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14 GEOFF WINKLER

15 UNITED STATES DISTRICT COURT
16 CENTRAL DISTRICT OF CALIFORNIA
17 WESTERN DIVISION

18 SECURITIES AND EXCHANGE
19 COMMISSION,

20 Plaintiff,

21 v.

22 RALPH T. IANNELLI and ESSEX
23 CAPITAL CORP.,

24 Defendants.

Case No. 2:18-cv-05008-FMO-AFM

FIRST INTERIM APPLICATION OF
RECEIVER, GEOFF WINKLER, AND
ALLEN MATKINS LECK GAMBLE
MALLORY & NATSIS LLP, GENERAL
COUNSEL TO THE RECEIVER, FOR
PAYMENT OF FEES AND
REIMBURSEMENT OF EXPENSES
[December 21, 2018 - March 31, 2019]

[Notice of Application; Memorandum of
Points and Authorities; Declaration of
Geoff Winkler; and [Proposed] Order
submitted concurrently herewith]

Date: May 30, 2019
Time: 10:00 a.m.
Ctrm: 6D
Judge Hon. Fernando M. Olguin

25 **I. INTRODUCTION.**

26 Geoff Winkler (the "Receiver"), the Court-appointed permanent receiver for
27 Defendant Essex Capital Corporation ("Essex") and its subsidiaries and affiliates
28 (collectively, the "Receivership Entities" or "Entities"), along with his counsel of
record, Allen Matkins Leck Gamble Mallory & Natsis LLP ("Allen Matkins" or
"Professionals"), hereby submits this First Interim Application for Payment of Fees

1 and Reimbursement of Expenses (the "Application"). This Application is the first
2 interim application for reimbursement of fees and expenses submitted by the
3 Receiver and his Professionals, and covers the period from December 21, 2018
4 through March 31, 2019 (the "Application Period").

5 Pursuant to the Application, the Receiver and Allen Matkins seek approval of
6 100% of their fees and expenses and payment, on an interim basis, of 80% of their
7 fees and 100% of their expenses for the Application Period, as follows:

<u>Applicant</u>	<u>Current Fees Submitted for Approval</u>	<u>Current Expenses Submitted for Approval</u>	<u>Interim Payment Requested (Fees)</u>	<u>Interim Payment Requested (Expenses)</u>
Receiver	\$363,747.70	\$10,445.10	\$290,998.16	\$10,445.10
Allen Matkins	\$155,166.75	\$3,882.63	\$124,133.40	\$3,882.63
TOTAL:	\$518,914.45	\$14,327.73	\$415,131.56	\$14,327.73

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13 Consistent with the billing guidelines of the Plaintiff Securities and Exchange
14 Commission (the "Commission") and ordinary practice in federal receiverships of
15 this nature, the remaining, unpaid portion (20%), or "holdback," of the Receiver's
16 and Allen Matkins' fees will be requested for payment at the conclusion of this
17 receivership.

18 **II. GENERAL SUMMARY.**

19 As reflected in the Receiver's concurrently submitted First Interim Report and
20 Petition for Further Instructions (the "First Interim Report"), during the Application
21 Period, and with assistance from Allen Matkins, the Receiver made substantial
22 progress in satisfaction of his duties, as determined by the Court's December 21,
23 2018 Order Regarding Preliminary Injunction and Appointment of a Permanent
24 Receiver (the "Appointment Order") (Dkt. No. 66). Among other things, the
25 Receiver has: (1) Assumed exclusive authority and control over the Receivership
26 Entities and their assets ("Receivership Assets"); (2) commenced significant
27 discovery and investigation efforts aimed at better understanding the business and
28 financial activities of the Entities, and identifying potentially recoverable

1 Receivership Assets; (3) taken steps to preserve and prevent the dissipation of
2 already-identified Receivership Assets; (4) commenced a detailed accounting of the
3 Entities' transactions, in anticipation of submitting an accounting report to this
4 Court; and (5) established a receivership website and commenced a dialogue with
5 Receivership Entity investors and other creditors aimed at providing real-time
6 updates regarding the status and administration of the instant receivership.

7 A more detailed description of the work performed by the Receiver and Allen
8 Matkins during the Application Period appears below, and in the First Interim
9 Report. Given the amount and nature of the work completed by the Receiver and
10 Allen Matkins during the Application Period, they respectfully submit that the fees
11 and expenses incurred during the Application Period are appropriate, and should be
12 approved, and paid on an interim basis. As noted above, as an accommodation to
13 the receivership estate, and consistent with the Commission's billing guidelines and
14 ordinary practice in federal receiverships, the Receiver and Allen Matkins request
15 that the Court approve 100% of their fees and expenses incurred during the
16 Application Period, but authorize payment, on an interim basis, of 80% of their fees,
17 and 100% of their expenses, at this time.

18 **III. OVERVIEW OF THE RECEIVERSHIP CASE.**

19 The Court and interested parties are invited to review the following materials¹
20 for a general summary of the facts underlying the above-captioned action and the
21 activities of the Receiver and his Professionals during the Application Period:

- 22 • The Commission's Complaint, filed on June 5, 2018 (Dkt. No. 1);
- 23 • Intervenors' Notice of Motion and Motion to Intervene and Appoint
24 Monitor, filed on July 26, 2018 (Dkt. No. 32);
- 25 • Defendants' Answer to Complaint and Affirmative Defenses, filed on
26 August 1, 2018 (Dkt. No. 37);

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28 ¹ The identified materials, and more, are available on the Receiver's website,
www.essex-receivership.com

- Order Regarding Preliminary Injunction, entered on October 1, 2018, pursuant to which Geoff Winkler was appointed as monitor of the Receivership Entities (Dkt. No. 53);
- Report of Preliminary Accounting of Defendant Essex Capital Corporation and Recommendations; Declaration of Court-Appointed Monitor Geoff Winkler, filed on December 6, 2018 (Dkt. No. 60);
- The Appointment Order, entered on December 21, 2018 (Dkt. No. 66);
- Notice of Motion and Motion for Order in Aid of Receivership, filed on January 9, 2019 (Dkt. No. 67); and
- Order in Aid of Receivership ("Order in Aid"), entered on February 1, 2019 (Dkt. No. 69).

IV. SERVICES PERFORMED BY THE RECEIVER DURING THE APPLICATION PERIOD.

During the Application Period, the Receiver diligently pursued the objectives established by this Court's Appointment Order and Order in Aid. To that end, the Receiver performed services recorded in the following categories, as reflected in the following summary:

<u>Receiver's Category</u>	<u>Hours Worked</u>	<u>Receiver's Fees</u>
Financial – Accounting/Auditing	102.0	\$30,632.40
Financial – Business Analysis	17.8	\$4,966.20
Financial – Data Analysis	4.9	\$2,915.50
Financial – Forensic Accounting	612.2	\$154,427.10
Financial – Tax Issues	9.6	\$2,678.40
Legal – Business Operations	117.5	\$35,651.70
Legal – Case Administration	441.2	\$132,476.40
TOTAL:	1,305.20	\$363,747.70

Broadly, during the Application Period, and as reflected in the Receiver's First Interim Report, the Receiver and his staff undertook substantial efforts to understand the business and financial activities of the Receivership Entities, investigate and

1 recover Receivership Assets, and otherwise administer the estate of the Receivership
2 Entities. Specifically, the services performed by the Receiver during the
3 Application Period are described below, by category, and in more detail in the
4 Receiver's invoices, which are attached hereto as **Exhibit A**.

5 **A. Financial – Accounting/Auditing.**

6 The Receiver devoted significant time and effort to work in this category,
7 which included conducting the necessary accounting and auditing to determine
8 whether Essex could be operated as a going concern. Specifically, work within this
9 category included, but was not limited to, conducting a valuation of active leases,
10 factoring in lease asset depreciation and consulting with a valuations expert
11 regarding lease residual values, reviewing general accounting information with
12 respect to the Receivership Entities, and developing an understanding of the
13 information presented in the Entities' QuickBooks records. The Receiver and his
14 staff devoted time to gathering the Entities' financial records and reviewing their
15 transactions, in their capacity as the Entities operators. To that end, the Receiver
16 and his staff devoted time to transacting those portions of the Entities' business that
17 were viable.

18 **B. Financial – Business Analysis.**

19 During the Application Period, the Receiver devoted some time to work
20 within this category, which encompassed researching the metrics and analytics
21 behind the Receivership Entities' business, and communicating with Defendant
22 Ralph Iannelli regarding those metrics and analytics to obtain additional
23 information. In order to gain a better understanding of the business and financial
24 affairs of the Receivership Entities, the Receiver and his staff analyzed the Entities'
25 revenue sources, including, but not limited, active leases, and private equity
26 investments.

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1 **C. Financial – Data Analysis.**

2 The Receiver's staff performed limited work within this category, which
3 included the forensic imaging of hard drives obtained from the Receivership Entities
4 and digital asset recovery in the form of digital database file restoration.

5 **D. Financial – Forensic Accounting.**

6 The Receiver and his staff spent a considerable amount of time devoted to
7 commencing and undertaking a rigorous forensic accounting of the Receivership
8 Entities' records. To that end, the Receiver commenced his efforts by organizing
9 hundreds of thousands of pages of bank and brokerage statements, other financial
10 records, and other supporting documents to streamline the forensic accounting.
11 Thus far, the Receiver and his staff have identified, and are in the process of
12 reconciling, approximately 62,000 cash transactions across sixty-five (65) brokerage
13 accounts and fifty-three (53) bank accounts of the Receivership Entities, with entries
14 going back as far as Essex's founding in or around 1996.

15 The Receiver's identification and analysis of these transactions has required a
16 detailed review of voluminous financial materials related to bank and brokerage
17 account activity, including checks issued, deposits, and withdrawals, in order to
18 assess the amount of cash available and overall transaction history of the
19 Receivership Entities. Additionally, because the records obtained by the Receiver
20 from the Receivership Entities were incomplete and did not reflect the totality of the
21 Receivership Entities' transactions, the Receiver was also required to reconstruct or
22 supplement the records, including via a number of informal document requests and
23 subpoenas, in connection with the forensic accounting effort.

24 The Receiver and his staff have also identified a total of more than 6,000 non-
25 cash journal entries, which are in the process of being diligently reviewed as part of
26 the Receiver's ongoing forensic accounting. Further, the Receiver has identified and
27 analyzed approximately sixty (60) private equity investments that the Receivership
28 Entities participated in, dating back to 2006, in an effort to understand losses

1 associated with those investments and identify potential opportunities for recovery.
2 The Receiver has also analyzed, and continues to analyze, at least twenty (20)
3 QuickBooks files, containing information regarding the Receivership Entities'
4 transactions, dating back to the 1980s. In connection his with analysis of the
5 aforementioned financial materials and transactions, the Receiver has commenced
6 preparing an estimate of the overall loss to investors on a money-in, money-out
7 ("MIMO") basis.

8 As part of his forensic accounting, the Receiver and his staff also devoted
9 time, during the Application Period, to: (1) determining the value of Receivership
10 Assets; (2) identifying potential voidable transfers; (3) identifying third parties who
11 may be in possession of recoverable Receivership Assets; (4) and examining
12 instances in which Receivership Assets appear to have been transferred out of the
13 Receivership Entities without a concomitant return of value, or for a single party's
14 apparently unilateral benefit.

15 Additionally, during the Application Period, the Receiver developed a
16 preliminary accounting of transactions relating to Mr. Iannelli, in his individual
17 capacity, in part to facilitate settlement discussions between Mr. Iannelli and the
18 Commission, and to present to at the mediation between the parties to enable the
19 mediator to more accurately identify the categories and amounts of transactions that
20 might be implicated in settlement discussions. The Receiver is informed and
21 believes that this preliminary accounting substantially aided the parties in reaching a
22 settlement.

23 While his forensic accounting is incomplete, the Receiver has made
24 significant accounting progress during the Application Period. He continues to
25 make meaningful progress, and anticipates completing his forensic accounting in the
26 near future. The Receiver's comprehensive accounting efforts, which were
27 emphasized and given tremendous attention during the Application Period, are
28 directed toward developing a complete understanding of the Receivership Entities'

1 financial and business activities and, in turn, identifying and marshaling their assets
2 for the benefit of the Entities, their investors, and other creditors.

3 Likewise, and while ancillary to the primary purpose of the forensic
4 accounting, the Receiver also expects that his accounting will significantly facilitate
5 his administration of any eventual Court-approved claims process, and substantially
6 reduce the Receiver's and his Professionals' associated fees and expenses. In
7 addition, the Receiver's extensive forensic accounting work is expected to
8 streamline a number of future efforts in connection with the instant receivership,
9 including recovery efforts, thereby yielding significant benefits to the estate of the
10 Receivership Entities.

11 **E. Financial – Tax Issues.**

12 During the Application Period, the Receiver and his team reviewed tax
13 payments and conferred with counsel regarding the prospect of filing necessary or
14 appropriate tax returns. The Receiver and his staff also devoted time to preparing a
15 Form 1099-MISC for 2018.

16 **F. Legal – Business Operations.**

17 The Receiver expended considerable addressing business issues, particularly
18 as he assumed authority and control over the Receivership Entities and administered
19 their operations. Chiefly, time billed to this category encompasses the Receiver's
20 work in connection with administering monthly lease revenues and associated
21 accounts receivable, and loans to third parties and their associated collateral. The
22 Receiver spent considerable time within this category working with Montecito Bank
23 & Trust ("MBT") to ensure that its administrative processes for loan servicing were
24 consistent with the fiduciary nature of the Receiver's appointment, including, but not
25 limited to, MBT's preparation and production of monthly reconciliations, and MBT's
26 transaction and attorneys' fees. Time billed to this category also includes the
27 Receiver's communications with vendors and his review of pre-receivership vendor
28 files.

1 The Receiver also billed time in this category associated with his negotiations
2 with MUFG Union Bank, N.A. regarding the abandonment of 1486 East Valley
3 Road, Montecito, California 93108, the location at which the Receivership Entities
4 maintained a physical office.

5 **G. Legal – Case Administration.**

6 During the Application Period, the Receiver communicated extensively with
7 Allen Matkins regarding his administration of the Receivership Entities and their
8 estate, along with the legal work required to enable the Receiver to undertake those
9 efforts he deemed necessary, with particular attention to efforts regarding the
10 marshalling of Receivership Assets. Additionally, the Receiver and his staff billed
11 time for communications with investors, including hosting an in-person, town-hall
12 style meeting with Entity investors in Santa Barbara in February 2019. Thereafter,
13 the Receiver completed a telephonic town-hall meeting, largely attended by out-of-
14 state investors who were unable to attend the initial meeting personally.

15 Since then, the Receiver has endeavored to respond to investor and interested
16 party inquiries on an individual basis via email correspondence and telephone calls.
17 Additionally, during the Application Period, the Receiver also established a
18 receivership website for this matter (www.essex-receivership.com) which, among
19 other things, he is using as a means of communicating with Receivership Entity
20 investors. The Receiver has posted all of his filings to the website.

21 The Receiver also billed time within this category to establishing the
22 necessary infrastructure to conduct his forensic accounting via Valid8, a platform
23 which streamlines the collection of financial documents. To that end, the Receiver's
24 case administration efforts included, but were not limited to, organizing and
25 establishing digital statement review protocols, and attendant accounting processes.

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1 **V. SERVICES PERFORMED BY ALLEN MATKINS DURING THE**
2 **APPLICATION PERIOD.**

3 Allen Matkins was engaged by the Receiver on January 2, 2019 and the Court
4 approved its engagement as lead receivership counsel on February 1, 2019 (see Dkt.
5 No. 69). The Receiver selected Allen Matkins as his lead receivership counsel
6 because of the firm's extensive expertise in federal receivership matters, as well as
7 creditors' rights and litigation matters. Allen Matkins has served as counsel to
8 federal receivers in dozens of cases, has represented a variety of entities in
9 numerous bankruptcy matters, and has significant substantive experience in related
10 areas such as corporate and securities, real estate, and other matters.

11 During the Application Period, Allen Matkins staffed each task as efficiently
12 as it could, using a core team of attorneys, with specialized assistance as necessary.
13 As the Court may recall, Allen Matkins also agreed to discount its ordinary billing
14 rates by 10% for the duration of this matter, as well as not to charge the receivership
15 estate for travel time.

16 Detailed descriptions of the services rendered by Allen Matkins are contained
17 in **Exhibit B**, attached hereto. Biographical information of the Allen Matkins
18 attorneys who rendered significant services during the Application Period is
19 attached hereto as **Exhibit C**. During the Application Period, Allen Matkins
20 recorded its time in the following categories²:

- 21 1. General and Administrative;
- 22 2. General Receivership;
- 23 3. Asset Recovery & Management;
- 24 4. Investigation/Reporting;

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27 ² While Allen Matkins has made efforts to ensure that its billing entries are
28 consistent across categories, certain activities lend themselves to more than one
category, or may be difficult to categorize. In any event, **Exhibit B** reflects the
actual time spent by Allen Matkins attorneys, and contains accurate descriptions
of all services provided.

- 1 5. Investor Communications; and
- 2 6. Pending Litigation.

3 **A. General and Administrative.**

4 No attorney time was recorded to the "General and Administrative" category
5 during the Application Period. Indeed, only a total of \$397.08 in expenses,
6 reflecting certain parking and duplication expenses, were recorded to this category.

7 **B. General Receivership.**

8 Services in the "General Receivership" category relate to assisting the
9 Receiver in the administration of the receivership estate. During the Application
10 Period, Allen Matkins attorneys prepared and submitted the Receiver's Motion for
11 Order in Aid of Receivership (Dkt. No. 67, *et seq.*), which addressed a number of
12 the Receiver's estate administration recommendations. Allen Matkins also assisted
13 the Receiver in developing methods for identifying and securing Receivership
14 Assets, along with his document recovery and review, and forensic accounting
15 strategy. Among other things, Allen Matkins also assisted the Receiver with his
16 registration of the Commission's Complaint and the Appointment Order in other
17 districts, pursuant to 11 U.S.C. § 754, developed task-tracking protocols, prepared
18 for and attended meetings with parties critical to the Receiver's administration of the
19 estate, including representatives from MBT, and assisted the Receiver with certain
20 accounting matters in preparation for his participation in an April 4, 2019 mediation
21 between the Commission and Defendant Ralph Iannelli.

22 The following Allen Matkins attorneys billed time to the General
23 Receivership category during the Application Period:

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<u>Name</u>	<u>Title</u>	<u>Hourly Rate</u>	<u>Hours</u>	<u>Fees</u>
D. Zaro	Partner	\$742.50	1.8	\$1,336.50
J. del Castillo	Partner	\$562.50	40.9	\$23,006.25
N. Aspis	Associate	\$351.00	18.0	\$6,318.00
A. Engstrom	Associate	\$351.00	3.9	\$1,368.90
TOTAL:			64.6	\$32,029.65
Average Hourly Rate			\$495.82	
Total Expenses:				\$3,203.13

C. Asset Recovery & Management.

Services in the "Asset Recovery & Management" category relate directly to the Receiver's efforts to identify, secure, preserve, and recover Receivership Assets. During the Application Period, Allen Matkins assisted the Receiver in connection with these efforts, including via the preparation of demand and asset turnover letters, preparing and updating Receivership Asset tracking materials, evaluating potential litigation and other claims of the Receivership Entities, securing the termination of a pending lease on receivership property, and – most importantly – attending to a significant number of matters arising in connection with some of the Entities' largest (by dollar amount) transactions and assets, many of which implicate turnover or assignment claims in the millions of dollars.

The following Allen Matkins attorneys billed time to this matter during the Application Period:

<u>Name</u>	<u>Title</u>	<u>Hourly Rate</u>	<u>Hours</u>	<u>Fees</u>
D. Zaro	Partner	\$742.50	21.1	\$8,984.25
J. del Castillo	Partner	\$562.50	51.7	\$29,081.25
N. Aspis	Associate	\$351.00	21.5	\$7,546.50
M. Shapiro	Associate	\$445.50	2.7	\$1,202.85
TOTAL:			88.0	\$46,814.85
Average Hourly Rate			\$531.99	
Total Expenses:				\$0.00

1 **D. Investigation / Reporting.**

2 Services in the "Investigation / Reporting" category relate to the Receiver's
3 efforts to investigate the nature and location of Receivership Assets, along with the
4 business and financial activities of the Receivership Entities, and his preparation of
5 reports to the Court. During the Application Period, Allen Matkins provided
6 significant assistance to the Receiver in connection with the identification, recovery,
7 and review of documents relating to the Receivership Entities and their business and
8 financial activities, and with the compilation and presentation of conclusions
9 derived therefrom to the Court, in the form of the First Interim Report. This effort
10 involved coordinating the development of an initial investigation and discovery plan
11 with the Receiver, identifying appropriate subjects and entities, and preparing and
12 serving subpoenas and demand letters, as well as communicating with attorneys,
13 pre-receivership professionals, and representatives of recipients of the Receiver's
14 document requests. Throughout this process, the Receiver also regularly
15 communicated the results and status of its document recovery and review efforts to
16 the Receiver.

17 As to the Receiver's discovery efforts, during the Application Period, Allen
18 Matkins obtained numerous productions in response to its subpoenas and demand
19 letters, from various banks and financial institutions, pre-receivership professionals,
20 including attorneys and accountants, apparent Entity joint venturers, and others, and
21 reviewed these voluminous productions, as necessary, to assist the Receiver's
22 efforts. Finally, Allen Matkins prepared the First Interim Report, submitted
23 contemporaneously with this Application, which summarizes the Receiver's efforts
24 and preliminary conclusions.

25 The following Allen Matkins attorneys and staff billed time to this matter
26 during the Application Period:

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<u>Name</u>	<u>Title</u>	<u>Hourly Rate</u>	<u>Hours</u>	<u>Fees</u>
D. Zaro	Partner	\$742.50	11.4	\$8,464.50
J. del Castillo	Partner	\$562.50	41.6	\$23,400.00
N. Aspis	Associate	\$351.00	43.9	\$15,408.90
A. Engstrom	Associate	\$351.00	1.9	\$666.90
G. Lopez	Paralegal	\$274.50	2.8	768.60
S. Peng	Staff	\$274.50	2.0	549.00
TOTAL:			103.6	\$49,257.90
Average Hourly Rate			\$475.46	
Total Expenses:				\$49.02

E. Investor Communications.

The time billed to this matter reflects Allen Matkins' assistance to the Receiver in connection with communications with Entity investors and Allen Matkins' direct discussions with investors and investor representatives, at the Receiver's behest, including in-person and telephonic appearances at the educational, town-hall style meetings hosted by the Receiver at the inception of this matter to provide an overview of the receivership to investors. During the Application Period, Allen Matkins also assisted the Receiver in managing correspondence with investors regarding the status of the receivership, and assisted in developing a plan for specific investor communication issues relating the administration of the Receiver's Court-approved website.

The following Allen Matkins attorneys billed time to this matter during the Application Period:

<u>Name</u>	<u>Title</u>	<u>Hourly Rate</u>	<u>Hours</u>	<u>Fees</u>
M. Farrell	Partner	\$675.00	5.5	\$3,712.50
J. del Castillo	Partner	\$562.50	9.3	\$5,231.25
N. Aspis	Associate	\$351.00	0.5	\$175.50
TOTAL:			15.3	\$9,119.25
Average Hourly Rate			\$596.03	
Total Expenses:				\$0.00

F. Pending Litigation.

Services provided in the "Pending Litigation" category during the Application Period include the detailed analysis and management of all pre-receivership actions pending against the Receivership Entities, the preparation of materials and attendance at hearings and status conferences in connection with each of those actions, and the preparation of materials necessary to advise all courts in which litigation is pending of the litigation stay included in the Court's Appointment Order.

The following Allen Matkins attorneys billed time to this matter during the Application Period:

<u>Name</u>	<u>Title</u>	<u>Hourly Rate</u>	<u>Hours</u>	<u>Fees</u>
J. del Castillo	Partner	\$562.50	25.6	\$14,400.00
N. Aspis	Associate	\$351.00	10.1	\$3,545.10
TOTAL:			35.7	\$17,945.10
Average Hourly Rate			\$502.66	
Total Expenses:				\$233.40

VI. THE FEES AND EXPENSES INCURRED ARE REASONABLE AND SHOULD BE ALLOWED.

The Receiver and Allen Matkins respectfully submit that the fees and expenses each of them incurred during the Application Period were fair, reasonable, necessary, and significantly benefitted the estate of the Receivership Entities. Accordingly, as noted above, the Receiver and Allen Matkins request that this Court approve 100% of their respective fees and expenses incurred during the Application Period, and authorize the interim payments requested herein.

The billing rates charged by the Receiver and Allen Matkins in this matter are consistent with and comparable to those charged in the community on similarly complex matters. Further, and as described in the Memorandum of Points and Authorities submitted in support of this Application, the billing statements of the Receiver and Allen Matkins were submitted to the Commission for review prior to

1 the filing of this Application. The Commission has indicated it will not oppose the
2 Application.

3 **VII. CONCLUSION.**

4 For the foregoing reasons, and as requested in the concurrently submitted
5 Memorandum of Points and Authorities, the Receiver and Allen Matkins
6 respectfully request that this Court enter an order:

- 7 1. Granting the instant Application, in its entirety;
- 8 2. Approving the Receiver's fees, in the amount of \$363,747.70, and
9 expenses, in the amount of \$10,445.10;
- 10 3. Authorizing the Receiver to make an interim payment to himself in the
11 amount of 80% of his fees, or \$290,998.16 and 100% of his expenses, in the amount
12 of \$10,445.10, from the funds he presently holds for the administration and benefit
13 of the Receivership Entities;
- 14 4. Approving Allen Matkins' fees, in the amount of \$155,166.75, and
15 expenses, in the amount of \$3,882.63; and
- 16 5. Authorizing the Receiver to make an interim payment to Allen Matkins
17 in the amount of 80% of its fees, or \$124,133.40 and 100% of its expenses, in the
18 amount of \$3,882.63, from the funds he presently holds for the administration and
19 benefit of the Receivership Entities.

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Dated: April 30, 2019

ALLEN MATKINS LECK GAMBLE
MALLORY & NATSIS LLP
DAVID R. ZARO
JOSHUA A. DEL CASTILLO
NORMAN M. ASPIS

By: /s/ Joshua A. del Castillo
JOSHUA A. DEL CASTILLO
Attorneys for Receiver
GEOFF WINKLER

SEC v. Essex Capital Corporation
Summary of Fees of Receiver and Retained Personnel
December 21, 2018 - March 31, 2019
(Sorted in Chronological Order by Activity Category)

Attachment 1

Personnel	Item / Description	Date	Hours	Rate	Amount	Activity Category
Hall, John	Meet with GW to discuss logistics and planning (.8), serving notification of order (2.0), discuss order with Defendant's counsel (.5), review order and meet with GW (1.5) (N/C)	12/21/2018	0.00	279.00	0.00	Legal - Case Administration
Winkler, Geoffrey	Review order, call with SEC, call with Defendant's counsel, prepare for office visit, serve order (N/C)	12/21/2018	0.00	315.00	0.00	Legal - Case Administration
Winkler, Geoffrey	Call with parties, serve order, prepare for office visit (N/C)	12/24/2018	0.00	315.00	0.00	Legal - Case Administration
Hall, John	Case work and office winddown planning and preparation for onsite work with GW (N/C)	12/26/2018	0.00	279.00	0.00	Legal - Case Administration
Winkler, Geoffrey	Review documents to prepare for meeting, meeting with JBH (N/C)	12/26/2018	0.00	315.00	0.00	Legal - Case Administration
Winkler, Geoffrey	Meeting with JBH to prepare (N/C)	12/26/2018	0.00	315.00	0.00	Legal - Case Administration
Hall, John	Travel to airport (2.0)	12/26/2018	0.00	279.00	0.00	Travel
Winkler, Geoffrey	Travel to airport (2.0)	12/26/2018	0.00	315.00	0.00	Travel
Hall, John	Meet with defendant and counsel, office employees, office winddown activities	12/27/2018	14.10	279.00	3933.90	Legal - Case Administration
Winkler, Geoffrey	Gather supplies, inventory and shut down office, meeting with Defendant and counsel, meeting with employee	12/27/2018	14.10	315.00	4441.50	Legal - Case Administration
Winkler, Geoffrey	Meeting with Defendant, shut down office, work with vendors, meeting with staff	12/28/2018	8.60	315.00	2709.00	Legal - Business Operations
Hall, John	Meet with defendant and counsel, office employees, office winddown activities	12/28/2018	8.60	279.00	2399.40	Legal - Case Administration
Hall, John	Travel home from SB	12/28/2018	0.00	279.00	0.00	Travel
Winkler, Geoffrey	Travel home from SB	12/28/2018	0.00	315.00	0.00	Travel
Winkler, Geoffrey	Review records gathered onsite	12/31/2018	7.40	315.00	2331.00	Legal - Case Administration
Hall, John	Digital statement review and organization, organization of file system, reconciling transfers in Valid8, Accounting in QB and Valid8	1/2/2019	5.00	279.00	1395.00	Legal - Business Operations
Hall, John	Review dockets items and calls with counsel and GW	1/2/2019	3.00	279.00	837.00	Legal - Case Administration
Winkler, Geoffrey	Emails with Defendants counsel (.2), review accounts (5.2), setup post office box (.6), create website (1.8), call with counsel (.6)	1/2/2019	8.40	315.00	2646.00	Legal - Case Administration
Hall, John	Processing ~80 received boxes of ECC documents, moving non-critical documents to storage, moving 18 finance boxes	1/3/2019	12.00	279.00	3348.00	Legal - Case Administration
Winkler, Geoffrey	Inventory records and prepare for storage (8.9), call with computer forensics (.3)	1/3/2019	9.20	315.00	2898.00	Legal - Case Administration
Hall, John	Financial document review, discuss insurance issues with counsel	1/4/2019	8.00	279.00	2232.00	Legal - Business Operations
Winkler, Geoffrey	Review financial records (6.9), emails with counsel (.2), email with defendants counsel (.2), prepare website (.5)	1/4/2019	7.80	315.00	2457.00	Legal - Case Administration
Hall, John	Bank and brokerage accounting with Valid8	1/7/2019	2.50	279.00	697.50	Financial - Forensic Accounting
Hall, John	Bank and brokerage account review	1/7/2019	4.40	279.00	1227.60	Financial - Forensic Accounting
Winkler, Geoffrey	Update website (.4), review Essex emails (1.9), call with counsel (.5), call with Jefferies counsel (.3), review records (5.3)	1/7/2019	8.40	315.00	2646.00	Legal - Business Operations
Hall, John	Bank and brokerage account review	1/8/2019	8.00	279.00	2232.00	Financial - Forensic Accounting
Winkler, Geoffrey	Review documents, call with JBH	1/8/2019	8.30	315.00	2614.50	Legal - Case Administration
Hall, John	Bank and brokerage account review	1/9/2019	6.60	279.00	1841.40	Financial - Forensic Accounting
Hall, John	Call from counsel to discuss MBT loans (.5), discuss case with GW (.9)	1/9/2019	1.40	279.00	390.60	Legal - Business Operations
Winkler, Geoffrey	Review documents (6.8), calls and emails with investors (1.2), draft letter to investors (.4), call with JBH (.5)	1/9/2019	8.90	315.00	2803.50	Legal - Case Administration
Johnson, Robert	Forensic imaging of hard drives	1/10/2019	1.50	595.00	892.50	Financial - Data Analysis

SEC v. Essex Capital Corporation
Summary of Fees of Receiver and Retained Personnel
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(Sorted in Chronological Order by Activity Category)

Attachment 1

<u>Personnel</u>	<u>Item / Description</u>	<u>Date</u>	<u>Hours</u>	<u>Rate</u>	<u>Amount</u>	<u>Activity Category</u>
Hall, John	Bank and brokerage account review	1/10/2019	6.20	279.00	1729.80	Financial - Forensic Accounting
Winkler, Geoffrey	Meeting with forensic team, review documents	1/10/2019	6.80	315.00	2142.00	Financial - Forensic Accounting
Hall, John	Work through additional requests from counsel (1.0), call from counsel, create list of current loans cross referenced by file name (.8)	1/10/2019	1.80	279.00	502.20	Legal - Case Administration
Winkler, Geoffrey	Meeting with JBH, travel to/from airport (2.5)	1/10/2019	0.00	315.00	0.00	Travel
Johnson, Robert	Forensic imaging of hard drives	1/11/2019	1.30	595.00	773.50	Financial - Data Analysis
Hall, John	Bank and brokerage account review	1/11/2019	7.40	279.00	2064.60	Financial - Forensic Accounting
Hall, John	Call with counsel and GW	1/11/2019	0.60	279.00	167.40	Legal - Case Administration
Winkler, Geoffrey	Review documents (2.8), review email from defendants counsel (.3), call with counsel (.6), review documents (4.1)	1/11/2019	7.80	315.00	2457.00	Legal - Case Administration
Johnson, Robert	Forensic imaging of hard drives	1/13/2019	0.50	595.00	297.50	Financial - Data Analysis
Hall, John	Run expense reports, research expense files, analysis and report to GW	1/14/2019	2.30	279.00	641.70	Financial - Accounting/Auditing
Hall, John	Bank and brokerage account review	1/14/2019	6.00	279.00	1674.00	Financial - Business Analysis
Johnson, Robert	Forensic imaging of hard drives	1/14/2019	0.80	595.00	476.00	Financial - Data Analysis
Winkler, Geoffrey	Emails with MBT (.2), emails with defendant (.3), review boxes of documents (8.4)	1/14/2019	8.90	315.00	2803.50	Legal - Case Administration
Hall, John	Bank and brokerage account review	1/15/2019	2.50	279.00	697.50	Financial - Business Analysis
Hall, John	Preparation and attending call with counsel, recap call with GW	1/15/2019	6.00	279.00	1674.00	Legal - Case Administration
Winkler, Geoffrey	Meeting with counsel, discuss case strategy, call with UB, review documents and prepare for meeting	1/15/2019	10.20	315.00	3213.00	Legal - Case Administration
Winkler, Geoffrey	Travel to airport (2.0)	1/15/2019	0.00	315.00	0.00	Travel
Hall, John	Preparation and distribution of initial investor review	1/16/2019	2.40	279.00	669.60	Financial - Accounting/Auditing
Hall, John	Compilation and distribution of the needed bank records to counsel (1.5), call with counsel re legal expenses and contact info (0.5), cancelling various office accounts and requesting final statements (2.8), call with receiver (.9)	1/16/2019	5.70	279.00	1590.30	Legal - Case Administration
Winkler, Geoffrey	Meeting with counsel (.5), meeting with MBT (1.0), travel to office, remove assets, work with vendors, review documents (7.9)	1/16/2019	9.40	315.00	2961.00	Legal - Case Administration
Hall, John	Review of correspond and case discussion with receiver re: investor meeting prep (1.7), call with counsel, follow up discussion with receiver (1.), review and prep documents for shipping (4.8), case discussion with GW (.5)	1/17/2019	8.00	279.00	2232.00	Legal - Case Administration
Winkler, Geoffrey	Meeting with defendant, removal of person property from office, work with vendors, review corporate emails	1/17/2019	6.70	315.00	2110.50	Legal - Case Administration
Winkler, Geoffrey	Travel to airport (2.0)	1/17/2019	0.00	315.00	0.00	Travel
Adams, Jacob	Prepare forensic accounting	1/18/2019	0.80	270.00	216.00	Financial - Forensic Accounting
Hall, John	File management and organization of financial files and account files	1/18/2019	4.00	279.00	1116.00	Legal - Business Operations
Hall, John	Case call with JA and GW, follow up discussion with GW(1.5), call and follow up with counsel re leases (.5), identifying needed tax returns, scanning (2.)	1/18/2019	4.00	279.00	1116.00	Legal - Case Administration
Winkler, Geoffrey	Call with new staff (1.5), prepare documents for trip to SB, call with investors, review records in storage	1/18/2019	8.80	315.00	2772.00	Legal - Case Administration
Adams, Jacob	Prepare forensic accounting	1/21/2019	1.30	270.00	351.00	Financial - Forensic Accounting
Hall, John	Forensic accounting and work with staff	1/21/2019	1.50	279.00	418.50	Financial - Forensic Accounting
Winkler, Geoffrey	Review accounting files (2.1), emails with bank (.2), review paper records (6.0), call with counsel (.5)	1/21/2019	8.80	315.00	2772.00	Legal - Business Operations
Hall, John	Retrieve scanned documents and originals, update files, notify GW	1/21/2019	1.00	279.00	279.00	Legal - Case Administration

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(Sorted in Chronological Order by Activity Category)

Attachment 1

<u>Personnel</u>	<u>Item / Description</u>	<u>Date</u>	<u>Hours</u>	<u>Rate</u>	<u>Amount</u>	<u>Activity Category</u>
Hall, John	Retrieving documents for Defendant	1/21/2019	6.00	279.00	1674.00	Legal - Case Administration
Adams, Jacob	Prepare forensic accounting	1/22/2019	2.10	270.00	567.00	Financial - Forensic Accounting
Hall, John	Prepare for meeting (2.0), meet with investor re: claimants (1.8), conference call with counsel regarding investor meeting (1.0)	1/22/2019	3.80	279.00	1060.20	Legal - Case Administration
Winkler, Geoffrey	Draft presentation outline, call with counsel, emails with investors, emails with bank, compile investor call list	1/22/2019	4.30	315.00	1354.50	Legal - Case Administration
Winkler, Geoffrey	Prepare office for turnover, make final preparations for investor presentation	1/22/2019	2.20	315.00	693.00	Legal - Case Administration
Hall, John	Travel to airport (2.0)	1/22/2019	0.00	279.00	0.00	Travel
Winkler, Geoffrey	Travel to airport (2.0)	1/22/2019	0.00	315.00	0.00	Travel
Hall, John	Closing office, meeting with Defendant to turn over personal effects, surrendering office to landlord (3.0), prep for meeting, meet with individual investor, investor meeting (3.5), securing and mailing remaining files for processing (3.7)	1/23/2019	10.20	279.00	2845.80	Legal - Case Administration
Winkler, Geoffrey	Prepare office for turnover, meeting with Defendant, meeting with landlord, meeting with investors, investor presentation, gather documents	1/23/2019	12.20	315.00	3843.00	Legal - Case Administration
Adams, Jacob	Prepare forensic accounting	1/24/2019	3.50	270.00	945.00	Financial - Forensic Accounting
Rodarte, Pamela	Prepare forensic accounting	1/24/2019	1.30	125.00	162.50	Financial - Forensic Accounting
Hall, John	Test call and call with counsel (.7), document organization and review drive (2.3)	1/24/2019	3.00	279.00	837.00	Legal - Case Administration
Winkler, Geoffrey	Complete documents for counsel (4.7), call with counsel (.5), prepare for document delivery (.2), draft investor call outline (.8)	1/24/2019	6.60	315.00	2079.00	Legal - Case Administration
Hall, John	Travel to PDX (3.0)	1/24/2019	0.00	279.00	0.00	Travel
Winkler, Geoffrey	Travel to PDX (3.0)	1/24/2019	0.00	315.00	0.00	Travel
Adams, Jacob	Prepare forensic accounting	1/25/2019	5.30	270.00	1431.00	Financial - Forensic Accounting
Hall, John	Review of QuickBooks files	1/25/2019	3.40	279.00	948.60	Financial - Forensic Accounting
Rodarte, Pamela	Prepare forensic accounting	1/25/2019	3.60	125.00	450.00	Financial - Forensic Accounting
Hall, John	Testing preparation and investor call (1.5), call from investor who missed conference call (.4), reply to counsel's request for additional information on firms providing Essex services (.6)	1/25/2019	2.50	279.00	697.50	Legal - Case Administration
Winkler, Geoffrey	Make final updates to outline (.7), investor group call (1.0), review documentation (4.4)	1/25/2019	6.10	315.00	1921.50	Legal - Case Administration
Adams, Jacob	Prepare forensic accounting	1/28/2019	4.90	270.00	1323.00	Financial - Forensic Accounting
Paterson, Caroline	Prepare forensic accounting	1/28/2019	4.90	225.00	1102.50	Financial - Forensic Accounting
Winkler, Geoffrey	Call with vendor (.3), call with former employee (.4), call with counsel re banking (.4), review records (6.9), emails with vendor (.4)	1/28/2019	8.40	315.00	2646.00	Legal - Business Operations
Hall, John	Call with receiver and counsel (.5), call from investor, FAQ (.4), research and send along lease info to receiver (.5), work through accounting on Valid8, work with JA on bank account processing (3.5), account records review and bank account ordering and indexing (2.0), case discussion with GW (1.)	1/28/2019	7.90	279.00	2204.10	Legal - Case Administration
Adams, Jacob	Prepare forensic accounting	1/29/2019	8.40	270.00	2268.00	Financial - Forensic Accounting
Paterson, Caroline	Prepare forensic accounting	1/29/2019	2.30	225.00	517.50	Financial - Forensic Accounting
Rodarte, Pamela	Prepare forensic accounting	1/29/2019	2.30	125.00	287.50	Financial - Forensic Accounting
Hall, John	Review records, move to storage	1/29/2019	7.00	279.00	1953.00	Legal - Case Administration
Winkler, Geoffrey	Review boxes of records, sort and move to storage (7.0), call regarding staffing and records (.7)	1/29/2019	7.70	315.00	2425.50	Legal - Case Administration
Adams, Jacob	Prepare forensic accounting	1/30/2019	9.60	270.00	2592.00	Financial - Forensic Accounting

**SEC v. Essex Capital Corporation
Summary of Fees of Receiver and Retained Personnel
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Attachment 1

<u>Personnel</u>	<u>Item / Description</u>	<u>Date</u>	<u>Hours</u>	<u>Rate</u>	<u>Amount</u>	<u>Activity Category</u>
Rodarte, Pamela	Prepare forensic accounting FAQ call from investor (.3), review QB file for entity (2.1), review of ECC computer and report to receiver (3.5), work on accounting with JA (.4), bank account questions with	1/30/2019	0.90	125.00	112.50	Financial - Forensic Accounting
Hall, John	counsel (.7), call with GW (.4) Call with investor (.3), emails with investors (.2), call with counsel (.4), work with lessee on buyout (.5), review records (6.6), call with payroll re 1099s (.3)	1/30/2019	7.40	279.00	2064.60	Legal - Case Administration
Winkler, Geoffrey		1/30/2019	8.30	315.00	2614.50	Legal - Case Administration
Adams, Jacob	Prepare forensic accounting Call with investor (.4), emails with investors (.2), call with counsel (.3), call with Plaintiff (.5), call with vendor (.3), review records (6.8), emails with Defendant re lease (.3)	1/31/2019	7.20	270.00	1944.00	Financial - Forensic Accounting
Winkler, Geoffrey	Sorting files, final indexing of accounts, list of needed statements to counsel, packing up boxes and shipping to Jacob Adams (8.0), research files, analysis and sent along pre-2007 info to GW (2.5)	1/31/2019	8.80	315.00	2772.00	Legal - Business Operations
Hall, John		1/31/2019	10.50	279.00	2929.50	Legal - Case Administration
Adams, Jacob	Prepare forensic accounting	2/1/2019	5.40	270.00	1458.00	Financial - Forensic Accounting
Rodarte, Pamela	Prepare forensic accounting Review company email (3.4), emails with counsel re turnover (.2), emails with bank re freeze (.2), reconciliation (3.3), call with AG re NY project (.4), emails with MC re project staffing (.2)	2/1/2019	3.70	125.00	462.50	Financial - Forensic Accounting
Winkler, Geoffrey		2/1/2019	7.70	315.00	2425.50	Legal - Business Operations
Adams, Jacob	Prepare forensic accounting	2/4/2019	7.60	270.00	2052.00	Financial - Forensic Accounting
Rodarte, Pamela	Prepare forensic accounting Research into and reporting on leases, lenders, loans and promissory notes (6.4), create final two invoices for lessee (1.0)	2/4/2019	3.20	125.00	400.00	Financial - Forensic Accounting
Hall, John		2/4/2019	7.40	279.00	2064.60	Legal - Business Operations
Winkler, Geoffrey	Emails with JH re invoices, call with counsel, review order, review emails, update site	2/4/2019	2.20	315.00	693.00	Legal - Business Operations
Adams, Jacob	Prepare forensic accounting	2/5/2019	7.30	270.00	1971.00	Financial - Forensic Accounting
Hall, John	Forensic accounting, auditing and analysis	2/5/2019	8.20	279.00	2287.80	Financial - Forensic Accounting
Rodarte, Pamela	Prepare forensic accounting	2/5/2019	4.70	125.00	587.50	Financial - Forensic Accounting
Winkler, Geoffrey	Review and respond to emails re leases	2/5/2019	0.30	315.00	94.50	Legal - Business Operations
Kwan, Peter	Digital asset recovery - database file restoration	2/6/2019	0.80	595.00	476.00	Financial - Data Analysis
Adams, Jacob	Prepare forensic accounting	2/6/2019	1.10	270.00	297.00	Financial - Forensic Accounting
Hall, John	Forensic accounting, auditing and analysis	2/6/2019	2.30	279.00	641.70	Financial - Forensic Accounting
Paterson, Caroline	Prepare forensic accounting	2/6/2019	2.10	225.00	472.50	Financial - Forensic Accounting
Hall, John	Cataloguing promissory notes and loans, indexing and sending to team Meeting with PK to access digital data, meeting with EF re research, review mediation emails re scheduling, attendance	2/6/2019	1.90	279.00	530.10	Legal - Case Administration
Winkler, Geoffrey		2/6/2019	2.80	315.00	882.00	Legal - Case Administration
Adams, Jacob	Prepare forensic accounting	2/7/2019	4.80	270.00	1296.00	Financial - Forensic Accounting
Paterson, Caroline	Prepare forensic accounting	2/7/2019	1.50	225.00	337.50	Financial - Forensic Accounting
Rodarte, Pamela	Prepare forensic accounting Work with counsel re loan reconciliations (.4), emails with EF re research needs (.3), gather documents (.6), review records (5.3)	2/7/2019	6.20	125.00	775.00	Financial - Forensic Accounting
Winkler, Geoffrey		2/7/2019	6.60	315.00	2079.00	Legal - Business Operations
Hall, John	Lease management, cataloguing and indexing, file system cleanup and consolidation	2/7/2019	1.60	279.00	446.40	Legal - Case Administration
Adams, Jacob	Prepare forensic accounting	2/8/2019	9.10	270.00	2457.00	Financial - Forensic Accounting
Hall, John	Forensic accounting, auditing and analysis	2/8/2019	6.70	279.00	1869.30	Financial - Forensic Accounting
Paterson, Caroline	Prepare forensic accounting	2/8/2019	1.90	225.00	427.50	Financial - Forensic Accounting

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Attachment 1

<u>Personnel</u>	<u>Item / Description</u>	<u>Date</u>	<u>Hours</u>	<u>Rate</u>	<u>Amount</u>	<u>Activity Category</u>
Rodarte, Pamela	Prepare forensic accounting	2/8/2019	3.20	125.00	400.00	Financial - Forensic Accounting
Hall, John	Review potential causes of actions, follow up call and analysis with GW Emails with counsel (.1), call with counsel (.4), call with counsel for investor (.2), review records gathered onsite (3.1), emails with Defendant re lease residual (.2), gather docs (1.1), review mail (.4), emails with JH (.2)	2/8/2019	4.60	279.00	1283.40	Legal - Case Administration
Winkler, Geoffrey		2/8/2019	5.80	315.00	1827.00	Legal - Case Administration
Adams, Jacob	Prepare forensic accounting	2/11/2019	6.60	270.00	1782.00	Financial - Forensic Accounting
Frost, Edward	Prepare background investigation	2/11/2019	0.50	575.00	287.50	Financial - Forensic Accounting
Hall, John	Forensic Accounting, routing statements, intaking brokerage statements	2/11/2019	8.20	279.00	2287.80	Financial - Forensic Accounting
Rodarte, Pamela	Prepare forensic accounting	2/11/2019	3.30	125.00	412.50	Financial - Forensic Accounting
Winkler, Geoffrey	Call with Plaintiff, review residual buyout proposal, call with counsel, email with valuation team, emails with bank re reconciliations and wire transfers	2/11/2019	1.80	315.00	567.00	Legal - Business Operations
Adams, Jacob	Prepare forensic accounting	2/12/2019	8.50	270.00	2295.00	Financial - Forensic Accounting
Hall, John	Forensic Accounting, analysis, and transaction and transfer tie out	2/12/2019	6.00	279.00	1674.00	Financial - Forensic Accounting
Rodarte, Pamela	Prepare forensic accounting	2/12/2019	1.40	125.00	175.00	Financial - Forensic Accounting
Winkler, Geoffrey	Review research, research and prepare information, call with Plaintiff, work with bank re wire transfer	2/12/2019	1.50	315.00	472.50	Legal - Business Operations
Hall, John	Work with vendor for office finalization	2/12/2019	0.50	279.00	139.50	Legal - Case Administration
Adams, Jacob	Prepare forensic accounting	2/13/2019	6.80	270.00	1836.00	Financial - Forensic Accounting
Hall, John	Forensic accounting	2/13/2019	7.30	279.00	2036.70	Financial - Forensic Accounting
Hall, John	Call with counsel, research on CE (1.5), work with vendors (.6)	2/13/2019	2.10	279.00	585.90	Legal - Case Administration
Adams, Jacob	Prepare forensic accounting	2/14/2019	5.50	270.00	1485.00	Financial - Forensic Accounting
Hall, John	Discuss forensic accounting approach and planning with GW (1.5), discuss forensic accounting approach and planning with JA (1.5), researching CE (4.0)	2/14/2019	7.00	279.00	1953.00	Financial - Forensic Accounting
Hall, John	Researching CE (.5), investor call (.5) Emails with counsel re former consultant (.2), respond to investor emails (.3), review records (5.6)	2/14/2019	1.00	279.00	279.00	Legal - Case Administration
Winkler, Geoffrey	Prepare accounts payable (.2), discussion re staffing for accounting (.4), review records (5.2)	2/14/2019	6.10	315.00	1921.50	Legal - Case Administration
Winkler, Geoffrey		2/15/2019	5.80	315.00	1827.00	Financial - Accounting/Auditing
Adams, Jacob	Prepare forensic accounting	2/15/2019	6.40	270.00	1728.00	Financial - Forensic Accounting
Hall, John	Forensic accounting and support of developing knowledge base for staff	2/15/2019	3.80	279.00	1060.20	Financial - Forensic Accounting
Adams, Jacob	Prepare forensic accounting	2/18/2019	5.30	270.00	1431.00	Financial - Forensic Accounting
Hall, John	Modelling effects of depreciating reporting v. actual, conversation with CPA and document review on lease asset depreciation	2/19/2019	2.10	279.00	585.90	Financial - Accounting/Auditing
Hall, John	Review of accounting materials from accountant	2/19/2019	2.30	279.00	641.70	Financial - Accounting/Auditing
Hall, John	Work with valuation experts on lease residual value	2/19/2019	0.50	279.00	139.50	Financial - Accounting/Auditing
Adams, Jacob	Prepare forensic accounting	2/19/2019	6.60	270.00	1782.00	Financial - Forensic Accounting
Hall, John	Process management discussion and project development with JA	2/19/2019	1.80	279.00	502.20	Financial - Forensic Accounting
Hall, John	Correspond with counsel on document subpoena questions	2/19/2019	0.90	279.00	251.10	Legal - Case Administration
Hall, John	Review investor question with counsel and respond Call with JH to discuss case (.5), discussion with counsel re vendors (.4), discussion with valuation team (.3), review investor, partnership files (7.1)	2/19/2019	0.50	279.00	139.50	Legal - Case Administration
Winkler, Geoffrey		2/19/2019	8.30	315.00	2614.50	Legal - Case Administration
Hall, John	Review of accounting materials from accountant	2/20/2019	1.50	279.00	418.50	Financial - Accounting/Auditing

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<u>Personnel</u>	<u>Item / Description</u>	<u>Date</u>	<u>Hours</u>	<u>Rate</u>	<u>Amount</u>	<u>Activity Category</u>
Winkler, Geoffrey	Review emails (1.9), reconcile lease payments and deposit wire (2.2), review potential buyout (.4), emails with Defendant re lease (.3), IRS letter (.3), emails with Plaintiff (.2), review records (2.1)	2/20/2019	7.40	315.00	2331.00	Financial - Accounting/Auditing
Turk, Matthew	Prepare forensic accounting	2/20/2019	3.30	235.00	775.50	Financial - Forensic Accounting
Hall, John	Review and respond to operation questions	2/20/2019	0.80	279.00	223.20	Legal - Business Operations
Hall, John	All hands meeting with receiver and counsel	2/20/2019	1.50	279.00	418.50	Legal - Case Administration
Hall, John	Call with investor re: FAQ	2/20/2019	0.60	279.00	167.40	Legal - Case Administration
Hall, John	Review investor questions, work with counsel, respond to investor	2/20/2019	0.30	279.00	83.70	Legal - Case Administration
Adams, Jacob	Prepare forensic accounting	2/21/2019	4.80	270.00	1296.00	Financial - Forensic Accounting
Hall, John	Forensic accounting and coordination with JA	2/21/2019	2.10	279.00	585.90	Financial - Forensic Accounting
Paterson, Caroline	Prepare forensic accounting	2/21/2019	2.40	225.00	540.00	Financial - Forensic Accounting
Hall, John	2018 1099 misc. preparation	2/21/2019	2.30	279.00	641.70	Financial - Tax Issues
Hall, John	Asset research request from counsel	2/21/2019	0.80	279.00	223.20	Legal - Case Administration
Winkler, Geoffrey	Review response from outside counsel, review and respond to investor emails, call with investor's counsel	2/21/2019	2.20	315.00	693.00	Legal - Case Administration
Adams, Jacob	Prepare forensic accounting	2/22/2019	0.90	270.00	243.00	Financial - Forensic Accounting
Hall, John	Forensic accounting brokerage accounts	2/22/2019	6.00	279.00	1674.00	Financial - Forensic Accounting
Hall, John	Work through data with TM for Valid8, accounting process for brokerage statements	2/22/2019	0.80	279.00	223.20	Financial - Forensic Accounting
Hall, John	Work with TM on Valid8 questions	2/22/2019	1.10	279.00	306.90	Financial - Forensic Accounting
Paterson, Caroline	Prepare forensic accounting	2/22/2019	1.10	225.00	247.50	Financial - Forensic Accounting
Hall, John	Discussion with counsel regarding CE	2/22/2019	0.30	279.00	83.70	Legal - Case Administration
Winkler, Geoffrey	Review investor and customer records (7.4), respond to emails (.3), call with JBH (.3)	2/22/2019	8.20	315.00	2583.00	Legal - Case Administration
Adams, Jacob	Prepare forensic accounting	2/25/2019	2.70	270.00	729.00	Financial - Forensic Accounting
Gutierrez, Jr., Eduardo	Prepare forensic accounting	2/25/2019	1.30	205.00	266.50	Financial - Forensic Accounting
Hall, John	Forensic accounting brokerage accounts and associated investigations and documents requests	2/25/2019	7.20	279.00	2008.80	Financial - Forensic Accounting
Hood, Chase	Prepare forensic accounting	2/25/2019	0.60	235.00	141.00	Financial - Forensic Accounting
Paterson, Caroline	Prepare forensic accounting	2/25/2019	4.10	225.00	922.50	Financial - Forensic Accounting
Turk, Matthew	Prepare forensic accounting	2/25/2019	0.80	235.00	188.00	Financial - Forensic Accounting
Hall, John	W9 research and call to PP regarding filing system	2/25/2019	0.60	279.00	167.40	Financial - Tax Issues
Hall, John	Call from counsel, discuss data questions, research and follow up re: same	2/25/2019	0.40	279.00	111.60	Legal - Case Administration
Winkler, Geoffrey	Emails with counsel re litigation discussion	2/25/2019	0.20	315.00	63.00	Legal - Case Administration
Adams, Jacob	Prepare forensic accounting	2/26/2019	6.10	270.00	1647.00	Financial - Forensic Accounting
Hall, John	Forensic accounting brokerage accounts and associated investigations and documents requests	2/26/2019	8.00	279.00	2232.00	Financial - Forensic Accounting
Winkler, Geoffrey	Email with CW re background	2/26/2019	0.10	315.00	31.50	Legal - Case Administration
Adams, Jacob	Prepare forensic accounting	2/27/2019	3.30	270.00	891.00	Financial - Forensic Accounting
Gutierrez, Jr., Eduardo	Prepare forensic accounting	2/27/2019	4.70	205.00	963.50	Financial - Forensic Accounting
Hall, John	Forensic accounting brokerage accounts and associated investigations and documents requests	2/27/2019	6.80	279.00	1897.20	Financial - Forensic Accounting

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<u>Personnel</u>	<u>Item / Description</u>	<u>Date</u>	<u>Hours</u>	<u>Rate</u>	<u>Amount</u>	<u>Activity Category</u>
Turk, Matthew	Prepare forensic accounting	2/27/2019	5.90	235.00	1386.50	Financial - Forensic Accounting
Hall, John	Working conference call with counsel, associated prep work	2/27/2019	1.20	279.00	334.80	Legal - Case Administration
Winkler, Geoffrey	Call with counsel for investor (.5), team call with counsel (1.0)	2/27/2019	1.50	315.00	472.50	Legal - Case Administration
Adams, Jacob	Prepare forensic accounting	2/28/2019	4.50	270.00	1215.00	Financial - Forensic Accounting
Gutierrez, Jr., Eduardo	Prepare forensic accounting	2/28/2019	2.80	205.00	574.00	Financial - Forensic Accounting
Hall, John	Forensic accounting brokerage accounts and associated investigations and documents requests	2/28/2019	5.80	279.00	1618.20	Financial - Forensic Accounting
Paterson, Caroline	Prepare forensic accounting	2/28/2019	2.00	225.00	450.00	Financial - Forensic Accounting
Hall, John	Message from and call to affected investor	2/28/2019	0.50	279.00	139.50	Legal - Case Administration
Hall, John	Work involving the research and documentation of CE, several emails with Defendant	2/28/2019	1.60	279.00	446.40	Legal - Case Administration
	Call with counsel for special litigation (.5), emails with counsel re lease buyout (.2), review documents received (.8), call with counsel re calculations (.4), review and calculate lease buyouts (.6), review new documents (2.8)	2/28/2019	5.30	315.00	1669.50	Legal - Case Administration
Winkler, Geoffrey	Prepare forensic accounting	3/1/2019	1.20	270.00	324.00	Financial - Forensic Accounting
Adams, Jacob	Forensic accounting brokerage accounts and associated investigations and documents requests	3/1/2019	4.20	279.00	1171.80	Financial - Forensic Accounting
Hall, John	Prepare forensic accounting	3/1/2019	4.00	235.00	940.00	Financial - Forensic Accounting
Turk, Matthew	Call with customer re: lease buyout and associated work with GW	3/1/2019	0.60	279.00	167.40	Legal - Business Operations
Hall, John	Instruct MBT with Defendant and GW forwarding addresses	3/1/2019	0.30	279.00	83.70	Legal - Business Operations
Hall, John	Review lease and payment history research	3/1/2019	0.90	279.00	251.10	Legal - Business Operations
Hall, John	Call to/from and associated work with counsel	3/1/2019	0.80	279.00	223.20	Legal - Case Administration
Hall, John	Production of index for counsel	3/1/2019	1.50	279.00	418.50	Legal - Case Administration
Hall, John	Prepare new documents for counsel	3/1/2019	0.20	279.00	55.80	Legal - Case Administration
	Call with counsel (.4), call with lessee (.3), review company emails (.8), review request from defendant and emails with counsel (.3), update investor website and email to investors (.5), review new documents (3.4)	3/1/2019	5.70	315.00	1795.50	Legal - Case Administration
Winkler, Geoffrey	Prepare forensic accounting	3/4/2019	10.20	270.00	2754.00	Financial - Forensic Accounting
Adams, Jacob	Forensic accounting, assisting JA and brokerage statements	3/4/2019	7.10	279.00	1980.90	Financial - Forensic Accounting
Hall, John	Prepare forensic accounting	3/4/2019	2.60	225.00	585.00	Financial - Forensic Accounting
Paterson, Caroline	Prepare forensic accounting	3/4/2019	6.30	235.00	1480.50	Financial - Forensic Accounting
Turk, Matthew	Call vendor to forward phone service	3/4/2019	1.30	279.00	362.70	Legal - Business Operations
Hall, John	Review and execute vendor cancellation documents (.2), review entity financials (.2), review mail (.9), gather required tax forms (.5), review entity records (2.3)	3/4/2019	4.10	315.00	1291.50	Legal - Business Operations
Winkler, Geoffrey	Investment related document review and financial research	3/5/2019	3.50	279.00	976.50	Financial - Business Analysis
Hall, John	Prepare forensic accounting	3/5/2019	0.90	270.00	243.00	Financial - Forensic Accounting
Adams, Jacob	Forensic accounting, assisting JA and brokerage statements	3/5/2019	5.80	279.00	1618.20	Financial - Forensic Accounting
Hall, John	Prepare forensic accounting	3/5/2019	1.50	225.00	337.50	Financial - Forensic Accounting
Paterson, Caroline	Prepare forensic accounting	3/5/2019	7.90	235.00	1856.50	Financial - Forensic Accounting
Turk, Matthew	Review records received	3/5/2019	2.80	315.00	882.00	Legal - Case Administration
Winkler, Geoffrey	Prepare forensic accounting	3/6/2019	2.10	270.00	567.00	Financial - Forensic Accounting
Adams, Jacob	Forensic accounting, assisting JA and brokerage statements	3/6/2019	7.20	279.00	2008.80	Financial - Forensic Accounting
Hall, John						

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<u>Personnel</u>	<u>Item / Description</u>	<u>Date</u>	<u>Hours</u>	<u>Rate</u>	<u>Amount</u>	<u>Activity Category</u>
Paterson, Caroline	Prepare forensic accounting	3/6/2019	2.50	225.00	562.50	Financial - Forensic Accounting
Turk, Matthew	Prepare forensic accounting	3/6/2019	8.20	235.00	1927.00	Financial - Forensic Accounting
Hall, John	Call with team and separately with GW Team call with counsel (.5), review updated outside litigation budget (.2), emails with investor re tax forms and JBH re mailing (.2), review inventory of files (.2), email with JDC re investor contact (.1), research investor information (.2), review new lease buyout request and discussion with JBH (.3)	3/6/2019	1.00	279.00	279.00	Legal - Case Administration
Winkler, Geoffrey		3/6/2019	1.80	315.00	567.00	Legal - Case Administration
Adams, Jacob	Prepare forensic accounting	3/7/2019	1.10	270.00	297.00	Financial - Forensic Accounting
Turk, Matthew	Prepare forensic accounting	3/7/2019	7.30	235.00	1715.50	Financial - Forensic Accounting
Hall, John	Setting up bookkeeping terminal, and researching all 1099 data	3/7/2019	2.60	279.00	725.40	Financial - Tax Issues
Hall, John	Review all files on hand for Defendant's requested files	3/7/2019	2.50	279.00	697.50	Legal - Case Administration
Hall, John	Transfer files to office	3/7/2019	2.00	279.00	558.00	Legal - Case Administration
Winkler, Geoffrey	Review letter from investor and emails with counsel re approach (.2)	3/7/2019	0.20	315.00	63.00	Legal - Case Administration
Hall, John	Lease collateral valuation research and analysis	3/8/2019	0.70	279.00	195.30	Financial - Accounting/Auditing
Adams, Jacob	Prepare forensic accounting	3/8/2019	1.50	270.00	405.00	Financial - Forensic Accounting
Hall, John	Forensic accounting, assisting JA and brokerage statements	3/8/2019	0.50	279.00	139.50	Financial - Forensic Accounting
Turk, Matthew	Prepare forensic accounting	3/8/2019	7.30	235.00	1715.50	Financial - Forensic Accounting
Hall, John	1099 Preparation	3/8/2019	3.50	279.00	976.50	Financial - Tax Issues
Hall, John	Respond to investor's audit request	3/8/2019	0.80	279.00	223.20	Legal - Business Operations
Hall, John	Email from, research and response to Defendant re: needed documents	3/8/2019	0.50	279.00	139.50	Legal - Case Administration
Hall, John	Receipt of, intake and review of received digitized physical files from SM	3/8/2019	2.50	279.00	697.50	Legal - Case Administration
Winkler, Geoffrey	Review records received	3/8/2019	2.20	315.00	693.00	Legal - Case Administration
Adams, Jacob	Prepare forensic accounting	3/11/2019	1.80	270.00	486.00	Financial - Forensic Accounting
Hall, John	Forensic accounting, assisting JA and brokerage statements	3/11/2019	6.30	279.00	1757.70	Financial - Forensic Accounting
Turk, Matthew	Prepare forensic accounting	3/11/2019	2.20	235.00	517.00	Financial - Forensic Accounting
Hall, John	Work with vendor re accounting platform Execute sublease termination agreement (.2), emails with investors re taxes (.2), review tax filings and conversation with counsel (.4), discussion with JBH re verification (.2), review records (6.3)	3/11/2019	2.00	279.00	558.00	Legal - Business Operations
Winkler, Geoffrey		3/11/2019	7.30	315.00	2299.50	Legal - Business Operations
Adams, Jacob	Prepare forensic accounting	3/12/2019	3.80	270.00	1026.00	Financial - Forensic Accounting
Hall, John	Forensic accounting, assisting JA and brokerage statements	3/12/2019	7.10	279.00	1980.90	Financial - Forensic Accounting
Turk, Matthew	Prepare forensic accounting	3/12/2019	4.80	235.00	1128.00	Financial - Forensic Accounting
Hall, John	CPA and 2018 tax processing management	3/12/2019	0.60	279.00	167.40	Financial - Tax Issues
Hall, John	Work with vendor re accounting platform	3/12/2019	0.80	279.00	223.20	Legal - Business Operations
Winkler, Geoffrey	Discussion with counsel re tax filings, research (.4), review case documents (4.8)	3/12/2019	5.20	315.00	1638.00	Legal - Business Operations
Adams, Jacob	Prepare forensic accounting	3/13/2019	4.60	270.00	1242.00	Financial - Forensic Accounting
Hall, John	Forensic accounting, assisting JA and brokerage statements	3/13/2019	4.20	279.00	1171.80	Financial - Forensic Accounting
Paterson, Caroline	Prepare forensic accounting	3/13/2019	2.40	225.00	540.00	Financial - Forensic Accounting
Hall, John	Project meeting with counsel, GW	3/13/2019	0.60	279.00	167.40	Legal - Case Administration
Winkler, Geoffrey	Call with team (1.0), respond to emails (.2), review records (5.5)	3/13/2019	6.70	315.00	2110.50	Legal - Case Administration

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Hall, John	Research and work associated with request calculations	3/14/2019	4.20	279.00	1171.80	Financial - Accounting/Auditing
Winkler, Geoffrey	Gather financial records, review transactions, prepare calculations (2.7), call with team (.4), review corporate records (4.8)	3/14/2019	7.90	315.00	2488.50	Financial - Accounting/Auditing
Adams, Jacob	Prepare forensic accounting	3/14/2019	7.70	270.00	2079.00	Financial - Forensic Accounting
Hall, John	Forensic accounting, assisting JA and brokerage statements	3/14/2019	2.60	279.00	725.40	Financial - Forensic Accounting
Paterson, Caroline	Prepare forensic accounting	3/14/2019	0.90	225.00	202.50	Financial - Forensic Accounting
Hall, John	Meeting with GW and JA re: status	3/14/2019	0.60	279.00	167.40	Legal - Case Administration
Hall, John	Receipt and organization of pre-receivership vendor documents and subpoenaed bank statements and associated documents	3/14/2019	0.50	279.00	139.50	Legal - Case Administration
Hall, John	Research and work associated with updating calculations	3/15/2019	5.40	279.00	1506.60	Financial - Accounting/Auditing
Winkler, Geoffrey	Review accounting, bank records, documentation to prepare calculations, including emails with team, counsel, others re the same (8.4)	3/15/2019	8.40	315.00	2646.00	Financial - Accounting/Auditing
Adams, Jacob	Prepare forensic accounting	3/15/2019	0.70	270.00	189.00	Financial - Forensic Accounting
Hall, John	Forensic accounting, assisting JA and brokerage statements	3/15/2019	1.00	279.00	279.00	Financial - Forensic Accounting
Hall, John	Receipt and organization of pre-receivership vendor documents and subpoenaed bank statements and associated documents	3/15/2019	1.40	279.00	390.60	Legal - Case Administration
Hall, John	Work in preparation of and call to counsel to discuss calculations	3/18/2019	1.40	279.00	390.60	Financial - Accounting/Auditing
Winkler, Geoffrey	Call to discuss accounting (.5), review buy offer (.2), update calculations (7.7), emails with counsel (.2)	3/18/2019	8.60	315.00	2709.00	Financial - Accounting/Auditing
Gutierrez, Jr., Eduardo	Prepare forensic accounting	3/18/2019	4.00	205.00	820.00	Financial - Forensic Accounting
Hall, John	Brokerage statements accounting and requests for transaction detail	3/18/2019	3.50	279.00	976.50	Financial - Forensic Accounting
Hall, John	Forensic accounting and related database tasks	3/18/2019	0.50	279.00	139.50	Financial - Forensic Accounting
Paterson, Caroline	Prepare forensic accounting	3/18/2019	5.10	225.00	1147.50	Financial - Forensic Accounting
Hall, John	Review lessee request, research, discuss with counsel, and prepare response to lessee	3/18/2019	1.60	279.00	446.40	Legal - Business Operations
Hall, John	Discussion with TM re Valid8 supplemental documentation system	3/18/2019	0.60	279.00	167.40	Legal - Case Administration
Hall, John	Email from and response to Defendant	3/18/2019	0.30	279.00	83.70	Legal - Case Administration
Hall, John	Organize pre-receivership vendor production and link library to GW	3/18/2019	0.40	279.00	111.60	Legal - Case Administration
Hall, John	Research and calculation of investor loss	3/19/2019	2.80	279.00	781.20	Financial - Accounting/Auditing
Hall, John	Investor note review for GW	3/19/2019	1.00	279.00	279.00	Financial - Accounting/Auditing
Winkler, Geoffrey	Email and call with DM re status (.5), call with counsel (.3), emails with investor (.1), emails with JBH re lease buyout (.2), call with counsel (.4), call with DM (.3), update calculations (2.1), review documents, scan, emails with JBH (4.4)	3/19/2019	8.30	315.00	2614.50	Financial - Accounting/Auditing
Hall, John	Investment research and correspond with NA	3/19/2019	1.20	279.00	334.80	Financial - Business Analysis
Adams, Jacob	Prepare forensic accounting	3/19/2019	0.60	270.00	162.00	Financial - Forensic Accounting
Gutierrez, Jr., Eduardo	Prepare forensic accounting	3/19/2019	8.50	205.00	1742.50	Financial - Forensic Accounting
Hall, John	Brokerage statements accounting and requests for transaction detail	3/19/2019	2.90	279.00	809.10	Financial - Forensic Accounting
Paterson, Caroline	Prepare forensic accounting	3/19/2019	1.90	225.00	427.50	Financial - Forensic Accounting
Hall, John	Inventorying and cataloguing leases	3/19/2019	0.60	279.00	167.40	Legal - Case Administration
Hall, John	Analysis of investor claim and payments	3/20/2019	1.20	279.00	334.80	Financial - Accounting/Auditing
Gutierrez, Jr., Eduardo	Prepare forensic accounting	3/20/2019	4.90	205.00	1004.50	Financial - Forensic Accounting

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Hall, John	Brokerage statements accounting and requests for transaction detail	3/20/2019	4.50	279.00	1255.50	Financial - Forensic Accounting
Paterson, Caroline	Prepare forensic accounting	3/20/2019	3.80	225.00	855.00	Financial - Forensic Accounting
Hall, John	Review MBT agreement, discuss with GW and memo to counsel	3/20/2019	1.10	279.00	306.90	Legal - Business Operations
Hall, John	WC policy cancellation and premium return request	3/20/2019	0.80	279.00	223.20	Legal - Business Operations
Hall, John	Call from NA to discuss various items	3/20/2019	0.50	279.00	139.50	Legal - Case Administration
Hall, John	Email from and response to Defendant	3/20/2019	0.50	279.00	139.50	Legal - Case Administration
Hall, John	Weekly team meeting GW, NA, JD	3/20/2019	0.50	279.00	139.50	Legal - Case Administration
Winkler, Geoffrey	Call with investor (.5), call with DM (.3), emails with investor (.1), call with counsel (.3), review company records (6.3), discussion with counsel re calculations (.3)	3/20/2019	7.80	315.00	2457.00	Legal - Case Administration
Winkler, Geoffrey	Call with counsel re calculation details (.5), draft methodology and assumptions (.6), review and compare Defendant's calculations (.8), review company records (4.2)	3/21/2019	6.10	315.00	1921.50	Financial - Accounting/Auditing
Gutierrez, Jr., Eduardo	Prepare forensic accounting	3/21/2019	4.00	205.00	820.00	Financial - Forensic Accounting
Hall, John	Brokerage statements accounting and requests for transaction detail	3/21/2019	5.00	279.00	1395.00	Financial - Forensic Accounting
Hall, John	Initial analysis and findings from brokerage statement accounting	3/21/2019	4.50	279.00	1255.50	Financial - Forensic Accounting
Paterson, Caroline	Prepare forensic accounting	3/21/2019	4.30	225.00	967.50	Financial - Forensic Accounting
Turk, Matthew	Prepare forensic accounting	3/21/2019	3.10	235.00	728.50	Financial - Forensic Accounting
Hall, John	Email from and response to Defendant	3/21/2019	0.20	279.00	55.80	Legal - Case Administration
Gutierrez, Jr., Eduardo	Prepare forensic accounting	3/22/2019	2.90	205.00	594.50	Financial - Forensic Accounting
Hall, John	Brokerage statements accounting and requests for transaction detail	3/22/2019	5.60	279.00	1562.40	Financial - Forensic Accounting
Hall, John	Initial analysis and findings from brokerage statement accounting	3/22/2019	2.00	279.00	558.00	Financial - Forensic Accounting
Paterson, Caroline	Prepare forensic accounting	3/22/2019	4.90	225.00	1102.50	Financial - Forensic Accounting
Turk, Matthew	Prepare forensic accounting	3/22/2019	7.20	235.00	1692.00	Financial - Forensic Accounting
Winkler, Geoffrey	Emails with Defendant re vendor payments (.2), review records, prepare for storage (6.9)	3/22/2019	7.10	315.00	2236.50	Legal - Case Administration
Hall, John	Email from and response to Defendant	3/23/2019	0.30	279.00	83.70	Legal - Case Administration
Hall, John	Moving case files	3/24/2019	4.00	279.00	1116.00	Legal - Case Administration
Hall, John	Lease file review	3/25/2019	0.60	279.00	167.40	Financial - Accounting/Auditing
Hall, John	Lease receivables research and analysis	3/25/2019	1.50	279.00	418.50	Financial - Accounting/Auditing
Hall, John	Lease research and correspondence with Defendant	3/25/2019	2.60	279.00	725.40	Financial - Business Analysis
Gutierrez, Jr., Eduardo	Prepare forensic accounting	3/25/2019	8.20	205.00	1681.00	Financial - Forensic Accounting
Hall, John	Work with Valid8 on forensic accounting	3/25/2019	1.10	279.00	306.90	Financial - Forensic Accounting
Hall, John	Call from affected investor's representative	3/25/2019	0.40	279.00	111.60	Legal - Case Administration
Hall, John	Call to discuss production request items and misc. case items with GW	3/25/2019	0.80	279.00	223.20	Legal - Case Administration
Hall, John	Case discussion with GW	3/25/2019	0.20	279.00	55.80	Legal - Case Administration
Hall, John	Discuss production need with MBT	3/25/2019	0.50	279.00	139.50	Legal - Case Administration
Winkler, Geoffrey	Emails with counsel re: documents (.1), review emails (5.2), call with counsel (.4), call with Plaintiff and counsel (0.6), review investor call (.1), review recon and forward to JBH (.3), review documents and emails with counsel (.3), emails with JBH re schedule (.2), prepare schedules and email to counsel (.5), emails with counsel re document request (.3)	3/25/2019	8.00	315.00	2520.00	Legal - Case Administration

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Hall, John	Call with GW re: accounting and 3rd party	3/26/2019	0.70	279.00	195.30	Financial - Accounting/Auditing
Hall, John	Purchase and valuation research, memo to GW	3/26/2019	0.40	279.00	111.60	Financial - Accounting/Auditing
Hall, John	Investment research and memo to GW	3/26/2019	0.60	279.00	167.40	Financial - Accounting/Auditing
Hall, John	Lease receivables research and analysis	3/26/2019	0.30	279.00	83.70	Financial - Accounting/Auditing
Hall, John	Memo to GW re: lease accounting methodology and associated research	3/26/2019	1.50	279.00	418.50	Financial - Accounting/Auditing
Hall, John	Calculate amount invested for specific investments	3/26/2019	2.10	279.00	585.90	Financial - Accounting/Auditing
Hall, John	Work with Valid8 on forensic accounting	3/26/2019	0.60	279.00	167.40	Financial - Forensic Accounting
Paterson, Caroline	Prepare forensic accounting	3/26/2019	6.50	225.00	1462.50	Financial - Forensic Accounting
Hall, John	Review marketing agreement and marketing efforts	3/26/2019	2.50	279.00	697.50	Legal - Case Administration
Hall, John	Working through account access with MBT	3/26/2019	0.80	279.00	223.20	Legal - Case Administration
Winkler, Geoffrey	Emails with MBT and JBH re lease payment (.2), review emails (3.3),	3/26/2019	3.50	315.00	1102.50	Legal - Case Administration
Hall, John	Creating list of all loans and work with MBT to identify missing documentation	3/27/2019	1.10	279.00	306.90	Financial - Accounting/Auditing
Hall, John	Lease receivables research and analysis	3/27/2019	0.40	279.00	111.60	Financial - Accounting/Auditing
Hall, John	Calculate amount invested for specific investments	3/27/2019	1.20	279.00	334.80	Financial - Accounting/Auditing
Hall, John	Investment research and associated analysis for GW	3/27/2019	2.00	279.00	558.00	Financial - Business Analysis
Hall, John	Work with Valid8 on forensic accounting	3/27/2019	0.40	279.00	111.60	Financial - Forensic Accounting
Paterson, Caroline	Prepare forensic accounting	3/27/2019	5.10	225.00	1147.50	Financial - Forensic Accounting
Hall, John	Call with GW re: Due from Shareholder	3/27/2019	0.30	279.00	83.70	Legal - Case Administration
Hall, John	Research and respond to request from Defendant	3/27/2019	0.80	279.00	223.20	Legal - Case Administration
Winkler, Geoffrey	Compile information for counsel (1.5), review records and prepare for storage (2.6)	3/27/2019	4.10	315.00	1291.50	Legal - Case Administration
Adams, Jacob	Prepare forensic accounting	3/28/2019	0.60	270.00	162.00	Financial - Forensic Accounting
Paterson, Caroline	Prepare forensic accounting	3/28/2019	6.90	225.00	1552.50	Financial - Forensic Accounting
Hall, John	Research lease buyouts and deposits	3/28/2019	1.00	279.00	279.00	Legal - Business Operations
Hall, John	Call with GW re: file review	3/28/2019	0.20	279.00	55.80	Legal - Case Administration
Hall, John	Discuss accounting with GW	3/28/2019	0.40	279.00	111.60	Legal - Case Administration
Hall, John	Review boxes per Defendant's request, retrieve needed files	3/28/2019	5.50	279.00	1534.50	Legal - Case Administration
	Records to storage, review records, pull records from storage (2.4), review records from investor, research, work with JBH, emails with counsel (0.8), create investor calculations, review records, emails with counsel (1.6), review new records (2.1)	3/28/2019	6.90	315.00	2173.50	Legal - Case Administration
Winkler, Geoffrey						
Hall, John	Call to discuss calculations and supporting documentation	3/29/2019	1.20	279.00	334.80	Financial - Accounting/Auditing
Hall, John	Call to discuss calculations and supporting documentation	3/29/2019	0.20	279.00	55.80	Financial - Accounting/Auditing
Hall, John	Lease receivables research and analysis	3/29/2019	1.00	279.00	279.00	Financial - Accounting/Auditing
Hall, John	Review correspondence from accountant, associated coordination of filing with GW	3/29/2019	1.00	279.00	279.00	Financial - Accounting/Auditing
	Call with counsel to discuss accounting (.7), review source documents and update information (2.2), review information from investor's counsel, research sources, prepare response (2.4), review documents and update calculations (2.6)	3/29/2019	7.90	315.00	2488.50	Financial - Accounting/Auditing
Winkler, Geoffrey						
Adams, Jacob	Prepare forensic accounting	3/29/2019	1.10	270.00	297.00	Financial - Forensic Accounting
Hall, John	Work with Valid8 on forensic accounting	3/29/2019	0.20	279.00	55.80	Financial - Forensic Accounting
Hall, John	Discussion of investor claims	3/29/2019	0.50	279.00	139.50	Legal - Case Administration

SEC v. Essex Capital Corporation
Summary of Fees of Receiver and Retained Personnel
December 21, 2018 - March 31, 2019
(Sorted in Chronological Order by Activity Category)

Attachment 1

<u>Personnel</u>	<u>Item / Description</u>	<u>Date</u>	<u>Hours</u>	<u>Rate</u>	<u>Amount</u>	<u>Activity Category</u>
Hall, John	MBT bank loan research	3/29/2019	0.50	279.00	139.50	Legal - Case Administration
Hall, John	Scan and email statements to JA, memo of findings to JA, progress discussion	3/29/2019	1.80	279.00	502.20	Legal - Case Administration
		Totals	<u>1,305.2</u>		<u>\$ 363,747.70</u>	

SEC v. Essex Capital Corporation
 Summary of Fees of Receiver and Retained Personnel
 December 21, 2018 - March 31, 2019
 (Sorted in Chronological Order by Activity Category)

Attachment 1

Personnel	Item / Description	Date	Hours	Rate	Amount	Activity Category
Summary by Activity Category and Personnel						
Financial - Accounting/Auditing		Personnel	Firm	Hours	Rate	Amount
Financial - Accounting/Auditing	Hall, John	A&M	41.6	279.00	\$ 11,606.40	
Financial - Accounting/Auditing	Winkler, Geoffrey	A&M	60.4	315.00	\$ 19,026.00	
			<u>102.0</u>		<u>\$ 30,632.40</u>	
Financial - Business Analysis		Personnel	Firm	Hours	Rate	Amount
Financial - Business Analysis	Hall, John	A&M	17.8	279.00	\$ 4,966.20	
			<u>17.8</u>		<u>\$ 4,966.20</u>	
Financial - Data Analysis		Personnel	Firm	Hours	Rate	Amount
Financial - Data Analysis	Johnson, Robert	A&M	4.1	595.00	\$ 2,439.50	
Financial - Data Analysis	Kwan, Peter	A&M	0.8	595.00	\$ 476.00	
			<u>4.9</u>		<u>\$ 2,915.50</u>	
Financial - Forensic Accounting		Personnel	Firm	Hours	Rate	Amount
Financial - Forensic Accounting	Adams, Jacob	A&M	184.3	270.00	\$ 49,761.00	
Financial - Forensic Accounting	Frost, Edward	A&M	0.5	575.00	\$ 287.50	
Financial - Forensic Accounting	Gutierrez, Jr., Eduardo	A&M	41.3	205.00	\$ 8,466.50	
Financial - Forensic Accounting	Hall, John	A&M	205.9	279.00	\$ 57,446.10	
Financial - Forensic Accounting	Hood, Chase	A&M	0.6	235.00	\$ 141.00	
Financial - Forensic Accounting	Paterson, Caroline	A&M	70.7	225.00	\$ 15,907.50	
Financial - Forensic Accounting	Rodarte, Pamela	A&M	33.8	125.00	\$ 4,225.00	
Financial - Forensic Accounting	Turk, Matthew	A&M	68.3	235.00	\$ 16,050.50	
Financial - Forensic Accounting	Winkler, Geoffrey	A&M	6.8	315.00	\$ 2,142.00	
			<u>612.2</u>		<u>\$ 154,427.10</u>	
Financial - Tax Issues		Personnel	Firm	Hours	Rate	Amount
Financial - Tax Issues	Hall, John	A&M	9.6	279.00	\$ 2,678.40	
			<u>9.6</u>		<u>\$ 2,678.40</u>	
Legal - Business Operations		Personnel	Firm	Hours	Rate	Amount
Legal - Business Operations	Hall, John	A&M	37.8	279.00	\$ 10,546.20	
Legal - Business Operations	Winkler, Geoffrey	A&M	79.7	315.00	\$ 25,105.50	
			<u>117.5</u>		<u>\$ 35,651.70</u>	
Legal - Case Administration		Personnel	Firm	Hours	Rate	Amount
Legal - Case Administration	Hall, John	A&M	180.6	279.00	\$ 50,387.40	
Legal - Case Administration	Winkler, Geoffrey	A&M	260.6	315.00	\$ 82,089.00	
			<u>441.2</u>		<u>\$ 132,476.40</u>	
Travel		Personnel	Firm	Hours	Rate	Amount
Travel	Hall, John	A&M	-	279.00	\$ -	
Travel	Winkler, Geoffrey	A&M	-	315.00	\$ -	
			<u>-</u>		<u>\$ -</u>	

SEC v. Essex Capital Corporation
 Summary of Fees of Receiver and Retained Personnel
 December 21, 2018 - March 31, 2019
 (Sorted in Chronological Order by Activity Category)

Attachment 1

Personnel	Item / Description	Date	Hours	Rate	Amount	Activity Category
Overall Summary						
Totals	Personnel	Firm	Hours	Rate	Amount	
	Adams, Jacob	A&M	184.3	270.00	\$ 49,761.00	
	Frost, Edward	A&M	0.5	575.00	\$ 287.50	
	Gutierrez, Jr., Eduardo	A&M	41.3	205.00	\$ 8,466.50	
	Hall, John	A&M	493.3	279.00	\$ 137,630.70	
	Hood, Chase	A&M	0.6	235.00	\$ 141.00	
	Johnson, Robert	A&M	4.1	595.00	\$ 2,439.50	
	Kwan, Peter	A&M	0.8	595.00	\$ 476.00	
	Paterson, Caroline	A&M	70.7	225.00	\$ 15,907.50	
	Rodarte, Pamela	A&M	33.8	125.00	\$ 4,225.00	
	Turk, Matthew	A&M	68.3	235.00	\$ 16,050.50	
	Winkler, Geoffrey	A&M	407.5	315.00	\$ 128,362.50	
			<u>1,305.2</u>		<u>\$ 363,747.70</u>	

SEC v. Essex Capital Corporation
Summary of Expenses of Receiver and Retained Personnel
December 21, 2018 - March 31, 2019

Attachment 2

Incurring By	Payee	Item / Description	Date Incurred	Amount	Category
Hall, John	Alaska Airlines	Airfare: Trip to SB	12/21/2018	784.00	Airfare
Winkler, Geoffrey	Alaska Airlines	Airfare: Trip to SB	12/21/2018	784.00	Airfare
Hall, John	Courtyard	Parking: Hotel	12/26/2018	10.00	Parking
Hall, John	Alaska Airlines	Airfare: Trip to SB	12/27/2018	30.00	Airfare
Winkler, Geoffrey	Courtyard	Hotel in SB	12/27/2018	553.82	Hotel
Hall, John	Courtyard	Hotel in SB	12/27/2018	553.82	Hotel
Hall, John	Courtyard	Parking: Hotel	12/27/2018	10.00	Parking
Winkler, Geoffrey	ESP Locksmith	Miscellaneous: Re-key office	12/27/2018	135.00	Miscellaneous
Winkler, Geoffrey	FedEx	Shipping supplies	12/27/2018	20.65	Courier/Shipping/Freight
Winkler, Geoffrey	FedEx	Printing/Photocopying/Stationery: Printing order	12/27/2018	15.12	Printing/Photocopying/Stationery
Winkler, Geoffrey	Hollister Brewing	Individual Meals (GW & JBH)	12/27/2018	52.00	Individual Meals
Hall, John	Home Depot	Office Supplies: Essex	12/27/2018	43.01	Office Supplies
Winkler, Geoffrey	Subway	Individual Meals (GW & JBH)	12/27/2018	20.89	Individual Meals
Hall, John	Costa Terraza	Individual Meals (GW & JBH)	12/28/2018	66.00	Individual Meals
Winkler, Geoffrey	Geoff Winkler	Personal Car Mileage: Essex	12/28/2018	61.04	Personal Car Mileage
Winkler, Geoffrey	In-N-Out	Individual Meals (GW & JBH)	12/28/2018	14.49	Individual Meals
Hall, John	National Car Rental	Car Rental: Essex	12/28/2018	118.14	Car Rental
Hall, John	Pepe's	Individual Meals (GW & JBH)	12/28/2018	44.00	Individual Meals
Winkler, Geoffrey	Port of Portland	Parking: Airport	12/28/2018	36.00	Parking
Hall, John	Staples	Office Supplies: Essex	12/28/2018	162.39	Office Supplies
Hall, John	Village Fuel	Fuel: Essex	12/28/2018	21.34	Fuel
Winkler, Geoffrey	FedEx	FedEx- December. 2018	12/31/2018	26.20	Courier/Shipping/Freight
Winkler, Geoffrey	Godaddy.com	Miscellaneous: Website	1/2/2019	29.88	Miscellaneous
Winkler, Geoffrey	USPS	Miscellaneous: Mailbox	1/2/2019	35.00	Miscellaneous
Hall, John	John Hall	Personal Car Mileage: Essex	1/3/2019	53.96	Personal Car Mileage
Winkler, Geoffrey	La Hacienda	Individual Meals (GW & JBH)	1/3/2019	26.00	Individual Meals
Winkler, Geoffrey	NW Self Storage	Miscellaneous: Storage unit	1/3/2019	70.05	Miscellaneous
Winkler, Geoffrey	PACER	Internet/Online Fees: PACER	1/4/2019	49.95	Miscellaneous
Winkler, Geoffrey	PACER	Internet/Online Fees: PACER	1/7/2019	60.70	Miscellaneous
Hall, John	Alaska Airlines	Airfare: Trip to SB	1/8/2019	240.60	Airfare
Winkler, Geoffrey	Alaska Airlines	Airfare: Trip to SB	1/8/2019	240.60	Airfare
Winkler, Geoffrey	Alaska Airlines	Airfare: Trip to SB	1/8/2019	573.30	Airfare
Winkler, Geoffrey	Alaska Airlines	Airfare: Trip to SFO to image drives	1/9/2019	602.61	Airfare
Winkler, Geoffrey	Norvac	Miscellaneous: Anti-static bags for hard drive transport	1/9/2019	4.20	Miscellaneous
Winkler, Geoffrey	In-N-Out	Individual Meals (GW & JBH)	1/10/2019	14.31	Individual Meals
Winkler, Geoffrey	Lyft	Taxi: SFO to office for forensic imaging	1/10/2019	43.50	Taxi
Winkler, Geoffrey	Lyft	Taxi: Office to SFO	1/10/2019	38.40	Taxi
Hall, John	Office Depot	Office Supplies: Essex investor meeting	1/10/2019	29.98	Office Supplies
Winkler, Geoffrey	Port of Portland	Parking: Airport	1/10/2019	24.00	Parking

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SEC v. Essex Capital Corporation
Summary of Expenses of Receiver and Retained Personnel
December 21, 2018 - March 31, 2019

Attachment 2

Incurred By	Payee	Item / Description	Date Incurred	Amount	Category
Johnson, Robert	Amazon	Office Supplies: Hard drives for data preservation	1/14/2019	216.98	Office Supplies
Winkler, Geoffrey	Courtyard	Hotel in LA	1/15/2019	370.04	Hotel
Winkler, Geoffrey	Courtyard	Parking: Hotel	1/15/2019	52.80	Parking
Winkler, Geoffrey	LAZ Parking	Parking: Los Angeles for meeting with MBT	1/15/2019	30.00	Parking
Winkler, Geoffrey	Original Pantry Café	Individual Meals (GW & JBH)	1/15/2019	26.84	Individual Meals
Winkler, Geoffrey	Courtyard	Hotel in SB	1/16/2019	204.46	Hotel
Winkler, Geoffrey	Courtyard	Parking: Hotel	1/16/2019	10.00	Parking
Winkler, Geoffrey	In-N-Out	Individual Meals	1/16/2019	6.90	Individual Meals
Winkler, Geoffrey	L&L Hawaiian BBQ	Individual Meals	1/16/2019	13.69	Individual Meals
Winkler, Geoffrey	Avis	Car Rental: Essex	1/17/2019	153.12	Car Rental
Winkler, Geoffrey	Best Buy	Miscellaneous: Digital storage devices	1/17/2019	107.74	Miscellaneous
Winkler, Geoffrey	Geoff Winkler	Personal Car Mileage: Essex	1/17/2019	64.96	Personal Car Mileage
Winkler, Geoffrey	Pepe's	Individual Meals	1/17/2019	20.00	Individual Meals
Winkler, Geoffrey	Port of Portland	Parking: Airport	1/17/2019	36.00	Parking
Winkler, Geoffrey	University Chevron	Fuel: Essex	1/17/2019	21.00	Fuel
Hall, John	FedEx	Printing/Photocopying/Stationery: Essex investor meeting	1/21/2019	190.74	Printing/Photocopying/Stationery
Hall, John	Courtyard	Hotel in SB	1/22/2019	215.78	Hotel
Winkler, Geoffrey	Courtyard	Parking: Hotel	1/22/2019	10.00	Parking
Winkler, Geoffrey	Kahuna Grill	Individual Meals (GW & JBH)	1/22/2019	29.59	Individual Meals
Winkler, Geoffrey	The Mill Bakery	Individual Meals	1/22/2019	5.75	Individual Meals
Winkler, Geoffrey	Arco	Fuel: Essex	1/23/2019	53.25	Fuel
Winkler, Geoffrey	BWW	Individual Meals (GW & JBH)	1/23/2019	73.26	Individual Meals
Winkler, Geoffrey	Courtyard	Hotel in SB	1/23/2019	468.00	Hotel
Winkler, Geoffrey	FedEx	Printing/Photocopying/Stationery: Essex	1/23/2019	2.10	Printing/Photocopying/Stationery
Winkler, Geoffrey	Home Depot	Miscellaneous: Essex packing supplies	1/23/2019	19.36	Miscellaneous
Winkler, Geoffrey	In-N-Out	Individual Meals (GW & JBH)	1/23/2019	13.79	Individual Meals
Winkler, Geoffrey	Port of Portland	Parking: Airport	1/23/2019	44.00	Parking
Winkler, Geoffrey	Staples	Miscellaneous: Essex packing supplies	1/23/2019	10.76	Miscellaneous
Winkler, Geoffrey	Uhaul	Car Rental: Essex	1/23/2019	47.45	Car Rental
Winkler, Geoffrey	Avis	Car Rental: Essex	1/24/2019	115.13	Car Rental
Winkler, Geoffrey	Geoff Winkler	Personal Car Mileage: Essex	1/24/2019	64.96	Personal Car Mileage
Winkler, Geoffrey	Port of Portland	Parking: Airport	1/24/2019	36.00	Parking
Hall, John	John Hall	Personal Car Mileage: Essex	1/29/2019	57.42	Personal Car Mileage
Winkler, Geoffrey	FedEx	FedEx- January. 2019	1/31/2019	594.40	Courier/Shipping/Freight
Winkler, Geoffrey	Godaddy.com	Miscellaneous: Website hosting	1/31/2019	71.88	Miscellaneous
Winkler, Geoffrey	Gogo Internet	Internet/Online Fees: Internet	2/4/2019	49.95	Internet/Online Fees
Winkler, Geoffrey	Amazon	Miscellaneous: Adaptor to review hard drives found onsite	2/6/2019	51.58	Miscellaneous
Winkler, Geoffrey	FedEx	Printing/Photocopying/Stationery: Copies	2/10/2019	71.27	Printing/Photocopying/Stationery
Winkler, Geoffrey	FedEx	FedEx- February. 2019	2/28/2019	925.87	Courier/Shipping/Freight

Exhibit A - Page 32

SEC v. Essex Capital Corporation
Summary of Expenses of Receiver and Retained Personnel
December 21, 2018 - March 31, 2019

Attachment 2

Incurring By	Payee	Item / Description	Date Incurred	Amount	Category
Frost, Edward	IRB	Research: Database Charges	3/1/2019	132.00	Miscellaneous
Winkler, Geoffrey	Office Max	Miscellaneous: 1099 forms	3/4/2019	49.98	Miscellaneous
Winkler, Geoffrey	USPS	Shipping via USPS	3/4/2019	7.35	Courier/Shipping/Freight
Total				<u>\$ 10,445.10</u>	

Preliminary Billing Form

Billing Atty: 001842 - Joshua Del Castillo

Matter #: 378224-00001

Matter Name: General and Administrative

Date of Last Billing:

Client Name: Winkler, Geoff/Receiver for Essex Capital Corporation

Proforma Number 1412436

Client/Matter Joint Group # 378224-1

Disbursements for Matter 378224-00001 (General and Administrative)

Trans Date	Index	Type	Quantity	Amt	Circle	Action
01/14/19	2492992	Duplication	972.00	184.68	WO	HD TR_____
01/15/19	2501557	Parking	1.00	30.00	WO	HD TR_____
01/15/19	2513071	Parking	1.00	30.00	WO	HD TR_____
01/16/19	2501558	Parking	2.00	60.00	WO	HD TR_____
01/16/19	2513072	Parking	2.00	60.00	WO	HD TR_____
01/18/19	2497415	Messenger – Federal Express Invoice No: 644150975 1842 Ship To: Casey B Howard, Esq	1.00	20.40	WO	HD TR_____
01/25/19	2495620	Reprographics - Color	48.00	12.00	WO	HD TR_____

Proforma Summary

Total Disbursements

397.08

Attorney Billing Instructions

() BILL ALL () Hold
 () BILL FEES ONLY () Write Off
 () BILL COST ONLY () Transfer All

Billing Instructions

expires 6/30/2019: 10% off standard rates (automatic)

Account Summary- As Of 03/31/2019

	Fiscal YTD			Calendar YTD			LTD		
	Total	Fees	Disbursement	Total	Fees	Disbursement	Total	Fees	Disbursement
Worked	888.48	491.40	397.08	888.48	491.40	397.08	888.48	491.40	397.08
Unbilled Adj	(491.40)	(491.40)	0.00	(491.40)	(491.40)	0.00	(491.40)	(491.40)	0.00
Billed	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00
Collected	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00
AR Write Off	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00
	Total	Fees	Cost						
WIP Balance	397.08	0.00	397.08						
AR Balance	0.00	0.00	0.00						
Unalloc Payment	0.00								
Client Trust Balance	0.00								

Billing Address

Winkler, Geoff/Receiver for Essex Capital Corporation
 Alvarez & Marsal LLC
 100 Pine Street, Suite 900
 San Francisco, CA 94111-5222
 ATTN: Geoff Winkler

Preliminary Billing Form

Billing Atty: 001842 - Joshua Del Castillo

Matter #: 378224-00002

Matter Name: General Receivership

Date of Last Billing:

Client Name: Winkler, Geoff/Receiver for Essex Capital Corporation

Proforma Number 1412437

Client/Matter Joint Group # 378224-1

Fees for Matter 378224-00002 (General Receivership)

Trans Date	Index	Description of Service Rendered	Timekeeper	Hours	Fees	Sum	Circle	Action
01/02/19	7713331	Review relevant pleadings and teleconference with Receiver re initial receivership administration matters (3.1); prepare outline for initial motion for order in aid of receivership (0.5); contact counsel for other parties (0.5); attention to initial estate administration matters (0.6).	Del Castillo, Joshua	4.7	2,643.75	3,534.75	WO	HD TR_____
01/03/19	7750854	Review/revise draft of the motion in aid of receivership, advice to counsel and Receiver (1.2).	Zaro, David	1.2	891.00	4,425.75	WO	HD TR_____
01/03/19	7713328	Confer with counsel re receivership website issues and prepare notes re same (0.5); complete initial draft of motion for order in aid of receivership and confer with counsel re same (1.0); correspondence with Receiver and counsel re case administration matters (0.5).	Del Castillo, Joshua	2.0	1,125.00	5,550.75	WO	HD TR_____
01/04/19	7713724	Complete initial revisions to draft motion for order in aid and provide to Receiver for review and comment (1.1); review Receiver's comments and finalize draft in anticipation of	Del Castillo, Joshua	1.6	900.00	6,450.75	WO	HD TR_____

Trans Date	Index	Description of Service Rendered	Timekeeper	Hours	Fees	Sum	Circle	Action
		conferring with litigants prior to filing (0.5).						
01/04/19	7741161	Review Monitor's report and provide overview to J. del Castillo (1.0).	Aspis, Norman	1.0	351.00	6,801.75	WO	HD TR_____
01/07/19	7715351	E-mails and teleconferences with Receiver, atty B. Miller, atty J. deNeve, atty G. Leung, and atty C. Howard re case administration matters (2.7); attention to issues re motion for order in aid (0.6).	Del Castillo, Joshua	3.3	1,856.25	8,658.00	WO	HD TR_____
01/07/19	7741127	Analyze and confer re letter from Akerman to G. Winkler (0.5).	Aspis, Norman	0.5	175.50	8,833.50	WO	HD TR_____
01/07/19	7741143	Teleconference with G. Winkler, J. del Castillo, and J. Hall.	Aspis, Norman	0.4	140.40	8,973.90	WO	HD TR_____
01/08/19	7716433	Attention to registration of SEC complaint and confer with counsel re same (0.4).	Del Castillo, Joshua	0.4	225.00	9,198.90	WO	HD TR_____
01/08/19	7716443	Meet and confer with counsel re motion for order in aid (0.5); finalize materials and prepare for filing (0.4).	Del Castillo, Joshua	0.9	506.25	9,705.15	WO	HD TR_____
01/08/19	7740750	Determine appropriate jurisdictions to file 11 U.S.C. section 754 miscellaneous filings, and file order regarding preliminary injunction and appointment of a permanent receiver accordingly (2.5).	Aspis, Norman	2.5	877.50	10,582.65	WO	HD TR_____
01/09/19	7718772	Evaluate the issues related to investor notices and due process as to asset recovery/jurisdiction, follow-up with counsel to advise as to the order in aid of receivership, Receiver notices and website (.6).	Zaro, David	0.6	445.50	11,028.15	WO	HD TR_____

Trans Date	Index	Description of Service Rendered	Timekeeper	Hours	Fees	Sum	Circle	Action
01/09/19	7717117	Confer with counsel re pending receivership administration tasks (0.7).	Del Castillo, Joshua	0.7	393.75	11,421.90	WO	HD TR _____
01/11/19	7719597	Review documents re and e-mails and confer re case administration matters (2.3); prepare for and teleconference with Receiver re administrative requests from Defendant's counsel (0.5).	Del Castillo, Joshua	2.8	1,575.00	12,996.90	WO	HD TR _____
01/11/19	7720050	Confer with G. Winkler, J. Hall, and J. del Castillo regarding receivership updates.	Aspis, Norman	0.5	175.50	13,172.40	WO	HD TR _____
01/11/19	7720057	Prepare global tracking chart for receivership.	Aspis, Norman	0.9	315.90	13,488.30	WO	HD TR _____
01/14/19	7721400	Confer with counsel and attention to receivership administration matters (0.8).	Del Castillo, Joshua	0.8	450.00	13,938.30	WO	HD TR _____
01/14/19	7723362	Produce and populate global tracking chart for subpoena, miscellaneous court filings, county recordations, and pending litigation (pre-appointment and post-appointment) (2.1).	Aspis, Norman	2.1	737.10	14,675.40	WO	HD TR _____
01/15/19	7723123	Prepare for and attend meeting with Receiver to discuss case administration matters (4.0); correspondence with atty J. deNeve re request for materials (0.1); correspondence with atty I. Kallick re meeting (0.1).	Del Castillo, Joshua	4.2	2,362.50	17,037.90	WO	HD TR _____
01/16/19	7724081	Prepare for and attend meeting with MB&T and counsel, and confer with Receiver re same (2.1); review documents and attention to case	Del Castillo, Joshua	3.2	1,800.00	18,837.90	WO	HD TR _____

Trans Date	Index	Description of Service Rendered	Timekeeper	Hours	Fees	Sum	Circle	Action
		administration matters (1.1).						
01/17/19	7725357	Review and respond to correspondence and inquiries re case administration matters and confer with counsel re same (0.8).	Del Castillo, Joshua	0.8	450.00	19,287.90	WO	HD TR_____
01/18/19	7726249	Attention to case administration matters and confer with counsel (0.4).	Del Castillo, Joshua	0.4	225.00	19,512.90	WO	HD TR_____
01/22/19	7728028	Confer with counsel re case administration matters (0.8).	Del Castillo, Joshua	0.8	450.00	19,962.90	WO	HD TR_____
01/22/19	7738804	Prepare for and participate in meeting regarding Amagansett and drafting notices of pending receivership.	Aspis, Norman	0.5	175.50	20,138.40	WO	HD TR_____
01/22/19	7738822	Draft and transmit turnover letters to pre-receivership service provider.	Aspis, Norman	0.4	140.40	20,278.80	WO	HD TR_____
01/24/19	7730842	Attention to case administration matters and review and respond to e-mails and phone calls re administrative requests (1.0).	Del Castillo, Joshua	1.0	562.50	20,841.30	WO	HD TR_____
01/24/19	7731121	Begin preparing Notices of Pending Receivership	Engstrom, Alyssa	0.4	140.40	20,981.70	WO	HD TR_____
01/28/19	7732248	Confer with counsel re case administration issues (0.5).	Del Castillo, Joshua	0.5	281.25	21,262.95	WO	HD TR_____
01/28/19	7734315	Analysis of authorities re: definition and interpretation of "affiliate" in LLC context (1.0); legal analysis re: definition and interpretation of "subsidiary" in LLC context (0.4); conduct research re: whether stay affects minority member of an LLC's need to participate in capital call (1.4)	Engstrom, Alyssa	2.8	982.80	22,245.75	WO	HD TR_____
01/28/19	7732505	Update global tracking sheet and	Aspis, Norman	2.0	702.00	22,947.75	WO	HD TR_____

Trans Date	Index	Description of Service Rendered	Timekeeper	Hours	Fees	Sum	Circle	Action
		correspond with pre-receivership service providers to Essex Capital Corporation (2.0).						
01/28/19	7738593	Correspond with pre-receivership service providers to Essex Capital Corp.	Aspis, Norman	0.7	245.70	23,193.45	WO	HD TR_____
01/29/19	7736178	Continue drafting Notice of Pendency of Receivership and confer with J.del Castillo re same	Engstrom, Alyssa	0.5	175.50	23,368.95	WO	HD TR_____
01/31/19	7737661	Prepare notice of non-receipt of oppositions to Motion for Order in Aid and prepare for filing (0.7).	Del Castillo, Joshua	0.7	393.75	23,762.70	WO	HD TR_____
02/04/19	7741838	Review Order in Aid of Receivership and confer with Receiver re same (0.5).	Del Castillo, Joshua	0.5	281.25	24,043.95	WO	HD TR_____
02/05/19	7744479	Teleconferences and e-mails with Receiver's office and counsel re case administration matters and prepare correspondence re same (1.3).	Del Castillo, Joshua	1.3	731.25	24,775.20	WO	HD TR_____
02/05/19	7747407	Strategy re: recordation of notice of pendency of receivership	Engstrom, Alyssa	0.2	70.20	24,845.40	WO	HD TR_____
02/06/19	7745246	Confer with SEC and Iannelli counsel, and Receiver, re anticipated April 2019 mediation (0.5).	Del Castillo, Joshua	0.5	281.25	25,126.65	WO	HD TR_____
02/08/19	7747583	Attention to case administration (0.8).	Del Castillo, Joshua	0.8	450.00	25,576.65	WO	HD TR_____
02/08/19	7767843	Draft notice of pending receivership for Union Bank matter in Santa Barbara (.3); conduct research regarding joint defense privilege issues with OMM and draft email regarding the same (0.7).	Aspis, Norman	1.0	351.00	25,927.65	WO	HD TR_____

Trans Date	Index	Description of Service Rendered	Timekeeper	Hours	Fees	Sum	Circle	Action
02/14/19	7753755	Review and respond to correspondence from J. de Neve and attention to case administration issues (0.4).	Del Castillo, Joshua	0.4	225.00	26,152.65	WO	HD TR _____
02/14/19	7766505	Review correspondence regarding an employee at Essex.	Aspis, Norman	0.2	70.20	26,222.85	WO	HD TR _____
02/20/19	7756551	Review notes and documents and e-mail with counsel and Receiver re pending estate administration matters (1.2); prepare for and attend receivership admin call (1.0).	Del Castillo, Joshua	2.2	1,237.50	27,460.35	WO	HD TR _____
02/20/19	7765384	Prepare for and participate in teleconference with G. Winkler, J. Hall, and J. del Castillo (.7); correspond with J. Hall regarding an inquiry from Daniel Investment Associates, LLC (.2).	Aspis, Norman	0.9	315.90	27,776.25	WO	HD TR _____
02/25/19	7763950	Review correspondence regarding Iannelli's personal items.	Aspis, Norman	0.2	70.20	27,846.45	WO	HD TR _____
02/27/19	7763120	Prepare for and attend case admin call with Receiver (0.7); correspondence to J. deNeve re Iannelli administrative requests (0.1).	Del Castillo, Joshua	0.8	450.00	28,296.45	WO	HD TR _____
03/01/19	7768165	E-mails and teleconferences re case administration matters (0.9).	Del Castillo, Joshua	0.9	506.25	28,802.70	WO	HD TR _____
03/01/19	7794261	Review T2 BioSystems issue (.7); transmit pre-receivership service provider materials to J. Hall (.3); teleconference with Kutak Rock (.3).	Aspis, Norman	1.3	456.30	29,259.00	WO	HD TR _____
03/04/19	7769214	Review and respond to correspondence re case administration status (0.5).	Del Castillo, Joshua	0.5	281.25	29,540.25	WO	HD TR _____

Trans Date	Index	Description of Service Rendered	Timekeeper	Hours	Fees	Sum	Circle	Action
03/04/19	7796048	Organize and transmit pre-receivership documents to J. Hall (.4); communicate with pre-receivership service providers (.4).	Aspis, Norman	0.8	280.80	29,821.05	WO	HD TR_____
03/06/19	7796621	Teleconference with J. Hall and G. Winkler (.3).	Aspis, Norman	0.3	105.30	29,926.35	WO	HD TR_____
03/09/19	7775987	Attention to and prepare inquiries re case administration and pending deadlines (1.0).	Del Castillo, Joshua	1.0	562.50	30,488.85	WO	HD TR_____
03/12/19	7776851	E-mails and confer with counsel and Receiver re pending administrative and tax issues (0.5).	Del Castillo, Joshua	0.5	281.25	30,770.10	WO	HD TR_____
03/13/19	7793979	Participate in Essex weekly call (0.5); review and transmit pre-receivership documents to J. Hall (.3).	Aspis, Norman	0.8	280.80	31,050.90	WO	HD TR_____
03/18/19	7782370	Prepare for and teleconference with Receiver re case administration and upcoming matters (1.3).	Del Castillo, Joshua	1.3	731.25	31,782.15	WO	HD TR_____
03/20/19	7784556	Prepare for and teleconference with Monitor re case administration matters (1.1); e-mails re same (0.3).	Del Castillo, Joshua	1.4	787.50	32,569.65	WO	HD TR_____
03/28/19	7793797	Case administration conference with counsel (.5); prepare for and participate in teleconference with Receiver regarding April 4 mediation between the SEC and Mr. Iannelli (.5).	Aspis, Norman	1.0	351.00	32,920.65	WO	HD TR_____

Disbursements for Matter 378224-00002 (General Receivership)

Trans Date	Index	Type	Quantity	Amt	Circle	Action
01/08/19	2492010	Filing Fees -- Clerk U.S. District Court, District of Maryland, 754 Filing^10819	1.00	47.00	WO	HD TR_____
01/08/19	2492012	Filing Fees -- Clerk U.S. District Court, Southern District of New York, 754 Filing^10819	1.00	47.00	WO	HD TR_____
01/08/19	2492016	Filing Fees -- Clerk U.S. District Court, District of Utah, 754 Filing^10819	1.00	47.00	WO	HD TR_____
01/08/19	2492017	Filing Fees -- Clerk U.S. District Court, Southern District of Florida, 754 Filing^10819	1.00	47.00	WO	HD TR_____
01/08/19	2492018	Filing Fees -- Clerk U.S. District Court, Western District of Michigan, 754 Filing^10819	1.00	47.00	WO	HD TR_____
01/08/19	2492019	Filing Fees -- Clerk U.S. District Court, District of Massachusetts, 754 Filing^10819	1.00	47.00	WO	HD TR_____
01/08/19	2492020	Filing Fees -- Clerk U.S. District Court, Southern District of California, 754 Filing^10819	1.00	47.00	WO	HD TR_____
01/08/19	2492021	Filing Fees -- Clerk U.S. District Court, Eastern District of New York, 754 Filing^10819	1.00	47.00	WO	HD TR_____
01/08/19	2492027	Filing Fees -- Clerk U.S. District Court, District of New Jersey, 754 Filing^10819	1.00	47.00	WO	HD TR_____
01/08/19	2492028	Filing Fees -- Clerk U.S. District Court, Northern District of California, 754 Filing^10819	1.00	47.00	WO	HD TR_____
01/08/19	2492032	Filing Fees -- Clerk U.S. District Court, Northern District of Texas, 754 Filing^10819	1.00	47.00	WO	HD TR_____
01/08/19	2492033	Filing Fees -- Clerk U.S. District Court, Eastern District of Pennsylvania, 754 Filing^10819	1.00	47.00	WO	HD TR_____
01/08/19	2492034	Filing Fees -- Clerk U.S. District Court, Western District of Pennsylvania, 754 Filing^10819	1.00	47.00	WO	HD TR_____
01/08/19	2492993	Duplication	504.00	95.76	WO	HD TR_____

Trans Date	Index	Type	Quantity	Amt	Circle	Action
01/08/19	2497888	Text Editing ^TOC/TOA Generation USER DEFINED 1: 001842	0.50	15.00	WO	HD TR_____
01/09/19	2493687	Messenger -- Federal Express Invoice No: 643414110 2369 Ship To: Clerk of the Court	1.00	18.07	WO	HD TR_____
01/09/19	2493688	Messenger -- Federal Express Invoice No: 643414110 2369 Ship To: Clerk of the Court	1.00	18.07	WO	HD TR_____
01/09/19	2493689	Messenger -- Federal Express Invoice No: 643414110 2369 Ship To: Clerk of the Court	1.00	15.77	WO	HD TR_____
01/09/19	2493690	Messenger -- Federal Express Invoice No: 643414110 2369 Ship To: Clerk of the Court	1.00	21.71	WO	HD TR_____
01/09/19	2493691	Messenger -- Federal Express Invoice No: 643414110 2369 Ship To: Clerk of the Court	1.00	20.05	WO	HD TR_____
01/09/19	2493692	Messenger -- Federal Express Invoice No: 643414110 2369 Ship To: Clerk of the Court	1.00	18.07	WO	HD TR_____
01/09/19	2493693	Messenger -- Federal Express Invoice No: 643414110 2369 Ship To: Clerk of the Court	1.00	20.05	WO	HD TR_____
01/09/19	2493694	Messenger -- Federal Express Invoice No: 643414110 2369 Ship To: Clerk of the Court	1.00	14.27	WO	HD TR_____
01/09/19	2493695	Messenger -- Federal Express Invoice No: 643414110 2369 Ship To: Clerk of the Court	1.00	13.33	WO	HD TR_____
01/10/19	2493683	Messenger -- Federal Express Invoice No: 643414110 2369 Ship To: Clerk of the Court	1.00	20.05	WO	HD TR_____
01/10/19	2493684	Messenger -- Federal Express Invoice No: 643414110 2369 Ship To: Clerk of the Court	1.00	20.05	WO	HD TR_____
01/10/19	2493685	Messenger -- Federal Express Invoice No: 643414110 2369 Ship To: Clerk of the Court	1.00	20.05	WO	HD TR_____
01/10/19	2493686	Messenger -- Federal Express Invoice No: 643414110 2369 Ship To: Clerk of the Court	1.00	20.05	WO	HD TR_____

Trans Date	Index	Type	Quantity	Amt	Circle	Action
01/10/19	2497310	Messenger -- Federal Express - - Nationwide Legal, LLC, USDC CENTRAL DISTRICT, DELIVER COURTESY^186471	1.00	21.00	WO	HD TR_____
01/11/19	2493696	Messenger -- Federal Express Invoice No: 643414110 2369 Ship To: Norman Aspis	1.00	19.47	WO	HD TR_____
01/14/19	2493697	Messenger -- Federal Express Invoice No: 643414110 2369 Ship To: Norman Aspis	1.00	14.30	WO	HD TR_____
01/14/19	2493698	Messenger -- Federal Express Invoice No: 643414110 2369 Ship To: Norman Aspis	1.00	21.01	WO	HD TR_____
01/14/19	2493699	Messenger -- Federal Express Invoice No: 643414110 2369 Ship To: Norman Aspis	1.00	21.01	WO	HD TR_____
01/14/19	2493700	Messenger -- Federal Express Invoice No: 643414110 2369 Ship To: Norman Aspis	1.00	21.01	WO	HD TR_____
01/15/19	2493701	Messenger -- Federal Express Invoice No: 643414110 2369 Ship To: Norman Aspis	1.00	21.01	WO	HD TR_____
01/15/19	2497419	Messenger -- Federal Express Invoice No: 644150975 2369 Ship To: Norman Aspis	1.00	21.01	WO	HD TR_____
01/16/19	2497420	Messenger -- Federal Express Invoice No: 644150975 2369 Ship To: Norman Aspis	1.00	21.01	WO	HD TR_____
01/16/19	2497421	Messenger -- Federal Express Invoice No: 644150975 2369 Ship To: Norman Aspis	1.00	21.01	WO	HD TR_____
01/18/19	2497416	Messenger -- Federal Express Invoice No: 644150975 2369 Ship To: Norman Aspis	1.00	21.01	WO	HD TR_____
01/18/19	2497422	Messenger -- Federal Express Invoice No: 644150975 1842 Ship To: Marshall Turner, Jr , CPA	1.00	12.46	WO	HD TR_____
01/18/19	2497423	Messenger -- Federal Express Invoice No: 644150975 1842 Ship To: Jonathan Liss, Esq	1.00	26.45	WO	HD TR_____
01/18/19	2497424	Messenger -- Federal Express Invoice No: 644150975 1842 Ship To: Peter A Umoff, Esq	1.00	12.46	WO	HD TR_____

Trans Date	Index	Type	Quantity	Amt	Circle	Action
01/18/19	2497425	Messenger -- Federal Express Invoice No: 644150975 1842 Ship To: Kevin M Yopp, Esq	1.00	12.46	WO	HD TR _____
01/22/19	2497417	Messenger -- Federal Express Invoice No: 644150975 1842 Ship To: Robert J Tmur, CPA	1.00	17.24	WO	HD TR _____
01/22/19	2497418	Messenger -- Federal Express Invoice No: 644150975 1842 Ship To: Linda D Coleman	1.00	12.57	WO	HD TR _____
01/23/19	2499095	Messenger -- Federal Express Invoice No: 644798203 1842 Ship To: Mark S Rattner, Esq	1.00	20.22	WO	HD TR _____
01/23/19	2499096	Messenger -- Federal Express Invoice No: 644798203 1842 Ship To: Douglas Q Hahn, Esq	1.00	12.57	WO	HD TR _____
01/23/19	2499097	Messenger -- Federal Express Invoice No: 644798203 1842 Ship To: Exec Dept or Office Mgr	1.00	12.57	WO	HD TR _____
01/23/19	2499098	Messenger -- Federal Express Invoice No: 644798203 1842 Ship To: Bruce W McRoy, Esq	1.00	12.57	WO	HD TR _____
01/24/19	2499082	Messenger -- Federal Express Invoice No: 644798203 1842 Ship To: Randolph Gaw, Esq	1.00	17.47	WO	HD TR _____
01/24/19	2499083	Messenger -- Federal Express Invoice No: 644798203 1842 Ship To: Sheryl Mintz Goski	1.00	20.61	WO	HD TR _____
01/24/19	2499084	Messenger -- Federal Express Invoice No: 644798203 1842 Ship To: Priya Sopori, Esq	1.00	12.57	WO	HD TR _____
01/24/19	2499085	Messenger -- Federal Express Invoice No: 644798203 1842 Ship To: Kevin R Nimmons	1.00	12.57	WO	HD TR _____
01/24/19	2499086	Messenger -- Federal Express Invoice No: 644798203 1842 Ship To: Christopher Auguste	1.00	20.61	WO	HD TR _____
01/24/19	2499087	Messenger -- Federal Express Invoice No: 644798203 1842 Ship To: Robert C Kopple, Esq	1.00	12.57	WO	HD TR _____
01/24/19	2499088	Messenger -- Federal Express Invoice No: 644798203 1842 Ship To: Attn Admin Offices	1.00	20.22	WO	HD TR _____

Trans Date	Index	Type	Quantity	Amt	Circle	Action
01/24/19	2499089	Messenger -- Federal Express Invoice No: 644798203 1842 Ship To: Hovik Adamyan, CFA	1.00	12.57	WO	HD TR_____
01/24/19	2499090	Messenger -- Federal Express Invoice No: 644798203 1842 Ship To: Michael Present, Esq	1.00	20.61	WO	HD TR_____
01/24/19	2499091	Messenger -- Federal Express Invoice No: 644798203 2369 Ship To: Norman Aspis	1.00	21.22	WO	HD TR_____
01/24/19	2499092	Messenger -- Federal Express Invoice No: 644798203 1842 Ship To: Attn Exec Admin Offices	1.00	20.61	WO	HD TR_____
01/24/19	2499093	Messenger -- Federal Express Invoice No: 644798203 1842 Ship To: Joshua P Rabinowitz	1.00	12.57	WO	HD TR_____
01/24/19	2499094	Messenger -- Federal Express Invoice No: 644798203 1842 Ship To: David S Hamilton	1.00	12.57	WO	HD TR_____
01/28/19	2497889	Text Editing ^Format Document USER DEFINED 1: 002243	0.10	3.00	WO	HD TR_____
02/04/19	2499353	Messenger -- Federal Express Invoice No: 645503238 Paid to: 2369 Ship To: Lee F Sachnoff	1.00	18.43	WO	HD TR_____
02/05/19	2506141	Recordation Fees - - Nationwide Legal, LLC, CR/SANTA BARBARA COUNTY RECORDER, NOTICE OF PENDENCY OF RECEIVERSHIP^188241	1.00	287.00	WO	HD TR_____
02/07/19	2501438	Messenger -- Federal Express Invoice No: 646218359 1842 Ship To: returns dept	1.00	12.98	WO	HD TR_____
02/11/19	2501439	Messenger -- Federal Express Invoice No: 646218359 1842 Ship To: Bob Tmur, CPA	1.00	12.60	WO	HD TR_____
02/15/19	2505998	Messenger -- Federal Express Invoice No: 646876102 2369 Ship To: NORMAN M ASPIS, ESQ	1.00	27.51	WO	HD TR_____
02/15/19	2505999	Messenger -- Federal Express Invoice No: 646876102 2369 Ship To: NORMAN M ASPIS, ESQ	1.00	33.33	WO	HD TR_____
02/19/19	2512840	Service of Process - - Nationwide Legal, LLC, AMERICAN EXPRESS, SUBPOENA FOR RECORDS^188913	1.00	115.00	WO	HD TR_____

Trans Date	Index	Type	Quantity	Amt	Circle	Action
02/19/19	2512841	Service of Process - - Nationwide Legal, LLC, DFS SERVICES, SUBPOENA FOR RECORDS^188913	1.00	45.00	WO	HD TR_____
02/19/19	2512842	Service of Process - - Nationwide Legal, LLC, AMERICAN RIVIERA BANK, SUBPOENA FOR RECORDS^188913	1.00	221.00	WO	HD TR_____
02/19/19	2512843	Service of Process - - Nationwide Legal, LLC, FIRST REPUBLIC SECURITIES, SUBPOENA FOR RECORDS^188913	1.00	185.00	WO	HD TR_____
02/19/19	2512844	Service of Process - - Nationwide Legal, LLC, WELLS FARGO BANK, SUBPOENA FOR RECORDS^188913	1.00	50.00	WO	HD TR_____
02/19/19	2512845	Service of Process - - Nationwide Legal, LLC, FIRST REPUBLIC BANK, SUBPOENA FOR RECORDS^188913	1.00	50.00	WO	HD TR_____
03/01/19	2508102	Messenger – Federal Express Invoice No: 648306121 2369 Ship To: John Hall	1.00	23.19	WO	HD TR_____
03/05/19	2508103	Messenger – Federal Express Invoice No: 648306121 2369 Ship To: Susan B Zaunbrecher	1.00	20.78	WO	HD TR_____
03/06/19	2512450	Service of Process - - Nationwide Legal, LLC, MERRILL LYNCH PEIRCE FENNER & SMITH, SUBPOENA^189743	1.00	115.00	WO	HD TR_____
03/06/19	2512451	Service of Process - - Nationwide Legal, LLC, BANK OF AMERICA, SUBPOENA^189743	1.00	45.00	WO	HD TR_____
03/06/19	2512452	Service of Process - - Nationwide Legal, LLC, GOLDMAN SACHS & CO., SUBPOENA^189743	1.00	45.00	WO	HD TR_____
03/06/19	2512453	Service of Process - - Nationwide Legal, LLC, JEFFERIES GROUP, SUBPOENA^189743	1.00	45.00	WO	HD TR_____
03/06/19	2512454	Service of Process - - Nationwide Legal, LLC, BANK OF NEW YORK MELLON CORP., SUBPOENA^189743	1.00	45.00	WO	HD TR_____
03/06/19	2512455	Service of Process - - Nationwide Legal, LLC, JP MORGAN CHASE, SUBPOENA^189743	1.00	45.00	WO	HD TR_____
03/06/19	2512456	Service of Process - - Nationwide Legal, LLC, UBS FINANCIAL SERVICES, SUBPOENA^189743	1.00	185.00	WO	HD TR_____

Trans Date	Index	Type	Quantity	Amt	Circle	Action
03/13/19	2512606	Messenger – Federal Express Invoice No: 649748284 2369 Ship To: John Hall	1.00	20.77	WO	HD TR _____

Proforma Summary

Timekeeper Number	rs	Timekeeper	Hours	Rate	Amounts
000313		David Zaro	1.8	742.50	1,336.50
001842		Joshua Del Castillo	40.9	562.50	23,006.25
002243		Alyssa Engstrom	3.9	351.00	1,368.90
002369		Norman Aspis	18.0	351.00	6,318.00
			<u>64.6</u>		<u>32,029.65</u>
Total Fees					32,029.65
Total Disbursements					3,203.13

Attorney Billing Instructions

<input type="checkbox"/> ()	BILL ALL	<input type="checkbox"/> ()	Hold
<input type="checkbox"/> ()	BILL FEES ONLY	<input type="checkbox"/> ()	Write Off
<input type="checkbox"/> ()	BILL COST ONLY	<input type="checkbox"/> ()	Transfer All

Billing Instructions

expires 6/30/2019: 10% off standard rates (automatic)

Account Summary- As Of 03/31/2019

	Fiscal YTD			Calendar YTD			LTD		
	Total	Fees	Disbursement	Total	Fees	Disbursement	Total	Fees	Disbursement
Worked	43,670.28	40,467.15	3,203.13	43,670.28	40,467.15	3,203.13	43,670.28	40,467.15	3,203.13
Unbilled Adj	(3,605.85)	(3,605.85)	0.00	(3,774.60)	(3,774.60)	0.00	(3,774.60)	(3,774.60)	0.00
Billed	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00
Collected	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00
AR Write Off	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00
WIP Balance	41,420.28	38,217.15	3,203.13						

<i>AR Balance</i>	<i>0.00</i>	<i>0.00</i>	<i>0.00</i>
<i>Unalloc Payment</i>	<i>0.00</i>		
<i>Client Trust Balance</i>	<i>0.00</i>		

Billing Address

Winkler, Geoff/Receiver for Essex Capital Corporation
Alvarez & Marsal LLC
100 Pine Street, Suite 900
San Francisco, CA 94111-5222
ATTN: Geoff Winkler

Preliminary Billing Form

Billing Atty: 001842 - Joshua Del Castillo

Matter #: 378224-00003

Matter Name: Asset Recovery & Management

Date of Last Billing:

Client Name: Winkler, Geoff/Receiver for Essex Capital Corporation

Proforma Number 1412438

Client/Matter Joint Group # 378224-1

Fees for Matter 378224-00003 (Asset Recovery & Management)

Trans Date	Index	Description of Service Rendered	Timekeeper	Hours	Fees	Sum	Circle Action
01/03/19	7713332	Review and respond to correspondence from Monitor and J. deNeve re bank account administration and release matters (0.6); e-mails re same (0.2).	Del Castillo, Joshua	0.8	450.00	450.00	WO HD TR_____
01/04/19	7713881	E-mails and teleconferences with Receiver, Receiver's office, and opposing counsel re asset recovery and release matters (1.5); review documents (0.3); teleconference with G. Leung re same (0.1).	Del Castillo, Joshua	1.9	1,068.75	1,518.75	WO HD TR_____
01/07/19	7716386	Email related to affirmative litigation claims and evaluation of potential recovery issues (.6).	Zaro, David	0.6	445.50	1,964.25	WO HD TR_____
01/08/19	7716429	Review and respond to correspondence from Receiver re asset recovery issues and follow-up calls and e-mails to third parties re same (0.6).	Del Castillo, Joshua	0.6	337.50	2,301.75	WO HD TR_____
01/09/19	7718769	Analysis of the claims for fraudulent conveyance and actions to recover assets, advice to counsel as to evidence/foundation (.6).	Zaro, David	0.6	445.50	2,747.25	WO HD TR_____

Trans Date	Index	Description of Service Rendered	Timekeeper	Hours	Fees	Sum	Circle	Action
01/09/19	7717118	Review and respond to correspondence from Receiver and MB&T counsel re meeting to discuss bank account and payment administration matters (0.5); review correspondence and documents re potential sources of asset recovery (1.0).	Del Castillo, Joshua	1.5	843.75	3,591.00	WO	HD TR_____
01/09/19	7740935	Review current leases associated with MBT loans.	Aspis, Norman	0.3	105.30	3,696.30	WO	HD TR_____
01/10/19	7740633	Review all active MBT loans (0.6).	Aspis, Norman	0.6	210.60	3,906.90	WO	HD TR_____
01/11/19	7720051	Analyze Amagansett Partners, LLC documents and confer with J. del Castillo regarding the same (1.0).	Aspis, Norman	1.0	351.00	4,257.90	WO	HD TR_____
01/11/19	7720052	Analyze Montecito Bank & Trust loan documents to determine the rights of both parties to the loans (1.0).	Aspis, Norman	1.0	351.00	4,608.90	WO	HD TR_____
01/14/19	7721419	Confer with atty I. Kallick re MB&T loans and upcoming meeting re same (0.2); prepare e-mails to Receiver re same (0.3).	Del Castillo, Joshua	0.5	281.25	4,890.15	WO	HD TR_____
01/15/19	7723151	Review materials relating to recovery and preservation of receivership assets and confer re same (0.8).	Del Castillo, Joshua	0.8	450.00	5,340.15	WO	HD TR_____
01/15/19	7723322	Analyze issues facing the receiver including, but not limited to, MBT loans, private equity transactions, Amagansett transaction, and 915 Elm Ave. Carp Valley Lumber LLC transaction (2.5).	Aspis, Norman	2.5	877.50	6,217.65	WO	HD TR_____
01/16/19	7723874	Review files related to 915 Elm Avenue CVL, LLC including, but not	Aspis, Norman	1.7	596.70	6,814.35	WO	HD TR_____

Trans Date	Index	Description of Service Rendered	Timekeeper	Hours	Fees	Sum	Circle	Action
		limited to, the operating agreement.						
01/17/19	7726044	Review and respond to correspondence re Receiver's anticipated release of Essex premises (0.2).	Del Castillo, Joshua	0.2	112.50	6,926.85	WO	HD TR_____
01/17/19	7739323	Review correspondence regarding from A. Wong regarding turnover of Essex's office space in Santa Barbara (0.2).	Aspis, Norman	0.2	70.20	6,997.05	WO	HD TR_____
01/25/19	7732221	Review correspondence re capital call demand and analysis of issues re same (0.5).	Del Castillo, Joshua	0.5	281.25	7,278.30	WO	HD TR_____
01/28/19	7734196	Analysis of issues related to the Amagansett investment/capital call (.4).	Zaro, David	0.4	297.00	7,575.30	WO	HD TR_____
01/28/19	7732894	Attention to asset administration and recovery issues and confer with Receiver, pre-receivership counsel, and counsel re same (1.9); prepare written demands for turnover of receivership assets (1.0).	Del Castillo, Joshua	2.9	1,631.25	9,206.55	WO	HD TR_____
01/29/19	7736097	Meeting to address approach to investments, capital calls and email re strategy (.4). Review of draft letter response as to investment (.2).	Zaro, David	0.6	445.50	9,652.05	WO	HD TR_____
01/29/19	7734841	E-mails and teleconferences with Receiver and counsel re asset administration matters (0.8).	Del Castillo, Joshua	0.8	450.00	10,102.05	WO	HD TR_____
01/30/19	7738243	Analysis of the Montecito Bank & Trust issues/loan terms and rights of the parties per loan documents (.6). Review draft letter, advice to counsel.	Zaro, David	0.9	668.25	10,770.30	WO	HD TR_____

Trans Date	Index	Description of Service Rendered	Timekeeper	Hours	Fees	Sum	Circle	Action
		re same (.3).						
01/30/19	7735888	Confer with Receiver and counsel and prepare correspondence re asset administration and management issues (1.2).	Del Castillo, Joshua	1.2	675.00	11,445.30	WO	HD TR_____
01/31/19	7737884	Confer with Receiver and counsel re asset recovery and administration issues and review documents in connection with same (1.0); specific review of materials and correspondence re CVL transaction and attention to issues re same (0.5).	Del Castillo, Joshua	1.5	843.75	12,289.05	WO	HD TR_____
01/31/19	7737518	Prepare for and participate in teleconference with J. Gally and G. Winkler regarding CVL.	Aspis, Norman	0.6	210.60	12,499.65	WO	HD TR_____
02/01/19	7741335	Review CVL-associated documents and confer re same (0.8).	Del Castillo, Joshua	0.8	450.00	12,949.65	WO	HD TR_____
02/01/19	7765745	Confer with counsel regarding CVL promissory notes.	Aspis, Norman	0.2	70.20	13,019.85	WO	HD TR_____
02/04/19	7745000	Analysis of the accounting issues/legal requirements for recovery/control over contracts, MBT interference with servicing, advice as to records (.7).	Zaro, David	0.7	519.75	13,539.60	WO	HD TR_____
02/05/19	7745034	Advice to counsel regarding the transfers/distributions to third parties, interest in Carpenteria Valley Lumber (.3).	Zaro, David	0.3	222.75	13,762.35	WO	HD TR_____
02/05/19	7744545	Attention to asset recovery matters and prepare third party correspondence re same (0.6).	Del Castillo, Joshua	0.6	337.50	14,099.85	WO	HD TR_____
02/05/19	7744528	Review termination agreement	Shapiro, Maxwell	0.3	133.65	14,233.50	WO	HD TR_____

Trans Date	Index	Description of Service Rendered	Timekeeper	Hours	Fees	Sum	Circle	Action
02/06/19	7746582	Review of documents/records related to Amagansett interests/assets letter (.4). Email/conference related to interests/strategy for Receiver (.2).	Zaro, David	0.6	445.50	14,679.00	WO	HD TR_____
02/06/19	7745247	Review Amagansett buyout correspondence and confer with counsel re same (0.3).	Del Castillo, Joshua	0.3	168.75	14,847.75	WO	HD TR_____
02/07/19	7749619	Further analysis of issues/strategy re Amagansett investment issues/legal issues as to capital calls/advice to Receiver counsel (.5). Follow-up on Carpinteria Lumber asset and receiver's strategy to recover value/timing (.3).	Zaro, David	0.8	594.00	15,441.75	WO	HD TR_____
02/07/19	7746658	Confer with Receiver and counsel and e-mails to I. Kallick re MBT servicing of Essex leases (0.5); attention to other asset recovery matters (0.5).	Del Castillo, Joshua	1.0	562.50	16,004.25	WO	HD TR_____
02/08/19	7750514	Analysis of further issues related to servicing and operations, recovery of assets, control as to MBT, follow-up with counsel (0.5).	Zaro, David	0.5	371.25	16,375.50	WO	HD TR_____
02/08/19	7747565	Review documents and correspondence and confer with Receiver re potential asset disposition matters (1.1); review and respond to correspondence from MBT counsel re servicing and confer re same (0.6).	Del Castillo, Joshua	1.7	956.25	17,331.75	WO	HD TR_____
02/11/19	7748979	Attention to asset administration inquiries and prepare update to counsel for G. Grant re Amagansett purchase offer (2.3); confer with	Del Castillo, Joshua	3.0	1,687.50	19,019.25	WO	HD TR_____

Trans Date	Index	Description of Service Rendered	Timekeeper	Hours	Fees	Sum	Circle	Action
		counsel re lease rejection and termination (0.7).						
02/11/19	7750391	Continue to review termination agreement	Shapiro, Maxwell	0.4	178.20	19,197.45	WO HD	TR_____
02/12/19	7750586	Review correspondence re pending lease revenues and confer with Receiver and counsel re same (0.7); attention to other asset recovery issues and prepare inquiries to Receiver, counsel, and third parties re same (1.1); confer with counsel and attention to issues re release of former receivership property (0.5).	Del Castillo, Joshua	2.3	1,293.75	20,491.20	WO HD	TR_____
02/13/19	7751633	Review and comment re Essex lease termination agreement revisions (0.3); attention to receivership asset inventory and marshaling strategy (0.7); confer with counsel re same (0.4)..	Del Castillo, Joshua	1.4	787.50	21,278.70	WO HD	TR_____
02/13/19	7754011	Revise termination agreement	Shapiro, Maxwell	1.6	712.80	21,991.50	WO HD	TR_____
02/15/19	7753908	Review and respond to correspondence re abandonment of Essex SB office and confer re status of lease termination agreement re same (0.2); review correspondence re CVL from counsel and confer with counsel re same (1.1).	Del Castillo, Joshua	1.3	731.25	22,722.75	WO HD	TR_____
02/19/19	7755631	Confer with counsel re issues associated with preliminary injunction and freeze of CVL property (0.6); prepare notes for teleconference with CVL counsel re same (0.5).	Del Castillo, Joshua	1.1	618.75	23,341.50	WO HD	TR_____
02/20/19	7760318	Analysis of assets, third party	Zaro, David	0.7	519.75	23,861.25	WO HD	TR_____

Trans Date	Index	Description of Service Rendered	Timekeeper	Hours	Fees	Sum	Circle	Action
		interests and scope of Receiver versus individual defendants interests, approach to recovery (.4). Advice to counsel as to asset recovery issues, the Carpinteria Lumberyard interests/strategy and accounting issues (.3).						
02/20/19	7756733	Teleconference with D. Cousineau re CVL concerns and follow-up with Receiver re same (0.7); review and respond to correspondence re lease termination agreement (0.2).	Del Castillo, Joshua	0.9	506.25	24,367.50	WO	HD TR_____
02/21/19	7757795	Review documents and confer with counsel re CVL transactions (1.0); prepare inquiry to CVL counsel re same (0.1); review documents associated with other Iannelli transactions involving Essex funds (1.1); legal analysis of quasi-subrogation question (1.1).	Del Castillo, Joshua	3.3	1,856.25	26,223.75	WO	HD TR_____
02/21/19	7765322	Review documents related to CVL (.9); confer with counsel regarding the same (.4); confer with P. Umoff regarding the same (.2).	Aspis, Norman	1.5	526.50	26,750.25	WO	HD TR_____
02/22/19	7760067	Review and respond to correspondence re CVL transaction and accounting of payments for same (0.5); confer with counsel (0.3).	Del Castillo, Joshua	0.8	450.00	27,200.25	WO	HD TR_____
02/25/19	7760449	Attention to suspect transactions and potential asset recovery matters (1.0).	Del Castillo, Joshua	1.0	562.50	27,762.75	WO	HD TR_____
02/26/19	7761456	Attention to lease termination issues and correspondence re same (0.3); review documents re certain assets implicated by defendant funds	Del Castillo, Joshua	0.8	450.00	28,212.75	WO	HD TR_____

Trans Date	Index	Description of Service Rendered	Timekeeper	Hours	Fees	Sum	Circle	Action
		transfers and attention to issues re same (0.5).						
02/26/19	7762444	Review comments to termination agreement; Revise same	Shapiro, Maxwell	0.4	178.20	28,390.95	WO	HD TR_____
02/26/19	7763747	Review edits to sublease termination agreement; confer with counsel regarding the same.	Aspis, Norman	0.3	105.30	28,496.25	WO	HD TR_____
02/28/19	7764889	Review documents in connection with T2 Biosystems lease and prepare correspondence to lessee re same (1.0); confer with Receiver and counsel re same (0.5); review materials associated with other receivership entity transactions and assets and legal analysis of prospective disgorgement matter (1.4).	Del Castillo, Joshua	2.9	1,631.25	30,127.50	WO	HD TR_____
02/28/19	7765246	Review lease agreement with T2 BioSystems, Inc. (.3); confer with J. del Castillo regarding the same (.3) and draft email to Receiver and counsel regarding the same (.2) review MBT loan documents regarding T2 BioSystems, Inc. transaction and email J. del Castillo regarding the same (.3); review Seed Mackall LLP production regarding T2 BioSystems, Inc. (.4).	Aspis, Norman	1.5	526.50	30,654.00	WO	HD TR_____
03/01/19	7794281	Draft outstanding subpoenas to financial institutions.	Aspis, Norman	2.1	737.10	31,391.10	WO	HD TR_____
03/02/19	7768725	Review documents and analysis of prospective disgorgement claims (1.5).	Del Castillo, Joshua	1.5	843.75	32,234.85	WO	HD TR_____

Trans Date	Index	Description of Service Rendered	Timekeeper	Hours	Fees	Sum	Circle	Action
03/04/19	7768914	Review Grant settlement correspondence and associated documents (1.0); prepare update to Receiver re same (0.3).	Del Castillo, Joshua	1.3	731.25	32,966.10	WO	HD TR _____
03/05/19	7770419	Correspondence with J. Hall re J. Grant transactions and Receiver's preliminary conclusions re same (0.3); confer with counsel re same (0.3); review and respond to correspondence from J. Sprague re T2 Biosystems lease (0.2); correspondence re Essex property lease termination agreement (0.2).	Del Castillo, Joshua	1.0	562.50	33,528.60	WO	HD TR _____
03/05/19	7796177	Draft memorandum regarding CVL (1.5); confer with J. Hall regarding offering documents (.2); review and transmit sublease termination agreement (.2).	Aspis, Norman	1.9	666.90	34,195.50	WO	HD TR _____
03/06/19	7773342	Call with counsel, analysis of the issues related to servicing and management/enforcement issues (.4). Review email re the Elm Ave CVL LLC (.3).	Zaro, David	0.7	519.75	34,715.25	WO	HD TR _____
03/07/19	7775730	Review/analysis of issues related to the Carpinteria Valley Lumber CVL, loans and Reyner dispute, conference with counsel (0.7).	Zaro, David	0.7	519.75	35,235.00	WO	HD TR _____
03/07/19	7796701	Confer with J. Hall regarding Class B Units of Amagansett (.2); review and transmit offering documents (.3); draft memorandum regarding Amagansett (.9).	Aspis, Norman	1.4	491.40	35,726.40	WO	HD TR _____
03/11/19	7777220	Research and analysis of the 915 Elm	Zaro, David	2.2	1,633.50	37,359.90	WO	HD TR _____

Trans Date	Index	Description of Service Rendered	Timekeeper	Hours	Fees	Sum	Circle Action
		Avenue CVL, LLC agreements, financial documents concerning loans and associated email/letters (1.8). Calls with counsel and address the CLV issues/strategy (.4).					
03/11/19	7776000	Confer with counsel and review documents in connection with asset administration inquiries (0.8); correspondence re CVL transaction and confer re same (0.5).	Del Castillo, Joshua	1.3	731.25	38,091.15	WO HD TR_____
03/11/19	7796943	Confer with counsel regarding Amagansett, CVL, and general receivership updates (.9); update memorandum regarding Amagansett (0.5); review Terrapin Leasing issues (.5).	Aspis, Norman	1.9	666.90	38,758.05	WO HD TR_____
03/12/19	7778231	Further analysis and conference related to CVL/915 Elm Avenue matter, follow-up call with Receiver (.4).	Zaro, David	0.4	297.00	39,055.05	WO HD TR_____
03/14/19	7780423	Conference with counsel concerning the foundation/records to support recovery of CVL (.4). Follow-up on the records concerning the CVL transaction (.2).	Zaro, David	0.6	445.50	39,500.55	WO HD TR_____
03/18/19	7782401	Attention to asset investigation and recovery questions and confer with counsel and Receiver's office re same (0.6).	Del Castillo, Joshua	0.6	337.50	39,838.05	WO HD TR_____
03/19/19	7782907	Confer with counsel re asset recovery matters and review documents re same (0.5); review and respond to correspondence re Amagansett investment and proposed settlement	Del Castillo, Joshua	1.0	562.50	40,400.55	WO HD TR_____

Trans Date	Index	Description of Service Rendered	Timekeeper	Hours	Fees	Sum	Circle	Action
		(0.5).						
03/19/19	7794176	Confer with counsel regarding Amagansett and CVL.	Aspis, Norman	0.4	140.40	40,540.95	WO	HD TR_____
03/20/19	7785512	Several calls with counsel to address the Amagassett and other investments/securing recoveries and follow-up (.4).	Zaro, David	0.4	297.00	40,837.95	WO	HD TR_____
03/20/19	7794088	Conduct research regarding confidential treatment documents based on joint defense privilege (.5); review pre-receivership bills and transmit to counsel (.2); teleconference with J. Hall regarding Beamreach and confer with counsel regarding the same (.4); teleconference with Seed Mackall regarding Beamreach (.5); Essex weekly call (.5); teleconference with J. Hall regarding preliminary Iannelli accounting (.3).	Aspis, Norman	2.4	842.40	41,680.35	WO	HD TR_____
03/25/19	7787908	E-mails and teleconferences with counsel and Receiver's office re identification of prospective disgorgement or damages claims (1.0); review documents re same (0.7).	Del Castillo, Joshua	1.7	956.25	42,636.60	WO	HD TR_____
03/26/19	7790528	Call related to the Receiver's interests in the Carpenteria Valley lumber entity (.2). Email to CVL to address documents/records concerning the transaction (.2).	Zaro, David	0.4	297.00	42,933.60	WO	HD TR_____
03/26/19	7789706	E-mails and teleconferences re CVL , Amagansett, and other potential asset	Del Castillo, Joshua	0.7	393.75	43,327.35	WO	HD TR_____

Trans Date	Index	Description of Service Rendered	Timekeeper	Hours	Fees	Sum	Circle	Action
		recovery items (0.7).						
03/27/19	7790239	Review documents, e-mails, and teleconferences re Amagansett and associated assets and transactions (2.1).	Del Castillo, Joshua	2.1	1,181.25	44,508.60	WO	HD TR_____
03/28/19	7791202	Review documents, e-mails, and teleconferences with Receiver's office and counsel re asset identification, recovery, and associated analysis (3.0).	Del Castillo, Joshua	3.0	1,687.50	46,196.10	WO	HD TR_____
03/29/19	7793130	Review and respond to correspondence re asset recovery matters and review and transmit associated documents (1.1).	Del Castillo, Joshua	1.1	618.75	46,814.85	WO	HD TR_____

Proforma Summary

Timekeeper Number	Timekeeper	Hours	Rate	Amounts
000313	David Zaro	12.1	742.50	8,984.25
001842	Joshua Del Castillo	51.7	562.50	29,081.25
002149	Maxwell Shapiro	2.7	445.50	1,202.85
002369	Norman Aspis	21.5	351.00	7,546.50
		<u>88.0</u>		<u>46,814.85</u>
Total Fees				46,814.85
Total Disbursements				0.00

Attorney Billing Instructions

<input type="checkbox"/>	BILL ALL	<input type="checkbox"/>	Hold
<input type="checkbox"/>	BILL FEES ONLY	<input type="checkbox"/>	Write Off
<input type="checkbox"/>	BILL COST ONLY	<input type="checkbox"/>	Transfer All

Billing Instructions

expires 6/30/2019: 10% off standard rates (automatic)

Account Summary- As Of 03/31/2019

	Fiscal YTD			Calendar YTD			LTD		
	Total	Fees	Disbursement	Total	Fees	Disbursement	Total	Fees	Disbursement
Worked	51,610.95	51,610.95	0.00	51,610.95	51,610.95	0.00	51,610.95	51,610.95	0.00
Unbilled Adj	(367.20)	(367.20)	0.00	(437.40)	(437.40)	0.00	(437.40)	(437.40)	0.00
Billed	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00
Collected	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00
AR Write Off	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00
	Total	Fees	Cost						
WIP Balance	57,725.10	57,725.10	0.00						
AR Balance	0.00	0.00	0.00						
Unalloc Payment	0.00								
Client Trust Balance	0.00								

Billing Address

Winkler, Geoff/Receiver for Essex Capital Corporation
 Alvarez & Marsal LLC
 100 Pine Street, Suite 900
 San Francisco, CA 94111-5222
 ATTN: Geoff Winkler

Preliminary Billing Form

Billing Atty: 001842 - Joshua Del Castillo

Matter #: 378224-00004

Matter Name: Investigation/Reporting

Date of Last Billing:

Client Name: Winkler, Geoff/Receiver for Essex Capital Corporation

Proforma Number 1412439

Client/Matter Joint Group # 378224-1

Fees for Matter 378224-00004 (Investigation/Reporting)

Trans Date	Index	Description of Service Rendered	Timekeeper	Hours	Fees	Sum	Circle	Action
01/03/19	7713433	Analysis of documents/case findings, records and assets and affirmative claims, potential asset recovery strategy (1.7).	Zaro, David	1.7	1,262.25	1,262.25	WO	HD TR_____
01/04/19	7715430	Analysis of accounting as to net winners, claw back, fraudulent conveyances issues (.8). Follow-up with counsel to advise as to the subpoenas and document recovery (.4).	Zaro, David	1.2	891.00	2,153.25	WO	HD TR_____
01/04/19	7741172	Review correspondence regarding Iannelli's trust accounts and insurance policies.	Aspis, Norman	0.5	175.50	2,328.75	WO	HD TR_____
01/07/19	7715352	E-mails and teleconference with Receiver and counsel re document review and analysis and related matters (0.9).	Del Castillo, Joshua	0.9	506.25	2,835.00	WO	HD TR_____
01/08/19	7718757	Call with counsel and analysis of the discovery requirements for accounting and advice related to subpoenas (.4). Review letter/claimants assertion of defenses related to fraudulent conveyance	Zaro, David	1.1	816.75	3,651.75	WO	HD TR_____

Trans Date	Index	Description of Service Rendered	Timekeeper	Hours	Fees	Sum	Circle	Action
		claims (.7).						
01/08/19	7716448	Confer with counsel re document recovery and review matters (0.5).	Del Castillo, Joshua	0.5	281.25	3,933.00	WO	HD TR_____
01/08/19	7741070	Confer with J. del Castillo regarding Amagansett transaction.	Aspis, Norman	0.4	140.40	4,073.40	WO	HD TR_____
01/09/19	7740876	Correspond with J. Hall regarding MBT documents.	Aspis, Norman	0.3	105.30	4,178.70	WO	HD TR_____
01/09/19	7741037	Review correspondence with counsel for MBT.	Aspis, Norman	0.5	175.50	4,354.20	WO	HD TR_____
01/15/19	7723113	Review/analysis of the MBT loans, loan agreement and assess Receiver's role, rights, response (1.0). Analysis of records and attend meeting to further investigate assets/claims background as to Essex and parties (2.0).	Zaro, David	3.0	2,227.50	6,581.70	WO	HD TR_____
01/15/19	7723152	Prepare template document request to pre-receivership counsel (0.5).	Del Castillo, Joshua	0.5	281.25	6,862.95	WO	HD TR_____
01/16/19	7740116	Review Essex investor overview detailing net winners and net losers.	Aspis, Norman	0.4	140.40	7,003.35	WO	HD TR_____
01/17/19	7739245	Draft turnover demand letters to pre-receivership service providers.	Aspis, Norman	1.2	421.20	7,424.55	WO	HD TR_____
01/17/19	7739257	Review correspondence from K. Yopp.	Aspis, Norman	0.4	140.40	7,564.95	WO	HD TR_____
01/18/19	7739190	Review correspondence from P. Umoff at Seed Mackall (0.2).	Aspis, Norman	0.2	70.20	7,635.15	WO	HD TR_____
01/18/19	7739194	Correspond with J. Hall regarding contact information for turnover targets.	Aspis, Norman	0.2	70.20	7,705.35	WO	HD TR_____
01/18/19	7739195	Review correspondence from J. Liss	Aspis, Norman	0.8	280.80	7,986.15	WO	HD TR_____

Trans Date	Index	Description of Service Rendered	Timekeeper	Hours	Fees	Sum	Circle	Action
		at Gibbons P.C. regarding his representation of Essex in the Van Deventer matter, and the settlement agreement in that matter.						
01/18/19	7739208	Draft turnover demand letter to pre-receivership service providers to Essex.	Aspis, Norman	1.3	456.30	8,442.45	WO	HD TR_____
01/23/19	7729317	Review and respond to correspondence and calls from pre-receivership counsel and professionals re information and document requests (0.5); confer with counsel re same (0.4).	Del Castillo, Joshua	0.9	506.25	8,948.70	WO	HD TR_____
01/23/19	7738766	Review response from Seed Mackall to turnover letter and correspond with P. Umoff regarding the same.	Aspis, Norman	0.4	140.40	9,089.10	WO	HD TR_____
01/23/19	7738767	Correspond with M. Rattner at Riker Danzig regarding response to turnover letter.	Aspis, Norman	0.2	70.20	9,159.30	WO	HD TR_____
01/23/19	7738771	Correspond with J. Hall regarding potential services provided by Reicker to Essex.	Aspis, Norman	0.2	70.20	9,229.50	WO	HD TR_____
01/24/19	7730841	Review and respond to inquiries from pre-receivership counsel re document demands (0.7); teleconference with atty B. O'Donnell re same (0.2).	Del Castillo, Joshua	0.9	506.25	9,735.75	WO	HD TR_____
01/24/19	7738747	Review responses to turnover letters.	Aspis, Norman	0.7	245.70	9,981.45	WO	HD TR_____
01/25/19	7731033	Review and respond to correspondence in response to turnover letters and associated matters (0.7).	Del Castillo, Joshua	0.7	393.75	10,375.20	WO	HD TR_____
01/25/19	7738703	Review contact information for pre-	Aspis, Norman	0.2	70.20	10,445.40	WO	HD TR_____

Trans Date	Index	Description of Service Rendered	Timekeeper	Hours	Fees	Sum	Circle	Action
		receivership service providers.						
01/25/19	7738710	Review files transmitted by Tom Harding at Seed Mackall.	Aspis, Norman	0.4	140.40	10,585.80	WO	HD TR_____
01/28/19	7732497	Review CVL promissory notes.	Aspis, Norman	0.5	175.50	10,761.30	WO	HD TR_____
01/28/19	7732663	Teleconference with G. Winkler regarding MBT loan documents.	Aspis, Norman	0.3	105.30	10,866.60	WO	HD TR_____
01/28/19	7738595	Review letter from Hollister & Brace regarding services provided.	Aspis, Norman	0.3	105.30	10,971.90	WO	HD TR_____
01/29/19	7738511	Confer with J. del Castillo regarding CVL transaction.	Aspis, Norman	0.4	140.40	11,112.30	WO	HD TR_____
01/29/19	7738522	Correspond with J. Rabinowitz at Fell Marking.	Aspis, Norman	0.2	70.20	11,182.50	WO	HD TR_____
01/30/19	7736254	Follow-up with pre-receivership legal and professional service providers.	Aspis, Norman	2.5	877.50	12,060.00	WO	HD TR_____
01/30/19	7736269	Review sublease termination agreement by and between MUFG Union Bank, N.A. and Essex Capital Corporation.	Aspis, Norman	0.8	280.80	12,340.80	WO	HD TR_____
01/31/19	7737663	Review and respond to correspondence re document recovery matters and confer with Receiver's office and counsel re same (0.7); review schedule provided by Receiver (0.1).	Del Castillo, Joshua	0.8	450.00	12,790.80	WO	HD TR_____
01/31/19	7738334	Teleconference with pre-receivership mediator S. Mintz Goski regarding mediation between Essex/Iannelli and Van Deventer.	Aspis, Norman	0.4	140.40	12,931.20	WO	HD TR_____
01/31/19	7738349	Correspond with J. Gally regarding CVL documents.	Aspis, Norman	0.4	140.40	13,071.60	WO	HD TR_____

Trans Date	Index	Description of Service Rendered	Timekeeper	Hours	Fees	Sum	Circle	Action
02/04/19	7750971	Analysis and determination of client documents in preparation for attorney review (2.0).	Peng, Simona	2.0	549.00	13,620.60	WO	HD TR_____
02/04/19	7765771	Teleconference with counsel for G. Yoshimura and P. Caplan.	Aspis, Norman	0.3	105.30	13,725.90	WO	HD TR_____
02/05/19	7745031	Analysis of legal issues, records related to the Montecito Bank & Trust, call with counsel (.4). Evaluate issues related to the lease in NYC (.3). Address the Receiver accounting scope/subpoenas (.4).	Zaro, David	1.1	816.75	14,542.65	WO	HD TR_____
02/05/19	7744484	Attention to discovery issues and e-mails and teleconferences re same (0.8).	Del Castillo, Joshua	0.8	450.00	14,992.65	WO	HD TR_____
02/06/19	7745236	Confer with counsel re outstanding subpoenas (0.7); review and respond to correspondence from Receiver's office re subpoenas (0.2); review and respond to correspondence from third parties re document and information requests (0.5).	Del Castillo, Joshua	1.4	787.50	15,780.15	WO	HD TR_____
02/06/19	7747507	Strategy re: bank subpoenas and attend to outstanding tasks (0.3).	Engstrom, Alyssa	0.3	105.30	15,885.45	WO	HD TR_____
02/06/19	7765741	Confer with counsel regarding subpoenas.	Aspis, Norman	0.4	140.40	16,025.85	WO	HD TR_____
02/07/19	7746663	Confer with counsel and attention to subpoena and document request matters (0.9).	Del Castillo, Joshua	0.9	506.25	16,532.10	WO	HD TR_____
02/08/19	7748422	Review draft subpoenas and confer with counsel re status and strategy re same (0.5).	Del Castillo, Joshua	0.5	281.25	16,813.35	WO	HD TR_____

Trans Date	Index	Description of Service Rendered	Timekeeper	Hours	Fees	Sum	Circle	Action
02/08/19	7751881	Draft template for attachment to bank subpoenas and confer with N.Apsis re same (1.0).	Engstrom, Alyssa	1.0	351.00	17,164.35	WO	HD TR_____
02/11/19	7766706	Prepare for and participate in teleconference with B. Tmur, a pre-receivership accountant (.6); draft updated demand letter for B. Tmur (.2); review TIN for receivership entities (.1).	Aspis, Norman	0.7	245.70	17,410.05	WO	HD TR_____
02/12/19	7749998	Attention to subpoena, discovery, and other document recovery and review matters (0.9).	Del Castillo, Joshua	0.9	506.25	17,916.30	WO	HD TR_____
02/12/19	7751898	Strategy re: bank subpoenas and attachments	Engstrom, Alyssa	0.6	210.60	18,126.90	WO	HD TR_____
02/13/19	7766559	Draft subpoenas to various financial institutions (.2); prepare for and participate in teleconference with counsel at Kutak Rock LLP (.3).	Aspis, Norman	0.5	175.50	18,302.40	WO	HD TR_____
02/13/19	7766566	Teleconference with J. Hall regarding receivership updates and subpoena issues.	Aspis, Norman	0.4	140.40	18,442.80	WO	HD TR_____
02/14/19	7755867	Call with investor related to accounting/reporting and background issues (.2). Emails/call with counsel to address accounting issues, reporting and notice-website issues (.4).	Zaro, David	0.6	445.50	18,888.30	WO	HD TR_____
02/15/19	7764337	Begin indexing records received from Seed & Mackall (1.0).	Lopez, George	1.0	274.50	19,162.80	WO	HD TR_____
02/15/19	7765681	Draft subpoenas to various financial institutions (2.0).	Aspis, Norman	2.0	702.00	19,864.80	WO	HD TR_____
02/19/19	7755612	Confer with counsel re recent document productions and attendant	Del Castillo, Joshua	1.1	618.75	20,483.55	WO	HD TR_____

Trans Date	Index	Description of Service Rendered	Timekeeper	Hours	Fees	Sum	Circle	Action
		review (0.6); review and provide notice of subpoenas (0.5).						
02/19/19	7764357	Complete index of records received from Seed & Mackall (1.3).	Lopez, George	1.3	356.85	20,840.40	WO	HD TR_____
02/19/19	7755075	Revise certain subpoenas (.3); correspond with J. Hall regarding the same (.2); correspond with pre-receivership service providers (.3).	Aspis, Norman	0.8	280.80	21,121.20	WO	HD TR_____
02/19/19	7765575	Confer with counsel regarding subpoenas.	Aspis, Norman	0.3	105.30	21,226.50	WO	HD TR_____
02/20/19	7756931	Prepare e-mails to third parties re pending document requests and associated matters (0.5); teleconference with J. de Neve re same and follow-up on same with counsel (0.5).	Del Castillo, Joshua	1.0	562.50	21,789.00	WO	HD TR_____
02/21/19	7765298	Confer with S. Peng regarding review of document production from Seed Mackall LLP.	Aspis, Norman	0.3	105.30	21,894.30	WO	HD TR_____
02/22/19	7758510	Correspond with representatives at First Republic Securities, Co. and Wells Fargo regarding subpoenas (.4); correspond with J. Hall regarding First Republic Securities, Co. subpoena (.2); review production from First Republic Securities, Co. and transmit to J. Hall (.4); correspond with J. Hall regarding Cornerstone Essex Leasing Co. LLC (.2); review available information on Choice Bank and correspond with J. Hall regarding the same (.2); correspond with pre-receivership service providers (.3); review productions from pre-	Aspis, Norman	4.2	1,474.20	23,368.50	WO	HD TR_____

Trans Date	Index	Description of Service Rendered	Timekeeper	Hours	Fees	Sum	Circle	Action
		receivership service providers (2.5).						
02/22/19	7759692	Finalize subpoenas to E*TRADE, Merrill Lynch, Bank of NY, and UBS.	Aspis, Norman	0.4	140.40	23,508.90	WO	HD TR_____
02/23/19	7760437	Attention to document discovery matters and prepare updates and status inquiries re same (1.0).	Del Castillo, Joshua	1.0	562.50	24,071.40	WO	HD TR_____
02/25/19	7761039	Confer with counsel and Receiver's office re document requests and additional information required in connection with pre-receivership transactions (0.9).	Del Castillo, Joshua	0.9	506.25	24,577.65	WO	HD TR_____
02/25/19	7763820	Teleconference with J. Hall regarding Damitz Brooks production (.2); teleconference with C. Harris at Damitz Brooks regarding production (.3); confer with counsel regarding Cornerstone Essex Leasing (.2); Teleconference with S. Brooke Thompson regarding subpoena to American Riviera Bank (.1) and review written objections regarding the same (.2); confer with S. Peng regarding document download protocol for pre-receivership documents (.2).	Aspis, Norman	1.2	421.20	24,998.85	WO	HD TR_____
02/26/19	7761156	E-mails and teleconferences re pending and anticipated discovery (1.5); review documents and attention to discovery follow-up matters (1.0).	Del Castillo, Joshua	2.5	1,406.25	26,405.10	WO	HD TR_____
02/26/19	7763744	Prepare for and participate in teleconference with B. O'Donnell at Riker Danzig (.5); confer with counsel regarding subpoenas for certain entities, and draft the same (.6);	Aspis, Norman	2.1	737.10	27,142.20	WO	HD TR_____

Trans Date	Index	Description of Service Rendered	Timekeeper	Hours	Fees	Sum	Circle	Action
		correspond with J. Hall regarding new accounts requiring subpoenas (.3); obtain and review property report for 266 Penny Lane, Santa Barbara, CA 93108 and confer with counsel regarding the same (.4); review transactions involving Amagansett Partners LLC and confer with counsel regarding the same (.3).						
02/27/19	7763309	Attention to discovery and document production matters (0.7); review and revise draft supplemental demand for documents (0.5).	Del Castillo, Joshua	1.2	675.00	27,817.20	WO	HD TR_____
02/27/19	7763740	Correspond with counsel for American Riviera Bank and J. Hall regarding scope of subpoena, and amend same (.6); correspond with pre-receivership service providers and review documents from Damitz Brooks and Gaw Poe (.5); draft follow-up letter to B. O'Donnell at Riker Danzig regarding request for production of documents (.5).	Aspis, Norman	1.6	561.60	28,378.80	WO	HD TR_____
02/28/19	7764894	Confer with counsel and review and respond to correspondence re pending and anticipated document subpoenas and other discovery demands (0.8).	Del Castillo, Joshua	0.8	450.00	28,828.80	WO	HD TR_____
02/28/19	7763866	Teleconference with P. Kennison at Kutak Rock.	Aspis, Norman	0.3	105.30	28,934.10	WO	HD TR_____
02/28/19	7764012	Review correspondence and information regarding particular bank account and confer with counsel regarding the same (.3).	Aspis, Norman	0.3	105.30	29,039.40	WO	HD TR_____

Trans Date	Index	Description of Service Rendered	Timekeeper	Hours	Fees	Sum	Circle	Action
03/01/19	7769123	Several conferences and analysis of the issues related to transfers to third parties, accounting and foundation related to transfers, advice as to discovery (.7).	Zaro, David	0.7	519.75	29,559.15	WO	HD TR_____
03/01/19	7794278	Confer with counsel regarding subpoena to First Republic Bank.	Aspis, Norman	0.2	70.20	29,629.35	WO	HD TR_____
03/01/19	7801065	Teleconference with P. Umoff regarding Cornerstone Essex Holdings (.3).	Aspis, Norman	0.3	105.30	29,734.65	WO	HD TR_____
03/05/19	7796344	Update and transmit subpoenas to third-party financial institutions.	Aspis, Norman	0.9	315.90	30,050.55	WO	HD TR_____
03/06/19	7793609	Create index of files received from Gary Yoshimura.	Lopez, George	0.5	137.25	30,187.80	WO	HD TR_____
03/08/19	7796849	Teleconference with financial institutions regarding subpoena responses.	Aspis, Norman	0.3	105.30	30,293.10	WO	HD TR_____
03/11/19	7775989	Review and revise draft outline for Initial Report (0.5); prepare draft of key Initial Report sections and confer with counsel re same (3.0).	Del Castillo, Joshua	3.5	1,968.75	32,261.85	WO	HD TR_____
03/12/19	7778227	Analysis of the issues related to qualified settlement fund and entity tax issues, follow-up call with Receiver re same (.4).	Zaro, David	0.4	297.00	32,558.85	WO	HD TR_____
03/13/19	7778813	Attention to draft Interim Report and e-mails and teleconferences re same (1.1).	Del Castillo, Joshua	1.1	618.75	33,177.60	WO	HD TR_____
03/14/19	7779962	Attention to reporting issues and confer re analysis for presentation at mediation (0.5); review and follow-up on outstanding discovery requests	Del Castillo, Joshua	1.3	731.25	33,908.85	WO	HD TR_____

Trans Date	Index	Description of Service Rendered	Timekeeper	Hours	Fees	Sum	Circle	Action
		and e-mails re same (0.8).						
03/18/19	7782781	Analysis of transfers/accounting related to Iannelli transactions and receipts (.4). Prepare for/attend client/Receiver conference call (.8).	Zaro, David	1.2	891.00	34,799.85	WO	HD TR_____
03/18/19	7794212	Prepare for and participate in teleconference regarding Receiver's preliminary accounting for Mr. Iannelli. (1.0)	Aspis, Norman	1.0	351.00	35,150.85	WO	HD TR_____
03/18/19	7794214	Review correspondence from Riker Danzig and teleconference regarding the same.	Aspis, Norman	0.3	105.30	35,256.15	WO	HD TR_____
03/18/19	7794218	Teleconference regarding subpoenas.	Aspis, Norman	0.4	140.40	35,396.55	WO	HD TR_____
03/19/19	7794190	Draft subpoena to Jefferies (.2); review documents from Akerman LLP (.4).	Aspis, Norman	0.6	210.60	35,607.15	WO	HD TR_____
03/20/19	7785509	Analysis of the emails and review of documents related Vandevelt email related to claimant (.4).	Zaro, David	0.4	297.00	35,904.15	WO	HD TR_____
03/20/19	7794077	Review Jefferies response to subpoena.	Aspis, Norman	0.2	70.20	35,974.35	WO	HD TR_____
03/21/19	7785744	E-mails and teleconference with Receiver and counsel re Receiver's preliminary Iannelli accounting conclusions and associated matters (0.8).	Del Castillo, Joshua	0.8	450.00	36,424.35	WO	HD TR_____
03/21/19	7794052	Confer with counsel regarding subpoenas.	Aspis, Norman	0.3	105.30	36,529.65	WO	HD TR_____
03/22/19	7787441	Attention to accounting and reporting matters, review documents, and e-mails and teleconferences with	Del Castillo, Joshua	2.3	1,293.75	37,823.40	WO	HD TR_____

Trans Date	Index	Description of Service Rendered	Timekeeper	Hours	Fees	Sum	Circle	Action
		counsel and Receiver's office re same (2.3).						
03/22/19	7794028	Communicate with Receiver regarding subpoena status (.3); communicate with financial institutions regarding subpoena updates (.2); review production from Merrill Lynch (.5).	Aspis, Norman	1.0	351.00	38,174.40	WO	HD TR_____
03/23/19	7787469	Review documents and attention to reporting issues (1.5).	Del Castillo, Joshua	1.5	843.75	39,018.15	WO	HD TR_____
03/25/19	7787478	Confer with Receiver re accounting analysis and correspondence with defendant's counsel and SEC re same (0.7); teleconference re same (0.2); prepare for and teleconference with SEC (0.6); review and assemble materials for production and correspondence re same (0.9); attention to Initial Report matters (0.5).	Del Castillo, Joshua	2.9	1,631.25	40,649.40	WO	HD TR_____
03/25/19	7794018	Teleconference with third-party financial institutions regarding subpoena production.	Aspis, Norman	0.4	140.40	40,789.80	WO	HD TR_____
03/25/19	7794023	Review production of documents from third parties and transmit the same.	Aspis, Norman	0.4	140.40	40,930.20	WO	HD TR_____
03/26/19	7789699	E-mails and teleconferences re production of documents (0.7); confer re status of Initial Report (0.3).	Del Castillo, Joshua	1.0	562.50	41,492.70	WO	HD TR_____
03/26/19	7793967	Confer with counsel regarding Akerman production (.6).	Aspis, Norman	0.6	210.60	41,703.30	WO	HD TR_____
03/27/19	7790515	Confer with counsel re necessary additions and revisions to Initial	Del Castillo, Joshua	0.5	281.25	41,984.55	WO	HD TR_____

Trans Date	Index	Description of Service Rendered	Timekeeper	Hours	Fees	Sum	Circle	Action
		Interim Report (0.5).						
03/27/19	7793943	Prepare for and participate in teleconference with C. Plaza at Riker Danzig regarding document production.	Aspis, Norman	0.6	210.60	42,195.15	WO	HD TR_____
03/28/19	7792171	Extended e-mails and teleconferences with Receiver, defendant's counsel, and counsel re Receiver's preliminary accounting (1.5); review additional documents re same (0.6).	Del Castillo, Joshua	2.1	1,181.25	43,376.40	WO	HD TR_____
03/28/19	7801134	Revisions to Essex first Interim Report (3.0).	Aspis, Norman	3.0	1,053.00	44,429.40	WO	HD TR_____
03/29/19	7792634	Review documents and e-mails and teleconference with counsel and Receiver's office re preliminary Iannelli accounting (3.4).	Del Castillo, Joshua	3.4	1,912.50	46,341.90	WO	HD TR_____
03/29/19	7793782	Confer with counsel regarding Receiver's analysis of Mr. Iannelli's potential disgorgement (.5); teleconference with Receiver regarding the same (.5); review underlying documents regarding its calculation of potential disgorgement in anticipation of April 4 mediation (1.1); additional revisions to First Interim Report (1.8); review production from Locke Lord regarding Passaic bankruptcy proceedings (.4).	Aspis, Norman	3.5	1,228.50	47,570.40	WO	HD TR_____
03/30/19	7795601	Review correspondence and attention to accounting and reporting issues (1.5); review documents in connection with accounting and asset	Del Castillo, Joshua	3.0	1,687.50	49,257.90	WO	HD TR_____

Trans Date	Index	Description of Service Rendered	Timekeeper	Hours	Fees	Sum	Circle Action
		identification matters (1.5).					

Disbursements for Matter 378224-00004 (Investigation/Reporting)

Trans Date	Index	Type	Quantity	Amt	Circle Action
02/27/19	2508104	Messenger – Federal Express Invoice No: 648306121 2369 Ship To: Brian E O Donnell	1.00	27.84	WO HD TR_____
03/05/19	2508583	Messenger -- Federal Express Invoice No: 649144612 2369 Ship To: John Hall	1.00	21.18	WO HD TR_____

Proforma Summary

Timekeeper Number	Timekeeper	Hours	Rate	Amounts
000313	David Zaro	11.4	742.50	8,464.50
001842	Joshua Del Castillo	41.6	562.50	23,400.00
001928	George Lopez	2.8	274.50	768.60
002243	Alyssa Engstrom	1.9	351.00	666.90
002307	Simona Peng	2.0	274.50	549.00
002369	Norman Aspis	43.9	351.00	15,408.90
		<u>103.6</u>		<u>49,257.90</u>
Total Fees				49,257.90
Total Disbursements				49.02

Attorney Billing Instructions

<input type="checkbox"/> ()	BILL ALL	<input type="checkbox"/> ()	Hold
<input type="checkbox"/> ()	BILL FEES ONLY	<input type="checkbox"/> ()	Write Off
<input type="checkbox"/> ()	BILL COST ONLY	<input type="checkbox"/> ()	Transfer All

Billing Instructions

expires 6/30/2019: 10% off standard rates (automatic)

Account Summary- As Of 03/31/2019

	Fiscal YTD			Calendar YTD			LTD		
	Total	Fees	Disbursement	Total	Fees	Disbursement	Total	Fees	Disbursement
Worked	58,292.52	58,243.50	49.02	58,292.52	58,243.50	49.02	58,292.52	58,243.50	49.02
Unbilled Adj	(1,838.70)	(1,838.70)	0.00	(3,323.70)	(3,323.70)	0.00	(3,323.70)	(3,323.70)	0.00
Billed	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00
Collected	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00
AR Write Off	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00
	Total	Fees	Cost						
WIP Balance	68,699.67	68,650.65	49.02						
AR Balance	0.00	0.00	0.00						
Unalloc Payment	0.00								
Client Trust Balance	0.00								

Billing Address

Winkler, Geoff/Receiver for Essex Capital Corporation
 Alvarez & Marsal LLC
 100 Pine Street, Suite 900
 San Francisco, CA 94111-5222
 ATTN: Geoff Winkler

Preliminary Billing Form

Billing Atty: 001842 - Joshua Del Castillo

Matter #: 378224-00005

Matter Name: Investor Issues/Communications

Date of Last Billing:

Client Name: Winkler, Geoff/Receiver for Essex Capital Corporation

Proforma Number 1412440

Client/Matter Joint Group # 378224-1

Fees for Matter 378224-00005 (Investor Issues/Communications)

Trans Date	Index	Description of Service Rendered	Timekeeper	Hours	Fees	Sum	Circle	Action
01/17/19	7728331	Conferences and analysis re: investor town hall meeting and various issues related to same.	Farrell, Michael	0.6	405.00	405.00	WO	HD TR_____
01/17/19	7725356	E-mails and teleconference with Receiver re anticipated initial town hall meeting with investors (0.5); confer with counsel re same (0.5); teleconference with J. deNeve re same (0.1); confer with Receiver re additional meetings and discussions with counsel re same (0.9).	Del Castillo, Joshua	2.0	1,125.00	1,530.00	WO	HD TR_____
01/17/19	7739316	Prepare for and participate in teleconference with G. Winkler, J. del Castillo, and J. Hall regarding the investor meeting.	Aspis, Norman	0.5	175.50	1,705.50	WO	HD TR_____
01/21/19	7739114	Review, analysis and exchange of e-mails re: investor issues and strategy.	Farrell, Michael	0.2	135.00	1,840.50	WO	HD TR_____
01/22/19	7739101	Conference and analysis re: investor meeting issues and strategy (.3); conference call with client re: investor meeting and analysis re: same (.9); review and analysis of motion, report and appointment order and analysis re: effect of same on investor meeting	Farrell, Michael	2.3	1,552.50	3,393.00	WO	HD TR_____

Trans Date	Index	Description of Service Rendered	Timekeeper	Hours	Fees	Sum	Circle	Action
		issues (.9); exchanged e-mails with receiver (.2).						
01/22/19	7728026	Confer with counsel and e-mails and teleconferences with Receiver, counsel, and investor counsel re upcoming town hall and other investor communications matters (2.3).	Del Castillo, Joshua	2.3	1,293.75	4,686.75	WO	HD TR_____
01/23/19	7730439	Preparation for and participation in town hall meeting with investors (1.8); various conferences with clients and counsel re: planning for and results of meeting (.6).	Farrell, Michael	2.4	1,620.00	6,306.75	WO	HD TR_____
01/23/19	7729481	Teleconferences with Receiver and counsel re investor town hall meeting and contemplated telephonic meeting (0.5).	Del Castillo, Joshua	0.5	281.25	6,588.00	WO	HD TR_____
01/24/19	7730839	Teleconferences and e-mails with Receiver and counsel re anticipated telephonic investor town hall (0.7); review and comment on draft materials for same (0.3).	Del Castillo, Joshua	1.0	562.50	7,150.50	WO	HD TR_____
01/25/19	7730856	Prepare for and attend telephonic investor town hall and confer with Receiver re same (1.2).	Del Castillo, Joshua	1.2	675.00	7,825.50	WO	HD TR_____
02/05/19	7744481	Review and respond to third party inquiries (0.9).	Del Castillo, Joshua	0.9	506.25	8,331.75	WO	HD TR_____
02/14/19	7753744	Confer with counsel and Receiver re creditor status inquiries (0.9).	Del Castillo, Joshua	0.9	506.25	8,838.00	WO	HD TR_____
03/05/19	7770412	Review and respond to inquiry from SEC re Receiver's communications with investors (0.5).	Del Castillo, Joshua	0.5	281.25	9,119.25	WO	HD TR_____

Proforma Summary

Timekeeper Number	Timekeeper	Hours	Rate	Amounts
000739	Michael Farrell	5.5	675.00	3,712.50
001842	Joshua Del Castillo	9.3	562.50	5,231.25
002369	Norman Aspis	0.5	351.00	175.50
		<u>15.3</u>		<u>9,119.25</u>
Total Fees				9,119.25
Total Disbursements				0.00

Attorney Billing Instructions

- | | | | |
|-----|-----------------------|-----|---------------------|
| () | BILL ALL | () | Hold |
| () | BILL FEES ONLY | () | Write Off |
| () | BILL COST ONLY | () | Transfer All |

Billing Instructions

expires 6/30/2019: 10% off standard rates (automatic)

Account Summary- As Of 03/31/2019

	Fiscal YTD			Calendar YTD			LTD		
	Total	Fees	Disbursement	Total	Fees	Disbursement	Total	Fees	Disbursement
Worked	9,524.25	9,524.25	0.00	9,524.25	9,524.25	0.00	9,524.25	9,524.25	0.00
Unbilled Adj	(405.00)	(405.00)	0.00	(405.00)	(405.00)	0.00	(405.00)	(405.00)	0.00
Billed	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00
Collected	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00
AR Write Off	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00
WIP Balance	9,400.50	9,400.50	0.00						
AR Balance	0.00	0.00	0.00						
Unalloc Payment	0.00								
Client Trust Balance	0.00								

Billing Address

Winkler, Geoff/Receiver for Essex Capital Corporation

Alvarez & Marsal LLC
100 Pine Street, Suite 900
San Francisco, CA 94111-5222
ATTN: Geoff Winkler

Preliminary Billing Form

Billing Atty: 001842 - Joshua Del Castillo

Matter #: 378224-00007

Matter Name: Pending Litigation

Date of Last Billing:

Client Name: Winkler, Geoff/Receiver for Essex Capital Corporation

Proforma Number 1412441

Client/Matter Joint Group # 378224-1

Fees for Matter 378224-00007 (Pending Litigation)

Trans Date	Index	Description of Service Rendered	Timekeeper	Hours	Fees	Sum	Circle Action
01/10/19	7718279	Attention to issues re Garipalli litigation and review documents in connection with same (1.2); correspondence with atty C. Howard (0.1); analysis of pending litigation issues and confer with counsel re same (0.9).	Del Castillo, Joshua	2.2	1,237.50	1,237.50	WO HD TR_____
01/11/19	7719600	Prepare for and teleconference with NY counsel re Essex v. Garipalli matter and prepare update to Receiver re same (1.0).	Del Castillo, Joshua	1.0	562.50	1,800.00	WO HD TR_____
01/14/19	7723359	Analyze pending litigation matters involving Essex (1.5).	Aspis, Norman	1.5	526.50	2,326.50	WO HD TR_____
01/15/19	7723127	Teleconference with atty A. Wong re pending unlawful detainer matter against Essex (0.3).	Del Castillo, Joshua	0.3	168.75	2,495.25	WO HD TR_____
01/17/19	7725490	Review and respond to correspondence re pending litigation and confer re same (0.6); review and execute correspondence to pre-receivership counsel (0.3).	Del Castillo, Joshua	0.9	506.25	3,001.50	WO HD TR_____
01/18/19	7726247	Review and respond to correspondence from counsel in pre-receivership, pending litigation	Del Castillo, Joshua	1.5	843.75	3,845.25	WO HD TR_____

Trans Date	Index	Description of Service Rendered	Timekeeper	Hours	Fees	Sum	Circle	Action
		matters and confer re same (1.0); review materials provided by pre-receivership counsel (0.5).						
01/22/19	7728031	Attention to inquiries from pre-monitorship counsel re pending litigation and confer re necessary filings and notices re same (0.7).	Del Castillo, Joshua	0.7	393.75	4,239.00	WO	HD TR_____
01/24/19	7729953	Review and submit substitution of counsel form for Seed Mackall.	Aspis, Norman	0.3	105.30	4,344.30	WO	HD TR_____
01/28/19	7732900	Attention to pending litigation matters (0.4).	Del Castillo, Joshua	0.4	225.00	4,569.30	WO	HD TR_____
01/29/19	7734835	Attention to pending litigation issues and confer with counsel re status of same (0.9); revise draft notice of pending receivership for filing in pending litigation matters (0.3).	Del Castillo, Joshua	1.2	675.00	5,244.30	WO	HD TR_____
01/30/19	7736879	Attend to and confer with counsel re pressing issues in pending litigation matters (0.7).	Del Castillo, Joshua	0.7	393.75	5,638.05	WO	HD TR_____
01/30/19	7736263	Draft substitution of counsel form for the Gabler v. Essex Capital Corp. et al. matter.	Aspis, Norman	0.5	175.50	5,813.55	WO	HD TR_____
01/30/19	7736267	Draft notice of pending receivership for Sequoia Healthcare Services, LLC v. Essex Capital Corporation, Ralph Iannelli.	Aspis, Norman	0.5	175.50	5,989.05	WO	HD TR_____
01/30/19	7736271	Analyze issues surrounding pending litigation in the SDNY and Second Circuit (.4); correspond with Locke Lord attorney regarding the same (.2).	Aspis, Norman	0.6	210.60	6,199.65	WO	HD TR_____
01/31/19	7737664	Review documents and correspondence and prepare follow-up requests to and teleconferences	Del Castillo, Joshua	2.1	1,181.25	7,380.90	WO	HD TR_____

Trans Date	Index	Description of Service Rendered	Timekeeper	Hours	Fees	Sum	Circle	Action
		with pre-monitorship counsel (2.1).						
01/31/19	7738305	Draft notice of pending receivership in Dennis v. Iannelli et al.	Aspis, Norman	0.5	175.50	7,556.40	WO	HD TR_____
01/31/19	7738358	Review summary of initial conference with Judge Keenan from Locke Lord.	Aspis, Norman	0.3	105.30	7,661.70	WO	HD TR_____
01/31/19	7738397	Review engagement agreement for Lee Gabler matter by and between K. Yopp and Essex (.3); teleconference with K. Yopp regarding the same (.2).	Aspis, Norman	0.5	175.50	7,837.20	WO	HD TR_____
02/01/19	7765740	Draft notice of substitution of counsel in Gabler v. Essex Capital Corp., et al.	Aspis, Norman	0.4	140.40	7,977.60	WO	HD TR_____
02/11/19	7766926	Teleconference with clerk at the Santa Barbara Superior Court regarding a rejected filing (.3); teleconference with counsel for MUFG bank regarding sublease termination agreement (.1).	Aspis, Norman	0.4	140.40	8,118.00	WO	HD TR_____
02/12/19	7766731	Confer with counsel at Locke Lord regarding litigation strategy.	Aspis, Norman	0.2	70.20	8,188.20	WO	HD TR_____
02/15/19	7753893	Review Locke Lord Garipalli litigation budget, confer with counsel re same, and transmit recommendation to Receiver (1.0).	Del Castillo, Joshua	1.0	562.50	8,750.70	WO	HD TR_____
02/15/19	7765657	Review budget produced by Locke Lord and confer with counsel regarding the same (.1); review letter from CVL's counsel (.3).	Aspis, Norman	0.4	140.40	8,891.10	WO	HD TR_____
02/20/19	7756932	Attention to pending, pre-receivership litigation matters (0.5).	Del Castillo, Joshua	0.5	281.25	9,172.35	WO	HD TR_____
02/24/19	7763031	Detailed review of pre-receivership litigation matters and analysis of	Del Castillo, Joshua	2.8	1,575.00	10,747.35	WO	HD TR_____

Trans Date	Index	Description of Service Rendered	Timekeeper	Hours	Fees	Sum	Circle	Action
		issues presented therein (2.5); prepare inquiries to Receiver and counsel re same (0.3).						
02/25/19	7760408	Attention to pending litigation issues and confer with Receiver and pre- receivership counsel re same (0.4).	Del Castillo, Joshua	0.4	225.00	10,972.35	WO	HD TR_____
02/27/19	7763029	Review and respond to correspondence re and attention to pending litigation matters; confer with counsel re demands to pre- receivership counsel (0.9).	Del Castillo, Joshua	0.9	506.25	11,478.60	WO	HD TR_____
02/28/19	7764887	Prepare for and teleconferences and e-mails with Receiver and pre- receivership counsel re pending litigation matters (1.1).	Del Castillo, Joshua	1.1	618.75	12,097.35	WO	HD TR_____
03/01/19	7768153	Attention to pre-receivership litigation matters (0.5).	Del Castillo, Joshua	0.5	281.25	12,378.60	WO	HD TR_____
03/05/19	7770433	Correspondence with atty K. Yopp re Gabler litigation and provide materials to counsel re pending litigation stay (0.6).	Del Castillo, Joshua	0.6	337.50	12,716.10	WO	HD TR_____
03/06/19	7771084	Confer with counsel re upcoming pre- receivership litigation CMCs and attention to pending litigation matters (0.4); teleconferences with pre- receivership counsel (0.9); forward LL Garipalli litigation budget to Receiver with recommendation re same (0.1).	Del Castillo, Joshua	1.4	787.50	13,503.60	WO	HD TR_____
03/06/19	7796589	Review pleadings in Gabler v. Essex Capital Corp. et al. and draft Case Management Statement (.8).	Aspis, Norman	0.8	280.80	13,784.40	WO	HD TR_____
03/07/19	7772859	Review and revise Gabler CMC statement and attachment and confer	Del Castillo, Joshua	0.8	450.00	14,234.40	WO	HD TR_____

Trans Date	Index	Description of Service Rendered	Timekeeper	Hours	Fees	Sum	Circle	Action
		with counsel re same (0.5); e-mails with Iannelli counsel re proposed Gabler stipulation and review draft document in connection with same (0.3).						
03/08/19	7774351	E-mails and teleconferences with counsel and pre-receivership counsel re pending litigation matters (1.5).	Del Castillo, Joshua	1.5	843.75	15,078.15	WO	HD TR_____
03/18/19	7782387	Attention to pre-receivership litigation issues and confer re same (1.0).	Del Castillo, Joshua	1.0	562.50	15,640.65	WO	HD TR_____
03/19/19	7794192	Teleconference regarding Gabler Case Management Conference and transmit substitution of attorney form.	Aspis, Norman	0.3	105.30	15,745.95	WO	HD TR_____
03/24/19	7787476	Review document and correspondence re pending litigation matters (0.6); prepare summary recommendation to counsel re same (0.7).	Del Castillo, Joshua	1.3	731.25	16,477.20	WO	HD TR_____
03/25/19	7794011	Prepare for and attend Case Management Conference in Gabler v. Essex Capital Corp., et. al. (1.1); confer with counsel regarding the same (.2).	Aspis, Norman	1.3	456.30	16,933.50	WO	HD TR_____
03/27/19	7790248	Review and comment on draft case management statement and attachments thereto (0.3).	Del Castillo, Joshua	0.3	168.75	17,102.25	WO	HD TR_____
03/27/19	7793944	Draft Case Management Statement for Dennis v. Iannelli, et. al and submit for filing.	Aspis, Norman	0.4	140.40	17,242.65	WO	HD TR_____
03/27/19	7793948	Teleconference with Akerman LLP regarding Amagansett and confer with counsel regarding the same (.6); confer with counsel regarding Passaic	Aspis, Norman	0.9	315.90	17,558.55	WO	HD TR_____

Trans Date	Index	Description of Service Rendered	Timekeeper	Hours	Fees	Sum	Circle Action
		and Garipalli action in the SDNY (0.3).					
03/28/19	7793800	Teleconference with J. Kramer at Locke Lord regarding litigation matters.	Aspis, Norman	0.3	105.30	17,663.85	WO HD TR_____
03/29/19	7792640	Review case management statements and attention to pending litigation issues (05).	Del Castillo, Joshua	0.5	281.25	17,945.10	WO HD TR_____

Disbursements for Matter 378224-00007 (Pending Litigation)

Trans Date	Index	Type	Quantity	Amt	Circle Action
02/01/19	2512846	Filing Fees - - Nationwide Legal, LLC, SANTA BARBARA SUPERIOR COURTHOUSE, NTC OF PENDING^188913	1.00	35.15	WO HD TR_____
02/08/19	2512847	Filing Fees - - Nationwide Legal, LLC, SANTA BARBARA SUPERIOR COURTHOUSE, SUB OF ATTY^188913	1.00	35.15	WO HD TR_____
02/08/19	2512848	Filing Fees - - Nationwide Legal, LLC, SANTA BARBARA SUPERIOR COURTHOUSE, NTC OF PENDING^188913	1.00	33.95	WO HD TR_____
02/11/19	2512849	Filing Fees - - Nationwide Legal, LLC, SANTA BARBARA SUPERIOR COURTHOUSE, NTC OF RECEIVERSHIP^188913	1.00	35.15	WO HD TR_____
03/25/19	2515309	Telephonic Court Appearance - - CourtCall, LLC, Judge Colleen K. Sterne, Santa Barbara Superior Court-Anacapa Division^9662956	1.00	94.00	WO HD TR_____

Proforma Summary

Timekeeper Number	Timekeeper	Hours	Rate	Amounts
001842	Joshua Del Castillo	25.6	562.50	14,400.00
002369	Norman Aspis	10.1	351.00	3,545.10
		<u>35.7</u>		<u>17,945.10</u>
Total Fees				17,945.10

Total Disbursements

233.40

Attorney Billing Instructions

()	BILL ALL	()	Hold
()	BILL FEES ONLY	()	Write Off
()	BILL COST ONLY	()	Transfer All

Billing Instructions

expires 6/30/2019: 10% off standard rates (automatic)

Account Summary- As Of 03/31/2019

	Fiscal YTD			Calendar YTD			LTD		
	Total	Fees	Disbursement	Total	Fees	Disbursement	Total	Fees	Disbursement
Worked	20,367.35	20,227.95	139.40	20,461.35	20,227.95	233.40	20,461.35	20,227.95	233.40
Unbilled Adj	(70.20)	(70.20)	0.00	(604.35)	(604.35)	0.00	(604.35)	(604.35)	0.00
Billed	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00
Collected	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00
AR Write Off	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00
WIP Balance	19,397.50	19,070.10	327.40						
AR Balance	0.00	0.00	0.00						
Unalloc Payment	0.00								
Client Trust Balance	0.00								

Billing Address

Winkler, Geoff/Receiver for Essex Capital Corporation
 Alvarez & Marsal LLC
 100 Pine Street, Suite 900
 San Francisco, CA 94111-5222
 ATTN: Geoff Winkler



David R. Zaro

PARTNER | LOS ANGELES

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David R. Zaro is a partner in our Los Angeles office, where his practice focuses upon litigation with an emphasis upon creditors' rights, bankruptcy litigation, and state and federal receiverships. David represents a wide range of clients including banks and other institutional lenders, developers, landlords, receivers, examiners, secured and unsecured creditors, and other business enterprises.

David has extensive experience as a bankruptcy lawyer as well as a trial lawyer in federal and state courts in California and several other jurisdictions. His experience in the field of insolvency, creditors' rights, and bankruptcy litigation includes out-of-court workouts and restructurings, federal and state court receiverships, and bankruptcy reorganization proceedings. David also advises residential and commercial lenders and others regarding all aspects of commercial law with regard to commercial and residential mortgage litigation, bank regulatory disputes, and collection actions.

David's representative cases include the representation of Court Appointed Receivers in a \$1.2 billion fraud action brought by the Securities and Exchange Commission in connection with the sale of TIC and other interests in 300 assisted living facilities; and a \$750 million ponzi-like scheme involving the purchase of medical related receivables and related lending transactions; representation of lender in workout of mezzanine financing on a multi-building office park; defense of actions in bankruptcy by junior lienholder and debtor against lender on an industrial park; and structure lease termination and modifications for commercial and retail tenants both in and out of bankruptcy.

David has lectured on matters regarding residential and commercial mortgage litigation and workouts, creditors' rights, construction law, and other real property remedies.

EDUCATION

J.D., University of California, Hastings College of the Law
B.A., Stanford University

SERVICES

Litigation
Restructuring, Insolvency & Bankruptcy
Construction Law
Receiverships, Lenders & Special Creditor Remedies

INDUSTRIES

Financial Services
Construction

MEMBERSHIPS

- Financial Lawyers Conference
- American Bankruptcy Institute
- Turnaround Management Association

ACCOLADES

- Awarded Turnaround Management Association's Transaction of the Year- Large Turnaround Award (2011)

BAR ADMISSIONS

- California

COURT ADMISSIONS

- U.S. District Court, Central District of California
- U.S. District Court, Northern District of California
- U.S. District Court, Eastern District of California
- U.S. District Court, Southern District of California
- U.S. District Court, District of Arizona
- California Supreme Court
- U.S. Court of Appeals for the Ninth Circuit
- U.S. Supreme Court

Matters

Residential and Commercial Bank. Represented bank in achieving a favorable published decision by the Ninth Circuit in Chapter 12 bankruptcy case. The appeal involved an attempt by a debtor in bankruptcy, and self-described family farmer, to leverage a discharge of personal debt in a prior Chapter 7 bankruptcy case into subsequent eligibility under Chapter 12 of the Bankruptcy Code, which could have enabled her to avoid foreclosure or strip down the value of the bank's security in the subject property. The Ninth Circuit did not agree with the debtor. The debtor sought an en banc review of the Ninth Circuit's decision which was subsequently denied.

SEC Receiver. Representing SEC Receiver in securities fraud case in connection with the raising of \$120 million via the EB-5 program for the development of two large real estate developments in Seattle and neighboring Everett. We are prosecuting claims to recover investor funds from third-party borrower.

Residential and Commercial Bank. Represented a residential and commercial bank in defending several thousand lawsuits throughout California, and managed local counsel in 20 other states. The lawsuits concern allegations of mortgage fraud, wrongful foreclosure, violations of TILA, RESPA, HOSPA, and other statutory and regulatory issues.

SEC Receiver. Represented SEC Receiver in securities fraud case involving losses to investors of over \$40 million.

Residential and Commercial Lender. Represented a residential and commercial lender in the workout and collection of a portfolio of commercial loans exceeding \$1 billion.

Residential and Commercial Lender. Represented a residential and commercial lender as to the workout and collections of a portfolio of construction loans, some loans involving completed projects as well as those in progress.



Joshua A. del Castillo
PARTNER | LOS ANGELES

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Joshua A. del Castillo is a litigation, creditors' rights, and regulatory compliance attorney practicing in the Firm's Receiverships, Lenders & Special Creditor Remedies; Restructuring, Insolvency & Bankruptcy; and Corporate Finance practice groups. Joshua's practice includes general business litigation, receiverships and bankruptcy, and regulatory compliance. Joshua represents a range of clients including banks and other institutional lenders, receivers, monitors, secured and unsecured creditors, developers, and other business enterprises.

EDUCATION

J.D., USC Gould School of Law
M.A., University of Michigan
B.A., *cum laude*, University of Southern California

SERVICES

Restructuring, Insolvency & Bankruptcy
Litigation & Counseling
Receiverships, Lenders & Special Creditor Remedies
Commercial Finance

INDUSTRIES

Financial Services
Residential & Multifamily

Joshua regularly serves as general litigation counsel for institutional lenders and administrators of securitized trusts throughout the state and federal court systems in California, including in connection with contract matters, actions challenging the enforceability of security instruments, and actions alleging regulatory violations for which private remedies exist. He also frequently represents creditors in related bankruptcy proceedings and oversees local counsel in creditor matters nationwide.

Joshua also serves as counsel for court-appointed permanent receivers in enforcement actions brought by the Securities and Exchange Commission, Federal Trade Commission, and other federal agencies. Joshua's receiver clients are regularly tasked with taking over the entities used to perpetrate a fraud or other unlawful conduct, conducting necessary forensic accountings, documenting (for the benefit of the appointing court) the unlawful conduct itself, and recovering available proceeds for distribution, where possible. Joshua also maintains an active real property receivership practice, advising lender and receiver clients on the propriety of a receivership for a given circumstance and on the management and disposition of receivership estate property. In this context, Joshua has secured the appointment of receivers in hotly contested real property disputes and assisted real property receivers with the administration and sale of environmentally compromised and other unusual commercial properties.

Joshua further maintains a growing regulatory compliance practice, with a focus on federal and state financial services regulations. Joshua has successfully represented lenders and other business enterprises in litigation alleging regulatory violations, as well as provided regulatory compliance and analysis advice to lenders, investment and telecommunications companies, public interest organizations, and others.

An advocate for social and economic justice, Joshua sits on the board of the Wage Justice Center, a public-interest organization that collaborates with community groups, workers' centers and legal services providers to advance low-income workers' rights, educate workers, and advocate for the collection of unpaid wages. He has also served as a *pro bono* law clerk for the ACLU of Southern California, and *pro bono* counsel to Public Counsel, one of the nation's largest public interest law firms.

Joshua has represented clients before state and federal courts throughout California, including the California Court of Appeal, the United States Bankruptcy Appellate Panel of the Ninth Circuit, and the Ninth Circuit Court of Appeals.

MEMBERSHIPS

- Financial Lawyers Conference
- California Receivers Forum
- Hispanic National Bar Association
- National Association of Federal Equity Receivers

ACCOLADES

- *Pro Bono Award*, Wage Justice Center, 2009
- Selected for inclusion in *Super Lawyers' Southern California Rising Stars* (2012 - 2015)

BAR ADMISSIONS

- California

COURT ADMISSIONS

- All California state courts
- U.S. District Court, Northern District of California (including Bankruptcy Court)
- U.S. District Court, Eastern District of California (including Bankruptcy Court)
- U.S. District Court, Central District of California (including Bankruptcy Court)
- U.S. District Court, Southern District of California (including Bankruptcy Court)
- U.S. Court of Appeals for the Ninth Circuit
- Bankruptcy Appellate Panel of the Ninth Circuit
- Supreme Court of the United States

Matters

LITIGATION AND BANKRUPTCY

Commercial Lenders. Represented a national, commercial lender in connection with a large bankruptcy and breach of contract dispute, in both state and federal courts.

Developers. Represented national developers in connection with preferential transfer claims brought by bankruptcy trustees.

Law Firms. Represented a national law firm in connection with the bankruptcy of a large client.

Mortgage Lenders. Represented a number of the nation's largest mortgage lenders in multiple commercial litigation matters, in both state and federal courts, including courts of appeal.

Non-Profit Organizations. Provided *pro bono* assistance to a non-profit organization representing indigent and low-income workers in employment disputes.

FEDERAL EQUITY RECEIVERSHIPS

Securities and Exchange Commission v. Plus Money, Inc., et al., (U.S. District Court, Southern District of California). Represented a receiver appointed in a Securities and Exchange Commission enforcement action alleging a \$45 million Ponzi-like investment scheme based on purported covered-call option trading. Receiver marshaled assets and distributed funds to defrauded investors.

Securities and Exchange Commission v. Pacheco, et al., (U.S. District Court, Southern District of California). Represented a receiver appointed in a Securities and Exchange Commission enforcement action alleging a \$15 million Ponzi-like investment scheme based on purported covered-call option trading. Receiver marshaled assets and distributed funds to defrauded investors.

Securities and Exchange Commission v. Medical Capital Holding, et al., (U.S. District Court, Central District of California). Represented a receiver appointed in a Securities and Exchange Commission enforcement action alleging a Ponzi-like investment scheme which raised over \$1 billion, ostensibly to purchase medical receivables.

Securities and Exchange Commission v. Global Online Direct, Inc., et al., (U.S. District Court, Northern District of Georgia). Represented a receiver appointed in a Securities and Exchange Commission enforcement action alleging that the defendant entities raised over \$45 million through the sale of unregistered securities.

Securities and Exchange Commission v. Trabulse, et al., (U.S. District Court, Northern District of California). Represented a receiver appointed to monitor a hedge fund, at the request of the Securities and Exchange Commission.

Federal Trade Commission v. Consumer Advocates Group, LLC, et al., (U.S. District Court, Southern District of California). Represented a receiver appointed at the request of the Federal Trade Commission in connection with an enforcement action alleging deceptive and fraudulent mortgage modification practices.

REAL PROPERTY RECEIVERSHIPS

Wachovia Bank, NA v. Downtown Sunnyvale Residential, LLC, et al., (Superior Court of California, County of Santa Clara). Represented a real property receiver appointed over a large-scale commercial development in connection with successfully securing trial court approval of the receiver's administration and improvement of the development, as well as approval of the receiver's compensation and discharge request.

First Citizens Bank & Trust Co. v. NDustrial Drive LLC, et al., (Superior Court of California, County of San Joaquin). Represented a real property receiver appointed to administer receivership estate substantially comprised of abandoned recycling facility. Assisted receiver with site clean-up, marketing, and sale efforts.

Hana Small Business Lending, Inc. v. Rock Petroleum, Inc., et al., (Superior Court of California, County of Riverside). Represented a real property receiver appointed to administer, and ultimately sell, receivership estate comprised of multiple service stations, convenience stores, and attendant contracts and permits.

Excel National Bank v. Tolosa Sison Family Corp., et al., (Superior Court of California, County of San Mateo). Represented a real property receiver appointed to administer receivership estate substantially comprised of service station and convenience store assets.

REGULATORY COMPLIANCE

Real Property Brokerage. Represented one of the Southwest's largest real property brokerages in connection with litigation alleging a violation of federal consumer protection statutes.

Lenders and Institutional Investors. Represented lender in connection with litigation alleging systematic violations of the Fair Credit Reporting Act. Represented national institutional investor in connection with revision of internal policies and procedures for compliance with new or revised consumer protection statutes. Represented lender in connection with action implicating Bank Secrecy Act and Gramm-Leach-Bliley-Act matters.

Telecommunications Business. Represented cell tower leasing entity in connection with policies and procedures for compliance with new or revised consumer protection statutes.

Public Interest Organizations. Provided analysis of applicability of provisions of Dodd-Frank Act to highly publicized business practices of so-called buy-here / pay-here automobile dealerships.



Norman M. Aspis
ASSOCIATE | LOS ANGELES

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Norman helps clients maximize their goals and objectives in litigation related to creditors' rights, bankruptcy, and state and federal receiverships. He is a valued team member who provides a high level of attention to detail, sound judgment, and responsive service.

Working alongside Allen Matkins litigation partners, Norman is known for his ability to flesh out creative angles and craft persuasive arguments to win in a broad array of proceedings both inside and outside the courtroom.

Prior to joining Allen Matkins, Norman was an associate in the commercial litigation department at Dentons US LLP. There, he worked on litigation matters involving government contracts law, international trade regulations, insurance coverage, employment disputes, and environmental issues. He is a former intern at the United States Attorney's Office for the Central District of California, the District of Massachusetts, and the House of Commons of the United Kingdom.

BAR ADMISSIONS

- California

EDUCATION

J.D., University of Virginia School of Law
B.S., *summa cum laude*, Northeastern University

SERVICES

Litigation & Counseling
Receiverships, Lenders & Special Creditor Remedies
Restructuring, Insolvency & Bankruptcy

PROOF OF SERVICE

Securities and Exchange Commission v. Ralph T. Iannelli and Essex Capital Corporation
USDC, Central District of California – Case No. 2:18-cv-05008-FMO-AFM

I am employed in the County of Los Angeles, State of California. I am over the age of 18 and not a party to the within action. My business address is 865 S. Figueroa Street, Suite 2800, Los Angeles, California 90017-2543.

On **April 30, 2019**, I caused to be served the document entitled: **FIRST INTERIM APPLICATION OF RECEIVER, GEOFF WINKLER, AND ALLEN MATKINS LECK GAMBLE MALLORY & NATSIS LLP, GENERAL COUNSEL TO THE RECEIVER, FOR PAYMENT OF FEES AND REIMBURSEMENT OF EXPENSES** on all the parties to this action addressed as stated on the attached service list.

OFFICE MAIL: By placing in sealed envelope(s), which I placed for collection and mailing today following ordinary business practices. I am readily familiar with the firm's practice for collection and processing of correspondence for mailing; such correspondence would be deposited with the U.S. Postal Service on the same day in the ordinary course of business.

OVERNIGHT DELIVERY: I deposited in a box or other facility regularly maintained by express service carrier, or delivered to a courier or driver authorized by said express service carrier to receive documents, a true copy of the foregoing document(s) in sealed envelope(s) or package(s) designed by the express service carrier, addressed as indicated on the attached service list, with fees for overnight delivery paid or provided for.

HAND DELIVERY: I caused to be hand delivered each such envelope to the office of the addressee as stated on the attached service list.

ELECTRONIC MAIL: By transmitting the document by electronic mail to the electronic mail address as stated on the attached service list.

E-FILING: By causing the document to be electronically filed via the Court's CM/ECF system, which effects electronic service on counsel who are registered with the CM/ECF system.

FAX: By transmitting the document by facsimile transmission. The transmission was reported as complete and without error.

I declare that I am employed in the office of a member of the Bar of this Court at whose direction the service was made. I declare under penalty of perjury under the laws of the United States of America that the foregoing is true and correct. Executed on **April 30, 2019** at Los Angeles, California.

/s/ Martha Diaz
Martha Diaz

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SERVICE LIST

Securities and Exchange Commission v. Ralph T. Iannelli and Essex Capital Corporation
USDC, Central District of California – Case No. 2:18-cv-05008-FMO-AFM

Mark Riera, Esq.
Jeffer Mangels Butler & Mitchell LLP
1900 Avenue of the Stars, 7th Floor
Los Angeles, CA 90067-4308

Via First Class Mail