



Total fees and expenses for their most recent invoices are November EUR €3066.00 (USD \$3762.25)<sup>1</sup> and December EUR €3810.00 (USD \$4,675.02)<sup>2</sup>.

## **II. Munsch, Hardt**

As noted above, there are ongoing settlement discussions between the Receiver and ING. ING had expressed a desire to be free of any additional claims for the conduct at issue herein if it were to enter into a settlement with the Receiver. The Receiver's U.S. counsel was retained to provide a memorandum to the Receiver regarding points of U.S. law in regard to the proposed ING complaint and a summary of relevant Fifth Circuit case law addressing this issue. Munsch, Hardt's second and final invoice is for December fees in the amount of \$2744.00.

### **Senior Paralegal**

The senior paralegal's primary activities for the months of November and December continued to focus on correspondence with investors answering their claim questions, providing status updates and responding to several investors that had questions via email regarding the postcards the Receiver mailed in an attempt to validate their contact information. She also validated or updated their contact information and updated the investor spreadsheet and monitored the Receivership email box daily for general investor inquiries.

The senior paralegal worked a total of 9.75 hours for the months of November and December; her time was invoiced at \$50.00 per hour which is one-third of her normal hourly rate for a total of \$487.50.

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<sup>1</sup>XE:Convert EUR/USD (January 7, 2021). Retrieved from <https://www.xe.com/currencyconverter/convert/?Amount=3%2C066&From=EUR&To=USD>

<sup>2</sup>XE:Convert EUR/USD (January 7, 2021). Retrieved from <https://www.xe.com/currencyconverter/convert/?Amount=3%2C810&From=EUR&To=USD>

**PRAYER FOR RELIEF**

The Receiver requests the Court enter the proposed Order filed with this Motion to approve the payment of total expenses of USD \$11,698.77 referenced above. The expenses were both reasonable and necessary for the Receiver to fulfill his Court-ordered duties.

Respectfully submitted,

GUY HOHMANN

By: /s/ Guy Hohmann

Guy Hohmann

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**RECEIVER FOR THE PROPHETMAX AND  
IB CAPITAL RECEIVERSHIP ESTATES**

**CERTIFICATE OF CONFERENCE**

The Receiver conferred with Timothy Mulreany, counsel for the CFTC, who stated the CFTC does not take a position on the Motion nor the relief sought herein.

/s/ Guy Hohmann

Guy Hohmann

**CERTIFICATE OF SERVICE**

On January 11, I electronically submitted the foregoing document with the Clerk of the Court of the U.S. District Court, Western District of Texas, using the electronic case filing system of the court. I hereby certify that I have served all counsel and/or pro se parties of record electronically or by another manner authorized by Federal Rule of Civil Procedure 5(b)(2).

/s/ Guy Hohmann

Guy Hohmann



SIGNED this \_\_\_\_\_ day of \_\_\_\_\_, 2021.

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LEE YEAKEL  
UNITED STATES DISTRICT JUDGE