attend conference call with Deborah Williamson and Danielle Behrends.	0.50	212.50
10/16/26	TAAG	Review email from Danielle Rushing Behrends attaching revised draft with comments; consider proposed amendments, formatting revisions, and comments regarding U.S. Court approval requirements for fees and expenses; update and prepare document for further review and filing process.	0.50	400.00
10/16/26	TAAG	Review correspondence between Peter Hickman and Danielle Rushing Behrends regarding finalization of report and revised fee pack; consider status of report revisions, comments on latest draft, SEC review process, anticipated circulation to PwC, and timeline for filing in the Bahamas proceedings.	0.50	400.00
10/16/26	NRP	Review Court report from Danielle Behrends and make further changes. Draft an email to Kevin Cambridge and Peter Hickman containing the same and explaining the changes.	1.75	743.75
10/20/26	NRP	Review emails from Peter Hickman and Danielle Behrends and draft a reply to the same on 20th October 2026; finalise the Court report and send to PwC for final review before filing.	1.25	531.25
10/20/26	TAAG	Reviewed and considered email from Peter Hickman regarding proposed revisions to draft affidavit/evidence, including removal of references to insured values under the insurance coverage section; considered and attended to finalization of filing version.	0.50	400.00
10/20/26	TAAG	Reviewed correspondence from Peter Hickman and Danielle Rushing Behrends regarding revisions to the draft report for the Bahamian proceedings; considered proposed removal of valuation references to avoid any potential chilling effect on bids, and noted agreement on amendments to the	0.50	400.00

Client Name: Deborah D. Williamson Inv. Date: 10/22/26
Client Ref: 035665 - 000101 Inv. No.: 203425
Attorney: Tara A Archer-Glasgow
Matter Name: Receivership action SEC v. The Heartland Group Ventures, LLC et al.

Professional Services

Date		Services	Hours	Amount
		report, including revisions to paragraph 45 and retention only of property listing prices; consider same.		
10/21/26	NRP	Review emails from Peter Hickman and Kevin Cambridge and draft email to Deborah Williamson on 21st October 2026.	0.50	212.50
10/21/26	TAAG	Reviewed correspondence to Deborah Williamson regarding signature of finalized court report and filing requirements.		0.00
10/22/26	NRP	Draft email to Registrar Akeria Martin querying why the Court Report is not marked as filed and seeking her urgent assistance with having the same filed.	0.50	212.50
10/22/26	NRP	Draft email to Kevin Cambridge, Peter Hickman , Danielle Behrends and Deborah Williamson containing filed Court Report on 22nd October 2026.	0.25	106.25

Summary of Services

		Rate	Hours	Amount
TAAG	Tara A Archer-Glasgow - Partner	800.00	9.75	7,800.00
ADH	Audley D Hanna - Partner	600.00	14.25	8,550.00
NRP	Nicholas Pennerman - Associate	425.00	19.75	8,393.75
Total for Services				**$24,743.75**

Expenses

Date	Expenses	Amount	VAT
	Electronic Printing	440.00	44.00
Total Expenses		**$440.00**	
Sub Total		**$25,183.75**	
	VAT	2,518.38	
	Total for Services and Expenses	**$27,702.13**	

Please make payment in US$ Dollars
US$ Equivalent Includes $3.30 Wire Transfer Fee **$27,844.65**

EXHIBIT E-3

Ahuja & Consultants, Inc.
Certified Public Accountants

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

Invoice # 8241.HL
Invoice Date: 9/30/2026
Due Date: 10/31/2026

Bill To:
Dykema
Attn: Deborah Williamson

Q3 2026 BILLING SUMMARY

TASK	TASK DESCRIPTION	HOURS	AMOUNT
2900	Accounting/Auditing	6.40	$ 1,222.00

TOTAL **$ 1,222.00**

Ahuja & Consultants, Inc.
Certified Public Accountants

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

Invoice # 8241.HL
Invoice Date: 9/30/2026
Due Date: 10/31/2026

Bill To:
Dykema
Attn: Deborah Williamson

Q3 2026 BILLING SUMMARY

ID	TIMEKEEPER	TITLE	HOURS	RATE	AMOUNT
DS	Divya Shetty	Manager	1.00	$ 250.00	$ 250.00
JW	Jennifer Wallace	Senior Associate	5.40	$ 180.00	$ 972.00
		TOTAL	**6.40**		**$ 1,222.00**

Ahuja & Consultants, Inc.
Certified Public Accountants

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

Invoice # 8241.HL
Invoice Date: 9/30/2026
Due Date: 10/31/2026

Bill To:
Dykema
Attn: Deborah Williamson

Date	ID	Description	Task	Hours	Amount
7/14/2026	JW	Data entry and reconcile May and June 2026 IBC and Western Alliance Bank accounts and start preparing Q2 Standardized Fund Accounting Report (SFAR)	2900	4.00	$ 720.00
7/14/2026	DS	Review QuickBooks and the Q2 Standardized Fund Accounting Report (SFAR)	2900	0.70	$ 175.00
7/15/2026	JW	Update the Q2 Standard Financial Accounting Report (SFAR)	2900	0.70	$ 126.00
7/15/2026	DS	Review the Q2 Standard Financial Accounting Report (SFAR)	2900	0.30	$ 75.00
9/9/2026	JW	Data entry & reconcile July and August bank accounts IBC - X3863, WAB - X1565, X0955, X2548, X4056 and X5154	2900	0.70	$ 126.00

Total **$ 1,222.00**

Balance Due **$ 1,222.00**

EXHIBIT E-4

STRETTO

Case Name: Heartland

Summary of Hourly Fees

Date Range: 07/01/2026 - 07/31/2026

Role	Hours	Rate		Total
Director	0.3	$195.00		$58.50
Specialized Associate	1.4	$475.00		$665.00
Specialized Managing Director	0.6	$625.00		$375.00
Specialized Senior Associate	1.6	$475.00		$760.00
Specialized Senior Managing Director	0.5	$705.00		$352.50
			Total	**$2,211.00**

STRETTO

Case Name: Heartland

Time Detail

Date Range: 07/01/2026 - 07/31/2026

Date	Employee Name	Role	Task	Description	Hours
07/15/2026	Micheal Hale	Specialized Senior Associate	Case Administration	Review of bank data	0.2
				Subtotal 07/15/2026	**0.2**

Date	Employee Name	Role	Task	Description	Hours
07/21/2026	Banking Staff	Specialized Associate	Case Administration	Maintain bank account records for account administration	1.4
07/21/2026	Fred Brown	Specialized Senior Managing Director	Case Administration	Monitor deposit and distribution activities; review correspondence and draft responses	0.5
07/21/2026	Micheal Hale	Specialized Senior Associate	Case Administration	Review bank data for check image and communication with bank	0.9
07/21/2026	Robert Saraceni	Director	Case Administration	Review D. Behrends correspondence regarding retrieval of check image for a Class 5 creditor. Research and provide Disbursements Team with check details	0.2
07/21/2026	Robert Saraceni	Director	Case Administration	Corr. to D. Behrends on status of check image request	0.1
07/21/2026	Ruben Guevara	Specialized Senior Associate	Case Administration	Review ledger to determine the status of check no. 4035	0.3
07/21/2026	Stephen Cady	Specialized Managing Director	Case Administration	Review distributions related communication and activity, and advise team re: same	0.6
				Subtotal 07/21/2026	**4.0**

Date	Employee Name	Role	Task	Description	Hours
07/28/2026	Micheal Hale	Specialized Senior Associate	Case Administration	Review of bank data	0.2
				Subtotal 07/28/2026	**0.2**
				Total 07/01/2026 - 07/31/2026	**4.4**

STRETTO

Case Name: Heartland

Summary of Hourly Fees

Date Range: 08/01/2026 - 08/31/2026

Role	Hours	Rate		Total
Associate II	0.2	$97.50		$19.50
Associate III	0.2	$130.00		$26.00
Director	3.1	$195.00		$604.50
Specialized Director	0.1	$550.00		$55.00
Specialized Managing Director	0.6	$625.00		$375.00
Specialized Senior Associate	5.1	$475.00		$2,422.50
Specialized Senior Managing Director	0.4	$705.00		$282.00
			Total	**$3,784.50**

STRETTO

Case Name: Heartland

Time Detail

Date Range: 08/01/2026 - 08/31/2026

Date	Employee Name	Role	Task	Description	Hours
08/04/2026	Micheal Hale	Specialized Senior Associate	Case Administration	Review bank data	0.2
				Subtotal 08/04/2026	**0.2**

Date	Employee Name	Role	Task	Description	Hours
08/17/2026	Micheal Hale	Specialized Senior Associate	Case Administration	Review bank data and reconcile account for ledger detail report	0.5
				Subtotal 08/17/2026	**0.5**

Date	Employee Name	Role	Task	Description	Hours
08/26/2026	Micheal Hale	Specialized Senior Associate	Case Administration	Review bank data	0.2
08/26/2026	Stephen Cady	Specialized Managing Director	Case Administration	Review distributions related communication and activity, and advise team re: same	0.1
				Subtotal 08/26/2026	**0.3**

Date	Employee Name	Role	Task	Description	Hours
08/27/2026	Robert Saraceni	Director	Case Administration	Prepare files for supplement Class 4 and 4a distribution, prepare cover letter and send files to disbursements group.	1.9
08/27/2026	Robert Saraceni	Director	Case Administration	Review, research and respond to D. Behrends' correspondence regarding issuance of class 4 and 4a distribution to a "forfeit" investor.	0.4
				Subtotal 08/27/2026	**2.3**

Date	Employee Name	Role	Task	Description	Hours
08/28/2026	Fred Brown	Specialized Senior Managing Director	Case Administration	Oversee deposit and distribution activities; review correspondence and draft responses	0.3
08/28/2026	Micheal Hale	Specialized Senior Associate	Case Administration	Review distribution request, Coordinate check production, including import of data into case management system, and generation and quality control of check images	3.0
08/28/2026	Micheal Hale	Specialized Senior Associate	Case Administration	Review bank data and reconcile account for ledger detail report	0.4
08/28/2026	Robert Saraceni	Director	Case Administration	Review email from Stretto Disbursements Group and forward request to Receiver for signature on Heartland Disbursements Request form	0.1

Date	Employee Name	Role	Task	Description	Hours
08/28/2026	Stephen Cady	Specialized Managing Director	Case Administration	Review distributions related communication and activity, and advise team re: same	0.4
				Subtotal 08/28/2026	**4.2**

Date	Employee Name	Role	Task	Description	Hours
08/31/2026	Aimee Marshall	Associate	Case Administration	Generate service of 2026.08.31 Heartland Disbursement Checks mailing including printing and fulfillment	0.2
08/31/2026	Fred Brown	Specialized Senior Managing Director	Case Administration	Monitor deposit and distribution activities; review correspondence and draft responses	0.1
08/31/2026	Lisa Randa	Specialized Director	Case Administration	Review checks for quality control and fraud mitigation	0.1
08/31/2026	Micheal Hale	Specialized Senior Associate	Case Administration	Review distribution request, Coordinate check production, including import of data into case management system, and generation and quality control of check images	0.7
08/31/2026	Ricky Quang	Associate	Case Administration	Generate service of 2026.08.31 Heartland Disbursement Checks mailing including printing and fulfillment	0.2
08/31/2026	Robert Saraceni	Director	Case Administration	Review, research and respond to D. Behrends request for distribution information for a specific investor. Prepare worksheet containing all distribution data.	0.7
08/31/2026	Ruben Guevara	Specialized Senior Associate	Case Administration	Review check images for quality control and fraud mitigations	0.1
08/31/2026	Stephen Cady	Specialized Managing Director	Case Administration	Review distributions related communication and activity, and advise team re: same	0.1
				Subtotal 08/31/2026	**2.2**
				Total 08/01/2026 - 08/31/2026	**9.7**

STRETTO

Noticing Detail

Date of Service	Document(s) or Mailing Description	Number of Recipients	Method(s) of Service
8/31/2026	2026.08.31 Heartland Disbursement Checks	2	First Class Mail

STRETTO

Case Name: Heartland

Summary of Expenses

Date Range: 08/01/2026 - 08/31/2026

Description	Quantity	Rate	Total	Total Charges
Check Issuance	2	$1.25	$2.50	$2.50
Print	10	$0.10	$1.00	$1.00
Postage	2	$0.82	$1.64	$1.64
Envelopes	2	$0.20	$0.40	$0.40
			Total	**$5.54**

STRETTO

Case Name: Heartland

Summary of Hourly Fees

Date Range: 09/01/2026 - 09/30/2026

Role	Hours	Rate	Total
Associate	0.1	$97.50	$9.75
Director	0.8	$195.00	$156.00
Managing Director	0.5	$210.00	$105.00
Senior Associate	0.1	$135.00	$13.50
Specialized Associate	1.1	$475.00	$522.50
Specialized Director	1.4	$550.00	$770.00
Specialized Managing Director	0.5	$625.00	$312.50
Specialized Senior Associate	1.6	$475.00	$760.00
Specialized Senior Managing Director	0.2	$705.00	$141.00
		Total	**$2,790.25**

STRETTO

Case Name: Heartland

Time Detail

Date Range: 09/01/2026 - 09/30/2026

Date	Employee Name	Role	Task	Description	Hours
09/01/2026	Daniel Ramirez	Senior Associate	Case Administration	Correspondence with B. Saraceni regarding Heartland request	0.1
09/01/2026	Micheal Hale	Specialized Senior Associate	Case Administration	Review bank data and reconcile account for ledger detail report	0.4
09/01/2026	Naomi Rodriguez	Associate	Case Administration	Review of mailing details, including image counts, party lists, and postage verification	0.1
09/01/2026	Robert Saraceni	Director	Case Administration	Research and update master files for additional investor address and update W-9 files for new W-9 received	0.2
09/01/2026	Robert Saraceni	Director	Case Administration	Research and confirm address update for select investor	0.1
09/01/2026	Robert Saraceni	Director	Case Administration	draft correspondence to Receivers Office confirming release of supplemental Class 4 and 4a distribution to eligible investor	0.1
				Subtotal 09/01/2026	**1.0**

Date	Employee Name	Role	Task	Description	Hours
09/02/2026	Robert Saraceni	Director	Case Administration	Review, research and respond to D. Behrends request for additional distribution information for select investor	0.4
				Subtotal 09/02/2026	**0.4**

Date	Employee Name	Role	Task	Description	Hours
09/14/2026	Banking Staff	Specialized Associate	Case Administration	Review positive pay exception items for check decisioning	0.6
09/14/2026	Fred Brown	Specialized Senior Managing Director	Case Administration	Oversee deposit and distribution activities; review correspondence and draft responses	0.2
09/14/2026	Jenice Alduenda	Specialized Director	Case Administration	Connect with the client and the bank for positive pay decisioning	1.4
09/14/2026	Micheal Hale	Specialized Senior Associate	Case Administration	Review of positive pay exceptions	0.4
09/14/2026	Micheal Hale	Specialized Senior Associate	Case Administration	Review bank data and reconcile account for ledger detail report	0.2
09/14/2026	Pete Danpongchareon	Specialized Senior Associate	Case Administration	Positive pay decision	0.2
09/14/2026	Stephen Cady	Specialized Managing Director	Case Administration	Review distributions related communication and activity, and advise team re: same	0.4
				Subtotal 09/14/2026	**3.4**

Date	Employee Name	Role	Task	Description	Hours
09/18/2026	Micheal Hale	Specialized Senior Associate	Case Administration	Filing case distributions	0.3
				Subtotal 09/18/2026	**0.3**

Date	Employee Name	Role	Task	Description	Hours
09/21/2026	Micheal Hale	Specialized Senior Associate	Case Administration	Review of bank data	0.1
09/21/2026	Stephen Cady	Specialized Managing Director	Case Administration	Review distributions related communication and activity, and advise team re: same	0.1
				Subtotal 09/21/2026	**0.2**

Date	Employee Name	Role	Task	Description	Hours
09/28/2026	Banking Staff	Specialized Associate	Case Administration	Coordinate monthly reporting	0.5
09/28/2026	Brian Soper	Managing Director	Case Administration	Oversight and review of project related correspondence and case activity	0.5
				Subtotal 09/28/2026	**1.0**

Total 09/01/2026 - 09/30/2026 **6.3**

EXHIBIT F-1

Deborah D. Williamson

Member



Contact

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

Overview

For more than 40 years, clients have turned to Deborah Williamson for leadership and advice on bankruptcy and restructuring matters. Deborah is a national leader in bankruptcy law, and she leverages her experience and insight to advise clients across industries on counter-party risk, bankruptcy litigation, and asset acquisition.

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

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

Deborah has been named a leader in her field by Chambers USA since 2003 and clients recognize her as a "go to" practitioner in insolvency and restructuring. She has been listed on 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". She has also been included in The Best Lawyers in America© for more than 20 years.

She has served as President of the American Bankruptcy Institute, co-chair of the Bankruptcy and Insolvency Litigation Committee of the Litigation Section of the American Bar Association, chair of the SBOT Bankruptcy Law Section, Director and Regent American College of Bankruptcy, and Director and Secretary of American Board of

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

Certification.

.

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 purchaser of assets of 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 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**

Special litigation counsel to the chapter 11 trustee, Dennis Faulkner. Retained 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 exploration and production companies. Beginning in early 2009, Deborah advised TXCO's management in negotiations with their lenders. 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. Deborah was lead counsel, 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 representing a major supplier of fuel.

Bankruptcy and Restructuring — Healthcare

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

Counsel to 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**

Counsel to 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, including sale and licensing of intellectual property assets.

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

In re: AgriBioTech, Inc., Case No. 00-10533 District of Nevada, Las Vegas Chapter 11 Bankruptcy Case

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.

In re: Avado Brands, Inc, et al., Case No. 04-31555, Northern District of Texas, Dallas Division

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

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

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

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

Bankruptcy and Restructuring — 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**

Representation of 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

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

Bankruptcy and Restructuring — Real Estate

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

We were lead counsel in the representation of 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.

Bankruptcy and Restructuring — Asset Acquisition

Zhone Technologies, Inc.

Successful representation of Zhone Technologies, Inc. as U.S. counsel in its acquisition of assets from DZS Inc. through a Chapter 7 bankruptcy proceeding in the U.S. Bankruptcy Court for the Eastern District of Texas. With a total transaction value exceeding $30 million, this high-profile, cross-border deal involved complex coordination across jurisdictions—including assets and subsidiaries located in the United States, Canada, Australia, India, Korea, and beyond.

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.

Bankruptcy and Restructuring — Plan Mediator

Mediator in *FCI Sand Operations, LLC*, Case No. 25-80481, Northern District of Texas, a sand processing plant.

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.

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

Credentials

Education

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

Bar Admissions

- Texas, 1982

Professional Recognition

- Recipient of *The Center for American and International Law's* 2026 Michelle Mendez Serviam Award
- 2026 *Lawdragon* 500 Leading Global Bankruptcy and Restructuring Lawyers
- Recognized in *The Best Lawyers in America*®
  - Bankruptcy and Creditor Debtor Rights / Insolvency and Reorganization Law, 1995-2027
- Named a Texas Leading Lawyer in Bankruptcy/Restructuring by *Chambers USA*, 2003-2026
- Recognized as one of the "Top 50 Lawyers in Central/West Texas," *Texas Super Lawyers*®, 2022-2026
- Recognized in *Texas Super Lawyers*® for Bankruptcy: Business, 2003-2026
- Named to "*Lawdragon* 500 Leading U.S. Bankruptcy & Restructuring Lawyers," 2020, 2022, 2023-2025
- Martindale-Hubbell®AV®Preeminent™ Peer Review Rating, 1993-Present
- Recognized by *San Antonio Magazine* in "San Antonio's Top Attorneys":
  - Bankruptcy & Workout, 2019-2023, 2026
- Named to *The American Lawyer's* "South Trailblazers" list, 2022
- Recognized by *S.A. Scene*, as an "Outstanding Women in Law" for Bankruptcy, 2022
- Recipient of the *San Antonio Business Journal's* 2019 Outstanding Lawyer 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*

- Bexar County Women's Bar Association and Foundation, Belva Lockwood Outstanding Lawyer Award, 2026

Affiliations

Professional

- National Association of Federal Equity Receivers (NAFER), Board of Directors
- 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, 2013-2025
- 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
- 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

Danielle Rushing Behrends

Member



Contact

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

Overview

When clients face distressed and contentious 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. Danielle is an effective communicator, experienced litigator, problem solver, and trusted business partner.

Clients rely on Danielle for her proactive, resourceful, creative, and effective restructuring and litigation advice. She looks for practical solutions and works to build a strategic plan that aligns with her client's needs. Her experience includes local, national, and international businesses, particularly in the aerospace, automotive, financial, food and beverage, oil and gas/energy, retail, national fitness chain, healthcare, real estate, and transportation industries, Chapter 11 Trustees, and a federal court-appointed receiver. In particular, she has complex litigation experience in state and federal courts involving numerous governmental agencies.

Prior to joining Dykema, Danielle had the honor and privilege of learning from the Honorable Craig A. Gargotta, (now Chief) United States Bankruptcy Judge for the Western District of Texas, the Honorable Catherine M. Stone, Chief Justice (Ret.) of the Fourth Court of Appeals of Texas, and the Department of Justice's U.S. Trustee Program.

Areas of client focus

Practices

Corporate and Finance
Healthcare
Litigation
Restructuring and Bankruptcy

Industries

Energy and Natural Resources
Financial Services
Financial Services Litigation
Loan Workouts, Restructuring, and Bankruptcy

Experience

Danielle has federal and state agency experience involving Attorney General, Bureau of Indian Affairs, Bureau of Land Management, Centers for Medicare and Medicaid Services, Comptroller of Public Accounts, Federal Bureau of Investigations, Internal Revenue Service, Justice Department, Licensing and Regulatory

Affairs, Marshals Service, Railroad Commission, Secretary of State, Securities and Exchange Commission, Social Security Administration, and Workforce Commission.

Danielle's representative matters include:

Notable Litigation and Dispute Resolution

- Negotiated and obtained Court approval of sale of airplane, helicopter, oil and gas properties, personal property, and domestic commercial and residential real properties
- Negotiated and settled numerous pre-litigation demands for corporate clients.
- Obtained Court approval of $12M legal malpractice settlement, including bar order, involving AmLaw 100 international law firm.
- Obtained favorable, first-impression ruling against Railroad Commission of Texas for abandonment of pipeline interest and approximately 400 oil and gas wells throughout the State of Texas.

Chapter 11 Debtor Representation

- Counseled Gold’s Gym and related entities in the expedited and successful auction, sale, and confirmation processes during the global pandemic, resulting in $100 million sale and projected 100% payout for creditors and anticipated dividend for equity. In re GGI Holdings, Lead Case No. 20-31318 (Bankr. N.D. Tex.).
- Initiated a sale process for one the largest continuing care retirement communities in the country. In re Henry Ford Village, Inc., Case No. 20-51066 (Bankr. E.D. Mich.).
- Guided client in compliance and sale of land that went into bankruptcy to avoid foreclosure and the mounting costs of litigation related a failed sale process in Los Angeles, California. In re 110 West Properties, LLC, Case No. 19-24048 (Bankr. C.D. Cal.).
- Counseled a privately held oil and gas company with significant acreage in the Bakken region of North Dakota. Helped client run a sale process with several bidders for the debtor’s oil and gas assets during global pandemic. In re New Emerald Energy, LLC, Case No. 20-41754 (Bankr. N.D. Tex.).
- Guided oil and gas exploration and production company and affiliate with $146.5M book value and 38,000 leased acres in Oklahoma through sale and confirmation processes, complicated by numerous pre-petition class-action earthquake lawsuits. In re Red Fork (USA) Investments, Inc., Lead Case No. 18-70116 (Bankr. W.D. Tex.).
- Advised independent oil company, exploration and production company, and power company debtors with state-of-the-art steam flood operations in Kern River Valley, California, and estimated enterprise value of $175M-$195M through sale and confirmation processes. In re All American Oil & Gas Incorporated, Lead Case No. 18-52693 (Bankr. W.D. Tex.).

Chapter 7 Debtor Representation

- Counseled non-profit arts corporation through Chapter 7 bankruptcy, resulting from failed labor negotiations. In re Symphony Society of San Antonio, Case No. 22-50656 (Bankr. W.D. Tex.).

Receivership

- Obtained Court approval of claims procedure and distribution plan
- Objected to and obtained Court denial of $12M in alleged claims
- Successfully executed claims reconciliation and approval procedure in excess of $108M
- Obtained Court approval of interim and/or final distribution(s) to 771 allowed claimants

- 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 7 Trustee in In re Collins Asset Group, LLC and In re Hollins Holdings, Inc. (Bankr. W.D. Tex.).
- Represented Chapter 11 Trustee over former lawyer and law firm in one of largest cases filed in San Antonio. In re Chris Pettit & Associates, P.C. & Christopher John Pettit, Lead Case No. 22-50591 (Bankr. W.D. Tex.).

Creditor Representation

- Assisting a multinational food-products corporation in bankruptcy strategy and representation as unsecured and secured creditor.
- Counseling a Fortune 100 technology company in bankruptcy strategy and representation as unsecured and secured creditor.
- Assisting a multinational food-products corporation in bankruptcy strategy and representation as unsecured creditor.
- Counseling a Fortune 50 energy company in bankruptcy strategy and representation as unsecured and secured creditor.
- Advising national small business lender in bankruptcy strategy and representation as secured creditor.

Credentials

Education

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

Bar Admissions

- Texas, 2016

Professional Recognition

- Named to the *American Bankruptcy Institute's* "40 Under 40" list, 2026
- 2026 American Bar Association On the Rise -Top 40 Young Lawyers Awardee
- 2026 *Lawdragon* 500 Leading Global Bankruptcy and Restructuring Lawyers
- Recipient of the 35 Under 35 Award by Kappa Alpha Theta Fraternity, Inc., 2025
- Recognized in *Texas Super Lawyers*® as a Rising Star for Bankruptcy, 2025-2026
- Named to *Best Lawyers'* "Ones to Watch" list
  - Bankruptcy and Creditor Debtor Rights/Insolvency and Reorganization Law, 2023 and 2024
  - 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, 2026
- 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

- District 10 Nominating Committee for the Texas Bar Foundation
- Member, WDTX Local Bankruptcy Rules Committee
- Larry E. Kelly American Bankruptcy Inn of Court, 2015-Present
  - Bylaws Committee Co-Chair
  - Judge Monroe and Judge McConnell Scholarship and Writing Competition Selection Committee
- Texas Access to Justice Commission, Working Group 2024
- 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; Coffee & Counsel Attorney Mentor
- National Association of Federal Equity Receivers (NAFER), Member, Young Professionals Committee, Conference Committee, Judicial Outreach Committee
  - Co-editor of "A Pocket Guide to Federal Equity Receivers" (rev. 2025).
- Dykema Women's Business Initiative, Former 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, Fellow
- American Bankruptcy Institute; Code to Code Strength in Diversity Editorial Board
  - "Strength in Diversity" Column (2023)
  - "Code to Code" Column (2024)
  - "Building Blocks" Column (2025)
- William S. Sessions American Inn of Court, 2018-2021
- American Bar Association - ABA Young Lawyers Division Bankruptcy Law Committee Chair, 2021-2022

- Texas Young Lawyers Association
- Texas Bar College
- Phi Kappa Phi
- St. Mary's University Law Alumni Association
- San Antonio Legal Services Association (formerly San Antonio Bar Association's Community Justice Program), Board Secretary and Mentor, Volunteer Pro Bono Attorney
- Texas Rio Grande Legal Aid, Volunteer Pro Bono Attorney
- Leadership San Antonio, Class 48
- NAFER (National Association of Federal Equity Receivers) Conference Committee, Co-Chair, 2026-2028
- Recognized in *San Antonio Magazine's* "Top Attorneys in San Antonio" List:
    - Bankruptcy and Workout, 2026

Community

- Kappa Alpha Theta, Alumna
- 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, Bylaws Chair/Parliamentarian 2025-2026; 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.

Areas of client focus

Practices

Corporate and Finance
Restructuring and Bankruptcy

Industries

Loan Workouts, Restructuring, and Bankruptcy
Financial Services

Credentials

Education

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

- Howard University, B.A., 2018

Bar Admissions

- Alabama
- Texas
- New York

Professional Recognition

- *The National Black Lawyers* Top 40 Under 40 - Texas, 2026
- Named to *The Best Lawyers in America*® "Ones to Watch" list
    - Bankruptcy and Creditor Debtor Rights / Insolvency and Reorganization Law, 2027
- Recognized in *Texas Super Lawyers*® as a Rising Star for Bankruptcy; Securities & Corporate Finance, 2026

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

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

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

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-2

EXHIBIT F-3

HIGGS & JOHNSON

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

HIGGS & JOHNSON

AUDLEY D. HANNA, JR.

PARTNER

A skilled commercial litigator who is praised as 'excellent, particularly with regard to contract disputes, as well as labour disputes.'

Legal 500 Caribbean (2021)



ahanna@higgsjohnson.com
T: +1 242 502 5200
F: +1 242 502 5250
https://www.linkedin.com/in/audley-hanna-50479b28/

Higgs & Johnson
Ocean Centre, Montagu Foreshore
East Bay Street
P O Box N3247
Nassau, The Bahamas

Audley Hanna, Jr. specialises in various areas of Civil and Commercial Litigation, with a particular focus on employment law, admiralty law, insurance law, intellectual property litigation, and personal injury litigation. Audley has significant experience as Counsel in The Supreme Court of the Commonwealth of The Bahamas.

Audley holds a Bachelor of Arts (B.A.) degree from Fisk University in Psychology and English. He obtained his Bachelor of Law (LL.B.) degree, with First-Class Honours, from the University of Buckingham in England. Thereafter, he completed the Legal Profession Course and obtained his Master of Law (LL.M.) degree from Northumbria University.

Audley was called to the Bar of the Third Appellate District of the State of New York in 2008. He completed a Legal Education Certificate at the University of the West Indies and was called to the Bahamas Bar in 2010 becoming an Associate with Higgs & Johnson that same year. He was named a Senior Associate in 2017 and became a Partner in 2019.

Audley is listed as a recommended lawyer in the area of Dispute Resolution by Legal 500 Caribbean (2019-2025) and Chambers Global (2022-2025) and has contributed to numerous publications including co-authoring the Bahamas Chapter in Shipping for the Legal 500 Comparative Guide (2021) and International Franchising (2016).

PRACTICE AREAS

- Litigation
  - Commercial & Civil Litigation
  - Employment Law

  - Admiralty Law
- Intellectual Property
- Insolvency & Corporate Restructuring
- Commercial Transactions
- Tax

EDUCATION

- Fisk University (B.A.), Nashville, Tennessee, USA
- University of Buckingham (LL.B.), Buckingham, UK
- Northumbria University at Newcastle (Legal Profession Course), (LL.M.), Newcastle upon Tyne, UK
- Eugene Dupuch Law School (LEC), Nassau, Bahamas

BAR ADMISSIONS

- New York, 2008
- Bahamas, 2010

PROFESSIONAL MEMBERSHIPS

- Bahamas Bar Association
- American Bar Association
- New York Bar Association
- International Bar Association
- International Trademark Association

PUBLICATIONS

- Bahamas Class Actions Comparative Guide, Mondaq (2023)
- Legal 500 Country Comparative Guide – Shipping in The Bahamas (2021)
- Doing business in The Bahamas, Thomas Reuters Practical Law (2020 – 2021)
- Enforcement of Foreign Judgements in The Bahamas, Lexology, Getting the Deal Through (2020-2021)
- Contributor to The Bahamas Chapter. International Franchising, 2016

RECOGNITION

- Recommended Lawyer, Dispute Resolution, Legal 500 Caribbean (2019-2025)
- Up and Coming, Dispute Resolution, Chambers Global (2022-2025)



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

THE BAHAMAS ■ higgsjohnson.com

HIGGS & JOHNSON

NICHOLAS PENNERMAN

ASSOCIATE

npennerman@higgsjohnson.com
T: +1 242 502 5200
F: +1 242 502 5250
https://www.linkedin.com/in/nicholas-pennerman-b13628242/

Higgs & Johnson
Ocean Centre, Montagu Foreshore
East Bay Street
P O Box N3247
Nassau, The Bahamas



Nicholas Pennerman is an Associate in the Litigation and Commercial Transactions practice groups.

Nicholas attained his undergraduate and post graduate degrees in the United Kingdom, first earning an LL.B (Hons.) with Business from the University of Sussex in Brighton followed by completing the Legal Practice Course with an MSc in Law and Business from the University of Law in London. Nicholas subsequently completed his Legal Education Certificate with the Eugene Dupuch Law School in Nassau, The Bahamas

Nicholas was called to Bar of Commonwealth of The Bahamas in 2022. He became an Associate of the firm in 2023 following the completion of one year of pupilage.

PRACTICE AREAS

- Litigation
- Commercial Transactions

EDUCATION

- Eugene Dupuch Law School (Legal Education Certificate)
- University of Law (LPC with MSc in Law and Business)
- University of Sussex (LLB (Hons.) with Business)

BAR ADMISSIONS

- Bahamas, 2022

PROFESSIONAL MEMBERSHIPS

- Bahamas Bar Association

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.

EXHIBIT F-4

EXHIBIT F-5

Fred Brown

Fred leverages over 20 years of operational and business acumen in his role as Senior Managing Director. Overseeing Stretto Treasury & Cash Management Services, Fred is responsible for identifying opportunities for market growth, expanding the operational platform supporting this business line, and maintaining the company's nationwide network of bank partners. He oversees an established infrastructure of best-in-class technology and streamlined workflows, ensuring Stretto provides maximum efficiency in deposit and case management to its wide range of fiduciary clients. Prior to joining Stretto's team, Fred held senior positions at iMatrix and Kurtzman Carson Consultants.

Brian Soper

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

Stephen Cady

Stephen brings significant corporate restructuring, receivership, and claims administration expertise to his role as Director. With particular skill in project management and effective client collaboration, he routinely facilitates the development of automated workflows for challenging case-management operations. As a former Attorney with strong data analysis aptitude, Stephen negotiates legal and technical requirements to establish efficient processes. Clients value him for his attention-to-detail and ability to meet even the most stringent deadlines while consistently going above-and-beyond to get the job done. Stephen has been involved in numerous high-profile Chapter 11 cases, including Westinghouse Electric, Mahwah Bergen (Ascena Retail Group), and Neiman Marcus Group, as well as distributions for numerous post-confirmation and regulatory enforcement actions.

Robert Saraceni

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

Jenice Alduenda

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

Pete Danpongchareon

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

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.

Micheal Hale

In his role as Manager, Micheal 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.

Lisa Randa

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

Ruben Guevara

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

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

Banking Staff

Banking staff perform a variety of administrative functions for treasury and cash management including providing monthly reporting, reviewing positive pay for check approvals, maintaining bank account records and reconciling bank accounts and perform research and confirmations for wire transfers.