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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

THIRD INTERIM APPLICATION OF
RECEIVER, GEOFF WINKLER, AND
HIS PROFESSIONALS FOR
PAYMENT OF FEES AND
REIMBURSEMENT OF EXPENSES
[July 1, 2019 - September 30, 2019]

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

Date: February 6, 2020
Time: 10:00 a.m.
Ctrm: 6D
Judge Hon. Fernando M. Olguin

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1 **I. INTRODUCTION.**

2 Geoff Winkler (the "Receiver"), the Court-appointed permanent receiver for
 3 Defendant Essex Capital Corporation ("Essex") and its subsidiaries and affiliates
 4 (collectively, the "Receivership Entities" or "Entities"), along with his counsel of
 5 record, Allen Matkins Leck Gamble Mallory & Natsis LLP ("Allen Matkins"), his
 6 initial special litigation counsel for the action styled Essex Capital Corp. v.
 7 Garipalli, et al., S.D.N.Y. Case No. 17-cv-06347 (the "Garipalli Action"), Locke
 8 Lord LLP ("Locke Lord"), and his current special litigation counsel for the Garipalli
 9 Action, the Teitelbaum Law Group, LLC ("Teitelbaum") (Allen Matkins, Locke
 10 Lord, and Teitelbaum are collectively referred to herein as the "Professionals")
 11 hereby submit this Third Interim Application for Payment of Fees and
 12 Reimbursement of Expenses (the "Application"). This Application is the third
 13 interim application for payment of fees and reimbursement of expenses submitted
 14 by the Receiver and his Professionals, and covers the period from July 1, 2019
 15 through September 30, 2019 (the "Application Period").

16 Pursuant to the Application, the Receiver and his Professionals seek approval
 17 of 100% of their fees and expenses incurred during the Application Period. The
 18 Receiver, Allen Matkins, and Teitelbaum seek payment, on an interim basis, of 80%
 19 of their fees and 100% of their expenses for the Application Period. Given that
 20 Locke Lord's services in connection with the Garipalli Action, and its involvement
 21 in the instant receivership, have concluded, Locke Lord seeks payment, on a full and
 22 final basis, of 100% of its fees and expenses incurred during the course of the instant
 23 receivership. The chart below indicates the requests of the Receiver and his
 24 Professionals by way of this Application:

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<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	\$151,808.70	\$1,705.42	\$121,446.96	\$1,705.42
Allen Matkins	\$157,623.30	\$707.27	\$126,098.64	\$707.27

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1	Locke Lord	\$82,844.23	\$794.79	<u>Final Payment</u>	<u>Final Payment</u>
2				<u>Requested:</u>	<u>Requested:</u>
3	Teitelbaum	\$1,900.00	\$0	\$82,844.23	\$794.79
4	TOTAL:	\$394,176.23	\$3,207.48	\$1,520.00	\$0
				\$331,909.83	\$3,207.48

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

10 **II. GENERAL SUMMARY.**

11 As reflected in the Receiver's recently-submitted Third Interim Report and
 12 Petition for Further Instructions (the "Third Interim Report") (ECF No. 123), during
 13 the Application Period, and with assistance from his Professionals, the Receiver
 14 made substantial progress in satisfaction of his duties, as determined by the Court's
 15 December 21, 2018 Order Regarding Preliminary Injunction and Appointment of a
 16 Permanent Receiver (the "Appointment Order") (ECF No. 66), and its September 9,
 17 2019 Order Regarding Permanent Injunction (the "Permanent Injunction") (ECF
 18 No. 113). Among other things, the Receiver: (1) continued his analysis of the
 19 business and financial activities of the Receivership Entities, including in
 20 connection with his efforts to identify and marshal their assets ("Receivership
 21 Assets" or "Assets"); (2) continued to execute his plan for recovering and
 22 maximizing the value of available Receivership Assets, including via the execution
 23 of active lease buyouts upon their termination; and (3) continued his review and
 24 further developed his analysis of prospective claims against third parties, including
 25 prospective disgorgement claims against parties believed to be in wrongful
 26 possession of Receivership Assets.

27 A more detailed description of the work performed by the Receiver and his
 28 Professionals during the Application Period appears below, and in the Third Interim

1 Report. Given the amount and nature of the work completed by the Receiver and
2 his Professionals during the Application Period, they respectfully submit that the
3 fees and expenses incurred during the Application Period are appropriate, and
4 should be approved, and paid on interim and final bases, as indicated above. As an
5 accommodation to the receivership estate (the "Estate"), and consistent with the
6 Commission's billing guidelines and ordinary practice in federal receiverships, the
7 Receiver, Allen Matkins, and Teitelbaum request that the Court approve 100% of
8 their fees and expenses incurred during the Application Period, but authorize
9 payment, on an interim basis, of only 80% of their fees, but 100% of their expenses,
10 at this time. Locke Lord respectfully requests that the Court approve and pay 100%
11 of its fees and expenses incurred during the course of the instant receivership,
12 because its engagement in connection with the Garipalli Action has concluded.

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

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

- 17 • The Commission's Complaint, filed on June 5, 2018 (ECF No. 1);
- 18 • The Appointment Order, entered on December 21, 2018 (ECF No. 66);
- 19 • Motion for Order in Aid of Receivership, filed on January 9, 2019
20 (ECF No. 67 and 67-1);
- 21 • Order in Aid of Receivership ("Order in Aid"), entered on February 1,
22 2019 (ECF No. 69);
- 23 • Mediation Report, filed on April 5, 2019 (ECF No. 74);
- 24 • First Interim Report and Petition for Further Instructions of Receiver,
25 Geoff Winker ("First Interim Report"), filed on April 30, 2019 (ECF
26 No. 78);

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

- 1 • Consent of Defendant Ralph T. Iannelli, filed on May 30, 2019 (ECF
- 2 No. 90);
- 3 • Final Judgment as to Defendant Ralph T. Iannelli, entered on June 5,
- 4 2019 (ECF No. 93);
- 5 • Abstract of Judgment Regarding Disgorgement, entered on June 20,
- 6 2019 (ECF No. 94);
- 7 • Abstract of Judgment Regarding Civil Penalty, entered on June 20,
- 8 2019 (ECF No. 95);
- 9 • Order On First Interim Report, entered on July 26, 2019 (ECF No. 97);
- 10 • Judgment against Defendant Essex Capital Corporation, entered on
- 11 September 9, 2019 (ECF No. 110);
- 12 • Second Interim Report and Petition for Further Instructions of
- 13 Receiver, Geoff Winker ("Second Interim Report"), filed on August 14,
- 14 2019 (ECF No. 103);
- 15 • Permanent Injunction, entered on September 9, 2019 (ECF No. 113);
- 16 and
- 17 • Third Interim Report, filed on November 18, 2019 (ECF No. 123).

18 **IV. SERVICES PERFORMED BY THE RECEIVER DURING THE**
 19 **APPLICATION PERIOD.**

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

<u>Receiver's Category</u>	<u>Hours Worked</u>	<u>Receiver's Fees</u>
Financial – Accounting/Auditing	111.2	\$22,452.60
Financial – Business Analysis	2.7	\$753.30
Financial – Corporate Finance	8.1	\$2,259.90
Financial – Data Analysis	23.8	\$6,640.20
Financial – Forensic Accounting	204.7	\$57,111.30

1	Legal – Asset Disposition	0.8	\$223.20
2	Legal – Business Operations	33.0	\$9,207.00
3	Legal – Case Administration	178.8	\$53,161.20
4	TOTAL:	563.1	\$151,808.70

4 During the Application Period, and as reflected in the Receiver's Third
5 Interim Report, the Receiver and his staff undertook substantial efforts to analyze
6 the business and financial activities of the Receivership Entities, investigate and
7 recover Receivership Assets, analyze prospective claims against third parties, and
8 otherwise administer the Estate of the Receivership Entities. Specifically, the
9 services performed by the Receiver during the Application Period are described
10 below, by category, and in more detail in the Receiver's invoices, which are attached
11 hereto as **Exhibit A**.

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

13 During the Application Period, the Receiver devoted a relatively significant
14 amount of time and effort to work in this category, which involved conducting the
15 necessary accounting and auditing to identify and categorize investors and other
16 creditors in anticipation of a Court-approved claims process. Efforts devoted within
17 this category during the Application Period will likely expedite and streamline the
18 claims process, because the Receiver has worked to identify—and continues to do
19 so—the amounts outstanding and owed by the Receivership Entities to an
20 overwhelming majority of their investors and creditors. To that end, the Receiver
21 has conducted an extensive money-in/money-out, or netting, analysis for the
22 investors in and creditors of the Receivership Entities. Accordingly, the Receiver
23 anticipates transmitting a claims summary to each known investor and creditor,
24 identifying his estimated amount of each investor's or creditor's claim.

25 Moreover, the work performed within this category has included the
26 refinement, and further development of, the Receiver's analysis of prospective
27 disgorgement claims against parties believed to be in wrongful possession of
28 Receivership Assets. On the basis of the Receiver's thorough netting analysis for

1 the investors in the Receivership Entities, the Receiver has identified fifteen (15)
2 individuals who will be the focus of initial disgorgement efforts. In the aggregate,
3 those fifteen (15) individuals appear to have received profits in excess of
4 \$23 million, and individual net winnings of at least \$500,000.

5 **B. Financial – Business Analysis.**

6 During the Application Period, the Receiver devoted a relatively minor
7 amount of time to work within this category, which involved analyzing the
8 Receivership Entities' business operations in order to manage them as a going
9 concern, and in anticipation of handling expiring leases. To that end, the Receiver,
10 principally, devoted time within this category to reviewing soon-to-be expired leases
11 and warrant option contracts, in order to develop a strategy for handling such leases
12 and contracts.

13 **C. Financial – Corporate Finance.**

14 During the Application Period, the Receiver's work within the Financial –
15 Corporate Finance category was primarily devoted to arranging buyouts of a number
16 of leased Assets at the termination of those leases. In connection therewith, the
17 Receiver corresponded with Allen Matkins and Montecito Bank & Trust ("MBT")
18 in order to address residual buyout and lease payment issues.

19 **D. Financial – Data Analysis.**

20 During the Application Period, the Receiver devoted a relatively minor
21 amount of time to work within the Financial – Data Analysis category. Work within
22 this category included compiling and reviewing the underlying data for the
23 Receiver's extensive money-in/money-out, or netting, analysis for the investors in
24 and creditors of the Receivership Entities. Based upon the Receiver's diligent intake
25 and review of data in connection with his money-in/money-out analysis, and his
26 matching of investors with particular transactions, the Receiver believes he will be
27 able to identify the amounts outstanding and owed by the Entities to most of their
28 investors and creditors.

1 **E. Financial – Forensic Accounting.**

2 The Receiver and his staff spent a considerable amount of time devoted to a
3 rigorous forensic accounting of the Receivership Entities during the Application
4 Period. To that end, the Receiver refined his preliminary, yet comprehensive,
5 accounting of the Receivership Entities, by focusing on those transactions:
6 (1) believed to relate to recoverable Assets; and (2) believed to reflect funds raised
7 from and paid out to investors in, and other creditors of, the Receivership Entities.
8 In doing so, the Receiver created a standardized transaction list for both bank and
9 brokerage transactions, including a full catalog of account deposits and wires.
10 Moreover, the Receiver and his staff updated the inventory of know Receivership
11 Assets, including cash on-hand, investments, receivables (including revenue from
12 pending equipment leases), and known claims against third parties, including claims
13 on outstanding notes owed to Essex.

14 The Receiver's comprehensive accounting efforts have enabled him to
15 develop a thorough understanding of the Receivership Entities' financial and
16 business activities which, in turn, has empowered him to readily identify and
17 commence marshaling their Assets for the benefit of the Entities, their investors, and
18 other creditors. The Receiver expects, based upon his detailed forensic accounting,
19 that his initial disgorgement efforts will focus on fifteen (15) investors who, in the
20 aggregate, appear to have received profits in excess of \$23 million, and whose
21 individual net winnings are at least \$500,000. The Receiver expects to petition the
22 Court for authority to pursue disgorgement claims by way of separate motion within
23 ninety (90) days of the submission of the Third Interim Report. Ultimately, the
24 Receiver's substantial forensic accounting efforts will yield significant benefits to
25 the Estate of the Receivership Entities by reducing the Receiver's costs in
26 connection with the instant receivership on a number of his future efforts.

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1 **F. Legal – Asset Disposition.**

2 During the Application Period, the Receiver spent a limited amount of time
3 analyzing certain transactions in connection with a particular lease.

4 **G. Legal – Business Operations.**

5 The Receiver and his staff expended a limited amount of time to work within
6 this category to address legal-related business issues in connection with active leases
7 and the buyout of leased Assets at the termination of certain leases.

8 **H. Legal – Case Administration.**

9 During the Application Period, the Receiver communicated extensively with
10 Allen Matkins regarding his administration of the Receivership Entities and their
11 Estate, along with the legal work required to enable the Receiver to undertake those
12 efforts he deemed necessary, with particular attention to efforts regarding the
13 marshalling and recovery of Receivership Assets. To that end, the Receiver
14 conferred with Allen Matkins extensively regarding strategies for marshalling and
15 recovering Receivership Assets including, but not limited to, 915 Elm Avenue CVL,
16 LLC ("CVL"). The Receiver also communicated with Allen Matkins regarding
17 issues in connection with certain document productions from financial institutions in
18 response to subpoenas and document requests. Work within this category also
19 included settlement efforts and related work in connection with the Garipalli Action.

20 This category of work also encompassed the Receiver's work on the Second
21 Interim Report, which involved preparing and compiling the exhibits thereto, in
22 order to keep this Court apprised of the status of the instant receivership and all
23 material developments in connection therewith.

24 **V. SERVICES PERFORMED BY ALLEN MATKINS DURING THE**
25 **APPLICATION PERIOD.**

26 Allen Matkins was engaged by the Receiver on January 2, 2019 and the Court
27 approved its engagement as lead receivership counsel on February 1, 2019 (see ECF
28 No. 69). The Receiver selected Allen Matkins as his general receivership counsel

1 because of the firm's extensive expertise in federal equity receivership matters, as
2 well as creditors' rights and litigation matters. Allen Matkins has served as counsel
3 to federal equity receivers in dozens of cases, has represented a variety of entities in
4 numerous bankruptcy matters, and has significant substantive experience in related
5 areas such as corporate and securities laws, real estate, and other matters.

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

11 Detailed descriptions of the services rendered by Allen Matkins are contained
12 in **Exhibit B**, attached hereto. Biographical information of the Allen Matkins
13 attorneys who rendered significant services during the Application Period is
14 attached hereto as **Exhibit C**. During the Application Period, Allen Matkins
15 recorded its time in the following categories²:

- 16 1. General Receivership;
- 17 2. Asset Recovery & Management;
- 18 3. Investigation/Reporting;
- 19 4. Sale/Disposition/Transfer of Assets;
- 20 5. Pending Litigation; and
- 21 6. Claims/Distribution.

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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 **A. General Receivership.**

2 Services in the "General Receivership" category relate to assisting the
3 Receiver in the administration of the receivership Estate. During the Application
4 Period, Allen Matkins attorneys addressed general case administration issues
5 including, but not limited to, reviewing the Permanent Injunction, and preparing for
6 and participating in the August 22, 2019 status conference, whereby Allen Matkins,
7 in conjunction with the Commission, apprised the Court of the status of the instant
8 receivership and all material developments in connection therewith. Significant
9 time within this category was devoted to reviewing the Notice of Motion and
10 Motion to Intervene and to Remove CVL's Assets from the Court-Ordered Freeze
11 (the "CVL Intervention Motion") (ECF No. 115), and preparing the Receiver's
12 opposition to the CVL Intervention Motion.

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

15

<u>Name</u>	<u>Title</u>	<u>Hourly Rate</u>	<u>Hours</u>	<u>Fees</u>
D. Zaro	Partner	\$787.50	2.8	\$2,205.00
J. del Castillo	Partner	\$594.00	38	\$22,572.00
N. Aspis	Associate	\$405.00	1.7	\$688.50
G. Lopez	Paralegal	\$292.50	0.3	\$87.75
TOTAL:			42.8	\$25,553.25
Total Expenses:				\$113.53

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21 **B. Asset Recovery & Management.**

22 Services in the "Asset Recovery & Management" category relate directly to
23 the Receiver's efforts to identify, secure, preserve, and recover Receivership Assets.
24 During the Application Period, Allen Matkins devoted a considerable amount of
25 time in connection with these efforts, with a particular focus on the following
26 Assets:

- 27 • CVL: During the Application Period, Allen Matkins attorneys
28 provided significant assistance to the Receiver in connection with his demand

1 to Mr. Iannelli, in accordance with the turnover provisions of the
2 Appointment Order, that he assign his interest in CVL to the Receivership
3 Entities. To that end, Allen Matkins reviewed relevant records related to the
4 formation of CVL, developed a recovery plan for Mr. Iannelli's interest,
5 conferred with CVL's and Mr. Iannelli's respective counsel regarding Mr.
6 Iannelli's interest and certain foundational promissory notes to CVL. Allen
7 Matkins also reviewed the underlying transaction records in connection with
8 Mr. Iannelli's transfers to CVL and, with the Receiver, confirmed that CVL is
9 a Receivership Asset.

10 • Amagansett: Allen Matkins attorneys also spent substantial time,
11 during the Application Period, assisting the Receiver in his analysis of
12 Amagansett Partners LLC ("Amagansett"). In connection therewith, Allen
13 Matkins attorneys reviewed all known transactions involving Amagansett in
14 an effort to, among other things, develop a valuation of the underlying illiquid
15 securities therein and propose a recovery plan. Allen Matkins attorneys have
16 also been in regular contact with counsel for the individual investor in
17 Amagansett.

18 • Receivership Entity Leases: Allen Matkins attorneys also assisted the
19 Receiver, during the Application Period, in arranging certain buyouts of
20 leased Assets at the termination of those leases, and attended to certain lease
21 revenue administration issues relating to active equipment leases that the
22 Receiver continues to administer as a going concern.

23 • Claims Against Pre-Receivership Professionals: Allen Matkins also
24 devoted time during the Application Period to reviewing potential claims
25 against pre-receivership professionals and developing strategies for pursuing
26 such claims.

27 In addition to the aforementioned Receivership Assets, during the Application
28 Period, Allen Matkins also: (1) analyzed issues concerning the recovery of

1 Mr. Iannelli's other personal property interests apparently paid for with receivership
2 funds; (2) worked with the Receiver to refine his comprehensive plan for identifying
3 and pursuing disgorgement targets; and (3) coordinated with MBT to ensure that its
4 administrative processes for loan servicing remain consistent with the fiduciary
5 nature of the Receiver's appointment.

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

<u>Name</u>	<u>Title</u>	<u>Hourly Rate</u>	<u>Hours</u>	<u>Fees</u>
D. Zaro	Partner	\$787.50	25.1	\$19,766.25
J. del Castillo	Partner	\$594.00	55.7	\$33,085.80
A. Engstrom	Associate	\$405.00	16.6	\$6,723.00
N. Aspis	Associate	\$405.00	4.2	\$1,701.00
TOTAL:			101.6	\$61,276.05
Total Expenses:				\$0.00

14 **C. Investigation / Reporting.**

15 Services in the "Investigation / Reporting" category relate to the Receiver's
16 efforts to investigate the nature and location of Receivership Assets, along with the
17 business and financial activities of the Receivership Entities, and his preparation of
18 reports to the Court.

19 During the Application Period, Allen Matkins provided significant assistance
20 to the Receiver in connection with the identification, recovery, and review of
21 documents relating to the Receivership Entities and their business and financial
22 activities, and with the compilation and presentation of conclusions derived
23 therefrom to the Court, in the form of the Second Interim Report. This effort was
24 comprised of, in part, continuing to execute on the Receiver's investigation and
25 discovery plan, preparing and following up on subpoenas and document requests to
26 target entities, and communicating with representatives of recipients of the
27 Receiver's subpoenas and document requests.

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1 Additionally, these efforts focused on reviewing global, yet preliminary,
 2 accounting data in order to assist the Receiver in his investigation of prospective
 3 claimants and disgorgement targets. During the Application Period, Allen Matkins
 4 also prepared the Second Interim Report.

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

<u>Name</u>	<u>Title</u>	<u>Hourly Rate</u>	<u>Hours</u>	<u>Fees</u>
D. Zaro	Partner	\$787.50	14.3	\$11,261.25
J. del Castillo	Partner	\$594.00	43.6	\$25,898.40
N. Aspis	Associate	\$405.00	19.1	\$7,735.50
TOTAL:			77.0	\$44,895.15
Total Expenses:				\$51.00

12 **D. Sale/Disposition/Transfer of Assets.**

13 Services in the "Sale/Disposition/Transfer of Assets" category relate to the
 14 Receiver's efforts to dispose of Receivership Assets in order to generate returns for
 15 the benefit of the Receivership Entities, and their investors and creditors.

16 During the Application Period, Allen Matkins devoted a limited amount of
 17 time to asset sale and disposition issues, particularly in connection with equipment
 18 under a particular lease.

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

<u>Name</u>	<u>Title</u>	<u>Hourly Rate</u>	<u>Hours</u>	<u>Fees</u>
J. del Castillo	Partner	\$594.00	3.6	\$2,138.40
TOTAL:			3.6	\$2,138.40
Total Expenses:				\$0.00

25 **E. Pending Litigation.**

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

5 During the Application Period, Allen Matkins assisted the Receiver in his
6 continued prosecution and efforts to secure an appropriate settlement of the
7 Garipalli Action. These efforts included conferring with the Receiver's original
8 special litigation counsel for the matter, Locke Lord, regarding written discovery
9 strategy, depositions of certain defendant individuals in the Garipalli Action, and
10 informal settlement discussions. Having further discussed potential litigation fees
11 and expenses with Locke Lord, the Receiver determined it would be appropriate to
12 engage new special litigation counsel for the litigation and to pursue dedicated
13 settlement discussions. To that end, the Receiver, with the assistance of Allen
14 Matkins, decided to replace Locke Lord as special litigation counsel with
15 Teitelbaum, whom the Receiver concluded, in his reasonable business judgment,
16 had the requisite experience to secure an appropriate settlement of the claims alleged
17 in the Garipalli Action, on financial terms appropriately aligned with the nature of
18 the receivership. During the Application Period, Allen Matkins facilitated this
19 transition including, but not limited to, the transfer of client files from Locke Lord to
20 Teitelbaum and providing Teitelbaum with a detailed analysis of the claims and the
21 Receiver's strategy regarding the Garipalli Action.

22 Allen Matkins also devoted a limited amount of time to preparing a case
23 management statement and attending a case management conference in a pre-
24 receivership action pending in the Superior Court of California, County of Santa
25 Barbara, during the Application Period.

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

<u>Name</u>	<u>Title</u>	<u>Hourly Rate</u>	<u>Hours</u>	<u>Fees</u>
D. Zaro	Partner	\$787.50	0.3	\$236.25
J. del Castillo	Partner	\$594.00	23.8	\$14,137.20
N. Aspis	Associate	\$405.00	5.9	\$2,389.50
TOTAL:			30.0	\$16,762.95
Total Expenses:				\$542.74

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8 **F. Claims/Distribution.**

9 Services in the "Claims/Distribution" category relate to the Receiver's efforts
10 to identify and analyze claims, and the Receiver's eventual distribution efforts.
11 During the Application Period, Allen Matkins devoted a limited amount of time to
12 certain claim issues in connection with Amagansett, CVL, and certain individual
13 investors, as well as assisting the Receiver in connection with preliminary plans for
14 his anticipated distribution pursuant to an eventual Court-approved claims process.

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

<u>Name</u>	<u>Title</u>	<u>Hourly Rate</u>	<u>Hours</u>	<u>Fees</u>
D. Zaro	Partner	\$787.50	7.0	\$5,512.50
J. del Castillo	Partner	\$594.00	2.5	\$1,485.00
TOTAL:			9.5	\$6,997.50
Total Expenses:				\$0.00

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22 **VI. SERVICES PERFORMED BY NEW YORK LOCAL COUNSEL IN**
23 **CONNECTION WITH THE GARIPALLI ACTION.**

24 As reflected in prior submissions to the Court, the Receiver reviewed the key
25 pleadings in the Garipalli Action, including Essex's original and amended
26 complaints, along with materials provided by Essex's original special litigation
27 counsel for the matter, Locke Lord, and other documents supporting Essex's claims,
28 and determined that the causes of action alleged by Essex merited further

1 prosecution in order to determine, among other things, whether a near-term
2 settlement could be secured for the benefit of the Entities. As noted above, during
3 the Application Period, the Receiver, having further discussed potential litigation
4 fees and expenses with Locke Lord, determined it would be appropriate to engage
5 new special litigation counsel for the litigation and to pursue dedicated settlement
6 discussions. To that end, the Receiver decided to replace Locke Lord as special
7 litigation counsel, during the Application Period, with Teitelbaum. Accordingly,
8 both Locke Lord and Teitelbaum rendered services during the Application Period in
9 connection with the Garipalli Action.

10 **A. Locke Lord.**

11 From the inception of the instant receivership through the conclusion of its
12 services in connection therewith, Locke Lord addressed discovery issues in the
13 Garipalli Action and devoted significant time to settlement efforts, particularly in
14 connection with the June 19, 2019 settlement conference, discussed in greater detail
15 in the Receiver's Third Interim Report and prior interim reports submitted to the
16 Court. Locke Lord further developed litigation and settlement strategies for the
17 Garipalli Action, and attended various case management conferences and hearings
18 in connection therewith.

19 Over the course of its engagement for the instant receivership, Locke Lord
20 incurred \$108,639.04. Another \$26,496.00 in fees incurred during the pre-
21 receivership period, and for which Locke Lord has a claim against the Estate,
22 remain unpaid. As an accommodation to the instant receivership, and in recognition
23 of the Receiver's fiduciary duties and obligations, Locke Lord has agreed to:
24 (1) waive its right to collect all unpaid fees incurred during the pre-receivership
25 period, in the amount of \$26,496.00; and (2) provide an additional, aggregate
26 discount of \$25,000.00 against the fees and expenses incurred during the
27 receivership period. Accordingly, and given that its engagement in connection with
28 the Garipalli Action has concluded, Locke Lord hereby requests that the Court

1 approve the fees and expenses it incurred during the receivership period (i.e.,
2 December 21, 2018 through September 23, 2019, the conclusion of its engagement
3 in connection with the Garipalli Action), in the aggregate amount of \$83,639.02, and
4 authorize the Receiver to make a final payment of this amount.

5 **B. Teitelbaum.**

6 The Receiver decided to replace Locke Lord as special litigation counsel,
7 during the Application Period, with Teitelbaum, whom the Receiver concluded had
8 the requisite experience to secure an appropriate settlement of the claims alleged in
9 the Garipalli Action, on financial terms appropriately aligned with the nature of the
10 receivership. During the Application Period, Teitelbaum rendered limited services
11 in connection with the Garipalli Action, given that his engagement commenced at
12 the conclusion of the Application Period. However, Teitelbaum engaged in
13 transition efforts with respect to Garipalli Action files, conferred with Allen Matkins
14 and the Receiver regarding case strategy, and conducted a preliminary review of the
15 docket during the Application Period.

16 In the aggregate, Teitelbaum incurred \$1,900.00 in fees during the
17 Application Period and, given that its engagement is continuing, hereby requests
18 that the Court approve the fees it incurred during the Application Period, in the
19 amount of \$1,900.00, and authorize the Receiver to make an interim payment in the
20 amount of \$1,520.00.

21 **VII. THE FEES AND EXPENSES INCURRED ARE REASONABLE AND**
22 **SHOULD BE ALLOWED.**

23 The Receiver and his Professionals respectfully submit that the fees and
24 expenses each of them incurred during the Application Period, and, in the case of
25 Locke Lord, over the course of the instant receivership, were fair, reasonable,
26 necessary, and significantly benefitted the Estate of the Receivership Entities.
27 Accordingly, as noted above, the Receiver and his Professionals request that this
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1 Court approve 100% of their respective fees and expenses as noted herein, and
2 authorize the payments requested herein.

3 The billing rates charged by the Receiver and his Professionals in this matter
4 are consistent with and comparable to those charged in the community on similarly
5 complex matters. Further, and as described in the Memorandum of Points and
6 Authorities submitted in support of this Application, the billing statements of the
7 Receiver and his Professionals were submitted to the Commission for review prior
8 to the filing of this Application. No objection to the Application from the
9 Commission is expected.

10 **VIII. CONCLUSION.**

11 For the foregoing reasons, and as requested in the concurrently-submitted
12 Memorandum of Points and Authorities, the Receiver and his Professionals
13 respectfully request that this Court enter an order:

- 14 1. Granting the instant Application, in its entirety;
- 15 2. Approving the Receiver's fees, in the amount of \$151,808.70, and
16 expenses, in the amount of \$1,705.42;
- 17 3. Authorizing the Receiver to make an interim payment to himself in the
18 amount of 80% of his fees, or \$121,446.96, and 100% of his expenses, in the
19 amount of \$1,705.42, from the funds he presently holds for the administration and
20 benefit of the Receivership Entities;
- 21 4. Approving Allen Matkins' fees, in the amount of \$157,623.30, and
22 expenses, in the amount of \$707.27;
- 23 5. Authorizing the Receiver to make an interim payment to Allen Matkins
24 in the amount of 80% of its fees, or \$126,098.64, and 100% of its expenses, in the
25 amount of \$707.27, from the funds he presently holds for the administration and
26 benefit of the Receivership Entities;
- 27 6. Approving Locke Lord's fees, in the amount of \$82,844.23, and
28 expenses, in the amount of \$794.79;

1 7. Authorizing the Receiver to make a full and final payment to Locke
2 Lord in the amount of 100% of its fees, or \$82,844.23 and 100% of its expenses, in
3 the amount of \$794.79, from the funds he presently holds for the administration and
4 benefit of the Receivership Entities;

5 8. Approving Teitelbaum's fees, in the amount of \$1,900.00; and

6 9. Authorizing the Receiver to make an interim payment to Teitelbaum in
7 the amount of 80% of its fees, or \$1,520.00, from the funds he presently holds for
8 the administration and benefit of the Receivership Entities.

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10 Dated: January 8, 2020

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

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13

By: /s/ Joshua A. del Castillo

14

JOSHUA A. DEL CASTILLO
Attorneys for Receiver
GEOFF WINKLER

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SEC v. Essex Capital Corporation
Summary of Fees of Receiver and Retained Personnel
July 1, 2019 - September 30, 2019
(Sorted in Chronological Order by Activity Category)

Attachment 1

Personnel	Item / Description	Date	Hours	Rate	Amount	Activity Category
Hall, John	Kinestral and Enevale payoff research and email to GBW	07/08/19	1.50	279.00	418.50	Financial - Accounting/Auditing
Hall, John	Residuals work involving MBT and MJ	07/08/19	0.30	279.00	83.70	Financial - Corporate Finance
Hall, John	Meetings and management of vendors and personnel	07/08/19	0.40	279.00	111.60	Financial - Forensic Accounting
Hall, John	Troubleshooting, quality control and data fidelity testing	07/08/19	5.00	279.00	1,395.00	Financial - Forensic Accounting
Hall, John	Meetings with GBW to work through case management	07/08/19	0.20	279.00	55.80	Legal - Case Administration
Hall, John	Review correspondence from RTI, response and memo to GBW	07/08/19	0.30	279.00	83.70	Legal - Case Administration
Hall, John	Tasks involved in transferring Intuit account	07/08/19	0.50	279.00	139.50	Legal - Case Administration
Paterson, Caroline	Financial - Accounting/Auditing	7/8/19	1.40	225.00	315.00	Financial - Accounting/Auditing
Winkler, Geoffrey	Emails with counsel (.1), work with MBT re loan payoff, process wire transfer (.4)	7/8/19	0.50	315.00	157.50	Legal - Case Administration
Hall, John	Troubleshooting, quality control and data fidelity testing	07/09/19	4.50	279.00	1,255.50	Financial - Forensic Accounting
Hall, John	Meetings and management of vendors and personnel	07/09/19	0.30	279.00	83.70	Financial - Forensic Accounting
Hall, John	Tasks involved in transferring Intuit account	07/09/19	0.60	279.00	167.40	Legal - Case Administration
Hall, John	Meetings with GBW to work through case management issues	07/09/19	1.30	279.00	362.70	Legal - Case Administration
Paterson, Caroline	Financial - Accounting/Auditing	7/9/19	2.50	225.00	562.50	Financial - Accounting/Auditing
Winkler, Geoffrey	Call with counsel (.5), emails with MJ re loan (.2), process new request (.3)	07/09/19	1.00	315.00	315.00	Legal - Case Administration
Hall, John	Meetings and management of vendors and personnel	07/10/19	1.10	279.00	306.90	Financial - Forensic Accounting
Hall, John	Troubleshooting, quality control and data fidelity testing	07/10/19	2.20	279.00	613.80	Financial - Forensic Accounting
Hall, John	Meetings with GBW to work through case management issues	07/10/19	0.90	279.00	251.10	Legal - Case Administration
Hall, John	Tasks involved in transferring Intuit account	07/10/19	1.00	279.00	279.00	Legal - Case Administration
Hall, John	Review correspondence from RTI, response and memo to GBW	07/10/19	0.50	279.00	139.50	Legal - Case Administration
Paterson, Caroline	Financial - Accounting/Auditing	7/10/19	11.30	225.00	2,542.50	Financial - Accounting/Auditing
Winkler, Geoffrey	Emails with counsel re call (.1), emails with counsel re reimbursement request (.2)	07/10/19	0.30	315.00	94.50	Legal - Case Administration
Hall, John	Kinestral and Enevale payoff research and email to GBW	07/11/19	0.60	279.00	167.40	Financial - Accounting/Auditing
Hall, John	Running reports and analysis for report generation	07/11/19	1.30	279.00	362.70	Financial - Data Analysis
Hall, John	Review of additional received materials from five financial institutions	07/11/19	2.60	279.00	725.40	Financial - Forensic Accounting
Hall, John	Troubleshooting, quality control and data fidelity testing	07/11/19	1.00	279.00	279.00	Financial - Forensic Accounting
Hall, John	Meetings and management of vendors and personnel	07/11/19	0.20	279.00	55.80	Financial - Forensic Accounting
Hall, John	Work surrounding the lessee asset sale	07/11/19	0.80	279.00	223.20	Legal - Asset Disposition
Hall, John	Meetings with GBW to work through case management	07/11/19	0.10	279.00	27.90	Legal - Case Administration
Hall, John	Tasks involved in transferring Intuit account	07/11/19	0.40	279.00	111.60	Legal - Case Administration
Paterson, Caroline	Financial - Accounting/Auditing	7/11/19	2.70	225.00	607.50	Financial - Accounting/Auditing
Winkler, Geoffrey	Call with MJ to discuss loan payoff (.4), review funds tracing analysis and underlying documents (4.4), prepare documents to get accounts transferred (.2)	07/11/19	5.00	315.00	1,575.00	Legal - Case Administration
Hall, John	Running reports and analysis for report generation	07/12/19	3.20	279.00	892.80	Financial - Data Analysis
Hall, John	Meetings and management of vendors and personnel	07/12/19	0.30	279.00	83.70	Financial - Forensic Accounting
Hall, John	Review of additional received materials from five financial institutions	07/12/19	4.80	279.00	1,339.20	Financial - Forensic Accounting
Hall, John	Meetings with GBW to work through case management	07/12/19	0.60	279.00	167.40	Legal - Case Administration
Paterson, Caroline	Financial - Accounting/Auditing	7/12/19	5.60	225.00	1,260.00	Financial - Accounting/Auditing
Winkler, Geoffrey	Call with SEC (.8), call with JH to discuss TM questions, emails (.9)	07/12/19	1.70	315.00	535.50	Legal - Case Administration

SEC v. Essex Capital Corporation
Summary of Fees of Receiver and Retained Personnel
July 1, 2019 - September 30, 2019
(Sorted in Chronological Order by Activity Category)

Attachment 1

Personnel	Item / Description	Date	Hours	Rate	Amount	Activity Category
Hall, John	Preparation for and call with lessee re: lease buyout	07/15/19	2.50	279.00	697.50	Financial - Corporate Finance
Hall, John	Prep for and team meeting with GBW, JA, CP	07/15/19	1.00	279.00	279.00	Financial - Forensic Accounting
Hall, John	Troubleshooting and quality control of forensic accounting data, work with JA and CP to determine needed work product	07/15/19	3.40	279.00	948.60	Financial - Forensic Accounting
Hall, John	Discuss case with GBW	07/15/19	0.10	279.00	27.90	Legal - Case Administration
Paterson, Caroline	Financial - Accounting/Auditing	7/15/19	14.40	225.00	3,240.00	Financial - Accounting/Auditing
Winkler, Geoffrey	Call with team to discuss status (.6), call with lessee to discuss buyout (.5), review email from RI re leases, emails with JH (.2)	07/15/19	1.30	315.00	409.50	Legal - Case Administration
Hall, John	Troubleshooting and quality control of forensic accounting data, work with JA and CP to determine needed work product	07/16/19	5.10	279.00	1,422.90	Financial - Forensic Accounting
Hall, John	Discuss accounting progress with NA	07/16/19	0.50	279.00	139.50	Legal - Case Administration
Hall, John	Discussion of banking issues with MJ and GBW	07/16/19	0.40	279.00	111.60	Legal - Case Administration
Hall, John	Discuss case with GBW	07/16/19	1.30	279.00	362.70	Legal - Case Administration
Paterson, Caroline	Financial - Accounting/Auditing	7/16/19	9.70	225.00	2,182.50	Financial - Accounting/Auditing
Winkler, Geoffrey	Call with MBT to discuss lease, other issues (.7)	07/16/19	0.70	315.00	220.50	Legal - Case Administration
Hall, John	Troubleshooting and quality control of forensic accounting data, work with JA and CP to determine needed work product	07/17/19	2.10	279.00	585.90	Financial - Forensic Accounting
Hall, John	Discuss case with GBW	07/17/19	0.80	279.00	223.20	Legal - Case Administration
Paterson, Caroline	Financial - Accounting/Auditing	7/17/19	3.10	225.00	697.50	Financial - Accounting/Auditing
Winkler, Geoffrey	Gather and analyze current cash position and upcoming cash flow (2.2)	07/17/19	2.20	315.00	693.00	Legal - Case Administration
Hall, John	Preparation for, discussion with, and wrap work regarding lessee with JS GBW	07/18/19	1.20	279.00	334.80	Financial - Corporate Finance
Hall, John	Forensic Accounting	07/18/19	8.20	279.00	2,287.80	Financial - Forensic Accounting
Hall, John	Discuss case with GBW	07/18/19	0.10	279.00	27.90	Legal - Case Administration
Winkler, Geoffrey	Call with client to discuss investment (.6)	07/18/19	0.60	315.00	189.00	Legal - Case Administration
Hall, John	Forensic Accounting	07/19/19	10.30	279.00	2,873.70	Financial - Forensic Accounting
Hall, John	Discuss case with GBW	07/19/19	0.30	279.00	83.70	Legal - Case Administration
Winkler, Geoffrey	Review accounting documentation and prepare analysis (2.3)	07/19/19	2.30	315.00	724.50	Legal - Case Administration
Winkler, Geoffrey	Draft financial information for second interim report and correspond with counsel (3.7), call with JH (.6)	07/22/19	4.30	315.00	1,354.50	Legal - Case Administration
Hall, John	Cleanup of data in preparation for analysis. Standardization, and setting up correct chart of accounts.	07/23/19	7.50	279.00	2,092.50	Financial - Forensic Accounting
Winkler, Geoffrey	Discuss case with counsel (.4), review related entity financials (.2)	07/23/19	0.60	315.00	189.00	Legal - Case Administration
Hall, John	Asset list creation for report	07/24/19	1.20	279.00	334.80	Financial - Accounting/Auditing
Hall, John	Cleanup of data in preparation for analysis. Standardization, and setting up correct chart of accounts.	07/24/19	6.40	279.00	1,785.60	Financial - Forensic Accounting
Hall, John	Arranging the transportation of checking documents to transfer to GBW and JBH	07/24/19	0.50	279.00	139.50	Legal - Case Administration
Hall, John	Emails and discussions relating to RTI's request for monetary reimbursement	07/24/19	2.50	279.00	697.50	Legal - Case Administration
Winkler, Geoffrey	Emails with RI, JD, and counsel re reimbursement issue (.3), emails with counsel re accounting questions (.2)	07/24/19	0.50	315.00	157.50	Legal - Case Administration
Hall, John	Cleanup of data in preparation for analysis. Standardization, and setting up correct chart of accounts.	07/25/19	7.10	279.00	1,980.90	Financial - Forensic Accounting

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Hall, John	Lease operations	07/25/19	0.50	279.00	139.50	Legal - Business Operations
Winkler, Geoffrey	Review loan payoff and residual asset purchase (.3)	07/25/19	0.30	315.00	94.50	Legal - Case Administration
Hall, John	Cleanup of data in preparation for analysis. Standardization, and setting up correct chart of accounts.	07/26/19	9.00	279.00	2,511.00	Financial - Forensic Accounting
Hall, John	Lease operations	07/26/19	0.40	279.00	111.60	Legal - Business Operations
Winkler, Geoffrey	Review question and respond to two investors (.3), review order from court, prepare payment, emails with counsel (1.2)	07/26/19	1.50	315.00	472.50	Legal - Case Administration
Hall, John	Correcting and integrating data, chart of accounts, standardizing names	07/29/19	9.50	279.00	2,650.50	Financial - Forensic Accounting
Winkler, Geoffrey	Work with BS to make changes to engagement letter and emails with clients (.7)	07/29/19	0.70	315.00	220.50	Legal - Case Administration
Hall, John	Correcting and integrating data, chart of accounts, standardizing names	07/30/19	9.00	279.00	2,511.00	Financial - Forensic Accounting
Hall, John	Discussion of case with GBW	07/30/19	0.60	279.00	167.40	Legal - Case Administration
Winkler, Geoffrey	Review and adjust work, emails with counsel, calls with JH (3.3), emails with investor (.1)	07/30/19	3.40	315.00	1,071.00	Legal - Case Administration
Hall, John	Correcting and integrating data, chart of accounts, standardizing names	07/31/19	8.00	279.00	2,232.00	Financial - Forensic Accounting
Hall, John	Discussion of case with GBW	07/31/19	0.60	279.00	167.40	Legal - Case Administration
Winkler, Geoffrey	Review annotations and update files (1.9), review payoff request from lessee and respond (.2)	07/31/19	2.10	315.00	661.50	Legal - Case Administration
Hall, John	Correcting and integrating data, chart of accounts, standardizing names	08/01/19	7.50	279.00	2,092.50	Financial - Forensic Accounting
Hall, John	Discussion of case with GBW	08/01/19	0.30	279.00	83.70	Legal - Case Administration
Hall, John	Discuss case with claimant	08/01/19	0.30	279.00	83.70	Legal - Case Administration
Winkler, Geoffrey	Update annotation for new period (.8), review and respond to emails with lessee (.2)	08/01/19	1.00	315.00	315.00	Legal - Case Administration
Hall, John	Report analysis creation	08/02/19	8.40	279.00	2,343.60	Financial - Forensic Accounting
Hall, John	Discussion of case with GBW	08/02/19	0.10	279.00	27.90	Legal - Case Administration
Winkler, Geoffrey	Final annotations to second quarter documents (.6)	08/02/19	0.60	315.00	189.00	Legal - Case Administration
Hall, John	Report analysis and table creation	08/05/19	3.50	279.00	976.50	Financial - Forensic Accounting
Hall, John	Analyzing EO; creating specific wire request for MBT and send to MJ	08/05/19	0.80	279.00	223.20	Financial - Forensic Accounting
Hall, John	Lessee lease and payment history research and memo the GBW regarding lease termination obligations	08/05/19	2.00	279.00	558.00	Legal - Business Operations
Hall, John	Discuss report drafting with GBW, case management discussions	08/05/19	0.20	279.00	55.80	Legal - Case Administration
Hall, John	Review report	08/05/19	0.50	279.00	139.50	Legal - Case Administration
Hall, John	Creating accounting overview table for GBW 1995-2018	08/05/19	1.40	279.00	390.60	Legal - Case Administration
Winkler, Geoffrey	Review lessee buyout emails (.2), review and prepare second interim report (2.6), reviewing banking and emails with JH re buyout payment (.2), prepare financials for second interim report (1.6)	08/05/19	4.60	315.00	1,449.00	Legal - Case Administration
Hall, John	Report analysis and table creation	08/06/19	7.00	279.00	1,953.00	Financial - Forensic Accounting
Hall, John	Analysis of investor cash received with accompanying table to GBW	08/06/19	2.20	279.00	613.80	Legal - Case Administration
Hall, John	Discuss report drafting with GBW, case management discussions	08/06/19	1.10	279.00	306.90	Legal - Case Administration
Winkler, Geoffrey	Rev. inv. models, emails with JH (.3), call with JH (.5), review interim report and update (.7), emails with lessee re buyout (.2), call with lessee (.3), emails with counsel re req. docs (.1), emails to counsel re loans (.1), call JH (.2), update (2.2)	08/06/19	2.90	315.00	913.50	Legal - Case Administration

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Personnel	Item / Description	Date	Hours	Rate	Amount	Activity Category
Hall, John	Data analysis, table creation, report drafting, and editing	08/07/19	7.50	279.00	2,092.50	Financial - Data Analysis
Hall, John	Affected investor FAQ, follow up email	08/07/19	0.50	279.00	139.50	Legal - Case Administration
Hall, John	Discuss report drafting with GBW, case management discussions	08/07/19	0.50	279.00	139.50	Legal - Case Administration
Winkler, Geoffrey	Review email from GV re tax returns, email to JH (.1), emails with MBT re loan buyout (.2), emails with lessee, review email re timing (.2), review, draft and finalize second interim report (2.9), gather and review requested documents (2.2)	08/07/19	5.60	315.00	1,764.00	Legal - Case Administration
Hall, John	Review bank reports	08/08/19	0.60	279.00	167.40	Financial - Corporate Finance
Hall, John	Flowonix lease and payment history research and memo the GBW regarding lease termination obligations	08/08/19	0.50	279.00	139.50	Legal - Business Operations
Hall, John	Lease operations-Imprimis sale	08/08/19	0.50	279.00	139.50	Legal - Business Operations
Hall, John	Lease operations for two leases	08/08/19	0.20	279.00	55.80	Legal - Business Operations
Hall, John	Research and list out QB files found for counsel	08/08/19	0.70	279.00	195.30	Legal - Case Administration
Hall, John	Working through report detail questions with counsel	08/08/19	4.20	279.00	1,171.80	Legal - Case Administration
Hall, John	Discuss report drafting with GBW, case management discussions	08/08/19	0.10	279.00	27.90	Legal - Case Administration
Winkler, Geoffrey	Emails with JH re notice timing (.1), emails with counsel re report review (.2)	08/08/19	0.30	315.00	94.50	Legal - Case Administration
Hall, John	Lease operations for two leases	08/09/19	0.50	279.00	139.50	Legal - Business Operations
Hall, John	Lease operations discussion and follow up email with JS	08/09/19	1.00	279.00	279.00	Legal - Business Operations
Hall, John	Discuss case FAQ with investor	08/09/19	0.40	279.00	111.60	Legal - Case Administration
Hall, John	Working through report detail questions with counsel	08/09/19	1.20	279.00	334.80	Legal - Case Administration
Hall, John	Restoring access to accounts	08/09/19	0.90	279.00	251.10	Legal - Case Administration
Hall, John	Discuss report drafting with GBW, case management discussions	08/09/19	1.20	279.00	334.80	Legal - Case Administration
Winkler, Geoffrey	Call with counsel to discuss second interim report (1.0), review emails from potential claimant, emails with counsel (.2), review counsel email re financials (.1), review cash account and prepare for turnover (.2), review message from investor (.1)	08/09/19	1.60	315.00	504.00	Legal - Case Administration
Hall, John	Researchinvestor totals and summary memo to counsel	08/12/19	1.40	279.00	390.60	Legal - Case Administration
Winkler, Geoffrey	Review email from counsel re investor calculations, emails with counsel re status and hearing (.4), review proposed consent and comments to counsel (.3)	08/12/19	0.70	315.00	220.50	Legal - Case Administration
Hall, John	Research and preparation on investments	08/13/19	7.20	279.00	2,008.80	Financial - Forensic Accounting
Hall, John	Discuss case administration activities with GBW	08/13/19	0.90	279.00	251.10	Legal - Case Administration
Hall, John	Discuss case with GW and counsel	08/13/19	0.60	279.00	167.40	Legal - Case Administration
Winkler, Geoffrey	Review email from lessee re buyout questions, emails with JH (.2), reach out to lessee re wire transfer instructions (.2)	08/13/19	0.40	315.00	126.00	Legal - Case Administration
Hall, John	Research and preparation on investments	08/14/19	6.90	279.00	1,925.10	Financial - Forensic Accounting
Hall, John	Discuss case administration activities with GBW	08/14/19	0.90	279.00	251.10	Legal - Case Administration
Winkler, Geoffrey	Call with lessee to discuss residual payment (.7), review updated consent and take to notary for signature (1.1), emails with RI re lease details (.2), emails with counsel re outstanding lease issues (.3), emails with counsel re late payment charges (.1)	08/14/19	2.80	315.00	882.00	Legal - Case Administration
Hall, John	Research and preparation on investments	08/15/19	1.20	279.00	334.80	Financial - Forensic Accounting
Hall, John	Discuss case administration activities with GBW	08/15/19	2.10	279.00	585.90	Legal - Case Administration
Hall, John	Entity related research in support of documentation	08/15/19	3.30	279.00	920.70	Legal - Case Administration

SEC v. Essex Capital Corporation
Summary of Fees of Receiver and Retained Personnel
July 1, 2019 - September 30, 2019
(Sorted in Chronological Order by Activity Category)

Attachment 1

Personnel	Item / Description	Date	Hours	Rate	Amount	Activity Category
Hall, John	Updates to report after discussion with counsel	08/15/19	1.50	279.00	418.50	Legal - Case Administration
Winkler, Geoffrey	Call with counsel (.8), call with JH (.5)	08/15/19	1.30	315.00	409.50	Legal - Case Administration
Hall, John	Research and memo to DZ on lessee	08/16/19	1.70	279.00	474.30	Legal - Business Operations
Hall, John	Obtain copy of partnership return for affected investor	08/16/19	2.00	279.00	558.00	Legal - Case Administration
Hall, John	Discuss case administration activities with GBW	08/16/19	0.60	279.00	167.40	Legal - Case Administration
Hall, John	Work with counsel on updating and responding to inquiries	08/16/19	1.20	279.00	334.80	Legal - Case Administration
Hall, John	Creating schedules for counsel's use	08/16/19	2.20	279.00	613.80	Legal - Case Administration
Hall, John	Discuss case with counsel	08/16/19	0.20	279.00	55.80	Legal - Case Administration
Winkler, Geoffrey	Review conformed copies, post to website, email to interested parties re filings (1.6), call from lessee (.2), emails with counsel re notice and posting (.2)	08/16/19	2.00	315.00	630.00	Legal - Case Administration
Hall, John	Bill of sale and UCC work	08/19/19	4.20	279.00	1,171.80	Legal - Business Operations
Hall, John	List of late fees charged by MBT itemized to counsel	08/19/19	0.50	279.00	139.50	Legal - Business Operations
Hall, John	Discuss lease and make payment demand. Related collection activities	08/19/19	0.60	279.00	167.40	Legal - Business Operations
Hall, John	Case admin discussion with GBW	08/19/19	0.20	279.00	55.80	Legal - Case Administration
Hall, John	Correspondence and check data with MBT	08/19/19	0.50	279.00	139.50	Legal - Case Administration
Hall, John	Scanning and emailing return to GVV	08/19/19	0.30	279.00	83.70	Legal - Case Administration
Hall, John	Research and respond to counsel's questions on settlement communication	08/19/19	1.50	279.00	418.50	Legal - Case Administration
Winkler, Geoffrey	Review banking (.8), review and execute bill of sale (.2), review discussion with counsel re investments and respond (.3)	08/19/19	1.30	315.00	409.50	Legal - Case Administration
Hall, John	Call with brokerage re: account ownership transfer	08/20/19	0.40	279.00	111.60	Financial - Corporate Finance
Hall, John	Request follow ups on outstanding issues from NA	08/20/19	1.50	279.00	418.50	Financial - Forensic Accounting
Hall, John	Research lease buyouts and contact HG re: purchase of residual assets	08/20/19	1.20	279.00	334.80	Legal - Business Operations
Hall, John	Discuss lessee and make payment demand. Related collection activities	08/20/19	1.40	279.00	390.60	Legal - Business Operations
Hall, John	Lessee bill of sale and UCC work	08/20/19	0.80	279.00	223.20	Legal - Business Operations
Hall, John	Deliver documents to lessee	08/20/19	0.30	279.00	83.70	Legal - Business Operations
Hall, John	Lease buyout activities	08/20/19	0.10	279.00	27.90	Legal - Business Operations
Hall, John	Affected investor FAQ	08/20/19	0.30	279.00	83.70	Legal - Case Administration
Hall, John	Case admin discussion with GBW	08/20/19	0.30	279.00	83.70	Legal - Case Administration
Hall, John	Discussion with DZ re: settlement discussions and follow up call with GBW	08/20/19	0.60	279.00	167.40	Legal - Case Administration
Hall, John	Case discussion with DZ and GBW re: third party	08/20/19	0.50	279.00	139.50	Legal - Case Administration
Hall, John	Call with PT re: affected investor's holdings in pension plan	08/20/19	0.70	279.00	195.30	Legal - Case Administration
Winkler, Geoffrey	Discuss case with new associate and setup (1.1)	08/20/19	1.10	315.00	346.50	Legal - Case Administration
Hall, John	Intake of received MBT files	08/21/19	1.10	279.00	306.90	Financial - Accounting/Auditing
Hall, John	Research and work with NA re outstanding requests	08/21/19	1.00	279.00	279.00	Financial - Forensic Accounting
Hall, John	Discuss lessee and make payment demand. Related collection activities	08/21/19	0.20	279.00	55.80	Legal - Business Operations
Hall, John	Call with HG re: lease buyouts	08/21/19	0.40	279.00	111.60	Legal - Business Operations
Hall, John	Lease buyout activities	08/21/19	0.40	279.00	111.60	Legal - Business Operations

SEC v. Essex Capital Corporation
Summary of Fees of Receiver and Retained Personnel
July 1, 2019 - September 30, 2019
(Sorted in Chronological Order by Activity Category)

Attachment 1

Personnel	Item / Description	Date	Hours	Rate	Amount	Activity Category
Hall, John	Case admin discussion with GBW	08/21/19	0.70	279.00	195.30	Legal - Case Administration
Hall, John	Preparing hearing prep materials for GBW	08/21/19	4.50	279.00	1,255.50	Legal - Case Administration
Winkler, Geoffrey	Prepare for Essex hearing, review documents, call with counsel (4.3), discuss QB with JH (.2), email to interested party re call (.1)	08/21/19	4.60	315.00	1,449.00	Legal - Case Administration
Hall, John	Analysis of potential third parties	08/22/19	1.00	279.00	279.00	Financial - Data Analysis
Hall, John	Call with CW re: third party analysis	08/22/19	0.80	279.00	223.20	Financial - Forensic Accounting
Hall, John	Review of GG materials from DZ; research and memo to group.	08/22/19	2.80	279.00	781.20	Financial - Forensic Accounting
Hall, John	Lease buyout activities	08/22/19	0.20	279.00	55.80	Legal - Business Operations
Hall, John	Onboarding process documentation and onboarding of CW	08/22/19	3.50	279.00	976.50	Legal - Case Administration
Hall, John	Case admin discussion with GBW	08/22/19	0.10	279.00	27.90	Legal - Case Administration
Winkler, Geoffrey	Meeting with counsel (1.5), court hearing (1.0), meeting with counsel to discuss case (1.5)	08/22/19	4.00	315.00	1,260.00	Legal - Case Administration
Hall, John	Analysis of potential third parties	08/23/19	3.90	279.00	1,088.10	Financial - Data Analysis
Hall, John	Discuss lessee and make payment demand. Related collection activities	08/23/19	0.10	279.00	27.90	Legal - Business Operations
Hall, John	Case admin discussion with GBW	08/23/19	0.90	279.00	251.10	Legal - Case Administration
Hall, John	Case discussions with GBW	08/23/19	0.90	279.00	251.10	Legal - Case Administration
Winkler, Geoffrey	Work with associate on case (.4)	08/23/19	0.40	315.00	126.00	Legal - Case Administration
Hall, John	Third party analysis, and working with CW	08/26/19	1.40	279.00	390.60	Financial - Data Analysis
Hall, John	Discuss Case with CW, troubleshoot	08/26/19	0.80	279.00	223.20	Financial - Forensic Accounting
Hall, John	Case discussion with GBW	08/26/19	0.30	279.00	83.70	Legal - Case Administration
Hall, John	Call with GW and RI, work to provide RI with needed statements	08/26/19	2.80	279.00	781.20	Legal - Case Administration
Winkler, Carrie	Call with JBH (0.3), prepared information necessary for project (1.4), locate and match investor transactions (3.2), call with JBH (0.3), locate and match investor transactions (3.8) Call with counsel (.4), call with JH to discuss (.3), call with RI and JH to discuss records (.6), emails with counsel re update on property status (.2), review financials for related entity (.3)	08/26/19	8.50	175.00	1,487.50	Financial - Accounting/Auditing
Winkler, Geoffrey	Third party analysis, and working with CW	08/26/19	1.80	315.00	567.00	Legal - Case Administration
Hall, John	Reviewed additional investor file (0.6), call with JBH (0.2), locate and match investor transactions (0.5), locate and match investor transactions (2.1)	08/27/19	2.00	279.00	558.00	Financial - Data Analysis
Winkler, Carrie	Email with TW to discuss accounting file (.2), work with CW re timing (.3), review proposed order and emails with counsel (.4), emails with JH re document production (.2)	08/27/19	3.40	175.00	595.00	Financial - Accounting/Auditing
Winkler, Geoffrey	Email to counsel detailing RI request	08/27/19	1.10	315.00	346.50	Legal - Case Administration
Hall, John	Email to counsel detailing RI request	08/28/19	0.50	279.00	139.50	Legal - Case Administration
Winkler, Geoffrey	Emails with counsel re call (.1), emails with investor's counsel re call (.1)	08/28/19	0.20	315.00	63.00	Legal - Case Administration
Hall, John	Third party analysis, and working with CW	08/29/19	1.20	279.00	334.80	Financial - Data Analysis
Hall, John	Drafting bill of sale, UCC search	08/29/19	2.50	279.00	697.50	Legal - Business Operations
Hall, John	Case discussion with GBW	08/29/19	0.50	279.00	139.50	Legal - Case Administration
Hall, John	Discuss case with GBW and DZ, additional research and follow up	08/29/19	1.20	279.00	334.80	Legal - Case Administration
Winkler, Carrie	Call with JBH (0.2), locate and save investor transactions (1.3)	08/29/19	1.50	175.00	262.50	Financial - Accounting/Auditing

SEC v. Essex Capital Corporation
Summary of Fees of Receiver and Retained Personnel
July 1, 2019 - September 30, 2019
(Sorted in Chronological Order by Activity Category)

Attachment 1

Personnel	Item / Description	Date	Hours	Rate	Amount	Activity Category
Winkler, Geoffrey	Call with DZ and JH to discuss investor claims (.8), call with JH to discuss claims (.3), call with counsel for investor to discuss status (.4), review SEC filing (.1)	08/29/19	1.60	315.00	504.00	Legal - Case Administration
Hall, John	Third party analysis, and working with CW	08/30/19	2.00	279.00	558.00	Financial - Data Analysis
Hall, John	Drafting bill of sale, UCC search	08/30/19	0.60	279.00	167.40	Legal - Business Operations
Winkler, Carrie	Locate and save investor transactions (1.0)	08/30/19	1.00	175.00	175.00	Financial - Accounting/Auditing
Winkler, Geoffrey	Emails with RI and counsel re assets (.3), review email from defendant's counsel re interests (.2)	08/30/19	0.50	315.00	157.50	Legal - Case Administration
Winkler, Geoffrey	Legal - Case Administration	09/02/19	0.10	315.00	31.50	Legal - Case Administration
Hall, John	Third party investigation and analysis work with CW	09/03/19	2.40	279.00	669.60	Financial - Forensic Accounting
Hall, John	Case discussion with GBW	09/03/19	0.20	279.00	55.80	Legal - Case Administration
Hall, John	Affected investor FAQ	09/03/19	0.70	279.00	195.30	Legal - Case Administration
Winkler, Carrie	Prepare information for project (0.4), locate and match investor transactions (5.8)	09/03/19	6.20	175.00	1,085.00	Financial - Accounting/Auditing
Winkler, Geoffrey	Call with RI to discuss documents and assets (.6), call with counsel (.3), call with JBH (.3), work with counsel and review permanent injunction (.5)	09/03/19	1.70	315.00	535.50	Legal - Case Administration
Hall, John	Work through times with MJ at MBT	09/04/19	1.50	279.00	418.50	Financial - Corporate Finance
Hall, John	Third party investigation and analysis work with CW	09/04/19	1.80	279.00	502.20	Financial - Forensic Accounting
Hall, John	Lease buyout calls and related work	09/04/19	1.20	279.00	334.80	Legal - Business Operations
Winkler, Carrie	Communicate with JBH via message/email (0.2), locate and match investor transactions (0.8)	09/04/19	1.00	175.00	175.00	Financial - Accounting/Auditing
Winkler, Geoffrey	Emails with counsel re contact with lessee (.2)	09/04/19	0.20	315.00	63.00	Legal - Case Administration
Winkler, Geoffrey	Emails with lessee (.2)	09/04/19	0.20	315.00	63.00	Legal - Case Administration
Hall, John	Third party investigation and analysis work with CW	09/05/19	1.30	279.00	362.70	Financial - Forensic Accounting
Hall, John	Discuss case with GBW	09/05/19	0.20	279.00	55.80	Legal - Case Administration
Winkler, Carrie	Prepare information and templates for project (0.6), locate/match investor transactions (2.4), review additional documents (0.4), locate/match investor transactions (3.6)	09/05/19	7.00	175.00	1,225.00	Financial - Accounting/Auditing
Hall, John	Third party investigation and analysis work with CW	09/06/19	4.20	279.00	1,171.80	Financial - Forensic Accounting
Hall, John	Lease buyout calls and related work	09/06/19	2.50	279.00	697.50	Legal - Business Operations
Hall, John	Discuss case with GBW	09/06/19	0.50	279.00	139.50	Legal - Case Administration
Winkler, Carrie	Locate/match investor transactions (1.5)	09/06/19	1.50	175.00	262.50	Financial - Accounting/Auditing
Hall, John	Working through data issues with NA	09/09/19	0.30	279.00	83.70	Financial - Data Analysis
Hall, John	Discuss 3rd party accounting with counsel	09/09/19	0.30	279.00	83.70	Financial - Forensic Accounting
Hall, John	Report and memo to team on 3rd party	09/09/19	2.10	279.00	585.90	Financial - Forensic Accounting
Hall, John	Discuss case with GBW	09/09/19	1.20	279.00	334.80	Legal - Case Administration
Winkler, Carrie	prepare information for project (0.6), locate/match investor transactions (2.4), complete summary sheet (0.5)	09/09/19	3.50	175.00	612.50	Financial - Accounting/Auditing
Winkler, Geoffrey	Review update email, call to counsel, email to counsel (.2), emails with counsel for investor (.1), review orders and prepare payments (.5)	09/09/19	0.80	315.00	252.00	Legal - Case Administration
Hall, John	Documentation and 3rd party research; working with CW	09/10/19	2.10	279.00	585.90	Financial - Forensic Accounting
Hall, John	Research analysis and memo to team on 3rd party	09/10/19	3.30	279.00	920.70	Financial - Forensic Accounting

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

Personnel	Item / Description	Date	Hours	Rate	Amount	Activity Category
Hall, John	Related lease and warrant issues	09/10/19	0.60	279.00	167.40	Legal - Business Operations
Hall, John	Retrieve requested documents for RTI	09/10/19	2.00	279.00	558.00	Legal - Case Administration
Hall, John	Discuss case with GBW	09/10/19	0.20	279.00	55.80	Legal - Case Administration
Winkler, Carrie	Prepare information for project (1.2), locate/match investor transactions (2.2) Emails with investors counsel (.1), call with JBH (.4), emails with RI re settlement (.1)	09/10/19	3.40	175.00	595.00	Financial - Accounting/Auditing
Winkler, Geoffrey		09/10/19	0.60	315.00	189.00	Legal - Case Administration
Hall, John	Analysis, gathering documentation, memo to team in re intervention	09/11/19	1.50	279.00	418.50	Financial - Business Analysis
Hall, John	Analysis and compilation of potential third party. Work with CW on third party analysis, escalated issues.	09/11/19	3.00	279.00	837.00	Financial - Forensic Accounting
Hall, John	Review warrants and determine transfers	09/11/19	0.70	279.00	195.30	Legal - Business Operations
Hall, John	Discuss receivership entity and research with GW	09/11/19	1.20	279.00	334.80	Legal - Case Administration
Hall, John	Call with RTI to discuss entity	09/11/19	0.50	279.00	139.50	Legal - Case Administration
Hall, John	Call with affected investor and counsel	09/11/19	1.00	279.00	279.00	Legal - Case Administration
Winkler, Geoffrey	Call with investors counsel to discuss case (1.0), review emails from counsel re intervention, emails and call with counsel (.3), call with RI (.7)	09/11/19	2.00	315.00	630.00	Legal - Case Administration
Winkler, Geoffrey	Discussion with JH (.4)	09/12/19	0.40	315.00	126.00	Legal - Case Administration
Hall, John	Review lease and warrant option contracts for expiring leases.	09/13/19	1.20	279.00	334.80	Financial - Business Analysis
Hall, John	Research analyses and compile data and potential third parties	09/13/19	2.00	279.00	558.00	Financial - Forensic Accounting
Hall, John	Review correspondence and memo to GW	09/13/19	0.40	279.00	111.60	Legal - Business Operations
Hall, John	Case administration discussions with GW	09/13/19	0.60	279.00	167.40	Legal - Case Administration
Winkler, Carrie	Locate/match investor transactions (1.4) Emails with KM to arrange call (.2), emails with MBT re withholding (.2), emails with counsel to discuss investor (.2)	09/13/19	1.40	175.00	245.00	Financial - Accounting/Auditing
Winkler, Geoffrey	Analysis and memo to team on commercial lease	09/13/19	0.60	315.00	189.00	Legal - Case Administration
Hall, John	Management, billing analysis and forecasting work with GW	09/16/19	0.70	279.00	195.30	Legal - Business Operations
Hall, John		09/16/19	0.90	279.00	251.10	Legal - Case Administration
Winkler, Carrie	Prepare information for project (0.4), communicate with JBH re: project status (0.2), locate/match investor transactions (4.2) Call with KM (.3), review option to purchase and emails with JH (.3), emails with TD to discuss application (.2)	09/16/19	4.80	175.00	840.00	Financial - Accounting/Auditing
Winkler, Geoffrey		09/16/19	0.80	315.00	252.00	Legal - Case Administration
Hall, John	Review outstanding request issues and follow up with NA	09/17/19	1.00	279.00	279.00	Financial - Forensic Accounting
Hall, John	Analysis and compilation of documentation for potential third party activities	09/17/19	1.90	279.00	530.10	Financial - Forensic Accounting
Hall, John	Review and analysis of third party review escalated issues	09/17/19	1.80	279.00	502.20	Financial - Forensic Accounting
Hall, John	Review analysis and memo regarding outstanding leases	09/17/19	1.50	279.00	418.50	Legal - Business Operations
Hall, John	Reviewing and researching WBE asset, memo to GBW	09/17/19	1.00	279.00	279.00	Legal - Case Administration
Winkler, Carrie	Review progress, verify location of information (0.3), locate/match investor transactions (2.8) Emails and call with counsel to discuss buyout (.4), email to Km re call (.1), respond to investor emails (.2), discussion with parties re lease status (.8), call with counsel (.3), gather documents, call with counsel to discuss (.4), review documents and	09/17/19	3.10	175.00	542.50	Financial - Accounting/Auditing
Winkler, Geoffrey	Review and analysis of third party review escalated issues	09/17/19	3.30	315.00	1,039.50	Legal - Case Administration
Hall, John		09/18/19	0.40	279.00	111.60	Financial - Forensic Accounting
Hall, John	Review and analyses compiled data on third party, memo to team	09/18/19	2.10	279.00	585.90	Financial - Forensic Accounting

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Attachment 1

Personnel	Item / Description	Date	Hours	Rate	Amount	Activity Category
Hall, John	Analysis and compilation of documentation for potential third party activities	09/18/19	2.40	279.00	669.60	Financial - Forensic Accounting
Hall, John	Review and comment on MDNA	09/18/19	1.00	279.00	279.00	Legal - Case Administration
Hall, John	Discuss lease and review files and send amortization schedule to DX	09/18/19	0.90	279.00	251.10	Legal - Case Administration
Hall, John	Request from counsel, compile info, analysis and memo to team	09/18/19	1.30	279.00	362.70	Legal - Case Administration
Winkler, Carrie	Locate/match investor transactions	09/18/19	1.50	175.00	262.50	Financial - Accounting/Auditing
	Call with lessor to discuss buyout (.5), call with counsel to discuss asset valuation (.3), review NDA and send to counsel for discussion (.2), respond to party re equipment purchase (.2)					
Winkler, Geoffrey	Work with lessee and MBT re: residual buyout and terminal lease payment negotiation	09/18/19	1.20	315.00	378.00	Legal - Case Administration
Hall, John		09/19/19	1.60	279.00	446.40	Financial - Corporate Finance
Hall, John	Review and analysis of third party review escalated issues	09/19/19	1.80	279.00	502.20	Financial - Forensic Accounting
Hall, John	Review response from JP counsel, investigate all details and response to team	09/19/19	4.80	279.00	1,339.20	Financial - Forensic Accounting
	Review document request from bank, call with bank to discuss (.4), emails with counsel re investor inquiry (.1)					
Winkler, Geoffrey		09/19/19	0.50	315.00	157.50	Legal - Case Administration
Hall, John	Analysis and compilation of documentation for potential third party activities	09/20/19	2.50	279.00	697.50	Financial - Forensic Accounting
Hall, John	CVL research, documentation, and work through with GBW and then team	09/20/19	3.20	279.00	892.80	Legal - Business Operations
	Review offer from buyer, emails to counsel and JH (.3), review documents in prep for call (1.3)					
Winkler, Geoffrey		09/20/19	1.60	315.00	504.00	Legal - Case Administration
Hall, John	Requested documentation and analysis requested by DZ for discussions with MN	09/23/19	2.40	279.00	669.60	Financial - Forensic Accounting
Hall, John	Provide documentation and analysis requested by JDC	09/23/19	1.40	279.00	390.60	Legal - Case Administration
Winkler, Carrie	Verify transactions and adjust as needed (2.5), communicate with JBH (1.3)	09/23/19	3.80	175.00	665.00	Financial - Accounting/Auditing
	Review and respond to email from counsel re accounting (.2), review engagement letter and email to counsel (.3), emails with counsel re call time (.1), review update email from buyer and respond (.2)					
Winkler, Geoffrey		09/23/19	0.80	315.00	252.00	Legal - Case Administration
Hall, John	Lease operations review	09/24/19	0.60	279.00	167.40	Legal - Business Operations
Hall, John	Provide documents to RTI	09/24/19	2.00	279.00	558.00	Legal - Case Administration
Winkler, Carrie	Verify/match wire transfers	09/24/19	0.80	175.00	140.00	Financial - Accounting/Auditing
Hall, John	Review materials from lessee; create invoice and associated bookkeeping	09/25/19	0.80	279.00	223.20	Legal - Business Operations
Hall, John	Review outstanding items and case activity with GBW	09/25/19	0.90	279.00	251.10	Legal - Case Administration
Hall, John	Work with GBW re: RTI ongoing requests	09/25/19	0.20	279.00	55.80	Legal - Case Administration
	Emails with RI re call (.1), call with counsel to discuss offer and situation (.6), call with other counsel re notice in case (.3)					
Winkler, Geoffrey		09/25/19	1.00	315.00	315.00	Legal - Case Administration
Hall, John	Memo to DZ on ongoing negotiation issues	09/26/19	0.40	279.00	111.60	Financial - Forensic Accounting
	Call with RI (1.0), review and respond to sale offer (.3), review motion (.3), call with counsel (.5), review August financials (.2), emails with counsel to discuss offer response (.2)					
Winkler, Geoffrey		09/26/19	2.50	315.00	787.50	Legal - Case Administration
Hall, John	Memo to DZ on ongoing negotiation issues	09/27/19	2.30	279.00	641.70	Financial - Forensic Accounting
	Call with new litigation counsel and receivership counsel (1.0), review opposition motion and discussion with counsel (.5)					
Winkler, Geoffrey		09/27/19	1.50	315.00	472.50	Legal - Case Administration
Hall, John	Case review with GBW	09/30/19	1.00	279.00	279.00	Legal - Case Administration
Hall, John	Review and discuss declaration with GBW	09/30/19	0.50	279.00	139.50	Legal - Case Administration

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Attachment 1

Personnel	Item / Description	Date	Hours	Rate	Amount	Activity Category
Hall, John	Review requests and provide additional information to RI	09/30/19	0.80	279.00	223.20	Legal - Case Administration
Winkler, Carrie	Verify/match wire transfers	09/30/19	3.70	175.00	647.50	Financial - Accounting/Auditing
Winkler, Geoffrey	Pull documents for counsel (.4), review motion, discuss with JH (.5), call with counsel to discuss motion (.3), follow up with KM re call (.1), post new documents to website and email (.5)	09/30/19	1.80	315.00	567.00	Legal - Case Administration
			Totals	<u>563.1</u>	<u>\$ 151,808.70</u>	

SEC v. Essex Capital Corporation
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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	4.4	279.00	\$ 1,227.60	
Financial - Accounting/Auditing	Paterson, Caroline	A&M	50.7	225.00	\$ 11,407.50	
Financial - Accounting/Auditing	Winkler, Carrie	A&M	56.1	175.00	\$ 9,817.50	
			<u>111.2</u>		<u>\$ 22,452.60</u>	
Financial - Business Analysis	Personnel	Firm	Hours	Rate	Amount	
Financial - Business Analysis	Hall, John	A&M	2.7	279.00	\$ 753.30	
			<u>2.7</u>		<u>\$ 753.30</u>	
Financial - Corporate Finance	Personnel	Firm	Hours	Rate	Amount	
Financial - Corporate Finance	Hall, John	A&M	8.1	279.00	\$ 2,259.90	
			<u>8.1</u>		<u>\$ 2,259.90</u>	
Financial - Data Analysis						
Financial - Data Analysis	Hall, John	A&M	23.8	279.00	\$ 6,640.20	
			<u>23.8</u>		<u>6,640.2</u>	
Financial - Forensic Accounting	Personnel	Firm	Hours	Rate	Amount	
Financial - Forensic Accounting	Hall, John	A&M	204.7	279.00	\$ 57,111.30	
			<u>204.7</u>		<u>\$ 57,111.30</u>	
Legal - Asset Disposition	Personnel	Firm	Hours	Rate	Amount	
Legal - Asset Disposition	Hall, John	A&M	0.8	279.00	\$ 223.20	
			<u>0.8</u>		<u>\$ 223.20</u>	
Legal - Business Operations	Personnel	Firm	Hours	Rate	Amount	
Legal - Business Operations	Hall, John	A&M	33.0	279.00	\$ 9,207.00	
			<u>33.0</u>		<u>\$ 9,207.00</u>	
Legal - Case Administration	Personnel	Firm	Hours	Rate	Amount	
Legal - Case Administration	Hall, John	A&M	87.8	279.00	\$ 24,496.20	
Legal - Case Administration	Winkler, Geoffrey	A&M	91.0	315.00	\$ 28,665.00	
			<u>178.8</u>		<u>\$ 53,161.20</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
 July 1, 2019 - September 30, 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	
	Hall, John	A&M	365.3	279.00	\$ 101,918.70	
	Paterson, Caroline	A&M	50.7	225.00	\$ 11,407.50	
	Winkler, Carrie	A&M	56.1	175.00	\$ 9,817.50	
	Winkler, Geoffrey	A&M	91.0	315.00	\$ 28,665.00	
			<u>563.1</u>		<u>\$ 151,808.70</u>	
	TOTAL FEES				\$ 151,808.70	

SEC v. Essex Capital Corporation
Summary of Expenses of Receiver and Retained Personnel
July 1, 2019 - September 30, 2019

Attachment 2

Incurred By	Payee	Item / Description	Date Incurred	Amount	Category
Hall, John	Quickbooks	License Fees: Ongoing operational need	07/12/19	70.00	Miscellaneous
Hall, John	City of Portland	Parking: Move Essex boxes to office	08/01/19	14.50	Parking
Winkler, Geoffrey	Gogo	Internet/Online Fees: Internet inflight	08/04/19	49.95	Internet/Online Fees
Hall, John	Quickbooks	License Fees: Monthly company QB charge	08/12/19	70.00	Miscellaneous
Hall, John	Quickbooks	License Fees: Monthly license fee for QB Online	08/13/19	70.00	Miscellaneous
Hall, John	CA SOS	Miscellaneous: Fee to release UCC filing on lease	08/19/19	25.00	Miscellaneous
Winkler, Geoffrey	Alaska Airlines	Airfare: airfare to hearing	08/21/19	427.61	Airfare
Winkler, Geoffrey	Westin	Hotel: essex hearing	08/21/19	264.54	Hotel
Winkler, Geoffrey	Lyft	Taxi: from airport to hotel	08/21/19	49.70	Taxi
Winkler, Geoffrey	Port of Portland	Parking: parking	08/22/19	48.00	Parking
Winkler, Geoffrey	Geoff Winkler	Personal Car Mileage: trip to airport	08/22/19	77.72	Personal Car Mileage
Winkler, Geoffrey	Lyft	Taxi: trip to airport	08/22/19	33.23	Taxi
Winkler, Geoffrey	FedEx	FedEx- August. 2019 1 of 7	08/30/19	43.65	Courier/Shipping/Freight
Winkler, Geoffrey	FedEx	FedEx- August. 2019 2 of 7	08/30/19	48.14	Courier/Shipping/Freight
Winkler, Geoffrey	FedEx	FedEx- August. 2019 3 of 7	08/30/19	53.76	Courier/Shipping/Freight
Winkler, Geoffrey	FedEx	FedEx- August. 2019 4 of 7	08/30/19	63.84	Courier/Shipping/Freight
Winkler, Geoffrey	FedEx	FedEx- August. 2019 5 of 7	08/30/19	73.92	Courier/Shipping/Freight
Winkler, Geoffrey	FedEx	FedEx- August. 2019 6 of 7	08/30/19	73.92	Courier/Shipping/Freight
Winkler, Geoffrey	FedEx	FedEx- August. 2019 7 of 7	08/30/19	77.94	Courier/Shipping/Freight
Hall, John	Quickbooks	License Fees: Monthly license fee for QB Online	09/12/19	70.00	Miscellaneous

Total \$ 1,705.42

Preliminary Billing Form

Billing Atty: 001842 - Joshua Del Castillo

Matter #: 378224-00002

Matter Name: General Receivership

Date of Last Billing: 09-17-2019

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

Proforma Number 1443137

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
07/08/19	7915646	Confer with counsel regarding case administration issues.	Aspis, Norman	0.3	121.50	121.50	WO HD TR_____
07/26/19	7907133	Attention to case administration matters and confer with Receiver's office re same (0.9).	Del Castillo, Joshua	0.9	534.60	656.10	WO HD TR_____
08/05/19	7917538	Attention to case administration matters and confer with counsel and Receiver's office re same (0.6).	Del Castillo, Joshua	0.6	356.40	1,012.50	WO HD TR_____
08/12/19	7924695	Attention to case administration matters and confer with counsel and Receiver's office re same (0.5); confer with SEC and Receiver re stipulated consent and judgment and attention to issues re same (0.5).	Del Castillo, Joshua	1.0	594.00	1,606.50	WO HD TR_____
08/13/19	7928067	Review/evaluate the draft stipulated judgment (.3). Email with counsel and call to address the tax issues, court order re hearing report (.3).	Zaro, David	0.6	472.50	2,079.00	WO HD TR_____
08/13/19	7926092	Confer with Receiver's office, execute Essex consent, and transmit executed consent to SEC for filing (0.3); attend to urgent case	Del Castillo, Joshua	1.0	594.00	2,673.00	WO HD TR_____

Trans Date	Index	Description of Service Rendered	Timekeeper	Hours	Fees	Sum	Circle	Action
		administration matters and confer with Receiver's office re same (0.7).						
08/20/19	7931921	Attention to case administration matters, review documents, and prepare materials for status conference (0.6).	Del Castillo, Joshua	0.6	356.40	3,029.40	WO	HD TR_____
08/21/19	7933153	E-mails and teleconferences with Receiver's office and counsel re case administration matters and upcoming status conference (1.1); assemble materials in connection with same (0.9).	Del Castillo, Joshua	2.0	1,188.00	4,217.40	WO	HD TR_____
08/22/19	7934279	Prepare for status conference with Receiver and attend status conference (2.1); confer with Receiver and SEC re case administration matters (0.4).	Del Castillo, Joshua	2.5	1,485.00	5,702.40	WO	HD TR_____
08/22/19	7944243	Prepare for and participate in client meeting and case management conference before Judge Olguin.	Aspis, Norman	1.0	405.00	6,107.40	WO	HD TR_____
08/26/19	7936400	Attention to case management matters and confer re same (0.5); confer re permanent injunction, review documents, and transmit e-mail to SEC re same (0.3).	Del Castillo, Joshua	0.8	475.20	6,582.60	WO	HD TR_____
08/27/19	7939401	Review, evaluate and revise draft permanent injunction order, strategy (.6). Conference with counsel to address the preliminary injunction order/accounting issues (.2).	Zaro, David	0.8	630.00	7,212.60	WO	HD TR_____
08/27/19	7938031	Confer re proposed permanent injunction, review documents and notes, and prepare draft permanent	Del Castillo, Joshua	3.5	2,079.00	9,291.60	WO	HD TR_____

Trans Date	Index	Description of Service Rendered	Timekeeper	Hours	Fees	Sum	Circle	Action
		injunction (2.5); e-mails and teleconferences with SEC and counsel re case administration, proposed injunction, and Court's order re stipulation on injunction (1.0).						
08/28/19	7938846	E-mails and teleconferences with Receiver's office re draft injunction and case administration matters (1.0).	Del Castillo, Joshua	1.0	594.00	9,885.60	WO	HD TR_____
08/30/19	7942100	Review and respond to e-mails and teleconferences from Defendant's counsel and SEC re permanent injunction and proposed revisions to same (0.5); confer with Receiver's office and counsel re same (0.6).	Del Castillo, Joshua	1.1	653.40	10,539.00	WO	HD TR_____
09/03/19	7946771	E-mails and teleconferences with Receiver's office and counsel and attention to case administration issues (0.5); teleconferences and e-mails with SEC and Receiver re permanent injunction and stipulation re same, including proposed revisions (1.3).	Del Castillo, Joshua	1.8	1,069.20	11,608.20	WO	HD TR_____
09/03/19	7973904	Attention to issues in connection with proposed order regarding permanent injunction (.2).	Aspis, Norman	0.2	81.00	11,689.20	WO	HD TR_____
09/09/19	7951249	E-mails with Receiver's office and counsel re case administration matters (0.5).	Del Castillo, Joshua	0.5	297.00	11,986.20	WO	HD TR_____
09/10/19	7953526	Review e-mail from D. Cousineau re threatened CVL intervention, review CVL-related records, and e-mails and teleconference with SEC re intervention issues (1.1).	Del Castillo, Joshua	1.1	653.40	12,639.60	WO	HD TR_____

Trans Date	Index	Description of Service Rendered	Timekeeper	Hours	Fees	Sum	Circle	Action
09/11/19	7953643	Review additional documents in connection with threatened CVL intervention, correspondence re same, and analysis for prospective opposition to intervention (1.5).	Del Castillo, Joshua	1.5	891.00	13,530.60	WO	HD TR_____
09/12/19	7955381	Prepare for and meet and confer call with CVL re threatened intervention (1.0).	Del Castillo, Joshua	1.0	594.00	14,124.60	WO	HD TR_____
09/16/19	7959547	Analysis of the CVL issues and strategy, email and call with counsel, advice to Receiver.	Zaro, David	0.6	472.50	14,597.10	WO	HD TR_____
09/16/19	7958234	E-mails and teleconferences re threatened CVL intervention and assemble and transmit materials requested (0.8); analysis of issues in connection with anticipated opposition (0.8).	Del Castillo, Joshua	1.6	950.40	15,547.50	WO	HD TR_____
09/18/19	7961620	E-mails re proposed CVL intervention (0.3).	Del Castillo, Joshua	0.3	178.20	15,725.70	WO	HD TR_____
09/19/19	7963618	E-mails and teleconferences re threatened CVL intervention and alternatives to same (0.8); review and respond to voicemails and e-mails from counsel (0.3).	Del Castillo, Joshua	1.1	653.40	16,379.10	WO	HD TR_____
09/20/19	7964168	E-mails re threatened CVL intervention (0.5).	Del Castillo, Joshua	0.5	297.00	16,676.10	WO	HD TR_____
09/23/19	7965652	Review documents, identify necessary redactions, and assemble in connection with threatened CVL intervention (1.0); legal analysis of Court's authority to include CVL in scope of receivership and confer with	Del Castillo, Joshua	1.9	1,128.60	17,804.70	WO	HD TR_____

Trans Date	Index	Description of Service Rendered	Timekeeper	Hours	Fees	Sum	Circle	Action
		counsel re same (0.9).						
09/24/19	7966680	Assemble documents and prepare correspondence and production to Iannelli and CVL counsel re threatened intervention and Receiver's outstanding turnover demand (1.3).	Del Castillo, Joshua	1.3	772.20	18,576.90	WO	HD TR_____
09/25/19	7967933	Review CVL motion to intervene and prepare outline for opposition to same (0.7); confer with counsel and Receiver re same (0.5).	Del Castillo, Joshua	1.2	712.80	19,289.70	WO	HD TR_____
09/25/19	7975041	Put together binder of pleadings on CVL's motion to remove assets.	Lopez, George	0.3	87.75	19,377.45	WO	HD TR_____
09/27/19	7970830	Review materials and prepare draft Opposition to CVL Motion to Intervene (3.4); teleconference with SEC (0.1).	Del Castillo, Joshua	3.5	2,079.00	21,456.45	WO	HD TR_____
09/28/19	7973338	Analysis of CVL intervention motion, follow-up to advise counsel concerning the Receiver's response (.4).	Zaro, David	0.4	315.00	21,771.45	WO	HD TR_____
09/28/19	7972228	Substantially revise and expand opposition to CVL motion to intervene (1.1).	Del Castillo, Joshua	1.1	653.40	22,424.85	WO	HD TR_____
09/29/19	7972232	E-mails with SEC and Receiver re threatened CVL intervention and Iannelli request for continuance (0.5); review and assemble exhibits to Winkler declaration (0.9); prepare Winkler declaration (0.4).	Del Castillo, Joshua	1.8	1,069.20	23,494.05	WO	HD TR_____
09/29/19	7973877	Analyze draft opposition to intervention and transmit certain	Aspis, Norman	0.2	81.00	23,575.05	WO	HD TR_____

Trans Date	Index	Description of Service Rendered	Timekeeper	Hours	Fees	Sum	Circle	Action
		promissory notes as exhibits to declaration of G. Winkler (0.2).						
09/30/19	7975861	Emails/advice t counsel concerning CVL, response to proposals, intervention and actions against CVL.	Zaro, David	0.4	315.00	23,890.05	WO HD	TR_____
09/30/19	7972251	Finalize and assemble materials for filing of Opposition to CVL motion to intervene (1.9); e-mails and teleconferences re same (0.6); e-mails with Iannelli and CVL counsel (0.3).	Del Castillo, Joshua	2.8	1,663.20	25,553.25	WO HD	TR_____

Disbursements for Matter 378224-00002 (General Receivership)

Trans Date	Index	Type	Quantity	Amt	Circle	Action
07/16/19	2546793	Text Editing ^Create/Edit/Revise Word Documents USER DEFINED 1: 002369	0.50	15.00	WO HD	TR_____
08/14/19	2548978	Duplication	218.00	41.42	WO HD	TR_____
08/15/19	2548979	Duplication	1.00	0.19	WO HD	TR_____
08/15/19	2552206	Messenger - - Nationwide Legal, LLC, USDC CENTRAL DISTRICT, DELIVER COURTESY^197228	1.00	21.00	WO HD	TR_____
08/27/19	2553722	Messenger -- Federal Express Invoice No: 672344341 1842 Ship To:	1.00	12.67	WO HD	TR_____
09/06/19	2561923	Messenger - - Nationwide Legal, LLC, USDC CENTRAL DISTRICT, DELIVER COURTESY^198732	1.00	23.00	WO HD	TR_____
09/25/19	2560975	Reprographics - Color	1.00	0.25	WO HD	TR_____

Proforma Summary

Timekeeper Number	Timekeeper	Hours	Rate	Amounts
000313	David Zaro	2.8	787.50	2,205.00
001842	Joshua Del Castillo	38.0	594.00	22,572.00
001928	George Lopez	0.3	292.50	87.75
002369	Norman Aspis	1.7	405.00	688.50
		42.8		25,553.25
Total Fees				25,553.25
Total Disbursements				113.53

Attorney Billing Instructions

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

Billing Instructions

expires 6/30/2020: 10% off standard rates (automatic)

Account Summary- As Of 09/30/2019

	Fiscal YTD			Calendar YTD			LTD		
	Total	Fees	Disbursement	Total	Fees	Disbursement	Total	Fees	Disbursement
Worked	52,572.05	47,526.07	5,045.98	52,462.65	47,526.07	4,936.58	52,462.65	47,526.07	4,936.58
Unbilled Adj	(5,631.97)	(5,631.97)	0.00	(7,170.97)	(7,170.97)	0.00	(7,170.97)	(7,170.97)	0.00
Billed	17,856.40	13,033.35	4,823.05	17,856.40	13,033.35	4,823.05	17,856.40	13,033.35	4,823.05
Collected	17,856.40	13,033.35	4,823.05	17,856.40	13,033.35	4,823.05	17,856.40	13,033.35	4,823.05
AR Write Off	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00
	Total	Fees	Cost						
<i>WIP Balance</i>	33,822.53	31,962.60	1,859.93						
<i>AR Balance</i>	0.00	0.00	0.00						
<i>Unalloc Payment</i>	0.00								
<i>Client Trust Balance</i>	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 #: 378224-00003

Matter Name: Asset Recovery & Management

Date of Last Billing: 09-17-2019

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

Proforma Number 1443138

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
07/01/19	7888548	Analysis of the issues concerning the Amangasset assets, recovery of Essex loan and prospective settlement with partners (.4).	Zaro, David	0.4	315.00	315.00	WO HD	TR_____
07/02/19	7888576	Conference with counsel as to CVL loan and follow-up with advice to counsel as to collection strategy (.3).	Zaro, David	0.3	236.25	551.25	WO HD	TR_____
07/03/19	7888594	Review appraisals and attention to asset recovery matters (0.6).	Del Castillo, Joshua	0.6	356.40	907.65	WO HD	TR_____
07/09/19	7891324	Confer with counsel and Receiver's office re asset recovery matters (0.7); review e-mail from CVL counsel (0.1).	Del Castillo, Joshua	0.8	475.20	1,382.85	WO HD	TR_____
07/10/19	7894287	Analysis of the legal/factual issues concerning the S.C. asset sale, tax authority claims (.4). follow-up emails with counsel to address response to CVL and claims for recovery of loan proceeds, emails related to CVL/Essex/lannelli (.9).	Zaro, David	1.3	1,023.75	2,406.60	WO HD	TR_____
07/10/19	7894026	Review documents, confer with counsel, and e-mails re asset recovery issues (2.4).	Del Castillo, Joshua	2.4	1,425.60	3,832.20	WO HD	TR_____

Trans Date	Index	Description of Service Rendered	Timekeeper	Hours	Fees	Sum	Circle	Action
07/11/19	7895410	Review documents and attention to asset recovery issues (3.1).	Del Castillo, Joshua	3.1	1,841.40	5,673.60	WO	HD TR_____
07/12/19	7896738	Analysis of prospective targets for assets recovery/documents and advice to counsel (.4).	Zaro, David	0.4	315.00	5,988.60	WO	HD TR_____
07/15/19	7896239	E-mails with Receiver and J. de Neve re turnover of CVL interest and other asset recovery matters (0.7); teleconferences re same (0.3).	Del Castillo, Joshua	1.0	594.00	6,582.60	WO	HD TR_____
07/15/19	7915231	Confer with counsel regarding assignment of Iannelli's interest in CVL.	Aspis, Norman	0.4	162.00	6,744.60	WO	HD TR_____
07/18/19	7901287	Analysis of the issues and the emails to counsel/claimant counsel as to Amangasett and related parties claims and cross-claims (.2). Work with counsel/emails regarding accounting to support recovery of assets (.4).	Zaro, David	0.6	472.50	7,217.10	WO	HD TR_____
07/24/19	7904798	Review and respond to correspondence from J. de Neve and R. Iannelli re Defendanant Iannelli's demand for reimbursement from Receiver and confer with Receiver's office re same (0.3).	Del Castillo, Joshua	0.3	178.20	7,395.30	WO	HD TR_____
07/24/19	7905659	Review documents, confer with counsel, and attention to asset recovery issues, including CVL turnover and debt enforcement matters (1.7).	Del Castillo, Joshua	1.7	1,009.80	8,405.10	WO	HD TR_____
07/30/19	7911420	Emails with counsel for insider investor concerning turnover of	Zaro, David	0.3	236.25	8,641.35	WO	HD TR_____

Trans Date	Index	Description of Service Rendered	Timekeeper	Hours	Fees	Sum	Circle	Action
		assets/settlement (.3).						
08/13/19	7928061	Emails related to the CVL claims and CVL interests, Receiver demands for recovery (.4). Analysis of CVL counsel's claims and legal research concerning the issues (.7).	Zaro, David	1.1	866.25	9,507.60	WO	HD TR_____
08/13/19	7925893	E-mails, teleconferences, and confer with counsel re outstanding asset recovery efforts (1.0); review documents and e-mails re same (0.6); prepare e-mail to J. de Neve re status of CVL assignment (0.1).	Del Castillo, Joshua	1.7	1,009.80	10,517.40	WO	HD TR_____
08/14/19	7928575	Emails/legal advice as to several residual lease transactions (.4). Call with counsel for Receiver, email with Grant/Perry counsel (.3).	Zaro, David	0.7	551.25	11,068.65	WO	HD TR_____
08/14/19	7928083	Review and respond to correspondence re asset recovery and preservation matters and review materials provided by Receiver's office re same (1.1).	Del Castillo, Joshua	1.1	653.40	11,722.05	WO	HD TR_____
08/15/19	7929466	Legal analysis and review of grant claim and dispute as to net winner versus claimants, strategy (.4). Review of Receiver accounting and documents related to the grant claims and analysis of grant accounting (.6). Prepare for and attend conference call with Receiver and counsel related to the accounting (1.6).	Zaro, David	2.6	2,047.50	13,769.55	WO	HD TR_____
08/15/19	7928294	E-mails with counsel for MBT re administration Essex accounts (0.3); confer with Receiver's office re same	Del Castillo, Joshua	0.5	297.00	14,066.55	WO	HD TR_____

Trans Date	Index	Description of Service Rendered	Timekeeper	Hours	Fees	Sum	Circle	Action
		(0.2).						
08/16/19	7933070	Further evaluation of schedules and analysis of the accounting for possible net winner or claimants Grant/Perry, draft email to counsel (.8). Emails/calls with counsel/Receiver and Mr. Hall as to the analysis/advice (.6).	Zaro, David	1.4	1,102.50	15,169.05	WO	HD TR_____
08/16/19	7929534	Legal analysis of prospective asset recovery claims, review associated documents, and confer with counsel re same (3.8).	Del Castillo, Joshua	3.8	2,257.20	17,426.25	WO	HD TR_____
08/18/19	7930434	Attention to prospective disgorgement actions and review accounting analysis and notes re same (1.5).	Del Castillo, Joshua	1.5	891.00	18,317.25	WO	HD TR_____
08/19/19	7930421	Review documents and confer with counsel re necessary research and analysis of issues in connection with prospective asset recovery claims (1.0); review and respond to e-mail from MBT counsel re late fees and confer with Receiver's office re same (0.2).	Del Castillo, Joshua	1.2	712.80	19,030.05	WO	HD TR_____
08/19/19	7930718	Strategy re potential actions against pre-receivership professionals (.4); begin conducting legal research in support of same (.2)	Engstrom, Alyssa	0.6	243.00	19,273.05	WO	HD TR_____
08/19/19	7944695	Review correspondence regarding Amagansett; confer with counsel regarding the same (.4).	Aspis, Norman	0.4	162.00	19,435.05	WO	HD TR_____
08/19/19	7944739	Confer with counsel regarding MBT lease administration issues (.2).	Aspis, Norman	0.2	81.00	19,516.05	WO	HD TR_____

Trans Date	Index	Description of Service Rendered	Timekeeper	Hours	Fees	Sum	Circle	Action
08/20/19	7933119	Emails concerning recovery from Grant, accounting (.4). Email to counsel for CVL related to Essex loan (.6).	Zaro, David	1.0	787.50	20,303.55	WO	HD TR_____
08/20/19	7931871	E-mails and teleconferences re entity accounts maintained at MBT (0.8).	Del Castillo, Joshua	0.8	475.20	20,778.75	WO	HD TR_____
08/20/19	7932659	Extensive review of documents in connection with prospective disgorgement claims and correspondence re same (3.0).	Del Castillo, Joshua	3.0	1,782.00	22,560.75	WO	HD TR_____
08/20/19	7932421	Analysis of authorities re: scope of pre-receivership professionals duty to competently advise client	Engstrom, Alyssa	2.0	810.00	23,370.75	WO	HD TR_____
08/20/19	7944601	Review correspondence regarding certain lease buyout transaction; confer with counsel regarding the same and overall asset issues in anticipation of case management conference.	Aspis, Norman	0.4	162.00	23,532.75	WO	HD TR_____
08/21/19	7935056	Follow-up on the investigation, analysis of lease residuals, email to Receiver (.8). Email concerning grant claims/recovery as to \$3.0 million revenue versus investment, follow-up with counsel (.6). Call with Receiver to address the overall issues related to collection of residuals (.3).	Zaro, David	1.7	1,338.75	24,871.50	WO	HD TR_____
08/21/19	7933157	Prepare draft demand letters in connection with turnover requests (0.5); confer with counsel re anticipated disgorgement litigation strategy (0.6); review documents and legal analysis in connection with	Del Castillo, Joshua	1.9	1,128.60	26,000.10	WO	HD TR_____

Trans Date	Index	Description of Service Rendered	Timekeeper	Hours	Fees	Sum	Circle	Action
		same (0.8).						
08/21/19	7936782	Continue conducting research re potential claims against pre-receivership professionals	Engstrom, Alyssa	2.0	810.00	26,810.10	WO	HD TR_____
08/22/19	7935091	Review/revise the draft letter related to CVL interest, turnover demand by the Receiver and advice to counsel (.3). Follow-up with Receiver/counsel related to CVL records to establish funding sources for the purchase of Elm Street and the business (.4). Further analysis of the grant claims related to revenue, investment issues, conferences with Receiver and counsel (.7).	Zaro, David	1.4	1,102.50	27,912.60	WO	HD TR_____
08/23/19	7936735	Review email and call with counsel re assets, transferees of interest.	Zaro, David	0.4	315.00	28,227.60	WO	HD TR_____
08/23/19	7935292	Finalize turnover demand correspondence and send (1.0); review notes and attention to asset recovery matters (1.2).	Del Castillo, Joshua	2.2	1,306.80	29,534.40	WO	HD TR_____
08/23/19	7936328	Teleconferences and e-mails re outstanding asset recovery issues (0.9); review documents in connection with same (0.5).	Del Castillo, Joshua	1.4	831.60	30,366.00	WO	HD TR_____
08/23/19	7936824	Finish conducting research re: claims and strategy re: potential causes of action	Engstrom, Alyssa	2.1	850.50	31,216.50	WO	HD TR_____
08/26/19	7936497	E-mails with Receiver re apparent pending foreclosure of Penny Lane property (0.2).	Del Castillo, Joshua	0.2	118.80	31,335.30	WO	HD TR_____
08/26/19	7936816	Confer with counsel re results of legal	Del Castillo, Joshua	1.1	653.40	31,988.70	WO	HD TR_____

Trans Date	Index	Description of Service Rendered	Timekeeper	Hours	Fees	Sum	Circle	Action
		analysis in connection with additional asset recovery demands (0.5); review foreclosure notices and prepare to send associated cease and desist letters (0.6).						
08/26/19	7938278	Strategy re: potential theories of recovery against pre-receivership professionals (1.0); meeting re: research findings and next steps against pursuing claims (.4)	Engstrom, Alyssa	1.4	567.00	32,555.70	WO	HD TR_____
08/26/19	7944163	Confer with counsel regarding Iannelli primary residence (.2).	Aspis, Norman	0.2	81.00	32,636.70	WO	HD TR_____
08/27/19	7937824	Finalize cease and desist letter to Quality Loan Service and e-mails and teleconferences re same (1.0).	Del Castillo, Joshua	1.0	594.00	33,230.70	WO	HD TR_____
08/27/19	7944134	Confer with counsel regarding Iannelli primary residence.	Aspis, Norman	0.2	81.00	33,311.70	WO	HD TR_____
08/28/19	7942704	Analysis of grand records, email, assess the claims, Receiver response, disputed issues to review strategy for Grant, Perry and Wolansky claims and related interests.	Zaro, David	0.7	551.25	33,862.95	WO	HD TR_____
08/28/19	7939421	Confer with counsel re outstanding asset recovery issues (0.5).	Del Castillo, Joshua	0.5	297.00	34,159.95	WO	HD TR_____
08/28/19	7942824	Begin drafting memorandum analyzing potential causes of action against pre-receivership professionals	Engstrom, Alyssa	3.0	1,215.00	35,374.95	WO	HD TR_____
08/29/19	7942741	Analysis of Wolansky, Perry and Grant claim, prospective recoveries and prepare for conference call (.4). Call with Receiver and	Zaro, David	0.8	630.00	36,004.95	WO	HD TR_____

Trans Date	Index	Description of Service Rendered	Timekeeper	Hours	Fees	Sum	Circle	Action
		adviser/accountant concerning the recovery and claims related to the Perry, Wolansky, Perry and Grant related matters and assets (.4).						
08/29/19	7940653	Confer with counsel re asset recovery issues and review documents re same (0.8); e-mails with Receiver's office and third parties re same (0.5).	Del Castillo, Joshua	1.3	772.20	36,777.15	WO	HD TR_____
08/29/19	7941680	Confer with counsel and e-mails with Receiver's office re asset recovery strategies and outstanding issues (1.4).	Del Castillo, Joshua	1.4	831.60	37,608.75	WO	HD TR_____
08/29/19	7942746	Continue drafting memorandum re: potential theories of recovery against pre-receivership professionals	Engstrom, Alyssa	1.5	607.50	38,216.25	WO	HD TR_____
08/30/19	7942628	Confer with counsel re pending asset recovery issues (0.7).	Del Castillo, Joshua	0.7	415.80	38,632.05	WO	HD TR_____
08/30/19	7943309	Confer with counsel regarding Amagansett and CVL (.3).	Aspis, Norman	0.3	121.50	38,753.55	WO	HD TR_____
08/31/19	7945839	Review CVL related materials and memorandum re related claims (1.1); e-mails inquiries to counsel (0.5); e-mails re asset turnover issues (0.5).	Del Castillo, Joshua	2.1	1,247.40	40,000.95	WO	HD TR_____
09/02/19	7946696	Analysis of issues raised in several emails concerning the CVL matter, advice concerning meeting with Iannelli (.4).	Zaro, David	0.4	315.00	40,315.95	WO	HD TR_____
09/03/19	7948391	Conference with Receiver concerning R. Iannelli's turnover of assets (.4). Research analysis of the legal issues concerning the turnover of assets, the net-winner analysis and the facts	Zaro, David	1.9	1,496.25	41,812.20	WO	HD TR_____

Trans Date	Index	Description of Service Rendered	Timekeeper	Hours	Fees	Sum	Circle	Action
		concerning Grant's mimosa partnership and Perry's intent (1.5).						
09/03/19	7948719	Review and respond to e-mail re rescission of Penny Lane foreclosure and update Receiver re same (0.2); review and respond to e-mails re CVL demand (0.2).	Del Castillo, Joshua	0.4	237.60	42,049.80	WO	HD TR_____
09/03/19	7948030	Strategy re: pursuing claims against pre-receivership professionals and research in support of same	Engstrom, Alyssa	1.0	405.00	42,454.80	WO	HD TR_____
09/04/19	7950074	Several emails/communication with Receiver related to the subpoenas, discovery as to possible net winners (.3). Work on drafts of subpoenas, advice to counsel (.6). Emails with Perry/Grant counsel (.2).	Zaro, David	1.1	866.25	43,321.05	WO	HD TR_____
09/04/19	7948733	Review and respond to correspondence re asset turnover matters and teleconferences re same (1.5).	Del Castillo, Joshua	1.5	891.00	44,212.05	WO	HD TR_____
09/05/19	7949318	Continue conducting legal research re: scope of attorney-client privilege; conduct legal research re: definition of "tortious act" under cause of action for aiding and abetting breach of fiduciary duty (1.5).	Engstrom, Alyssa	1.5	607.50	44,819.55	WO	HD TR_____
09/10/19	7954805	Several emails/analysis of accounting to assess the rights to recover as to net winners (.3)	Zaro, David	0.3	236.25	45,055.80	WO	HD TR_____
09/12/19	7959487	Further analysis/meeting with counsel concerning recovery of assets from net winners, accounting and strategy (.5). Conference as to CVL strategy,	Zaro, David	0.9	708.75	45,764.55	WO	HD TR_____

Trans Date	Index	Description of Service Rendered	Timekeeper	Hours	Fees	Sum	Circle	Action
		letter to counsel, follow-up emails with counsel re legal advice as to next steps (.4).						
09/12/19	7955821	Prepare demand letters for asset turnover (1.1); confer with counsel re prospective net winner disgorgement issues and review documents in connection with same (0.6).	Del Castillo, Joshua	1.7	1,009.80	46,774.35	WO	HD TR_____
09/13/19	7957832	Review and respond to correspondence relating to and attention to asset recovery and buyout matters and review documents re same (1.5).	Del Castillo, Joshua	1.5	891.00	47,665.35	WO	HD TR_____
09/16/19	7959023	Confer with counsel regarding CVL plans and review correspondence regarding CVL's request for intervention (.3); review correspondence regarding Neos Therapeutics intent to exercise a purchase option (.1).	Aspis, Norman	0.4	162.00	47,827.35	WO	HD TR_____
09/17/19	7962712	Email related to Giddy lease, follow-up with Receiver (.2). Call/email related to the Novasom matter/BK issues and advice to counsel (.1).	Zaro, David	0.3	236.25	48,063.60	WO	HD TR_____
09/17/19	7959535	Review and respond to e-mails re lease buyout and confer with counsel re same (0.3); review and confer re prospective Receivership reimbursement claims and related matters (1.4); e-mails re same (0.4).	Del Castillo, Joshua	2.1	1,247.40	49,311.00	WO	HD TR_____
09/17/19	7960796	Finish conducting legal research re: privilege over entity and individual representation and aiding and abetting breach of fiduciary duty and	Engstrom, Alyssa	1.5	607.50	49,918.50	WO	HD TR_____

Trans Date	Index	Description of Service Rendered	Timekeeper	Hours	Fees	Sum	Circle	Action
		update memorandum to client re: potential causes of action against pre-receivership professionals.						
09/18/19	7962719	Follow-up with counsel, advice as to CVL and collection action against CVL on notes and intervention issues (.4). Analysis of further information as to the Giddy lease, related documents to address residual returns, value analysis and conference call with Receiver (.6). Follow-up on the giddy non-disclosure agreement, revise draft form (.5).	Zaro, David	1.5	1,181.25	51,099.75	WO	HD TR_____
09/18/19	7961466	E-mails and teleconferences re asset turnover and recovery matters, including as to CVL interest and notes, and prospective disgorgement claims (1.5); review proposed revisions to NDA (0.2).	Del Castillo, Joshua	1.7	1,009.80	52,109.55	WO	HD TR_____
09/19/19	7966565	Emails/analysis as to Perry accounting, assess next steps (.3). Email with counsel re Iannelli's CVL interests (.1).	Zaro, David	0.4	315.00	52,424.55	WO	HD TR_____
09/20/19	7967024	Emails concerning the SEC/CVL intervention issues, discovery and Receiver's claims to recover CVL debt, equity interests (.4).	Zaro, David	0.4	315.00	52,739.55	WO	HD TR_____
09/20/19	7964166	Teleconference with K. Yopp re CVL interest turnover demand and review documents in connection with same (0.5); confer with counsel re same (0.5).; e-mails with Receiver re document request relating to CVL turnover demand (0.2).	Del Castillo, Joshua	1.2	712.80	53,452.35	WO	HD TR_____

Trans Date	Index	Description of Service Rendered	Timekeeper	Hours	Fees	Sum	Circle	Action
09/20/19	7964141	Confer with counsel regarding strategy to enforce the CVL notes and review correspondence regarding the same (.4).	Aspis, Norman	0.4	162.00	53,614.35	WO	HD TR_____
09/23/19	7967473	Analysis of additional accounting records and documents concerning the recovery firm net winners (.3).	Zaro, David	0.3	236.25	53,850.60	WO	HD TR_____
09/23/19	7965283	Review documents in connection with receivership's interest in CVL entity and e-mails and teleconferences re same (1.5).	Del Castillo, Joshua	1.5	891.00	54,741.60	WO	HD TR_____
09/23/19	7965516	Review transaction records underlying CVL (.4); confer with counsel regarding the same (0.2).	Aspis, Norman	0.6	243.00	54,984.60	WO	HD TR_____
09/24/19	7967928	Emails/advice to counsel as to legal issues associated with CVL, the loans, related transactions and strategy (.6). Emails with counsel for Grant/Perry/Wolonsky (.3).	Zaro, David	0.9	708.75	55,693.35	WO	HD TR_____
09/24/19	7966683	Confer with counsel and Receiver re anticipated asset recovery litigation (1.3); review documents and legal analysis in connection with same (1.9).	Del Castillo, Joshua	3.2	1,900.80	57,594.15	WO	HD TR_____
09/25/19	7968337	Confer with counsel regarding jurisdictional issues in connection with CVL (.2); review jurisdictional basis for commencing action in connection with CVL and draft email regarding the same (.5).	Aspis, Norman	0.7	283.50	57,877.65	WO	HD TR_____
09/26/19	7972840	Analysis of additional accounting data related to MIMO calculations, the status of negotiations and assess	Zaro, David	1.6	1,260.00	59,137.65	WO	HD TR_____

Trans Date	Index	Description of Service Rendered	Timekeeper	Hours	Fees	Sum	Circle Action
		settlement positions as to disputed recovery (.8). Attend conference with Mr. Napoli concerning MIMO/claims and settlement (.4). emails/meeting concerning the recovery of net winner proceeds (.4).					
09/26/19	7970278	E-mails and teleconferences re disgorgement strategy and associated accounting matters (0.9); review and respond to correspondence re CVL financials (0.2).	Del Castillo, Joshua	1.1	653.40	59,791.05	WO HD TR_____
09/30/19	7975613	Review and assemble materials relating to CVL transactions, confer with counsel, and commence preparation of motion to initiate collections action (2.5).	Del Castillo, Joshua	2.5	1,485.00	61,276.05	WO HD TR_____

Proforma Summary

Timekeeper Number	Timekeeper	Hours	Rate	Amounts
000313	David Zaro	25.1	787.50	19,766.25
001842	Joshua Del Castillo	55.7	594.00	33,085.80
002243	Alyssa Engstrom	16.6	405.00	6,723.00
002369	Norman Aspis	4.2	405.00	1,701.00
		101.6		61,276.05
Total Fees				61,276.05
Total Disbursements				0.00

Attorney Billing Instructions

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

Billing Instructions

expires 6/30/2020: 10% off standard rates (automatic)

Account Summary- As Of 09/30/2019

	Fiscal YTD			Calendar YTD			LTD		
	Total	Fees	Disbursement	Total	Fees	Disbursement	Total	Fees	Disbursement
Worked	157,452.39	157,452.39	0.00	157,452.39	157,452.39	0.00	157,452.39	157,452.39	0.00
Unbilled Adj	(11,445.30)	(11,445.30)	0.00	(14,143.05)	(14,143.05)	0.00	(14,143.05)	(14,143.05)	0.00
Billed	75,551.04	75,551.04	0.00	75,551.04	75,551.04	0.00	75,551.04	75,551.04	0.00
Collected	75,551.04	75,551.04	0.00	75,551.04	75,551.04	0.00	75,551.04	75,551.04	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						
<i>WIP Balance</i>	120,943.80	120,943.80	0.00						
<i>AR Balance</i>	0.00	0.00	0.00						
<i>Unalloc Payment</i>	0.00								
<i>Client Trust Balance</i>	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: 09-17-2019

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

Proforma Number 1443139

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
07/01/19	7913679	Confer with representative from Fifth Third Bank regarding subpoena and production.	Aspis, Norman	0.5	202.50	202.50	WO HD TR_____
07/02/19	7887611	Confer with SEC re accounting and asset recovery questions (0.2); confer with counsel re same (0.5); attention to interim reporting matters (0.7); attention to outstanding discovery matters and confer with counsel for B. Iannelli re outstanding document request (0.6).	Del Castillo, Joshua	2.0	1,188.00	1,390.50	WO HD TR_____
07/03/19	7888496	Attention to interim reporting and accounting issues and prepare inquiries re same (0.5); review notes and documents forwarded by Receiver (0.5).	Del Castillo, Joshua	1.0	594.00	1,984.50	WO HD TR_____
07/05/19	7913736	Confer with M&T Bank regarding subpoena status.	Aspis, Norman	0.2	81.00	2,065.50	WO HD TR_____
07/08/19	7891105	Follow-up on the Receiver's accounting and report/investigation of the open issues (.4).	Zaro, David	0.4	315.00	2,380.50	WO HD TR_____
07/08/19	7890173	Confer with counsel re interim report and e-mails with Receiver re same	Del Castillo, Joshua	0.5	297.00	2,677.50	WO HD TR_____

Exhibit B
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Trans Date	Index	Description of Service Rendered	Timekeeper	Hours	Fees	Sum	Circle	Action
		(0.5).						
07/09/19	7892889	Follow-up advice as to accounting issues, address response to claimants and reporting issues, meeting with counsel (.4). Analysis of lease issues and follow-up with counsel re same (.3).	Zaro, David	0.7	551.25	3,228.75	WO	HD TR_____
07/09/19	7891323	Prepare for and teleconference with Receiver's office re status of accounting, reporting issues, and associated matters (1.0).	Del Castillo, Joshua	1.0	594.00	3,822.75	WO	HD TR_____
07/09/19	7891140	Prepare for and attend weekly status call regarding accounting.	Aspis, Norman	0.9	364.50	4,187.25	WO	HD TR_____
07/10/19	7894068	E-mails with SEC and Receiver re accounting and asset recovery matters (0.5).	Del Castillo, Joshua	0.5	297.00	4,484.25	WO	HD TR_____
07/11/19	7915557	Review correspondence from AMEX regarding its response to a subpoena (.2).	Aspis, Norman	0.2	81.00	4,565.25	WO	HD TR_____
07/12/19	7895406	Prepare for and teleconferences with SEC and Receiver re Receiver's investigation and asset recovery efforts (1.0); confer with counsel re outstanding discovery and forensic accounting matters (0.6).	Del Castillo, Joshua	1.6	950.40	5,515.65	WO	HD TR_____
07/12/19	7915521	Confer with counsel regarding subpoenas (.3); confer with J. Hall regarding subpoenas (.3).	Aspis, Norman	0.6	243.00	5,758.65	WO	HD TR_____
07/15/19	7897117	Confer with counsel and Receiver's office re pending discovery, status of Interim Report and accounting, and related issues, and confer with	Del Castillo, Joshua	1.7	1,009.80	6,768.45	WO	HD TR_____

Trans Date	Index	Description of Service Rendered	Timekeeper	Hours	Fees	Sum	Circle	Action
		counsel re same (1.7).						
07/15/19	7915176	Confer with counsel and J. Hall regarding various financial institutions' productions in response to subpoenas (.6).	Aspis, Norman	0.6	243.00	7,011.45	WO	HD TR_____
07/16/19	7900289	Analysis/advice to counsel re Receiver's accounting to support recovery of assets (.4).	Zaro, David	0.4	315.00	7,326.45	WO	HD TR_____
07/16/19	7898624	E-mails and teleconferences with Receiver's office re accounting and reporting matters (0.7).	Del Castillo, Joshua	0.7	415.80	7,742.25	WO	HD TR_____
07/16/19	7898192	Review outstanding subpoena issues and correspond with financial institutions (1.1); confer with counsel regarding the same (.4); revise Second Interim Report (0.1).	Aspis, Norman	1.6	648.00	8,390.25	WO	HD TR_____
07/17/19	7914595	Revise Second Interim Report (1.0); confer with J. Kramer regarding Locke Lord fees (.1).	Aspis, Norman	1.0	405.00	8,795.25	WO	HD TR_____
07/19/19	7902275	E-mails with Receiver's office and counsel re interim report and accounting status and attention to issues re same (1.5).	Del Castillo, Joshua	1.5	891.00	9,686.25	WO	HD TR_____
07/22/19	7904535	Review/evaluate the email concerning accounting, work with counsel re report/analysis, advice to counsel re same (.7).	Zaro, David	0.7	551.25	10,237.50	WO	HD TR_____
07/22/19	7902742	E-mails with Receiver re accounting issues and confer with counsel re same (0.5).	Del Castillo, Joshua	0.5	297.00	10,534.50	WO	HD TR_____
07/23/19	7904477	Review and revise draft Second Interim Report and associated	Del Castillo, Joshua	1.8	1,069.20	11,603.70	WO	HD TR_____

Trans Date	Index	Description of Service Rendered	Timekeeper	Hours	Fees	Sum	Circle	Action
		materials and confer with counsel re same (1.8).						
07/23/19	7914135	Revise Second Interim Report (1.7); confer with counsel regarding the same (.4); review correspondence regarding First Republic Bank account and Citibank account and confer with counsel regarding the same (.3).	Aspis, Norman	2.6	1,053.00	12,656.70	WO	HD TR_____
07/24/19	7904925	E-mails with Receiver and counsel re interim report (0.5).	Del Castillo, Joshua	0.5	297.00	12,953.70	WO	HD TR_____
07/24/19	7914007	Confer with counsel regarding Essex QuickBooks (.3).	Aspis, Norman	0.3	121.50	13,075.20	WO	HD TR_____
07/25/19	7908892	Work on the Receiver's draft report/analysis of the accounting issues, follow-up/email with counsel (.7).	Zaro, David	0.7	551.25	13,626.45	WO	HD TR_____
07/25/19	7906138	Review and revise draft interim report and attention to reporting and accounting issues (1.4); teleconferences and e-mails re status of accounting and investigation with respect to profiting investors and related matters (1.0); e-mails and teleconferences re second QB acct (0.6).	Del Castillo, Joshua	3.0	1,782.00	15,408.45	WO	HD TR_____
07/25/19	7913241	Revise Second Interim Report (2.4); confer with counsel regarding QuickBooks (.2).	Aspis, Norman	2.6	1,053.00	16,461.45	WO	HD TR_____
07/26/19	7913157	Confer with counsel regarding accounting updates and Second Interim Report (.4); review correspondence regarding	Aspis, Norman	0.7	283.50	16,744.95	WO	HD TR_____

Trans Date	Index	Description of Service Rendered	Timekeeper	Hours	Fees	Sum	Circle	Action
		Cornerstone Essex and confer with counsel regarding the same (.3).						
07/26/19	7913824	Upload and review production from AMEX in response to subpoena (.3).	Aspis, Norman	0.3	121.50	16,866.45	WO	HD TR_____
07/30/19	7913022	Confer with J. Hall regarding additional subpoena requests (.1); confer with J. Kramer regarding Locke Lord fees in connection with Second Interim Report (.3).	Aspis, Norman	0.4	162.00	17,028.45	WO	HD TR_____
07/31/19	7914642	Emails with counsel related to the report (.2). Emails concerning the accounting/advice to counsel re subpoena (.2).	Zaro, David	0.4	315.00	17,343.45	WO	HD TR_____
08/06/19	7919205	Teleconference with Receiver's office re accounting and additional analysis re same (0.2); confer with counsel re additions to interim report (0.5); review accounting analysis summary provided by Receiver and attention to preparing narrative summary of same for interim report (2.0).	Del Castillo, Joshua	2.7	1,603.80	18,947.25	WO	HD TR_____
08/07/19	7922023	Review emails with counsel regarding accounting and analysis in support of Receiver's report, advice to counsel (.4).	Zaro, David	0.4	315.00	19,262.25	WO	HD TR_____
08/07/19	7920600	Review additional documents transmitted by Receiver and prepare additional sections for Second Interim Report (2.7); e-mails and teleconferences re same (0.5).	Del Castillo, Joshua	3.2	1,900.80	21,163.05	WO	HD TR_____
08/07/19	7946483	Review J. Hall and G. Winkler's edits to the second interim report (.2) revise the same (.3).	Aspis, Norman	0.5	202.50	21,365.55	WO	HD TR_____

Trans Date	Index	Description of Service Rendered	Timekeeper	Hours	Fees	Sum	Circle	Action
08/08/19	7925209	Work on revisions to report, follow-up conference with counsel, advice as to report and accounting (.6). Conference with counsel, advice re CVL/Amangasett accounting (.3).	Zaro, David	0.9	708.75	22,074.30	WO	HD TR_____
08/12/19	7924533	Review and respond to correspondence from Receiver's office re outstanding asset and document request and review efforts, confer with counsel re same, and prepare inquiries to third parties re same (1.5).	Del Castillo, Joshua	1.5	891.00	22,965.30	WO	HD TR_____
08/13/19	7925764	E-mails with Receiver's office and confer with counsel re accounting and disgorgement analysis matters (0.9); legal analysis of disgorgement issues (0.5); teleconference re same (0.5).	Del Castillo, Joshua	1.9	1,128.60	24,093.90	WO	HD TR_____
08/13/19	7945682	Review and finalize second interim report and petition for further instructions (1.1).	Aspis, Norman	1.1	445.50	24,539.40	WO	HD TR_____
08/14/19	7928091	E-mails re Receiver's accounting and related asset identification issues (0.5).	Del Castillo, Joshua	0.5	297.00	24,836.40	WO	HD TR_____
08/15/19	7929490	Call with Receiver related to the accounting, court report, address Wolansky claim and grant claim accounting (.2).	Zaro, David	0.2	157.50	24,993.90	WO	HD TR_____
08/15/19	7928295	E-mails and teleconference with counsel re accounting inquiries (0.5).; review and respond to correspondence from Receiver's office and third parties re outstanding information requests (0.7);	Del Castillo, Joshua	2.7	1,603.80	26,597.70	WO	HD TR_____

Trans Date	Index	Description of Service Rendered	Timekeeper	Hours	Fees	Sum	Circle	Action
		teleconference with Receiver re net winner accounting and follow-up correspondence re same (1.5).						
08/15/19	7945264	Confer with counsel regarding CVL and Amagansett; review documents regarding the same (1.1).	Aspis, Norman	1.1	445.50	27,043.20	WO	HD TR_____
08/16/19	7929406	Review and respond to e-mails from and confer with Receiver's office and counsel re forensic accounting re net winners (0.8).	Del Castillo, Joshua	0.8	475.20	27,518.40	WO	HD TR_____
08/19/19	7933080	Email to/from Mr. Grant's counsel related to accounting, follow-up with Mr. Winkler (.6). Work on the CVL research, investigation to address issues and develop strategy to pursue recovery (.6). Research/analysis of the lease documents, legal issues arising out of NovaSom lease residuals and leases, follow-up re possible bankruptcy issues (2.7).	Zaro, David	3.9	3,071.25	30,589.65	WO	HD TR_____
08/20/19	7933095	Investigate, research/analysis of the rescission issues, case law related to claims of CVL and draft research and strategy memorandum concerning Receiver interests (1.8). Call with counsel and Receiver, J. Hall, concerning CVL, the Grant claims investigation, analysis/investigation of NovaSom transaction issues (.6).	Zaro, David	2.4	1,890.00	32,479.65	WO	HD TR_____
08/20/19	7932673	Review and respond to document request matters and confer with counsel re same (0.3).	Del Castillo, Joshua	0.3	178.20	32,657.85	WO	HD TR_____
08/20/19	7944589	Review additional discovery requests for information; prepare and transmit	Aspis, Norman	0.9	364.50	33,022.35	WO	HD TR_____

Trans Date	Index	Description of Service Rendered	Timekeeper	Hours	Fees	Sum	Circle	Action
		requests to various financial institutions (.9).						
08/21/19	7944357	Confer with counsel regarding CVL and Amagansett (.6); perform follow-up discovery requests to various financial institutions (.9).	Aspis, Norman	1.5	607.50	33,629.85	WO	HD TR_____
08/26/19	7938953	Email/conferences with counsel related to the Receiver's accounting and report (.4). Advice to counsel related to third party action and cost/benefit analysis as to the recovery litigation (.3).	Zaro, David	0.7	551.25	34,181.10	WO	HD TR_____
08/27/19	7938147	Attention to document review issues and e-mails and teleconferences re same (1.2).	Del Castillo, Joshua	1.2	712.80	34,893.90	WO	HD TR_____
08/28/19	7942717	Email/advice to counsel related to the injunction order, the Receiver accounting as to third party claims.	Zaro, David	0.4	315.00	35,208.90	WO	HD TR_____
08/28/19	7939423	Confer with counsel and review documents in connection with Receiver's forensic accounting and conclusions arising therefrom (0.5).	Del Castillo, Joshua	0.5	297.00	35,505.90	WO	HD TR_____
08/30/19	7945332	Analysis of the issues and evaluate records concerning Perry investments, review and analysis of the transcript (.6). Follow-up on emails concerning the form of amended preliminary injunction order, advice to counsel re same (.3).	Zaro, David	0.9	708.75	36,214.65	WO	HD TR_____
08/30/19	7942633	E-mails with counsel re accounting analysis as relates to asset recovery and contemplated disgorgement matters (0.5); review documents re	Del Castillo, Joshua	1.0	594.00	36,808.65	WO	HD TR_____

Trans Date	Index	Description of Service Rendered	Timekeeper	Hours	Fees	Sum	Circle	Action
		same (0.5).						
09/04/19	7948746	Review and respond to correspondence re outstanding discovery and review documents re same (1.0).	Del Castillo, Joshua	1.0	594.00	37,402.65	WO	HD TR_____
09/04/19	7949262	Draft subpoenas to third-party individuals and confer with counsel regarding the same (0.6).	Aspis, Norman	0.6	243.00	37,645.65	WO	HD TR_____
09/05/19	7949895	Confer with counsel re systematic document review proposal and attention to outstanding discovery and accounting issues (1.0); review document inventories and prepare inquiries to counsel and Receiver's office re same (0.4).	Del Castillo, Joshua	1.3	772.20	38,417.85	WO	HD TR_____
09/06/19	7951124	Several emails/follow up on the accounting/reporting and clawback analysis and follow up thereon (.4).	Zaro, David	0.4	315.00	38,732.85	WO	HD TR_____
09/06/19	7950805	Attention to outstanding discovery requests (0.5).	Del Castillo, Joshua	0.5	297.00	39,029.85	WO	HD TR_____
09/09/19	7951253	E-mails and teleconferences with counsel re accounting issues and prepare inquiry to Receiver's office re same (0.4).	Del Castillo, Joshua	0.4	237.60	39,267.45	WO	HD TR_____
09/09/19	7957598	Review correspondence from Citibank and confer with J. Hall regarding the same (.3); review accounting relating to particular investor (.2).	Aspis, Norman	0.5	202.50	39,469.95	WO	HD TR_____
09/10/19	7952601	E-mails and teleconference re accounting and disgorgement analyses (0.4).	Del Castillo, Joshua	0.4	237.60	39,707.55	WO	HD TR_____

Trans Date	Index	Description of Service Rendered	Timekeeper	Hours	Fees	Sum	Circle	Action
09/11/19	7955334	Review Receiver's accounting of CVL transaction in connection with asset recovery investigation and anticipated opposition to CVL motion to intervene (1.2); e-mails and teleconferences re same (0.5).	Del Castillo, Joshua	1.7	1,009.80	40,717.35	WO	HD TR_____
09/12/19	7955380	Review net winners accounting and confer with counsel and Receiver's office re same (1.2).	Del Castillo, Joshua	1.2	712.80	41,430.15	WO	HD TR_____
09/16/19	7958236	Review and produce documents requested (0.4).	Del Castillo, Joshua	0.4	237.60	41,667.75	WO	HD TR_____
09/17/19	7959530	Review documents and notes and prepare demand letter to Seed Mackall re CVL (1.1).	Del Castillo, Joshua	1.1	653.40	42,321.15	WO	HD TR_____
09/18/19	7961412	Attention to discovery matters, prepare subpoenas, and correspondence re same (1.5).	Del Castillo, Joshua	1.5	891.00	43,212.15	WO	HD TR_____
09/18/19	7962378	Confer with counsel regarding investments by, and payouts to, W. Reyner.	Aspis, Norman	0.2	81.00	43,293.15	WO	HD TR_____
09/20/19	7968729	Conference with counsel and analysis of Perry legal/account, analysis/emails with Receiver and accountant.	Zaro, David	0.4	315.00	43,608.15	WO	HD TR_____
09/23/19	7965486	Teleconference and e-mails with P. Umoff re Seed Mackall subpoena and related matters (0.5).	Del Castillo, Joshua	0.5	297.00	43,905.15	WO	HD TR_____
09/24/19	7967753	Attention to outstanding subpoena issues and review correspondence in connection with same (0.6); provide updates re same (0.4).	Del Castillo, Joshua	1.0	594.00	44,499.15	WO	HD TR_____

Trans Date	Index	Description of Service Rendered	Timekeeper	Hours	Fees	Sum	Circle Action
09/24/19	7968462	Confer with counsel regarding subpoena to Seed Mackall in connection with CVL (.2).	Aspis, Norman	0.2	81.00	44,580.15	WO HD TR_____
09/27/19	7973243	Email/analysis of accounting issues related to disputed claims and email to clients/accountant as to strategy/legal issues (.4).	Zaro, David	0.4	315.00	44,895.15	WO HD TR_____

Disbursements for Matter 378224-00004 (Investigation/Reporting)

Trans Date	Index	Type	Quantity	Amt	Circle Action
08/13/19	2549510	Text Editing ^TOC/TOA Generation USER DEFINED 1: 002369	1.70	51.00	WO HD TR_____

Proforma Summary

Timekeeper Number	Timekeeper	Hours	Rate	Amounts
000313	David Zaro	14.3	787.50	11,261.25
001842	Joshua Del Castillo	43.6	594.00	25,898.40
002369	Norman Aspis	19.1	405.00	7,735.50
		77.0		44,895.15
Total Fees				44,895.15
Total Disbursements				51.00

Attorney Billing Instructions

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

Billing Instructions

expires 6/30/2020: 10% off standard rates (automatic)

Account Summary- As Of 09/30/2019

	Fiscal YTD			Calendar YTD			LTD		
	Total	Fees	Disbursement	Total	Fees	Disbursement	Total	Fees	Disbursement
Worked	155,297.52	155,130.30	167.22	155,297.52	155,130.30	167.22	155,297.52	155,130.30	167.22
Unbilled Adj	(15,329.85)	(15,262.65)	(67.20)	(16,772.10)	(16,704.90)	(67.20)	(16,772.10)	(16,704.90)	(67.20)
Billed	90,026.97	89,977.95	49.02	90,026.97	89,977.95	49.02	90,026.97	89,977.95	49.02
Collected	90,026.97	89,977.95	49.02	90,026.97	89,977.95	49.02	90,026.97	89,977.95	49.02
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	53,974.95	53,923.95	51.00						
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 #: 378224-00006

Matter Name: Sale/Disposition/Transfer of Assets

Date of Last Billing: 09-17-2019

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

Proforma Number 1443140

Client/Matter Joint Group # 378224-1

Fees for Matter 378224-00006 (Sale/Disposition/Transfer of Assets)

Trans Date	Index	Description of Service Rendered	Timekeeper	Hours	Fees	Sum	Circle	Action
08/20/19	7931870	E-mails with Receiver's office re pending asset sale issues (0.5).	Del Castillo, Joshua	0.5	297.00	297.00	WO	HD TR_____
09/18/19	7961413	Review and respond to correspondence and inquiries re asset sale matters (0.5); confer with counsel re same (0.5).	Del Castillo, Joshua	1.0	594.00	891.00	WO	HD TR_____
09/25/19	7967936	Review and respond to correspondence re sale of receivership assets (0.5); e-mails and teleconferences with Receiver and counsel re same (0.6); review Novasom bankruptcy dockets in connection with prospective asset sale and prepare update to Receiver re same (0.5).	Del Castillo, Joshua	1.6	950.40	1,841.40	WO	HD TR_____
09/26/19	7970264	E-mails with Receiver and MBY counsel re asset disposition issues (0.5).	Del Castillo, Joshua	0.5	297.00	2,138.40	WO	HD TR_____

Proforma Summary

Timekeeper Number	Timekeeper	Hours	Rate	Amounts
001842	Joshua Del Castillo	3.6	594.00	2,138.40

	3.6	2,138.40
Total Fees		2,138.40
Total Disbursements		0.00

Attorney Billing Instructions

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

Billing Instructions

expires 6/30/2020: 10% off standard rates (automatic)

Account Summary- As Of 09/30/2019

	Fiscal YTD			Calendar YTD			LTD		
	Total	Fees	Disbursement	Total	Fees	Disbursement	Total	Fees	Disbursement
Worked	4,748.40	4,748.40	0.00	4,748.40	4,748.40	0.00	4,748.40	4,748.40	0.00
Unbilled Adj	(135.00)	(135.00)	0.00	(135.00)	(135.00)	0.00	(135.00)	(135.00)	0.00
Billed	2,475.00	2,475.00	0.00	2,475.00	2,475.00	0.00	2,475.00	2,475.00	0.00
Collected	2,475.00	2,475.00	0.00	2,475.00	2,475.00	0.00	2,475.00	2,475.00	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	15,149.70	15,149.70	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: 09-17-2019

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

Proforma Number 1443141

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
07/12/19	7895408	Attention to pending litigation matters (0.5); review and comment on Gabler case management statement (0.3).	Del Castillo, Joshua	0.8	475.20	475.20	WO	HD TR_____
07/12/19	7915486	Draft CMS for Gabler matter (.4); confer with counsel regarding the same(.1); transmit for filing (.1).	Aspis, Norman	0.6	243.00	718.20	WO	HD TR_____
07/23/19	7914195	Calendar case management conference in Dennis v. Iannelli.	Aspis, Norman	0.2	81.00	799.20	WO	HD TR_____
07/26/19	7907134	Attention to pending litigation matters and confer with counsel and Receiver's office re same (0.7).	Del Castillo, Joshua	0.7	415.80	1,215.00	WO	HD TR_____
07/29/19	7912657	Prepare for and participate in Gabler v. Essex case management conference.	Aspis, Norman	1.5	607.50	1,822.50	WO	HD TR_____
07/29/19	7913098	Draft CMS for Dennis v. Iannelli (.4).	Aspis, Norman	0.4	162.00	1,984.50	WO	HD TR_____
08/02/19	7946505	Prepare for and participate in case management conference in the Dennis matter.	Aspis, Norman	0.9	364.50	2,349.00	WO	HD TR_____
08/07/19	7920717	Review materials from Locke Lord in connection with the Garipalli action and attention to other pending litigation issues (1.5); correspondence	Del Castillo, Joshua	2.0	1,188.00	3,537.00	WO	HD TR_____

Trans Date	Index	Description of Service Rendered	Timekeeper	Hours	Fees	Sum	Circle	Action
		re same (0.5).						
08/07/19	7946450	Confer with counsel regarding the Garipalli action.	Aspis, Norman	0.4	162.00	3,699.00	WO HD	TR_____
08/12/19	7924989	Teleconference with C. Howard re status and strategy for Garipalli litigation and prepare correspondence in connection with same (0.6).	Del Castillo, Joshua	0.6	356.40	4,055.40	WO HD	TR_____
08/22/19	7934285	Confer with Receiver and counsel re outstanding pending litigation issues (1.0); prepare e-mails to local counsel re same (0.2); review documents relating to pending litigation and prepare write-ups for same (1.5).	Del Castillo, Joshua	2.7	1,603.80	5,659.20	WO HD	TR_____
08/26/19	7936809	E-mails and teleconference with local counsel re pending Garipalli litigation issues (1.1); prepare update to Receiver re same (0.1).	Del Castillo, Joshua	1.2	712.80	6,372.00	WO HD	TR_____
09/04/19	7948743	Attention to outstanding pending litigation issues and confer with counsel re same (0.9).	Del Castillo, Joshua	0.9	534.60	6,906.60	WO HD	TR_____
09/06/19	7951234	Detailed review and analysis of pending litigation issues and prepare updated and memorandum for Receiver and counsel (3.0).	Del Castillo, Joshua	3.0	1,782.00	8,688.60	WO HD	TR_____
09/09/19	7951251	E-mails and voicemails with Locke Lord and Receiver re Garipalli litigation (0.3); confer with counsel re status of litigation and potential alternatives to status quo (0.5).	Del Castillo, Joshua	0.8	475.20	9,163.80	WO HD	TR_____
09/09/19	7957600	Confer with counsel regarding request for information to Locke Lord in connection with the Garipalli action (.4).	Aspis, Norman	0.4	162.00	9,325.80	WO HD	TR_____

Trans Date	Index	Description of Service Rendered	Timekeeper	Hours	Fees	Sum	Circle	Action
09/10/19	7953533	Confer with counsel re status of Garipalli litigation (0.3); e-mails with prospective local counsel (0.5); teleconference with Monitor (0.3).	Del Castillo, Joshua	1.1	653.40	9,979.20	WO	HD TR_____
09/10/19	7957579	Confer with counsel regarding Garipalli action and budget issues regarding the same (.4).	Aspis, Norman	0.4	162.00	10,141.20	WO	HD TR_____
09/10/19	7957582	Review Locke Lord strategy memorandum regarding Garpialli action (.3).	Aspis, Norman	0.3	121.50	10,262.70	WO	HD TR_____
09/11/19	7953796	E-mails with C. Howard and G. Winkler re Garipalli litigation (0.5).	Del Castillo, Joshua	0.5	297.00	10,559.70	WO	HD TR_____
09/11/19	7957451	Develop list of items to retrieve from Locke Lord in connection with discovery (.3).	Aspis, Norman	0.3	121.50	10,681.20	WO	HD TR_____
09/12/19	7956004	E-mails and voicemails re Garipalli litigation (0.5).	Del Castillo, Joshua	0.5	297.00	10,978.20	WO	HD TR_____
09/13/19	7956842	Attention to pending litigation issues (0.7); teleconferences and e-mails with prospective local New York counsel (1.1).	Del Castillo, Joshua	1.8	1,069.20	12,047.40	WO	HD TR_____
09/14/19	7957841	Attention to pending litigation issues and legal analysis in connection with potential litigation claims by Receiver (1.5).	Del Castillo, Joshua	1.5	891.00	12,938.40	WO	HD TR_____
09/16/19	7958722	Teleconferences and e-mails with counsel re Garipalli litigation matter (1.5).	Del Castillo, Joshua	1.5	891.00	13,829.40	WO	HD TR_____
09/20/19	7964163	Teleconferences re Garipalli litigation (0.9).	Del Castillo, Joshua	0.9	534.60	14,364.00	WO	HD TR_____
09/20/19	7964144	Confer with counsel regarding	Aspis, Norman	0.2	81.00	14,445.00	WO	HD TR_____

Trans Date	Index	Description of Service Rendered	Timekeeper	Hours	Fees	Sum	Circle	Action
		Garipalli action and local counsel (.2).						
09/23/19	7967474	Email call with counsel as to third party litigation related to Garipalli	Zaro, David	0.3	236.25	14,681.25	WO HD	TR_____
09/24/19	7966685	E-mails and teleconferences re Garipalli litigation (1.5).	Del Castillo, Joshua	1.5	891.00	15,572.25	WO HD	TR_____
09/24/19	7968463	Case administration in connection with the Garipalli action (.3).	Aspis, Norman	0.3	121.50	15,693.75	WO HD	TR_____
09/26/19	7970283	E-mails re Garipalli litigation (0.5).	Del Castillo, Joshua	0.5	297.00	15,990.75	WO HD	TR_____
09/27/19	7970829	Prepare for and teleconference with Receiver and local counsel re Garipalli litigation (1.3).	Del Castillo, Joshua	1.3	772.20	16,762.95	WO HD	TR_____

Disbursements for Matter 378224-00007 (Pending Litigation)

Trans Date	Index	Type	Quantity	Amt	Circle	Action
07/12/19	2548462	Filing Fees - - Nationwide Legal, LLC, SANTA BARBARA SUPERIOR COURTHOUSE, CASE MANAGEMENT STATEMENT^195887	1.00	35.15	WO HD	TR_____
07/23/19	2545978	Telephonic Court Appearance - - CourtCall, LLC, Santa Barbara Superior Court - Judge Donna Geck - 8/2^9938850	1.00	94.00	WO HD	TR_____
07/29/19	2545977	Telephonic Court Appearance - - CourtCall, LLC, Santa Barbara Superior Court - Judge Colleen K. Sterne^9934298	1.00	124.00	WO HD	TR_____
07/29/19	2546158	Messenger -- Federal Express Invoice No: 663164273 2369 Ship To: Thomas Foley	1.00	12.72	WO HD	TR_____
07/29/19	2546159	Messenger -- Federal Express Invoice No: 663164273 2369 Ship To: Peter A Umoff	1.00	12.72	WO HD	TR_____
07/29/19	2552207	Filing Fees - - Nationwide Legal, LLC, SANTA BARBARA SUPERIOR COURTHOUSE, CASE MANAGEMENT STATEMENT^197228	1.00	35.15	WO HD	TR_____

Trans Date	Index	Type	Quantity	Amt	Circle	Action
07/29/19	2553889	Filing Fees - - Nationwide Legal, LLC, CASE MANAGEMENT STMT^196565	1.00	135.00	WO	HD TR_____
07/31/19	2545981	Telephonic Court Appearance - - CourtCall, LLC, Santa Barbara Superior Court - Judge Colleen K. Steme - 2/3/20^9957047	1.00	94.00	WO	HD TR_____

Proforma Summary

Timekeeper Number	Timekeeper	Hours	Rate	Amounts
000313	David Zaro	0.3	787.50	236.25
001842	Joshua Del Castillo	23.8	594.00	14,137.20
002369	Norman Aspis	5.9	405.00	2,389.50
		<u>30.0</u>		<u>16,762.95</u>
Total Fees				16,762.95
Total Disbursements				542.74

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 6/30/2020: 10% off standard rates (automatic)

Account Summary- As Of 09/30/2019

	Fiscal YTD			Calendar YTD			LTD		
	Total	Fees	Disbursement	Total	Fees	Disbursement	Total	Fees	Disbursement
Worked	54,722.19	53,781.75	940.44	54,651.89	53,781.75	870.14	54,651.89	53,781.75	870.14
Unbilled Adj	(3,954.60)	(3,954.60)	0.00	(4,878.00)	(4,878.00)	0.00	(4,878.00)	(4,878.00)	0.00
Billed	32,109.10	31,781.70	327.40	32,109.10	31,781.70	327.40	32,109.10	31,781.70	327.40
Collected	32,109.10	31,781.70	327.40	32,109.10	31,781.70	327.40	32,109.10	31,781.70	327.40
AR Write Off	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00

	<i>Total</i>	<i>Fees</i>	<i>Cost</i>
<i>WIP Balance</i>	58,832.24	58,219.20	613.04
<i>AR Balance</i>	0.00	0.00	0.00
<i>Unalloc Payment</i>	0.00		
<i>Client Trust Balance</i>	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 #: 378224-00008

Matter Name: Claims/Distribution

Date of Last Billing: 09-17-2019

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

Proforma Number 1443142

Client/Matter Joint Group # 378224-1

Fees for Matter 378224-00008 (Claims/Distribution)

Trans Date	Index	Description of Service Rendered	Timekeeper	Hours	Fees	Sum	Circle Action
07/18/19	7901286	Analysis of the issues and the emails to counsel and claimant counsel as to Amangasett/related parties claims and cross-claims (.2).	Zaro, David	0.2	157.50	157.50	WO HD TR_____
07/22/19	7902739	Legal analysis of constructive trust issues in connection with recovery of receivership assets and associated, anticipated distributions on allowed claims (2.5).	Del Castillo, Joshua	2.5	1,485.00	1,642.50	WO HD TR_____
08/01/19	7916228	Analysis of records and work on issues concerning the claims of Mr. Perry as to DIT, notes and Mr. Wolansky (.8). Prepare for/attend conference with counsel for Wolansky, Perry, Grant concerning claims and settlement (.6).	Zaro, David	1.4	1,102.50	2,745.00	WO HD TR_____
08/15/19	7929468	Legal analysis and review of grant claim and dispute as to net winner versus claimants, strategy.	Zaro, David	0.4	315.00	3,060.00	WO HD TR_____
08/16/19	7933071	Further evaluation of schedules and analysis of the accounting for possible net winner or claimants Grant/Perry, draft email to counsel (.8). Emails/calls with counsel/Receiver and Mr. Hall as to	Zaro, David	1.4	1,102.50	4,162.50	WO HD TR_____

Trans Date	Index	Description of Service Rendered	Timekeeper	Hours	Fees	Sum	Circle	Action
		the analysis/advice (.6).						
08/28/19	7942703	Analysis of grand records, email, assess the claims, Receiver response, disputed issues to review strategy for Grant, Perry and Wolansky claims and related interests.	Zaro, David	0.7	551.25	4,713.75	WO	HD TR_____
08/29/19	7942738	Analysis of Wolansky, Perry and Grant claim, prospective recoveries and prepare for conference call (.4). Call with Receiver and adviser/accountant concerning the recovery and claims related to the Perry, Wolansky, Perry and Grant related matters and assets (.4).	Zaro, David	0.8	630.00	5,343.75	WO	HD TR_____
09/09/19	7953042	Email related to accounting, analysis of claim, background as to investments, follow-up call with Receiver/accountant (.5). Email to counsel for claimant (.3).	Zaro, David	0.8	630.00	5,973.75	WO	HD TR_____
09/10/19	7954800	Email/call with counsel/receiver/SEC related to the litigation claim and issues as to third parties/net winners/CVL claim - note enforcement (.6).	Zaro, David	0.6	472.50	6,446.25	WO	HD TR_____
09/23/19	7967464	Several emails/conferences and analysis of the further records related to claims by Mr. Perry, CVL, and advice re next steps.	Zaro, David	0.7	551.25	6,997.50	WO	HD TR_____

Proforma Summary

Timekeeper Number	Timekeeper	Hours	Rate	Amounts
000313	David Zaro	7.0	787.50	5,512.50

Timekeeper Number	Timekeeper	Hours	Rate	Amounts
001842	Joshua Del Castillo	2.5	594.00	1,485.00
		<u>9.5</u>		<u>6,997.50</u>
Total Fees				6,997.50
Total Disbursements				0.00

Attorney Billing Instructions

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

Billing Instructions

expires 6/30/2020: 10% off standard rates (automatic)

Account Summary- As Of 09/30/2019

	Fiscal YTD			Calendar YTD			LTD		
	Total	Fees	Disbursement	Total	Fees	Disbursement	Total	Fees	Disbursement
Worked	14,051.25	14,051.25	0.00	14,051.25	14,051.25	0.00	14,051.25	14,051.25	0.00
Unbilled Adj	(1,858.50)	(1,858.50)	0.00	(1,858.50)	(1,858.50)	0.00	(1,858.50)	(1,858.50)	0.00
Billed	5,195.25	5,195.25	0.00	5,195.25	5,195.25	0.00	5,195.25	5,195.25	0.00
Collected	5,195.25	5,195.25	0.00	5,195.25	5,195.25	0.00	5,195.25	5,195.25	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	8,100.00	8,100.00	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



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 **January 9, 2020**, I caused to be served on all the parties to this action addressed as stated on the attached service list the document entitled: **THIRD INTERIM APPLICATION OF RECEIVER, GEOFF WINKLER, AND HIS PROFESSIONALS FOR PAYMENT OF FEES AND REIMBURSEMENT OF EXPENSES [July 1, 2019 – September 30, 2019]**.

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 **January 9, 2020** 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
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