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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

FIFTH INTERIM APPLICATION OF  
RECEIVER, GEOFF WINKLER, AND  
ALLEN MATKINS LECK GAMBLE  
MALLORY & NATSIS LLP, GENERAL  
COUNSEL TO THE RECEIVER, FOR  
PAYMENT OF FEES AND  
REIMBURSEMENT OF EXPENSES  
[January 1, 2020 - March 31, 2020]

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

Date: October 22, 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 and its subsidiaries and affiliates (collectively,  
4 the "Receivership Entities" or "Entities"), and his counsel of record, Allen Matkins  
5 Leck Gamble Mallory & Natsis LLP ("Allen Matkins"), hereby submit this Fifth  
6 Interim Application for Payment of Fees and Reimbursement of Expenses (the "Fee  
7 Application"). This Fee Application is the fifth interim application for payment of  
8 fees and reimbursement of expenses submitted in the above-referenced matter, and  
9 covers the period from January 1, 2020 through March 31, 2020 (the "Application  
10 Period").

11 By way of the Fee Application, the Receiver and Allen Matkins seek Court  
12 approval of 100% of their fees and expenses incurred during the Application Period  
13 and payment, on an interim basis, of 80% of their fees and 100% of their expenses  
14 incurred during the Application Period. The chart below indicates the requests of  
15 the Receiver and Allen Matkins by way of this Fee 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	\$131,848.20	\$752.96	\$105,478.56	\$5752.96
Allen Matkins	\$141,294.15	\$3,970.07	\$113,035.32	\$3,970.07
<b>TOTAL:</b>	<b>\$273,142.35</b>	<b>\$4,723.03</b>	<b>\$218,513.88</b>	<b>\$4,723.03</b>

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21 Consistent with the billing guidelines of the Plaintiff Securities and Exchange  
22 Commission (the "Commission") and the Receiver's and Allen Matkins'  
23 commitments for this federal receivership, the remaining, unpaid portion (20%), or  
24 "holdback," of the Receiver's and Allen Matkins' respective fees will be requested  
25 for payment at the conclusion of this receivership.

26 **II. GENERAL SUMMARY.**

27 As reflected in the Receiver's recently submitted Fifth Interim Report and  
28 Petition for Further Instructions (the "Fifth Interim Report") (ECF No. 174), during

1 the Application Period, and with assistance from Allen Matkins, the Receiver made  
2 substantial progress in satisfaction of his duties, as determined by the Court's  
3 December 21, 2018 Order Regarding Preliminary Injunction and Appointment of a  
4 Permanent Receiver (the "Appointment Order") (ECF No. 66), and its September 9,  
5 2019 Order Regarding Permanent Injunction (the "Permanent Injunction") (ECF  
6 No. 113). Among other things, the Receiver: (1) continued to analyze his  
7 anticipated approach to processing investor and creditor claims and developed a  
8 final recommendation regarding the treatment of all known claims;  
9 and (2) continued to execute his plan for recovering and maximizing receivership  
10 assets ("Receivership Assets" or "Assets"), including via the management of leases  
11 and the further evaluation of anticipated claims against third parties believed to be in  
12 wrongful possession of Receivership Assets, with a focus on his anticipated pursuit  
13 of disgorgement claims, as further detailed in the Fifth Interim Report.

14 A more detailed description of the work performed by the Receiver and Allen  
15 Matkins during the Application Period appears below, and in the Fifth Interim  
16 Report. Given the amount and nature of the work completed by the Receiver and  
17 Allen Matkins during the Application Period, they respectfully submit that the fees  
18 and expenses incurred during the Application Period are appropriate, and should be  
19 approved, and paid on interim basis, as indicated above. As an accommodation to  
20 the receivership estate (the "Estate"), and consistent with the Commission's billing  
21 guidelines and ordinary practice in federal receiverships, the Receiver and Allen  
22 Matkins request that the Court approve 100% of their fees and expenses incurred  
23 during the Application Period, but authorize payment, on an interim basis, of  
24 only 80% of their fees, and 100% of their expenses, at this time.

25 **III. SERVICES PERFORMED BY THE RECEIVER DURING THE**  
26 **APPLICATION PERIOD.**

27 During the Application Period, the Receiver diligently pursued the objectives  
28 established by this Court's Appointment Order, Order in Aid of Receivership (ECF

No. 69), and Permanent Injunction. To that end, the Receiver performed services recorded in the following categories, as reflected in the following summary:

<u>Receiver's Category</u>	<u>Hours Worked</u>	<u>Receiver's Fees</u>
Financial – Accounting/Auditing	0.5	\$139.50
Financial – Business Analysis	10.6	\$2,957.40
Financial – Corporate Finance	1.0	\$279.00
Financial – Data Analysis	15.4	\$4,296.60
Financial – Forensic Accounting	30.1	\$8,397.90
Financial – Litigation Consulting	32.3	\$9,011.70
Financial – Tax Issues	2.5	\$697.50
Legal – Asset Analysis and Recovery	13	\$3,627.00
Legal – Asset Disposition	16.4	\$4,795.20
Legal – Business Operations	40.8	\$11,383.20
Legal – Case Administration	159.9	\$45,476.10
Legal – Claims Administration and Objections	146.1	\$40,787.10
<b>TOTAL:</b>	<b>468.6</b>	<b>\$131,848.20</b>

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

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

During the Application Period, the Receiver devoted a limited amount of time to work within this category, which specifically involved reviewing certain K-1 tax forms for a private equity company, in which the Receivership Entities own certain shares as an investment.

**B. Financial – Business Analysis.**

During the Application Period, the Receiver devoted a limited amount of time to analyzing the Receivership Entities' private equity investments and other

1 investments, including ProCore, KF Leasing Partners, and Neos Therapeutics, Inc.  
2 The Receiver's work within this category involved gathering certain stock  
3 certificates and other financial documentation in connection with these Receivership  
4 Entity investments.

5 **C. Financial – Corporate Finance.**

6 During the Application Period, the Receiver's work within the Financial –  
7 Corporate Finance category was primarily devoted to reviewing the value of the  
8 Receivership Entities' various investments and developing an appropriate plan for  
9 the sale of or other disposition of certain of those Assets.

10 **D. Financial – Data Analysis.**

11 During the Application Period, the Receiver's work within this category was  
12 largely devoted to reviewing a report of wire transactions that was obtained via a  
13 subpoena issued to a third-party financial institution.

14 **E. Financial – Forensic Accounting.**

15 Having earlier completed his preliminary accounting of the business and  
16 financial activities of the Receivership Entities, during the Application Period, the  
17 Receiver devoted significant time to examining critical transactions in greater detail,  
18 including in connection with his investigation into the business and financial  
19 activities of the Receivership Entities and his pending efforts to recover available  
20 Assets. This review was also critical to the Receiver's preparation of his Forensic  
21 and Investigative Accounting Report (ECF No. 171), which provides a summary of  
22 his accounting conclusions, with presentations of data underlying specific actions  
23 undertaken by the Receivership Entities and their principal, Mr. Iannelli. The  
24 Forensic and Investigative Accounting Report was filed with this Court on  
25 June 11, 2020. Among other things, the Forensic and Investigative Accounting  
26 Report identifies the total amount of funds raised from investors and other sources,  
27 as well as their disposition, including: (1) significant diversion of Entity funds by  
28 Mr. Iannelli for apparently personal purposes unrelated to the Entities; (2) payments

1 of false profits to certain investors; and (3) use of funds obtained from later  
2 investors to pay obligations outstanding to earlier investors.

3 **F. Financial – Litigation Consulting.**

4 During the Application Period, the Receiver spent time within this category  
5 developing his claims against investors who appear to have profited from their  
6 investments in the Entities (the "Net Winners"). These Net Winners were identified  
7 through the Receiver's extensive money-in/money-out ("MIMO") accounting  
8 analysis. Having determined that it is appropriate to pursue disgorgement from the  
9 Net Winners, the Receiver conferred extensively with counsel and, through counsel,  
10 with the Commission, regarding his proposed procedures for pursuing  
11 disgorgements, including via demand letters, negotiation of settlement amounts and,  
12 if necessary, litigation. Ultimately, and in the hopes of minimizing costs while  
13 expediting his ability to proceed, with the Commission, the Receiver submitted a  
14 Stipulation to Authorize Receiver's Disgorgement Efforts and Establish  
15 Disgorgement Procedures (the "Disgorgement Stipulation") (ECF No. 157) on  
16 March 26, 2020. In addition, the Receiver devoted time within this category to  
17 preparing a Reply in support of the Disgorgement Stipulation. (See ECF No. 169.)  
18 The Receiver's detailed forensic accounting and work during the Application Period  
19 is expected to streamline his disgorgement efforts and should provide a strong  
20 incentive to the Net Winners to settle disgorgement claims without litigation.

21 **G. Financial – Tax Issues.**

22 During the Application Period, the Receiver devoted a limited amount of time  
23 to certain Receivership Entity tax issues.

24 **H. Legal – Asset Analysis and Recovery.**

25 During the Application Period, the Receiver devoted a limited amount of time  
26 to reviewing the data associated with his Asset identification and recovery efforts,  
27 including analyzing and performing certain valuations of Assets.

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1           **I.       Legal – Asset Disposition.**

2           During the Application Period, the Receiver spent time negotiating and  
3 arranging for the disposition of certain leased Assets and private equity investments,  
4 with the assistance of Allen Matkins.

5           **J.       Legal – Business Operations.**

6           During the Application Period, the Receiver and his staff devoted time to  
7 work within this category to address issues arising in connection with active leases  
8 and the buyout of leased Assets at their termination, as well as the sale of certain  
9 securities. To that end, the Receiver and his staff corresponded with various parties  
10 regarding the sale or buyout of Assets, and reviewed documents underlying the  
11 various transactions, including non-disclosure agreements, where applicable. In  
12 connection with these efforts, the Receiver communicated extensively with Allen  
13 Matkins regarding his administration of Assets pending their disposition out of  
14 receivership, and purchasers of those Assets in furtherance of sales beneficial to the  
15 Receivership Entities.

16           **K.       Legal – Case Administration.**

17           During the Application Period, the Receiver communicated extensively with  
18 Allen Matkins regarding his administration of the Receivership Entities and their  
19 Estate, along with the legal work required to enable the Receiver to undertake those  
20 efforts he deemed necessary, with particular attention to efforts regarding the  
21 marshalling and recovery of Receivership Assets. To that end, the Receiver  
22 conferred with Allen Matkins extensively regarding recovery strategies including,  
23 but not limited to, the Net Winners and the pursuit of 915 Elm Avenue CVL, LLC  
24 ("CVL"), by virtue of the Receiver's Motion for Authority to Pursue Litigation  
25 Against 915 Elm Avenue CVL, LLC and associated draft Complaint for Damages  
26 and Declaratory Relief (ECF No. 125). The Receiver also continued to coordinate  
27 with Montecito Bank & Trust ("MBT") to ensure that its processes for loan  
28 servicing including, but not limited to, MBT's preparation and production of

1 monthly reconciliations, and MBT's retention of loan payments and other funds,  
2 remain consistent with the fiduciary nature of the Receiver's appointment. During  
3 the Application Period, the Receiver also continued to administer all active  
4 equipment leases, and arranged buyouts of leased Assets at the termination of a  
5 number of leases.

6 The Receiver also prepared, with the assistance of Allen Matkins, the Fourth  
7 Interim Report and Petition for Further Instructions (the "Fourth Interim Report")  
8 (ECF No. 149), which involved compiling the exhibits thereto, in order to keep this  
9 Court apprised of the status of the instant receivership and all material developments  
10 in connection therewith. Within this category, the Receiver also devoted a relatively  
11 significant amount of time to preparing his Forensic and Investigative Accounting  
12 Report (ECF No. 171), which provides, among other things, a summary of his  
13 accounting conclusions, with presentations of data underlying specific actions  
14 undertaken by the Receivership Entities and their principal, Mr. Iannelli.

15 **L. Legal – Claims Administration and Objections.**

16 As previously reported to the Court, the Receiver's accounting analysis has  
17 facilitated his approach to processing anticipated investor and creditor claims  
18 against the Receivership Entities. Specifically, and on the basis of his MIMO, or  
19 netting accounting analysis, he has identified the amounts outstanding and owed by  
20 the Entities to an overwhelming majority of those investors and creditors who, on a  
21 MIMO basis, appear to have realized net losses from their investments in or  
22 contributions to the Entities.

23 In order to expedite the process of commencing his solicitation, review, and  
24 evaluation of investor and creditor claims, and after consultation with the  
25 Commission, the Receiver submitted the Stipulation for Order: (1) Establishing  
26 Claims Procedures; and (2) Setting Claims Bar Date (the "Claims Procedures  
27 Stipulation"), on April 20, 2020 (ECF No. 168). The Claims Procedures Stipulation  
28 is intended to establish the procedures whereby the Receiver will notify prospective

1 claimants of the claims process, invite the submission of claims against the  
2 Receivership Entities, evaluate timely claims on a MIMO basis, and address  
3 disputed claims, as well as to establish a bar date for the submission of claims.  
4 During the Application Period, the Receiver devoted a significant amount of time to  
5 reviewing investor data and creating various schedules for claimants, so that the  
6 Receiver will be able to commence an expedient and efficient claims process.

7 **IV. SERVICES PERFORMED BY ALLEN MATKINS DURING THE**  
8 **APPLICATION PERIOD.**

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

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

22 Detailed descriptions of the services rendered by Allen Matkins are contained  
23 in **Exhibit B**, attached hereto. Biographical information of the Allen Matkins  
24 attorneys who rendered significant services during the Application Period is  
25 attached hereto as **Exhibit C**. During the Application Period, Allen Matkins  
26 recorded its time in the following categories<sup>1</sup>:

27

28 <sup>1</sup> While Allen Matkins has made efforts to ensure that its billing entries are  
consistent across categories, certain activities lend themselves to more than one

1. General Receivership;
2. Asset Recovery & Management;
3. Investigation/Reporting;
4. Investor Issues/Communications;
5. Sale/Disposition/Transfer of Assets;
6. Pending Litigation;
7. Claims/Distribution; and
8. Third Party Claims & Recoveries.

**A. General Receivership.**

Services in the "General Receivership" category relate to assisting the Receiver in the administration of the Estate. During the Application Period, Allen Matkins attorneys addressed general case administration issues including, but not limited to, reviewing and responding to filings submitted by certain intervenors in the instant action. In addition, Allen Matkins attorneys devoted considerable effort to reviewing accounting data and transaction information relating to Amagansett Partners LLC ("Amagansett") and its associated investor, in an effort to secure a settlement with the investor in question.

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

<u>Name</u>	<u>Title</u>	<u>Hourly Rate</u>	<u>Hours</u>	<u>Fees</u>
J. del Castillo	Partner	\$594.00	29.5	\$17,523.00
T. Hsu	Senior Counsel	\$522.00	12.2	\$6,368.40
N. Aspis	Associate	\$405.00	0.2	\$81.00
<b>TOTAL:</b>			<b>41.9</b>	<b>\$23,972.40</b>
<b>Total Expenses:</b>				<b>\$3,408.77</b>

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           **B.     Asset Recovery & Management.**

2           Services in the "Asset Recovery & Management" category relate directly to  
3 the Receiver's efforts to identify, secure, preserve, and recover Receivership Assets.  
4 During the Application Period, Allen Matkins devoted a considerable amount of  
5 time in connection with these efforts, with a particular focus on the following Assets  
6 and potential recovery areas:

- 7           •     CVL: Allen Matkins attorneys provided significant assistance to the  
8 Receiver in connection with his pursuit, in accordance with the turnover  
9 provisions of the Appointment Order, to recover Receivership Entity funds  
10 invested in CVL and any CVL interest purchased therefrom.
- 11          •     Investor Claims: Allen Matkins attorneys spent time assisting the  
12 Receiver in his analysis of accounting issues with respect to one individual  
13 investor. In connection therewith, Allen Matkins attorneys reviewed relevant  
14 documents regarding this investor's transactions with Mr. Iannelli and the  
15 Receivership Entities, and his transactions in connection with Amagansett.  
16 Allen Matkins' efforts with respect to this investor culminated in the  
17 Receiver's Motion for Order Approving and Authorizing Performance of  
18 Settlement Agreement (ECF No. 172), filed on June 11, 2020, pursuant to  
19 which the Receiver is expected to receive a payment of \$150,000.00 from this  
20 investor, subject to Court approval.
- 21          •     Receivership Entity Leases and Private Equity Assets: Allen Matkins  
22 attorneys also assisted the Receiver in arranging certain buyouts of leased  
23 Assets at the termination of those leases and attended to matters relating to  
24 active equipment leases that the Receiver continues to administer. In  
25 addition, Allen Matkins assisted the Receiver with efforts to sell certain of the  
26 Receivership Entities' private equity investments.
- 27          •     Net Winners: Allen Matkins assisted the Receiver in his efforts to  
28 develop procedures for pursuing the Net Winners. These Net Winners were

1 identified via the Receiver's extensive MIMO accounting analysis. In the  
 2 hopes of minimizing costs while expediting the Receiver's ability to proceed  
 3 against the Net Winners, Allen Matkins prepared, in consultation with the  
 4 Commission and the Receiver, the Disgorgement Stipulation (ECF No. 157)  
 5 and the Reply in support thereof (ECF No. 169), the former of which sets  
 6 forth the Receiver's proposed procedures for pursuing Net Winners.

- 7 • Pre-Receivership Service Provider: Allen Matkins analyzed documents  
 8 and information relating to a potential claim against a pre-receivership service  
 9 provider for: (1) aiding and abetting breach of fiduciary duty; (2) breach of  
 10 fiduciary duty; and (3) professional negligence.

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

<u>Name</u>	<u>Title</u>	<u>Hourly Rate</u>	<u>Hours</u>	<u>Fees</u>
D. Zaro	Partner	\$787.50	5.3	\$4,173.75
J. del Castillo	Partner	\$594.00	48.7	\$28,927.80
N. Aspis	Associate	\$405.00	20.1	\$8,140.50
S. Kenney	Associate	\$301.50	18.6	\$5,607.90
<b>TOTAL:</b>			<b>92.7</b>	<b>\$46,849.95</b>
<b>Total Expenses:</b>				<b>\$24.00</b>

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19 **C. Investigation/Reporting.**

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

24 During the Application Period, Allen Matkins assisted the Receiver in  
 25 connection with the identification and review of documents relating to the  
 26 Receivership Entities and their business and financial activities, and with the  
 27 compilation and presentation of conclusions derived therefrom to the Court, in the  
 28 form of the Fourth Interim Report. This effort was comprised of, in part, continuing

1 execution of the Receiver's investigation and discovery plan, preparing and  
2 following up on subpoenas and document requests, and communicating with  
3 representatives of recipients of the Receiver's subpoenas and document requests.

4 Allen Matkins also devoted a limited amount of time within this category  
5 related to future disgorgement efforts against the Net Winners and the Receiver's  
6 Forensic and Investigative Accounting Report.

7 The following Allen Matkins attorneys and staff billed time to this matter  
8 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	3.6	\$2,835.00
J. del Castillo	Partner	\$594.00	10.3	\$6,118.20
T. Hsu	Senior Counsel	\$522.00	2.5	\$1,305.00
N. Aspis	Associate	\$405.00	11.8	\$4,779.00
<b>TOTAL:</b>			<b>28.2</b>	<b>\$15,037.20</b>
<b>Total Expenses:</b>				<b>\$0.00</b>

15 **D. Investor Issues/Communications.**

16 During the Application Period, Allen Matkins attorneys spent a limited  
17 amount of time providing services in this category, which included communicating  
18 directly with a Receivership Entity investor.

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>
D. Zaro	Partner	\$787.50	0.2	\$157.50
<b>TOTAL:</b>			<b>0.2</b>	<b>\$157.50</b>
<b>Total Expenses:</b>				<b>\$0.00</b>

25 **E. Sale/Disposition/Transfer of Assets.**

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

1 During the Application Period, Allen Matkins assisted the Receiver in the sale  
2 of Assets, particularly in connection with equipment under lease and the sale of  
3 certain private equity securities. In furtherance of these efforts, Allen Matkins  
4 attorneys reviewed documents related to the sale of Assets under lease and private  
5 equity securities being offered for sale. In addition, Allen Matkins prepared the  
6 Receiver's Motion for Order Approving Recommended Procedures for Sale of  
7 Personal Property Out of Receivership (ECF No. 151), pursuant to which the  
8 Receiver moved for an order authorizing and approving the Receiver's proposed  
9 sales procedures in connection with the Receiver's sale of the Entities' private equity  
10 investments and partnership or membership interests.

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

<u>Name</u>	<u>Title</u>	<u>Hourly Rate</u>	<u>Hours</u>	<u>Fees</u>
D. Zaro	Partner	\$787.50	3.7	\$2,913.75
J. del Castillo	Partner	\$594.00	12.2	\$7,246.80
N. Aspis	Associate	\$405.00	1.5	\$607.50
<b>TOTAL:</b>			<b>17.4</b>	<b>\$10,768.05</b>
<b>Total Expenses:</b>				<b>\$0.00</b>

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18 **F. Pending Litigation.**

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

26 During the Application Period, Allen Matkins also assisted the Receiver's  
27 efforts to settle the action styled Essex Capital Corp. v. Garipalli, et al., S.D.N.Y.  
28 Case No. 17-cv-06347 (the "Garipalli Action") including by, among other things:



1 (1) conferring with the Receiver's special litigation counsel for the Garipalli Action,  
2 Teitelbaum Law Group, LLC, regarding settlement strategy; and (2) ultimately  
3 negotiating a favorable settlement, as reflected in the Receiver's Motion for Order  
4 Approving Performance of Settlement Agreement and Release (the "Settlement  
5 Motion") (ECF No. 136). The Court approved the Settlement Motion (see ECF  
6 No. 159), pursuant to which the Receivership Entities recovered more than \$900,000  
7 in gross proceeds. Allen Matkins prepared and filed the Settlement Motion during  
8 the Application Period.

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

<u>Name</u>	<u>Title</u>	<u>Hourly Rate</u>	<u>Hours</u>	<u>Fees</u>
J. del Castillo	Partner	\$594.00	7.7	\$4,573.80
N. Aspis	Associate	\$405.00	2.7	\$1,093.50
S. Villagomez	Associate	\$369.00	1.0	\$369.00
<b>TOTAL:</b>			<b>11.4</b>	<b>\$6,036.30</b>
<b>Total Expenses:</b>				<b>\$537.30</b>

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16 **G. Claims/Distribution.**

17 During the Application Period, Allen Matkins attorneys devoted time on  
18 services in the "Claims/Distribution" category, which relate to the Receiver's efforts  
19 to identify and analyze claims, and the Receiver's eventual distribution efforts. In  
20 connection therewith, Allen Matkins, in consultation with the Receiver and the  
21 Commission, drafted the Claims Procedures Stipulation. The Claims Procedures  
22 Stipulation is intended to establish the procedures whereby the Receiver will notify  
23 prospective claimants of the claims process, invite the submission of claims against  
24 the Receivership Entities, evaluate timely claims on a MIMO basis, and address  
25 disputed claims, as well as to establish a bar date for the submission of claims.

26 In addition Allen Matkins attorneys assisted the Receiver with accounting  
27 issues and prospective collections issues. In connection therewith, Allen Matkins  
28 attorneys reviewed relevant documents regarding investor transactions with

1 Mr. Iannelli, the Receivership Entities, and another affiliated entity. Allen Matkins'  
 2 efforts with respect to this investor culminated in the Receiver's Motion for Order  
 3 Approving and Authorizing Performance of Settlement Agreement (ECF No. 172),  
 4 filed on June 11, 2020, pursuant to which the Receiver is expected to receive a  
 5 payment of \$150,000.00 from this investor, subject to Court approval.

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	18.6	\$14,647.50
J. del Castillo	Partner	\$594.00	15.0	\$8,910.00
N. Aspis	Associate	\$405.00	16.8	\$6,804.00
<b>TOTAL:</b>			<b>50.4</b>	<b>\$30,361.50</b>
<b>Total Expenses:</b>				<b>\$0.00</b>

13 **H. Third Party Claims & Recoveries.**

14 During the Application Period, Allen Matkins assisted the Receiver in his  
 15 efforts to develop his claims against the Net Winners, and analyze fraudulent  
 16 conveyance issues in connection therewith. Allen Matkins' efforts within this  
 17 category largely relate to the review and analysis of issues in connection with the  
 18 Disgorgement Stipulation (ECF No. 157) and the Reply in support thereof (ECF  
 19 No. 169), the former of which sets forth the Receiver's proposed procedures for  
 20 pursuing Net Winners, subject to Court approval.

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

<u>Name</u>	<u>Title</u>	<u>Hourly Rate</u>	<u>Hours</u>	<u>Fees</u>
D. Zaro	Partner	\$787.50	10.3	\$8,111.25
<b>TOTAL:</b>			<b>10.3</b>	<b>\$8,111.25</b>
<b>Total Expenses:</b>				<b>\$0.00</b>

1 **V. THE FEES AND EXPENSES INCURRED ARE REASONABLE AND**  
2 **SHOULD BE ALLOWED.**

3 The Receiver and Allen Matkins respectfully submit that the fees and  
4 expenses incurred during the Application Period were fair, reasonable, necessary,  
5 and significantly benefitted the Estate. Accordingly, as noted above, the Receiver  
6 and Allen Matkins request that the Court approve 100% of their respective fees and  
7 expenses as noted herein, and authorize the payments requested herein.

8 The billing rates charged by the Receiver and Allen Matkins in this matter are  
9 consistent with, and comparable to, those charged in the community on similarly  
10 complex matters. Further, and as described in the Memorandum of Points and  
11 Authorities submitted in support of this Fee Application, the billing statements of  
12 the Receiver and Allen Matkins were submitted to the Commission for review prior  
13 to the filing of this Fee Application. No objection to the Fee Application from the  
14 Commission is expected.

15 **VI. CONCLUSION.**

16 For the foregoing reasons, the Receiver and Allen Matkins respectfully  
17 request that the Court enter an order:

- 18 1. Granting the instant Fee Application, in its entirety;
- 19 2. Approving the Receiver's fees, in the amount of \$131,848.20, and  
20 expenses, in the amount of \$752.96;
- 21 3. Authorizing the Receiver to make an interim payment to himself in the  
22 amount of 80% of his fees, or \$105,478.56, and 100% of his expenses, in the  
23 amount of \$752.96, from the funds he presently holds for the administration and  
24 benefit of the Receivership Entities;
- 25 4. Approving Allen Matkins' fees, in the amount of \$141,294.15, and  
26 expenses, in the amount of \$3,970.07; and
- 27 5. Authorizing the Receiver to make an interim payment to Allen Matkins  
28 in the amount of 80% of its fees, or \$113,035.32, and 100% of its expenses, in the

1 amount of \$3,970.07, from the funds he presently holds for the administration and  
2 benefit of the Receivership Entities.

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Dated: September 18, 2020

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

By:           /s/          Norman M. Aspis            
NORMAN M. ASPIS  
Attorneys for Receiver  
GEOFF WINKLER

**SEC v. Essex Capital Corporation**  
**Summary of Fees of Receiver and Retained Personnel**  
**January 1, 2020 - March 31, 2020**  
**(Sorted in Chronological Order by Activity Category)**

Attachment 1

Personnel	Item / Description	Date	Hours	Rate	Amount	Activity Category
Hall, John	Third party accounting, review and scheduling for counsel	1/2/20	7.90	279.00	2,204.10	Financial - Litigation Consulting
Winkler, Geoffrey	Review, research, and update asset information for counsel (.4), update website information (.2)	1/2/20	0.60	315.00	189.00	Legal - Asset Disposition
Hall, John	Review buyout offer from GB, research terms of deal, make recommendation to GBW	1/2/20	0.60	279.00	167.40	Legal - Business Operations
Hall, John	Call from counsel regarding JPM production received	1/2/20	0.20	279.00	55.80	Legal - Case Administration
Hall, John	Intake, review and analysis of received wire transactions from JPM circa 43,800 transactions; Analysis and email results to GBW and counsel	1/3/20	7.50	279.00	2,092.50	Financial - Data Analysis
Hall, John	Review reports from UGI	1/6/20	0.20	279.00	55.80	Financial - Business Analysis
Hall, John	Create schedules and analysis for potential litigation	1/6/20	6.90	279.00	1,925.10	Financial - Litigation Consulting
Hall, John	Discuss outstanding case items with counsel, follow up call with Receiver	1/6/20	0.60	279.00	167.40	Legal - Case Administration
Hall, John	Review correspondence from counsel and research production items	1/6/20	0.30	279.00	83.70	Legal - Case Administration
Winkler, Geoffrey	Call with counsel and JBH (.4), call with JBH (.2), review accounts for payment and email to counsel (.2)	1/6/20	0.80	315.00	252.00	Legal - Case Administration
Hall, John	Create schedules and analysis for potential litigation	1/7/20	7.20	279.00	2,008.80	Financial - Litigation Consulting
Hall, John	Affected investor FAQ	1/7/20	0.20	279.00	55.80	Legal - Case Administration
Hall, John	Review CS issues, and draft and send letter requesting meeting to TM	1/7/20	0.60	279.00	167.40	Legal - Case Administration
Winkler, Geoffrey	Update website with recent filings (.5), emails with investor's counsel (.2)	1/7/20	0.70	315.00	220.50	Legal - Case Administration
Hall, John	Review PC offer and research current value	1/8/20	0.50	279.00	139.50	Financial - Business Analysis
Hall, John	Create schedules and analysis for potential litigation	1/8/20	5.40	279.00	1,506.60	Financial - Litigation Consulting
Hall, John	Review NS agreement to determine need for further steps including lien release	1/8/20	0.40	279.00	111.60	Legal - Asset Disposition
Winkler, Geoffrey	Review reports and emails with counsel (.2), emails with counsel re payment (.1), call with investor (.2)	1/8/20	0.50	315.00	157.50	Legal - Case Administration
Hall, John	Creating claims schedules for mimo claimants	1/8/20	2.00	279.00	558.00	Legal - Claims Administration and Objections
Hall, John	Creating claims schedules for mimo claimants	1/9/20	4.20	279.00	1,171.80	Legal - Claims Administration and Objections
Winkler, Geoffrey	Review analysis from counsel (.3)	1/9/20	0.30	315.00	94.50	Legal - Claims Administration and Objections
Hall, John	Review of counsel's GG analysis	1/10/20	0.50	279.00	139.50	Financial - Data Analysis
Hall, John	Review revised motion to sell assets and confer with GBW	1/10/20	0.40	279.00	111.60	Legal - Case Administration
Hall, John	Review and comment on reply ISO motion to lift stay and declaration	1/10/20	0.80	279.00	223.20	Legal - Case Administration
Hall, John	Creating claims schedules for mimo claimants	1/10/20	1.50	279.00	418.50	Legal - Claims Administration and Objections
Hall, John	Creating claims schedules for mimo claimants	1/10/20	2.80	279.00	781.20	Legal - Claims Administration and Objections
Hall, John	Preparation for CS discussion with CFO and in house counsel	1/12/20	1.10	279.00	306.90	Legal - Case Administration
Hall, John	Research investments, memo to GBW	1/13/20	0.50	279.00	139.50	Financial - Business Analysis
Hall, John	Review correspondence from NT regarding lease buyout; review lease and sales tax issues; follow up with HG to determine final sale amount; confirm sales tax amount and responsibility; creating and submitting invoice for payment	1/13/20	0.60	279.00	167.40	Legal - Business Operations
Hall, John	Memo to CS to commemorate discussion and request additional items and reports	1/13/20	0.50	279.00	139.50	Legal - Business Operations
Hall, John	Review amended operating agreement and exhibits provided by counsel, research issues, response to inquiry from counsel	1/13/20	1.60	279.00	446.40	Legal - Business Operations
Hall, John	Conference call with CS; follow along discussion with GBW	1/13/20	0.70	279.00	195.30	Legal - Case Administration
Hall, John	Discuss outstanding AM issues with counsel JDC and TH	1/13/20	0.50	279.00	139.50	Legal - Case Administration
Hall, John	Discuss outstanding issues on two calls with GBW	1/13/20	0.30	279.00	83.70	Legal - Case Administration
Hall, John	Review memo from JDC	1/13/20	0.20	279.00	55.80	Legal - Case Administration

**SEC v. Essex Capital Corporation**  
**Summary of Fees of Receiver and Retained Personnel**  
**January 1, 2020 - March 31, 2020**  
**(Sorted in Chronological Order by Activity Category)**

Personnel	Item / Description	Date	Hours	Rate	Amount	Activity Category
Winkler, Geoffrey	Call with interested party re transactions with Essex (.4), call with JBH to discuss (.3), review email and analysis from counsel (.2)	1/13/20	0.90	315.00	283.50	Legal - Case Administration
Hall, John	Review correspondence from Asst Controller of NEOS regarding lease buyout; review lease and sales tax issues; follow up with HG to determine final sale amount; confirm sales tax amount and responsibility; creating and submitting invoice to NEOS A/P for payment	1/14/20	1.50	279.00	418.50	Legal - Business Operations
Hall, John	Discuss outstanding issues with GBW	1/14/20	0.20	279.00	55.80	Legal - Case Administration
Hall, John	Memo to counsel clarifying KC issues	1/14/20	0.20	279.00	55.80	Legal - Case Administration
Hall, John	Affected investor FAQ	1/14/20	0.20	279.00	55.80	Legal - Case Administration
Hall, John	Review counsel questions, research, and memo to team regarding amended operating agreement, private equity valuations, and KC lease transfers	1/14/20	1.20	279.00	334.80	Legal - Case Administration
Hall, John	Review CS issues; memo to counsel demonstrating payments, prepare for reaching out to financial institutions for additional information	1/14/20	0.80	279.00	223.20	Legal - Case Administration
Hall, John	MIMO claim accounting and schedule making	1/14/20	3.60	279.00	1,004.40	Legal - Claims Administration and Objections
Hall, John	Respond to counsel's request for certain data to add to claims motion	1/14/20	0.40	279.00	111.60	Legal - Claims Administration and Objections
Winkler, Geoffrey	Call with JBH to discuss analysis (.3), review residual payment question (.1)	1/14/20	0.40	315.00	126.00	Legal - Claims Administration and Objections
Hall, John	MIMO claim accounting and schedule making	1/15/20	6.50	279.00	1,813.50	Legal - Claims Administration and Objections
Hall, John	Discuss KF and CC with GBW (.5), research and reach out to KF to discuss status	1/16/20	0.80	279.00	223.20	Legal - Business Operations
Winkler, Geoffrey	Review investment agreement, call with JBH to discuss (1.6)	1/16/20	1.60	315.00	504.00	Legal - Case Administration
Hall, John	MIMO claim accounting and schedule making	1/16/20	7.20	279.00	2,008.80	Legal - Claims Administration and Objections
Winkler, Geoffrey	Emails with PE interested party (.2), review email from counsel and analysis (.3)	1/17/20	0.50	315.00	157.50	Legal - Case Administration
Hall, John	MIMO claim accounting and schedule making	1/17/20	4.00	279.00	1,116.00	Legal - Claims Administration and Objections
Hall, John	Coordinating meeting to discuss status of and disposition options for private equity holdings	1/22/20	0.50	279.00	139.50	Legal - Case Administration
Winkler, Geoffrey	Review email from counsel (.1), review documents from investor (.2)	1/23/20	0.30	315.00	94.50	Legal - Case Administration
Hall, John	Prepare for and call with CFO and in house counsel of KF, follow up call with GBW	1/27/20	1.20	279.00	334.80	Legal - Business Operations
Hall, John	Review CS correspondence, discuss with GBW, memo to counsel requesting procedure advice, memo to LS proposing NDA path forward	1/27/20	0.90	279.00	251.10	Legal - Business Operations
Hall, John	All hands call with counsel to discuss outstanding issues, follow up call with GBW	1/27/20	1.30	279.00	362.70	Legal - Case Administration
Hall, John	Call with GBW to discuss outstanding to do list.	1/27/20	0.30	279.00	83.70	Legal - Case Administration
Winkler, Geoffrey	Call with PE company to discuss investment (.4), call with counsel and JBH (1.0), prepare information for report (1.7)	1/27/20	3.10	315.00	976.50	Legal - Case Administration
Hall, John	Claims calculations in preparation of claims forms	1/27/20	4.80	279.00	1,339.20	Legal - Claims Administration and Objections
Hall, John	Memo on proposed claims procedure to NA	1/27/20	0.50	279.00	139.50	Legal - Claims Administration and Objections
Winkler, Geoffrey	Review accounts, review and execute bill of sale (.3)	1/28/20	0.30	315.00	94.50	Legal - Asset Disposition
Hall, John	Draft NT bill of sale; prepare for signature; UCC search in TX and CA; memo to HG and transmittal of bill of sale	1/28/20	3.00	279.00	837.00	Legal - Business Operations
Hall, John	Review KF NDA, discuss with GBW, memo to counsel to confirm appropriateness of execution	1/28/20	0.80	279.00	223.20	Legal - Business Operations
Hall, John	Claims calculations in preparation of claims forms	1/28/20	4.40	279.00	1,227.60	Legal - Claims Administration and Objections
Hall, John	Review NDA notes, and reply to KF with needed changes to confidentiality agreement	1/29/20	0.80	279.00	223.20	Legal - Business Operations
Hall, John	Coordinate distribution of Essex's 1099	1/29/20	0.40	279.00	111.60	Legal - Business Operations
Hall, John	Review and recommend updates to the lien release and sales tax indemnification document from NT	1/29/20	1.10	279.00	306.90	Legal - Business Operations
Hall, John	Review issues from lessee and CB, discuss with GB and seeking counsel's opinion about needed payments	1/29/20	0.30	279.00	83.70	Legal - Case Administration
Hall, John	Discuss outstanding case issues with receiver	1/29/20	0.40	279.00	111.60	Legal - Case Administration

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**January 1, 2020 - March 31, 2020**  
 (Sorted in Chronological Order by Activity Category)

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Personnel	Item / Description	Date	Hours	Rate	Amount	Activity Category
Hall, John	Affected investor FAQ call	1/29/20	0.20	279.00	55.80	Legal - Case Administration
Hall, John	Review and edit report entries	1/29/20	1.20	279.00	334.80	Legal - Case Administration
Winkler, Geoffrey	Correspond w/ investor (.2), emails with pot. purchaser (.1), prepare financials (2.2), review email from int. party, forward to counsel (.1), review NDA, emails w/ counsel re NDA (.3)	1/29/20	2.90	315.00	913.50	Legal - Case Administration
Hall, John	Claims calculations in preparation of claims forms	1/29/20	4.10	279.00	1,143.90	Legal - Claims Administration and Objections
Winkler, Geoffrey	Review sale documents, forward to counsel, conversation with parties (.4)	1/30/20	0.40	315.00	126.00	Legal - Asset Disposition
Hall, John	Discuss case with DZ and TT	1/30/20	0.50	279.00	139.50	Legal - Case Administration
Hall, John	Review December and January MBT Reconciliations; discuss with GBW	2/3/20	0.50	279.00	139.50	Financial - Corporate Finance
Hall, John	Review outstanding third party issues from counsel, research and investigate stock movement, memo to counsel wit results and recommendations	2/3/20	2.40	279.00	669.60	Financial - Litigation Consulting
Hall, John	Review and archive final NT buyout documents	2/3/20	0.40	279.00	111.60	Legal - Business Operations
Hall, John	Review updated NDA from KF, discuss with GBW, request executable version from KF	2/3/20	0.80	279.00	223.20	Legal - Business Operations
Hall, John	Drafting and editing Fourth Interim Report	2/3/20	1.00	279.00	279.00	Legal - Case Administration
Winkler, Geoffrey	Emails with investors counsel (.1), review and execute NDA (.2), update financial reports and emails with counsel (.8), review documents from CA FTB and CDD, work with JBH (.4)	2/3/20	1.50	315.00	472.50	Legal - Case Administration
Hall, John	Affected creditor FAQ	2/3/20	0.30	279.00	83.70	Legal - Claims Administration and Objections
Hall, John	Claimant accounting schedule development and claimant research	2/3/20	2.80	279.00	781.20	Legal - Claims Administration and Objections
Hall, John	Review UGI correspondence; updating values on asset list; review exit plans for investments	2/4/20	0.50	279.00	139.50	Financial - Corporate Finance
Hall, John	Review BG lease and request meeting to resolve lease buyout	2/4/20	0.90	279.00	251.10	Legal - Business Operations
Hall, John	Drafting and editing Fourth Interim Report	2/4/20	4.20	279.00	1,171.80	Legal - Case Administration
Hall, John	Claimant accounting schedule development and claimant research	2/4/20	2.50	279.00	697.50	Legal - Claims Administration and Objections
Hall, John	Review correspondence received from counsel and research transactions on our end, discuss position with GBW	2/5/20	0.90	279.00	251.10	Financial - Litigation Consulting
Hall, John	Drafting and editing Fourth Interim Report	2/5/20	5.00	279.00	1,395.00	Legal - Case Administration
Winkler, Geoffrey	Email with AB re accounts (.1), call with JBH to discuss case (.3)	2/5/20	0.40	315.00	126.00	Legal - Case Administration
Hall, John	Claimant accounting schedule development and claimant research	2/5/20	2.00	279.00	558.00	Legal - Claims Administration and Objections
Hall, John	Discuss outstanding issues with counsel	2/6/20	0.30	279.00	83.70	Financial - Litigation Consulting
Hall, John	Review CEH NDA	2/6/20	0.40	279.00	111.60	Legal - Asset Disposition
Hall, John	Claimant accounting schedule development and claimant research	2/6/20	7.50	279.00	2,092.50	Legal - Claims Administration and Objections
Hall, John	Affected creditor FAQ	2/6/20	0.20	279.00	55.80	Legal - Claims Administration and Objections
Winkler, Geoffrey	Call with leasee re buyout (.4)	2/7/20	0.40	315.00	126.00	Legal - Asset Disposition
Hall, John	Review NDA from CS, discuss with GBW, redline of requested changes back to CS	2/7/20	0.50	279.00	139.50	Legal - Business Operations
Hall, John	Research, collect info, and prepare final form 941 for ECC	2/7/20	2.80	279.00	781.20	Legal - Business Operations
Hall, John	Resolving issues with CA EDD, preparing DE 1 form	2/7/20	3.10	279.00	864.90	Legal - Business Operations
Hall, John	Preparation for and call with GB regarding asset purchase, follow up with GBW re: same.	2/7/20	0.70	279.00	195.30	Legal - Business Operations
Hall, John	Claimant accounting schedule development and claimant research	2/7/20	1.00	279.00	279.00	Legal - Claims Administration and Objections
Hall, John	Discuss foreclosure with GBW	2/10/20	0.30	279.00	83.70	Legal - Asset Analysis and Recovery
Winkler, Geoffrey	Call with Axos re accounts (.2), emails with counsel re property status (.2), email with potential purchaser (.1), email with bank re account (.1)	2/10/20	0.60	315.00	189.00	Legal - Asset Disposition
Hall, John	Residual payment discussions with GB	2/10/20	0.20	279.00	55.80	Legal - Business Operations
Hall, John	Drafting POC form and Instructions	2/10/20	2.90	279.00	809.10	Legal - Claims Administration and Objections

**SEC v. Essex Capital Corporation**  
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**January 1, 2020 - March 31, 2020**  
 (Sorted in Chronological Order by Activity Category)

Attachment 1

Personnel	Item / Description	Date	Hours	Rate	Amount	Activity Category
Hall, John	Claimant accounting, process finalization, memo to GBW	2/10/20	4.70	279.00	1,311.30	Legal - Claims Administration and Objections
Hall, John	Residual payment discussions with GB	2/11/20	0.10	279.00	27.90	Legal - Business Operations
Hall, John	Affected investor FAQ	2/11/20	0.40	279.00	111.60	Legal - Case Administration
Hall, John	Drafting POC form and Instructions	2/11/20	7.50	279.00	2,092.50	Legal - Claims Administration and Objections
Hall, John	Review updated NDA, execution activities	2/12/20	0.50	279.00	139.50	Legal - Case Administration
Winkler, Geoffrey	Review and execute NDA (.2)	2/12/20	0.20	315.00	63.00	Legal - Case Administration
Hall, John	Drafting POC form and Instructions	2/12/20	5.00	279.00	1,395.00	Legal - Claims Administration and Objections
Hall, John	Drafting Notice of Initial Determination of Claims	2/12/20	2.60	279.00	725.40	Legal - Claims Administration and Objections
Hall, John	Review GL materials provided by CS	2/13/20	2.80	279.00	781.20	Financial - Data Analysis
Hall, John	Review materials from UGI	2/13/20	0.30	279.00	83.70	Legal - Case Administration
Hall, John	Drafting Notice of Initial Determination of Claims	2/13/20	4.80	279.00	1,339.20	Legal - Claims Administration and Objections
Hall, John	Review GL materials provided by CS	2/14/20	4.60	279.00	1,283.40	Financial - Data Analysis
Hall, John	Analyze and summarize findings and write memo to GBW	2/14/20	0.80	279.00	223.20	Legal - Case Administration
Hall, John	Drafting Notice of Initial Determination of Claims	2/14/20	2.70	279.00	753.30	Legal - Claims Administration and Objections
Hall, John	Review PC docs and prep for potential buyer.	2/18/20	0.50	279.00	139.50	Legal - Asset Disposition
Hall, John	Discuss asset buyout details with MZ of GB	2/18/20	0.50	279.00	139.50	Legal - Business Operations
Hall, John	Research terms of lease; security deposit; payment history in preparation for asset sale	2/18/20	1.20	279.00	334.80	Legal - Business Operations
Hall, John	Discuss ongoing case needs with GBW	2/18/20	0.60	279.00	167.40	Legal - Case Administration
Winkler, Geoffrey	Review and respond to email from investor counsel (.1), email to lessor re status (.1), review and balance reconciliations (.4)	2/18/20	0.60	315.00	189.00	Legal - Case Administration
Hall, John	Producing Initial determination of claim form, instructions and definition of terms, draft schedule A and draft schedule B	2/18/20	5.20	279.00	1,450.80	Legal - Claims Administration and Objections
Hall, John	Research terms of lease; security deposit; payment history in preparation for asset sale	2/19/20	1.20	279.00	334.80	Legal - Business Operations
Hall, John	Review PC series B shares issues, review holdings	2/19/20	0.20	279.00	55.80	Legal - Business Operations
Hall, John	Request and review MBT reconciliations	2/19/20	0.20	279.00	55.80	Legal - Business Operations
Winkler, Geoffrey	Call with investor counsel (.3), review documents and prepare for sale (.5)	2/19/20	0.80	315.00	252.00	Legal - Case Administration
Hall, John	Producing Initial determination of claim form, instructions and definition of terms, draft schedule A and draft schedule B	2/19/20	6.30	279.00	1,757.70	Legal - Claims Administration and Objections
Hall, John	Review claims materials received from RT	2/19/20	0.60	279.00	167.40	Legal - Claims Administration and Objections
Hall, John	Review and consult on settlement communications	2/20/20	1.30	279.00	362.70	Financial - Litigation Consulting
Hall, John	Review SIU tax preparation documents, compare to books and records	2/20/20	0.80	279.00	223.20	Financial - Tax issues
Winkler, Geoffrey	Review and balance reconciliations (.4), review sale documents and emails with counsel (.3), work with counsel on proposed settlement offer (.2)	2/20/20	0.90	315.00	283.50	Legal - Asset Disposition
Hall, John	Review PC series B shares issues, review holdings	2/20/20	0.40	279.00	111.60	Legal - Business Operations
Hall, John	Request and review MBT reconciliations	2/20/20	0.50	279.00	139.50	Legal - Business Operations
Hall, John	Calls from former employee, FAQ	2/20/20	0.60	279.00	167.40	Legal - Business Operations
Hall, John	Discuss case with counsel (.3) and GBW (.5)	2/20/20	0.80	279.00	223.20	Legal - Case Administration
Hall, John	Producing initial determination of claim form, instructions and definition of terms, draft schedule A and draft schedule B	2/20/20	3.90	279.00	1,088.10	Legal - Claims Administration and Objections
Hall, John	Review and investigate ELP partner tax return for 2017	2/21/20	0.40	279.00	111.60	Financial - Tax issues
Hall, John	Review and investigate SIU 2017 return	2/21/20	0.50	279.00	139.50	Financial - Tax issues



**SEC v. Essex Capital Corporation**  
**Summary of Fees of Receiver and Retained Personnel**  
**January 1, 2020 - March 31, 2020**  
**(Sorted in Chronological Order by Activity Category)**

Attachment 1

Personnel	Item / Description	Date	Hours	Rate	Amount	Activity Category
Hall, John	Review 2017 BY return, compare to known books and records	2/21/20	0.80	279.00	223.20	Financial - Tax issues
Hall, John	Reviewing 2017 trust documents and accounting for funding sources	2/21/20	2.50	279.00	697.50	Legal - Asset Analysis and Recovery
Hall, John	Review and analysis of FES sales documents, appreciation agreement	2/21/20	1.20	279.00	334.80	Legal - Asset Disposition
Winkler, Geoffrey	Review documents, emails with potential purchaser re sale (.3)	2/21/20	0.30	315.00	94.50	Legal - Asset Disposition
Hall, John	EE entity investigation and review of source documents	2/21/20	2.10	279.00	585.90	Legal - Case Administration
Hall, John	Analysis of CB source documents	2/21/20	1.50	279.00	418.50	Legal - Claims Administration and Objections
Hall, John	GB lease buyout discussion, analysis, documentation	2/24/20	0.30	279.00	83.70	Legal - Business Operations
Hall, John	Review of CA sales tax documents, create account on CDTFA, Create request for temporary sales and use authority to remit EV sales tax	2/24/20	6.20	279.00	1,729.80	Legal - Business Operations
Hall, John	Discuss outstanding case items with GBW	2/24/20	0.40	279.00	111.60	Legal - Case Administration
Hall, John	Affected investor FAQ	2/24/20	0.30	279.00	83.70	Legal - Case Administration
Hall, John	Develop claim form and motion	2/24/20	0.80	279.00	223.20	Legal - Claims Administration and Objections
Hall, John	Review documents for IHC	2/25/20	0.50	279.00	139.50	Legal - Case Administration
Hall, John	Review received materials and follow up with affected claimant	2/25/20	0.80	279.00	223.20	Legal - Claims Administration and Objections
Hall, John	Review documentation received from RT, confirmation against accounting records	2/25/20	0.60	279.00	167.40	Legal - Claims Administration and Objections
Hall, John	Develop claim form and motion	2/25/20	6.20	279.00	1,729.80	Legal - Claims Administration and Objections
Winkler, Geoffrey	Emails with potential purchaser (.1)	2/26/20	0.10	315.00	31.50	Legal - Asset Disposition
Hall, John	Giddy lease buyout discussion, analysis, documentation	2/26/20	0.20	279.00	55.80	Legal - Business Operations
Hall, John	Discuss outstanding case items with GBW	2/26/20	0.70	279.00	195.30	Legal - Case Administration
Hall, John	Develop claim form and motion	2/26/20	3.20	279.00	892.80	Legal - Claims Administration and Objections
Hall, John	Review financial files for PC, PB, and TL ownership documentation	2/27/20	4.00	279.00	1,116.00	Legal - Asset Analysis and Recovery
Winkler, Geoffrey	Call to discuss asset sales (.2), review sale agreement and emails with counsel (.2)	2/27/20	0.40	315.00	126.00	Legal - Asset Disposition
Hall, John	Affected investor FAQ	2/27/20	0.40	279.00	111.60	Legal - Case Administration
Hall, John	Develop claim form and motion	2/27/20	3.10	279.00	864.90	Legal - Claims Administration and Objections
Hall, John	scanning and preparing documents for GBW	2/28/20	0.80	279.00	223.20	Legal - Asset Disposition
Winkler, Geoffrey	Call to discuss asset sales (.3), gather documents (.3), review sale motion and emails with counsel (.2), review proposed changes and emails with potential purchaser (.2)	2/28/20	1.00	315.00	315.00	Legal - Asset Disposition
Hall, John	Giddy lease buyout discussion, analysis, documentation	2/28/20	0.40	279.00	111.60	Legal - Business Operations
Hall, John	Reach out to CEO of PC to confirm holdings; review provided reports	2/28/20	0.40	279.00	111.60	Legal - Business Operations
Hall, John	Discuss outstanding case items with GBW	2/28/20	0.30	279.00	83.70	Legal - Case Administration
Hall, John	Develop claim form and motion	2/28/20	5.90	279.00	1,646.10	Legal - Claims Administration and Objections
Hall, John	Affected investor FAQ	2/29/20	0.50	279.00	139.50	Legal - Case Administration
Hall, John	Confirmation and gathering supporting documentation	3/2/20	1.50	279.00	418.50	Financial - Business Analysis
Hall, John	Identification of fund diversions for accounting report	3/2/20	3.10	279.00	864.90	Financial - Forensic Accounting
Hall, John	Research and discuss PC, and outlook with GBW	3/2/20	1.10	279.00	306.90	Legal - Asset Disposition
Hall, John	Affected investor's representative FAQ	3/2/20	0.60	279.00	167.40	Legal - Case Administration
Hall, John	Case discussion items with counsel and Receiver	3/2/20	1.00	279.00	279.00	Legal - Case Administration
Hall, John	Discuss case with Receiver, to-do list and outstanding items.	3/2/20	0.30	279.00	83.70	Legal - Case Administration

**SEC v. Essex Capital Corporation**  
**Summary of Fees of Receiver and Retained Personnel**  
**January 1, 2020 - March 31, 2020**  
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Attachment 1

Personnel	Item / Description	Date	Hours	Rate	Amount	Activity Category
Winkler, Geoffrey	Call with counsel to discuss case (.5), emails with potential purchaser (.2)	3/2/20	0.70	315.00	220.50	Legal - Case Administration
Hall, John	Affected investor FAQ	3/2/20	0.40	279.00	111.60	Legal - Claims Administration and Objections
Hall, John	Confirmation and gathering supporting documentation	3/3/20	4.10	279.00	1,143.90	Financial - Business Analysis
Hall, John	Identification of fund diversions for accounting report	3/3/20	2.00	279.00	558.00	Financial - Forensic Accounting
Hall, John	Review offer and update from MZ on lease buyout	3/3/20	0.60	279.00	167.40	Legal - Asset Disposition
Winkler, Geoffrey	Call with potential purchaser (.4), emails with potential purchaser (.2), emails with counsel re sale timing (.1)	3/3/20	0.70	315.00	220.50	Legal - Asset Disposition
Hall, John	Review request from counsel, research PC issues and call to TH	3/3/20	0.80	279.00	223.20	Legal - Case Administration
Hall, John	Affected investor FAQ	3/3/20	0.50	279.00	139.50	Legal - Case Administration
Hall, John	Confirmation and gathering supporting documentation	3/4/20	1.40	279.00	390.60	Financial - Business Analysis
Hall, John	Review 2013 - present charitable contributions; tax return analysis; investigate organizations; schedule and overview to GBW	3/4/20	6.20	279.00	1,729.80	Legal - Asset Analysis and Recovery
Hall, John	Discuss case with Receiver, to-do list and outstanding items	3/4/20	0.30	279.00	83.70	Legal - Case Administration
Winkler, Geoffrey	Review draft motion and emails with counsel (.3)	3/4/20	0.30	315.00	94.50	Legal - Case Administration
Hall, John	Affected investor FAQ	3/4/20	0.20	279.00	55.80	Legal - Claims Administration and Objections
Hall, John	Confirmation and gathering supporting documentation	3/5/20	2.40	279.00	669.60	Financial - Business Analysis
Hall, John	Review physical files, identify stock certificates and other investment materials, summarize finds to GBW, scan documents and provide to potential buyer	3/5/20	4.50	279.00	1,255.50	Legal - Case Administration
Hall, John	Discuss case with Receiver, to-do list and outstanding items	3/5/20	0.40	279.00	111.60	Legal - Case Administration
Hall, John	Affected investor FAQ	3/5/20	0.60	279.00	167.40	Legal - Claims Administration and Objections
Hall, John	Identification of funds for accounting report	3/6/20	2.50	279.00	697.50	Financial - Forensic Accounting
Hall, John	Review lease and confirm outstanding issues with client	3/6/20	0.90	279.00	251.10	Legal - Asset Disposition
Hall, John	Review Feb reconciliation, discuss with GBW, memo to MJ	3/6/20	0.80	279.00	223.20	Legal - Asset Disposition
Hall, John	Discuss case with Receiver, to-do list and outstanding items	3/6/20	0.70	279.00	195.30	Legal - Case Administration
Winkler, Geoffrey	Review draft motion (.2), emails with JBH re reconciliations (.1)	3/6/20	0.30	315.00	94.50	Legal - Case Administration
Hall, John	Review Essex claims process issues with counsel	3/6/20	0.60	279.00	167.40	Legal - Claims Administration and Objections
Hall, John	Review outstanding procedural issues with counsel	3/6/20	1.20	279.00	334.80	Legal - Claims Administration and Objections
Hall, John	Affected investor FAQ	3/6/20	0.30	279.00	83.70	Legal - Claims Administration and Objections
Hall, John	Activities surround the GB buyout	3/9/20	0.40	279.00	111.60	Legal - Asset Disposition
Hall, John	Discuss case with receiver, to-do items	3/9/20	1.10	279.00	306.90	Legal - Case Administration
Hall, John	Scheduling donations and send to counsel with memo	3/9/20	0.50	279.00	139.50	Legal - Case Administration
Hall, John	Discuss accounting report with NA	3/9/20	0.40	279.00	111.60	Legal - Case Administration
Winkler, Geoffrey	Review email from counsel re report, emails with counsel, call with JBH (.4)	3/9/20	0.40	315.00	126.00	Legal - Case Administration
Hall, John	Finalization of claims forms, send to counsel for feedback and review	3/9/20	6.80	279.00	1,897.20	Legal - Claims Administration and Objections
Hall, John	Activities surround the GB buyout	3/10/20	0.80	279.00	223.20	Legal - Asset Disposition
Hall, John	Drafting accounting report	3/10/20	7.90	279.00	2,204.10	Legal - Case Administration
Hall, John	Discuss case with receiver, to-do items	3/10/20	0.30	279.00	83.70	Legal - Case Administration
Winkler, Geoffrey	Emails with counsel re report (.1)	3/10/20	0.10	315.00	31.50	Legal - Case Administration
Hall, John	Activities surround the GB buyout	3/11/20	1.50	279.00	418.50	Legal - Asset Disposition
Hall, John	UCC search and document production for Delaware corporation	3/11/20	2.00	279.00	558.00	Legal - Business Operations

**SEC v. Essex Capital Corporation**  
**Summary of Fees of Receiver and Retained Personnel**  
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Personnel	Item / Description	Date	Hours	Rate	Amount	Activity Category
Hall, John	Drafting accounting report	3/11/20	4.00	279.00	1,116.00	Legal - Case Administration
Hall, John	Affected investor FAQ	3/11/20	0.50	279.00	139.50	Legal - Claims Administration and Objections
Hall, John	Accounting Report Drafting	3/12/20	5.90	279.00	1,646.10	Financial - Forensic Accounting
Hall, John	Activities surround the GB buyout	3/12/20	0.40	279.00	111.60	Legal - Asset Disposition
Winkler, Geoffrey	Call to discuss purchase (.3), emails re UCC search (.1)	3/12/20	0.40	315.00	126.00	Legal - Asset Disposition
Hall, John	UCC search and document production for Delaware corporation	3/12/20	1.50	279.00	418.50	Legal - Business Operations
Hall, John	Drafting accounting report	3/12/20	3.80	279.00	1,060.20	Legal - Case Administration
Hall, John	Memo to counsel regarding needed updates to bill of sale	3/12/20	0.70	279.00	195.30	Legal - Case Administration
Hall, John	Discuss case with receiver, to-do items	3/12/20	0.70	279.00	195.30	Legal - Case Administration
Hall, John	Discuss outstanding issues with counsel, timeframe for accounting report	3/12/20	0.50	279.00	139.50	Legal - Case Administration
Hall, John	Affected investor FAQ	3/12/20	0.60	279.00	167.40	Legal - Claims Administration and Objections
Hall, John	Activities surround the GB buyout	3/13/20	0.50	279.00	139.50	Legal - Asset Disposition
Hall, John	Discuss outstanding issues with counsel, timeframe for accounting report	3/13/20	0.20	279.00	55.80	Legal - Case Administration
Hall, John	Drafting accounting report	3/13/20	6.60	279.00	1,841.40	Legal - Case Administration
Hall, John	Discuss case with receiver, to-do items	3/13/20	0.40	279.00	111.60	Legal - Case Administration
Hall, John	Affected investor FAQ	3/13/20	0.40	279.00	111.60	Legal - Claims Administration and Objections
Hall, John	Review UGI 2019 K-1s	3/16/20	0.50	279.00	139.50	Financial - Accounting/Auditing
Hall, John	Production of accounting report	3/16/20	7.20	279.00	2,008.80	Legal - Case Administration
Hall, John	Discussion of outstanding case issues with GBW	3/16/20	0.30	279.00	83.70	Legal - Case Administration
Hall, John	Activities surround the GB buyout	3/17/20	0.60	279.00	167.40	Legal - Business Operations
Hall, John	Production of accounting report	3/17/20	6.50	279.00	1,813.50	Legal - Case Administration
Hall, John	Production of accounting report	3/18/20	4.50	279.00	1,255.50	Legal - Case Administration
Hall, John	Review draft stipulation re claims procedures	3/18/20	1.30	279.00	362.70	Legal - Case Administration
Hall, John	Discussion of outstanding case issues with GBW	3/18/20	0.40	279.00	111.60	Legal - Case Administration
Hall, John	Discuss outstanding issues with counsel	3/18/20	0.30	279.00	83.70	Legal - Case Administration
Winkler, Geoffrey	Legal - Case Administration	3/18/20	0.60	315.00	189.00	Legal - Case Administration
Hall, John	Review draft stipulation re claims procedures	3/19/20	0.20	279.00	55.80	Legal - Case Administration
Hall, John	Disgorgement procedures data gathering for motions	3/19/20	1.20	279.00	334.80	Legal - Case Administration
Hall, John	Production of accounting report	3/19/20	5.00	279.00	1,395.00	Legal - Case Administration
Hall, John	Production of accounting report	3/20/20	6.00	279.00	1,674.00	Legal - Case Administration
Hall, John	Discussion of outstanding case issues with GBW	3/20/20	0.50	279.00	139.50	Legal - Case Administration
Hall, John	Disgorgement procedures data gathering for motions	3/20/20	0.50	279.00	139.50	Legal - Case Administration
Hall, John	Affected investor FAQ	3/23/20	0.50	279.00	139.50	Legal - Case Administration
Hall, John	Reviewing final order and stipulation documents	3/23/20	0.80	279.00	223.20	Legal - Case Administration
Hall, John	Production of accounting report	3/23/20	5.10	279.00	1,422.90	Legal - Case Administration
Winkler, Geoffrey	Emails with counsel re settlement (.2)	3/23/20	0.20	315.00	63.00	Legal - Case Administration
Hall, John	Production of accounting report	3/24/20	6.40	279.00	1,785.60	Legal - Case Administration

**SEC v. Essex Capital Corporation**  
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**January 1, 2020 - March 31, 2020**  
 (Sorted in Chronological Order by Activity Category)

Attachment 1

<u>Personnel</u>	<u>Item / Description</u>	<u>Date</u>	<u>Hours</u>	<u>Rate</u>	<u>Amount</u>	<u>Activity Category</u>
Winkler, Geoffrey	Call with counsel to discuss settlement (.3), review files re potential litigation (2.6)	3/24/20	2.90	315.00	913.50	Legal - Case Administration
Hall, John	Production of accounting report	3/25/20	5.70	279.00	1,590.30	Legal - Case Administration
Hall, John	Discuss outstanding case issues with GBW	3/25/20	0.50	279.00	139.50	Legal - Case Administration
Hall, John	Affected investor FAQ	3/25/20	0.20	279.00	55.80	Legal - Case Administration
Winkler, Geoffrey	Call with counsel to update case status and discuss next steps (.5), call with JBH (.2), review litigation files (1.5)	3/25/20	2.20	315.00	693.00	Legal - Case Administration
Hall, John	Memo to counsel requesting advice on report content	3/26/20	0.50	279.00	139.50	Legal - Case Administration
Hall, John	Production of accounting report	3/26/20	5.50	279.00	1,534.50	Legal - Case Administration
Hall, John	Discuss outstanding case issues with GBW	3/26/20	0.40	279.00	111.60	Legal - Case Administration
Hall, John	Affected investor FAQ	3/27/20	0.40	279.00	111.60	Legal - Case Administration
Hall, John	Production of accounting report	3/27/20	5.30	279.00	1,478.70	Legal - Case Administration
Hall, John	Discuss outstanding case issues with GBW	3/27/20	0.70	279.00	195.30	Legal - Case Administration
Hall, John	Accounting Report Drafting	3/30/20	4.70	279.00	1,311.30	Financial - Forensic Accounting
Hall, John	Review and analyze LL file, memo and wire instructions to GBW	3/30/20	1.10	279.00	306.90	Legal - Business Operations
Hall, John	Review SF letter, settlement order, personal property sale order, fee apps orders	3/30/20	0.60	279.00	167.40	Legal - Case Administration
Hall, John	Discuss case with Receiver	3/30/20	0.30	279.00	83.70	Legal - Case Administration
Winkler, Geoffrey	Review court orders and process payments (.7), emails with potential purchaser re court order (.2), emails with counsel re sale documents (.1), emails with potential purchaser (.1)	3/30/20	1.10	315.00	346.50	Legal - Case Administration
Hall, John	Affected investor FAQ	3/30/20	0.20	279.00	55.80	Legal - Claims Administration and Objections
Hall, John	Accounting Report Drafting	3/31/20	6.40	279.00	1,785.60	Financial - Forensic Accounting
Hall, John	Accounting Report Drafting	3/31/20	5.50	279.00	1,534.50	Financial - Forensic Accounting
Hall, John	Discuss case with Receiver	3/31/20	0.90	279.00	251.10	Legal - Case Administration
Winkler, Geoffrey	Process additional payments, balance accounts (.4)	3/31/20	0.40	315.00	126.00	Legal - Case Administration
				<b>Totals</b>	<b>468.6</b>	<b>\$ 131,848.20</b>

**SEC v. Essex Capital Corporation**  
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**January 1, 2020 - March 31, 2020**  
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Attachment 1

Personnel	Item / Description	Date	Hours	Rate	Amount	Activity Category
<b>Summary by Activity Category and Personnel</b>						
<b>Financial - Accounting/Auditing</b>	<b>Personnel</b>	<b>Firm</b>	<b>Hours</b>	<b>Rate</b>	<b>Amount</b>	
Financial - Accounting/Auditing	Hall, John	A&M	0.5	279.00	\$ 139.50	
Financial - Accounting/Auditing	Johnson, Robert	A&M	0.0	595.00	\$ -	
Financial - Accounting/Auditing	Winkler, Geoffrey	A&M	0.0	315.00	\$ -	
			<u>0.5</u>		<u>\$ 139.50</u>	
<b>Financial - Business Analysis</b>	<b>Personnel</b>	<b>Firm</b>	<b>Hours</b>	<b>Rate</b>	<b>Amount</b>	
Financial - Business Analysis	Hall, John	A&M	10.6	279.00	\$ 2,957.40	
Financial - Business Analysis	Johnson, Robert	A&M	0.0	595.00	\$ -	
Financial - Business Analysis	Winkler, Geoffrey	A&M	0.0	315.00	\$ -	
			<u>10.6</u>		<u>\$ 2,957.40</u>	
<b>Financial - Corporate Finance</b>	<b>Personnel</b>	<b>Firm</b>	<b>Hours</b>	<b>Rate</b>	<b>Amount</b>	
Financial - Corporate Finance	Hall, John	A&M	1.0	279.00	\$ 279.00	
Financial - Corporate Finance	Johnson, Robert	A&M	0.0	595.00	\$ -	
Financial - Corporate Finance	Winkler, Geoffrey	A&M	0.0	315.00	\$ -	
			<u>1.0</u>		<u>\$ 279.00</u>	
<b>Financial - Data Analysis</b>	<b>Personnel</b>	<b>Firm</b>	<b>Hours</b>	<b>Rate</b>	<b>Amount</b>	
Financial - Data Analysis	Hall, John	A&M	15.4	279.00	\$ 4,296.60	
Financial - Data Analysis	Johnson, Robert	A&M	0.0	595.00	\$ -	
Financial - Data Analysis	Winkler, Geoffrey	A&M	0.0	315.00	\$ -	
			<u>15.4</u>		<u>\$ 4,296.60</u>	
<b>Financial - Forensic Accounting</b>	<b>Personnel</b>	<b>Firm</b>	<b>Hours</b>	<b>Rate</b>	<b>Amount</b>	
Financial - Forensic Accounting	Hall, John	A&M	30.1	279.00	\$ 8,397.90	
Financial - Forensic Accounting	Johnson, Robert	A&M	0.0	595.00	\$ -	
Financial - Forensic Accounting	Winkler, Geoffrey	A&M	0.0	315.00	\$ -	
			<u>30.1</u>		<u>\$ 8,397.90</u>	
<b>Financial - Litigation Consulting</b>	<b>Personnel</b>	<b>Firm</b>	<b>Hours</b>	<b>Rate</b>	<b>Amount</b>	
Financial - Litigation Consulting	Hall, John	A&M	32.3	279.00	\$ 9,011.70	
Financial - Litigation Consulting	Johnson, Robert	A&M	0.0	595.00	\$ -	
Financial - Litigation Consulting	Winkler, Geoffrey	A&M	0.0	315.00	\$ -	
			<u>32.3</u>		<u>\$ 9,011.70</u>	
<b>Financial - Tax Issues</b>	<b>Personnel</b>	<b>Firm</b>	<b>Hours</b>	<b>Rate</b>	<b>Amount</b>	
Financial - Tax Issues	Hall, John	A&M	2.5	279.00	\$ 697.50	
Financial - Tax Issues	Johnson, Robert	A&M	0.0	595.00	\$ -	
Financial - Tax Issues	Winkler, Geoffrey	A&M	0.0	315.00	\$ -	
			<u>2.5</u>		<u>\$ 697.50</u>	
<b>Legal - Asset Analysis and Recovery</b>	<b>Personnel</b>	<b>Firm</b>	<b>Hours</b>	<b>Rate</b>	<b>Amount</b>	
Legal - Asset Analysis and Recovery	Hall, John	A&M	13.0	279.00	\$ 3,627.00	
Legal - Asset Analysis and Recovery	Johnson, Robert	A&M	0.0	595.00	\$ -	
Legal - Asset Analysis and Recovery	Winkler, Geoffrey	A&M	0.0	315.00	\$ -	
			<u>13.0</u>		<u>\$ 3,627.00</u>	
<b>Legal - Asset Disposition</b>	<b>Personnel</b>	<b>Firm</b>	<b>Hours</b>	<b>Rate</b>	<b>Amount</b>	

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Personnel	Item / Description	Date	Hours	Rate	Amount	Activity Category
Legal - Asset Disposition	Hall, John	A&M	10.3	279.00	\$ 2,873.70	
Legal - Asset Disposition	Johnson, Robert	A&M	0.0	595.00	\$ -	
Legal - Asset Disposition	Winkler, Geoffrey	A&M	6.1	315.00	\$ 1,921.50	
			<u>16.4</u>		<u>\$ 4,795.20</u>	
<b>Legal - Business Operations</b>	<b>Personnel</b>	<b>Firm</b>	<b>Hours</b>	<b>Rate</b>	<b>Amount</b>	
Legal - Business Operations	Hall, John	A&M	40.8	279.00	\$ 11,383.20	
Legal - Business Operations	Johnson, Robert	A&M	0.0	235.00	\$ -	
Legal - Business Operations	Winkler, Geoffrey	A&M	0.0	315.00	\$ -	
			<u>40.8</u>		<u>\$ 11,383.20</u>	
<b>Legal - Case Administration</b>	<b>Personnel</b>	<b>Firm</b>	<b>Hours</b>	<b>Rate</b>	<b>Amount</b>	
Legal - Case Administration	Hall, John	A&M	135.9	279.00	\$ 37,916.10	
Legal - Case Administration	Johnson, Robert	A&M	0.0	595.00	\$ -	
Legal - Case Administration	Winkler, Geoffrey	A&M	24.0	315.00	\$ 7,560.00	
			<u>159.9</u>		<u>\$ 45,476.10</u>	
<b>Legal - Claims Administration and Objections</b>	<b>Personnel</b>	<b>Firm</b>	<b>Hours</b>	<b>Rate</b>	<b>Amount</b>	
Legal - Claims Administration and Objections	Hall, John	A&M	145.4	279.00	\$ 40,566.60	
Legal - Claims Administration and Objections	Johnson, Robert	A&M	0.0	595.00	\$ -	
Legal - Claims Administration and Objections	Winkler, Geoffrey	A&M	0.7	315.00	\$ 220.50	
			<u>146.1</u>		<u>\$ 40,787.10</u>	
<b>Travel</b>	<b>Personnel</b>	<b>Firm</b>	<b>Hours</b>	<b>Rate</b>	<b>Amount</b>	
Travel	Hall, John	A&M	0.0	279.00	\$ -	
Travel	Johnson, Robert	A&M	0.0	595.00	\$ -	
Travel	Winkler, Geoffrey	A&M	0.0	315.00	\$ -	
			<u>0.0</u>		<u>\$ -</u>	
<b>Overall Summary</b>						
<b>Totals</b>	<b>Personnel</b>	<b>Firm</b>	<b>Hours</b>	<b>Rate</b>	<b>Amount</b>	
	Hall, John	A&M	437.8	279.00	\$ 122,146.20	
	Johnson, Robert	A&M	0.0	595.00	\$ -	
	Winkler, Geoffrey	A&M	30.8	315.00	\$ 9,702.00	
			<u>468.6</u>		<u>\$ 131,848.20</u>	
	<b>TOTAL FEES</b>				<b>\$ 131,848.20</b>	

**SEC v. Essex Capital Corporation**  
**Summary of Expenses of Receiver and Retained Personnel**  
**January 1, 2020 - March 31, 2020**

**Attachment 2**

<b>Incurred By</b>	<b>Payee</b>	<b>Item / Description</b>	<b>Date Incurred</b>	<b>Amount</b>	<b>Category</b>
Winkler, Geoffrey	Godaddy.com	Internet/Online Fees: Webhosting services	1/2/20	227.64	Internet/Online Fees
Winkler, Geoffrey	Godaddy.com	Internet/Online Fees: Webhosting services	1/3/20	18.17	Internet/Online Fees
Winkler, Geoffrey	Godaddy.com	Internet/Online Fees: Webhosting services	1/4/20	49.95	Internet/Online Fees
Winkler, Geoffrey	Gogo	Internet/Online Fees: Internet inflight	2/2/20	120.00	Internet/Online Fees
Winkler, Geoffrey	USPS	Shipping: Courier evidence	2/10/20	1.60	Courier/Shipping/Freight
Winkler, Geoffrey	PACER	Miscellaneous: Court document access	1/7/20	45.60	Miscellaneous
Hall, John	Quickbooks	License Fees: Monthly license fee for QB Online	1/12/20	70.00	Miscellaneous
Hall, John	Quickbooks	License Fees: Monthly license fee for QB Online	2/12/20	70.00	Miscellaneous
Hall, John	Delaware SOS	Miscellaneous: UCC filings	3/11/20	80.00	Miscellaneous
Hall, John	Quickbooks	License Fees: Monthly license fee for QB Online	3/12/20	70.00	Miscellaneous
<b>Total</b>				<b>\$ 752.96</b>	

}

07/11/20 17:45:01 PROFORMA STATEMENT FOR MATTER 378224.00002 (Winkler, Geoff/Receiver for Essex Capita) (General Receivership)

**Preliminary Billing Form**Billing Atty: 001842 - Del Castillo,  
Joshua

Matter #: 378224.00002

Client Name: Winkler, Geoff/Receiver for Essex Capita

Date of Last Billing: 03/31/20

Matter Name: General Receivership

Proforma Number: 1045150

Client/Matter Joint Group # 378224-1

**Fees for Matter 378224.00002.(General Receivership)**

<b>Trans Date</b>	<b>Index</b>	<b>Description of Service Rendered</b>	<b>Timekeeper</b>	<b>Hours</b>	<b>Fees</b>	<b>Sum</b>	<b>Circle</b>	<b>Action</b>		
01/02/20	132954	Finalize response to Perry and Wolansky motion for relief from stay and confer with counsel re same (0.7); supervise filing (0.1).	Del Castillo, Joshua	0.80	475.20	475.20	WO	HD	TR	_____
01/06/20	33027	Attention to outstanding case administration matters (0.5); teleconference with Receiver's office re same (0.3).	Del Castillo, Joshua	0.80	475.20	950.40	WO	HD	TR	_____
01/08/20	52953	Review and assess records re: Grant transactions, including supporting documents and related materials provided by Grant (1.8).	Hsu, Tim	1.80	939.60	1,890.00	WO	HD	TR	_____
01/09/20	52192	Further review and analysis of Grant transactions and provide update to counsel re: the same (2.6); Review Grant notes and related operating agreement for transfer of shares (0.8).	Hsu, Tim	3.40	1,774.80	3,664.80	WO	HD	TR	_____
01/10/20	53965	Confer with counsel on issues re: Grant accounting and transactions (0.6).	Hsu, Tim	0.60	313.20	3,978.00	WO	HD	TR	_____
01/13/20	30571	Attention to case administration matters and confer with Receiver's office re same (0.4).	Del Castillo, Joshua	0.40	237.60	4,215.60	WO	HD	TR	_____



07/11/20 17:45:01 PROFORMA STATEMENT FOR MATTER 378224.00002 (Winkler, Geoff/Receiver for Essex Capita) (General Receivership)

**Fees for Matter 378224.00002.(General Receivership)**

<b>Trans Date</b>	<b>Index</b>	<b>Description of Service Rendered</b>	<b>Timekeeper</b>	<b>Hours</b>	<b>Fees</b>	<b>Sum</b>	<b>Circle</b>	<b>Action</b>		
01/13/20	53089	Call with Receiver's staff to discuss Grant transactions (0.6); Review and assess additional issues raised by staff and respond to the same, and confer with counsel (1.3).	Hsu, Tim	1.90	991.80	5,207.40	WO	HD	TR	_____
01/14/20	53092	Review and assess additional information provided by Receiver's staff re: Grant transactions and confer with counsel re: the same (1.3).	Hsu, Tim	1.30	678.60	5,886.00	WO	HD	TR	_____
01/16/20	55272	Review SEC filings re settlement and applications and confer with counsel re same (0.2).	Del Castillo, Joshua	0.20	118.80	6,004.80	WO	HD	TR	_____
01/21/20	55928	Attention to case administration matters and e-mails re same (0.5).	Del Castillo, Joshua	0.50	297.00	6,301.80	WO	HD	TR	_____
01/23/20	57726	e-mails and teleconference with counsel and Receiver's office re estate administration matters (0.8).	Del Castillo, Joshua	0.80	475.20	6,777.00	WO	HD	TR	_____
01/27/20	53178	Further review of confirmed transactions for Grant and assess against records provided by Grant's counsel disputing the same (0.8).	Hsu, Tim	0.80	417.60	7,194.60	WO	HD	TR	_____
01/27/20	131584	Prepare for and teleconference with Receiver's office re outstanding matters (1.3).	Del Castillo, Joshua	1.30	772.20	7,966.80	WO	HD	TR	_____
01/29/20	51212	Meeting with counsel to discuss Grant transaction issues, and follow up calls with J.Hall re: the same (0.9).	Hsu, Tim	0.90	469.80	8,436.60	WO	HD	TR	_____

07/11/20 17:45:01 PROFORMA STATEMENT FOR MATTER 378224.00002 (Winkler, Geoff/Receiver for Essex Capita) (General Receivership)

**Fees for Matter 378224.00002.(General Receivership)**

<b>Trans Date</b>	<b>Index</b>	<b>Description of Service Rendered</b>	<b>Timekeeper</b>	<b>Hours</b>	<b>Fees</b>	<b>Sum</b>	<b>Circle</b>	<b>Action</b>		
01/30/20	136828	Confer with counsel and SEC re prospective supplement to Receiver's Response to Motion for Relief from Stay (0.9); prepare draft Supplemental Response and circulate for meet and confer purposes (0.5).	Del Castillo, Joshua	1.40	831.60	9,268.20	WO	HD	TR	_____
02/03/20	7994161	Teleconference with SEC and JPMorgan Chase re Penny Lane property (0.2); attention to case administration matters (0.7).	Del Castillo, Joshua	0.90	534.60	9,802.80	WO	HD	TR	_____
02/10/20	8001134	Attention to case administration issues (0.4).	Del Castillo, Joshua	0.40	237.60	10,040.40	WO	HD	TR	_____
02/12/20	8003752	Confer with Receiver's office re case administration issues (0.3); prepare follow-up e-mail to SEC re outstanding motions and meet and confer matters (0.1).	Del Castillo, Joshua	0.40	237.60	10,278.00	WO	HD	TR	_____
02/18/20	8006989	e-mails and teleconference with counsel and attention to case administration matters (0.7).	Del Castillo, Joshua	0.70	415.80	10,693.80	WO	HD	TR	_____
02/25/20	8013306	Attention to case administration issues (0.5).	Del Castillo, Joshua	0.50	297.00	10,990.80	WO	HD	TR	_____
02/26/20	8013686	Confer with Receiver's office and counsel re administrative matters and pending motions and prepare updates and inquiries to SEC re same (1.0).	Del Castillo, Joshua	1.00	594.00	11,584.80	WO	HD	TR	_____
02/27/20	8015469	Review and respond to correspondence re outstanding administrative issues; teleconferences re same (1.2).	Del Castillo, Joshua	1.20	712.80	12,297.60	WO	HD	TR	_____

07/11/20 17:45:01 PROFORMA STATEMENT FOR MATTER 378224.00002 (Winkler, Geoff/Receiver for Essex Capita) (General Receivership)

**Fees for Matter 378224.00002.(General Receivership)**

<b>Trans Date</b>	<b>Index</b>	<b>Description of Service Rendered</b>	<b>Timekeeper</b>	<b>Hours</b>	<b>Fees</b>	<b>Sum</b>	<b>Circle</b>	<b>Action</b>		
02/27/20	8015531	Review and revise draft broker's agreement for sale of Procore shares, and confer with counsel re: the same (0.6).	Hsu, Tim	0.60	313.20	12,610.80	WO	HD	TR	_____
02/28/20	8016170	Follow up correspondence with Receiver on issues re: broker's agreement for sale of Procore shares, and respond to Receiver's inquiries re: the same (0.3).	Hsu, Tim	0.30	156.60	12,767.40	WO	HD	TR	_____
03/02/20	8025103	Attention to case administration matters and teleconferences and emails with Receiver and counsel re same (1.4); emails to SEC re same (0.1); attention to outstanding filings (0.5).	Del Castillo, Joshua	2.00	1,188.00	13,955.40	WO	HD	TR	_____
03/03/20	8025298	Analysis of issues re critical outstanding administrative motions, most efficient procedure and approach, and emails and teleconferences re same (1.5).	Del Castillo, Joshua	1.50	891.00	14,846.40	WO	HD	TR	_____
03/03/20	8051752	Review issues with sale of private shares and correspondence with counsel and Receiver re: the same (0.6).	Hsu, Tim	0.60	313.20	15,159.60	WO	HD	TR	_____
03/04/20	8027411	Confer with counsel and Receiver's office re outstanding administrative matters; prepare supplement to recent report to address developments in connection with pending settlement motion; prepare same for filing (1.7).	Del Castillo, Joshua	1.70	1,009.80	16,169.40	WO	HD	TR	_____
03/05/20	8028329	Assemble materials and prepare detailed memorandum in preparation for case administration call with SEC (1.1); emails and teleconferences regarding additional outstanding case administration tasks (0.7).	Del Castillo, Joshua	1.80	1,069.20	17,238.60	WO	HD	TR	_____

07/11/20 17:45:01 PROFORMA STATEMENT FOR MATTER 378224.00002 (Winkler, Geoff/Receiver for Essex Capita) (General Receivership)

**Fees for Matter 378224.00002.(General Receivership)**

<b>Trans Date</b>	<b>Index</b>	<b>Description of Service Rendered</b>	<b>Timekeeper</b>	<b>Hours</b>	<b>Fees</b>	<b>Sum</b>	<b>Circle</b>	<b>Action</b>		
03/06/20	8029262	Prepare for and teleconference with SEC; legal analysis and research regarding issues raised on call with SEC in connection with case administration (1.8).	Del Castillo, Joshua	1.80	1,069.20	18,307.80	WO	HD	TR	_____
03/09/20	8030332	Attention to case administration matters and confer with counsel and Receiver's office regarding same (0.5).	Del Castillo, Joshua	0.50	297.00	18,604.80	WO	HD	TR	_____
03/16/20	8038308	Review dockets and attention to receivership administration issues; confer with counsel regarding same;voicemails to third parties regarding same (1.7).	Del Castillo, Joshua	1.70	1,009.80	19,614.60	WO	HD	TR	_____
03/17/20	8038311	Attention to case administration matters and emails with Receiver's office and counsel regarding same (0.6).	Del Castillo, Joshua	0.60	356.40	19,971.00	WO	HD	TR	_____
03/18/20	8038331	Teleconferences with J. Hall and D. Zaro regarding pending case administration matters and attention to outstanding issues regarding same (1.2).	Del Castillo, Joshua	1.20	712.80	20,683.80	WO	HD	TR	_____
03/23/20	8042088	Attention to case administration matters and confer regarding same (0.5).	Del Castillo, Joshua	0.50	297.00	20,980.80	WO	HD	TR	_____
03/24/20	8043067	Emails and confer with counsel and Receiver's office regarding critical case administration issues (0.8).	Del Castillo, Joshua	0.80	475.20	21,456.00	WO	HD	TR	_____
03/25/20	8044140	Prepare for and teleconference with Receiver regarding outstanding administrative matters (0.5).	Del Castillo, Joshua	0.50	297.00	21,753.00	WO	HD	TR	_____

07/11/20 17:45:01 PROFORMA STATEMENT FOR MATTER 378224.00002 (Winkler, Geoff/Receiver for Essex Capita) (General Receivership)

**Fees for Matter 378224.00002.(General Receivership)**

Trans Date	Index	Description of Service Rendered	Timekeeper	Hours	Fees	Sum	Circle	Action		
03/28/20	8049055	Prepare draft ex parte application regarding case administration matters (2.6).	Del Castillo, Joshua	2.60	1,544.40	23,297.40	WO	HD	TR	_____
03/30/20	8048032	Attention to case administration matters, review recent orders, and confer with counsel and Receiver's office regarding same (1.0).	Del Castillo, Joshua	1.00	594.00	23,891.40	WO	HD	TR	_____
03/30/20	8051317	Review multiple orders entered by Court and confer with counsel regarding the same (.2).	Aspis, Norman	0.20	81.00	23,972.40	WO	HD	TR	_____

**Disbursements for Matter 378224.00002 (General Receivership)**

Trans Date	Index	Type	Quantity	Amt	Circle	Action		
01/01/20	60174	EDISC – File Conversion - E-Discovery - - CS Disco Inc., Monthly Hosting for January 2020^75199	1.00	1,303.80	WO	HD	TR	_____
01/03/20	193725	MSNGR – Messenger - - Nationwide Legal, LLC, USDC CENTRAL DISTRICT, DELIVER COURTESY^203641	1.00	24.15	WO	HD	TR	_____
01/06/20	193726	MSNGR – Messenger - - Nationwide Legal, LLC, USDC CENTRAL DISTRICT, DELIVER COURTESY^203641	1.00	4.20	WO	HD	TR	_____
01/07/20	193639	MSNGR – Messenger - - Nationwide Legal, LLC, USDC CENTRAL DISTRICT, DELIVER COURTESY^203641	1.00	4.20	WO	HD	TR	_____
01/08/20	187806	WP – Text Editing ^Create/Edit/Revise Word Documents USER DEFINED 1: 002369	0.20	6.00	WO	HD	TR	_____
01/09/20	193640	MSNGR – Messenger - - Nationwide Legal, LLC, USDC CENTRAL DISTRICT, DELIVER COURTESY^203641	1.00	4.20	WO	HD	TR	_____
01/10/20	74772	DUP – Duplication	93.00	17.67	WO	HD	TR	_____
01/10/20	74792	COLOR – Reprographics - Color	98.00	24.50	WO	HD	TR	_____
01/15/20	193602	MSNGR – Messenger - - Nationwide Legal, LLC, USDC CENTRAL DISTRICT, DELIVER COURTESY^203641	1.00	24.15	WO	HD	TR	_____

07/11/20 17:45:01 PROFORMA STATEMENT FOR MATTER 378224.00002 (Winkler, Geoff/Receiver for Essex Capita) (General Receivership)

**Disbursements for Matter 378224.00002 (General Receivership)**

Trans Date	Index	Type	Quantity	Amt				
02/01/20	190037	TECH – Tech Other Service - - CS Disco Inc., Monthly Hosting for February 2020^77251	1.00	962.25	WO	HD	TR	_____
02/10/20	105729	DCSRCH – Document Search - - WellsOne, PACER ^10/01/2019-12/31/2019 AP CARD^4406104Q42019	1.00	15.60	WO	HD	TR	_____
02/10/20	105751	DCSRCH – Document Search - - WellsOne, PACER ^10/01/2019-12/31/2019 AP CARD^4406104Q42019	1.00	6.00	WO	HD	TR	_____
02/28/20	2633418	ADV – Advance/Other Costs	2.20	0.00	WO	HD	TR	_____
03/01/20	2639179	EDISC – CS Disco Inc. - Monthly Hosting for March 2020	0.00	962.25	WO	HD	TR	_____
03/03/20	2637116	MSNGR – Nationwide Legal, LLC - USDC CENTRAL DISTRICT, DELIVER COURTESY	0.00	22.05	WO	HD	TR	_____
03/04/20	2639592	WP – TOC/TOA Generation	0.40	12.00	WO	HD	TR	_____
03/05/20	2637117	MSNGR – Nationwide Legal, LLC - USDC CENTRAL DISTRICT, DELIVER COURTESY	0.00	15.75	WO	HD	TR	_____

**Proforma Summary**

**Timekeeper**

Number	Timekeeper	Hours	Rate	Amounts
001842	Del Castillo, Joshua	29.50	594.00	17,523.00
002055	Hsu, Tim	12.20	522.00	6,368.40
002369	Aspis, Norman	0.20	405.00	81.00
		41.90		\$23,972.40
Subtotal Fees				\$23,972.40
Discount				0.00
Total Fees				23,972.40
Total Disbursements				3,408.77

**Attorney Billing Instructions**

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

07/11/20 17:45:01 PROFORMA STATEMENT FOR MATTER 378224.00002 (Winkler, Geoff/Receiver for Essex Capita) (General Receivership)

**Billing Instructions**

expires 6/30/2021: 10% off standard rates (automatic)

**Account Summary – As Of 07/11/20**

	Fiscal YTD			Calendar YTD			LTD		
	Total	Fees	Disb.	Total	Fees	Disb.	Total	Fees	Disbursements
Worked	395.10	395.10	0.00	38,871.47	35,462.70	3,408.77	27,381.17	23,972.40	3,408.77
Unbilled Adj	0.00	0.00	0.00	0.00	0.00	0.00	1,002.82	987.07	15.75
Billed	0.00	0.00	0.00	38,076.33	35,237.70	2,838.63	48,271.05	48,271.05	7,661.68
Collected	0.00	0.00	0.00	38,076.33	35,237.70	2,838.63	55,932.73	48,271.05	7,661.68
AR Write Off	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00
	<b>Total</b>	<b>Fees</b>	<b>Costs</b>						
<b>WIP</b>	<b>42,103.77</b>	<b>35,462.70</b>	<b>6,641.07</b>						
<b>Balance</b>									
<b>AR Balance</b>	<b>0.00</b>	<b>0.00</b>	<b>0.00</b>						
<b>Unalloc</b>	<b>0.00</b>								
<b>Payment</b>									
<b>Client Trust</b>	<b>0.00</b>								
<b>Balance</b>									

**Billing Address**

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

}

07/11/20 17:45:03 PROFORMA STATEMENT FOR MATTER 378224.00003 (Winkler, Geoff/Receiver for Essex Capita) (Asset Recovery & Management)

**Preliminary Billing Form**

Billing Atty: 001842 - Del Castillo,  
Joshua  
Date of Last Billing: 03/31/20  
Proforma Number: 1045150  
Client/Matter Joint Group # 378224-1

Matter #: 378224.00003

Client Name: Winkler, Geoff/Receiver for Essex Capita

Matter Name: Asset Recovery & Management

**Fees for Matter 378224.00003.(Asset Recovery & Management)**

<b>Trans Date</b>	<b>Index</b>	<b>Description of Service Rendered</b>	<b>Timekeeper</b>	<b>Hours</b>	<b>Fees</b>	<b>Sum</b>	<b>Circle</b>	<b>Action</b>		
01/02/20	120673	Review accounting conclusions transmitted by J. Hall and confer with counsel regarding the same (.4).	Aspis, Norman	0.40	162.00	162.00	WO	HD	TR	_____
01/03/20	133058	Detailed review of Receiver's net winner analysis and confer with counsel re litigation strategy re same (1.0).	Del Castillo, Joshua	1.00	594.00	756.00	WO	HD	TR	_____
01/06/20	27767	Confer with counsel, J. Hall, and G. Winkler regarding prospective disgorgement targets, sale of personal property assets, and case administration efforts (.5); confer with counsel regarding upcoming pleadings related to asset recovery and management and attendant case administration efforts (.6); confer with counsel regarding potential asset recovery against pre-receivership professionals (.2).	Aspis, Norman	1.30	526.50	1,282.50	WO	HD	TR	_____
01/06/20	33023	Prepare inquiry to buyer's counsel re status of Novasom purchase payment (0.1).	Del Castillo, Joshua	0.10	59.40	1,341.90	WO	HD	TR	_____



07/11/20 17:45:03 PROFORMA STATEMENT FOR MATTER 378224.00003 (Winkler, Geoff/Receiver for Essex Capita) (Asset Recovery &amp; Management)

**Fees for Matter 378224.00003.(Asset Recovery & Management)**

<b>Trans Date</b>	<b>Index</b>	<b>Description of Service Rendered</b>	<b>Timekeeper</b>	<b>Hours</b>	<b>Fees</b>	<b>Sum</b>	<b>Circle Action</b>			
01/07/20	27779	e-mails and attention to issues re Novasom sale (0.4).	Del Castillo, Joshua	0.40	237.60	1,579.50	WO	HD	TR	_____
01/08/20	33253	e-mails with buyer's counsel and Receiver re Novasom purchase (0.5).	Del Castillo, Joshua	0.50	297.00	1,876.50	WO	HD	TR	_____
01/09/20	122716	Review Perry and Wolansky Reply in Support of Motion for Relief from Stay and confer re same (0.5).	Del Castillo, Joshua	0.50	297.00	2,173.50	WO	HD	TR	_____
01/10/20	122687	Confer extensively with counsel re Grant accounting and prospective claim for return of receivership dollars; review associated documents; e-mails to Receiver's office re same (1.7).	Del Castillo, Joshua	1.70	1,009.80	3,183.30	WO	HD	TR	_____
01/14/20	24490	Correspondence with Receiver's office re asset recovery and collection matters and confer with counsel re same (1.5); review documents re same (1.0).	Del Castillo, Joshua	2.50	1,485.00	4,668.30	WO	HD	TR	_____
01/14/20	65630	Meeting with counsel, emails concerning the recovery of the equity interests, third party net winners, and analysis of strategy and issues.	Zaro, David	0.50	393.75	5,062.05	WO	HD	TR	_____
01/15/20	65634	Conferences with counsel related to pursuit of the equity interests (.4).	Zaro, David	0.40	315.00	5,377.05	WO	HD	TR	_____
01/15/20	65865	Review documents and confer with counsel re asset recovery issues (0.7).	Del Castillo, Joshua	0.70	415.80	5,792.85	WO	HD	TR	_____
01/16/20	55268	Teleconferences re CVL recovery issues (0.4).	Del Castillo, Joshua	0.40	237.60	6,030.45	WO	HD	TR	_____

07/11/20 17:45:03 PROFORMA STATEMENT FOR MATTER 378224.00003 (Winkler, Geoff/Receiver for Essex Capita) (Asset Recovery &amp; Management)

**Fees for Matter 378224.00003.(Asset Recovery & Management)**

<b>Trans Date</b>	<b>Index</b>	<b>Description of Service Rendered</b>	<b>Timekeeper</b>	<b>Hours</b>	<b>Fees</b>	<b>Sum</b>	<b>Circle</b>	<b>Action</b>		
01/17/20	61356	Review e-mails and documents relating to Receiver's asset recovery efforts and confer with counsel re same (0.8).	Del Castillo, Joshua	0.80	475.20	6,505.65	WO	HD	TR	_____
01/23/20	57724	Review Grant demand and confer with counsel re same (0.5); analysis of issues presented in Grant demand (1.1).	Del Castillo, Joshua	1.60	950.40	7,456.05	WO	HD	TR	_____
01/24/20	57986	Confer with counsel, review documents, and attention to asset recovery and administration matters (1.5).	Del Castillo, Joshua	1.50	891.00	8,347.05	WO	HD	TR	_____
01/25/20	52811	Review documents and attention to disgorgement analysis matters (1.4).	Del Castillo, Joshua	1.40	831.60	9,178.65	WO	HD	TR	_____
01/27/20	53027	Confer with G. Winkler, J. Hall, and counsel regarding issues in connection with particular investors and recovery efforts in connection therewith (.5).	Aspis, Norman	0.50	202.50	9,381.15	WO	HD	TR	_____
01/27/20	131582	Review and respond to inquiries from JPMorgan Chase re Penny Lane property (0.5); confer with counsel re relief from stay issues (0.3).	Del Castillo, Joshua	0.80	475.20	9,856.35	WO	HD	TR	_____
01/28/20	131931	Confer with counsel re proposed motion to approve disgorgement process and review associated documents (1.1).	Del Castillo, Joshua	1.10	653.40	10,509.75	WO	HD	TR	_____
01/30/20	136825	Confer with counsel re potential disgorgement recoveries, valuation, and attention to issues re same (1.3).	Del Castillo, Joshua	1.30	772.20	11,281.95	WO	HD	TR	_____
01/31/20	122043	e-mails, teleconferences, and review documents re asset recovery matters (2.1); teleconference with SEC re JPMorgan	Del Castillo, Joshua	2.60	1,544.40	12,826.35	WO	HD	TR	_____

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**Fees for Matter 378224.00003.(Asset Recovery & Management)**

Trans Date	Index	Description of Service Rendered	Timekeeper	Hours	Fees	Sum	Circle	Action		
		Chase request for relief from stay (0.3); finalize and file clarification re relief from stay (0.2).								
02/04/20	7995910	Review Grant settlement proposal and detailed accounting summary from counsel and e-mails and teleconferences re same; review proposed response and confer (1.1).	Del Castillo, Joshua	1.10	653.40	13,479.75	WO	HD	TR	_____
02/04/20	7996164	Meeting/conference with counsel to address the recovery from net winner investors (.3).	Zaro, David	0.30	236.25	13,716.00	WO	HD	TR	_____
02/04/20	7996530	Prepare motion to pursue disgorgement claims (4.8).	Aspis, Norman	4.80	1,944.00	15,660.00	WO	HD	TR	_____
02/06/20	7998791	Review memo and confer with counsel re prospective claims against JG in connection with voidable transfers; confer re potential settlement proposal (0.9).	Del Castillo, Joshua	0.90	534.60	16,194.60	WO	HD	TR	_____
02/10/20	8001132	Teleconference with SEC and JPMorgan Chase re request for relief from stay re Penny Lane (0.2); e-mails and teleconferences re prospective assignment of payment to Receiver (0.3).	Del Castillo, Joshua	0.50	297.00	16,491.60	WO	HD	TR	_____
02/11/20	8002205	Confer with counsel re prospective professional liability claims against pre-receivership professionals; initial review of recently recovered documents (1.6).	Del Castillo, Joshua	1.60	950.40	17,442.00	WO	HD	TR	_____
02/12/20	8002803	Analyze and evaluate relevant statutes of limitations (0.4).	Kenney, Suzanne	0.40	120.60	17,562.60	WO	HD	TR	_____

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**Fees for Matter 378224.00003.(Asset Recovery & Management)**

<b>Trans Date</b>	<b>Index</b>	<b>Description of Service Rendered</b>	<b>Timekeeper</b>	<b>Hours</b>	<b>Fees</b>	<b>Sum</b>	<b>Circle</b>	<b>Action</b>		
02/12/20	8003733	Review documents and confer with counsel in connection with prospective asset recovery litigation (3.3).	Del Castillo, Joshua	3.30	1,960.20	19,522.80	WO	HD	TR	_____
02/13/20	8004772	e-mails, teleconference, and review documents re proposed Grant settlement (1.2).	Del Castillo, Joshua	1.20	712.80	20,235.60	WO	HD	TR	_____
02/13/20	8004914	Several emails, evaluate approach to counter offer with counsel for Grant, assess approach to recover as to voidable transfers (.6).	Zaro, David	0.60	472.50	20,708.10	WO	HD	TR	_____
02/14/20	8005110	Analyze and evaluate strategy for asset recovery; analyze and evaluate claims based on professional negligence, fraud, and breach of fiduciary duty (1.5). Draft memorandum re same (0.6).	Kenney, Suzanne	2.10	633.15	21,341.25	WO	HD	TR	_____
02/14/20	8005568	Analyze and evaluate requirements of legal disability (0.8). Review and revise memorandum re asset recovery strategy (0.2).	Kenney, Suzanne	1.00	301.50	21,642.75	WO	HD	TR	_____
02/14/20	8005727	Review memoranda and (1.4).	Del Castillo, Joshua	1.40	831.60	22,474.35	WO	HD	TR	_____
02/18/20	8006951	Confer with counsel re Grant settlement proposals and e-mails re same (0.5).	Del Castillo, Joshua	0.50	297.00	22,771.35	WO	HD	TR	_____
02/18/20	8007428	Conference with/advice to counsel concerning the mediation as to Medina/Martin loans, the voidable transfer claims, follow-up on mediation brief (.6). Address the voidable transfer issues, call with counsel (.5).	Zaro, David	1.10	866.25	23,637.60	WO	HD	TR	_____

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**Fees for Matter 378224.00003.(Asset Recovery & Management)**

<b>Trans Date</b>	<b>Index</b>	<b>Description of Service Rendered</b>	<b>Timekeeper</b>	<b>Hours</b>	<b>Fees</b>	<b>Sum</b>	<b>Circle</b>	<b>Action</b>		
02/20/20	8009808	Attention to asset recovery issues and e-mails with Receiver and counsel re same (0.9); review documents and confer (0.5); e-mails and teleconferences re Grant settlement proposal and analysis of recent revised accounting re same; confer with counsel and Receiver (1.0).	Del Castillo, Joshua	2.40	1,425.60	25,063.20	WO	HD	TR	_____
02/20/20	8010009	Meet and confer re legal disability (0.1). draft memorandum re same (0.1).	Kenney, Suzanne	0.20	60.30	25,123.50	WO	HD	TR	_____
02/21/20	8010416	Review materials forwarded by Receiver and attention to prospective additional asset recovery efforts (1.2); confer with counsel re status of Garipalli settlement decision (0.3).	Del Castillo, Joshua	1.50	891.00	26,014.50	WO	HD	TR	_____
02/24/20	8011823	Confer with counsel re potential claims against pre-receivership professionals; review documents in connection with same (0.8).	Del Castillo, Joshua	0.80	475.20	26,489.70	WO	HD	TR	_____
02/24/20	8012045	Confer with counsel regarding CVL (.4); review documents and draft email regarding the same (.5); review motion for authority to sell personal property and revise the same (.6); prepare supporting declaration and proposed order for motion for authority to sell personal property (.6).	Aspis, Norman	2.10	850.50	27,340.20	WO	HD	TR	_____
02/24/20	8012473	Meet and confer re strategy for recovering receivership assets (0.4). Analyze and evaluate relevant documents re same (1.1).	Kenney, Suzanne	1.50	452.25	27,792.45	WO	HD	TR	_____
02/25/20	8013257	Confer with counsel re outstanding asset recovery tasks; e-mails to third parties re	Del Castillo, Joshua	1.00	594.00	28,386.45	WO	HD	TR	_____

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**Fees for Matter 378224.00003.(Asset Recovery & Management)**

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02/29/20	8016452	Analyze and evaluate strategy to recover receivership assets. Review documents re same (1.0).	Kenney, Suzanne	2.00	603.00	28,989.45	WO	HD	TR	_____
03/02/20	8031535	Confer with counsel regarding draft letter in connection with asset recovery efforts related to CVL (.8); review, revise, and finalize motion for authority to sell personal property (.4).	Aspis, Norman	1.20	486.00	29,475.45	WO	HD	TR	_____
03/02/20	8034274	Meet and confer with counsel re asset recovery (0.6). Analyze and evaluate relevant documents; begin drafting memorandum regarding asset recovery strategy (1.4).	Kenney, Suzanne	2.00	603.00	30,078.45	WO	HD	TR	_____
03/03/20	8025268	Emails and teleconferences with counsel re asset recovery matters (0.7).	Del Castillo, Joshua	0.70	415.80	30,494.25	WO	HD	TR	_____
03/03/20	8031468	Confer with counsel regarding draft demand letter in connection with asset recovery efforts related to CVL (.3).	Aspis, Norman	0.30	121.50	30,615.75	WO	HD	TR	_____
03/03/20	8034283	Analyze and evaluate relevant documents in support of asset recovery strategy regarding CVL; continue drafting memorandum regarding asset recovery strategy; analyze and evaluate professional rules of conduct; analyze and evaluate negligence (2.40).	Kenney, Suzanne	2.40	723.60	31,339.35	WO	HD	TR	_____
03/04/20	8031362	Confer with counsel regarding draft letter in connection with certain asset recovery issues in connection with CVL (.2).	Aspis, Norman	0.20	81.00	31,420.35	WO	HD	TR	_____

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**Fees for Matter 378224.00003.(Asset Recovery & Management)**

<b>Trans Date</b>	<b>Index</b>	<b>Description of Service Rendered</b>	<b>Timekeeper</b>	<b>Hours</b>	<b>Fees</b>	<b>Sum</b>	<b>Circle</b>	<b>Action</b>		
03/04/20	8034293	Analyze and evaluate strategy for asset recovery; analyze and evaluate claims for asset recovery based on negligence, breach of fiduciary duty, and aiding and abetting torts; analyze and evaluate relevant documents; draft correspondence regarding strategy for asset recovery (7.0).	Kenney, Suzanne	7.00	2,110.50	33,530.85	WO	HD	TR	_____
03/05/20	8028974	Confer with counsel regarding CVL matter and request to commence action, along with related, prospective professional claims (0.7).	Del Castillo, Joshua	0.70	415.80	33,946.65	WO	HD	TR	_____
03/06/20	8030110	Confer with counsel and D. Miller regarding disgorgement efforts the Receiver's forthcoming motion/stipulation regarding the same (.3); review draft letter to third-party recipient regarding potential recovery of funds for receivership estate (.3).	Aspis, Norman	0.60	243.00	34,189.65	WO	HD	TR	_____
03/10/20	8031667	Review documents provided by Receiver's office in connection with prospective third party recover efforts; legal analysis of same (1.3); confer with counsel regarding prospective Grant recovery/settlement (0.5).	Del Castillo, Joshua	1.80	1,069.20	35,258.85	WO	HD	TR	_____
03/11/20	8038373	Draft and revise stipulation regarding disgorgement procedures and confer with counsel regarding the same (4.3); draft and revise proposed order regarding disgorgement procedures (.4); draft and revise letter regarding potential claim against pre-receivership service provider.	Aspis, Norman	4.70	1,903.50	37,162.35	WO	HD	TR	_____

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**Fees for Matter 378224.00003.(Asset Recovery & Management)**

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03/12/20	8033821	Review and revise draft stipulation regarding disgorgement claims and confer with counsel regarding same (1.2); emails with Receiver's office regarding same (0.5); review draft release and email with counsel regarding Perry proposal for quasi-settlement (0.3).	Del Castillo, Joshua	2.00	1,188.00	38,350.35	WO	HD	TR	_____
03/12/20	8038379	Review and revise stipulation regarding disgorgement procedures and corresponding proposed order, and confer with counsel regarding the same (1); transmit stipulation and proposed order to G. Winkler (.2).	Aspis, Norman	1.20	486.00	38,836.35	WO	HD	TR	_____
03/13/20	8037741	Follow-up on prior emails, research and draft email to Receiver reflecting the results of analysis as to grant UVTA, fraudulent conveyance arguments claims settlement, possible offer/counter offer (1.2). Follow-up on prior emails and rsearch (.4).	Zaro, David	1.60	1,260.00	40,096.35	WO	HD	TR	_____
03/13/20	8038276	Review sources of information regarding disgorgement recovery efforts and payout to claimants (.8); confer with counsel regarding the same (.2).	Aspis, Norman	1.00	405.00	40,501.35	WO	HD	TR	_____
03/19/20	8039740	Emails with Receiver and counsel regarding anticipated disgorgement procedures and accounting for net winners/profitting investors (0.6).	Del Castillo, Joshua	0.60	356.40	40,857.75	WO	HD	TR	_____
03/19/20	8053256	Attention to correspondence regarding disgorgement efforts (.2).	Aspis, Norman	0.20	81.00	40,938.75	WO	HD	TR	_____



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**Fees for Matter 378224.00003.(Asset Recovery & Management)**

<b>Trans Date</b>	<b>Index</b>	<b>Description of Service Rendered</b>	<b>Timekeeper</b>	<b>Hours</b>	<b>Fees</b>	<b>Sum</b>	<b>Circle</b>	<b>Action</b>		
03/20/20	8041905	Emails and teleconferences regarding anticipated disgorgement efforts; legal analysis of issues presented by Receiver's office (2.5).	Del Castillo, Joshua	2.50	1,485.00	42,423.75	WO	HD	TR	_____
03/23/20	8042083	Complete revisions to stipulation to establish disgorgement litigation and settlement procedures and deliver to SEC to meet and confer regarding same (0.8); review and revise draft order thereon (0.3); correspondence with Receiver's office (0.3).	Del Castillo, Joshua	1.40	831.60	43,255.35	WO	HD	TR	_____
03/23/20	8046650	Draft and revise proposed order regarding disgorgement stipulation (.3).	Aspis, Norman	0.30	121.50	43,376.85	WO	HD	TR	_____
03/24/20	8045330	Analysis of the issues related to third party recoveries and follow-up with counsel (.3). Address the draft of the motion concerning third party recoveries (.3). Call with counsel related to stipulated motion (.2).	Zaro, David	0.80	630.00	44,006.85	WO	HD	TR	_____
03/25/20	8044141	Finalize disgorgement and settlement stipulation and prepare for filing (0.3).	Del Castillo, Joshua	0.30	178.20	44,185.05	WO	HD	TR	_____
03/30/20	8048035	Review and revise demand letter to pre-receivership professionals (0.7); confer with counsel regarding same (0.5).	Del Castillo, Joshua	1.20	712.80	44,897.85	WO	HD	TR	_____
03/30/20	8051316	Confer with counsel regarding demand letter to pre-receivership service provider (.2).	Aspis, Norman	0.20	81.00	44,978.85	WO	HD	TR	_____
03/31/20	8049711	Emails and teleconferences regarding disgorgement matters; review template disgorgement complaint and attention to issues regarding same (1.3); review and	Del Castillo, Joshua	2.40	1,425.60	46,404.45	WO	HD	TR	_____

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**Fees for Matter 378224.00003.(Asset Recovery & Management)**

Trans Date	Index	Description of Service Rendered	Timekeeper	Hours	Fees	Sum	Circle	Action
		substantially revise demand letter t pre-receivership professionals (1.1).						
03/31/20	8051240	Review and revise demand letter to pre-receivership professionals, and confer with counsel regarding the same (1.1).	Aspis, Norman	1.10	445.50	46,849.95	WO	HD TR

**Disbursements for Matter 378224.00003 (Asset Recovery & Management)**

Trans Date	Index	Type	Quantity	Amt	Circle	Action
03/04/20	2639591	WP – Format Document	0.70	21.00	WO	HD TR
03/23/20	2641360	WP – Create/Edit/Revise Word Documents	0.10	3.00	WO	HD TR

**Proforma Summary**

Timekeeper Number	Timekeeper	Hours	Rate	Amounts
000313	Zaro, David	5.30	787.50	4,173.75
001842	Del Castillo, Joshua	48.70	594.00	28,927.80
002343	Kenney, Suzanne	18.60	301.50	5,607.90
002369	Aspis, Norman	20.10	405.00	8,140.50
		<u>92.70</u>		<u>\$46,849.95</u>
Subtotal Fees				\$46,849.95
Discount				0.00
Total Fees				46,849.95
Total Disbursements				24.00

**Attorney Billing Instructions**

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

07/11/20 17:45:03 PROFORMA STATEMENT FOR MATTER 378224.00003 (Winkler, Geoff/Receiver for Essex Capita) (Asset Recovery & Management)

**Billing Instructions**

expires 6/30/2021: 10% off standard rates (automatic)

**Account Summary – As Of 07/11/20**

	Fiscal YTD			Calendar YTD			LTD		
	Total	Fees	Disb.	Total	Fees	Disb.	Total	Fees	Disbursements
Worked	4,644.90	4,140.90	504.00	145,376.25	145,352.25	24.00	46,873.95	46,849.95	24.00
Unbilled Adj	0.00	0.00	0.00	0.00	0.00	0.00	6,682.95	6,682.95	0.00
Billed	0.00	0.00	0.00	125,414.10	125,414.10	0.00	200,965.14	200,965.14	0.00
Collected	0.00	0.00	0.00	125,414.10	125,414.10	0.00	200,965.14	200,965.14	0.00
AR Write Off	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00
	<b>Total</b>	<b>Fees</b>	<b>Costs</b>						
<b>WIP</b>	<b>145,394.75</b>	<b>145,352.25</b>	<b>42.50</b>						
<b>Balance</b>									
<b>AR Balance</b>	<b>0.00</b>	<b>0.00</b>	<b>0.00</b>						
<b>Unalloc</b>	<b>0.00</b>								
<b>Payment</b>									
<b>Client Trust</b>	<b>0.00</b>								
<b>Balance</b>									

**Billing Address**

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

}

07/11/20 17:45:06 PROFORMA STATEMENT FOR MATTER 378224.00004 (Winkler, Geoff/Receiver for Essex Capita) (Investigation/Reporting)

**Preliminary Billing Form**

Billing Atty: 001842 - Del Castillo,  
Joshua

Matter #: 378224.00004

Client Name: Winkler, Geoff/Receiver for Essex Capita

Date of Last Billing: 03/31/20

Matter Name: Investigation/Reporting

Proforma Number: 1045150

Client/Matter Joint Group # 378224-1

**Fees for Matter 378224.00004.(Investigation/Reporting)**

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01/02/20	120674	Review production from JPMorgan Chase and correspond with counsel regarding the same (.3).	Aspis, Norman	0.30	121.50	121.50	WO	HD	TR	_____
01/03/20	124238	Confer with counsel regarding JPMorgan Chase subpoena and corresponding production (.3).	Aspis, Norman	0.30	121.50	243.00	WO	HD	TR	_____
01/03/20	133088	e-mails and confer with counsel re document production issues (0.5).	Del Castillo, Joshua	0.50	297.00	540.00	WO	HD	TR	_____
01/13/20	30567	Prepare for and extended teleconferences and e-mails re Grant accounting (1.5).	Del Castillo, Joshua	1.50	891.00	1,431.00	WO	HD	TR	_____
01/13/20	30568	Review documents and teleconference with J. Hall re Grant accounting conclusions (0.9).	Del Castillo, Joshua	0.90	534.60	1,965.60	WO	HD	TR	_____
01/23/20	57772	Confer with counsel regarding status of fourth interim report and other forthcoming filings (.4).	Aspis, Norman	0.40	162.00	2,127.60	WO	HD	TR	_____

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**Fees for Matter 378224.00004.(Investigation/Reporting)**

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01/27/20	53028	Draft and revise fourth interim report and petition for further instructions (5.8); confer with counsel regarding the same (.4).	Aspis, Norman	6.20	2,511.00	4,638.60	WO	HD	TR	_____
01/27/20	131583	Review and respond to e-mails and voicemails re document requests (0.6).	Del Castillo, Joshua	0.60	356.40	4,995.00	WO	HD	TR	_____
01/28/20	121345	Revise and finalize fourth interim report and petition for further instructions, and confer with counsel regarding the same (.4).	Aspis, Norman	0.40	162.00	5,157.00	WO	HD	TR	_____
01/28/20	131932	Review and revise draft Fourth Interim Report and confer re same (0.9).	Del Castillo, Joshua	0.90	534.60	5,691.60	WO	HD	TR	_____
01/29/20	51605	Review and revise draft NDA in connection with asset investigation (0.8).	Del Castillo, Joshua	0.80	475.20	6,166.80	WO	HD	TR	_____
01/30/20	53013	Review fourth interim report and confer with counsel regarding the same (.3); transmit the same to G. Winkler and J. Hall with overview (.2).	Aspis, Norman	0.50	202.50	6,369.30	WO	HD	TR	_____
02/04/20	7996281	Review and assess Grant's latest response to demands, confer with counsel re: the same, and prepare detailed insert re: possible claim for fraudulent transfer (1.9).	Hsu, Tim	1.90	991.80	7,361.10	WO	HD	TR	_____
02/05/20	7997493	Review additions to draft Fourth Interim Report and teleconferences and e-mails with counsel re same (1.0).	Del Castillo, Joshua	1.00	594.00	7,955.10	WO	HD	TR	_____
02/05/20	8024599	Review and revise fourth interim report and petition for further instructions (.6).	Aspis, Norman	0.60	243.00	8,198.10	WO	HD	TR	_____

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**Fees for Matter 378224.00004.(Investigation/Reporting)**

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02/06/20	7998773	Prepare additional revisions to Fourth Interim Report and e-mails and teleconferences with counsel and Receiver's office re same (1.3).	Del Castillo, Joshua	1.30	772.20	8,970.30	WO	HD	TR	_____
02/06/20	7998801	Correspondence and call with Receiver's staff and counsel to discuss next steps for demands to Grant (0.6).	Hsu, Tim	0.60	313.20	9,283.50	WO	HD	TR	_____
02/06/20	8025155	Confer with counsel regarding fourth interim report and petition for further instructions (.2).	Aspis, Norman	0.20	81.00	9,364.50	WO	HD	TR	_____
02/25/20	8012913	Confer with counsel regarding potential claim against pre-receivership service provider (.3).	Aspis, Norman	0.30	121.50	9,486.00	WO	HD	TR	_____
02/27/20	8015742	Review fourth interim report in anticipation of filing (.2).	Aspis, Norman	0.20	81.00	9,567.00	WO	HD	TR	_____
02/28/20	8016048	Review and finalize fourth interim report for filing (.5).	Aspis, Norman	0.50	202.50	9,769.50	WO	HD	TR	_____
02/28/20	8023093	Evaluate draft report by Receiver, revise/finalize draft and advice to counsel (.60).	Zaro, David	0.60	472.50	10,242.00	WO	HD	TR	_____
03/02/20	8031548	Review, revise, and finalize fourth interim report for filing (1.2).	Aspis, Norman	1.20	486.00	10,728.00	WO	HD	TR	_____
03/04/20	8028222	Analysis of the approach/strategy, revise draft of the supplemental report of Receiver, advice to counsel regarding same.	Zaro, David	1.10	866.25	11,594.25	WO	HD	TR	_____
03/09/20	8053592	Confer with J. Hall and counsel regarding accounting report in Essex (.7).	Aspis, Norman	0.70	283.50	11,877.75	WO	HD	TR	_____

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**Fees for Matter 378224.00004.(Investigation/Reporting)**

Trans Date	Index	Description of Service Rendered	Timekeeper	Hours	Fees	Sum	Circle	Action		
03/11/20	8033162	Confer with counsel regarding anticipated accounting report (0.6); emails with Receiver's office and counsel regarding same (0.5).	Del Castillo, Joshua	1.10	653.40	12,531.15	WO	HD	TR	_____
03/13/20	8037572	Research/analysis of the fraudulent conveyance, UVTA claims, follow-up review of records (1.1). Meeting with counsel related to UVTA analysis and research issues (.4).	Zaro, David	1.50	1,181.25	13,712.40	WO	HD	TR	_____
03/19/20	8039562	Confer with Receiver's office and counsel regarding forensic accounting report (0.8).	Del Castillo, Joshua	0.80	475.20	14,187.60	WO	HD	TR	_____
03/26/20	8045672	Emails with Receiver's office regarding forensic accounting matters; confer with counsel regarding anticipated forensic accounting report (0.9).	Del Castillo, Joshua	0.90	534.60	14,722.20	WO	HD	TR	_____
03/30/20	8051341	Call/email with counsel regarding the accounting and records to support the third party actions, foundation issues and proposed discovery (.4).	Zaro, David	0.40	315.00	15,037.20	WO	HD	TR	_____

**Proforma Summary**

Timekeeper Number	Timekeeper	Hours	Rate	Amounts
000313	Zaro, David	3.60	787.50	2,835.00
001842	Del Castillo, Joshua	10.30	594.00	6,118.20
002055	Hsu, Tim	2.50	522.00	1,305.00
002369	Aspis, Norman	11.80	405.00	4,779.00
		<u>28.20</u>		<u>\$15,037.20</u>
Subtotal Fees				\$15,037.20
Discount				0.00

07/11/20 17:45:06 PROFORMA STATEMENT FOR MATTER 378224.00004 (Winkler, Geoff/Receiver for Essex Capita) (Investigation/Reporting)

**Proforma Summary**

**Timekeeper**

Number	Timekeeper	Hours	Rate	Amounts
	Total Fees			15,037.20
	Total Disbursements			0.00

**Attorney Billing Instructions**

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

**Billing Instructions**

expires 6/30/2021: 10% off standard rates (automatic)

**Account Summary – As Of 07/11/20**

	Fiscal YTD			Calendar YTD			LTD		
	Total	Fees	Disb.	Total	Fees	Disb.	Total	Fees	Disbursements
Worked	0.00	0.00	0.00	57,538.80	57,538.80	0.00	15,037.20	15,037.20	0.00
Unbilled Adj	0.00	0.00	0.00	0.00	0.00	0.00	10,188.81	10,188.81	0.00
Billed	0.00	0.00	0.00	26,186.19	26,135.19	51.00	116,113.14	116,113.14	100.02
Collected	0.00	0.00	0.00	26,186.19	26,135.19	51.00	116,213.16	116,113.14	100.02
AR Write Off	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00
<b>WIP</b>	<b>57,538.80</b>	<b>57,538.80</b>	<b>0.00</b>						
<b>Balance</b>									
<b>AR Balance</b>	<b>0.00</b>	<b>0.00</b>	<b>0.00</b>						
<b>Unalloc</b>	<b>0.00</b>								
<b>Payment</b>									
<b>Client Trust</b>	<b>0.00</b>								
<b>Balance</b>									

**Billing Address**

Winkler, Geoff/Receiver for Essex Capital Corporation  
 Geoff Winkler  
 Managing Director



**EXHIBIT B**

07/11/20 17:45:06 PROFORMA STATEMENT FOR MATTER 378224.00004 (Winkler, Geoff/Receiver for Essex Capita) (Investigation/Reporting)

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

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07/11/20 17:45:08 PROFORMA STATEMENT FOR MATTER 378224.00005 (Winkler, Geoff/Receiver for Essex Capita) (Investor Issues/Communications)

**Preliminary Billing Form**

Billing Atty: 001842 - Del Castillo, Joshua  
 Date of Last Billing: 03/31/20  
 Proforma Number: 1045150  
 Client/Matter Joint Group # 378224-1

Matter #: 378224.00005

Client Name: Winkler, Geoff/Receiver for Essex Capita  
 Matter Name: Investor Issues/Communications

**Fees for Matter 378224.00005.(Investor Issues/Communications)**

Trans Date	Index	Description of Service Rendered	Timekeeper	Hours	Fees	Sum	Circle	Action
02/06/20	7998646	Email to investor concerning claims/distribution process (.2).	Zaro, David	0.20	157.50	157.50	WO	HD TR

**Proforma Summary**

Timekeeper Number	Timekeeper	Hours	Rate	Amounts
000313	Zaro, David	0.20	787.50	157.50
		0.20		\$157.50
Subtotal Fees				\$157.50
Discount				0.00
Total Fees				157.50
Total Disbursements				0.00

**Attorney Billing Instructions**

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

**Billing Instructions**

expires 6/30/2021: 10% off standard rates (automatic)

07/11/20 17:45:08 PROFORMA STATEMENT FOR MATTER 378224.00005 (Winkler, Geoff/Receiver for Essex Capita) (Investor Issues/Communications)

**Account Summary – As Of 07/11/20**

	Fiscal YTD			Calendar YTD			LTD		
	Total	Fees	Disb.	Total	Fees	Disb.	Total	Fees	Disbursements
Worked	0.00	0.00	0.00	535.50	535.50	0.00	157.50	157.50	0.00
Unbilled Adj	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00
Billed	0.00	0.00	0.00	1,485.00	1,485.00	0.00	11,954.25	11,954.25	0.00
Collected	0.00	0.00	0.00	1,485.00	1,485.00	0.00	11,954.25	11,954.25	0.00
AR Write Off	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00
	<b>Total</b>	<b>Fees</b>	<b>Costs</b>						
<b>WIP</b>	<b>535.50</b>	<b>535.50</b>	<b>0.00</b>						
<b>Balance</b>									
<b>AR Balance</b>	<b>0.00</b>	<b>0.00</b>	<b>0.00</b>						
<b>Unalloc</b>	<b>0.00</b>								
<b>Payment</b>									
<b>Client Trust</b>	<b>0.00</b>								
<b>Balance</b>									

**Billing Address**

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

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07/11/20 17:45:11 PROFORMA STATEMENT FOR MATTER 378224.00006 (Winkler, Geoff/Receiver for Essex Capita) (Sale/Disposition/Transfer of Assets)

**Preliminary Billing Form**Billing Atty: 001842 - Del Castillo,  
Joshua

Matter #: 378224.00006

Client Name: Winkler, Geoff/Receiver for Essex Capita

Date of Last Billing: 03/31/20

Matter Name: Sale/Disposition/Transfer of Assets

Proforma Number: 1045150

Client/Matter Joint Group # 378224-1

**Fees for Matter 378224.00006.(Sale/Disposition/Transfer of Assets)**

<b>Trans Date</b>	<b>Index</b>	<b>Description of Service Rendered</b>	<b>Timekeeper</b>	<b>Hours</b>	<b>Fees</b>	<b>Sum</b>	<b>Circle</b>	<b>Action</b>		
01/02/20	132955	Review updated asset chart and revisit draft motion to establish sales procedures for personalty (0.9); confer with counsel re same (0.5).	Del Castillo, Joshua	1.40	831.60	831.60	WO	HD	TR	_____
01/09/20	122718	Additional analysis of sale issues and substantially revise personalty sale motion (1.2).	Del Castillo, Joshua	1.20	712.80	1,544.40	WO	HD	TR	_____
01/09/20	122955	Call with counsel related to sale of the personal property assets/interests (.2). Work/revise draft motion related to sale process for the personal property assets (.5).	Zaro, David	0.70	551.25	2,095.65	WO	HD	TR	_____
01/10/20	122689	Confer with counsel re receivership assets sale matters and attention to administrative issues re same (0.9).	Del Castillo, Joshua	0.90	534.60	2,630.25	WO	HD	TR	_____
01/27/20	52611	Confer with counsel concerning the asset sale, follow-up re strategy.	Zaro, David	0.30	236.25	2,866.50	WO	HD	TR	_____

07/11/20 17:45:11 PROFORMA STATEMENT FOR MATTER 378224.00006 (Winkler, Geoff/Receiver for Essex Capita) (Sale/Disposition/Transfer of Assets)

**Fees for Matter 378224.00006.(Sale/Disposition/Transfer of Assets)**

<b>Trans Date</b>	<b>Index</b>	<b>Description of Service Rendered</b>	<b>Timekeeper</b>	<b>Hours</b>	<b>Fees</b>	<b>Sum</b>	<b>Circle</b>	<b>Action</b>		
01/28/20	131935	Review documents in connection with anticipated sale of receivership personal property (1.3).	Del Castillo, Joshua	1.30	772.20	3,638.70	WO	HD	TR	_____
01/30/20	136829	Finalize loan sale materials for filing and supervise same (0.3); confer with court re proof of service and prepare necessary motion to substitute proof of service documents (1.0); e-mail to buyer re filing of motion and confer re next steps (0.4).	Del Castillo, Joshua	1.70	1,009.80	4,648.50	WO	HD	TR	_____
01/30/20	136830	Attention to NEOS sale issues (0.2).	Del Castillo, Joshua	0.20	118.80	4,767.30	WO	HD	TR	_____
02/06/20	7998772	e-mails and teleconferences re asset sale issues (0.9).	Del Castillo, Joshua	0.90	534.60	5,301.90	WO	HD	TR	_____
02/24/20	8012087	e-mails and confer with counsel and attention to asset sale issues (0.9).	Del Castillo, Joshua	0.90	534.60	5,836.50	WO	HD	TR	_____
02/26/20	8014672	Confer with counsel regarding motion for sale of personal property (.2).	Aspis, Norman	0.20	81.00	5,917.50	WO	HD	TR	_____
02/27/20	8015414	Emails and teleconferences re motion to establish sales procedures (0.6).	Del Castillo, Joshua	0.60	356.40	6,273.90	WO	HD	TR	_____
02/27/20	8015747	Review broker's agreement regarding Procore shares and confer with counsel regarding the same (.5).	Aspis, Norman	0.50	202.50	6,476.40	WO	HD	TR	_____
02/28/20	8016242	Review motion for authority to sell personal property and confer with counsel regarding the same (.6); confer with counsel regarding Setter agreement (.2).	Aspis, Norman	0.80	324.00	6,800.40	WO	HD	TR	_____

07/11/20 17:45:11 PROFORMA STATEMENT FOR MATTER 378224.00006 (Winkler, Geoff/Receiver for Essex Capita) (Sale/Disposition/Transfer of Assets)

**Fees for Matter 378224.00006.(Sale/Disposition/Transfer of Assets)**

<b>Trans Date</b>	<b>Index</b>	<b>Description of Service Rendered</b>	<b>Timekeeper</b>	<b>Hours</b>	<b>Fees</b>	<b>Sum</b>	<b>Circle Action</b>			
02/28/20	8023067	Analysis of the draft motion for approval of personal property assets/equity interest, supporting declaration and order, advice to counsel re revisions (.8). Follow-up call re sale process (.4).	Zaro, David	1.20	945.00	7,745.40	WO	HD	TR	_____
03/02/20	8025512	Evaluate final sale motion draft, advice to counsel (.5). Follow-up with Receiver and counsel concerning pending sales motion, strategy for proceeding in light pace of court proceedings (.6).	Zaro, David	1.10	866.25	8,611.65	WO	HD	TR	_____
03/03/20	8027062	Review and confer with counsel re issues re Receiver's anticipated sale of personal property assets; legal analysis re same (1.2).	Del Castillo, Joshua	1.20	712.80	9,324.45	WO	HD	TR	_____
03/03/20	8028186	Review the issues regarding broker agreement, assess alternative sales strategy related to the Pro-Core stock sale, advice to counsel regarding same (.4).	Zaro, David	0.40	315.00	9,639.45	WO	HD	TR	_____
03/04/20	8027421	Confer with counsel and analysis of issues re prospective sale of private equity holdings (1.1).	Del Castillo, Joshua	1.10	653.40	10,292.85	WO	HD	TR	_____
03/31/20	8049932	Attention to personal property sale issues and confer with Receiver's office regarding same (0.5); emails regarding same (0.3).	Del Castillo, Joshua	0.80	475.20	10,768.05	WO	HD	TR	_____

**Proforma Summary**

<b>Timekeeper Number</b>	<b>Timekeeper</b>	<b>Hours</b>	<b>Rate</b>	<b>Amounts</b>
000313	Zaro, David	3.70	787.50	2,913.75
001842	Del Castillo, Joshua	12.20	594.00	7,246.80

07/11/20 17:45:11 PROFORMA STATEMENT FOR MATTER 378224.00006 (Winkler, Geoff/Receiver for Essex Capita) (Sale/Disposition/Transfer of Assets)

**Proforma Summary**

**Timekeeper**

Number	Timekeeper	Hours	Rate	Amounts
002369	Aspis, Norman	1.50	405.00	607.50
		17.40		\$10,768.05
Subtotal Fees				\$10,768.05
Discount				0.00
Total Fees				10,768.05
Total Disbursements				0.00

**Attorney Billing Instructions**

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

**Billing Instructions**

expires 6/30/2021: 10% off standard rates (automatic)

**Account Summary – As Of 07/11/20**

	Fiscal YTD			Calendar YTD			LTD		
	Total	Fees	Disb.	Total	Fees	Disb.	Total	Fees	Disbursements
Worked	0.00	0.00	0.00	14,699.70	14,699.70	0.00	10,768.05	10,768.05	0.00
Unbilled Adj	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00
Billed	0.00	0.00	0.00	20,291.85	20,291.85	0.00	22,766.85	22,766.85	0.00
Collected	0.00	0.00	0.00	20,291.85	20,291.85	0.00	22,766.85	22,766.85	0.00
AR Write Off	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00
<b>WIP</b>	<b>14,699.70</b>	<b>14,699.70</b>	<b>0.00</b>						
<b>Balance</b>									
<b>AR Balance</b>	<b>0.00</b>	<b>0.00</b>	<b>0.00</b>						
<b>Unalloc</b>	<b>0.00</b>								
<b>Payment</b>									
<b>Client Trust</b>	<b>0.00</b>								
<b>Balance</b>									

**EXHIBIT B**  
#4176

07/11/20 17:45:11 PROFORMA STATEMENT FOR MATTER 378224.00006 (Winkler, Geoff/Receiver for Essex Capita) (Sale/Disposition/Transfer of Assets)

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**Billing Address**

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

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07/11/20 17:45:14 PROFORMA STATEMENT FOR MATTER 378224.00007 (Winkler, Geoff/Receiver for Essex Capita) (Pending Litigation)

**Preliminary Billing Form**

Billing Atty: 001842 - Del Castillo,  
Joshua

Matter #: 378224.00007

Client Name: Winkler, Geoff/Receiver for Essex Capita

Date of Last Billing: 03/31/20

Matter Name: Pending Litigation

Proforma Number: 1045150

Client/Matter Joint Group # 378224-1

**Fees for Matter 378224.00007.(Pending Litigation)**

Trans Date	Index	Description of Service Rendered	Timekeeper	Hours	Fees	Sum	Circle	Action		
01/02/20	132956	Confer with counsel re pending litigation issues, including required status reports to state court judges (0.7).	Del Castillo, Joshua	0.70	415.80	415.80	WO	HD	TR	_____
01/06/20	33028	Confer with SEC and finalize Garipalli settlement motion and prepare for filing (1.5).	Del Castillo, Joshua	1.50	891.00	1,306.80	WO	HD	TR	_____
01/07/20	124363	Review motion to approve settlement of the Garipalli action and confer with counsel regarding the same (.2); oversee filing of the same (.2).	Aspis, Norman	0.40	162.00	1,468.80	WO	HD	TR	_____
01/10/20	30623	Prepare for and participate in case management conference in Dennis v. Iannelli (.5).	Aspis, Norman	0.50	202.50	1,671.30	WO	HD	TR	_____
01/15/20	65868	Review and revise draft state court status report (0.4).	Del Castillo, Joshua	0.40	237.60	1,908.90	WO	HD	TR	_____
01/15/20	117595	Draft status report in the Gabler action (.3); confer with counsel regarding the same and prepare exhibits for filing (.2).	Aspis, Norman	0.50	202.50	2,111.40	WO	HD	TR	_____

07/11/20 17:45:14 PROFORMA STATEMENT FOR MATTER 378224.00007 (Winkler, Geoff/Receiver for Essex Capita) (Pending Litigation)

**Fees for Matter 378224.00007.(Pending Litigation)**

<b>Trans Date</b>	<b>Index</b>	<b>Description of Service Rendered</b>	<b>Timekeeper</b>	<b>Hours</b>	<b>Fees</b>	<b>Sum</b>	<b>Circle</b>	<b>Action</b>		
01/16/20	55273	Attention to pending litigation issues (0,4).	Del Castillo, Joshua	0.40	237.60	2,349.00	WO	HD	TR	_____
01/31/20	54093	Confer with counsel regarding upcoming CMC in Gabler action; draft summary email regarding the same (.5).	Aspis, Norman	0.50	202.50	2,551.50	WO	HD	TR	_____
02/03/20	7994390	Review materials provided by N. Aspis in preparation for Case Management Conference; telephonically appear for Case Management Conference; draft and send correspondence to N. Aspis regarding same.	Villagomez, Stacey	1.00	369.00	2,920.50	WO	HD	TR	_____
02/03/20	7994721	e-mails and teleconference with counsel and attention to pending litigation issues (0.7).	Del Castillo, Joshua	0.70	415.80	3,336.30	WO	HD	TR	_____
02/03/20	8024414	Confer with counsel regarding case management conference (.2).	Aspis, Norman	0.20	81.00	3,417.30	WO	HD	TR	_____
03/02/20	8025134	Emails with local counsel and opposing counsel re status of court order on Garipalli settlement and prepare outline for letter or supplemental briefing re same (1.0).	Del Castillo, Joshua	1.00	594.00	4,011.30	WO	HD	TR	_____
03/07/20	8030267	Review emails from opposing counsel and attention to pending litigation matters (1.3).	Del Castillo, Joshua	1.30	772.20	4,783.50	WO	HD	TR	_____
03/09/20	8030339	Emails with local counsel regarding status of Court approval of Garipalli settlement and provide recent filing regarding same (0.2).	Del Castillo, Joshua	0.20	118.80	4,902.30	WO	HD	TR	_____

EXHIBIT B

07/11/20 17:45:14 PROFORMA STATEMENT FOR MATTER 378224.00007 (Winkler, Geoff/Receiver for Essex Capita) (Pending Litigation)

**Fees for Matter 378224.00007.(Pending Litigation)**

Trans Date	Index	Description of Service Rendered	Timekeeper	Hours	Fees	Sum	Circle	Action		
03/31/20	8049659	Emails and teleconferences and attend to Garipalli settlement matters (1.0); review and revise status conference report for state court Dennis matter and emails regarding same (0.5).	Del Castillo, Joshua	1.50	891.00	5,793.30	WO	HD	TR	_____
03/31/20	8051223	Draft and revise status report for the Dennis matter and confer with counsel regarding the same; transmit the same for filing (.6).	Aspis, Norman	0.60	243.00	6,036.30	WO	HD	TR	_____

**Disbursements for Matter 378224.00007 (Pending Litigation)**

Trans Date	Index	Type	Quantity	Amt	Circle	Action		
01/02/20	193601	FILING – Filing Fees - - Nationwide Legal, LLC, SANTA BARBARA SUPERIOR COURTHOUSE, STATUS REPORT^203641	1.00	135.15	WO	HD	TR	_____
01/02/20	193723	MSGNR – Messenger - - Nationwide Legal, LLC, SANTA BARBARA SUPERIOR COURTHOUSE, STATUS REPORT^203641	1.00	174.00	WO	HD	TR	_____
01/15/20	83245	COURTC – Telephonic Court Appearance - - CourtCall, LLC, Santa Barbara Superior Court - Judge Donna Geck^10318303	1.00	94.00	WO	HD	TR	_____
01/15/20	183899	FILING – Filing Fees - - Nationwide Legal, LLC, SANTA BARBARA SUPERIOR COURTHOUSE, CASE MANAGEMENT STATEMENT COURTESY COPY TO DEPT. 57^204161	1.00	40.15	WO	HD	TR	_____
02/10/20	180761	COURTC – Telephonic Court Appearance - - CourtCall, LLC, Santa Barbara Superior Court - Judge Colleen K. Sterne^10376623	1.00	94.00	WO	HD	TR	_____

**Proforma Summary**

Timekeeper Number	Timekeeper	Hours	Rate	Amounts
001842	Del Castillo, Joshua	7.70	594.00	4,573.80
002336	Villagomez, Stacey	1.00	369.00	369.00
002369	Aspis, Norman	2.70	405.00	1,093.50

07/11/20 17:45:14 PROFORMA STATEMENT FOR MATTER 378224.00007 (Winkler, Geoff/Receiver for Essex Capita) (Pending Litigation)

**Proforma Summary**

**Timekeeper**

Number	Timekeeper	<u>Hours</u>	<u>Rate</u>	<u>Amounts</u>
		11.40		\$6,036.30
	Subtotal Fees			\$6,036.30
	Discount			0.00
	Total Fees			6,036.30
	Total Disbursements			537.30

**Attorney Billing Instructions**

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

**Billing Instructions**

expires 6/30/2021: 10% off standard rates (automatic)

**Account Summary – As Of 07/11/20**

	Fiscal YTD			Calendar YTD			LTD		
	Total	Fees	Disb.	Total	Fees	Disb.	Total	Fees	Disbursements
Worked	0.00	0.00	0.00	13,971.60	13,434.30	537.30	6,573.60	6,036.30	537.30
Unbilled Adj	0.00	0.00	0.00	0.00	0.00	0.00	2,439.99	2,439.99	0.00
Billed	0.00	0.00	0.00	32,241.50	31,604.76	636.74	63,386.46	63,386.46	964.14
Collected	0.00	0.00	0.00	32,241.50	31,604.76	636.74	64,350.60	63,386.46	964.14
AR Write Off	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00
<b>WIP</b>	<b>14,033.31</b>	<b>13,434.30</b>	<b>599.01</b>						
<b>Balance</b>									
<b>AR Balance</b>	<b>0.00</b>	<b>0.00</b>	<b>0.00</b>						
<b>Unalloc</b>	<b>0.00</b>								
<b>Payment</b>									
<b>Client Trust</b>	<b>0.00</b>								
<b>Balance</b>									

**Billing Address**

**EXHIBIT B**

07/11/20 17:45:14 PROFORMA STATEMENT FOR MATTER 378224.00007 (Winkler, Geoff/Receiver for Essex Capita) (Pending Litigation)

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

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07/11/20 17:45:16 PROFORMA STATEMENT FOR MATTER 378224.00008 (Winkler, Geoff/Receiver for Essex Capita) (Claims/Distribution)

**Preliminary Billing Form**

Billing Atty: 001842 - Del Castillo, Joshua  
 Date of Last Billing: 03/31/20  
 Proforma Number: 1045150  
 Client/Matter Joint Group # 378224-1

Matter #: 378224.00008

Client Name: Winkler, Geoff/Receiver for Essex Capita  
 Matter Name: Claims/Distribution

**Fees for Matter 378224.00008.(Claims/Distribution)**

Trans Date	Index	Description of Service Rendered	Timekeeper	Hours	Fees	Sum	Circle	Action		
01/02/20	135794	Several emails/meeting with counsel to assess the strategy (.2). Revise draft of the response to Perry/Wolansky motion to lift stay order (.6).	Zaro, David	0.80	630.00	630.00	WO	HD	TR	_____
01/09/20	118279	Analysis of issues related to claims issues, advice re claims motion process (.4). Conferences with counsel related to the Perry & Wolansky issues (.2).	Zaro, David	0.60	472.50	1,102.50	WO	HD	TR	_____
01/10/20	65932	Analysis of the issues related to grant claims, follow-up meeting with counsel (.7). Follow-up on issues related to claims issues, advice to Receiver counsel (.4).	Zaro, David	1.10	866.25	1,968.75	WO	HD	TR	_____
01/14/20	53217	Draft outline for establishing claims procedures (.9); and confer with counsel regarding the same (.4).	Aspis, Norman	1.30	526.50	2,495.25	WO	HD	TR	_____
01/14/20	65628	Confer with counsel and advice to counsel/Receiver related to the claims issues, claim disputes and strategy (.4).	Zaro, David	0.40	315.00	2,810.25	WO	HD	TR	_____

07/11/20 17:45:16 PROFORMA STATEMENT FOR MATTER 378224.00008 (Winkler, Geoff/Receiver for Essex Capita) (Claims/Distribution)

**Fees for Matter 378224.00008.(Claims/Distribution)**

<b>Trans Date</b>	<b>Index</b>	<b>Description of Service Rendered</b>	<b>Timekeeper</b>	<b>Hours</b>	<b>Fees</b>	<b>Sum</b>	<b>Circle</b>	<b>Action</b>		
01/16/20	55269	Review and confer re outline for motion to approve claims procedures (0.5).	Del Castillo, Joshua	0.50	297.00	3,107.25	WO	HD	TR	_____
01/17/20	52491	Analysis of the email from claimant Grant, follow-up with Receiver counsel, related to the claims process/Grant claim issues (.4).	Zaro, David	0.40	315.00	3,422.25	WO	HD	TR	_____
01/17/20	61357	Confer with counsel re anticipated motion to approve claims process (0.5).	Del Castillo, Joshua	0.50	297.00	3,719.25	WO	HD	TR	_____
01/21/20	61479	Prepare outline of motion for authority to pursue disgorgement claims (2.1); confer with counsel regarding the same (.4); draft correspondence to J. Hall regarding forthcoming filings related to claims (.3).	Aspis, Norman	2.80	1,134.00	4,853.25	WO	HD	TR	_____
01/27/20	51215	Prepare for/attend the meeting with the Receiver related to the disputed claims of Grant (.8).	Zaro, David	0.80	630.00	5,483.25	WO	HD	TR	_____
01/27/20	53029	Confer with G. Winkler, J. Hall, and counsel regarding forthcoming motions related to the claims process (.5).	Aspis, Norman	0.50	202.50	5,685.75	WO	HD	TR	_____
01/28/20	131933	Confer with counsel re proposed motion to approve claims process and review associated documents (1.5).	Del Castillo, Joshua	1.50	891.00	6,576.75	WO	HD	TR	_____
01/29/20	136925	Follow-up on the Grant, Perry, Wolansky matters, call with counsel for claimants.	Zaro, David	0.40	315.00	6,891.75	WO	HD	TR	_____
01/30/20	136926	Assess issues related to the claims of Grant and others, emails to claimant counsel (.6). Advice to counsel as to claimants, stay relief and review supplement (.4). Follow-up emails and/or call with Receiver and Napoli	Zaro, David	1.40	1,102.50	7,994.25	WO	HD	TR	_____

07/11/20 17:45:16 PROFORMA STATEMENT FOR MATTER 378224.00008 (Winkler, Geoff/Receiver for Essex Capita) (Claims/Distribution)

**Fees for Matter 378224.00008.(Claims/Distribution)**

<b>Trans Date</b>	<b>Index</b>	<b>Description of Service Rendered</b> as to Perry/Wolansky claims (.4).	<b>Timekeeper</b>	<b>Hours</b>	<b>Fees</b>	<b>Sum</b>	<b>Circle</b>	<b>Action</b>		
01/31/20	54091	Confer with counsel regarding the anticipated claims process (.2).	Aspis, Norman	0.20	81.00	8,075.25	WO	HD	TR	_____
01/31/20	132630	Work on response to the Grand demand, email response to counsel (.4). Email to Receiver and Accountant as to claim issues/accounting and RFI as to Grant items (.5). Follow-up emails concerning settlement of claims (.8).	Zaro, David	1.70	1,338.75	9,414.00	WO	HD	TR	_____
02/03/20	7994116	Research/analysis of the foundation for claims, address defenses to the claim/cross-claim (.9). Several calls/emails with Receiver and counsel re claims (.5).	Zaro, David	1.40	1,102.50	10,516.50	WO	HD	TR	_____
02/04/20	7996246	Analysis of the email counter-offer from claimant and assess response (.4). Follow-up analysis related to the Receiver counter-claims and legal factual foundation, confer with counsel, email to Receiver (1.20)	Zaro, David	1.60	1,260.00	11,776.50	WO	HD	TR	_____
02/04/20	7996529	Prepare motion to establish claims procedures and approve claim form (5.6).	Aspis, Norman	5.60	2,268.00	14,044.50	WO	HD	TR	_____
02/05/20	7996621	Analysis of the Receiver's response to the grant claims, Receiver UVTA/UFTA counter-claims (.6). Meeting with counsel and email to Receiver addressing the UVTA/UFTA, response and counter-offer (.8).	Zaro, David	1.40	1,102.50	15,147.00	WO	HD	TR	_____
02/10/20	8000516	Email and letter from claimant (.2).	Zaro, David	0.20	157.50	15,304.50	WO	HD	TR	_____



07/11/20 17:45:16 PROFORMA STATEMENT FOR MATTER 378224.00008 (Winkler, Geoff/Receiver for Essex Capita) (Claims/Distribution)

**Fees for Matter 378224.00008.(Claims/Distribution)**

<b>Trans Date</b>	<b>Index</b>	<b>Description of Service Rendered</b>	<b>Timekeeper</b>	<b>Hours</b>	<b>Fees</b>	<b>Sum</b>	<b>Circle Action</b>			
02/20/20	8009248	Analysis of affirmative and counter-claim, assess prospective discovery value as to disputed claim; and review of the voidable transfer issues (.4). Emails with Grant's counsel and the Receiver as to negotiations, settlement, and Receiver advice/strategy (.4).	Zaro, David	0.80	630.00	15,934.50	WO	HD	TR	_____
02/24/20	8011696	Call with counsel and email related to claim, follow-up as to Grant claim/settlement proposal.	Zaro, David	0.40	315.00	16,249.50	WO	HD	TR	_____
02/26/20	8013956	Analysis of offer, further work on the claims and counter-claims, including Grant claim/counter-claim, and recovery scenarios response to settlement offer (.3). Email/conferences with counsel and Receiver related to settlement of claim (.3).	Zaro, David	0.60	472.50	16,722.00	WO	HD	TR	_____
02/27/20	8015188	Conference with counsel re Grant claim, follow-up as to settlement (.2).	Zaro, David	0.20	157.50	16,879.50	WO	HD	TR	_____
03/02/20	8025500	Analysis of the claims motion and approach to disputed claims, advice to counsel (.4). Call with counsel and Receiver related to claims process/motion (.2). Call with counsel and Receiver related to the Grant claim (.2).	Zaro, David	0.80	630.00	17,509.50	WO	HD	TR	_____
03/04/20	8027446	Confer with counsel re claims and distribution issues; review draft motion re same; and prepare detailed outline for call with SEC re same (2.1).	Del Castillo, Joshua	2.10	1,247.40	18,756.90	WO	HD	TR	_____
03/04/20	8031359	Confer with counsel regarding claims procedures and potential for stipulated relief	Aspis, Norman	0.20	81.00	18,837.90	WO	HD	TR	_____

07/11/20 17:45:16 PROFORMA STATEMENT FOR MATTER 378224.00008 (Winkler, Geoff/Receiver for Essex Capita) (Claims/Distribution)

**Fees for Matter 378224.00008.(Claims/Distribution)**

<b>Trans Date</b>	<b>Index</b>	<b>Description of Service Rendered (.2).</b>	<b>Timekeeper</b>	<b>Hours</b>	<b>Fees</b>	<b>Sum</b>	<b>Circle</b>	<b>Action</b>		
03/06/20	8029268	Emails and teleconference regarding claims and distribution plans (0.8).	Del Castillo, Joshua	0.80	475.20	19,313.10	WO	HD	TR	_____
03/06/20	8030114	Confer with counsel and D. Miller regarding the Receiver's forthcoming motion/stipulation regarding the claims process and associated proposed procedures (.4).	Aspis, Norman	0.40	162.00	19,475.10	WO	HD	TR	_____
03/07/20	8030264	Attention to issues regarding contemplated stipulation on claims procedures; legal analysis of novel issue presented during meet and confer with SEC (1.5).	Del Castillo, Joshua	1.50	891.00	20,366.10	WO	HD	TR	_____
03/12/20	8034256	Confer with counsel regarding anticipated stipulation on claims process and attention to issues regarding same (1.0).	Del Castillo, Joshua	1.00	594.00	20,960.10	WO	HD	TR	_____
03/12/20	8037178	Several emails with counsel and Mr. Napoli related to the Perry/Wolansky claims issues (.3). Call with counsel and follow-up work related to this matter (.3).	Zaro, David	0.60	472.50	21,432.60	WO	HD	TR	_____
03/12/20	8038385	Draft and revise stipulation regarding claims procedures and confer with counsel regarding the same (4.2).	Aspis, Norman	4.20	1,701.00	23,133.60	WO	HD	TR	_____
03/13/20	8035107	Review and substantially revise stipulation regarding claims process; confer with counsel regarding same; analysis of issues raised by stipulation in connection with same (3.2).	Del Castillo, Joshua	3.20	1,900.80	25,034.40	WO	HD	TR	_____

07/11/20 17:45:16 PROFORMA STATEMENT FOR MATTER 378224.00008 (Winkler, Geoff/Receiver for Essex Capita) (Claims/Distribution)

**Fees for Matter 378224.00008.(Claims/Distribution)**

<b>Trans Date</b>	<b>Index</b>	<b>Description of Service Rendered</b>	<b>Timekeeper</b>	<b>Hours</b>	<b>Fees</b>	<b>Sum</b>	<b>Circle</b>	<b>Action</b>		
03/13/20	8038269	Draft and revise stipulation regarding claims procedures (.5).	Aspis, Norman	0.50	202.50	25,236.90	WO	HD	TR	_____
03/16/20	8037352	Review and revise claims stipulation; analysis of issues re same; confer re same (1.8).	Del Castillo, Joshua	1.80	1,069.20	26,306.10	WO	HD	TR	_____
03/16/20	8038210	Review and revise claims procedures stipulation and confer with counsel regarding the same (.7).	Aspis, Norman	0.70	283.50	26,589.60	WO	HD	TR	_____
03/16/20	8039614	Follow-up with counsel, advice concerning form of the stipulation for claims procedures, advice regarding proof of claims (.3).	Zaro, David	0.30	236.25	26,825.85	WO	HD	TR	_____
03/17/20	8038327	Emails with counsel and Receiver's office regarding claims procedures (0.6).	Del Castillo, Joshua	0.60	356.40	27,182.25	WO	HD	TR	_____
03/17/20	8040908	Claims motion and stipulation, then follow-up with call and email (.6).	Zaro, David	0.60	472.50	27,654.75	WO	HD	TR	_____
03/18/20	8038813	Emails with Receiver and counsel regarding claims process and updates to stipulation (0.3).	Del Castillo, Joshua	0.30	178.20	27,832.95	WO	HD	TR	_____
03/18/20	8041500	Email/call with Receiver concerning the claims motion and advice to counsel (.4).	Zaro, David	0.40	315.00	28,147.95	WO	HD	TR	_____
03/19/20	8039558	Confer with counsel, Receiver's office, and SEC regarding claims procedures issues and finalize and circulate proposed stipulation for SEC review and comment (1.2).	Del Castillo, Joshua	1.20	712.80	28,860.75	WO	HD	TR	_____

07/11/20 17:45:16 PROFORMA STATEMENT FOR MATTER 378224.00008 (Winkler, Geoff/Receiver for Essex Capita) (Claims/Distribution)

**Fees for Matter 378224.00008.(Claims/Distribution)**

Trans Date	Index	Description of Service Rendered	Timekeeper	Hours	Fees	Sum	Circle	Action		
03/19/20	8041524	Follow-up with Receiver related to the claims motion and email re claimant (.3).	Zaro, David	0.30	236.25	29,097.00	WO	HD	TR	_____
03/23/20	8046652	Draft and revise proposed order regarding claims procedures (.4).	Aspis, Norman	0.40	162.00	29,259.00	WO	HD	TR	_____
03/24/20	8045333	Review emails related to the Grant and Perry claims, follow-up concerning negotiations (.3). Call with counsel related to claims motion and address the anticipated disputed claims (.3). Call with Receiver concerning the Grant negotiations, follow-up regarding claims (.2).	Zaro, David	0.80	630.00	29,889.00	WO	HD	TR	_____
03/31/20	8051606	email/call related to Perry claim (.2). Review of the Grant claim and follow-up call with counsel for Grant/settlement terms (.4).	Zaro, David	0.60	472.50	30,361.50	WO	HD	TR	_____

**Proforma Summary**

Timekeeper Number	Timekeeper	Hours	Rate	Amounts
000313	Zaro, David	18.60	787.50	14,647.50
001842	Del Castillo, Joshua	15.00	594.00	8,910.00
002369	Aspis, Norman	16.80	405.00	6,804.00
		<u>50.40</u>		<u>\$30,361.50</u>
Subtotal Fees				\$30,361.50
Discount				0.00
Total Fees				30,361.50
Total Disbursements				0.00

**Attorney Billing Instructions**

- ( ) BILL ALL
- ( ) BILL FEES ONLY
- ( ) Hold
- ( ) Write Off

07/11/20 17:45:16 PROFORMA STATEMENT FOR MATTER 378224.00008 (Winkler, Geoff/Receiver for Essex Capita) (Claims/Distribution)

( ) BILL COST ONLY

( ) Transfer All

**Billing Instructions**

expires 6/30/2021: 10% off standard rates (automatic)

**Account Summary – As Of 07/11/20**

	Fiscal YTD			Calendar YTD			LTD		
	Total	Fees	Disb.	Total	Fees	Disb.	Total	Fees	Disbursements
Worked	0.00	0.00	0.00	38,661.30	38,661.30	0.00	30,361.50	30,361.50	0.00
Unbilled Adj	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00
Billed	0.00	0.00	0.00	10,161.00	10,161.00	0.00	15,356.25	15,356.25	0.00
Collected	0.00	0.00	0.00	10,161.00	10,161.00	0.00	15,356.25	15,356.25	0.00
AR Write Off	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00
	<b>Total</b>	<b>Fees</b>	<b>Costs</b>						
<b>WIP</b>	<b>38,661.30</b>	<b>38,661.30</b>	<b>0.00</b>						
<b>Balance</b>									
<b>AR Balance</b>	<b>0.00</b>	<b>0.00</b>	<b>0.00</b>						
<b>Unalloc</b>	<b>0.00</b>								
<b>Payment</b>									
<b>Client Trust</b>	<b>0.00</b>								
<b>Balance</b>									

**Billing Address**

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

}

07/11/20 17:45:19 PROFORMA STATEMENT FOR MATTER 378224.00009 (Winkler, Geoff/Receiver for Essex Capita) (Third Party Claims & Recoveries)

**Preliminary Billing Form**

Billing Atty: 001842 - Del Castillo,  
Joshua  
Date of Last Billing:  
Proforma Number: 1045150  
Client/Matter Joint Group # 378224-1

Matter #: 378224.00009

Client Name: Winkler, Geoff/Receiver for Essex Capita

Matter Name: Third Party Claims & Recoveries

**Fees for Matter 378224.00009.(Third Party Claims & Recoveries)**

<b>Trans Date</b>	<b>Index</b>	<b>Description of Service Rendered</b>	<b>Timekeeper</b>	<b>Hours</b>	<b>Fees</b>	<b>Sum</b>	<b>Circle</b>	<b>Action</b>		
02/06/20	7998853	Emails/calls with counsel and Receiver to address the fraudulent conveyance claims, legal/factual foundation and advice as to claims (.9).	Zaro, David	0.90	708.75	708.75	WO	HD	TR	_____
02/20/20	8009010	Analysis of affirmative and counter claim, assess prospective discovery value as to disputed claim, and review of the voidable transfer issues (.4). Emails with Grant's counsel and the Receiver as to negotiations, settlement, and Receiver advice/strategy (.4).	Zaro, David	0.80	630.00	1,338.75	WO	HD	TR	_____
02/21/20	8010230	Conferences with counsel/emails and work on the analysis/issues related to the prospective settlement with Grant, other claims (.6).	Zaro, David	0.60	472.50	1,811.25	WO	HD	TR	_____
02/26/20	8013959	Analysis of offer, further work on the claims and counter-claims, including Grant claim/counter-claim, and recovery scenarios response to settlement offer (.3). Email/conferences with counsel and	Zaro, David	0.60	472.50	2,283.75	WO	HD	TR	_____

07/11/20 17:45:19 PROFORMA STATEMENT FOR MATTER 378224.00009 (Winkler, Geoff/Receiver for Essex Capita) (Third Party Claims &amp; Recoveries)

**Fees for Matter 378224.00009.(Third Party Claims & Recoveries)**

Trans Date	Index	Description of Service Rendered	Timekeeper	Hours	Fees	Sum	Circle	Action		
		Receiver related to settlement of claim (.3).								
03/03/20	8028149	Further analysis and work on the settlement terms;negotiations, draft email response, counter offer to Grant concerning voidable transfer claims (.4). Research/analysis of voidable transfer claims issues as to net winners, motion concerning settlement process (.5).	Zaro, David	0.90	708.75	2,992.50	WO	HD	TR	_____
03/09/20	8032910	Follow-up with counsel related to Receiver's claims motion and advice related to process/disputed claims (.3).	Zaro, David	0.30	236.25	3,228.75	WO	HD	TR	_____
03/10/20	8033007	Analysis of counter-offer and address the issues related to counter-proposal from Grant, email to counsel (.6).	Zaro, David	0.60	472.50	3,701.25	WO	HD	TR	_____
03/11/20	8034414	Conference with counsel, advice as to claims motion (.3). Research/analysis of the legal issues related to disputed claims (.5). Work on the analysis regarding the Grant claim, follow-up meeting/email with counsel (.6).	Zaro, David	1.40	1,102.50	4,803.75	WO	HD	TR	_____
03/16/20	8039616	Further analysis and research related to the claims to recover profits from net winners, assess recent case law regarding fraudulent conveyance and assess accounting requirements (1.7). Follow-up with counsel, advice concerning the stipulation/motion and order(.2).	Zaro, David	1.90	1,496.25	6,300.00	WO	HD	TR	_____
03/18/20	8041506	Conference with counsel, analysis/development of facts concerning the accounting issues to support the claims	Zaro, David	0.30	236.25	6,536.25	WO	HD	TR	_____

07/11/20 17:45:19 PROFORMA STATEMENT FOR MATTER 378224.00009 (Winkler, Geoff/Receiver for Essex Capita) (Third Party Claims & Recoveries)

**Fees for Matter 378224.00009.(Third Party Claims & Recoveries)**

Trans Date	Index	Description of Service Rendered	Timekeeper	Hours	Fees	Sum	Circle	Action
03/19/20	8041520	Email/call with counsel related to the disgorgement issues (.4). Assess Receiver's accounting/tranches related to the disgorgement (.3).	Zaro, David	0.70	551.25	7,087.50	WO	HD TR
03/20/20	8043270	Further work and analysis of the issues related to the third party claims/accounting verification.	Zaro, David	0.40	315.00	7,402.50	WO	HD TR
03/25/20	8045434	Call/email concerning the motion and plan related to third party claims (.3). Call with counsel and email to Grant concerning proposed settlement (.6).	Zaro, David	0.90	708.75	8,111.25	WO	HD TR

**Proforma Summary**

Timekeeper Number	Timekeeper	Hours	Rate	Amounts
000313	Zaro, David	10.30	787.50	8,111.25
		10.30		\$8,111.25
Subtotal Fees				\$8,111.25
Discount				0.00
Total Fees				8,111.25
Total Disbursements				0.00

**Attorney Billing Instructions**

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

**Billing Instructions**

expires 6/30/2021: 10% off standard rates (automatic)



07/11/20 17:45:19 PROFORMA STATEMENT FOR MATTER 378224.00009 (Winkler, Geoff/Receiver for Essex Capita) (Third Party Claims & Recoveries)

**Account Summary – As Of 07/11/20**

	Fiscal YTD			Calendar YTD			LTD		
	Total	Fees	Disb.	Total	Fees	Disb.	Total	Fees	Disbursements
Worked	2,416.50	2,416.50	0.00	13,362.75	13,362.75	0.00	8,111.25	8,111.25	0.00
Unbilled Adj	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00
Billed	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00
Collected	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00
AR Write Off	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00
	<b>Total</b>	<b>Fees</b>	<b>Costs</b>						
<b>WIP</b>	<b>13,362.75</b>	<b>13,362.75</b>	<b>0.00</b>						
<b>Balance</b>									
<b>AR Balance</b>	<b>0.00</b>	<b>0.00</b>	<b>0.00</b>						
<b>Unalloc</b>	<b>0.00</b>								
<b>Payment</b>									
<b>Client Trust</b>	<b>0.00</b>								
<b>Balance</b>									

**Billing Address**

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



**David R. Zaro**  
PARTNER | LOS ANGELES

T (213) 955-5518  
E dzaro@allenmatkins.com

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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E [jdcastillo@allenmatkins.com](mailto:jdcastillo@allenmatkins.com)

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 **September 18, 2020**, I caused to be served on all the parties to this action addressed as stated on the attached service list the document entitled: **FIFTH INTERIM APPLICATION OF RECEIVER, GEOFF WINKLER, AND ALLEN MATKINS LECK GAMBLE MALLORY & NATSIS LLP, GENERAL COUNSEL TO THE RECEIVER, FOR PAYMENT OF FEES AND REIMBURSEMENT OF EXPENSES**

**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 **August 12, 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 LLPP  
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