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8 GEOFF WINKLER

9 UNITED STATES DISTRICT COURT  
10 CENTRAL DISTRICT OF CALIFORNIA  
11 WESTERN DIVISION

12 SECURITIES AND EXCHANGE  
COMMISSION,

13 Plaintiff,

14 v.

15 RALPH T. IANNELLI and ESSEX  
16 CAPITAL CORP.,

17 Defendants.

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

**ELEVENTH INTERIM  
APPLICATION OF RECEIVER,  
GEOFF WINKLER, AND HIS  
GENERAL COUNSEL, ALLEN  
MATKINS LECK GAMBLE  
MALLORY & NATSIS LLP, FOR  
PAYMENT OF FEES AND  
REIMBURSEMENT OF EXPENSES**

Date: April 28, 2022  
Time: 10:00 a.m.  
Ctrm: 6D  
Judge: Hon. Fernando M. Olguin

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1 Geoff Winkler (the "Receiver"), the Court-appointed permanent receiver for  
 2 defendant Essex Capital Corporation and its subsidiaries and affiliates (collectively,  
 3 the "Receivership Entities" or "Entities"), and his counsel of record, Allen Matkins  
 4 Leck Gamble Mallory & Natsis LLP ("Allen Matkins," and together, with the  
 5 Receiver, the "Applicants"), hereby jointly submit this Eleventh Interim Application  
 6 for the Payment of Fees and the Reimbursement of expenses (the "Fee  
 7 Application").

8 **I. INTRODUCTION.**

9 This Fee Application is the eleventh interim fee application submitted in the  
 10 above-referenced matter and covers the Applicants' fees and expenses incurred  
 11 during the period from October 1, 2021, through December 31, 2021 (the  
 12 "Application Period").

13 By way of this Fee Application, the Applicants request the Court's approval of  
 14 100% of their fees and expenses incurred during the Application Period and further  
 15 request the interim payment of 80% of such fees and 100% of such expenses, to be  
 16 paid from the funds of the receivership estate of the Receivership Entities (the  
 17 "Receivership Estate" or "Estate"). Specifically, the amounts of the Applicants' fees  
 18 and expenses sought to be approved and paid under this Fee Application are as  
 19 follows:

| Applicant     | Fees                | Interim Payment of Fees | Expenses           | Interim Payment of Expenses |
|---------------|---------------------|-------------------------|--------------------|-----------------------------|
| Receiver      | \$93,801.00         | \$75,040.80             | \$2,150.43         | \$2,150.43                  |
| Allen Matkins | \$402,426.45        | \$321,941.16            | \$26,588.10        | \$26,588.10                 |
|               | <b>\$496,227.45</b> | <b>\$396,981.96</b>     | <b>\$28,738.53</b> | <b>\$28,738.53</b>          |

25  
 26 Consistent with the billing guidelines of plaintiff the Securities and Exchange  
 27 Commission (the "SEC") and the Applicants' commitments for this federal  
 28 receivership, the remaining, unpaid 20% "holdback" of the Applicants' approved

1 fees will be subject to final review and payment at the conclusion of this  
2 receivership.

3 **II. GENERAL SUMMARY.**

4 During the Application Period, and with assistance from Allen Matkins, the  
5 Receiver made substantial progress in the satisfaction of his duties and the  
6 objectives outlined by this Court in its *Order Regarding Preliminary Injunction and*  
7 *Appointment of a Permanent Receiver* (the "Appointment Order") entered on  
8 December 21, 2018, ECF No. 66, its *Order in Aid of Receivership* (the "Order in  
9 Aid") entered on February 1, 2019, ECF No. 69, and its *Order Regarding*  
10 *Permanent Injunction* (the "Permanent Injunction Order") entered on  
11 September 9, 2019, ECF No. 113. Among other things, the Receiver (a) executed  
12 on his plan for processing investor and creditor claims and developed a final  
13 recommendation regarding the treatment of all known claims, and (b) continued to  
14 execute his plan for recovering and maximizing the assets of the Receivership Estate  
15 (the "Receivership Assets" or "Assets"), including via the evaluation and  
16 prosecution of claims against third parties believed to be in wrongful possession of  
17 any Receivership Assets, with a focus on his pursuit of disgorgement actions against  
18 profiting investors.

19 Given the amount and significance of the work completed by the Applicants  
20 during the Application Period, they respectfully submit that the fees and expenses  
21 incurred during that period are reasonable and appropriate and should be approved  
22 and paid, on an interim basis, in the amounts indicated above. As an  
23 accommodation to the Estate, and consistent with the SEC's billing guidelines and  
24 the ordinary practice in federal receiverships, the Applicants request that the Court  
25 approve 100% of their fees and expenses incurred during the Application Period but  
26 authorize payment, on an interim basis, of only 80% of such fees and 100% of such  
27 expenses at this time.

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1 **III. THE RECEIVER'S FEES AND EXPENSES.**

2 **A. Appointment of the Receiver.**

3 On December 21, 2018, by the Appointment Order, the Court appointed the  
4 Receiver as the permanent receiver for the Receivership Entities.

5 **B. Services Rendered During the Application Period.**

6 During the Application Period, the Receiver and his staff undertook additional  
7 efforts to review the business and financial activities of the Receivership Entities;  
8 investigate and recover Receivership Assets, including via attending to pending  
9 litigation to recover Receivership Assets; identify prospective claims against third  
10 parties; administer the claims process by which investors in and creditors of the  
11 Entities submitted claims against the Estate; and otherwise administer the Estate.

12 Overall, on account of their services rendered on behalf of the Receivership  
13 Estate during the Application Period, the Receiver and his staff billed 362.6 hours  
14 and \$93,801.00 in fees across the following six categories:

| Category                            | Hours        | Fees               |
|-------------------------------------|--------------|--------------------|
| Financial - Accounting/Auditing     | 8.3          | \$2,317.50         |
| Financial - Forensic Accounting     | 41.3         | \$10,286.10        |
| Financial - Tax Issues              | 17.9         | \$4,875.30         |
| Legal - Asset Analysis and Recovery | 120.8        | \$31,018.80        |
| Legal - Case Administration         | 136.7        | \$34,870.50        |
| Legal - Claims Administration       | 37.6         | \$10,432.80        |
|                                     | <b>362.6</b> | <b>\$93,801.00</b> |

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23 Provided below are narrative summaries of the work performed under each of the  
24 categories, and attached hereto as **Exhibit 1** are the Receiver's invoices, containing  
25 the billing entries detailing the tasks performed by the Receiver and his staff during  
26 the Application Period.

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1                   **1.     Financial – Accounting/Auditing.**

2                   In connection with the "Financial – Accounting/Auditing" category, the  
3 Receiver and his staff billed 8.3 hours and \$2,317.50 in fees during the Application  
4 Period.

5                   The services in this category generally relate to the Receiver's review,  
6 analysis, and audit of the Receivership Entities' accounting. During the Application  
7 Period, the limited work performed by the Receiver and his staff for this category  
8 including preparing the standardized fund accounting report for this period and  
9 working on tax-return-related matters.

10                   **2.     Financial – Forensic Accounting.**

11                   In connection with the "Financial – Forensic Accounting" category, the  
12 Receiver and his staff billed 41.3 hours and \$10,286.10 in fees during the  
13 Application Period.

14                   The services in this category generally pertain to the Receiver's forensic  
15 accounting of the Receivership Entities' finances. The work by the Receiver and his  
16 staff for this category during the Application Period substantially revolved around  
17 the Receiver's review and analysis of financial documents provided by 915 Elm  
18 Avenue CVL, LLC ("CVL") in connection with the Receiver's efforts to settle the  
19 action captioned as *Winkler v. 915 Elm Avenue CVL, LLC* and bearing Case  
20 No. 2:21-cv-00869-FMO-AFM (the "CVL Action"), which he reviewed as part of  
21 the parties' settlement negotiations.

22                   **3.     Financial – Tax Issues.**

23                   In connection with the "Financial – Tax Issues" category, the Receiver and his  
24 staff billed 17.9 hours and \$4,875.30 in fees during the Application Period.

25                   The services in this category generally relate to the Receiver's work  
26 addressing tax-related issues and obligations facing the Receivership Estate. During  
27 the Application Period, for this category, the Receiver and his staff expended time  
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1 working with the Estate's tax accountant on getting it the necessary reports,  
2 documents, and information for preparing the Estate's tax returns.

3 **4. Legal – Asset Analysis and Recovery.**

4 In connection with the "Legal – Asset Analysis and Recovery" category, the  
5 Receiver and his staff billed 120.8 hours and \$31,018.80 in fees during the  
6 Application Period.

7 The services in this category broadly relate to the Receiver's efforts to  
8 identify, secure, preserve, and recover any Receivership Assets, including any  
9 claims against third parties. During the Application Period, the Receiver and his  
10 staff devoted a significant amount of time performing tasks relating to the CVL  
11 Action and the pending disgorgement actions against profiting investors. More  
12 specifically, in connection with the CVL Action, the Receiver had to prepare and sit  
13 for an extended deposition, and similarly had to prepare for and attend a later, all-  
14 day mediation. Thereafter, his office also performed additional tasks to standardize  
15 and analyze the financial documents provided by CVL.

16 With respect to the pending disgorgement actions, the Receiver and his staff  
17 worked closely with counsel regarding the evidence establishing the existence of the  
18 Ponzi scheme (discussed further below), including by compiling and providing the  
19 financial information needed for counsel to complete their analysis, and to produce  
20 related documents in discovery. They also continued settlement administration with  
21 respect to those profiting investors who agreed to settle the Receiver's prospective  
22 disgorgement claims against them prior to the commencement of formal litigation.

23 Finally, for this category, the Receiver and his staff also evaluated certain  
24 potential third-party recovery targets and assets, which the Receiver is still  
25 considering pursuing for the benefit of the Estate.

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1                                   **5.     Legal – Case Administration.**

2             In connection with the "Legal – Case Administration" category, the Receiver  
3 and his staff billed 136.7 hours and \$34,870.50 in fees during the Application  
4 Period.

5             The services in this category generally concern the Receiver's general  
6 administration of the Receivership Estate, along with his handling of other necessary  
7 administrative matters. During the Application Period, the Receiver and his staff  
8 communicated extensively with Allen Matkins regarding the administration of the  
9 Receivership Entities and the Estate, along with the legal work required to enable  
10 him to undertake those efforts he deemed necessary, with particular attention to  
11 efforts regarding the marshalling and recovery of Receivership Assets and his  
12 administration of the claims against the Estate pursuant to the Court-approved  
13 claims procedures. For this category, the Receiver and his staff also expended time  
14 on other administrative matters, including updating the website for this receivership  
15 and responding to inquiries from claimants and investors, usually regarding updates  
16 as to the status of the receivership and the claims and distribution process.

17                                   **6.     Legal – Claims Administration.**

18             In connection with the "Legal – Claims Administration" category, the  
19 Receiver and his staff billed 37.6 hours and \$10,432.80 in fees during the  
20 Application Period.

21             The services in this category generally relate to the claims and distribution  
22 process, including the Receiver's efforts to identify, analyze, and resolve the  
23 investor and creditor claims against the Estate and his eventual efforts to make  
24 distributions to holders of allowed claims against the Estate. During the Application  
25 Period, having completed his review of the claims submitted in accordance with the  
26 Court-approved claims procedures, the Receiver finalized a claims register and his  
27 proposed plan for distribution on allowed claims. The Receiver then worked with  
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1 Allen Matkins on his motion to approve the Receiver's proposed distribution plan  
2 and recommended treatment of claims, which was filed on December 21, 2021.

3 **C. Expenses Incurred During the Application Period.**

4 In connection with his services rendered on behalf of the Receivership Estate  
5 during the Application Period, the Receiver incurred \$2,150.43 in expenses. The  
6 Receiver's invoices, attached hereto as **Exhibit 1**, detail each of the Receiver's  
7 expenses.

8 **IV. ALLEN MATKINS' FEES AND EXPENSES.**

9 **A. The Receiver's Retention of Allen Matkins.**

10 Allen Matkins was retained by the Receiver on January 2, 2019, and by the  
11 Order in Aid, the Court approved the firm's retention as lead receivership counsel  
12 for the Receiver on February 1, 2019. The Receiver selected Allen Matkins as his  
13 counsel due to the firm's extensive expertise in federal equity receivership matters,  
14 as well as in creditors' rights and litigation matters. Allen Matkins has served as  
15 counsel to federal equity receivers in dozens of cases, has represented a variety of  
16 constituents in numerous bankruptcy matters, and has significant substantive  
17 experience in related areas, such as securities, corporate, and real estate.

18 **B. Services Rendered During the Application Period.**

19 During the Application Period, Allen Matkins extensively assisted the  
20 Receiver in the performance of his receivership duties, primarily by handling  
21 litigation-related matters in connection with the Receiver's efforts to recover  
22 Receivership Assets via the actions brought against third parties.

23 Overall, on account of its services rendered to the Receiver during the  
24 Application Period, Allen Matkins billed 654.2 hours and \$402,426.45 in fees across  
25 the following fifteen categories:

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| Category                    | Hours        | Fees                |
|-----------------------------|--------------|---------------------|
| General Receivership        | 19.9         | \$12,277.80         |
| Asset Recovery & Management | 129.5        | \$79,242.30         |
| Investigation/Reporting     | 36.5         | \$18,376.20         |
| Pending Litigation          | 3.7          | \$2,380.95          |
| Claims/Distribution         | 40.4         | \$29,499.75         |
| CVL Litigation              | 314.9        | \$195,034.50        |
| Fazio Litigation            | 37.8         | \$19,724.85         |
| Siemens Litigation          | 1.9          | \$1,084.95          |
| Fead Litigation             | 8.5          | \$4,606.20          |
| Largura Litigation          | 3.3          | \$1,885.95          |
| Hopen Litigation            | 8.8          | \$5,249.70          |
| Nicholson Litigation        | 1.6          | \$1,339.20          |
| Reyner Litigation           | 9.5          | \$6,786.90          |
| Emmons Litigation           | 1.7          | \$1,422.90          |
| McCloskey Litigation        | 36.2         | \$23,514.30         |
|                             | <b>654.2</b> | <b>\$402,426.45</b> |

Provided below are narrative summaries of the work performed under each of the categories, and attached hereto as **Exhibit 2** are Allen Matkins' invoices, containing the billing entries detailing the tasks performed by the firm's attorneys and paralegals during the Application Period. In addition, biographical information of the Allen Matkins attorneys who rendered significant services during the Application Period is attached hereto as **Exhibit 3**.

Allen Matkins endeavored to staff each task efficiently, using a core team of attorneys, with specialized assistance as necessary. As the Court may recall, Allen Matkins also agreed to discount its ordinary billing rates by 10% for the duration of this matter, as well as not to charge the Estate for any travel time.

**1. General Receivership.**

In connection with the "General Receivership" category, Allen Matkins personnel billed the following time and fees during the Application Period:

///

| Timekeeper          | Position  | Hourly Rate | Hours       | Fees               |
|---------------------|-----------|-------------|-------------|--------------------|
| Joshua del Castillo | Partner   | \$643.50    | 17.6        | \$11,325.60        |
| Matthew Pham        | Associate | \$414.00    | 2.3         | \$952.20           |
|                     |           |             | <b>19.9</b> | <b>\$12,277.80</b> |

The services in this category generally relate to Allen Matkins assisting the Receiver in the general administration of the Receivership Estate. During the Application Period, Allen Matkins handled a range of case administration matters, including conferring and coordinating with the Receiver and his office on outstanding issues, tasks, and deadlines. This category also encompasses Allen Matkins rendering such other services that do not fall squarely within any other category.

**2. Asset Recovery & Management.**

In connection with the "Asset Recovery & Management" category, Allen Matkins personnel billed the following time and fees during the Application Period:

| Timekeeper          | Position  | Hourly Rate | Hours        | Fees               |
|---------------------|-----------|-------------|--------------|--------------------|
| David Zaro          | Partner   | \$837.00    | 21.3         | \$17,828.10        |
| Joshua del Castillo | Partner   | \$643.50    | 74.3         | \$47,812.05        |
| Matthew Pham        | Associate | \$414.00    | 30.1         | \$12,461.40        |
| Mikayla O'Neal      | Associate | \$315.00    | 3.3          | \$1,039.50         |
| Rachel Rosenblum    | Law Clerk | \$202.50    | 0.5          | \$101.25           |
|                     |           |             | <b>129.5</b> | <b>\$79,242.30</b> |

The services in this category concern Allen Matkins' work supporting the Receiver's efforts to identify, secure, preserve, and recover any Receivership Assets. During the Application Period, for this category, Allen Matkins devoted a considerable amount of time on tasks that commonly benefit all of the Receiver's pending disgorgement actions against profiting investors. For example, given that the parties have moved, or will soon move, beyond the pleadings stage in those actions, Allen Matkins coordinated how discovery would be handled across the

1 disgorgement actions and developed nearly universal sets of written discovery  
2 (including requests for production, requests for admission, and interrogatories) that  
3 can be easily adapted to be used in each of the actions. Allen Matkins also began its  
4 initial preparation of template motion for summary judgment/summary adjudication  
5 materials, intended to be adapted for each disgorgement action. Additionally, as the  
6 Receiver intends to establish the actual fraudulent intent element necessary to  
7 prevail on some of his disgorgement claims through the "Ponzi scheme  
8 presumption" (and he is also aware that certain defendants therein are planning to  
9 argue that there was no Ponzi scheme at the time of the transfers at issue), Allen  
10 Matkins also dedicated considerable time during the Application Period to  
11 developing a comprehensive roadmap for how the Receiver's evidence and analysis  
12 conclusively establish the existence of the Ponzi scheme, including in connection  
13 with each of the pending actions, including preparing an extensive, detailed legal  
14 memorandum for the Receiver on the issue.

15 In addition, during the Application Period, Allen Matkins' work in this  
16 category also included preparing a prospective complaint against William S. Reyner,  
17 Jr. ("Reyner") for fraud and breach of fiduciary duty (which was ultimately filed on  
18 February 4, 2022). Allen Matkins began working on the new complaint following  
19 discovery in the CVL Action, as a result of which the Receiver concluded, among  
20 other things, that Reyner had taken certain unlawful actions as manager of CVL and  
21 made certain false statements to the detriment of the Estate (who holds a  
22 membership interest in CVL and holds a promissory note from CVL).

23 Outside of formal litigation brought by the Receiver, during the Application  
24 Period, Allen Matkins also assisted the Receiver in settling another prospective  
25 clawback claim with a profiting investor, with the Estate's \$50,000 recovery from  
26 that investor bringing its total recovery through settlements to more than  
27 \$2.3 million. As the Receiver continues to hold settlement discussions with the  
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1 remaining targets of clawback claims (including those who are currently subject to a  
2 pending disgorgement action), additional recoveries for the Estate are anticipated.

3 **3. Investigation/Reporting.**

4 In connection with the "Investigation/Reporting" category, Allen Matkins  
5 personnel billed the following time and fees during the Application Period:

| Timekeeper          | Position  | Hourly Rate | Hours       | Fees               |
|---------------------|-----------|-------------|-------------|--------------------|
| David Zaro          | Partner   | \$837.00    | 0.4         | \$334.80           |
| Joshua del Castillo | Partner   | \$643.50    | 16.9        | \$10,875.15        |
| Matthew Pham        | Associate | \$414.00    | 15.5        | \$6,417.00         |
| Rachel Rosenblum    | Law Clerk | \$202.50    | 3.7         | \$749.25           |
|                     |           |             | <b>36.5</b> | <b>\$18,376.20</b> |

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12 The services in this category generally relate to Allen Matkins assisting the  
13 Receiver in his efforts to investigate the nature, location, and recovery of  
14 Receivership Assets, along with addressing inquiries relating to the business and  
15 financial activities of the Receivership Entities. This category also encompasses  
16 Allen Matkins' work relating to the Receiver's reporting obligations. During the  
17 Application Period, Allen Matkins primarily expended time for this category in  
18 preparing the Receiver's ninth interim report to this Court. Certain Allen Matkins  
19 billing entries in this category relate to work that also informed its memorandum on  
20 proving up the Ponzi scheme presumption and relating to discovery in the  
21 disgorgement actions, given certain topical overlap. No duplicate time was billed.

22 **4. Pending Litigation.**

23 In connection with the "Pending Litigation" category, Allen Matkins  
24 personnel billed the following time and fees during the Application Period:

| Timekeeper          | Position | Hourly Rate | Hours      | Fees              |
|---------------------|----------|-------------|------------|-------------------|
| Joshua del Castillo | Partner  | \$643.50    | 3.7        | \$2,380.95        |
|                     |          |             | <b>3.7</b> | <b>\$2,380.95</b> |

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1 The services in this category relate to Allen Matkins management of any pre-  
2 receivership actions pending against the Receivership Entities and include such  
3 general tasks as preparing materials for and attending hearings and status  
4 conferences in connection with those actions, preparing materials to advise the  
5 applicable courts of the litigation stay included in the Court's Appointment Order  
6 and Permanent Injunction Order, and reviewing the dockets for those actions for any  
7 new developments. During the Application Period, Allen Matkins' work in this  
8 category was limited to its continued monitoring of two matters pending before the  
9 Superior Court of California, County of Santa Barbara: (a) the action captioned as  
10 *Gabler v. Essex Capital Corp., et al.* and bearing Case No. 18CV03423 (which has  
11 now been voluntarily dismissed by the plaintiff, with prejudice) and (b) the action  
12 captioned as *Dennis v. Iannelli, et al.* and bearing Case No. 18CV03317. In both of  
13 those actions, Allen Matkins had informed the presiding judges about the existing  
14 litigation stay in order to protect and preserve the Estate from diminution.

15 **5. Claims/Distribution.**

16 In connection with the "Claims/Distribution" category, Allen Matkins  
17 personnel billed the following time and fees during the Application Period:

| Timekeeper          | Position | Hourly Rate | Hours       | Fees               |
|---------------------|----------|-------------|-------------|--------------------|
| David Zaro          | Partner  | \$837.00    | 18.1        | \$15,149.70        |
| Joshua del Castillo | Partner  | \$643.50    | 22.3        | \$14,350.05        |
|                     |          |             | <b>40.4</b> | <b>\$29,499.75</b> |

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22 The services in this category generally consist of any work by Allen Matkins  
23 relating to the receivership's claims and distribution process, including assisting the  
24 Receiver's efforts to identify and analyze claims and to eventually make  
25 distributions to claimants. During the Application Period, Allen Matkins worked  
26 closely with the Receiver on finalizing the priority scheme and structure of a  
27 proposed plan for distribution, which was followed by Allen Matkins preparing the  
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1 motion to approve the Receiver's proposed distribution plan and recommended  
 2 treatment of claims, which was filed on December 21, 2021, and has been taken  
 3 under submission by this Court. As part of preparing that motion, Allen Matkins  
 4 also spent time addressing and evaluating the expected claim dispute from an  
 5 investor claimant.

6 **6. CVL Litigation.**

7 In connection with the "CVL Litigation" category, Allen Matkins personnel  
 8 billed the following time and fees during the Application Period:

| Timekeeper          | Position  | Hourly Rate | Hours        | Fees                |
|---------------------|-----------|-------------|--------------|---------------------|
| David Zaro          | Partner   | \$837.00    | 12.3         | \$10,295.10         |
| Kevin Lloyd         | Partner   | \$670.50    | 161.9        | \$108,553.95        |
| Joshua del Castillo | Partner   | \$643.50    | 87.6         | \$56,370.60         |
| Norman Aspis        | Associate | \$445.50    | 14.6         | \$6,504.30          |
| Matthew Pham        | Associate | \$414.00    | 25.7         | \$10,639.80         |
| Ross Neglia         | Paralegal | \$315.00    | 0.7          | \$220.50            |
| Rachel Rosenblum    | Law Clerk | \$202.50    | 12.1         | \$2,450.25          |
|                     |           |             | <b>314.9</b> | <b>\$195,034.50</b> |

17 The services in this category are associated with the litigation in the CVL  
 18 Action before this Court. During the Application Period, Allen Matkins continued  
 19 to represent the Receiver in prosecuting his claims against CVL in the CVL Action,  
 20 performing various demanding tasks in connection with the litigation, primarily  
 21 relating to discovery and settlement.

22 With respect to discovery-related matters, Allen Matkins devoted  
 23 considerable time in preparing for and then taking or defending five depositions  
 24 (including preparing the Receiver for and then defending him in his deposition),  
 25 reviewing the document productions from CVL and nonparties in connection with  
 26 that deposition preparation, and drafting requests for admission propounded on  
 27 CVL. Separate from the CVL Action, Allen Matkins also prepared a demand letter  
 28 on behalf of the Receiver, as the holder of a membership interest in CVL, requesting



1 that CVL make its premises available to the Receiver for inspection and to also  
2 produce CVL's tax returns to him.

3 With respect to settlement-related matters, Allen Matkins accompanied the  
4 Receiver in a one-day mediation before the Honorable Suzanne H. Segal (ret.).  
5 Ahead of that mediation, Allen Matkins prepared an extensive confidential  
6 mediation statement for former Magistrate Judge Segal. Though the mediation did  
7 not result in an immediate settlement, Allen Matkins continued working on two  
8 alternative tracks in the CVL Action: (a) Allen Matkins, on behalf of the Receiver,  
9 continued the settlement discussions, which continued to be facilitated by  
10 Magistrate Judge Segal; and (b) in preparation for a no-settlement scenario, Allen  
11 Matkins also continued preparations for the new complaint against Reyner, in his  
12 individual capacity, including by reviewing Reyner's deposition transcript, CVL's  
13 written discovery responses, and its document production, portions of which were  
14 specifically incorporated into the complaint.

15 To date, Allen Matkins has incurred more fees than initially anticipated in  
16 connection with the CVL Action, in significant part due to the aggressive litigation  
17 tactics employed by CVL, an unusually protracted and complicated discovery effort,  
18 and CVL's apparent reluctance to acknowledge critical facts revealed through  
19 discovery.

20 **7. Fazio Litigation.**

21 In connection with the "Fazio Litigation" category, Allen Matkins personnel  
22 billed the following time and fees during the Application Period:

| Timekeeper          | Position  | Hourly Rate | Hours       | Fees               |
|---------------------|-----------|-------------|-------------|--------------------|
| David Zaro          | Partner   | \$837.00    | 0.4         | \$334.80           |
| Joshua del Castillo | Partner   | \$643.50    | 23.6        | \$15,186.60        |
| Matthew Pham        | Associate | \$414.00    | 4.8         | \$1,987.20         |
| Ross Neglia         | Paralegal | \$315.00    | 3.5         | \$1,102.50         |
| Rachel Rosenblum    | Law Clerk | \$202.50    | 5.5         | \$1,113.75         |
|                     |           |             | <b>37.8</b> | <b>\$19,724.85</b> |

1 The services in this category are associated with the litigation in the  
2 Receiver's disgorgement action against alleged profiting investors Joseph Fazio,  
3 Maria Fazio, and the Fazio Family Trust before this Court, captioned as *Winkler v.*  
4 *Fazio, et al.* and bearing Case No. 2:21-cv-02987-FMO-AFM (the "Fazio Action").  
5 During the Application Period, Allen Matkins' work in connection with the Fazio  
6 Action primarily related to discovery, including preparing the Receiver's written  
7 responses to the defendants' extensive discovery requests, reviewing documents to  
8 be produced as part of the Receiver's supplemental document production, drafting  
9 three sets of written discovery (including requests for production, requests for  
10 admission, and interrogatories) that would be subsequently served on each of the  
11 three defendants, drafting a detailed response to a so-called meet-and-confer letter  
12 issued by the defendants after the Receiver initial discovery responses and document  
13 production were served, and drafting amended written responses following the  
14 meet-and-confer conference between counsel.

15 **8. Siemens Litigation.**

16 In connection with the "Siemens Litigation" category, Allen Matkins  
17 personnel billed the following time and fees during the Application Period:

| Timekeeper          | Position  | Hourly Rate | Hours      | Fees              |
|---------------------|-----------|-------------|------------|-------------------|
| Joshua del Castillo | Partner   | \$643.50    | 1.3        | \$836.55          |
| Matthew Pham        | Associate | \$414.00    | 0.6        | \$248.40          |
|                     |           |             | <b>1.9</b> | <b>\$1,084.95</b> |

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23 The services in this category are associated with the litigation in the  
24 Receiver's disgorgement action against alleged profiting investors Wayne Siemens,  
25 Sharol Siemens, and W.G.S. Investments, Inc. before this Court, captioned as  
26 *Winkler v. Siemens, et al.* and bearing Case No. 2:21-cv-04515-FMO-AFM (the  
27 "Siemens Action"). During the Application Period, Allen Matkins' limited work in  
28 connection with the Siemens Action primarily consisted of preparing three separate

1 sets of written discovery (each set containing requests for production, requests for  
 2 admission, and interrogatories) that would be subsequently served on each of the  
 3 three defendant and reviewing documents provided by the Receiver's office in  
 4 preparation for discovery and a prospective motion for summary adjudication.

5 **9. Fead Litigation.**

6 In connection with the "Fead Litigation" category, Allen Matkins personnel  
 7 billed the following time and fees during the Application Period:

| Timekeeper          | Position  | Hourly Rate | Hours      | Fees              |
|---------------------|-----------|-------------|------------|-------------------|
| David Zaro          | Partner   | \$837.00    | 0.4        | \$334.80          |
| Joshua del Castillo | Partner   | \$643.50    | 4.0        | \$2,574.00        |
| Matthew Pham        | Associate | \$414.00    | 4.1        | \$1,697.40        |
|                     |           |             | <b>8.5</b> | <b>\$4,606.20</b> |

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 13 The services in this category are associated with the litigation in the  
 14 Receiver's disgorgement action against alleged profiting investor Beverlye Hyman  
 15 Fead before this Court, captioned as *Winkler v. Fead* and bearing Case No. 2:21-cv-  
 16 04519-FMO-AFM (the "Fead Action"). During the Application Period, Allen  
 17 Matkins' limited work in connection with the Fead Action primarily consisted of  
 18 preparing written discovery (including requests for production, requests for  
 19 admission, and interrogatories) that would be subsequently served on the defendant  
 20 and reviewing documents provided by the Receiver's office in preparation for  
 21 discovery and a prospective motion for summary adjudication.

22 **10. Largura Litigation.**

23 In connection with the "Largura Litigation" category, Allen Matkins  
 24 personnel billed the following time and fees during the Application Period:

| Timekeeper          | Position  | Hourly Rate | Hours      | Fees              |
|---------------------|-----------|-------------|------------|-------------------|
| Joshua del Castillo | Partner   | \$643.50    | 2.1        | \$1,351.35        |
| Norman Aspis        | Associate | \$445.50    | 1.2        | \$534.60          |
|                     |           |             | <b>3.3</b> | <b>\$1,885.95</b> |

1 The services in this category are associated with the litigation in the  
2 Receiver's disgorgement action against alleged profiting investor Robert Largura  
3 before this Court, captioned as *Winkler v. Largura* and bearing Case No. 2:21-cv-  
4 04534-FMO-AFM (the "Largura Action"). During the Application Period, Allen  
5 Matkins' limited work in connection with the Largura Action primarily consisted of  
6 handling typical administrative litigation matters, including meeting and conferring  
7 with opposing counsel regarding a discovery plan and other issues, preparing the  
8 parties' joint Rule 26(f) report, and reviewing documents provided by the Receiver's  
9 office in preparation for discovery and a prospective motion for summary  
10 adjudication.

11 **11. Hopen Litigation.**

12 In connection with the "Hopen Litigation" category, Allen Matkins personnel  
13 billed the following time and fees during the Application Period:

| Timekeeper          | Position  | Hourly Rate | Hours      | Fees              |
|---------------------|-----------|-------------|------------|-------------------|
| Joshua del Castillo | Partner   | \$643.50    | 7.0        | \$4,504.50        |
| Matthew Pham        | Associate | \$414.00    | 1.8        | \$745.20          |
|                     |           |             | <b>8.8</b> | <b>\$5,249.70</b> |

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19 The services in this category are associated with the litigation in the  
20 Receiver's disgorgement action against alleged profiting investor Hope Life Science  
21 Ventures, a/k/a Hopen Life Sciences, LLC, a/k/a Hopen Therapeutics, LLC before  
22 this Court, captioned as *Winkler v. Hopen Life Science Ventures* and bearing Case  
23 No. 2:21-cv-06049-FMO-AFM (the "Hopen Action"). During the Application  
24 Period, Allen Matkins' limited work in connection with the Hopen Action consisted  
25 of preparing a substantive response to various legal arguments raised by opposing  
26 counsel in a demand letter (in an effort to narrow the relevant issues between the  
27 parties), conferring with counsel regarding such arguments and case administration  
28

1 matters, and preparing a stipulation providing the defendant with an extension of the  
 2 time to respond to the Receiver's complaint (which was approved by the Court).

3 **12. Nicholson Litigation.**

4 In connection with the "Nicholson Litigation" category, Allen Matkins  
 5 personnel billed the following time and fees during the Application Period:

| Timekeeper | Position | Hourly Rate | Hours      | Fees              |
|------------|----------|-------------|------------|-------------------|
| David Zaro | Partner  | \$837.00    | 1.6        | \$1,339.20        |
|            |          |             | <b>1.6</b> | <b>\$1,339.20</b> |

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 10 The services in this category are associated with the litigation in the  
 11 Receiver's disgorgement action against alleged profiting investor William Nicholson  
 12 before this Court, captioned as *Winkler v. Nicholson* and bearing Case No. 2:21-cv-  
 13 07458-FMO-AFM (the "Nicholson Action"). During the Application Period, Allen  
 14 Matkins' limited work in connection with the Nicholson Action primarily consisted  
 15 of preparing the first amended complaint (which was amended, in part, to address  
 16 jurisdiction- and venue-related issues raised by opposing counsel) and conferring  
 17 with opposing counsel regarding settlement.

18 **13. Reyner Litigation.**

19 In connection with the "Reyner Litigation" category, Allen Matkins personnel  
 20 billed the following time and fees during the Application Period:

| Timekeeper          | Position  | Hourly Rate | Hours      | Fees              |
|---------------------|-----------|-------------|------------|-------------------|
| David Zaro          | Partner   | \$837.00    | 6.9        | \$5,775.30        |
| Joshua del Castillo | Partner   | \$643.50    | 1.1        | \$707.85          |
| Rachel Rosenblum    | Law Clerk | \$202.50    | 1.5        | \$303.75          |
|                     |           |             | <b>9.5</b> | <b>\$6,786.90</b> |

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 26 The services in this category are associated with the litigation in the  
 27 Receiver's disgorgement action against alleged profiting investors William S.  
 28 Reyner, Jr., the William S. Reyner, Jr. Trust, Susan Reyner, the Susan Reyner

1 Living Trust, and Reyner Family Partners, L.P. before this Court, captioned as  
 2 *Winkler v. Reyner, et al.* and bearing Case No. 2:21-cv-05730-FMO-AFM (the  
 3 "Reyner Action"). During the Application Period, Allen Matkins' limited work in  
 4 connection with the Reyner Action primarily consisted of handling typical  
 5 administrative litigation matters, including meeting and conferring with opposing  
 6 counsel regarding a discovery plan and other issues, preparing the parties' joint  
 7 Rule 26(f) report and the Receiver's initial disclosures, and developing a potential  
 8 settlement strategy and framework to resolve the case.

9 **14. Emmons Litigation.**

10 In connection with the "Emmons Litigation" category, Allen Matkins  
 11 personnel billed the following time and fees during the Application Period:

| Timekeeper | Position | Hourly Rate | Hours | Fees       |
|------------|----------|-------------|-------|------------|
| David Zaro | Partner  | \$837.00    | 1.7   | \$1,422.90 |
|            |          |             | 1.7   | \$1,422.90 |

15  
 16 The services in this category are associated with the litigation in the  
 17 Receiver's disgorgement action against alleged profiting investors Robert Emmons,  
 18 Christine Emmons, the Robert and Christine Emmons Family Trust, and the  
 19 Institute for Management and Marketing Pension Plan before this Court, captioned  
 20 as *Winkler v. Emmons, et al.* and bearing Case No. 2:21-cv-07267-FMO-AFM (the  
 21 "Emmons Action"). During the Application Period, Allen Matkins' limited work in  
 22 connection with the Emmons Action primarily consisted of handling typical  
 23 administrative litigation matters, including developing a potential settlement  
 24 strategy and framework to resolve the case, and conferring with opposing counsel  
 25 regarding settlement.

26 **15. McCloskey Litigation.**

27 In connection with the "McCloskey Litigation" category, Allen Matkins  
 28 personnel billed the following time and fees during the Application Period:

| Timekeeper          | Position  | Hourly Rate | Hours       | Fees               |
|---------------------|-----------|-------------|-------------|--------------------|
| David Zaro          | Partner   | \$837.00    | 13.2        | \$11,048.40        |
| Joshua del Castillo | Partner   | \$643.50    | 15.1        | \$9,716.85         |
| Norman Aspis        | Associate | \$445.50    | 0.9         | \$400.95           |
| Matthew Pham        | Associate | \$414.00    | 4.4         | \$1,821.60         |
| Rachel Rosenblum    | Law Clerk | \$202.50    | 2.6         | \$526.50           |
|                     |           |             | <b>36.2</b> | <b>\$23,514.30</b> |

7 The services in this category are associated with the litigation in the  
 8 Receiver's disgorgement action against alleged profiting investors Thomas D.  
 9 McCloskey Jr., Bonnie McCloskey, Cornerstone Holdings, LLC, and the  
 10 McCloskey Trust before this Court, captioned as *Winkler v. McCloskey, et al.* and  
 11 bearing Case No. 2:21-cv-05757-FMO-AFM (the "McCloskey Action"). During the  
 12 Application Period, Allen Matkins' work in connection with the McCloskey Action  
 13 primarily comprised of drafting the Receiver's first amended complaint (in lieu of  
 14 opposing the defendants' motion to dismiss the McCloskey Action, transfer venue,  
 15 or compel arbitration) and then preparing the Receiver's two oppositions to the  
 16 defendants' first amended and second amended motions seeking to dismiss, transfer  
 17 venue, or compel arbitration, requiring Allen Matkins to refute the defendants'  
 18 argument that fraudulent-transfer claims were not arbitrable. The Court has since  
 19 taken the defendants' second amended motion under submission.

20 Allen Matkins has expended additional time during the Application Period on  
 21 typical administrative litigation matters, including meeting and conferring with  
 22 opposing counsel on a discovery plan and other issues, preparing the parties' joint  
 23 Rule 26(f) report and the Receiver's initial disclosures, developing a potential  
 24 settlement strategy and framework to resolve the case, and conferring with opposing  
 25 counsel regarding settlement.

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1           **C. Expenses Incurred During the Application Period.**

2           In connection with its services rendered to the Receiver during the  
3 Application Period, Allen Matkins incurred \$28,738.53 in expenses. Allen Matkins'  
4 invoices, attached hereto as **Exhibit 2**, detail each of the firm's expenses.

5           The bulk of Allen Matkins' expenses during the Application Period was on  
6 account of (a) the monthly fees for hosting documents on an e-discovery platform  
7 (ranging from roughly \$2,400 to \$3,000 each month), (b) the Receiver's half of the  
8 mediator's fee (\$6,450) for the one-day settlement conference in the CVL Action,  
9 and (c) the expenses associated with the five depositions taken in the CVL Action  
10 (totaling almost \$10,000).

11 **V. THE FEES AND EXPENSES INCURRED ARE REASONABLE AND**  
12 **SHOULD BE ALLOWED.**

13           The Applicants respectfully submit that the fees and expenses incurred during  
14 the Application Period were fair, reasonable, necessary, and significantly benefited  
15 the Estate. Accordingly, as noted above, the Applicants request that the Court  
16 approve 100% of their respective fees and expenses as noted herein and also  
17 authorize the payment of those fees and expenses as requested herein.

18           The billing rates charged by the Applicants in this matter are consistent with,  
19 and comparable to, those charged in the community on similarly complex matters.  
20 Further, and as described in the concurrently filed memorandum of points and  
21 authorities submitted in support of this Fee Application, the invoices of the  
22 Applicants were submitted to the SEC for review prior to the filing of this Fee  
23 Application, and no objection to the Fee Application from the SEC is anticipated.

24 **VI. CONCLUSION.**

25           For the foregoing reasons, the Applicants respectfully request that the Court  
26 enter an order:

- 27           1. Granting this Fee Application in its entirety;
- 28



1           2.       Approving the Receiver's fees and expenses incurred during the  
2 Application Period, in the respective amounts of \$93,801.00 and \$2,150.43;

3           3.       Authorizing the Receiver to pay himself, on an interim basis, 80% of  
4 his approved fees incurred during the Application Period, in the amount of  
5 \$75,040.80, and 100% of his approved expenses incurred during the Application  
6 Period, in the amount of \$2,150.43, from the funds of the Receivership Estate;

7           4.       Approving Allen Matkins' fees and expenses incurred during the  
8 Application Period, in the respective amounts of \$402,426.45 and \$26,588.10;

9           5.       Authorizing the Receiver to pay Allen Matkins, on an interim basis,  
10 80% of its approved fees incurred during the Application Period, in the amount of  
11 \$321,941.16, and 100% of its approved expenses incurred during the Application  
12 Period, in the amount of \$26,588.10, from the funds of the Receivership Estate; and

13          6.       Providing such other and further relief as the Court deems just and  
14 proper under the circumstances.

15

16 Dated: March 25, 2022

ALLEN MATKINS LECK GAMBLE  
MALLORY & NATSIS LLP  
DAVID R. ZARO  
JOSHUA A. DEL CASTILLO  
MATTHEW D. PHAM

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By:           /s/ Matthew D. Pham

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MATTHEW D. PHAM  
Attorneys for Receiver  
GEOFF WINKLER

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**EXHIBIT 1**

**SEC v. Essex Capital Corporation  
Summary of Fees of Receiver and Retained Personnel  
October 1, 2021 - December 31, 2021  
(Sorted in Chronological Order by Activity Category)**

Attachment 1

| Personnel          | Item / Description   | Date      | Hours | Rate   | Amount | Activity Category                            |
|--------------------|--|-----------|-------|--------|--------|--|
| Josh McGraw        | Call with JBH - reviewing investor schedules   | 10/1/2021 | 0.8   | 225.00 | 180.00 | Financial - Forensic Accounting              |
| John Hall          | Review and respond to third party inquiry from counsel   | 10/1/2021 | 0.4   | 279.00 | 111.60 | Legal - Asset Analysis and Recovery          |
| Renee Diefenderfer | Follow up call to asset contact regarding documentation requested  | 10/1/2021 | 0.1   | 225.00 | 22.50  | Legal - Asset Analysis and Recovery          |
| Renee Diefenderfer | Review and asset updates to stretto  | 10/1/2021 | 0.2   | 225.00 | 45.00  | Legal - Asset Analysis and Recovery          |
| Renee Diefenderfer | Review of assets with JBH  | 10/1/2021 | 0.3   | 225.00 | 67.50  | Legal - Asset Analysis and Recovery          |
| Geoff Winkler      | Review memo from JBH re WR issues (.6), review pleadings (.3), review investor question (.2)   | 10/1/2021 | 1.1   | 315.00 | 346.50 | Legal - Case Administration                  |
| John Hall          | Work through outstanding issues with JPM   | 10/1/2021 | 0.8   | 279.00 | 223.20 | Legal - Case Administration                  |
| John Hall          | Review of outstanding assets with RLD  | 10/1/2021 | 0.3   | 279.00 | 83.70  | Legal - Case Administration                  |
| Renee Diefenderfer | Voicemail and follow up call to claimant regarding case updates  | 10/1/2021 | 0.2   | 225.00 | 45.00  | Legal - Case Administration                  |
| John Hall          | Review third party issues with CEH and WR schedules, memo to GBW and discussion with JPM   | 10/1/2021 | 2.0   | 279.00 | 558.00 | Legal - Claims Administration and Objections |
| Josh McGraw        | Forensic accounting - investor analysis  | 10/4/2021 | 0.5   | 225.00 | 112.50 | Financial - Forensic Accounting              |
| Renee Diefenderfer | Call, follow up with third party hardship applicant regarding bank statements  | 10/4/2021 | 0.3   | 225.00 | 67.50  | Legal - Asset Analysis and Recovery          |
| Renee Diefenderfer | Email follow up with third party recovery effort   | 10/4/2021 | 0.1   | 225.00 | 22.50  | Legal - Asset Analysis and Recovery          |
| Geoff Winkler      | Meeting with GBW, JBH, JPM, YKW to review tasks and next steps (.4), review counsel request, research, emails with JBH (.6), email to counsel re schedule (.1) | 10/4/2021 | 1.1   | 315.00 | 346.50 | Legal - Case Administration                  |
| John Hall          | Team meeting to discuss ongoing tasks  | 10/4/2021 | 0.4   | 279.00 | 111.60 | Legal - Case Administration                  |
| Josh McGraw        | Meeting with GBW, JBH, RLD, YKW to review tasks and next steps   | 10/4/2021 | 0.4   | 225.00 | 90.00  | Legal - Case Administration                  |
| Josh McGraw        | Email to counsel regarding investor schedules  | 10/4/2021 | 0.1   | 225.00 | 22.50  | Legal - Case Administration                  |
| Renee Diefenderfer | Meeting with GBW, JBH, JPM, YKW to review tasks and next steps   | 10/4/2021 | 0.4   | 225.00 | 90.00  | Legal - Case Administration                  |
| Ysabel Willits     | Meeting with GBW, RLD, JPM and JBH regarding case next steps   | 10/4/2021 | 0.4   | 150.00 | 60.00  | Legal - Case Administration                  |
| John Hall          | Review of TM claim file and review outstanding decision items with GBW   | 10/4/2021 | 0.6   | 279.00 | 167.40 | Legal - Claims Administration and Objections |
| Renee Diefenderfer | Asset review and communication   | 10/5/2021 | 1.2   | 225.00 | 270.00 | Legal - Asset Analysis and Recovery          |
| Geoff Winkler      | Review paper files for needed information (2.2)  | 10/5/2021 | 2.2   | 315.00 | 693.00 | Legal - Case Administration                  |
| Geoff Winkler      | Call with JBH and counsel (.6), research documentation re third party and emails with counsel (.4)   | 10/6/2021 | 1.0   | 315.00 | 315.00 | Legal - Asset Analysis and Recovery          |
| Renee Diefenderfer | Asset research, ownership, review, organization of documents per asset   | 10/6/2021 | 4.4   | 225.00 | 990.00 | Legal - Asset Analysis and Recovery          |
| Renee Diefenderfer | Email communication to counsel regarding asset and next steps  | 10/6/2021 | 0.3   | 225.00 | 67.50  | Legal - Asset Analysis and Recovery          |
| John Hall          | Review claim file on JF and discuss with GBW and counsel   | 10/6/2021 | 0.6   | 279.00 | 167.40 | Legal - Claims Administration and Objections |
| John Hall          | Working in Stretto system to get claims to pay and calculate correctly   | 10/6/2021 | 1.8   | 279.00 | 502.20 | Legal - Claims Administration and Objections |
| Renee Diefenderfer | Schedule review and address verification for counsel   | 10/7/2021 | 0.3   | 225.00 | 67.50  | Legal - Asset Analysis and Recovery          |
| Geoff Winkler      | Call with counsel and team (.6), review prior emails (.3)  | 10/7/2021 | 0.9   | 315.00 | 283.50 | Legal - Case Administration                  |
| John Hall          | Team meeting with GBW JPM RLD JDC DZ and NA  | 10/7/2021 | 0.6   | 279.00 | 167.40 | Legal - Case Administration                  |
| John Hall          | Review RI docs with RLD and correspondence re: same.   | 10/7/2021 | 0.2   | 279.00 | 55.80  | Legal - Case Administration                  |
| Josh McGraw        | Meeting with counsel   | 10/7/2021 | -     | 225.00 | -      | Legal - Case Administration                  |
| Renee Diefenderfer | Call with counsel to determine case next steps   | 10/7/2021 | 0.6   | 225.00 | 135.00 | Legal - Case Administration                  |
| Renee Diefenderfer | Communication with JPM regarding claim   | 10/7/2021 | 0.1   | 225.00 | 22.50  | Legal - Case Administration                  |
| Renee Diefenderfer | Review of RI docs with JBH   | 10/7/2021 | 0.2   | 225.00 | 45.00  | Legal - Case Administration                  |
| John Hall          | Correcting and reviewing all claims for correctness, producing schedules, reporting completion and next steps to team  | 10/7/2021 | 3.1   | 279.00 | 864.90 | Legal - Claims Administration and Objections |
| Josh McGraw        | Email to JBH about claimant  | 10/7/2021 | 0.1   | 225.00 | 22.50  | Legal - Claims Administration and Objections |
| Josh McGraw        | Communication with RLD about claimant  | 10/7/2021 | 0.1   | 225.00 | 22.50  | Legal - Claims Administration and Objections |
| Renee Diefenderfer | Review of refinancing dates and accounting per task from JBH   | 10/8/2021 | 1.9   | 225.00 | 427.50 | Legal - Asset Analysis and Recovery          |
| Renee Diefenderfer | Assets organizing  | 10/8/2021 | -     | 225.00 | -      | Legal - Asset Analysis and Recovery          |
| Renee Diefenderfer | Follow up with third party regarding completing settlement, verification of email, documents, payments, and voicemail  | 10/8/2021 | 0.3   | 225.00 | 67.50  | Legal - Asset Analysis and Recovery          |
| Geoff Winkler      | Review and discuss investor communication with RLD (.1), review and process wire, emails with RLD (.3)   | 10/8/2021 | 0.4   | 315.00 | 126.00 | Legal - Case Administration                  |

**SEC v. Essex Capital Corporation**  
**Summary of Fees of Receiver and Retained Personnel**  
**October 1, 2021 - December 31, 2021**  
**(Sorted in Chronological Order by Activity Category)**

Attachment 1

| Personnel          | Item / Description   | Date       | Hours | Rate   | Amount | Activity Category                            |
|--------------------|--|------------|-------|--------|--------|--|
| John Hall          | Discuss PL items with RLD for her analysis.  | 10/8/2021  | 0.3   | 279.00 | 83.70  | Legal - Case Administration                  |
| John Hall          | Review final statement from CGF on final distribution for completed asset  | 10/8/2021  | 0.2   | 279.00 | 55.80  | Legal - Case Administration                  |
| Josh McGraw        | Call with RLD - real estate research for refinances  | 10/8/2021  | 0.4   | 225.00 | 90.00  | Legal - Case Administration                  |
| Renee Diefenderfer | Email review sent by claimant, communication to GBW  | 10/8/2021  | 0.1   | 225.00 | 22.50  | Legal - Case Administration                  |
| Renee Diefenderfer | Real-estate research and claims discussion with JPM  | 10/8/2021  | 0.4   | 225.00 | 90.00  | Legal - Case Administration                  |
| Renee Diefenderfer | Update to determination letter and email communication with claimant   | 10/8/2021  | 0.2   | 225.00 | 45.00  | Legal - Case Administration                  |
| John Hall          | Review claim and overview with JPM   | 10/8/2021  | 0.4   | 279.00 | 111.60 | Legal - Claims Administration and Objections |
| Josh McGraw        | Review claim and overview with JBH   | 10/8/2021  | 0.4   | 225.00 | 90.00  | Legal - Claims Administration and Objections |
| Josh McGraw        | Email to JBH regarding claimant  | 10/8/2021  | 0.1   | 225.00 | 22.50  | Legal - Claims Administration and Objections |
| Geoff Winkler      | Meeting with team to discuss case (.4), review draft letter, review suggested edits (.3)   | 10/11/2021 | 0.7   | 315.00 | 220.50 | Legal - Case Administration                  |
| John Hall          | Team meeting to discuss ongoing tasks  | 10/11/2021 | 0.4   | 279.00 | 111.60 | Legal - Case Administration                  |
| Josh McGraw        | Meeting with GBW, JBH, RLD, YKW to review tasks and next steps   | 10/11/2021 | 0.4   | 225.00 | 90.00  | Legal - Case Administration                  |
| Milana Barkhanoy   | Meeting with GBW, RLD, JPM, YKW, and JBH regarding case next steps   | 10/11/2021 | 0.4   | 225.00 | 90.00  | Legal - Case Administration                  |
| Renee Diefenderfer | Team meeting to discuss next steps and action items  | 10/11/2021 | 0.4   | 225.00 | 90.00  | Legal - Case Administration                  |
| Ysabel Willits     | Meeting with GBW, RLD, JPM, MBB, and JBH regarding case next steps   | 10/11/2021 | 0.4   | 150.00 | 60.00  | Legal - Case Administration                  |
| Geoff Winkler      | Review request and email correspondence (.8)   | 10/12/2021 | 0.8   | 315.00 | 252.00 | Legal - Case Administration                  |
| Renee Diefenderfer | Follow up email to investor  | 10/12/2021 | 0.1   | 225.00 | 22.50  | Legal - Case Administration                  |
| John Hall          | Review proposed distribution plan, discuss with team   | 10/12/2021 | 1.2   | 279.00 | 334.80 | Legal - Claims Administration and Objections |
| Renee Diefenderfer | Third party database updates for call with counsel   | 10/13/2021 | 2.1   | 225.00 | 472.50 | Legal - Asset Analysis and Recovery          |
| Renee Diefenderfer | Meeting with JPM regarding investor schedules for third party  | 10/13/2021 | 0.6   | 225.00 | 135.00 | Legal - Asset Analysis and Recovery          |
| Geoff Winkler      | Call with RLD re investor communication (.1), call with investor (.3)  | 10/13/2021 | 0.4   | 315.00 | 126.00 | Legal - Case Administration                  |
| John Hall          | Review and update agenda with RLD  | 10/13/2021 | 0.1   | 279.00 | 27.90  | Legal - Case Administration                  |
| Josh McGraw        | Updated investor schedules in files for RLD  | 10/13/2021 | 0.4   | 225.00 | 90.00  | Legal - Case Administration                  |
| Josh McGraw        | Meeting with RLD regarding investor schedule   | 10/13/2021 | 0.6   | 225.00 | 135.00 | Legal - Case Administration                  |
| Renee Diefenderfer | Communication with GBW regarding investor communication  | 10/13/2021 | 0.1   | 225.00 | 22.50  | Legal - Case Administration                  |
| Renee Diefenderfer | Claimant follow up regarding determination letter  | 10/13/2021 | 0.1   | 225.00 | 22.50  | Legal - Case Administration                  |
| Renee Diefenderfer | Email communication with investor  | 10/13/2021 | 0.1   | 225.00 | 22.50  | Legal - Case Administration                  |
| Renee Diefenderfer | Call from investor   | 10/13/2021 | 0.1   | 225.00 | 22.50  | Legal - Case Administration                  |
| Renee Diefenderfer | Email communication with investor  | 10/13/2021 | 0.1   | 225.00 | 22.50  | Legal - Case Administration                  |
| Renee Diefenderfer | Review and update agenda with JBH  | 10/13/2021 | 0.1   | 225.00 | 22.50  | Legal - Case Administration                  |
| Renee Diefenderfer | Information update to stretto and communication of determination letter from claimant  | 10/13/2021 | 0.1   | 225.00 | 22.50  | Legal - Case Administration                  |
| Milana Barkhanoy   | Discussing RI Tax Issues with JBH.   | 10/14/2021 | 1.2   | 225.00 | 270.00 | Financial - Tax Issues                       |
| Renee Diefenderfer | Email follow up question to counsel  | 10/14/2021 | 0.1   | 225.00 | 22.50  | Legal - Asset Analysis and Recovery          |
| John Hall          | Team call with counsel to discuss ongoing issues (.9), follow up with MBB on tax task (.4)   | 10/14/2021 | 1.3   | 279.00 | 362.70 | Legal - Case Administration                  |
| Josh McGraw        | Call with counsel  | 10/14/2021 | -     | 225.00 | -      | Legal - Case Administration                  |
| Renee Diefenderfer | Email communication with counsel for agenda and call prep  | 10/14/2021 | 0.1   | 225.00 | 22.50  | Legal - Case Administration                  |
| Renee Diefenderfer | Call with counsel to determine case next steps   | 10/14/2021 | 0.9   | 225.00 | 202.50 | Legal - Case Administration                  |
| Renee Diefenderfer | Team communication regarding case updates  | 10/14/2021 | 0.1   | 225.00 | 22.50  | Legal - Case Administration                  |
| Geoff Winkler      | Team call to discuss updates, review materials (.6), review and update claims register, email to counsel re claims register, review claims motion, email to JBH (1.1), emails with claimant (.1) | 10/14/2021 | 1.8   | 315.00 | 567.00 | Legal - Claims Administration and Objections |
| John Hall          | Review schedule and discuss with team determination  | 10/14/2021 | 0.3   | 279.00 | 83.70  | Legal - Claims Administration and Objections |
| John Hall          | Affected claimant FAQ  | 10/14/2021 | 0.2   | 279.00 | 55.80  | Legal - Claims Administration and Objections |
| John Hall          | Drafting needed info for notice of motion to approve claims  | 10/14/2021 | 2.6   | 279.00 | 725.40 | Legal - Claims Administration and Objections |
| Renee Diefenderfer | Review of accounting for details on potential asset  | 10/15/2021 | 1.8   | 225.00 | 405.00 | Legal - Asset Analysis and Recovery          |

**SEC v. Essex Capital Corporation**  
**Summary of Fees of Receiver and Retained Personnel**  
**October 1, 2021 - December 31, 2021**  
**(Sorted in Chronological Order by Activity Category)**

Attachment 1

| Personnel          | Item / Description   | Date       | Hours | Rate   | Amount | Activity Category                   |
|--------------------|--|------------|-------|--------|--------|-------------------------------------|
| Geoff Winkler      | Review invoices, prepare for JBH (.1), review email for information needed for claims (.8), call with claimant (.3)  | 10/15/2021 | 1.2   | 315.00 | 378.00 | Legal - Case Administration         |
| John Hall          | Review tax issues with YKW   | 10/15/2021 | 0.1   | 279.00 | 27.90  | Legal - Case Administration         |
| Ysabel Willits     | Meeting with JBH regarding tax update  | 10/15/2021 | 0.1   | 150.00 | 15.00  | Legal - Case Administration         |
| John Hall          | Forensic accounting; identification of two additional third party recovery targets   | 10/18/2021 | 3.4   | 279.00 | 948.60 | Financial - Forensic Accounting     |
| Geoff Winkler      | Team call to discuss status (.1), call from interested party, research, internal discussion (.6), email review for discovery (1.3)   | 10/18/2021 | 2.0   | 315.00 | 630.00 | Legal - Case Administration         |
| John Hall          | Team call to discuss ongoing casework  | 10/18/2021 | 0.1   | 279.00 | 27.90  | Legal - Case Administration         |
| John Hall          | Direct staff on FAQ standards  | 10/18/2021 | 0.2   | 279.00 | 55.80  | Legal - Case Administration         |
| Josh McGraw        | Meeting with GBW, JBH, RLD, YKW to review tasks and next steps   | 10/18/2021 | 0.1   | 225.00 | 22.50  | Legal - Case Administration         |
| Milana Barkhanoy   | Meeting with GBW, RLD, JPM, YKW, and JBH regarding upcoming and long term tasks.   | 10/18/2021 | 0.1   | 225.00 | 22.50  | Legal - Case Administration         |
| Milana Barkhanoy   | RI Tax return project assigned by JBH.   | 10/18/2021 | 0.2   | 225.00 | 45.00  | Legal - Case Administration         |
| Renee Diefenderfer | Meeting with AFS team regarding tasks and next steps   | 10/18/2021 | 0.1   | 225.00 | 22.50  | Legal - Case Administration         |
| Ysabel Willits     | Meeting with GBW, RLD, JPM, MBB, and JBH regarding upcoming and long term tasks  | 10/18/2021 | 0.1   | 150.00 | 15.00  | Legal - Case Administration         |
| Geoff Winkler      | Review and prepare documents for reporting purposes (1.4), call with third party (.3)  | 10/19/2021 | 1.7   | 315.00 | 535.50 | Legal - Case Administration         |
| Renee Diefenderfer | Task review per JBH for disgorgement and coordination with JPM   | 10/21/2021 | 0.2   | 225.00 | 45.00  | Legal - Asset Analysis and Recovery |
| Renee Diefenderfer | Email communication with investor regarding update   | 10/21/2021 | 0.1   | 225.00 | 22.50  | Legal - Case Administration         |
| Renee Diefenderfer | Phone call communication with investor regarding update  | 10/21/2021 | 0.2   | 225.00 | 45.00  | Legal - Case Administration         |
| Renee Diefenderfer | Information review per email sent by JBH for investor updates  | 10/21/2021 | 0.1   | 225.00 | 22.50  | Legal - Case Administration         |
| Renee Diefenderfer | Asset review and investigation   | 10/22/2021 | -     | 225.00 | -      | Legal - Asset Analysis and Recovery |
| Geoff Winkler      | Prepare SFAR and begin drafting report (1.7), emails with counsel re CVL (.2)  | 10/25/2021 | 1.9   | 315.00 | 598.50 | Financial - Accounting/Auditing     |
| Milana Barkhanoy   | RI tax return project assigned by JBH.   | 10/25/2021 | 0.2   | 225.00 | 45.00  | Financial - Accounting/Auditing     |
| Renee Diefenderfer | Document processing  | 10/25/2021 | 0.2   | 225.00 | 45.00  | Legal - Case Administration         |
| Renee Diefenderfer | Website update with email addresses  | 10/25/2021 | 1.6   | 225.00 | 360.00 | Legal - Case Administration         |
| Geoff Winkler      | Call with investor to discuss status of case, litigation, discussion with RLD (.4), process deposits (.2), emails with counsel re CVL (.2), review RLD question re asset, respond (.1), emails with NA re CVL (.1) | 10/26/2021 | 1.0   | 315.00 | 315.00 | Legal - Case Administration         |
| Geoff Winkler      | Review legal invoices (.2), email to counsel re report (.1), email to NA, call with NA re CVL (.4), prepare accounting (1.2)   | 10/27/2021 | 1.9   | 315.00 | 598.50 | Financial - Accounting/Auditing     |
| Milana Barkhanoy   | RI Tax return project assigned by JBH.   | 10/28/2021 | 0.6   | 225.00 | 135.00 | Financial - Accounting/Auditing     |
| Milana Barkhanoy   | Call with JBH on tax return project  | 10/28/2021 | 0.6   | 225.00 | 135.00 | Financial - Accounting/Auditing     |
| Milana Barkhanoy   | RI Tax return project assigned by JBH.   | 10/28/2021 | 0.3   | 225.00 | 67.50  | Financial - Accounting/Auditing     |
| Milana Barkhanoy   | Call with JBH on Tax return project  | 10/28/2021 | 0.2   | 225.00 | 45.00  | Financial - Accounting/Auditing     |
| Milana Barkhanoy   | Email team on Tax return project   | 10/28/2021 | 0.1   | 225.00 | 22.50  | Financial - Accounting/Auditing     |
| Josh McGraw        | Schedule creation of dates for net winners with RLD  | 10/28/2021 | 0.4   | 225.00 | 90.00  | Legal - Asset Analysis and Recovery |
| Renee Diefenderfer | Follow up with net winner on settlement, via text, calendar invite   | 10/28/2021 | 0.2   | 225.00 | 45.00  | Legal - Asset Analysis and Recovery |
| Renee Diefenderfer | Schedule creation and updates with JPM for net winners   | 10/28/2021 | 0.4   | 225.00 | 90.00  | Legal - Asset Analysis and Recovery |
| Geoff Winkler      | Team call to discuss case and third party updates (.8), review email from KA (.1)  | 10/28/2021 | 0.9   | 315.00 | 283.50 | Legal - Case Administration         |
| John Hall          | Work with MBB on finishing and analysis of RI taxes  | 10/28/2021 | 0.8   | 279.00 | 223.20 | Legal - Case Administration         |
| John Hall          | Team meeting GBW JPM MBB RLD NA DZ JDC   | 10/28/2021 | 0.8   | 279.00 | 223.20 | Legal - Case Administration         |
| John Hall          | Propose 2018 tax treatment for DFS loan to team  | 10/28/2021 | 0.3   | 279.00 | 83.70  | Legal - Case Administration         |
| Josh McGraw        | Call with Counsel  | 10/28/2021 | -     | 225.00 | -      | Legal - Case Administration         |
| Josh McGraw        | Email to MBB for tax returns   | 10/28/2021 | 0.1   | 225.00 | 22.50  | Legal - Case Administration         |
| Milana Barkhanoy   | Team call with Council   | 10/28/2021 | 0.8   | 225.00 | 180.00 | Legal - Case Administration         |
| Renee Diefenderfer | Essex task email to JPM for call with counsel  | 10/28/2021 | 0.1   | 225.00 | 22.50  | Legal - Case Administration         |
| Renee Diefenderfer | Call with counsel to determine case next steps   | 10/28/2021 | 0.2   | 225.00 | 45.00  | Legal - Case Administration         |

**SEC v. Essex Capital Corporation**  
**Summary of Fees of Receiver and Retained Personnel**  
**October 1, 2021 - December 31, 2021**  
**(Sorted in Chronological Order by Activity Category)**

Attachment 1

| Personnel          | Item / Description   | Date       | Hours | Rate   | Amount | Activity Category                            |
|--------------------|--|------------|-------|--------|--------|--|
| Renee Diefenderfer | Demand letter review and follow up to GBW and counsel  | 10/29/2021 | 0.1   | 225.00 | 22.50  | Legal - Asset Analysis and Recovery          |
| Geoff Winkler      | Review email re CVL litigation (.1), review demand letter and comment to NA, RLD (.2), respond to email from claimant (.1), email to NA re CVL (.1)  | 10/29/2021 | 0.5   | 315.00 | 157.50 | Legal - Case Administration                  |
| Geoff Winkler      | Team discussion about case tasks (.4), emails with counsel re notice of claims (.1), emails with RLD re timing (.1), emails with NA re CVL (.1)  | 11/1/2021  | 0.7   | 315.00 | 220.50 | Legal - Case Administration                  |
| John Hall          | Team meeting with GBW MBB JPM RLD  | 11/1/2021  | 0.4   | 279.00 | 111.60 | Legal - Case Administration                  |
| Josh McGraw        | Meeting with GBW, JBH, RLD, MBB to review tasks and next steps   | 11/1/2021  | 0.4   | 225.00 | 90.00  | Legal - Case Administration                  |
| Milana Barkhanoy   | Team meeting with GBW, RLD, JPM, and JBH on tasks and next steps   | 11/1/2021  | 0.4   | 225.00 | 90.00  | Legal - Case Administration                  |
| Renee Diefenderfer | Email follow up regarding investor communication to JBH and AFS team   | 11/1/2021  | 0.1   | 225.00 | 22.50  | Legal - Case Administration                  |
| Renee Diefenderfer | Meeting with AFS team regarding tasks and next steps   | 11/1/2021  | 0.4   | 225.00 | 90.00  | Legal - Case Administration                  |
| Renee Diefenderfer | Update to AFS team notes   | 11/1/2021  | -     | 225.00 | -      | Legal - Case Administration                  |
| Renee Diefenderfer | Meeting with JBH regarding accounting file and next steps  | 11/1/2021  | 0.4   | 225.00 | 90.00  | Legal - Case Administration                  |
| John Hall          | Reviewing BH claim with RLD  | 11/1/2021  | 0.4   | 279.00 | 111.60 | Legal - Claims Administration and Objections |
| John Hall          | Reviewing claimant FAQ best practices with team  | 11/1/2021  | 0.2   | 279.00 | 55.80  | Legal - Claims Administration and Objections |
| John Hall          | Draft disputed claim correspondence and discuss with team; discuss need for anonymized or partial claimant info on report and associated notifications                                     | 11/1/2021  | 0.5   | 279.00 | 139.50 | Legal - Claims Administration and Objections |
| Geoff Winkler      | Review request and research (.5), call with NA re CVL litigation (.4)  | 11/2/2021  | 0.9   | 315.00 | 283.50 | Legal - Asset Analysis and Recovery          |
| John Hall          | Review quarterly UGI reports   | 11/2/2021  | 0.2   | 279.00 | 55.80  | Legal - Asset Analysis and Recovery          |
| Renee Diefenderfer | Letter preparation for mailing   | 11/2/2021  | 0.2   | 225.00 | 45.00  | Legal - Case Administration                  |
| Geoff Winkler      | Emails with counsel re deposition timing (.2), review documents for litigation support (.1.4)  | 11/3/2021  | 1.6   | 315.00 | 504.00 | Legal - Asset Analysis and Recovery          |
| Ysabel Willits     | Meeting with RLD regarding asset recovery  | 11/3/2021  | 0.1   | 150.00 | 15.00  | Legal - Asset Analysis and Recovery          |
| Renee Diefenderfer | Email communication with investor and GBW  | 11/3/2021  | 0.1   | 225.00 | 22.50  | Legal - Case Administration                  |
| Renee Diefenderfer | Email update to investor   | 11/3/2021  | 0.1   | 225.00 | 22.50  | Legal - Case Administration                  |
| Renee Diefenderfer | Updates to tasks in OneNote for team huddle  | 11/3/2021  | -     | 225.00 | -      | Legal - Case Administration                  |
| Renee Diefenderfer | Communication with YKW regarding task on accounting  | 11/3/2021  | 0.1   | 225.00 | 22.50  | Legal - Case Administration                  |
| Renee Diefenderfer | Call with YKW regarding accounting task assignment   | 11/3/2021  | 0.1   | 225.00 | 22.50  | Legal - Case Administration                  |
| Geoff Winkler      | Call with counsel and team (.5), follow up with JBH and RLD (.1), discussion with JBH re tasks (.3),   | 11/4/2021  | 0.9   | 315.00 | 283.50 | Legal - Case Administration                  |
| John Hall          | Team meeting with counsel to discuss ongoing third party issues and claims motion (.6), follow up with RLD and GBW (.1)  | 11/4/2021  | 0.6   | 279.00 | 167.40 | Legal - Case Administration                  |
| John Hall          | Review and edit motion to allow claims and distribution method   | 11/4/2021  | 1.5   | 279.00 | 418.50 | Legal - Case Administration                  |
| John Hall          | Read JG transcript from NA, discuss with GBW   | 11/4/2021  | 2.0   | 279.00 | 558.00 | Legal - Case Administration                  |
| Renee Diefenderfer | VM from investor and return call   | 11/4/2021  | 0.2   | 225.00 | 45.00  | Legal - Case Administration                  |
| Renee Diefenderfer | Email follow up with investor regarding case update  | 11/4/2021  | 0.1   | 225.00 | 22.50  | Legal - Case Administration                  |
| Renee Diefenderfer | Call with counsel to determine case next steps   | 11/4/2021  | 0.5   | 225.00 | 112.50 | Legal - Case Administration                  |
| Renee Diefenderfer | Notes/updates on tasks email sent to AFS team  | 11/4/2021  | 0.1   | 225.00 | 22.50  | Legal - Case Administration                  |
| Renee Diefenderfer | Follow up with counsel regarding documentation for asset   | 11/4/2021  | 0.1   | 225.00 | 22.50  | Legal - Case Administration                  |
| Renee Diefenderfer | Call with GBW and JBH following call with counsel  | 11/4/2021  | 0.1   | 225.00 | 22.50  | Legal - Case Administration                  |
| Geoff Winkler      | Prepare for upcoming deposition (1.2)  | 11/5/2021  | 1.2   | 315.00 | 378.00 | Legal - Asset Analysis and Recovery          |
| Josh McGraw        | Demand letters and investor schedules  | 11/5/2021  | 0.2   | 225.00 | 45.00  | Legal - Asset Analysis and Recovery          |
| John Hall          | Affected claimant FAQ  | 11/5/2021  | 0.2   | 279.00 | 55.80  | Legal - Claims Administration and Objections |
| Geoff Winkler      | Team meeting to discuss case updates (0.2), review documents, emails with counsel re report (.3), review discovery in preparation for upcoming litigation (1.1), review SFAR with JBH (.2) | 11/8/2021  | 1.8   | 315.00 | 567.00 | Legal - Asset Analysis and Recovery          |
| John Hall          | Review quarterly report regarding capital call and distribution from UFP   | 11/8/2021  | 0.2   | 279.00 | 55.80  | Legal - Asset Analysis and Recovery          |
| Josh McGraw        | Call with JBH to discuss investor schedules  | 11/8/2021  | 0.4   | 225.00 | 90.00  | Legal - Asset Analysis and Recovery          |
| Renee Diefenderfer | Update on task from counsel and email response   | 11/8/2021  | 0.1   | 225.00 | 22.50  | Legal - Asset Analysis and Recovery          |
| Renee Diefenderfer | Meeting with JPM regarding accounting/demand task  | 11/8/2021  | 0.1   | 225.00 | 22.50  | Legal - Asset Analysis and Recovery          |

**SEC v. Essex Capital Corporation**  
**Summary of Fees of Receiver and Retained Personnel**  
**October 1, 2021 - December 31, 2021**  
**(Sorted in Chronological Order by Activity Category)**

Attachment 1

| Personnel          | Item / Description   | Date       | Hours | Rate   | Amount   | Activity Category                   |
|--------------------|--|------------|-------|--------|----------|-------------------------------------|
| Ysabel Willits     | Exploring accounting file for mortgage transactions  | 11/8/2021  | 0.2   | 150.00 | 30.00    | Legal - Asset Analysis and Recovery |
| John Hall          | Team meeting to discuss ongoing tasks  | 11/8/2021  | 0.2   | 279.00 | 55.80    | Legal - Case Administration         |
| John Hall          | Review third party issues with JPM   | 11/8/2021  | 0.4   | 279.00 | 111.60   | Legal - Case Administration         |
| John Hall          | Review SFAR with GBW   | 11/8/2021  | 0.2   | 279.00 | 55.80    | Legal - Case Administration         |
| John Hall          | Review MJ banking issues   | 11/8/2021  | 0.1   | 279.00 | 27.90    | Legal - Case Administration         |
| John Hall          | Research DFS loan and propose approach to DZ and JdC   | 11/8/2021  | 0.9   | 279.00 | 251.10   | Legal - Case Administration         |
| John Hall          | Communication with JPM regarding investor schedule and accounting file                                   | 11/8/2021  | 0.1   | 279.00 | 27.90    | Legal - Case Administration         |
| Josh McGraw        | Meeting with GBW, JBH, RLD, YKW to review tasks and next steps   | 11/8/2021  | 0.2   | 225.00 | 45.00    | Legal - Case Administration         |
| Josh McGraw        | Call with RLD to discuss updating investor schedules   | 11/8/2021  | 0.1   | 225.00 | 22.50    | Legal - Case Administration         |
| Josh McGraw        | Investor schedules and letters   | 11/8/2021  | 1.5   | 225.00 | 337.50   | Legal - Case Administration         |
| Josh McGraw        | Communication with JBH regarding investor schedule and accounting file                                   | 11/8/2021  | 0.1   | 225.00 | 22.50    | Legal - Case Administration         |
| Milana Barkhanoy   | Team Meeting with GBW, RLD, JPM, YKW and JBH on tasks and next steps                                     | 11/8/2021  | 0.2   | 225.00 | 45.00    | Legal - Case Administration         |
| Renee Diefenderfer | Meeting with the team about tasks and next steps   | 11/8/2021  | 0.2   | 225.00 | 45.00    | Legal - Case Administration         |
| Renee Diefenderfer | Meeting with GBW, RLD, JPM, MBB, and JBH regarding upcoming and long term tasks                          | 11/8/2021  | 0.2   | 225.00 | 45.00    | Legal - Case Administration         |
| Ysabel Willits     | Review RLD demand letters, schedules and backup materials.   | 11/8/2021  | 0.2   | 150.00 | 30.00    | Legal - Case Administration         |
| John Hall          | Review RLD demand letters, schedules and backup materials.   | 11/9/2021  | 0.5   | 279.00 | 139.50   | Legal - Asset Analysis and Recovery |
| Josh McGraw        | Communication and planning with RLD via message to get demand letters sent                               | 11/9/2021  | 0.2   | 225.00 | 45.00    | Legal - Asset Analysis and Recovery |
| Josh McGraw        | Call with RLD about mail merge and updating third party tracker  | 11/9/2021  | 0.2   | 225.00 | 45.00    | Legal - Asset Analysis and Recovery |
| Josh McGraw        | Demand letters and investor schedules email to GBW   | 11/9/2021  | 0.1   | 225.00 | 22.50    | Legal - Asset Analysis and Recovery |
| Renee Diefenderfer | Communication and planning with JPM via message to get demand letters sent                               | 11/9/2021  | 0.2   | 225.00 | 45.00    | Legal - Asset Analysis and Recovery |
| Renee Diefenderfer | Call with JPM about mail merge and updating third party tracker  | 11/9/2021  | 0.2   | 225.00 | 45.00    | Legal - Asset Analysis and Recovery |
| Renee Diefenderfer | Prepare mailing for third party recovery   | 11/9/2021  | 0.3   | 225.00 | 67.50    | Legal - Asset Analysis and Recovery |
| Renee Diefenderfer | Demand letters and schedules to GBW and JBH  | 11/9/2021  | 0.1   | 225.00 | 22.50    | Legal - Asset Analysis and Recovery |
| Renee Diefenderfer | Review proposed letter and comment (.1), review email from counsel, email requested documentation (.1)   | 11/9/2021  | 0.2   | 315.00 | 63.00    | Legal - Case Administration         |
| Geoff Winkler      | Call with RLD for demand letter  | 11/9/2021  | 0.3   | 225.00 | 67.50    | Legal - Case Administration         |
| Josh McGraw        | Call with RLD for demand letter  | 11/9/2021  | 0.3   | 225.00 | 67.50    | Legal - Case Administration         |
| Renee Diefenderfer | Prepare two more mailings for third party recovery   | 11/9/2021  | 0.4   | 225.00 | 90.00    | Legal - Case Administration         |
| Renee Diefenderfer | Call with JPM regarding demand letter edits  | 11/9/2021  | 0.3   | 225.00 | 67.50    | Legal - Case Administration         |
| Geoff Winkler      | Emails with counsel re mediation planning (.1)   | 11/10/2021 | 0.1   | 315.00 | 31.50    | Legal - Asset Analysis and Recovery |
| John Hall          | Review two demand letters and schedules, request updates to finalize them                                | 11/10/2021 | 0.4   | 279.00 | 111.60   | Legal - Asset Analysis and Recovery |
| John Hall          | Discuss needs for third party issues with MP   | 11/10/2021 | 0.8   | 279.00 | 223.20   | Legal - Asset Analysis and Recovery |
| Renee Diefenderfer | Update to schedules for demands  | 11/10/2021 | 0.2   | 225.00 | 45.00    | Legal - Asset Analysis and Recovery |
| Renee Diefenderfer | Analysis of accounting files and demonstration of ongoing PS for counsel's use in third party activities | 11/10/2021 | 0.2   | 225.00 | 45.00    | Legal - Asset Analysis and Recovery |
| John Hall          | Processing nine outstanding tax requests, working with JC at MK  | 11/11/2021 | 4.9   | 279.00 | 1,367.10 | Financial - Forensic Accounting     |
| John Hall          | Processing nine outstanding tax requests, working with JC at MK  | 11/11/2021 | 2.9   | 279.00 | 809.10   | Financial - Tax Issues              |
| John Hall          | Review Forms 940 and W2 and W3 reports   | 11/11/2021 | 0.3   | 279.00 | 83.70    | Financial - Tax Issues              |
| John Hall          | Email follow up to GBW regarding identifying next steps for third party investor demand                  | 11/11/2021 | 0.1   | 225.00 | 22.50    | Legal - Asset Analysis and Recovery |
| Renee Diefenderfer | Finalize mailings to be sent for demand letters and schedules, update third party tracker                | 11/11/2021 | 0.1   | 225.00 | 22.50    | Legal - Asset Analysis and Recovery |
| Renee Diefenderfer | Call with counsel to discuss litigation status and needs (1.0), email to counsel re BGD settlement (.1)  | 11/11/2021 | 0.4   | 225.00 | 90.00    | Legal - Asset Analysis and Recovery |
| Geoff Winkler      | Task communication with JBH  | 11/11/2021 | 1.1   | 315.00 | 346.50   | Legal - Case Administration         |
| Milana Barkhanoy   | Task communication with JBH  | 11/11/2021 | 0.1   | 225.00 | 22.50    | Legal - Case Administration         |
| Milana Barkhanoy   | Reading communication from RLD on summary from call with counsel   | 11/11/2021 | 0.1   | 225.00 | 22.50    | Legal - Case Administration         |
| Milana Barkhanoy   | Call with PC of NY requesting documents  | 11/11/2021 | 0.5   | 225.00 | 112.50   | Legal - Case Administration         |
| Milana Barkhanoy   | Review and forwarding files from PC to JBH   | 11/11/2021 | 0.1   | 225.00 | 22.50    | Legal - Case Administration         |
| Renee Diefenderfer | Call with claimant regarding case updates  | 11/11/2021 | 0.2   | 225.00 | 45.00    | Legal - Case Administration         |
| Renee Diefenderfer | Call with counsel to determine case next steps   | 11/11/2021 | 1.0   | 225.00 | 225.00   | Legal - Case Administration         |
| Renee Diefenderfer | Email to the team regarding updates from counsel   | 11/11/2021 | 0.1   | 225.00 | 22.50    | Legal - Case Administration         |

**SEC v. Essex Capital Corporation**  
**Summary of Fees of Receiver and Retained Personnel**  
**October 1, 2021 - December 31, 2021**  
**(Sorted in Chronological Order by Activity Category)**

Attachment 1

| Personnel          | Item / Description   | Date       | Hours | Rate   | Amount   | Activity Category                            |
|--------------------|--|------------|-------|--------|----------|--|
| Renee Diefenderfer | Coordinate and discuss claims notice task with JPM   | 11/11/2021 | 0.3   | 225.00 | 67.50    | Legal - Case Administration                  |
| John Hall          | Coordinate and discuss claims notice task with RLD   | 11/11/2021 | 0.3   | 279.00 | 83.70    | Legal - Claims Administration and Objections |
| John Hall          | Analysis of accounting files and demonstration of ongoing Ponzi for counsel's use in third party activities; email final report to counsel   | 11/12/2021 | 6.2   | 279.00 | 1,729.80 | Financial - Forensic Accounting              |
| Ysabel Willits     | Searching for mortgage refinance dates   | 11/12/2021 | 3.5   | 150.00 | 525.00   | Legal - Asset Analysis and Recovery          |
| Ysabel Willits     | Quick check in with JBH regarding mortgage refinance dates   | 11/12/2021 | 0.1   | 150.00 | 15.00    | Legal - Asset Analysis and Recovery          |
| Geoff Winkler      | Process wire transfer (.2)   | 11/12/2021 | 0.2   | 315.00 | 63.00    | Legal - Case Administration                  |
| John Hall          | Discuss Penny Lane mortgage with YKW (.1), review accounting (.3)  | 11/12/2021 | 0.3   | 279.00 | 83.70    | Legal - Case Administration                  |
| Milana Barkhanoy   | Reading communication from JBH to MP   | 11/12/2021 | 0.1   | 225.00 | 22.50    | Legal - Case Administration                  |
| John Hall          | Review request from MP and pull needed third party schedules   | 11/15/2021 | 0.8   | 279.00 | 223.20   | Legal - Asset Analysis and Recovery          |
| Renee Diefenderfer | Confirmation of third parties for JBH  | 11/15/2021 | 0.2   | 225.00 | 45.00    | Legal - Asset Analysis and Recovery          |
| Geoff Winkler      | Review draft report, research required information, emails with counsel (.5), emails with counsel re deposition preparation (.1)   | 11/15/2021 | 0.6   | 315.00 | 189.00   | Legal - Case Administration                  |
| John Hall          | Review Ninth receivership report and discuss recommendations with GBW  | 11/15/2021 | 0.4   | 279.00 | 111.60   | Legal - Case Administration                  |
| Milana Barkhanoy   | Reading communication from JBH to MP   | 11/15/2021 | 0.1   | 225.00 | 22.50    | Legal - Case Administration                  |
| Renee Diefenderfer | Email and call regarding communication with JPM about letter to claimants  | 11/15/2021 | 0.2   | 225.00 | 45.00    | Legal - Case Administration                  |
| Renee Diefenderfer | Calendar important dates   | 11/15/2021 | 0.2   | 225.00 | 45.00    | Legal - Case Administration                  |
| Renee Diefenderfer | Final letter review with JPM   | 11/15/2021 | 0.3   | 225.00 | 67.50    | Legal - Case Administration                  |
| John Hall          | Review register output and send final claim register to JDC  | 11/15/2021 | 1.2   | 279.00 | 334.80   | Legal - Claims Administration and Objections |
| John Hall          | Review and edit draft claimant letter with JPM (.4) final review (.2)  | 11/15/2021 | 0.6   | 279.00 | 167.40   | Legal - Claims Administration and Objections |
| Josh McGraw        | Call with RLD - claimant Letter  | 11/15/2021 | 0.3   | 225.00 | 67.50    | Legal - Claims Administration and Objections |
| Josh McGraw        | Creation of claimant letter and email to GBW and JBH for review  | 11/15/2021 | 0.3   | 225.00 | 67.50    | Legal - Claims Administration and Objections |
| Josh McGraw        | Review and edit draft claimant letter with JBH   | 11/15/2021 | 0.2   | 225.00 | 45.00    | Legal - Claims Administration and Objections |
| John Hall          | PS analysis per MP request   | 11/16/2021 | 3.9   | 279.00 | 1,088.10 | Financial - Forensic Accounting              |
| John Hall          | Team meeting to review outstanding issues and tasks.   | 11/16/2021 | 0.3   | 279.00 | 83.70    | Legal - Case Administration                  |
| John Hall          | Discuss case and needed info with MP   | 11/16/2021 | 0.4   | 279.00 | 111.60   | Legal - Case Administration                  |
| John Hall          | Team meeting for case next steps   | 11/16/2021 | 0.3   | 279.00 | 83.70    | Legal - Case Administration                  |
| Josh McGraw        | Meeting with GBW, JBH, RLD, MBB to review tasks and next steps   | 11/16/2021 | 0.3   | 225.00 | 67.50    | Legal - Case Administration                  |
| Josh McGraw        | Review email to counsel regarding the PS evidence  | 11/16/2021 | 0.5   | 225.00 | 112.50   | Legal - Case Administration                  |
| Milana Barkhanoy   | Team Meeting with GBW, RLD, JPM, YKW and JBH on tasks and next steps   | 11/16/2021 | 0.3   | 225.00 | 67.50    | Legal - Case Administration                  |
| Milana Barkhanoy   | Reading communication from JBH on claim number correspondence  | 11/16/2021 | 0.1   | 225.00 | 22.50    | Legal - Case Administration                  |
| Milana Barkhanoy   | Reading email communications between JBH and counsel   | 11/16/2021 | 0.3   | 225.00 | 67.50    | Legal - Case Administration                  |
| Renee Diefenderfer | Meeting with the team regarding case next steps  | 11/16/2021 | 0.3   | 225.00 | 67.50    | Legal - Case Administration                  |
| Renee Diefenderfer | Email update to investor   | 11/16/2021 | 0.1   | 225.00 | 22.50    | Legal - Case Administration                  |
| Geoff Winkler      | Team call to discuss case status (.3), email with counsel re timing (.1), call to discuss claims register (.9), review request from RLD, research (.3), review RFA and respond to counsel (.3), review email re assets for sale (.1)   | 11/16/2021 | 2.0   | 315.00 | 630.00   | Legal - Claims Administration and Objections |
| John Hall          | Discuss needed updates to claims register with DZ, making updates per request  | 11/16/2021 | 0.9   | 279.00 | 251.10   | Legal - Claims Administration and Objections |
| Geoff Winkler      | Deposition preparation with counsel (1.0), review letter from investor, respond (.2), review correspondence from third party, discuss with JDC and JBH (.2), work with third party on payment plan (.2), emails with RLD re sales (.1) | 11/17/2021 | 1.7   | 315.00 | 535.50   | Legal - Asset Analysis and Recovery          |
| John Hall          | Review of documents requested by GBW, research and analysis of case documents, update of analysis and update to team   | 11/17/2021 | 2.4   | 279.00 | 669.60   | Legal - Asset Analysis and Recovery          |
| Renee Diefenderfer | Review of email communication sent by GBW regarding third party  | 11/17/2021 | 0.1   | 225.00 | 22.50    | Legal - Asset Analysis and Recovery          |
| Renee Diefenderfer | Assignment of task to MBB for accounting for asset   | 11/17/2021 | 0.2   | 225.00 | 45.00    | Legal - Asset Analysis and Recovery          |
| Renee Diefenderfer | Contact information research for third party, follow up email to GBW for next steps  | 11/17/2021 | 0.2   | 225.00 | 45.00    | Legal - Asset Analysis and Recovery          |
| Renee Diefenderfer | Communication with GBW regarding payment plan for third party  | 11/17/2021 | 0.1   | 225.00 | 22.50    | Legal - Asset Analysis and Recovery          |
| Renee Diefenderfer | Asset review, investigation, and organization  | 11/17/2021 | 1.5   | 225.00 | 337.50   | Legal - Asset Analysis and Recovery          |

**SEC v. Essex Capital Corporation**  
**Summary of Fees of Receiver and Retained Personnel**  
**October 1, 2021 - December 31, 2021**  
**(Sorted in Chronological Order by Activity Category)**

Attachment 1

| Personnel          | Item / Description  | Date       | Hours | Rate   | Amount   | Activity Category                            |
|--------------------|---|------------|-------|--------|----------|--|
| John Hall          | Review investor documents with counsel  | 11/17/2021 | 0.5   | 279.00 | 139.50   | Legal - Case Administration                  |
| John Hall          | Memo to team compiling CE analysis in support of PS   | 11/17/2021 | 1.4   | 279.00 | 390.60   | Legal - Case Administration                  |
| Josh McGraw        | Review documents provided by investor   | 11/17/2021 | 0.2   | 225.00 | 45.00    | Legal - Case Administration                  |
| Josh McGraw        | Review email to counsel regarding proving the PS  | 11/17/2021 | 0.3   | 225.00 | 67.50    | Legal - Case Administration                  |
| Milana Barkhanoy   | Email with new task from RDL  | 11/17/2021 | 0.1   | 225.00 | 22.50    | Legal - Case Administration                  |
| Milana Barkhanoy   | Reading email communications between JBH and counsel  | 11/17/2021 | 0.2   | 225.00 | 45.00    | Legal - Case Administration                  |
| Renee Diefenderfer | Email review from JBH regarding PTP   | 11/17/2021 | 0.2   | 225.00 | 45.00    | Legal - Case Administration                  |
| John Hall          | Call with GBW re upcoming activities in third party litigation  | 11/18/2021 | 0.8   | 279.00 | 223.20   | Legal - Asset Analysis and Recovery          |
| Renee Diefenderfer | Email to third party in attempt to set up a call  | 11/18/2021 | 0.1   | 225.00 | 22.50    | Legal - Asset Analysis and Recovery          |
| Renee Diefenderfer | Document review and storage on asset  | 11/18/2021 | 0.1   | 225.00 | 22.50    | Legal - Asset Analysis and Recovery          |
| Geoff Winkler      | Call with JBH to discuss case (.8), review invoice (.2), emails with JDC re tax invoice (.1), emails with RM re settlement (.1), email to tax accountant re QSF (.1)  | 11/18/2021 | 1.3   | 315.00 | 409.50   | Legal - Case Administration                  |
| John Hall          | Call with DZ JdC and MP with GBW on case updates and working through current task lists   | 11/18/2021 | 1.3   | 279.00 | 362.70   | Legal - Case Administration                  |
| John Hall          | PS analysis of accounts, final document sent to counsel and draft analysis of findings in support of financial status   | 11/18/2021 | 4.3   | 279.00 | 1,199.70 | Legal - Case Administration                  |
| Josh McGraw        | Review JBH email to counsel with supporting documentation   | 11/18/2021 | 0.2   | 225.00 | 45.00    | Legal - Case Administration                  |
| Milana Barkhanoy   | Reading email communications between JBH and counsel  | 11/18/2021 | 0.2   | 225.00 | 45.00    | Legal - Case Administration                  |
| Renee Diefenderfer | Format and upload emails to website for investor communication  | 11/18/2021 | 1.2   | 225.00 | 270.00   | Legal - Case Administration                  |
| Renee Diefenderfer | Meeting prep and updates for call with counsel  | 11/18/2021 | 0.5   | 225.00 | 112.50   | Legal - Case Administration                  |
| Renee Diefenderfer | Communication with GBW regarding updates in preparation for call with counsel   | 11/18/2021 | 0.1   | 225.00 | 22.50    | Legal - Case Administration                  |
| Renee Diefenderfer | Calendar important dates, deadlines   | 11/18/2021 | -     | 225.00 | -        | Legal - Case Administration                  |
| Renee Diefenderfer | Information review from JBH regarding PTP   | 11/18/2021 | 0.1   | 225.00 | 22.50    | Legal - Case Administration                  |
| John Hall          | Affected claimant FAQ call  | 11/18/2021 | 0.2   | 279.00 | 55.80    | Legal - Claims Administration and Objections |
| Geoff Winkler      | Emails with JD re tax questions (.1), gather needed documents for upcoming deposition (.5), prepare for deposition (1.2)  | 11/19/2021 | 1.8   | 315.00 | 567.00   | Legal - Asset Analysis and Recovery          |
| John Hall          | Review Response to RFA and recommend edits  | 11/19/2021 | 0.8   | 279.00 | 223.20   | Legal - Asset Analysis and Recovery          |
| John Hall          | Review counsel draft memo on PS, discuss with GBW   | 11/19/2021 | 0.4   | 279.00 | 111.60   | Legal - Asset Analysis and Recovery          |
| Milana Barkhanoy   | Review investment held by Essex, email from RDL   | 11/19/2021 | 0.1   | 225.00 | 22.50    | Legal - Asset Analysis and Recovery          |
| John Hall          | Review and edit JPM claimant letter   | 11/19/2021 | 0.3   | 279.00 | 83.70    | Legal - Case Administration                  |
| Josh McGraw        | Call with MBB creating mail merge letters and envelopes   | 11/19/2021 | 1.0   | 225.00 | 225.00   | Legal - Case Administration                  |
| Milana Barkhanoy   | Essex claim register - email from JBH   | 11/19/2021 | 0.1   | 225.00 | 22.50    | Legal - Case Administration                  |
| Milana Barkhanoy   | Essex claim register - call with JPM to coordinate writing and sending letters to claimants   | 11/19/2021 | 0.1   | 225.00 | 22.50    | Legal - Case Administration                  |
| Milana Barkhanoy   | Essex claim register - call with JPM creating mail merge letters and envelopes  | 11/19/2021 | 1.0   | 225.00 | 225.00   | Legal - Case Administration                  |
| Milana Barkhanoy   | Essex claim register - preparing and sending communication to claimants with claim ID's   | 11/19/2021 | 2.7   | 225.00 | 607.50   | Legal - Case Administration                  |
| Renee Diefenderfer | Call with investor regarding case update  | 11/19/2021 | 0.2   | 225.00 | 45.00    | Legal - Case Administration                  |
| John Hall          | Final updates to claim system per counsel direction; create final claims register for report and distribute to team, draft claim acknowledgement for letter and provide mailing list for mail merge to team | 11/19/2021 | 2.5   | 279.00 | 697.50   | Legal - Claims Administration and Objections |
| Josh McGraw        | Call with MBB to coordinate writing and sending letters to claimants  | 11/19/2021 | 0.1   | 225.00 | 22.50    | Legal - Claims Administration and Objections |
| Josh McGraw        | Email to JBH to review claimant letter  | 11/19/2021 | 0.1   | 225.00 | 22.50    | Legal - Claims Administration and Objections |
| Geoff Winkler      | Prepare for deposition (3.6)  | 11/21/2021 | 3.6   | 315.00 | 1,134.00 | Legal - Asset Analysis and Recovery          |
| Milana Barkhanoy   | Review investment held by Essex, verify with accounting   | 11/21/2021 | 1.1   | 225.00 | 247.50   | Legal - Case Administration                  |
| Geoff Winkler      | Deposition for GBW v. CVL (8.7), email to counsel re third party litigation (.1)  | 11/22/2021 | 8.8   | 315.00 | 2,772.00 | Legal - Asset Analysis and Recovery          |
| John Hall          | Discuss CVL with GBW and ongoing third party needs  | 11/22/2021 | 0.5   | 279.00 | 139.50   | Legal - Asset Analysis and Recovery          |
| John Hall          | Analysis of compiled tax return fixed asset lists   | 11/22/2021 | 1.4   | 279.00 | 390.60   | Legal - Asset Analysis and Recovery          |



**SEC v. Essex Capital Corporation**  
**Summary of Fees of Receiver and Retained Personnel**  
**October 1, 2021 - December 31, 2021**  
**(Sorted in Chronological Order by Activity Category)**

Attachment 1

| Personnel          | Item / Description  | Date       | Hours | Rate   | Amount | Activity Category                            |
|--------------------|---|------------|-------|--------|--------|--|
| Milana Barkhanoy   | Call with RLD regarding accounting asset task   | 11/22/2021 | 0.3   | 225.00 | 67.50  | Legal - Asset Analysis and Recovery          |
| Renee Diefenderfer | Call with MBB regarding accounting asset task   | 11/22/2021 | 0.3   | 225.00 | 67.50  | Legal - Asset Analysis and Recovery          |
| Ysabel Willits     | Exploring accounting file for mortgage transactions   | 11/22/2021 | 5.8   | 150.00 | 870.00 | Legal - Asset Analysis and Recovery          |
| Ysabel Willits     | Meeting with RLD regarding accounting mortgage transactions   | 11/22/2021 | 0.2   | 150.00 | 30.00  | Legal - Asset Analysis and Recovery          |
| John Hall          | Team meeting with YKW, RLD, JPM, MBB to discuss and coordinate ongoing tasks  | 11/22/2021 | 0.3   | 279.00 | 83.70  | Legal - Case Administration                  |
| John Hall          | Draft three letters and reconciliation schedules for RI; memo to counsel regarding execution and advice re: same.         | 11/22/2021 | 3.4   | 279.00 | 948.60 | Legal - Case Administration                  |
| Josh McGraw        | Meeting with GBW, JBH, RLD, YKW to review tasks and next steps  | 11/22/2021 | 0.3   | 225.00 | 67.50  | Legal - Case Administration                  |
| Josh McGraw        | Call with RLD to discuss email correspondence   | 11/22/2021 | 0.1   | 225.00 | 22.50  | Legal - Case Administration                  |
| Josh McGraw        | Call with MBB to discuss bank accounts  | 11/22/2021 | 0.2   | 225.00 | 45.00  | Legal - Case Administration                  |
| Josh McGraw        | Reviewing due to shareholder documentation provided to counsel from JBH   | 11/22/2021 | 0.3   | 225.00 | 67.50  | Legal - Case Administration                  |
| Milana Barkhanoy   | Call with team regarding next steps   | 11/22/2021 | 0.3   | 225.00 | 67.50  | Legal - Case Administration                  |
| Milana Barkhanoy   | Call with JPM looking for bank statement files  | 11/22/2021 | 0.2   | 225.00 | 45.00  | Legal - Case Administration                  |
| Milana Barkhanoy   | Looking through accounting for evidence of purchase   | 11/22/2021 | 1.1   | 225.00 | 247.50 | Legal - Case Administration                  |
| Milana Barkhanoy   | Review assets, prepping and emailing completed, report to RLD   | 11/22/2021 | 0.1   | 225.00 | 22.50  | Legal - Case Administration                  |
| Renee Diefenderfer | Follow up with YKW on accounting task   | 11/22/2021 | 0.1   | 225.00 | 22.50  | Legal - Case Administration                  |
| Renee Diefenderfer | Call with team regarding next steps   | 11/22/2021 | 0.3   | 225.00 | 67.50  | Legal - Case Administration                  |
| Renee Diefenderfer | Touchbase with JPM on alias email communication   | 11/22/2021 | 0.1   | 225.00 | 22.50  | Legal - Case Administration                  |
| Renee Diefenderfer | Task list updates   | 11/22/2021 | 0.5   | 225.00 | 112.50 | Legal - Case Administration                  |
| Renee Diefenderfer | Meeting with YKW regarding accounting for asset assignment  | 11/22/2021 | 0.2   | 225.00 | 45.00  | Legal - Case Administration                  |
| Ysabel Willits     | Meeting with JPM, RLD, MBB, and JBH regarding our tasks for this upcoming week  | 11/22/2021 | 0.3   | 150.00 | 45.00  | Legal - Case Administration                  |
| Ysabel Willits     | Call with JBH regarding task for exploring accounting file for mortgage transactions                                      | 11/23/2021 | 0.1   | 150.00 | 15.00  | Legal - Asset Analysis and Recovery          |
| Ysabel Willits     | Exploring accounting file for mortgage transactions   | 11/23/2021 | 4.8   | 150.00 | 720.00 | Legal - Asset Analysis and Recovery          |
| Geoff Winkler      | Call with tax attorney re QSF (.4), review records for details needed (.6), call with interested third party (.3)         | 11/23/2021 | 1.3   | 315.00 | 409.50 | Legal - Case Administration                  |
| John Hall          | Discuss PL task with YKW  | 11/23/2021 | 0.1   | 279.00 | 27.90  | Legal - Case Administration                  |
| Ysabel Willits     | Exploring accounting file for mortgage transactions   | 11/24/2021 | 2.0   | 150.00 | 300.00 | Legal - Asset Analysis and Recovery          |
| Geoff Winkler      | Review filings, email with counsel, RLD (.2), review litigation documents, discussion, research, draft memo (.8)          | 11/24/2021 | 1.0   | 315.00 | 315.00 | Legal - Case Administration                  |
| John Hall          | Review RLD asset memo, update accounting with additional data   | 11/24/2021 | 0.5   | 279.00 | 139.50 | Legal - Case Administration                  |
| Renee Diefenderfer | Call with investor regarding case update  | 11/24/2021 | 0.1   | 225.00 | 22.50  | Legal - Case Administration                  |
| Renee Diefenderfer | Updates to website with filings and storage, email to AFS team  | 11/24/2021 | 1.0   | 225.00 | 225.00 | Legal - Case Administration                  |
| Renee Diefenderfer | Review of report and filings  | 11/24/2021 | 0.4   | 225.00 | 90.00  | Legal - Case Administration                  |
| Renee Diefenderfer | Email follow up with investor regarding case update   | 11/24/2021 | 0.1   | 225.00 | 22.50  | Legal - Case Administration                  |
| Renee Diefenderfer | Email to JBH regarding asset analysis and next steps  | 11/24/2021 | 0.1   | 225.00 | 22.50  | Legal - Case Administration                  |
| John Hall          | Analysis of received data from claimant, memo to GBW with recommended treatment   | 11/24/2021 | 2.4   | 279.00 | 669.60 | Legal - Claims Administration and Objections |
| John Hall          | Review and update CVL valuation and BOV documents   | 11/29/2021 | 1.8   | 279.00 | 502.20 | Legal - Asset Analysis and Recovery          |
| Renee Diefenderfer | Updates to third party recovery tracker   | 11/29/2021 | 0.2   | 225.00 | 45.00  | Legal - Asset Analysis and Recovery          |
| Renee Diefenderfer | Email to investor regarding settlement  | 11/29/2021 | 0.1   | 225.00 | 22.50  | Legal - Asset Analysis and Recovery          |
| Renee Diefenderfer | Email with SD regarding asset pricing   | 11/29/2021 | 0.1   | 225.00 | 22.50  | Legal - Asset Analysis and Recovery          |
| Renee Diefenderfer | Asset information review  | 11/29/2021 | 0.6   | 225.00 | 135.00 | Legal - Asset Analysis and Recovery          |
| Geoff Winkler      | Call with team to discuss status (.3), emails with counsel re claims motion (.1), review ROGS and respond to counsel (.3) | 11/29/2021 | 0.7   | 315.00 | 220.50 | Legal - Case Administration                  |
| John Hall          | Team meeting to discuss ongoing tasks   | 11/29/2021 | 0.3   | 279.00 | 83.70  | Legal - Case Administration                  |
| John Hall          | Review AN letter received; scan and email to team   | 11/29/2021 | 0.4   | 279.00 | 111.60 | Legal - Case Administration                  |

**SEC v. Essex Capital Corporation**  
**Summary of Fees of Receiver and Retained Personnel**  
**October 1, 2021 - December 31, 2021**  
**(Sorted in Chronological Order by Activity Category)**

Attachment 1

| Personnel          | Item / Description  | Date       | Hours | Rate   | Amount | Activity Category                            |
|--------------------|---|------------|-------|--------|--------|--|
| Josh McGraw        | Meeting with GBW, JBH, RLD, YKW to review tasks and next steps  | 11/29/2021 | 0.3   | 225.00 | 67.50  | Legal - Case Administration                  |
| Josh McGraw        | Email to investor regarding court documents   | 11/29/2021 | 0.1   | 225.00 | 22.50  | Legal - Case Administration                  |
| Milana Barkhanoy   | Meeting with GBW, RLD, JPM, YKW and JBH regarding upcoming and long term tasks.   | 11/29/2021 | 0.3   | 225.00 | 67.50  | Legal - Case Administration                  |
| Milana Barkhanoy   | Reading communication to and from counsel   | 11/29/2021 | 0.2   | 225.00 | 45.00  | Legal - Case Administration                  |
| Renee Diefenderfer | Voicemail review and check in with team   | 11/29/2021 | 0.1   | 225.00 | 22.50  | Legal - Case Administration                  |
| Renee Diefenderfer | Meeting with team on tasks and next steps   | 11/29/2021 | 0.3   | 225.00 | 67.50  | Legal - Case Administration                  |
| Renee Diefenderfer | Follow up call to investor  | 11/29/2021 | 0.1   | 225.00 | 22.50  | Legal - Case Administration                  |
| Renee Diefenderfer | Review of information sent by JBH and reply from counsel  | 11/29/2021 | 0.1   | 225.00 | 22.50  | Legal - Case Administration                  |
| Renee Diefenderfer | Call with investor  | 11/29/2021 | 0.3   | 225.00 | 67.50  | Legal - Case Administration                  |
| Renee Diefenderfer | Document analysis   | 11/29/2021 | 0.1   | 225.00 | 22.50  | Legal - Case Administration                  |
| Renee Diefenderfer | Review of information sent by JBH regarding PTP   | 11/29/2021 | 0.4   | 225.00 | 90.00  | Legal - Case Administration                  |
| Ysabel Willits     | Meeting with GBW, JPM, RLD, MBB, and JBH regarding our tasks for the upcoming week  | 11/29/2021 | 0.3   | 150.00 | 45.00  | Legal - Case Administration                  |
| Renee Diefenderfer | Email communication with counsel for investor, message with GBW   | 11/30/2021 | 0.2   | 225.00 | 45.00  | Legal - Asset Analysis and Recovery          |
| Renee Diefenderfer | Email and meeting coordination regarding asset  | 11/30/2021 | 0.1   | 225.00 | 22.50  | Legal - Asset Analysis and Recovery          |
| Renee Diefenderfer | Call with YKW regarding asset accounting task   | 11/30/2021 | 0.3   | 225.00 | 67.50  | Legal - Asset Analysis and Recovery          |
| Renee Diefenderfer | Call with JBH regarding assets and accounting task from YKW   | 11/30/2021 | 0.5   | 225.00 | 112.50 | Legal - Asset Analysis and Recovery          |
| Renee Diefenderfer | Asset accounting review   | 11/30/2021 | 1.2   | 225.00 | 270.00 | Legal - Asset Analysis and Recovery          |
| Renee Diefenderfer | Call to discuss quotes for asset shares   | 11/30/2021 | 0.3   | 225.00 | 67.50  | Legal - Asset Analysis and Recovery          |
| Renee Diefenderfer | Asset research and discovery  | 11/30/2021 | 1.2   | 225.00 | 270.00 | Legal - Asset Analysis and Recovery          |
| Ysabel Willits     | Call with RLD regarding asset accounting task   | 11/30/2021 | 0.3   | 150.00 | 45.00  | Legal - Asset Analysis and Recovery          |
| Geoff Winkler      | Email to counsel re filing (.1)   | 11/30/2021 | 0.1   | 315.00 | 31.50  | Legal - Case Administration                  |
| John Hall          | PL refinances and mortgages review with RLD   | 11/30/2021 | 0.5   | 279.00 | 139.50 | Legal - Case Administration                  |
| Josh McGraw        | Reviewing investor email response   | 11/30/2021 | 0.2   | 225.00 | 45.00  | Legal - Case Administration                  |
| Josh McGraw        | Call with RLD to discuss moving documents   | 11/30/2021 | 0.1   | 225.00 | 22.50  | Legal - Case Administration                  |
| Renee Diefenderfer | Call with JPM regarding storage unit move   | 11/30/2021 | 0.1   | 225.00 | 22.50  | Legal - Case Administration                  |
| John Hall          | Affected investor FAQ   | 11/30/2021 | 0.2   | 279.00 | 55.80  | Legal - Claims Administration and Objections |
| John Hall          | Review and response to MK tax issues, discuss needed physical files with GBW and RLD  | 12/1/2021  | 2.4   | 279.00 | 669.60 | Financial - Tax Issues                       |
| John Hall          | Review notice of acquisition documents received, analysis of accounting file to determine residual value, and discuss options with GBW                                    | 12/1/2021  | 1.5   | 279.00 | 418.50 | Legal - Asset Analysis and Recovery          |
| John Hall          | Review YKW analysis and provide questions and feedback for discussion   | 12/1/2021  | 0.5   | 279.00 | 139.50 | Legal - Asset Analysis and Recovery          |
| Ysabel Willits     | Writing up accounting mortgage transaction findings   | 12/1/2021  | 0.5   | 150.00 | 75.00  | Legal - Asset Analysis and Recovery          |
| Geoff Winkler      | Review notice of acquisition, discuss with JBH (.2), review declaration and discuss (.1), review ROGS, email counsel (.2), call with JPM regarding claims processing (.1) | 12/1/2021  | 0.7   | 315.00 | 220.50 | Legal - Case Administration                  |
| John Hall          | Call with JPM to discuss claimant letter and moving storage facility  | 12/1/2021  | 0.1   | 279.00 | 27.90  | Legal - Case Administration                  |
| Josh McGraw        | Call with Investor  | 12/1/2021  | 0.1   | 225.00 | 22.50  | Legal - Case Administration                  |
| Josh McGraw        | Finish preparing letters, print, seal and mail  | 12/1/2021  | 3.0   | 225.00 | 675.00 | Legal - Case Administration                  |
| Josh McGraw        | Prepare letter to claimants   | 12/1/2021  | 0.7   | 225.00 | 157.50 | Legal - Claims Administration and Objections |
| Josh McGraw        | Call with GBW regarding letters to claimants and distribution timetables  | 12/1/2021  | 0.1   | 225.00 | 22.50  | Legal - Claims Administration and Objections |
| Josh McGraw        | Call with JBH to discuss claimant letter and moving storage facility  | 12/1/2021  | 0.1   | 225.00 | 22.50  | Legal - Claims Administration and Objections |
| John Hall          | Preparing tax return filing needs per request from Miller Kaplan  | 12/2/2021  | 1.9   | 279.00 | 530.10 | Financial - Tax Issues                       |
| John Hall          | Producing valuation schedule for counsel re: CVL  | 12/2/2021  | 0.6   | 279.00 | 167.40 | Legal - Asset Analysis and Recovery          |
| Renee Diefenderfer | Send information to counsel to follow up on third party recovery investor   | 12/2/2021  | 0.2   | 225.00 | 45.00  | Legal - Asset Analysis and Recovery          |
| Geoff Winkler      | Call with counsel and JBH and RLD (.7), emails with RLD re asset purchaser (.1), call with RLD and JPM re documents (.1)  | 12/2/2021  | 0.9   | 315.00 | 283.50 | Legal - Case Administration                  |
| John Hall          | Review CVL valuation and provide to counsel   | 12/2/2021  | 0.2   | 279.00 | 55.80  | Legal - Case Administration                  |

**SEC v. Essex Capital Corporation**  
**Summary of Fees of Receiver and Retained Personnel**  
**October 1, 2021 - December 31, 2021**  
**(Sorted in Chronological Order by Activity Category)**

Attachment 1

| Personnel          | Item / Description  | Date      | Hours | Rate   | Amount   | Activity Category                            |
|--------------------|---|-----------|-------|--------|----------|--|
| Josh McGraw        | Call with RLD to discuss documentation and location   | 12/2/2021 | 0.4   | 225.00 | 90.00    | Legal - Case Administration                  |
| Josh McGraw        | Call with GBW & RLD to discuss physical documentation   | 12/2/2021 | 0.1   | 225.00 | 22.50    | Legal - Case Administration                  |
| Josh McGraw        | Call with the interested party  | 12/2/2021 | 0.1   | 225.00 | 22.50    | Legal - Case Administration                  |
| Josh McGraw        | Email to GBW regarding interested party call  | 12/2/2021 | 0.1   | 225.00 | 22.50    | Legal - Case Administration                  |
| Josh McGraw        | Email to RLD regarding storage unit facility access   | 12/2/2021 | 0.1   | 225.00 | 22.50    | Legal - Case Administration                  |
| Renee Diefenderfer | Call with JPM to discuss documentation and location   | 12/2/2021 | 0.4   | 225.00 | 90.00    | Legal - Case Administration                  |
| Renee Diefenderfer | Call with GBW and JPM regarding the location of documentation and next steps  | 12/2/2021 | 0.1   | 225.00 | 22.50    | Legal - Case Administration                  |
| Renee Diefenderfer | Call with counsel to determine case next steps  | 12/2/2021 | 0.7   | 225.00 | 157.50   | Legal - Case Administration                  |
| John Hall          | Pulling brokerage statements and files in support of 2018-2020 tax return preparation, discuss needed items with JC and review physical files   | 12/3/2021 | 3.0   | 279.00 | 837.00   | Financial - Tax Issues                       |
| John Hall          | Work though outstanding tax needs, work with YKW for needed 1099s   | 12/3/2021 | 1.5   | 279.00 | 418.50   | Financial - Tax Issues                       |
| Geoff Winkler      | Emails with counsel re meeting (.1), review urgent document request, research, respond (.3), prepare for mediation (1.4)  | 12/3/2021 | 1.8   | 315.00 | 567.00   | Legal - Asset Analysis and Recovery          |
| John Hall          | Review DC request received and provide needed info to counsel   | 12/3/2021 | 0.6   | 279.00 | 167.40   | Legal - Asset Analysis and Recovery          |
| Josh McGraw        | Call with individual regarding needing to speak with the Receiver   | 12/3/2021 | 0.1   | 225.00 | 22.50    | Legal - Case Administration                  |
| Josh McGraw        | Email communication to GBW regarding message  | 12/3/2021 | 0.1   | 225.00 | 22.50    | Legal - Case Administration                  |
| Josh McGraw        | Logistics cost comparison for moving physical files   | 12/3/2021 | 0.7   | 225.00 | 157.50   | Legal - Case Administration                  |
| Josh McGraw        | Email to RLD to confirm dates and logistics   | 12/3/2021 | 0.1   | 225.00 | 22.50    | Legal - Case Administration                  |
| Ysabel Willits     | Preparing tax preparation task to reach out to firms for 1099's   | 12/3/2021 | 0.5   | 150.00 | 75.00    | Legal - Case Administration                  |
| John Hall          | Pull needed statements and provide to counsel per their request   | 12/4/2021 | 0.4   | 279.00 | 111.60   | Legal - Asset Analysis and Recovery          |
| Geoff Winkler      | Preparation for mediation in GBW v. CVL (5.6)   | 12/6/2021 | 5.6   | 315.00 | 1,764.00 | Legal - Asset Analysis and Recovery          |
| Renee Diefenderfer | Call with third party investor and review of schedule, coordination for follow up with GBW  | 12/6/2021 | 0.4   | 225.00 | 90.00    | Legal - Asset Analysis and Recovery          |
| John Hall          | Team meeting with YKW, MBB, RLD, JPM to discuss ongoing tasks   | 12/6/2021 | 0.2   | 279.00 | 55.80    | Legal - Case Administration                  |
| John Hall          | Discuss and provide order of appointment to YKW   | 12/6/2021 | 0.1   | 279.00 | 27.90    | Legal - Case Administration                  |
| Josh McGraw        | Meeting with GBW, JBH, RLD, YKW to review tasks and next steps  | 12/6/2021 | 0.2   | 225.00 | 45.00    | Legal - Case Administration                  |
| Milana Barkhanoy   | Team meeting with GBW, RLD, JPM, YKW and JBH on tasks and next steps  | 12/6/2021 | 0.2   | 225.00 | 45.00    | Legal - Case Administration                  |
| Milana Barkhanoy   | Email communication from JBH on file organization   | 12/6/2021 | 0.1   | 225.00 | 22.50    | Legal - Case Administration                  |
| Renee Diefenderfer | Meeting with team on tasks and next steps   | 12/6/2021 | 0.2   | 225.00 | 45.00    | Legal - Case Administration                  |
| Renee Diefenderfer | Review of information sent by counsel and communication with team regarding tasks   | 12/6/2021 | 0.4   | 225.00 | 90.00    | Legal - Case Administration                  |
| Renee Diefenderfer | Email communication with investor regarding case updates  | 12/6/2021 | 0.1   | 225.00 | 22.50    | Legal - Case Administration                  |
| Renee Diefenderfer | Update to website with court filings  | 12/6/2021 | 0.3   | 225.00 | 67.50    | Legal - Case Administration                  |
| Ysabel Willits     | Meeting with JPM, RLD, MBB, and JBH regarding tasks and projects  | 12/6/2021 | 0.2   | 150.00 | 30.00    | Legal - Case Administration                  |
| John Hall          | Find 1099 files and provide to accountants; discuss needed 1099s with YKW   | 12/7/2021 | 0.6   | 279.00 | 167.40   | Financial - Tax Issues                       |
| Geoff Winkler      | Mediation in GBW v. CVL (9.1)   | 12/7/2021 | 9.1   | 315.00 | 2,866.50 | Legal - Asset Analysis and Recovery          |
| John Hall          | Review and provide CVL inflows to Essex to GBW, KL JdC  | 12/7/2021 | 0.5   | 279.00 | 139.50   | Legal - Case Administration                  |
| Renee Diefenderfer | Call with investor regarding case updates   | 12/7/2021 | 0.1   | 225.00 | 22.50    | Legal - Case Administration                  |
| Renee Diefenderfer | Communication to GBW regarding investor follow up   | 12/7/2021 | 0.1   | 225.00 | 22.50    | Legal - Case Administration                  |
| Renee Diefenderfer | Review of information on asset sent by counsel  | 12/7/2021 | 0.6   | 225.00 | 135.00   | Legal - Case Administration                  |
| Ysabel Willits     | Reaching out to firms call/email for 1099's for tax preparation   | 12/7/2021 | 1.6   | 150.00 | 240.00   | Legal - Case Administration                  |
| Josh McGraw        | Review email from claimant and confirm documentation  | 12/7/2021 | 0.2   | 225.00 | 45.00    | Legal - Claims Administration and Objections |
| Josh McGraw        | Email to GBW regarding claimant   | 12/7/2021 | 0.1   | 225.00 | 22.50    | Legal - Claims Administration and Objections |
| Ysabel Willits     | Reaching out to firms on call for 1099's for tax preparation  | 12/8/2021 | 0.1   | 150.00 | 15.00    | Legal - Case Administration                  |
| John Hall          | Full review of PW claim per counsel request, memo with analysis and full breakdown of reasoning behind claim as well as certain pieces of information we continue to request in order to get claim to be precise. | 12/8/2021 | 2.0   | 279.00 | 558.00   | Legal - Claims Administration and Objections |
| John Hall          | Producing tax return documents to MK team   | 12/9/2021 | 2.5   | 279.00 | 697.50   | Financial - Tax Issues                       |
| John Hall          | Email to JC on clarifying data needs  | 12/9/2021 | 0.4   | 279.00 | 111.60   | Financial - Tax Issues                       |

**SEC v. Essex Capital Corporation**  
**Summary of Fees of Receiver and Retained Personnel**  
**October 1, 2021 - December 31, 2021**  
**(Sorted in Chronological Order by Activity Category)**

Attachment 1

| Personnel          | Item / Description  | Date       | Hours | Rate   | Amount | Activity Category                            |
|--------------------|---|------------|-------|--------|--------|--|
| Geoff Winkler      | Call with counsel to discuss case (.9), call with JBH and RLD (.3), review email re document production, respond (.1), emails with counsel re claims (.1), email to JB re digital statements (.1) | 12/9/2021  | 1.5   | 315.00 | 472.50 | Legal - Case Administration                  |
| John Hall          | Call with counsel and follow up discussion with GBW and RLD re: outstanding tax and litigation issues   | 12/9/2021  | 1.0   | 279.00 | 279.00 | Legal - Case Administration                  |
| Renee Diefenderfer | Call with counsel to determine case next steps  | 12/9/2021  | 0.9   | 225.00 | 202.50 | Legal - Case Administration                  |
| Renee Diefenderfer | Follow up call with GBW and JBH regarding taxes   | 12/9/2021  | 0.3   | 225.00 | 67.50  | Legal - Case Administration                  |
| Geoff Winkler      | Call with team to discuss (.2), process wires (.2), review statements, email to JBH (.1)  | 12/10/2021 | 0.5   | 315.00 | 157.50 | Legal - Case Administration                  |
| John Hall          | Case discussion with full team  | 12/10/2021 | 0.2   | 279.00 | 55.80  | Legal - Case Administration                  |
| Josh McGraw        | Meeting with GBW, JBH, RLD, YKW to review tasks and next steps  | 12/10/2021 | 0.2   | 225.00 | 45.00  | Legal - Case Administration                  |
| Renee Diefenderfer | Meeting with team on tasks and next steps   | 12/10/2021 | 0.2   | 225.00 | 45.00  | Legal - Case Administration                  |
| Renee Diefenderfer | Call with investor regarding case updates   | 12/10/2021 | 0.2   | 225.00 | 45.00  | Legal - Case Administration                  |
| Ysabel Willits     | Meeting with GBW, MBB, JPM, RLD, and JBH regarding ongoing and upcoming tasks   | 12/10/2021 | 0.2   | 150.00 | 30.00  | Legal - Case Administration                  |
| Ysabel Willits     | Reaching out to firms call/email for 1099's for tax preparation   | 12/10/2021 | 0.1   | 150.00 | 15.00  | Legal - Case Administration                  |
| John Hall          | Discuss CVL GL review task with GBW, scoping, and instructing JPM to identify correct alternate workflows   | 12/13/2021 | 0.5   | 279.00 | 139.50 | Legal - Asset Analysis and Recovery          |
| Renee Diefenderfer | Call with YKW about asset accounting task   | 12/13/2021 | 0.1   | 225.00 | 22.50  | Legal - Asset Analysis and Recovery          |
| Renee Diefenderfer | Asset review, investigation, communication, and organization  | 12/13/2021 | 0.9   | 225.00 | 202.50 | Legal - Asset Analysis and Recovery          |
| Ysabel Willits     | Quick check in with RLD regarding asset accounting task   | 12/13/2021 | 0.1   | 150.00 | 15.00  | Legal - Asset Analysis and Recovery          |
| Ysabel Willits     | Validating transactions to create payment schedule of asset investment for valuation  | 12/13/2021 | 2.4   | 150.00 | 360.00 | Legal - Asset Analysis and Recovery          |
| Ysabel Willits     | Creating payment schedule of asset investment for valuation   | 12/13/2021 | -     | 150.00 | -      | Legal - Asset Analysis and Recovery          |
| Ysabel Willits     | Writing up findings for asset investment valuation  | 12/13/2021 | 0.5   | 150.00 | 75.00  | Legal - Asset Analysis and Recovery          |
| Geoff Winkler      | Email from counsel re document production (.1)  | 12/13/2021 | 0.1   | 315.00 | 31.50  | Legal - Case Administration                  |
| Josh McGraw        | Email to JBH regarding preparation for financials and timetable for valuation   | 12/13/2021 | 0.1   | 225.00 | 22.50  | Legal - Case Administration                  |
| Josh McGraw        | Email to RLD regarding investor communication and claims process timelines  | 12/13/2021 | 0.1   | 225.00 | 22.50  | Legal - Case Administration                  |
| Josh McGraw        | Call to investor requesting an update   | 12/13/2021 | 0.1   | 225.00 | 22.50  | Legal - Case Administration                  |
| Josh McGraw        | Email to JBH regarding investor calls about the claim register  | 12/13/2021 | 0.1   | 225.00 | 22.50  | Legal - Case Administration                  |
| Josh McGraw        | Research on conversion of financials and QuickBooks for valuation   | 12/13/2021 | 1.1   | 225.00 | 247.50 | Legal - Case Administration                  |
| Josh McGraw        | Call with LL regarding update on the case   | 12/13/2021 | 0.1   | 225.00 | 22.50  | Legal - Case Administration                  |
| Josh McGraw        | Email software company to determine if their software will assist with conversion of financials into QB   | 12/13/2021 | 0.1   | 225.00 | 22.50  | Legal - Case Administration                  |
| Renee Diefenderfer | Get important dates from counsel, coordination and communication with team  | 12/13/2021 | 0.5   | 225.00 | 112.50 | Legal - Case Administration                  |
| Renee Diefenderfer | Updates to JPM on case for follow up for investor   | 12/13/2021 | 0.1   | 225.00 | 22.50  | Legal - Case Administration                  |
| Renee Diefenderfer | Call with attorney representing investor for an update, follow up email   | 12/13/2021 | 0.2   | 225.00 | 45.00  | Legal - Case Administration                  |
| Renee Diefenderfer | Emails with investor/attorney regarding claim letter  | 12/13/2021 | 0.1   | 225.00 | 22.50  | Legal - Case Administration                  |
| Ysabel Willits     | Getting familiar with asset investment portfolio for valuation  | 12/13/2021 | 0.3   | 150.00 | 45.00  | Legal - Case Administration                  |
| Josh McGraw        | Email RLD for requested claimant letter   | 12/13/2021 | 0.1   | 225.00 | 22.50  | Legal - Claims Administration and Objections |
| Geoff Winkler      | Emails with counsel re GL request (.1)  | 12/14/2021 | 0.1   | 315.00 | 31.50  | Legal - Case Administration                  |
| Josh McGraw        | Conversation with software developer to discuss viability of their software for conversion of financials  | 12/14/2021 | 0.1   | 225.00 | 22.50  | Legal - Case Administration                  |
| John Hall          | Analysis and documentation of position on PW claim  | 12/14/2021 | 2.3   | 279.00 | 641.70 | Legal - Claims Administration and Objections |
| Renee Diefenderfer | Review of asset analysis sent by YKW  | 12/15/2021 | 0.2   | 225.00 | 45.00  | Legal - Asset Analysis and Recovery          |
| John Hall          | Review and cross check PW claim info for DZ   | 12/15/2021 | 1.1   | 279.00 | 306.90 | Legal - Claims Administration and Objections |
| Josh McGraw        | Call with claimant regarding mail notification  | 12/15/2021 | 0.3   | 225.00 | 67.50  | Legal - Claims Administration and Objections |
| John Hall          | Review UBS 1099 for taxes   | 12/16/2021 | 0.2   | 279.00 | 55.80  | Financial - Tax Issues                       |
| John Hall          | Review and analysis of CVL general ledger   | 12/16/2021 | 3.4   | 279.00 | 948.60 | Legal - Asset Analysis and Recovery          |

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**Summary of Fees of Receiver and Retained Personnel**  
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**(Sorted in Chronological Order by Activity Category)**

Attachment 1

| Personnel          | Item / Description   | Date       | Hours | Rate   | Amount   | Activity Category                            |
|--------------------|--|------------|-------|--------|----------|--|
| Renee Diefenderfer | Coordination with third party recovery effort on arranging settlement, documentation.  | 12/16/2021 | 0.2   | 225.00 | 45.00    | Legal - Asset Analysis and Recovery          |
| Geoff Winkler      | Review documents received, email with JBH (.3), emails with counsel re missing documents, process (.1)                                     | 12/16/2021 | 0.4   | 315.00 | 126.00   | Legal - Case Administration                  |
| Renee Diefenderfer | Review of communication sent by counsel regarding third party and next steps, preparation and coordination for meeting                     | 12/16/2021 | 0.2   | 225.00 | 45.00    | Legal - Case Administration                  |
| Renee Diefenderfer | Call with investor regarding case updates  | 12/16/2021 | 0.1   | 225.00 | 22.50    | Legal - Case Administration                  |
| Ysabel Willits     | Follow up correspondence with firm for 1099 data   | 12/16/2021 | 0.6   | 150.00 | 90.00    | Legal - Case Administration                  |
| John Hall          | Review inquiry from DZ and provide additional info on DZ claim   | 12/16/2021 | 0.3   | 279.00 | 83.70    | Legal - Claims Administration and Objections |
| Josh McGraw        | Review financials provided and determine best route for valuation  | 12/17/2021 | 0.2   | 225.00 | 45.00    | Financial - Accounting/Auditing              |
| John Hall          | Review and compile request of info from MP   | 12/17/2021 | 0.4   | 279.00 | 111.60   | Legal - Asset Analysis and Recovery          |
| John Hall          | Instructions to CVL for QB data pull   | 12/17/2021 | 0.5   | 279.00 | 139.50   | Legal - Asset Analysis and Recovery          |
| Geoff Winkler      | Work with JBH and JDC re acquisition of documents needed (.1)  | 12/17/2021 | 0.1   | 315.00 | 31.50    | Legal - Case Administration                  |
| John Hall          | Review and analysis of additional PW documents   | 12/17/2021 | 0.5   | 279.00 | 139.50   | Legal - Claims Administration and Objections |
| Josh McGraw        | Research routes to upload data into QB   | 12/18/2021 | 0.1   | 225.00 | 22.50    | Financial - Accounting/Auditing              |
| John Hall          | Conversation with JPM regarding completing financials and valuation  | 12/20/2021 | 0.2   | 279.00 | 55.80    | Financial - Accounting/Auditing              |
| John Hall          | Analysis of CVL financials with JPM  | 12/20/2021 | 0.8   | 279.00 | 223.20   | Financial - Accounting/Auditing              |
| Josh McGraw        | Conversation with JBH regarding completing financials and valuation  | 12/20/2021 | 0.2   | 225.00 | 45.00    | Financial - Accounting/Auditing              |
| Josh McGraw        | Analysis of CVL financials with JBH  | 12/20/2021 | 0.8   | 225.00 | 180.00   | Financial - Forensic Accounting              |
| John Hall          | Standardization and analysis of CVL GL   | 12/20/2021 | 4.6   | 279.00 | 1,283.40 | Legal - Asset Analysis and Recovery          |
| Geoff Winkler      | Call with counsel and team to discuss outstanding litigation (1.4), call with team (.2), research and provide entity list for counsel (.2) | 12/20/2021 | 1.8   | 315.00 | 567.00   | Legal - Case Administration                  |
| John Hall          | Case discussion of ongoing tasks with team   | 12/20/2021 | 0.2   | 279.00 | 55.80    | Legal - Case Administration                  |
| John Hall          | Meeting with counsel o discuss ongoing operations (1.1) follow up with GBW and RLD for task discussion (.3)                                | 12/20/2021 | 1.4   | 279.00 | 390.60   | Legal - Case Administration                  |
| Josh McGraw        | Meeting with GBW, JBH, RLD, YKW to review tasks and next steps   | 12/20/2021 | 0.2   | 225.00 | 45.00    | Legal - Case Administration                  |
| Josh McGraw        | Analysis of size of vehicle needed for moving physical files   | 12/20/2021 | 0.2   | 225.00 | 45.00    | Legal - Case Administration                  |
| Josh McGraw        | Logistics call with RLD to review physical files and move locations  | 12/20/2021 | 0.1   | 225.00 | 22.50    | Legal - Case Administration                  |
| Josh McGraw        | Email to JBH requesting financial documentation for analysis   | 12/20/2021 | 0.1   | 225.00 | 22.50    | Legal - Case Administration                  |
| Milana Barkhanoy   | Team Meeting with GBW, RLD, JPM, YKW and JBH on tasks and next steps   | 12/20/2021 | 0.2   | 225.00 | 45.00    | Legal - Case Administration                  |
| Renee Diefenderfer | Call with counsel and AFS team to determine case next steps  | 12/20/2021 | 1.1   | 225.00 | 247.50   | Legal - Case Administration                  |
| Renee Diefenderfer | Meeting with team on tasks and next steps  | 12/20/2021 | 0.2   | 225.00 | 45.00    | Legal - Case Administration                  |
| Renee Diefenderfer | Call with GBW and JBH regarding discovery tasks and next steps   | 12/20/2021 | 0.3   | 225.00 | 67.50    | Legal - Case Administration                  |
| Renee Diefenderfer | Call with JPM to discuss plan for files and transportation   | 12/20/2021 | 0.1   | 225.00 | 22.50    | Legal - Case Administration                  |
| Ysabel Willits     | Meeting with GBW, RLD, MBB, JPM, and JBH regarding tasks to complete before the end of the year  | 12/20/2021 | 0.2   | 150.00 | 30.00    | Legal - Case Administration                  |
| Josh McGraw        | Review CVL financials  | 12/21/2021 | 0.3   | 225.00 | 67.50    | Financial - Forensic Accounting              |
| Geoff Winkler      | Review email re settlement (.1), email with RLD (.2), prepare documents for discovery request (1.2)  | 12/21/2021 | 1.5   | 315.00 | 472.50   | Legal - Asset Analysis and Recovery          |
| John Hall          | Review and analyze DZ email on PW claim, discuss with GBW  | 12/21/2021 | 0.4   | 279.00 | 111.60   | Legal - Claims Administration and Objections |
| Josh McGraw        | Review CVL financials  | 12/22/2021 | 0.7   | 225.00 | 157.50   | Financial - Forensic Accounting              |
| Josh McGraw        | Review CVL financials and prepare valuation  | 12/22/2021 | 4.3   | 225.00 | 967.50   | Financial - Forensic Accounting              |
| Renee Diefenderfer | Letter review and edits for DFS task from JBH  | 12/22/2021 | 1.0   | 225.00 | 225.00   | Financial - Tax Issues                       |
| John Hall          | File review and discussion with team on CVL and sale and history   | 12/22/2021 | 0.4   | 279.00 | 111.60   | Legal - Asset Analysis and Recovery          |
| John Hall          | Search NE shares transfer to PW and findings to counsel  | 12/22/2021 | 0.4   | 279.00 | 111.60   | Legal - Asset Analysis and Recovery          |
| John Hall          | Review all entities known, list sent to MP for inclusion in reporting  | 12/22/2021 | 2.0   | 279.00 | 558.00   | Legal - Case Administration                  |
| John Hall          | Research BW and send recommendation to counsel   | 12/22/2021 | 0.3   | 279.00 | 83.70    | Legal - Case Administration                  |
| Josh McGraw        | Review documents identified by JBH and sent to counsel   | 12/22/2021 | 0.3   | 225.00 | 67.50    | Legal - Case Administration                  |
| Renee Diefenderfer | Update to website with court filings   | 12/22/2021 | 0.2   | 225.00 | 45.00    | Legal - Case Administration                  |

**SEC v. Essex Capital Corporation**  
**Summary of Fees of Receiver and Retained Personnel**  
**October 1, 2021 - December 31, 2021**  
**(Sorted in Chronological Order by Activity Category)**

Attachment 1

| Personnel          | Item / Description  | Date       | Hours | Rate   | Amount   | Activity Category                            |
|--------------------|---|------------|-------|--------|----------|--|
| Renee Diefenderfer | Review and analysis of files and communication to team on next steps  | 12/22/2021 | 0.1   | 225.00 | 22.50    | Legal - Case Administration                  |
| Josh McGraw        | Email to RLD regarding follow-up with claimant  | 12/22/2021 | 0.1   | 225.00 | 22.50    | Legal - Claims Administration and Objections |
| John Hall          | Review CVL balance sheet with JPM   | 12/23/2021 | 0.3   | 279.00 | 83.70    | Financial - Accounting/Auditing              |
| Josh McGraw        | Review CVL financials and prepare valuation   | 12/23/2021 | 4.8   | 225.00 | 1,080.00 | Financial - Forensic Accounting              |
| Josh McGraw        | Review CVL balance sheet with JBH   | 12/23/2021 | 0.3   | 225.00 | 67.50    | Financial - Forensic Accounting              |
| John Hall          | Pull and review subject reports for asset location  | 12/23/2021 | 2.0   | 279.00 | 558.00   | Legal - Asset Analysis and Recovery          |
| Milana Barkhanoy   | Preparing claim number email communication for International Claimant   | 12/27/2021 | 0.1   | 225.00 | 22.50    | Legal - Case Administration                  |
| John Hall          | Call with JPM to review audit log of financials   | 12/28/2021 | 0.7   | 279.00 | 195.30   | Financial - Accounting/Auditing              |
| Josh McGraw        | Review CVL GJ entries   | 12/28/2021 | 2.0   | 225.00 | 450.00   | Financial - Forensic Accounting              |
| Josh McGraw        | Call with JBH to review audit log of financials   | 12/28/2021 | 0.7   | 225.00 | 157.50   | Financial - Forensic Accounting              |
| Josh McGraw        | Review CVL audit log and adjusted entries   | 12/28/2021 | 1.5   | 225.00 | 337.50   | Financial - Forensic Accounting              |
| Josh McGraw        | Create valuation of CVL   | 12/28/2021 | 0.5   | 225.00 | 112.50   | Financial - Forensic Accounting              |
|                    | Team call to discuss case status (.4), process AP (.3), review QB file, work with parties re password (.3), email with counsel re documents (.1), review storage for discovery documents (2.2), call with YKW for asset recovery (.2) | 12/28/2021 | 3.5   | 315.00 | 1,102.50 | Legal - Asset Analysis and Recovery          |
| Geoff Winkler      | Communication to JBH regarding assets for file review in addition to verification   | 12/28/2021 | 0.1   | 225.00 | 22.50    | Legal - Asset Analysis and Recovery          |
| Renee Diefenderfer | Correspondence with bank for asset recovery information   | 12/28/2021 | 0.2   | 150.00 | 30.00    | Legal - Asset Analysis and Recovery          |
| Ysabel Willits     | Call with GBW and bank for asset recovery information   | 12/28/2021 | 0.2   | 150.00 | 30.00    | Legal - Asset Analysis and Recovery          |
| John Hall          | Retrieve and analyze CVL QB file  | 12/28/2021 | 1.1   | 279.00 | 306.90   | Legal - Case Administration                  |
| John Hall          | Weekly team meeting to discuss coordination of ongoing tasks  | 12/28/2021 | 0.4   | 279.00 | 111.60   | Legal - Case Administration                  |
| Josh McGraw        | Meeting with GBW, JBH, RLD, YKW to review tasks and next steps  | 12/28/2021 | 0.4   | 225.00 | 90.00    | Legal - Case Administration                  |
| Milana Barkhanoy   | Team meeting with GBW, RLD, JPM, YKW and JBH on tasks and next steps  | 12/28/2021 | 0.4   | 225.00 | 90.00    | Legal - Case Administration                  |
| Milana Barkhanoy   | Communication with RLD regarding sending claims info to claimant  | 12/28/2021 | 0.1   | 225.00 | 22.50    | Legal - Case Administration                  |
| Milana Barkhanoy   | Communication from RLD regarding claims letters/confirmation sent/received.   | 12/28/2021 | 0.1   | 225.00 | 22.50    | Legal - Case Administration                  |
| Milana Barkhanoy   | Emailing claim number communication for International Claimant  | 12/28/2021 | 0.1   | 225.00 | 22.50    | Legal - Case Administration                  |
| Milana Barkhanoy   | Emailing update to RLD regarding sending claims info to international claimant  | 12/28/2021 | 0.1   | 225.00 | 22.50    | Legal - Case Administration                  |
| Milana Barkhanoy   | Email from JBH on RI TLO Report   | 12/28/2021 | 0.1   | 225.00 | 22.50    | Legal - Case Administration                  |
| Renee Diefenderfer | Analysis of information sent by counsel   | 12/28/2021 | 0.2   | 225.00 | 45.00    | Legal - Case Administration                  |
| Renee Diefenderfer | Meeting with team on tasks and next steps   | 12/28/2021 | 0.4   | 225.00 | 90.00    | Legal - Case Administration                  |
| Renee Diefenderfer | Communication with MBB regarding sending claims info to claimant  | 12/28/2021 | 0.1   | 225.00 | 22.50    | Legal - Case Administration                  |
|                    | Communication with MBB and JPM regarding claims letters/confirmation sent/received.   | 12/28/2021 | 0.1   | 225.00 | 22.50    | Legal - Case Administration                  |
| Renee Diefenderfer | Update to website with court filings  | 12/28/2021 | 0.2   | 225.00 | 45.00    | Legal - Case Administration                  |
|                    | Meeting with GBW, RLD, MBB, JPM, and JBH regarding tasks to complete before the end of the year   | 12/28/2021 | 0.4   | 150.00 | 60.00    | Legal - Case Administration                  |
| Ysabel Willits     | Review audit log for CVL financials   | 12/29/2021 | 1.5   | 225.00 | 337.50   | Financial - Forensic Accounting              |
| Josh McGraw        | Create data table for audit log   | 12/29/2021 | 2.0   | 225.00 | 450.00   | Financial - Forensic Accounting              |
| Josh McGraw        | Email to RLD regarding counsel confirmation on received claims letters  | 12/29/2021 | 0.1   | 225.00 | 22.50    | Legal - Case Administration                  |
| Milana Barkhanoy   | Reading email from RLD requesting communication copies for counsel  | 12/29/2021 | 0.1   | 225.00 | 22.50    | Legal - Case Administration                  |
| Milana Barkhanoy   | Reading update from JPM on claim number communication   | 12/29/2021 | 0.1   | 225.00 | 22.50    | Legal - Case Administration                  |
| Renee Diefenderfer | Confirmation on claims numbers being sent and communication with counsel  | 12/29/2021 | 0.1   | 225.00 | 22.50    | Legal - Case Administration                  |
| Renee Diefenderfer | Compilation and communication with team regarding items requested by counsel  | 12/29/2021 | 2.0   | 225.00 | 450.00   | Legal - Case Administration                  |
| Josh McGraw        | Emails to claimant regarding claim number   | 12/29/2021 | 0.2   | 225.00 | 45.00    | Legal - Claims Administration and Objections |
| Josh McGraw        | Update and finalize draft valuation   | 12/30/2021 | 1.5   | 225.00 | 337.50   | Financial - Forensic Accounting              |
| Josh McGraw        | Create summary of analyses and valuation  | 12/30/2021 | 0.6   | 225.00 | 135.00   | Financial - Forensic Accounting              |
| Josh McGraw        | Email to JBH with summary of CVL valuation  | 12/30/2021 | 0.1   | 225.00 | 22.50    | Financial - Forensic Accounting              |
| Renee Diefenderfer | Asset report review   | 12/30/2021 | 0.2   | 225.00 | 45.00    | Legal - Asset Analysis and Recovery          |
| Ysabel Willits     | Correspondence with bank for asset recovery information   | 12/30/2021 | 0.2   | 150.00 | 30.00    | Legal - Asset Analysis and Recovery          |

**SEC v. Essex Capital Corporation**  
**Summary of Fees of Receiver and Retained Personnel**  
**October 1, 2021 - December 31, 2021**  
**(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>                     |
|--------------------|--|-------------|--------------|-------------|---------------------|--|
| Renee Diefenderfer | Review of information from counsel, updates to tasks, communication with GBW via email, and determination of next steps to move case forward | 12/30/2021  | 2.4          | 225.00      | 540.00              | Legal - Case Administration                  |
| Renee Diefenderfer | Updates and preparation for team meeting regarding tasks and next steps to move forward  | 12/30/2021  | 0.2          | 225.00      | 45.00               | Legal - Case Administration                  |
| Renee Diefenderfer | Review of background information from reports  | 12/30/2021  | 1.2          | 225.00      | 270.00              | Legal - Case Administration                  |
| John Hall          | Review ML production materials and respond to claim value request  | 12/31/2021  | 1.2          | 279.00      | 334.80              | Legal - Claims Administration and Objections |
| <b>Totals</b>      |  |             | <b>362.6</b> |             | <b>\$ 93,801.00</b> |  |

**SEC v. Essex Capital Corporation**  
**Summary of Fees of Receiver and Retained Personnel**  
**October 1, 2021 - December 31, 2021**  
**(Sorted in Chronological Order by Activity Category)**

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                   | Geoff Winkler      | AFS         | 3.8          | 315.00      | \$ 1,197.00         |                   |
| Financial - Accounting/Auditing                   | John Hall          | AFS         | 2.0          | 279.00      | \$ 558.00           |                   |
| Financial - Accounting/Auditing                   | Renee Diefenderfer | AFS         | 0.0          | 225.00      | \$ -                |                   |
| Financial - Accounting/Auditing                   | Josh McGraw        | AFS         | 0.5          | 225.00      | \$ 112.50           |                   |
| Financial - Accounting/Auditing                   | Milana Barkhanoy   | AFS         | 2.0          | 225.00      | \$ 450.00           |                   |
| Financial - Accounting/Auditing                   | Ysabel Willits     | AFS         | 0.0          | 125.00      | \$ -                |                   |
|   |                    |             | <u>8.3</u>   |             | <u>\$ 2,317.50</u>  |                   |
| <b>Financial - Forensic Accounting</b>            | <b>Personnel</b>   | <b>Firm</b> | <b>Hours</b> | <b>Rate</b> | <b>Amount</b>       |                   |
| Financial - Forensic Accounting                   | Geoff Winkler      | AFS         | 0.0          | 315.00      | \$ -                |                   |
| Financial - Forensic Accounting                   | John Hall          | AFS         | 18.4         | 279.00      | \$ 5,133.60         |                   |
| Financial - Forensic Accounting                   | Renee Diefenderfer | AFS         | 0.0          | 225.00      | \$ -                |                   |
| Financial - Forensic Accounting                   | Josh McGraw        | AFS         | 22.9         | 225.00      | \$ 5,152.50         |                   |
| Financial - Forensic Accounting                   | Milana Barkhanoy   | AFS         | 0.0          | 225.00      | \$ -                |                   |
| Financial - Forensic Accounting                   | Ysabel Willits     | AFS         | 0.0          | 125.00      | \$ -                |                   |
|   |                    |             | <u>41.3</u>  |             | <u>\$ 10,286.10</u> |                   |
| <b>Financial - Tax Issues</b>                     | <b>Personnel</b>   | <b>Firm</b> | <b>Hours</b> | <b>Rate</b> | <b>Amount</b>       |                   |
| Financial - Tax Issues                            | Geoff Winkler      | AFS         | 0.0          | 315.00      | \$ -                |                   |
| Financial - Tax Issues                            | John Hall          | AFS         | 15.7         | 279.00      | \$ 4,380.30         |                   |
| Financial - Tax Issues                            | Renee Diefenderfer | AFS         | 1.0          | 225.00      | \$ 225.00           |                   |
| Financial - Tax Issues                            | Josh McGraw        | AFS         | 0.0          | 225.00      | \$ -                |                   |
| Financial - Tax Issues                            | Milana Barkhanoy   | AFS         | 1.2          | 225.00      | \$ 270.00           |                   |
| Financial - Tax Issues                            | Ysabel Willits     | AFS         | 0.0          | 125.00      | \$ -                |                   |
|   |                    |             | <u>17.9</u>  |             | <u>\$ 4,875.30</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               | Geoff Winkler      | AFS         | 44.0         | 315.00      | \$ 13,860.00        |                   |
| Legal - Asset Analysis and Recovery               | John Hall          | AFS         | 27.2         | 279.00      | \$ 7,588.80         |                   |
| Legal - Asset Analysis and Recovery               | Renee Diefenderfer | AFS         | 26.5         | 225.00      | \$ 5,962.50         |                   |
| Legal - Asset Analysis and Recovery               | Josh McGraw        | AFS         | 1.5          | 225.00      | \$ 337.50           |                   |
| Legal - Asset Analysis and Recovery               | Milana Barkhanoy   | AFS         | 0.4          | 225.00      | \$ 90.00            |                   |
| Legal - Asset Analysis and Recovery               | Ysabel Willits     | AFS         | 21.2         | 150.00      | \$ 3,180.00         |                   |
|   |                    |             | <u>120.8</u> |             | <u>\$ 31,018.80</u> |                   |
| <b>Legal - Case Administration</b>                | <b>Personnel</b>   | <b>Firm</b> | <b>Hours</b> | <b>Rate</b> | <b>Amount</b>       |                   |
| Legal - Case Administration                       | Geoff Winkler      | AFS         | 29.1         | 315.00      | \$ 9,166.50         |                   |
| Legal - Case Administration                       | John Hall          | AFS         | 36.0         | 279.00      | \$ 10,044.00        |                   |
| Legal - Case Administration                       | Renee Diefenderfer | AFS         | 34.7         | 225.00      | \$ 7,807.50         |                   |
| Legal - Case Administration                       | Josh McGraw        | AFS         | 17.7         | 225.00      | \$ 3,982.50         |                   |
| Legal - Case Administration                       | Milana Barkhanoy   | AFS         | 13.2         | 225.00      | \$ 2,970.00         |                   |
| Legal - Case Administration                       | Ysabel Willits     | AFS         | 6.0          | 150.00      | \$ 900.00           |                   |
|   |                    |             | <u>136.7</u> |             | <u>\$ 34,870.50</u> |                   |



**SEC v. Essex Capital Corporation**  
**Summary of Fees of Receiver and Retained Personnel**  
**October 1, 2021 - December 31, 2021**  
**(Sorted in Chronological Order by Activity Category)**

Attachment 1

| Personnel   | Item / Description | Date        | Hours        | Rate        | Amount              | Activity Category |
|---|--------------------|-------------|--------------|-------------|---------------------|-------------------|
| <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        | Geoff Winkler      | AFS         | 3.8          | 315.00      | \$ 1,197.00         |                   |
| Legal - Claims Administration and Objections        | John Hall          | AFS         | 30.2         | 279.00      | \$ 8,425.80         |                   |
| Legal - Claims Administration and Objections        | Renee Diefenderfer | AFS         | 0.0          | 225.00      | \$ -                |                   |
| Legal - Claims Administration and Objections        | Josh McGraw        | AFS         | 3.6          | 225.00      | \$ 810.00           |                   |
| Legal - Claims Administration and Objections        | Milana Barkhanoy   | AFS         | 0.0          | 225.00      | \$ -                |                   |
| Legal - Claims Administration and Objections        | Ysabel Willits     | AFS         | 0.0          | 150.00      | \$ -                |                   |
|   |                    |             | <u>37.6</u>  |             | <u>\$ 10,432.80</u> |                   |

| <b>Overall Summary</b> |                    |      |              |        |                     |
|------------------------|--------------------|------|--------------|--------|---------------------|
| Totals                 | Personnel          | Firm | Hours        | Rate   | Amount              |
|                        | Geoff Winkler      | AFS  | 80.7         | 315.00 | \$ 25,420.50        |
|                        | John Hall          | AFS  | 129.5        | 279.00 | \$ 36,130.50        |
|                        | Renee Diefenderfer | AFS  | 62.2         | 225.00 | \$ 13,995.00        |
|                        | Josh McGraw        | AFS  | 46.2         | 225.00 | \$ 10,395.00        |
|                        | Milana Barkhanoy   | AFS  | 16.8         | 225.00 | \$ 3,780.00         |
|                        | Ysabel Willits     | AFS  | 27.2         | 150.00 | \$ 4,080.00         |
|                        |                    |      | <u>362.6</u> |        | <u>\$ 93,801.00</u> |
|                        | <b>TOTAL FEES</b>  |      | <b>362.6</b> |        | <b>\$ 93,801.00</b> |

**SEC v. Essex Capital Corporation**  
**Summary of Expenses of Receiver and Retained Personnel**  
**October 1, 2021 - December 31, 2021**

**Attachment 2**

| <b>Incurred By</b> | <b>Payee</b>          | <b>Item / Description</b> | <b>Date Incurred</b> | <b>Amount</b> | <b>Category</b>          |
|--------------------|-----------------------|---------------------------|----------------------|---------------|--------------------------|
| Geoff Winkler      | PACER                 |                           | 10/18/21             | 13.40         | Internet/Online Fees     |
| Geoff Winkler      | Alaska Airlines       |                           | 11/08/21             | 216.80        | Airfare                  |
| Geoff Winkler      | Alaska Airlines       |                           | 11/05/21             | 696.81        | Airfare                  |
| Renee Diefenderfer | USPS                  |                           | 11/12/21             | 22.54         | Courier/Shipping/Freight |
| Geoff Winkler      | Westin                |                           | 11/21/21             | 11.00         | Individual Meals         |
| Geoff Winkler      | Uber Eats             |                           | 11/21/21             | 42.36         | Individual Meals         |
| Geoff Winkler      | Target                |                           | 11/21/21             | 60.21         | Miscellaneous            |
| Geoff Winkler      | Uber                  |                           | 11/21/21             | 106.23        | Taxi                     |
| Geoff Winkler      | Westin                |                           | 11/22/21             | 7.84          | Individual Meals         |
| Geoff Winkler      | Uber Eats             |                           | 11/22/21             | 35.08         | Individual Meals         |
| Geoff Winkler      | Uber                  |                           | 11/23/21             | 63.07         | Taxi                     |
| Geoff Winkler      | Port of Portland      |                           | 11/23/21             | 51.00         | Parking                  |
| Geoff Winkler      | Westin                |                           | 11/23/21             | 383.22        | Hotel                    |
| Geoff Winkler      | Uber                  |                           | 12/06/21             | 91.33         | Taxi                     |
| Geoff Winkler      | Mo's Seafood          |                           | 12/07/21             | 11.38         | Individual Meals         |
| Geoff Winkler      | Point the Way Café    |                           | 12/07/21             | 24.83         | Individual Meals         |
| Geoff Winkler      | Uber Eats             |                           | 12/07/21             | 29.92         | Individual Meals         |
| Geoff Winkler      | Uber                  |                           | 12/07/21             | 44.81         | Taxi                     |
| Geoff Winkler      | Courtyard by Marriott |                           | 12/07/21             | 238.60        | Hotel                    |
| <b>Total</b>       |                       |                           |                      | <b>\$</b>     | <b><u>2,150.43</u></b>   |

|                                 |   |                 |              |   |                 |
|---------------------------------|---|-----------------|--------------|---|-----------------|
| <b>Airfare</b>                  | - | 913.61          | -            | - | 913.61          |
| <b>Courier/Shipping/Freight</b> | - | -               | 22.54        | - | 22.54           |
| <b>Hotel</b>                    | - | 621.82          | -            | - | 621.82          |
| <b>Individual Meals</b>         | - | 162.41          | -            | - | 162.41          |
| <b>Internet/Online Fees</b>     | - | 13.40           | -            | - | 13.40           |
| <b>Miscellaneous</b>            | - | 60.21           | -            | - | 60.21           |
| <b>Parking</b>                  | - | 51.00           | -            | - | 51.00           |
| <b>Taxi</b>                     | - | 305.44          | -            | - | 305.44          |
| <b>Total</b>                    | - | <b>2,127.89</b> | <b>22.54</b> | - | <b>2,150.43</b> |

**SEC v. Essex Capital Corporation  
Receivership Estate Balance Sheet  
October 1, 2021 - December 31, 2021**

**Attachment 3**

**Assets:**

|  |                 |
|--|-----------------|
| Cash   | \$ 4,185,938.54 |
| Loan Receivable                                  | \$ -            |
| Marketable Securities                            | \$ -            |
| Net Lease Receivables                            | \$ -            |
| Real Property <sup>1</sup>                       | \$ -            |
| Equipment Residual Value <sup>1</sup>            | \$ -            |
| Private Equity Investments <sup>1</sup>          | \$ 2,555,746.29 |
| Existing Litigation <sup>2,3</sup>               | \$ -            |
| Third Party Litigation <sup>2,3</sup>            | \$ 6,375,000.00 |
| Professional Liability Litigation <sup>2,3</sup> | \$ 50,000.00    |

**Total Assets** \$ 13,166,684.83

**Liabilities:**

|                                  |             |
|----------------------------------|-------------|
| State/Federal Taxes <sup>4</sup> | \$ -        |
| Property Taxes <sup>4</sup>      | \$ -        |
| <b>Total Liabilities</b>         | <u>\$ -</u> |

**Claims:1**

|                     |                         |
|---------------------|-------------------------|
| Investors           | \$ 39,780,165.49        |
| Creditors           | \$ 114,603.92           |
| <b>Total Claims</b> | <u>\$ 39,894,769.41</u> |

**Total Liabilities plus Claims** \$ 39,894,769.41

- 
1. Estimated value that is subject to further revision.
  2. Probability of successful recovery unknown.
  3. Value based on discounted present value and is under evaluation.
  4. There is no known tax liability, but the Receiver is reviewing.

**SEC v. Essex Capital Corporation  
Receiver's Cash Receipts and Disbursements  
October 1, 2021 - December 31, 2021**

**Attachment 4**

|  |                               |
|--|-------------------------------|
| <b>Beginning Balance of Cash in Receivership Estate on October 1, 2021</b> | <b>\$ 4,522,135.41</b>        |
| <b>Deposits:</b>   | <b>\$ 66,492.75</b>           |
| <b>Payments:</b>   | <b>\$ (402,689.62)</b>        |
| <b>Ending Balance of Cash in Receivership Estate on December 31, 2021</b>  | <b><u>\$ 4,185,938.54</u></b> |

**EXHIBIT 2**

}

01/28/22 16:45:47 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: 01/11/22

Matter Name: General Receivership

Proforma Number: 1135905

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> |    |       |
|-------------------|--------------|---|----------------------|--------------|-------------|------------|---------------|---------------|----|-------|
| 10/07/21          | 8593227      | Prepare for and attend teleconference with Receiver's office regarding case administration; follow-up with counsel regarding same (0.7).                                  | Del Castillo, Joshua | 0.70         | 450.45      | 450.45     | WO            | HD            | TR | _____ |
| 10/11/21          | 8596518      | Review correspondence and attend to case administration matters (0.3).  | Del Castillo, Joshua | 0.30         | 193.05      | 643.50     | WO            | HD            | TR | _____ |
| 10/14/21          | 8600102      | Prepare for and attend weekly call with Receiver's office regarding case administration matters (0.8); review dockets and attention to case administration matters (0.5). | Del Castillo, Joshua | 1.30         | 836.55      | 1,480.05   | WO            | HD            | TR | _____ |
| 10/18/21          | 8602449      | Assemble and review notes regarding case administration matters and confer with counsel regarding same (0.5).   | Del Castillo, Joshua | 0.50         | 321.75      | 1,801.80   | WO            | HD            | TR | _____ |
| 10/28/21          | 8614373      | Prepare for and attend teleconference with Receiver's office regarding pending case administration matters (0.9).   | Del Castillo, Joshua | 0.90         | 579.15      | 2,380.95   | WO            | HD            | TR | _____ |
| 11/05/21          | 8625656      | Attention to case administration matters and confer with counsel regarding same (0.5).  | Del Castillo, Joshua | 0.50         | 321.75      | 2,702.70   | WO            | HD            | TR | _____ |

01/28/22 16:45:47 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 |    |       |
|------------|---------|---|----------------------|-------|----------|----------|--------|--------|----|-------|
| 11/08/21   | 8627138 | Review notes and emails and confer extensively with counsel regarding case administration matters (1.7).  | Del Castillo, Joshua | 1.70  | 1,093.95 | 3,796.65 | WO     | HD     | TR | _____ |
| 11/09/21   | 8628696 | Extensive meeting with counsel to address and identify critical outstanding case administration matters (1.0).  | Del Castillo, Joshua | 1.00  | 643.50   | 4,440.15 | WO     | HD     | TR | _____ |
| 11/11/21   | 8631653 | Prepare for and attend team call regarding case administration matters (1.0).   | Del Castillo, Joshua | 1.00  | 643.50   | 5,083.65 | WO     | HD     | TR | _____ |
| 11/15/21   | 8634090 | Review and respond to correspondence from counsel and attention to case administration matters (0.5).   | Del Castillo, Joshua | 0.50  | 321.75   | 5,405.40 | WO     | HD     | TR | _____ |
| 11/18/21   | 8638542 | Teleconferences and emails with counsel regarding case administration (0.9) prepare for and attend team meeting (1.2); teleconference with counsel regarding tax inquiry and review notes regarding same (0.5). | Del Castillo, Joshua | 2.60  | 1,673.10 | 7,078.50 | WO     | HD     | TR | _____ |
| 11/18/21   | 8643973 | Virtually meet with client and counsel regarding outstanding case administration matters  | Pham, Matt D.        | 1.20  | 496.80   | 7,575.30 | WO     | HD     | TR | _____ |
| 11/24/21   | 8644499 | Review case administration deadlines and attention to pending matters (0.6).  | Del Castillo, Joshua | 0.60  | 386.10   | 7,961.40 | WO     | HD     | TR | _____ |
| 12/02/21   | 8653998 | Prepare for and attend team call with Receiver regarding case administration issues (0.7).  | Del Castillo, Joshua | 0.70  | 450.45   | 8,411.85 | WO     | HD     | TR | _____ |
| 12/06/21   | 8656592 | Prepare emails to counsel regarding outstanding case administration matters   | Del Castillo, Joshua | 0.50  | 321.75   | 8,733.60 | WO     | HD     | TR | _____ |

01/28/22 16:45:47 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 (0.5).   | Timekeeper           | Hours | Fees     | Sum       | Circle | Action |    |       |
|------------|---------|--|----------------------|-------|----------|-----------|--------|--------|----|-------|
| 12/08/21   | 8659031 | Emails and teleconferences with counsel regarding pending case administration matters and attention to same (0.8).                               | Del Castillo, Joshua | 0.80  | 514.80   | 9,248.40  | WO     | HD     | TR | _____ |
| 12/09/21   | 8660407 | Prepare for and attend team meeting with Receiver's office (1.0).  | Del Castillo, Joshua | 1.00  | 643.50   | 9,891.90  | WO     | HD     | TR | _____ |
| 12/09/21   | 8670713 | Virtually attend weekly meeting with client regarding case status and updates  | Pham, Matt D.        | 0.30  | 124.20   | 10,016.10 | WO     | HD     | TR | _____ |
| 12/13/21   | 8663237 | Review documents and correspondence and attention to case administration issues (0.5).   | Del Castillo, Joshua | 0.50  | 321.75   | 10,337.85 | WO     | HD     | TR | _____ |
| 12/16/21   | 8667091 | Emails and teleconference regarding case administration matters (0.4).   | Del Castillo, Joshua | 0.40  | 257.40   | 10,595.25 | WO     | HD     | TR | _____ |
| 12/20/21   | 8670121 | Attention to case administration matters and confer with counsel regarding same (0.5); prepare for and attend call with Receiver's office (1.1). | Del Castillo, Joshua | 1.60  | 1,029.60 | 11,624.85 | WO     | HD     | TR | _____ |
| 12/20/21   | 8681941 | Virtually attend weekly meeting regarding status of receivership and outstanding tasks   | Pham, Matt D.        | 0.60  | 248.40   | 11,873.25 | WO     | HD     | TR | _____ |
| 12/21/21   | 8681989 | Draft email to client regarding list of receivership entities  | Pham, Matt D.        | 0.20  | 82.80    | 11,956.05 | WO     | HD     | TR | _____ |
| 12/27/21   | 8674937 | Attention to and emails regarding case administration matters (0.5).   | Del Castillo, Joshua | 0.50  | 321.75   | 12,277.80 | WO     | HD     | TR | _____ |

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

01/28/22 16:45:47 PROFORMA STATEMENT FOR MATTER 378224.00002 (Winkler, Geoff/Receiver for Essex Capita) (General Receivership)

| Trans Date | Index   | Type   | Quantity | Amt      | WO | HD | TR | _____ |
|------------|---------|--|----------|----------|----|----|----|-------|
| 10/01/21   | 2736339 | EDISC – CS Disco, Inc. - Monthly Hosting for October 2021  | 0.00     | 3,068.17 | WO | HD | TR | _____ |
| 10/01/21   | 2746661 | DCSRCH – Document Search - - PACER - 7/21 -9/21 Usage  | 0.00     | 0.30     | WO | HD | TR | _____ |
| 10/01/21   | 2746694 | DCSRCH – Document Search - - PACER - 7/21 -9/21 Usage  | 0.00     | 0.30     | WO | HD | TR | _____ |
| 10/01/21   | 2746700 | DCSRCH – Document Search - - PACER - 7/21 -9/21 Usage  | 0.00     | 0.50     | WO | HD | TR | _____ |
| 10/01/21   | 2746706 | DCSRCH – Document Search - - PACER - 7/21 -9/21 Usage  | 0.00     | 0.30     | WO | HD | TR | _____ |
| 10/01/21   | 2746732 | DCSRCH – Document Search - - PACER - 7/21 -9/21 Usage  | 0.00     | 1.70     | WO | HD | TR | _____ |
| 10/01/21   | 2746737 | DCSRCH – Document Search - - PACER - 7/21 -9/21 Usage  | 0.00     | 2.30     | WO | HD | TR | _____ |
| 10/01/21   | 2746760 | DCSRCH – Document Search - - PACER - 7/21 -9/21 Usage  | 0.00     | 0.10     | WO | HD | TR | _____ |
| 10/05/21   | 2737902 | MSNGR – Nationwide Legal, LLC - SIMONA PENG, Deliver Courtesy  | 0.00     | 29.40    | WO | HD | TR | _____ |
| 10/29/21   | 2738743 | BW – Duplication - Black & White Copies  | 4.00     | 0.76     | WO | HD | TR | _____ |
| 10/29/21   | 2738744 | COLOR – Duplication - Color Copies   | 4.00     | 1.00     | WO | HD | TR | _____ |
| 11/01/21   | 2741045 | EDISC – CS Disco, Inc. - Monthly Hosting for November 2021   | 0.00     | 2,382.94 | WO | HD | TR | _____ |
| 11/12/21   | 2742157 | POS – Nationwide Legal, LLC - ACME Hospitality LLC, Subpoena to Produce Documents, Information, or Objects or to Permit Inspection of Premises in a Civil Action | 0.00     | 221.00   | WO | HD | TR | _____ |
| 11/15/21   | 2740810 | BW – Duplication - Black & White Copies  | 3.00     | 0.57     | WO | HD | TR | _____ |
| 11/15/21   | 2740811 | COLOR – Duplication - Color Copies   | 25.00    | 6.25     | WO | HD | TR | _____ |
| 12/01/21   | 2745473 | EDISC – CS Disco, Inc. - Monthly Hosting for December 2021   | 0.00     | 2,592.14 | WO | HD | TR | _____ |

**Proforma Summary**



01/28/22 16:45:47 PROFORMA STATEMENT FOR MATTER 378224.00002 (Winkler, Geoff/Receiver for Essex Capita) (General Receivership)

**Timekeeper**

| <b>Number</b>       | <b>Timekeeper</b>    | <b>Hours</b> | <b>Rate</b> | <b>Amounts</b> |
|---------------------|----------------------|--------------|-------------|----------------|
| 001842              | Del Castillo, Joshua | 17.60        | 643.50      | 11,325.60      |
| 002510              | Pham, Matt D.        | 2.30         | 414.00      | 952.20         |
|                     |                      | 19.90        |             | \$12,277.80    |
| Subtotal Fees       |                      |              |             | \$12,277.80    |
| Discount            |                      |              |             | 0.00           |
| Total Fees          |                      |              |             | 12,277.80      |
| Total Disbursements |                      |              |             | 8,307.73       |

**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 6/30/2022: 10% off standard rates (automatic)

**Account Summary – As Of 01/28/22**

|                     | Fiscal YTD       |                  |                  | Calendar YTD |           |          | LTD        |            |               |
|---------------------|------------------|------------------|------------------|--------------|-----------|----------|------------|------------|---------------|
|                     | Total            | Fees             | Disb.            | Total        | Fees      | Disb.    | Total      | Fees       | Disbursements |
| Worked              | 41,791.50        | 41,791.50        | 0.00             | 3,867.75     | 3,867.75  | 0.00     | 225,876.93 | 178,715.47 | 47,161.46     |
| Unbilled Adj        | 0.00             | 0.00             | 0.00             | 0.00         | 0.00      | 0.00     | 3,430.56   | 3,310.87   | 119.69        |
| Billed              | 42,217.55        | 30,273.30        | 11,944.25        | 26,193.94    | 19,733.85 | 6,460.09 | 142,181.10 | 142,181.10 | 38,853.73     |
| Collected           | 42,217.55        | 30,273.30        | 11,944.25        | 26,193.94    | 19,733.85 | 6,460.09 | 181,034.83 | 142,181.10 | 38,853.73     |
| 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>34,511.86</b> | <b>22,057.65</b> | <b>12,454.21</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>      |                  |                  |                  |              |           |          |            |            |               |

01/28/22 16:45:47 PROFORMA STATEMENT FOR MATTER 378224.00002 (Winkler, Geoff/Receiver for Essex Capita) (General Receivership)

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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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01/28/22 16:45:49 PROFORMA STATEMENT FOR MATTER 378224.00003 (Winkler, Geoff/Receiver for Essex Capita) (Asset Recovery & Management)

**Preliminary Billing Form**

Billing Atty: 001842 - Del Castillo,  
Joshua

Matter #: 378224.00003

Client Name: Winkler, Geoff/Receiver for Essex Capita

Date of Last Billing: 01/11/22

Matter Name: Asset Recovery & Management

Proforma Number: 1135905

Client/Matter Joint Group # 378224-1

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

| Trans Date | Index   | Description of Service Rendered   | Timekeeper           | Hours | Fees     | Sum      | Circle | Action |    |       |
|------------|---------|---|----------------------|-------|----------|----------|--------|--------|----|-------|
| 10/01/21   | 8589600 | Emails, teleconferences, and legal analysis in connection with prospective settlements of disgorgement and asset recovery actions (2.8); review accounting materials in connection with same (0.5); review correspondence from Receiver's office and confer regarding amended FACs (1.0). | Del Castillo, Joshua | 4.30  | 2,767.05 | 2,767.05 | WO     | HD     | TR | _____ |
| 10/04/21   | 8589765 | Review and respond to email regarding disgorgement efforts; confer with counsel and Receiver's office regarding same (0.9); attention to proposed revisions to disgorgement complaints and confer with counsel regarding same (0.5).  | Del Castillo, Joshua | 1.40  | 900.90   | 3,667.95 | WO     | HD     | TR | _____ |
| 10/04/21   | 8591770 | Work on the issues and evaluate the records/legal issues as to the statute of limitations, follow-up with counsel as to strategy.   | Zaro, David          | 1.10  | 920.70   | 4,588.65 | WO     | HD     | TR | _____ |
| 10/05/21   | 8590916 | Emails and teleconferences regarding pending and contemplated disgorgement matters; review documents in connection  | Del Castillo, Joshua | 1.30  | 836.55   | 5,425.20 | WO     | HD     | TR | _____ |

01/28/22 16:45:49 PROFORMA STATEMENT FOR MATTER 378224.00003 (Winkler, Geoff/Receiver for Essex Capita) (Asset Recovery & Management)

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

| Trans Date | Index   | Description of Service Rendered with asset recovery status (1.3).   | Timekeeper           | Hours | Fees     | Sum       | Circle | Action |    |       |
|------------|---------|---|----------------------|-------|----------|-----------|--------|--------|----|-------|
| 10/05/21   | 8592117 | Several emails/conferences with counsel as to the strategy/coordination of fraudulent conveyance claims.  | Zaro, David          | 0.40  | 334.80   | 5,760.00  | WO     | HD     | TR | _____ |
| 10/05/21   | 8609780 | Review deadlines this week on calendar and update tracking document (.5).   | O'Neal, Mikayla      | 0.50  | 157.50   | 5,917.50  | WO     | HD     | TR | _____ |
| 10/06/21   | 8591802 | Emails and teleconferences with counsel regarding pending disgorgement matters (0.9); complete legal analysis regarding prospective additional claims (1.8).  | Del Castillo, Joshua | 2.70  | 1,737.45 | 7,654.95  | WO     | HD     | TR | _____ |
| 10/06/21   | 8594348 | Several emails with counsel, Ms. Itkin related to Davis settlement (.3). Work on the documents and research to support the Ponzi scheme prove-up (.6). Emails/call with the Receiver counsel to address Ponzi prove-up (.3.)  | Zaro, David          | 1.20  | 1,004.40 | 8,659.35  | WO     | HD     | TR | _____ |
| 10/07/21   | 8602729 | Several calls with counsel, prepare for team meeting related to the fraudulent conveyance, follow-up regarding same (.4). Attend team meeting concerning the Receiver's claw back actions and coordination of discovery (.4). | Zaro, David          | 0.80  | 669.60   | 9,328.95  | WO     | HD     | TR | _____ |
| 10/08/21   | 8594220 | Attention to Ponzi analysis materials and prepare outline for prove-up memorandum; review documents in connection with same (1.9).  | Del Castillo, Joshua | 1.90  | 1,222.65 | 10,551.60 | WO     | HD     | TR | _____ |
| 10/11/21   | 8596097 | Review correspondence from client and confer extensively with counsel regarding Ponzi prove-up; legal analysis in connection  | Del Castillo, Joshua | 1.10  | 707.85   | 11,259.45 | WO     | HD     | TR | _____ |

01/28/22 16:45:49 PROFORMA STATEMENT FOR MATTER 378224.00003 (Winkler, Geoff/Receiver for Essex Capita) (Asset Recovery & Management)

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

| Trans Date | Index   | Description of Service Rendered   | Timekeeper           | Hours | Fees     | Sum       | Circle | Action |    |       |
|------------|---------|---|----------------------|-------|----------|-----------|--------|--------|----|-------|
|            |         | with same (1.1).  |                      |       |          |           |        |        |    |       |
| 10/13/21   | 8598812 | Review documents and legal analysis in connection with pending disgorgement matters (1.3).  | Del Castillo, Joshua | 1.30  | 836.55   | 12,096.00 | WO     | HD     | TR | _____ |
| 10/18/21   | 8604215 | Assess emails and meeting with counsel to address the outstanding claw back claims, progress toward settlement.   | Zaro, David          | 0.40  | 334.80   | 12,430.80 | WO     | HD     | TR | _____ |
| 10/19/21   | 8606833 | Evaluate the issues related to the revance shares and recovery from third party investors, call with counsel.   | Zaro, David          | 0.40  | 334.80   | 12,765.60 | WO     | HD     | TR | _____ |
| 10/20/21   | 8605525 | Review correspondence from Receiver's office regarding discovery of additional profiting investors, conduct associated legal analysis, and prepare recommendations regarding same (1.5); analysis of prospective Penny Lane claim (0.8); confer with counsel regarding pending disgorgement cases and litigation and discovery strategy for same (1.1). | Del Castillo, Joshua | 3.40  | 2,187.90 | 14,953.50 | WO     | HD     | TR | _____ |
| 10/20/21   | 8605720 | meeting to discuss research regarding fraudulent claim arbitration in Colorado; briefly began research  | Rosenblum, Rachel    | 0.50  | 101.25   | 15,054.75 | WO     | HD     | TR | _____ |
| 10/21/21   | 8606757 | Additional legal analysis in connection with Ponzi prove-up memo (.7).  | Del Castillo, Joshua | 0.70  | 450.45   | 15,505.20 | WO     | HD     | TR | _____ |
| 10/22/21   | 8607914 | Review calendar and docket for each Winkler case (.4); update case tracking document (.1).  | O'Neal, Mikayla      | 0.50  | 157.50   | 15,662.70 | WO     | HD     | TR | _____ |

01/28/22 16:45:49 PROFORMA STATEMENT FOR MATTER 378224.00003 (Winkler, Geoff/Receiver for Essex Capita) (Asset Recovery & Management)

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

| Trans Date | Index   | Description of Service Rendered   | Timekeeper           | Hours | Fees     | Sum       | Circle | Action |    |       |
|------------|---------|---|----------------------|-------|----------|-----------|--------|--------|----|-------|
| 10/25/21   | 8610223 | Review voicemail and follow-up with Receiver regarding pending charitable disgorgement settlement (0.2).  | Del Castillo, Joshua | 0.20  | 128.70   | 15,791.40 | WO     | HD     | TR | _____ |
| 10/25/21   | 8612612 | Analysis of the pending claw back cases, research as to foundation for Ponzi-scheme and evaluate global strategy, advice as to discovery and possible motion for summary judgment.                                  | Zaro, David          | 1.10  | 920.70   | 16,712.10 | WO     | HD     | TR | _____ |
| 10/26/21   | 8611293 | Attention to pending disgorgement settlement matters and correspondence regarding same (0.5).   | Del Castillo, Joshua | 0.50  | 321.75   | 17,033.85 | WO     | HD     | TR | _____ |
| 10/27/21   | 8613944 | Confer extensively with counsel regarding pending disgorgement and asset recovery matters, and outstanding tasks regarding same (1.0).  | Del Castillo, Joshua | 1.00  | 643.50   | 17,677.35 | WO     | HD     | TR | _____ |
| 10/28/21   | 8614335 | Review and revise demand letter (0.5); emails regarding Bishop Garcia Diego settlement (0.1)  | Del Castillo, Joshua | 0.60  | 386.10   | 18,063.45 | WO     | HD     | TR | _____ |
| 10/28/21   | 8615698 | Work with counsel on the Ponzi Scheme research/analysis, advice as to the accounting back-up (.7). Attend the meeting with the Receiver team to address the claw back actions, follow-up thereon with counsel (.8). | Zaro, David          | 1.50  | 1,255.50 | 19,318.95 | WO     | HD     | TR | _____ |
| 10/29/21   | 8616465 | Review and respond to emails regarding pending asset disgorgement matters (0.5); legal analysis in connection with pre-trial preparation on disgorgement cases and emails to counsel regarding same (2.5).          | Del Castillo, Joshua | 3.00  | 1,930.50 | 21,249.45 | WO     | HD     | TR | _____ |

01/28/22 16:45:49 PROFORMA STATEMENT FOR MATTER 378224.00003 (Winkler, Geoff/Receiver for Essex Capita) (Asset Recovery & Management)

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

| Trans Date | Index   | Description of Service Rendered   | Timekeeper           | Hours | Fees   | Sum       | Circle | Action |    |       |
|------------|---------|---|----------------------|-------|--------|-----------|--------|--------|----|-------|
| 10/31/21   | 8618552 | Emails with counsel and review documents regarding pending asset recovery efforts (0.5).  | Del Castillo, Joshua | 0.50  | 321.75 | 21,571.20 | WO     | HD     | TR | _____ |
| 11/04/21   | 8628596 | Evaluate the status of the claw back litigation/ponzi analysis (.4). Conference call with Receiver team, address status and overall strategy, follow-up (.7). | Zaro, David          | 1.10  | 920.70 | 22,491.90 | WO     | HD     | TR | _____ |
| 11/05/21   | 8630065 | Prepare for/attend conference with counsel for defendants as to settlement of cases/ponzi issues, follow-up with counsel.                                     | Zaro, David          | 0.60  | 502.20 | 22,994.10 | WO     | HD     | TR | _____ |
| 11/08/21   | 8627302 | Review and respond to correspondence from Receiver's office regarding Iannelli "Due From Shareholder" debt and anticipated demands regarding same (0.2).      | Del Castillo, Joshua | 0.20  | 128.70 | 23,122.80 | WO     | HD     | TR | _____ |
| 11/08/21   | 8630093 | Work on the evaluation of legal issues shared among pending cases, meeting with Receiver counsel and follow-up.   | Zaro, David          | 0.90  | 753.30 | 23,876.10 | WO     | HD     | TR | _____ |
| 11/09/21   | 8628699 | Review and respond to correspondence regarding Bishop Garcia Diego settlement and payment matters (0.5).  | Del Castillo, Joshua | 0.50  | 321.75 | 24,197.85 | WO     | HD     | TR | _____ |
| 11/10/21   | 8630086 | Confer with counsel regarding general settlement and asset recovery analysis and review materials in connection with same (1.2).                              | Del Castillo, Joshua | 1.20  | 772.20 | 24,970.05 | WO     | HD     | TR | _____ |
| 11/11/21   | 8631423 | Emails and teleconferences with counsel regarding pending asset recovery efforts and prospective settlements of same (1.0).                                   | Del Castillo, Joshua | 1.00  | 643.50 | 25,613.55 | WO     | HD     | TR | _____ |

01/28/22 16:45:49 PROFORMA STATEMENT FOR MATTER 378224.00003 (Winkler, Geoff/Receiver for Essex Capita) (Asset Recovery & Management)

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

| Trans Date | Index   | Description of Service Rendered   | Timekeeper           | Hours | Fees     | Sum       | Circle | Action |    |       |
|------------|---------|---|----------------------|-------|----------|-----------|--------|--------|----|-------|
| 11/11/21   | 8632758 | Several emails and conferences with counsel related to the claw back research/financial fraud as a foundation for claims, and cost-benefit of alternative strategies to prove-up fraudulent conveyance claims (.4). Attend team meeting with Receiver and counsel as to the asset recovery/claw back issues and follow-up (.7). | Zaro, David          | 1.10  | 920.70   | 26,534.25 | WO     | HD     | TR | _____ |
| 11/12/21   | 8634068 | Review analysis provided by Receiver's office in connection with Ponzi prove-up and confer with counsel regarding same (1.5).   | Del Castillo, Joshua | 1.50  | 965.25   | 27,499.50 | WO     | HD     | TR | _____ |
| 11/12/21   | 8635581 | Analysis/research as to the Ponzi scheme and foundation for fraudulent conveyance, Receiver/counsel accounting analysis and then confer with counsel as to the next steps in analysis/discovery.  | Zaro, David          | 0.70  | 585.90   | 28,085.40 | WO     | HD     | TR | _____ |
| 11/13/21   | 8634083 | Review documents and attention to asset recovery matters (2.0).   | Del Castillo, Joshua | 2.00  | 1,287.00 | 29,372.40 | WO     | HD     | TR | _____ |
| 11/16/21   | 8636407 | Review first amended complaint and begin to draft Reyner Rule 26 Report (.5); review first amended complaint and begin to draft McCloskey Rule 26 Report (.5).  | O'Neal, Mikayla      | 1.00  | 315.00   | 29,687.40 | WO     | HD     | TR | _____ |
| 11/17/21   | 8637001 | Emails and teleconferences regarding outstanding asset recovery matters (0.7); review and prepare detailed notes regarding Ponzi prove-up memo and associated materials (1.7).  | Del Castillo, Joshua | 2.40  | 1,544.40 | 31,231.80 | WO     | HD     | TR | _____ |



01/28/22 16:45:49 PROFORMA STATEMENT FOR MATTER 378224.00003 (Winkler, Geoff/Receiver for Essex Capita) (Asset Recovery & Management)

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

| Trans Date | Index   | Description of Service Rendered  | Timekeeper           | Hours | Fees     | Sum       | Circle | Action |    |       |
|------------|---------|--|----------------------|-------|----------|-----------|--------|--------|----|-------|
| 11/17/21   | 8639458 | Research/analysis of the issues concerning Receivers Ponzi analysis, follow-up to assess Receiver accounting and analysis/email communications among Receiver, Mr. Hall and counsel related to the foregoing issue.  | Zaro, David          | 1.80  | 1,506.60 | 32,738.40 | WO     | HD     | TR | _____ |
| 11/18/21   | 8638543 | Prepare for and teleconference regarding Ponzi prove-up (1.0); review follow-up demands to profiting investors (0.5).  | Del Castillo, Joshua | 1.50  | 965.25   | 33,703.65 | WO     | HD     | TR | _____ |
| 11/18/21   | 8640004 | Research/analysis and work on the Ponzi scheme, fraudulent conveyance analysis as applied to all of the actions (1.1). Meeting/research as to the fraudulent conveyance as applied to all of the pending cases and follow-up (.5). Attend client meeting with counsel and clients/Mr. Winkler and Mr. Hall as to the receivership/fraudulent conveyances, CVL, taxes and follow-up regarding same (1.0). | Zaro, David          | 2.60  | 2,176.20 | 35,879.85 | WO     | HD     | TR | _____ |
| 11/22/21   | 8644006 | Review and analyze relevant documents relating to Bill Reyner for preparation of new complaint against Reyner and related parties  | Pham, Matt D.        | 1.30  | 538.20   | 36,418.05 | WO     | HD     | TR | _____ |
| 11/22/21   | 8644008 | Begin drafting complaint against Reyner and related parties for breach of fiduciary duty and declaratory relief  | Pham, Matt D.        | 1.10  | 455.40   | 36,873.45 | WO     | HD     | TR | _____ |
| 11/22/21   | 8644012 | Review and analyze additional relevant documents relating to Bill Reyner for preparation of complaint for breach of fiduciary duty and declaratory relief  | Pham, Matt D.        | 0.90  | 372.60   | 37,246.05 | WO     | HD     | TR | _____ |

01/28/22 16:45:49 PROFORMA STATEMENT FOR MATTER 378224.00003 (Winkler, Geoff/Receiver for Essex Capita) (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> |    |       |
|-------------------|--------------|--|----------------------|--------------|-------------|------------|---------------|---------------|----|-------|
| 11/22/21          | 8644015      | Review and analyze transcript of Bill Reyner deposition for inclusion of relevant facts in new complaint against Reyner  | Pham, Matt D.        | 0.60         | 248.40      | 37,494.45  | WO            | HD            | TR | _____ |
| 11/23/21          | 8644022      | Continue drafting new complaint against Reyner for breach of fiduciary duty and declaratory relief - allegations regarding jurisdiction, parties, general allegations          | Pham, Matt D.        | 1.60         | 662.40      | 38,156.85  | WO            | HD            | TR | _____ |
| 11/23/21          | 8644024      | Continue drafting new complaint against Reyner for breach of fiduciary duty and declaratory relief - general allegations regarding formation of and early events regarding CVL | Pham, Matt D.        | 1.70         | 703.80      | 38,860.65  | WO            | HD            | TR | _____ |
| 11/23/21          | 8644030      | Continue drafting Reyner complaint - allegations regarding Lumber Yard acquisition and related notes   | Pham, Matt D.        | 1.00         | 414.00      | 39,274.65  | WO            | HD            | TR | _____ |
| 11/23/21          | 8644032      | Continue drafting Reyner complaint - allegations supporting breach of fiduciary duty claim (0.9); allegations supporting declaratory relief (0.7)                              | Pham, Matt D.        | 1.60         | 662.40      | 39,937.05  | WO            | HD            | TR | _____ |
| 11/23/21          | 8646350      | Evaluate the Receiver email and draft letters, assess issues (.3). Follow-up on the claims against Mr. Iannelli, recovery analysis, tax issues and strategy (.6).              | Zaro, David          | 0.90         | 753.30      | 40,690.35  | WO            | HD            | TR | _____ |
| 11/24/21          | 8649435      | Continue drafting new complaint against Reyner - allegations regarding Essex note and two inventory notes  | Pham, Matt D.        | 1.00         | 414.00      | 41,104.35  | WO            | HD            | TR | _____ |
| 11/28/21          | 8645386      | Review disgorgement litigation dockets and attention to case administration matters (1.5).   | Del Castillo, Joshua | 1.50         | 965.25      | 42,069.60  | WO            | HD            | TR | _____ |

01/28/22 16:45:49 PROFORMA STATEMENT FOR MATTER 378224.00003 (Winkler, Geoff/Receiver for Essex Capita) (Asset Recovery & Management)

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

| Trans Date | Index   | Description of Service Rendered   | Timekeeper           | Hours | Fees     | Sum       | Circle | Action |    |       |
|------------|---------|---|----------------------|-------|----------|-----------|--------|--------|----|-------|
| 11/28/21   | 8649448 | Continue drafting Reyner complaint - allegations supporting claim for breach of fiduciary duty  | Pham, Matt D.        | 1.30  | 538.20   | 42,607.80 | WO     | HD     | TR | _____ |
| 11/29/21   | 8649457 | Review, compile exhibits to new Reyner complaint  | Pham, Matt D.        | 0.60  | 248.40   | 42,856.20 | WO     | HD     | TR | _____ |
| 11/30/21   | 8648615 | Inventory of asset recovery efforts and confer with counsel regarding same (1.2); review documents in connection with pending settlements (0.9).                            | Del Castillo, Joshua | 2.10  | 1,351.35 | 44,207.55 | WO     | HD     | TR | _____ |
| 11/30/21   | 8651437 | Work on the issues related to the discovery, records production and coordination of discovery.  | Zaro, David          | 0.40  | 334.80   | 44,542.35 | WO     | HD     | TR | _____ |
| 12/01/21   | 8652965 | Review and respond to correspondence from opposing counsel in connection with outstanding asset recovery matters (0.5).   | Del Castillo, Joshua | 0.50  | 321.75   | 44,864.10 | WO     | HD     | TR | _____ |
| 12/03/21   | 8654990 | Review online docket and update case tracking document for all Winkler cases (.4); confer with Attorney del Castillo and Pham regarding impending deadlines (.2).           | O'Neal, Mikayla      | 0.60  | 189.00   | 45,053.10 | WO     | HD     | TR | _____ |
| 12/03/21   | 8655042 | Review documents and meeting with counsel regarding administration of pending and contemplated disgorgement matters (1.1); teleconferences and emails regarding same (0.9). | Del Castillo, Joshua | 2.00  | 1,287.00 | 46,340.10 | WO     | HD     | TR | _____ |
| 12/03/21   | 8659282 | Confer with Josh del Castillo regarding universal discovery approach/strategy with respect to nine pending disgorgement actions   | Pham, Matt D.        | 0.40  | 165.60   | 46,505.70 | WO     | HD     | TR | _____ |

01/28/22 16:45:49 PROFORMA STATEMENT FOR MATTER 378224.00003 (Winkler, Geoff/Receiver for Essex Capita) (Asset Recovery & Management)

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

| Trans Date | Index   | Description of Service Rendered  | Timekeeper           | Hours | Fees     | Sum       | Circle | Action |    |       |
|------------|---------|--|----------------------|-------|----------|-----------|--------|--------|----|-------|
| 12/08/21   | 8659034 | Emails and teleconferences with counsel regarding pending disgorgement matters (0.8).  | Del Castillo, Joshua | 0.80  | 514.80   | 47,020.50 | WO     | HD     | TR | _____ |
| 12/08/21   | 8659268 | Review dockets and update case tracking documents.   | O'Neal, Mikayla      | 0.50  | 157.50   | 47,178.00 | WO     | HD     | TR | _____ |
| 12/08/21   | 8670686 | Review and analyze pleadings, other filings, procedural statuses of nine disgorgement actions  | Pham, Matt D.        | 0.90  | 372.60   | 47,550.60 | WO     | HD     | TR | _____ |
| 12/08/21   | 8670699 | [Reyner II] Review and analyze CVL's RFA responses and Reyner deposition transcript from CVL litigation for inclusion in new complaint against Reyner  | Pham, Matt D.        | 1.30  | 538.20   | 48,088.80 | WO     | HD     | TR | _____ |
| 12/09/21   | 8660035 | Analysis of issues arising in connection with proposed McHugh settlement, and review accounting and settlement draft (0.8); prepare correspondence to and teleconference with R. Baker regarding same (0.4); emails to Receiver's office regarding same (0.1); review and respond to correspondence regarding other pending asset recovery matters (0.6); emails and teleconference with counsel regarding form discovery for disgorgement matters and review scheduling orders in connection with same (0.8). | Del Castillo, Joshua | 2.70  | 1,737.45 | 49,826.25 | WO     | HD     | TR | _____ |
| 12/09/21   | 8661082 | Emails concerning the recovery from McCue, the pending lawsuits and joint/coordinate discovery, follow-up (4). Prepare for/attend the meeting with the Receiver and Receiver team to address   | Zaro, David          | 1.20  | 1,004.40 | 50,830.65 | WO     | HD     | TR | _____ |

01/28/22 16:45:49 PROFORMA STATEMENT FOR MATTER 378224.00003 (Winkler, Geoff/Receiver for Essex Capita) (Asset Recovery & Management)

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

| <b>Trans Date</b> | <b>Index</b> | <b>Description of Service Rendered</b><br>recovery status/strategy, legal advice and to actions (.8).   | <b>Timekeeper</b>    | <b>Hours</b> | <b>Fees</b> | <b>Sum</b> | <b>Circle</b> | <b>Action</b> |    |       |
|-------------------|--------------|---|----------------------|--------------|-------------|------------|---------------|---------------|----|-------|
| 12/09/21          | 8666630      | Update tracking document and send email to Attorney del Castillo.   | O'Neal, Mikayla      | 0.20         | 63.00       | 50,893.65  | WO            | HD            | TR | _____ |
| 12/09/21          | 8670716      | [Reyner II] Continue drafting new complaint against Reyner - general allegations  | Pham, Matt D.        | 1.20         | 496.80      | 51,390.45  | WO            | HD            | TR | _____ |
| 12/09/21          | 8670741      | Review and analyze exemplars of discovery requests in disgorgement actions for preparation in creating universal set of discovery requests in nine disgorgement actions (1.0); create spreadsheet to coordinate discovery requests across nine disgorgement actions (0.4) | Pham, Matt D.        | 1.40         | 579.60      | 51,970.05  | WO            | HD            | TR | _____ |
| 12/10/21          | 8661438      | Emails with counsel regarding asset recovery litigation administration (0.5).   | Del Castillo, Joshua | 0.50         | 321.75      | 52,291.80  | WO            | HD            | TR | _____ |
| 12/10/21          | 8663287      | Several conferences and emails related to the docketing, coordination and scheduling, discovery issues, accounting and advice to counsel.   | Zaro, David          | 0.60         | 502.20      | 52,794.00  | WO            | HD            | TR | _____ |
| 12/10/21          | 8670759      | Begin drafting universal set of requests for production to be used across nine disgorgement actions   | Pham, Matt D.        | 1.80         | 745.20      | 53,539.20  | WO            | HD            | TR | _____ |
| 12/10/21          | 8670762      | Begin drafting universal set of interrogatories to be used across nine disgorgement actions   | Pham, Matt D.        | 1.50         | 621.00      | 54,160.20  | WO            | HD            | TR | _____ |
| 12/10/21          | 8670765      | Begin drafting universal set of requests for admission to be used across nine disgorgement actions  | Pham, Matt D.        | 1.80         | 745.20      | 54,905.40  | 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> |    |       |
|-------------------|--------------|---|----------------------|--------------|-------------|------------|---------------|---------------|----|-------|
| 12/13/21          | 8663340      | Confer with counsel regarding status of form discovery demands for disgorgement matters (0.6); analysis of prospective additional disgorgement and asset recovery claims and review associated documents (1.8). | Del Castillo, Joshua | 2.40         | 1,544.40    | 56,449.80  | WO            | HD            | TR | _____ |
| 12/14/21          | 8664413      | Review and respond to asset turnover and disgorgement correspondence and review documents transmitted by opposing counsel in connection with same (3.1).  | Del Castillo, Joshua | 3.10         | 1,994.85    | 58,444.65  | WO            | HD            | TR | _____ |
| 12/14/21          | 8670813      | [Reyner II] Perform research regarding legal standards for conspiracy and breach of implied duty of good faith and fair dealing   | Pham, Matt D.        | 0.70         | 289.80      | 58,734.45  | WO            | HD            | TR | _____ |
| 12/14/21          | 8670817      | [Reyner II] Continue drafting new complaint against Reyner - allegations supporting breach of implied duty of good faith and fair dealing   | Pham, Matt D.        | 0.90         | 372.60      | 59,107.05  | WO            | HD            | TR | _____ |
| 12/16/21          | 8667303      | Review and respond to correspondence regarding pending disgorgement efforts (0.4); confer with counsel regarding anticipated form discovery in connection with same (0.3).                                      | Del Castillo, Joshua | 0.70         | 450.45      | 59,557.50  | WO            | HD            | TR | _____ |
| 12/17/21          | 8668231      | Review and respond to correspondence regarding asset discovery, disputed claims, and Receiver's ongoing disgorgement efforts (0.5); review documents in connection with same (0.4).                             | Del Castillo, Joshua | 0.90         | 579.15      | 60,136.65  | WO            | HD            | TR | _____ |
| 12/17/21          | 8670850      | Continue drafting universal set of requests for admission for disgorgement actions  | Pham, Matt D.        | 1.70         | 703.80      | 60,840.45  | WO            | HD            | TR | _____ |

01/28/22 16:45:49 PROFORMA STATEMENT FOR MATTER 378224.00003 (Winkler, Geoff/Receiver for Essex Capita) (Asset Recovery & Management)

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

| Trans Date | Index   | Description of Service Rendered   | Timekeeper           | Hours | Fees     | Sum       | Circle | Action |    |       |
|------------|---------|---|----------------------|-------|----------|-----------|--------|--------|----|-------|
| 12/17/21   | 8670851 | Continue drafting universal set of interrogatories for disgorgement actions   | Pham, Matt D.        | 1.30  | 538.20   | 61,378.65 | WO     | HD     | TR | _____ |
| 12/17/21   | 8670852 | Continue drafting universal set of requests for production for disgorgement actions   | Pham, Matt D.        | 1.80  | 745.20   | 62,123.85 | WO     | HD     | TR | _____ |
| 12/19/21   | 8670069 | Attention to outstanding asset recovery matters, legal analysis of arguments raised by prospective additional disgorgement defendants, and prepare correspondence to counsel regarding same (3.3).  | Del Castillo, Joshua | 3.30  | 2,123.55 | 64,247.40 | WO     | HD     | TR | _____ |
| 12/20/21   | 8670053 | Review and analysis of arguments presented in McHugh settlement proposal and prepare detailed response to same (1.0).   | Del Castillo, Joshua | 1.00  | 643.50   | 64,890.90 | WO     | HD     | TR | _____ |
| 12/20/21   | 8671534 | Prepare for/attend team meeting and conference call related to fraudulent conveyance lawsuits, claims and third party litigation.   | Zaro, David          | 1.30  | 1,088.10 | 65,979.00 | WO     | HD     | TR | _____ |
| 12/21/21   | 8670885 | Review documents and prepare outline for standardized, initial document production packet for disgorgement matters; confer with counsel regarding same (1.3); emails with counsel regarding S. McHugh regarding settlement and prepare update to Receiver regarding same (0.5). | Del Castillo, Joshua | 1.80  | 1,158.30 | 67,137.30 | WO     | HD     | TR | _____ |
| 12/22/21   | 8672545 | Continue review of materials and assembly of standardized initial production documents for disgorgement matters; emails regarding same (1.5).   | Del Castillo, Joshua | 1.50  | 965.25   | 68,102.55 | WO     | HD     | TR | _____ |

01/28/22 16:45:49 PROFORMA STATEMENT FOR MATTER 378224.00003 (Winkler, Geoff/Receiver for Essex Capita) (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> |    |       |
|-------------------|--------------|---|----------------------|--------------|-------------|------------|---------------|---------------|----|-------|
| 12/23/21          | 8674933      | Attention to outstanding asset recovery issues (0.3).   | Del Castillo, Joshua | 0.30         | 193.05      | 68,295.60  | WO            | HD            | TR | _____ |
| 12/24/21          | 8675968      | Emails and teleconferences regarding pending asset recovery efforts (1.1); prepare revised McHugh settlement agreement (0.5).   | Del Castillo, Joshua | 1.60         | 1,029.60    | 69,325.20  | WO            | HD            | TR | _____ |
| 12/27/21          | 8676837      | Emails with counsel for Receiver and meeting to address coordination of discovery, follow-up as to strategy regarding fraudulent reconveyance.  | Zaro, David          | 0.70         | 585.90      | 69,911.10  | WO            | HD            | TR | _____ |
| 12/27/21          | 8682014      | Phone call with Josh del Castillo and Rachel Rosenblum regarding discovery approach and organization across outstanding disgorgement actions  | Pham, Matt D.        | 0.70         | 289.80      | 70,200.90  | WO            | HD            | TR | _____ |
| 12/28/21          | 8675980      | Review documents, and teleconferences and emails regarding pending disgorgement matters (1.3); prepare revised McHugh settlement agreement and transmit to opposing counsel for review and comment (1.0). | Del Castillo, Joshua | 2.30         | 1,480.05    | 71,680.95  | WO            | HD            | TR | _____ |
| 12/29/21          | 8677242      | Legal analysis of additional matters in connection with anticipated Motion for Summary Adjudication (1.1).  | Del Castillo, Joshua | 1.10         | 707.85      | 72,388.80  | WO            | HD            | TR | _____ |
| 12/29/21          | 8679941      | Work on the joint global discovery requests and responses related to the fraudulent conveyance claims (.5).   | Zaro, David          | 0.50         | 418.50      | 72,807.30  | WO            | HD            | TR | _____ |
| 12/30/21          | 8677890      | Continue legal analysis and revise MSA outline (2.2); review Court documents in connection with contemplated MSAs (0.7);  | Del Castillo, Joshua | 3.10         | 1,994.85    | 74,802.15  | WO            | HD            | TR | _____ |



01/28/22 16:45:49 PROFORMA STATEMENT FOR MATTER 378224.00003 (Winkler, Geoff/Receiver for Essex Capita) (Asset Recovery & Management)

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

| Trans Date | Index   | Description of Service Rendered   | Timekeeper           | Hours | Fees     | Sum       | Circle | Action |
|------------|---------|---|----------------------|-------|----------|-----------|--------|--------|
|            |         | email to counsel (0.2).   |                      |       |          |           |        |        |
| 12/31/21   | 8679849 | Attention to outstanding asset recovery tasks (0.9); review and prepare documents in connection with global asset recovery efforts (5.0); emails regarding same (0.5); teleconference regarding same (0.5). | Del Castillo, Joshua | 6.90  | 4,440.15 | 79,242.30 | WO     | HD TR  |

**Proforma Summary**

**Timekeeper**

| Number              | Timekeeper           | Hours         | Rate   | Amounts            |
|---------------------|----------------------|---------------|--------|--------------------|
| 000313              | Zaro, David          | 21.30         | 837.00 | 17,828.10          |
| 001842              | Del Castillo, Joshua | 74.30         | 643.50 | 47,812.05          |
| 002396              | O'Neal, Mikayla      | 3.30          | 315.00 | 1,039.50           |
| 002444              | Rosenblum, Rachel    | 0.50          | 202.50 | 101.25             |
| 002510              | Pham, Matt D.        | 30.10         | 414.00 | 12,461.40          |
|                     |                      | <u>129.50</u> |        | <u>\$79,242.30</u> |
| Subtotal Fees       |                      |               |        | \$79,242.30        |
| Discount            |                      |               |        | 0.00               |
| Total Fees          |                      |               |        | 79,242.30          |
| 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 6/30/2022: 10% off standard rates (automatic)

**Account Summary – As Of 01/28/22**

Fiscal YTD                      Calendar YTD                      LTD

01/28/22 16:45:49 PROFORMA STATEMENT FOR MATTER 378224.00003 (Winkler, Geoff/Receiver for Essex Capita) (Asset Recovery & Management)

|                     | Total            | Fees             | Disb.        | Total      | Fees       | Disb. | Total      | Fees       | Disbursements |
|---------------------|------------------|------------------|--------------|------------|------------|-------|------------|------------|---------------|
| Worked              | 242,571.15       | 241,752.15       | 819.00       | 11,549.70  | 11,549.70  | 0.00  | 851,684.97 | 851,573.47 | 111.50        |
| Unbilled Adj        | 1,806.75         | 1,806.75         | 0.00         | 0.00       | 0.00       | 0.00  | 41,808.06  | 41,808.06  | 0.00          |
| Billed              | 243,619.89       | 243,550.89       | 69.00        | 141,248.70 | 141,203.70 | 45.00 | 667,459.85 | 667,459.85 | 111.50        |
| Collected           | 243,619.89       | 243,550.89       | 69.00        | 141,248.70 | 141,203.70 | 45.00 | 667,571.35 | 667,459.85 | 111.50        |
| 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>98,741.70</b> | <b>98,741.70</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>      |                  |                  |              |            |            |       |            |            |               |

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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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01/28/22 16:45:50 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: 01/11/22      Matter Name: Investigation/Reporting  
 Proforma Number: 1135905  
 Client/Matter Joint Group # 378224-1

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

| Trans Date | Index   | Description of Service Rendered  | Timekeeper           | Hours | Fees   | Sum      | WO | HD | TR | Circle Action |
|------------|---------|--|----------------------|-------|--------|----------|----|----|----|---------------|
| 10/06/21   | 8592042 | Review and respond to correspondence from Receiver's office regarding necessary subpoena in connection with prospective asset recovery effort; review documents in connection with same (0.5). | Del Castillo, Joshua | 0.50  | 321.75 | 321.75   | WO | HD | TR | _____         |
| 10/16/21   | 8601715 | Review materials in connection with upcoming interim report; emails to counsel regarding same (1.0).   | Del Castillo, Joshua | 1.00  | 643.50 | 965.25   | WO | HD | TR | _____         |
| 10/25/21   | 8609641 | Confer with counsel regarding interim report (0.5).  | Del Castillo, Joshua | 0.50  | 321.75 | 1,287.00 | WO | HD | TR | _____         |
| 10/28/21   | 8615524 | Perform research regarding Ponzi scheme requirements (1.4); begin drafting memorandum regarding establishing existence of Ponzi scheme (0.8)   | Pham, Matt D.        | 2.20  | 910.80 | 2,197.80 | WO | HD | TR | _____         |
| 10/29/21   | 8616423 | Continue drafting memorandum regarding Ponzi scheme - general legal standards regarding Ponzi scheme   | Pham, Matt D.        | 1.20  | 496.80 | 2,694.60 | WO | HD | TR | _____         |

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

| <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> |    |       |
|-------------------|--------------|--|----------------------|--------------|-------------|------------|---------------|---------------|----|-------|
| 10/29/21          | 8616425      | Continue drafting memorandum regarding Ponzi scheme and statute of limitations - general legal standard regarding statute of limitations; discussion regarding timeliness of fraudulent transfer claims    | Pham, Matt D.        | 1.80         | 745.20      | 3,439.80   | WO            | HD            | TR | _____ |
| 11/03/21          | 8626572      | Continue drafting internal memorandum regarding Ponzi scheme and statute of limitations - argument/analysis regarding second and third elements of Ponzi scheme  | Pham, Matt D.        | 1.80         | 745.20      | 4,185.00   | WO            | HD            | TR | _____ |
| 11/09/21          | 8629203      | Review documents and continue drafting Ninth Interim Report (1.2).   | Del Castillo, Joshua | 1.20         | 772.20      | 4,957.20   | WO            | HD            | TR | _____ |
| 11/10/21          | 8630125      | Review documents and continue updated draft of Ninth Interim Report (1.5).   | Del Castillo, Joshua | 1.50         | 965.25      | 5,922.45   | WO            | HD            | TR | _____ |
| 11/10/21          | 8632391      | Phone call with John Hall regarding Essex financials   | Pham, Matt D.        | 0.80         | 331.20      | 6,253.65   | WO            | HD            | TR | _____ |
| 11/11/21          | 8631532      | Attention to outstanding discovery matters, revise and transmit subpoena for service, confer with counsel and Receiver's office regarding same (1.0).  | Del Castillo, Joshua | 1.00         | 643.50      | 6,897.15   | WO            | HD            | TR | _____ |
| 11/15/21          | 8634253      | Review Receiver's edits to draft interim report, complete same, along with additional revisions (0.5); prepare for and meeting with counsel to address ongoing discovery and document review issues (1.0). | Del Castillo, Joshua | 1.50         | 965.25      | 7,862.40   | WO            | HD            | TR | _____ |
| 11/15/21          | 8638178      | Review and analyze John Hall's analysis regarding Ponzi scheme (0.5); continue drafting internal memorandum regarding same (0.8)   | Pham, Matt D.        | 1.30         | 538.20      | 8,400.60   | WO            | HD            | TR | _____ |

01/28/22 16:45:50 PROFORMA STATEMENT FOR MATTER 378224.00004 (Winkler, Geoff/Receiver for Essex Capita) (Investigation/Reporting)

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

| Trans Date | Index   | Description of Service Rendered  | Timekeeper           | Hours | Fees     | Sum       | Circle | Action |    |       |
|------------|---------|--|----------------------|-------|----------|-----------|--------|--------|----|-------|
| 11/16/21   | 8638208 | Phone call with John Hall regarding Essex financials   | Pham, Matt D.        | 0.30  | 124.20   | 8,524.80  | WO     | HD     | TR | _____ |
| 11/17/21   | 8638162 | Emails, teleconferences, and attention to critical outstanding discovery matters (2.8).  | Del Castillo, Joshua | 2.80  | 1,801.80 | 10,326.60 | WO     | HD     | TR | _____ |
| 11/17/21   | 8638217 | Review and analyze John Hall's new analysis of Essex financials (0.5); continue drafting internal memorandum regarding Ponzi scheme (1.2)  | Pham, Matt D.        | 1.70  | 703.80   | 11,030.40 | WO     | HD     | TR | _____ |
| 11/17/21   | 8638237 | Continue drafting internal memorandum regarding Ponzi scheme and statute of limitations issues - analysis of statute of limitations defense (0.7); review and revise such memorandum (0.5) | Pham, Matt D.        | 1.20  | 496.80   | 11,527.20 | WO     | HD     | TR | _____ |
| 11/18/21   | 8643965 | Confer with David Zaro and Josh del Castillo regarding Ponzi prove up  | Pham, Matt D.        | 0.60  | 248.40   | 11,775.60 | WO     | HD     | TR | _____ |
| 11/18/21   | 8643970 | Revise Ponzi prove up internal memorandum per comments from David Zaro   | Pham, Matt D.        | 1.00  | 414.00   | 12,189.60 | WO     | HD     | TR | _____ |
| 11/18/21   | 8643974 | Continue revising Ponzi prove up memorandum - discussion regarding element #2 and element #3   | Pham, Matt D.        | 1.60  | 662.40   | 12,852.00 | WO     | HD     | TR | _____ |
| 11/19/21   | 8640594 | Review and respond to correspondence regarding outstanding subpoena for documents (0.2).   | Del Castillo, Joshua | 0.20  | 128.70   | 12,980.70 | WO     | HD     | TR | _____ |
| 11/21/21   | 8640947 | Finalize Ninth Interim Report and prepare for filing (0.7).  | Del Castillo, Joshua | 0.70  | 450.45   | 13,431.15 | WO     | HD     | TR | _____ |

01/28/22 16:45:50 PROFORMA STATEMENT FOR MATTER 378224.00004 (Winkler, Geoff/Receiver for Essex Capita) (Investigation/Reporting)

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

| <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> |    |       |
|-------------------|--------------|---|----------------------|--------------|-------------|------------|---------------|---------------|----|-------|
| 12/02/21          | 8654029      | Attention to outstanding discovery and subpoena issues; confer with and transmit materials to Receiver's office regarding same (0.5).   | Del Castillo, Joshua | 0.50         | 321.75      | 13,752.90  | WO            | HD            | TR | _____ |
| 12/14/21          | 8664517      | Emails with counsel regarding additional required discovery (0.3).  | Del Castillo, Joshua | 0.30         | 193.05      | 13,945.95  | WO            | HD            | TR | _____ |
| 12/15/21          | 8666054      | Confer with counsel regarding outstanding discovery (0.5); review correspondence from counsel for disgorgement defendants regarding defenses and attention to prospective discovery regarding same (0.8); review documents in connection with same (0.5). | Del Castillo, Joshua | 1.80         | 1,158.30    | 15,104.25  | WO            | HD            | TR | _____ |
| 12/17/21          | 8671508      | Work with counsel on the coordination of discovery and Receiver's production of records/accounting.   | Zaro, David          | 0.40         | 334.80      | 15,439.05  | WO            | HD            | TR | _____ |
| 12/20/21          | 8670117      | Review draft additional discovery and confer with counsel regarding same (1.5).   | Del Castillo, Joshua | 1.50         | 965.25      | 16,404.30  | WO            | HD            | TR | _____ |
| 12/23/21          | 8674932      | Review notes and confer with counsel regarding outstanding discovery matters (0.7).   | Del Castillo, Joshua | 0.70         | 450.45      | 16,854.75  | WO            | HD            | TR | _____ |
| 12/27/21          | 8675308      | Prepare for and teleconference with counsel regarding outstanding discovery issues (1.2).   | Del Castillo, Joshua | 1.20         | 772.20      | 17,626.95  | WO            | HD            | TR | _____ |
| 12/27/21          | 8675311      | meet and confer; review notes for research regarding discovery rules  | Rosenblum, Rachel    | 0.90         | 182.25      | 17,809.20  | WO            | HD            | TR | _____ |
| 12/30/21          | 8678251      | research regarding discovery  | Rosenblum, Rachel    | 2.80         | 567.00      | 18,376.20  | WO            | HD            | TR | _____ |

01/28/22 16:45:50 PROFORMA STATEMENT FOR MATTER 378224.00004 (Winkler, Geoff/Receiver for Essex Capita) (Investigation/Reporting)

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

| Trans Date | Index | Description of Service Rendered | Timekeeper | Hours | Fees | Sum | Circle Action |
|------------|-------|---------------------------------|------------|-------|------|-----|---------------|
|------------|-------|---------------------------------|------------|-------|------|-----|---------------|

**Proforma Summary**

**Timekeeper**

| Number              | Timekeeper           | Hours        | Rate   | Amounts            |
|---------------------|----------------------|--------------|--------|--------------------|
| 000313              | Zaro, David          | 0.40         | 837.00 | 334.80             |
| 001842              | Del Castillo, Joshua | 16.90        | 643.50 | 10,875.15          |
| 002444              | Rosenblum, Rachel    | 3.70         | 202.50 | 749.25             |
| 002510              | Pham, Matt D.        | 15.50        | 414.00 | 6,417.00           |
|                     |                      | <u>36.50</u> |        | <u>\$18,376.20</u> |
| Subtotal Fees       |                      |              |        | \$18,376.20        |
| Discount            |                      |              |        | 0.00               |
| Total Fees          |                      |              |        | 18,376.20          |
| 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 6/30/2022: 10% off standard rates (automatic)

**Account Summary – As Of 01/28/22**

|              | Fiscal YTD |           | Calendar YTD |          |          |       | LTD        |            |               |
|--------------|------------|-----------|--------------|----------|----------|-------|------------|------------|---------------|
|              | Total      | Fees      | Disb.        | Total    | Fees     | Disb. | Total      | Fees       | Disbursements |
| Worked       | 29,784.15  | 29,784.15 | 0.00         | 2,638.35 | 2,638.35 | 0.00  | 265,108.98 | 265,008.96 | 100.02        |
| Unbilled Adj | 334.80     | 334.80    | 0.00         | 0.00     | 0.00     | 0.00  | 23,360.67  | 23,360.67  | 0.00          |
| Billed       | 13,272.30  | 13,272.30 | 0.00         | 7,662.60 | 7,662.60 | 0.00  | 208,786.14 | 208,786.14 | 100.02        |
| Collected    | 13,272.30  | 13,272.30 | 0.00         | 7,662.60 | 7,662.60 | 0.00  | 208,886.16 | 208,786.14 | 100.02        |
| AR Write Off | 0.00       | 0.00      | 0.00         | 0.00     | 0.00     | 0.00  | 0.00       | 0.00       | 0.00          |

01/28/22 16:45:50 PROFORMA STATEMENT FOR MATTER 378224.00004 (Winkler, Geoff/Receiver for Essex Capita) (Investigation/Reporting)

|                             | <i>Total</i>     | <i>Fees</i>      | <i>Costs</i> |
|-----------------------------|------------------|------------------|--------------|
| <i>WIP Balance</i>          | <i>21,786.75</i> | <i>21,786.75</i> | <i>0.00</i>  |
| <i>AR Balance</i>           | <i>0.00</i>      | <i>0.00</i>      | <i>0.00</i>  |
| <i>Unalloc Payment</i>      | <i>0.00</i>      |                  |              |
| <i>Client Trust Balance</i> | <i>0.00</i>      |                  |              |

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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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 01/28/22 16:45:53 PROFORMA STATEMENT FOR MATTER 378224.00007 (Winkler, Geoff/Receiver for Essex Capita) (Pending Litigation)

**Preliminary Billing Form**

Billing Atty: 001842 - Del Castillo, Matter #: 378224.00007 Client Name: Winkler, Geoff/Receiver for Essex Capita  
 Joshua  
 Date of Last Billing: 01/11/22 Matter Name: Pending Litigation  
 Proforma Number: 1135905  
 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 |    |       |
|------------|---------|---|----------------------|-------|----------|----------|--------|--------|----|-------|
| 11/07/21   | 8645390 | Emails to counsel regarding pending state court litigation matters (0.5).   | Del Castillo, Joshua | 0.50  | 321.75   | 321.75   | WO     | HD     | TR | _____ |
| 11/10/21   | 8630157 | Review dockets regarding pending state court litigation and prepare summary for counsel (0.8).  | Del Castillo, Joshua | 0.80  | 514.80   | 836.55   | WO     | HD     | TR | _____ |
| 11/19/21   | 8640593 | Review dockets for all pending matters; confer with counsel regarding case administration; team meeting regarding discovery coordination and attention to pending litigation matters (2.4). | Del Castillo, Joshua | 2.40  | 1,544.40 | 2,380.95 | WO     | HD     | TR | _____ |

**Proforma Summary**

| Timekeeper    |                      | Hours | Rate   | Amounts    |
|---------------|----------------------|-------|--------|------------|
| Number        | Timekeeper           |       |        |            |
| 001842        | Del Castillo, Joshua | 3.70  | 643.50 | 2,380.95   |
|               |                      | 3.70  |        | \$2,380.95 |
| Subtotal Fees |                      |       |        | \$2,380.95 |
| Discount      |                      |       |        | 0.00       |
| Total Fees    |                      |       |        | 2,380.95   |

01/28/22 16:45:53 PROFORMA STATEMENT FOR MATTER 378224.00007 (Winkler, Geoff/Receiver for Essex Capita) (Pending Litigation)

**Proforma Summary**

**Timekeeper**

| Number              | Timekeeper | Hours | Rate | Amounts |
|---------------------|------------|-------|------|---------|
| Total Disbursements |            |       |      | 0.00    |

**Attorney Billing Instructions**

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

**Billing Instructions**

expires 6/30/2022: 10% off standard rates (automatic)

**Account Summary – As Of 01/28/22**

|                     | Fiscal YTD      |                 |             | Calendar YTD |          |       | LTD        |            |               |
|---------------------|-----------------|-----------------|-------------|--------------|----------|-------|------------|------------|---------------|
|                     | Total           | Fees            | Disb.       | Total        | Fees     | Disb. | Total      | Fees       | Disbursements |
| Worked              | 3,395.70        | 3,395.70        | 0.00        | 0.00         | 0.00     | 0.00  | 103,169.12 | 100,879.20 | 2,289.92      |
| Unbilled Adj        | 0.00            | 0.00            | 0.00        | 0.00         | 0.00     | 0.00  | 5,042.79   | 5,042.79   | 0.00          |
| Billed              | 2,370.92        | 2,211.75        | 159.17      | 1,049.90     | 1,014.75 | 35.15 | 88,096.86  | 88,096.86  | 2,289.92      |
| Collected           | 2,370.92        | 2,211.75        | 159.17      | 1,049.90     | 1,014.75 | 35.15 | 90,386.78  | 88,096.86  | 2,289.92      |
| 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>2,380.95</b> | <b>2,380.95</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

01/28/22 16:45:53 PROFORMA STATEMENT FOR MATTER 378224.00007 (Winkler, Geoff/Receiver for Essex Capita) (Pending Litigation)

100 Pine Street, Suite 900  
San Francisco, CA 94111-5222

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01/28/22 16:45:54 PROFORMA STATEMENT FOR MATTER 378224.00008 (Winkler, Geoff/Receiver for Essex Capita) (Claims/Distribution)

**Preliminary Billing Form**

Billing Atty: 001842 - Del Castillo, Matter #: 378224.00008 Client Name: Winkler, Geoff/Receiver for Essex Capita  
 Joshua  
 Date of Last Billing: 01/11/22 Matter Name: Claims/Distribution  
 Proforma Number: 1135905  
 Client/Matter Joint Group # 378224-1

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

| Trans Date | Index   | Description of Service Rendered   | Timekeeper           | Hours | Fees     | Sum      | Circle | Action |    |       |
|------------|---------|---|----------------------|-------|----------|----------|--------|--------|----|-------|
| 10/05/21   | 8590990 | Complete additional legal analysis in connection with anticipated motion to approve distribution plan, allowed claims, and distributions and confer with counsel regarding same (1.4); review and assemble documents in connection with motion (0.9); prepare initial outline for motion (0.9). | Del Castillo, Joshua | 3.20  | 2,059.20 | 2,059.20 | WO     | HD     | TR | _____ |
| 10/06/21   | 8593017 | Continue drafting Receiver's Motion to Approve Distribution Plan (1.9).   | Del Castillo, Joshua | 1.90  | 1,222.65 | 3,281.85 | WO     | HD     | TR | _____ |
| 10/12/21   | 8597614 | Complete additions and revisions to draft motion to approve distribution plan and allowed claims and confer with counsel regarding same (3.90; prepare update to Receiver regarding same (0.1).   | Del Castillo, Joshua | 4.00  | 2,574.00 | 5,855.85 | WO     | HD     | TR | _____ |
| 10/18/21   | 8604213 | Conferences with counsel regarding claims motion and follow-up to address revisions to draft.   | Zaro, David          | 0.60  | 502.20   | 6,358.05 | WO     | HD     | TR | _____ |
| 10/21/21   | 8606723 | Review and revise draft motion to approve distribution plan and recommended   | Del Castillo, Joshua | 1.50  | 965.25   | 7,323.30 | WO     | HD     | TR | _____ |

01/28/22 16:45:54 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> |    |       |
|-------------------|--------------|---|----------------------|--------------|-------------|------------|---------------|---------------|----|-------|
|                   |              | treatment of claims (1.5).  |                      |              |             |            |               |               |    |       |
| 10/22/21          | 8608053      | Additional legal analysis in connection with novel claims question and confer regarding same (0.8).   | Del Castillo, Joshua | 0.80         | 514.80      | 7,838.10   | WO            | HD            | TR | _____ |
| 11/01/21          | 8621327      | Correspondence with counsel and Receiver's office regarding motion to approve distribution plan and recommended treatment of claims; review documents in connection with same (0.7); voicemail regarding same (0.1); review correspondence from Receiver regarding objecting claimants and emails regarding same (0.3). | Del Castillo, Joshua | 1.10         | 707.85      | 8,545.95   | WO            | HD            | TR | _____ |
| 11/01/21          | 8623383      | Emails with Receiver and counsel concerning the disputed claims, follow-up call with counsel.   | Zaro, David          | 0.60         | 502.20      | 9,048.15   | WO            | HD            | TR | _____ |
| 11/05/21          | 8625654      | Review J. Hall requested revisions to Motion to Approve Distribution Plan and Recommended Treatment of Claims, prepare revisions and additions to brief, and emails and confer with counsel and Receiver's office regarding same (1.5).   | Del Castillo, Joshua | 1.50         | 965.25      | 10,013.40  | WO            | HD            | TR | _____ |
| 11/05/21          | 8630069      | Evaluate/revise further draft of the claims/distribution plan/motion and several emails/call with counsel related to the claims/distribution process.   | Zaro, David          | 0.70         | 585.90      | 10,599.30  | WO            | HD            | TR | _____ |
| 11/11/21          | 8631662      | Confer with Receiver's office regarding Motion to Approve Distribution Plan and Recommended Treatment of Claims, revise, and transmit to SEC to meet and  | Del Castillo, Joshua | 0.70         | 450.45      | 11,049.75  | WO            | HD            | TR | _____ |

01/28/22 16:45:54 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 |    |       |
|------------|---------|---|----------------------|-------|--------|-----------|--------|--------|----|-------|
| 11/11/21   | 8632762 | confer (0.7).<br>Conference with Receiver and counsel as to the disputed claims.  | Zaro, David          | 0.20  | 167.40 | 11,217.15 | WO     | HD     | TR | _____ |
| 11/16/21   | 8635569 | Teleconference with D. Zaro regarding claims (0.2); emails with Receiver's office regarding same (0.2).   | Del Castillo, Joshua | 0.40  | 257.40 | 11,474.55 | WO     | HD     | TR | _____ |
| 11/16/21   | 8637012 | Analysis of client chart, call with counsel to address claims motions, disputed claims, categories (.4). Follow-up call with Receiver, Mr. Hall as to the claims treatment, chart, motion and follow-up on claim register with Receiver counsel (.6). | Zaro, David          | 1.00  | 837.00 | 12,311.55 | WO     | HD     | TR | _____ |
| 11/18/21   | 8640010 | Email/call with counsel to address legal basis for claim, waiver, affiliate claim and advice as to treatment.   | Zaro, David          | 0.40  | 334.80 | 12,646.35 | WO     | HD     | TR | _____ |
| 11/30/21   | 8648590 | Review and revise motion to approve distribution plan, confer with counsel and finalize for deliver to SEC to meet and confer (1.3).  | Del Castillo, Joshua | 1.30  | 836.55 | 13,482.90 | WO     | HD     | TR | _____ |
| 12/07/21   | 8658784 | Several emails related to the claim of Wolanski with Wolanski counsel, follow-up on disputed amount.  | Zaro, David          | 0.60  | 502.20 | 13,985.10 | WO     | HD     | TR | _____ |
| 12/09/21   | 8660177 | Review and respond to correspondence from Receiver's office regarding timing of filing claims motion (0.1).   | Del Castillo, Joshua | 0.10  | 64.35  | 14,049.45 | WO     | HD     | TR | _____ |
| 12/09/21   | 8661083 | Evaluate several emails/analyses to address dispute as to Wolansky claim, follow-up with Receiver/Mr. Hall (.5). Email  | Zaro, David          | 0.80  | 669.60 | 14,719.05 | WO     | HD     | TR | _____ |

01/28/22 16:45:54 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> |    |    |       |
|-------------------|--------------|---|----------------------|--------------|-------------|------------|----------------------|----|----|-------|
|                   |              | response to counsel for Wolansky related to disputed claims (.3).   |                      |              |             |            |                      |    |    |       |
| 12/13/21          | 8664696      | Several emails/analysis of the disputed claims, including Wolansky (.3). Evaluate email from Wolansky counsel, assess spreadsheets/documents and several responses, email to Receiver (.6). | Zaro, David          | 0.90         | 753.30      | 15,472.35  | WO                   | HD | TR | _____ |
| 12/14/21          | 8665977      | Emails/analysis of the Wolansky documents and distribution agreement (.6). Conference with counsel related to distribution calculation/strategy (.3).                                       | Zaro, David          | 0.90         | 753.30      | 16,225.65  | WO                   | HD | TR | _____ |
| 12/15/21          | 8665971      | Review and prepare minor revisions to motion to approve distribution plan (0.7); prepare draft Winkler declaration in support of motion (0.6); prepare proposed order (0.5).                | Del Castillo, Joshua | 1.80         | 1,158.30    | 17,383.95  | WO                   | HD | TR | _____ |
| 12/15/21          | 8669712      | Further analysis and work on the Wolansky claim issues, review Receiver document, conference with counsel and email to Receiver regarding alleged damages.                                  | Zaro, David          | 0.80         | 669.60      | 18,053.55  | WO                   | HD | TR | _____ |
| 12/16/21          | 8667304      | Review correspondence and documents in connection with Wolansky claim (0.3).  | Del Castillo, Joshua | 0.30         | 193.05      | 18,246.60  | WO                   | HD | TR | _____ |
| 12/16/21          | 8669749      | Further research/analysis of disputed claims, follow-up analysis related to the Wolansky claim dispute (.4). Email to counsel for Wolansky related to claims dispute (.4).                  | Zaro, David          | 0.80         | 669.60      | 18,916.20  | WO                   | HD | TR | _____ |
| 12/17/21          | 8671483      | Further analysis of the Wolansky claim, email from counsel for Wolansky and   | Zaro, David          | 1.60         | 1,339.20    | 20,255.40  | WO                   | HD | TR | _____ |

01/28/22 16:45:54 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 |    |       |
|------------|---------|--|----------------------|-------|----------|-----------|--------|--------|----|-------|
|            |         | follow-up with the Receiver (.8).<br>Conference with counsel related to the distribution sums/calculations, notice and emails with Receiver (.8).  |                      |       |          |           |        |        |    |       |
| 12/20/21   | 8670102 | Emails with SEC regarding motion to approve distribution plan and allowed claims and confer with Receiver's office regarding same (0.5); finalize materials and prepare for filing (0.6).                          | Del Castillo, Joshua | 1.10  | 707.85   | 20,963.25 | WO     | HD     | TR | _____ |
| 12/20/21   | 8671543 | Calls with Receiver and counsel related to Mr. Wolansky's claim, the lease values and Neos (.4). Further analysis, call with Mr. Napoli related to the claim and response/email with Receiver (.4).                | Zaro, David          | 0.80  | 669.60   | 21,632.85 | WO     | HD     | TR | _____ |
| 12/21/21   | 8671152 | Attention to filing issues regarding motion to approve distribution plan (0.9).  | Del Castillo, Joshua | 0.90  | 579.15   | 22,212.00 | WO     | HD     | TR | _____ |
| 12/21/21   | 8676052 | Evaluate further issues and documents as to disputed claims, follow-up to assess Receiver response and email to Receiver/Mr. Hall (.7). Emails with counsel for claimant as to claim (.4).                         | Zaro, David          | 1.10  | 920.70   | 23,132.70 | WO     | HD     | TR | _____ |
| 12/22/21   | 8672796 | Review and respond to correspondence regarding Wolansky claims dispute and review materials provided by Receiver's office and opposing counsel in connection with same (0.9); teleconference regarding same (0.2). | Del Castillo, Joshua | 1.10  | 707.85   | 23,840.55 | WO     | HD     | TR | _____ |
| 12/22/21   | 8676080 | Analysis of further documents, emails and records related to Wolansky, email advice/recommendations to Receiver (.9).  | Zaro, David          | 1.80  | 1,506.60 | 25,347.15 | WO     | HD     | TR | _____ |



01/28/22 16:45:54 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 |    |       |
|------------|---------|---|----------------------|-------|----------|-----------|--------|--------|----|-------|
|            |         | Several follow-up emails/calls with counsel as to other claimants and disputes, analysis of issues related to evidence and advice to Receiver and Mr. Hall (.9).  |                      |       |          |           |        |        |    |       |
| 12/23/21   | 8676123 | Several emails and call with counsel related to the distribution issues and disputed claims (.4).   | Zaro, David          | 0.40  | 334.80   | 25,681.95 | WO     | HD     | TR | _____ |
| 12/27/21   | 8676839 | Address several emails related to claimant and distributions, follow-up (.3). Evaluate Wolansky claim dispute status and follow-up email with client and counsel (.6).  | Zaro, David          | 0.90  | 753.30   | 26,435.25 | WO     | HD     | TR | _____ |
| 12/28/21   | 8676862 | Follow-up with counsel and Receiver related to Wolansky claim (.4). Email to counsel for Wolansky (.2). Call with counsel, assess email related to possible claim dispute and evaluate prospects for discovery regarding claims dispute (.8). | Zaro, David          | 1.40  | 1,171.80 | 27,607.05 | WO     | HD     | TR | _____ |
| 12/29/21   | 8677116 | Review Wolansky opposition to claims motion and emails with counsel regarding same (0.6).   | Del Castillo, Joshua | 0.60  | 386.10   | 27,993.15 | WO     | HD     | TR | _____ |
| 12/29/21   | 8679948 | Several emails and follow-up call with counsel related to claims notices and disputes.  | Zaro, David          | 0.40  | 334.80   | 28,327.95 | WO     | HD     | TR | _____ |
| 12/30/21   | 8679996 | Evaluate opposition to disputed claim filed by Wolansky and follow-up thereon (.6). Email/call related to the disputed claims, motion for summary judgment and approach, evidence and accounting issues (.8).                                 | Zaro, David          | 1.40  | 1,171.80 | 29,499.75 | WO     | HD     | TR | _____ |

01/28/22 16:45:54 PROFORMA STATEMENT FOR MATTER 378224.00008 (Winkler, Geoff/Receiver for Essex Capita) (Claims/Distribution)

**Proforma Summary**

**Timekeeper**

| Number              | Timekeeper           | Hours | Rate   | Amounts     |
|---------------------|----------------------|-------|--------|-------------|
| 000313              | Zaro, David          | 18.10 | 837.00 | 15,149.70   |
| 001842              | Del Castillo, Joshua | 22.30 | 643.50 | 14,350.05   |
|                     |                      | 40.40 |        | \$29,499.75 |
| Subtotal Fees       |                      |       |        | \$29,499.75 |
| Discount            |                      |       |        | 0.00        |
| Total Fees          |                      |       |        | 29,499.75   |
| 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 6/30/2022: 10% off standard rates (automatic)

**Account Summary – As Of 01/28/22**

|                   | Fiscal YTD       |                  |              | Calendar YTD |          |       | LTD        |            |               |
|-------------------|------------------|------------------|--------------|--------------|----------|-------|------------|------------|---------------|
|                   | Total            | Fees             | Disb.        | Total        | Fees     | Disb. | Total      | Fees       | Disbursements |
| Worked            | 41,800.05        | 41,800.05        | 0.00         | 7,280.55     | 7,280.55 | 0.00  | 134,904.15 | 134,904.15 | 0.00          |
| Unbilled Adj      | 0.00             | 0.00             | 0.00         | 0.00         | 0.00     | 0.00  | 2,055.15   | 2,055.15   | 0.00          |
| Billed            | 5,476.05         | 5,476.05         | 0.00         | 4,440.60     | 4,440.60 | 0.00  | 89,287.65  | 89,287.65  | 0.00          |
| Collected         | 5,476.05         | 5,476.05         | 0.00         | 4,440.60     | 4,440.60 | 0.00  | 89,287.65  | 89,287.65  | 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>37,359.45</b> | <b>37,359.45</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>    |                  |                  |              |              |          |       |            |            |               |

01/28/22 16:45:54 PROFORMA STATEMENT FOR MATTER 378224.00008 (Winkler, Geoff/Receiver for Essex Capita) (Claims/Distribution)

**Client Trust**                    **0.00**  
**Balance**

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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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 01/28/22 16:45:55 PROFORMA STATEMENT FOR MATTER 378224.00013 (Winkler, Geoff/Receiver for Essex Capita) (CVL Litigation (Winlker v. 915 Elm Avenu)

**Preliminary Billing Form**

Billing Atty: 001842 - Del Castillo, Matter #: 378224.00013 Client Name: Winkler, Geoff/Receiver for Essex Capita  
 Joshua  
 Date of Last Billing: 01/11/22 Matter Name: CVL Litigation (Winlker v. 915 Elm Avenu  
 Proforma Number: 1135905  
 Client/Matter Joint Group # 378224-1

**Fees for Matter 378224.00013.(CVL Litigation (Winlker v. 915 Elm Avenu)**

| Trans Date | Index   | Description of Service Rendered   | Timekeeper           | Hours | Fees   | Sum      | Circle | Action |    |       |
|------------|---------|---|----------------------|-------|--------|----------|--------|--------|----|-------|
| 10/01/21   | 8589604 | Review offer of judgment and confer with counsel regarding same (0.6).  | Del Castillo, Joshua | 0.60  | 386.10 | 386.10   | WO     | HD     | TR | _____ |
| 10/01/21   | 8611651 | E-Mails with opposing counsel re settlement offer (.2). Emails with team re offer (.3).   | Lloyd, Kevin         | 0.50  | 335.25 | 721.35   | WO     | HD     | TR | _____ |
| 10/04/21   | 8589877 | Emails and conferences with counsel regarding CVL offer of judgment and procedural deficiencies with same; legal analysis regarding same (0.9). | Del Castillo, Joshua | 0.90  | 579.15 | 1,300.50 | WO     | HD     | TR | _____ |
| 10/04/21   | 8611663 | Emails with N. Aspis re depositions.  | Lloyd, Kevin         | 0.20  | 134.10 | 1,434.60 | WO     | HD     | TR | _____ |
| 10/04/21   | 8618506 | Confer with counsel regarding scheduling issues, deposition dates, and mediation issues (.5).   | Aspis, Norman        | 0.50  | 222.75 | 1,657.35 | WO     | HD     | TR | _____ |
| 10/05/21   | 8590681 | Confer with counsel regarding pending discovery and ongoing production; attention to Gally deposition issues and                                | Del Castillo, Joshua | 1.50  | 965.25 | 2,622.60 | WO     | HD     | TR | _____ |

01/28/22 16:45:55 PROFORMA STATEMENT FOR MATTER 378224.00013 (Winkler, Geoff/Receiver for Essex Capita) (CVL Litigation (Winlker v. 915 Elm Avenu)

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**Fees for Matter 378224.00013.(CVL Litigation (Winlker v. 915 Elm Avenu)**


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| Trans Date | Index   | Description of Service Rendered   | Timekeeper           | Hours | Fees     | Sum      | Circle | Action |    |       |
|------------|---------|---|----------------------|-------|----------|----------|--------|--------|----|-------|
|            |         | teleconference with counsel regarding same (1.5).   |                      |       |          |          |        |        |    |       |
| 10/05/21   | 8618510 | Confer with counsel regarding potential mediators and document production issues (.8).  | Aspis, Norman        | 0.80  | 356.40   | 2,979.00 | WO     | HD     | TR | _____ |
| 10/06/21   | 8617947 | Emails with N Aspis re discovery (.2). Communications with team re discovery (.5).  | Lloyd, Kevin         | 0.70  | 469.35   | 3,448.35 | WO     | HD     | TR | _____ |
| 10/06/21   | 8617948 | Research for depositions.   | Lloyd, Kevin         | 2.30  | 1,542.15 | 4,990.50 | WO     | HD     | TR | _____ |
| 10/07/21   | 8593043 | Review and respond to correspondence regarding pending discovery and depositions and confer with counsel regarding same (0.6).            | Del Castillo, Joshua | 0.60  | 386.10   | 5,376.60 | WO     | HD     | TR | _____ |
| 10/07/21   | 8617950 | Emails with opposing counsel re discovery dates (.3). Emails with third party witnesses (.2). Communications with team re discovery (.4). | Lloyd, Kevin         | 0.90  | 603.45   | 5,980.05 | WO     | HD     | TR | _____ |
| 10/07/21   | 8618596 | Confer with counsel and Mr. Gally regarding continuing the date for his deposition (.4).  | Aspis, Norman        | 0.40  | 178.20   | 6,158.25 | WO     | HD     | TR | _____ |
| 10/08/21   | 8594221 | Emails with counsel regarding status of outstanding discovery and deposition issues (0.6).  | Del Castillo, Joshua | 0.60  | 386.10   | 6,544.35 | WO     | HD     | TR | _____ |
| 10/08/21   | 8617954 | Review and edit Gally deposition outline (1.0). Emails with team re discovery (.2). Emails with third party witnesses (.1).               | Lloyd, Kevin         | 1.30  | 871.65   | 7,416.00 | WO     | HD     | TR | _____ |

01/28/22 16:45:55 PROFORMA STATEMENT FOR MATTER 378224.00013 (Winkler, Geoff/Receiver for Essex Capita) (CVL Litigation (Winlker v. 915 Elm Avenu)

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**Fees for Matter 378224.00013.(CVL Litigation (Winlker v. 915 Elm Avenu)**


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| <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> |    |    |       |
|-------------------|--------------|---|----------------------|--------------|-------------|------------|----------------------|----|----|-------|
| 10/08/21          | 8617955      | Research for discovery.   | Lloyd, Kevin         | 1.40         | 938.70      | 8,354.70   | WO                   | HD | TR | _____ |
| 10/08/21          | 8618601      | Review and revise draft deposition outline for J. Gally and confer with counsel regarding the same (1.2).   | Aspis, Norman        | 1.20         | 534.60      | 8,889.30   | WO                   | HD | TR | _____ |
| 10/11/21          | 8596096      | Confer extensively with K. Lloyd and N. Aspis regarding pending discovery and upcoming depositions; review materials in connection with same (1.8). | Del Castillo, Joshua | 1.80         | 1,158.30    | 10,047.60  | WO                   | HD | TR | _____ |
| 10/11/21          | 8611698      | Meeting with Josh del Castillo re discovery (.2). Meeting with Norm Aspis re depositions (.5).  | Lloyd, Kevin         | 0.70         | 469.35      | 10,516.95  | WO                   | HD | TR | _____ |
| 10/11/21          | 8618638      | Confer with counsel regarding Gally deposition outline (.5).  | Aspis, Norman        | 0.50         | 222.75      | 10,739.70  | WO                   | HD | TR | _____ |
| 10/12/21          | 8597277      | Emails and confer with counsel regarding outstanding discovery and deposition issues (0.5).   | Del Castillo, Joshua | 0.50         | 321.75      | 11,061.45  | WO                   | HD | TR | _____ |
| 10/12/21          | 8615800      | Emails with opposing counsel re discovery (.2). Emails with team re discovery (.2).   | Lloyd, Kevin         | 0.40         | 268.20      | 11,329.65  | WO                   | HD | TR | _____ |
| 10/12/21          | 8615805      | Research for depositions.   | Lloyd, Kevin         | 4.80         | 3,218.40    | 14,548.05  | WO                   | HD | TR | _____ |
| 10/13/21          | 8598444      | Follow-up with K. Lloyd and N. Aspis regarding outstanding discovery and deposition matters (0.5).  | Del Castillo, Joshua | 0.50         | 321.75      | 14,869.80  | WO                   | HD | TR | _____ |
| 10/13/21          | 8617956      | Editing deposition outline (.9). Emails with team re deposition outlines (.4). Communications with team re deposition                               | Lloyd, Kevin         | 1.80         | 1,206.90    | 16,076.70  | WO                   | HD | TR | _____ |

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**Fees for Matter 378224.00013.(CVL Litigation (Winlker v. 915 Elm Avenu)**


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| Trans Date | Index   | Description of Service Rendered (.5).  | Timekeeper           | Hours | Fees     | Sum       | Circle | Action |    |       |
|------------|---------|--|----------------------|-------|----------|-----------|--------|--------|----|-------|
| 10/13/21   | 8618654 | Review and revise Gally deposition outline and confer with counsel regarding the same (.7).  | Aspis, Norman        | 0.70  | 311.85   | 16,388.55 | WO     | HD     | TR | _____ |
| 10/14/21   | 8599666 | Confer regarding Gally deposition prep and attention to discovery issues (0.9).  | Del Castillo, Joshua | 0.90  | 579.15   | 16,967.70 | WO     | HD     | TR | _____ |
| 10/14/21   | 8617960 | Emails with team re deposition (.9). Meetings with team re deposition (.7). Emails with opposing counsel (.1).   | Lloyd, Kevin         | 1.70  | 1,139.85 | 18,107.55 | WO     | HD     | TR | _____ |
| 10/14/21   | 8618665 | Prepare for Gally deposition and confer with counsel regarding the same (1.4).   | Aspis, Norman        | 1.40  | 623.70   | 18,731.25 | WO     | HD     | TR | _____ |
| 10/15/21   | 8600891 | Review and respond to correspondence regarding Gally deposition; confer with counsel regarding same (1.5).   | Del Castillo, Joshua | 1.50  | 965.25   | 19,696.50 | WO     | HD     | TR | _____ |
| 10/15/21   | 8617963 | Emails with team re deposition (.6). Meetings with N. Aspis re deposition (.6). Calls with N Aspis re deposition (.1).   | Lloyd, Kevin         | 1.30  | 871.65   | 20,568.15 | WO     | HD     | TR | _____ |
| 10/15/21   | 8618669 | Prepare for and participate in deposition of J. Gally (4.4).   | Aspis, Norman        | 4.40  | 1,960.20 | 22,528.35 | WO     | HD     | TR | _____ |
| 10/18/21   | 8602819 | Emails and confer with counsel regarding pending discovery efforts; review Gally deposition transcript and strategize with counsel given favorable testimony from Mr. Gally (1.6). | Del Castillo, Joshua | 1.60  | 1,029.60 | 23,557.95 | WO     | HD     | TR | _____ |
| 10/18/21   | 8611736 | Emails with N Aspis re deposition (.1); Emails with opposing counsel re depositions (.1). Meeting with N Aspis re  | Lloyd, Kevin         | 0.60  | 402.30   | 23,960.25 | WO     | HD     | TR | _____ |

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**Fees for Matter 378224.00013.(CVL Litigation (Winlker v. 915 Elm Avenu)**


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| <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> |    |       |
|-------------------|--------------|--|----------------------|--------------|-------------|------------|---------------|---------------|----|-------|
|                   |              | discovery (.1). Meeting with J Del Castillo and N Aspis re discovery (.3).   |                      |              |             |            |               |               |    |       |
| 10/19/21          | 8620032      | Communications with team re discovery.   | Lloyd, Kevin         | 0.50         | 335.25      | 24,295.50  | WO            | HD            | TR | _____ |
| 10/20/21          | 8605744      | Confer with counsel and Receiver regarding CVL discovery and mediation issues (0.9).   | Del Castillo, Joshua | 0.90         | 579.15      | 24,874.65  | WO            | HD            | TR | _____ |
| 10/20/21          | 8608211      | Meeting with counsel to address the settlement options, Galley deposition impact upon the case.  | Zaro, David          | 0.40         | 334.80      | 25,209.45  | WO            | HD            | TR | _____ |
| 10/20/21          | 8618715      | Commence preparing RFAs to CVL and confer with counsel regarding the same and mediation issues (1.2).  | Aspis, Norman        | 1.20         | 534.60      | 25,744.05  | WO            | HD            | TR | _____ |
| 10/20/21          | 8620081      | Emails with team re discovery (.2). Emails with opposing counsel re mediators (.2). meetings with team re discovery (.5). Research for RFAs (.6).  | Lloyd, Kevin         | 1.50         | 1,005.75    | 26,749.80  | WO            | HD            | TR | _____ |
| 10/20/21          | 8620091      | Research for depositions.  | Lloyd, Kevin         | 2.40         | 1,609.20    | 28,359.00  | WO            | HD            | TR | _____ |
| 10/21/21          | 8606760      | Confer with counsel regarding outstanding discovery and mediation matters and review documents in connection with same (0.9).  | Del Castillo, Joshua | 0.90         | 579.15      | 28,938.15  | WO            | HD            | TR | _____ |
| 10/21/21          | 8611766      | Emails with N Aspis re RFAs (.2). Meeting with Norm Aspis re RFA (.3). Emails with opposing counsel (.3). Prep for discovery call with opposing counsel (.3). Call with opposing counsel re discovery (.3). Meetings with N Aspis re discovery (.3). Emails with counsel for third party | Lloyd, Kevin         | 3.60         | 2,413.80    | 31,351.95  | WO            | HD            | TR | _____ |



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**Fees for Matter 378224.00013.(CVL Litigation (Winlker v. 915 Elm Avenu)**


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| Trans Date | Index   | Description of Service Rendered  | Timekeeper           | Hours | Fees     | Sum       | Circle | Action |    |       |
|------------|---------|--|----------------------|-------|----------|-----------|--------|--------|----|-------|
|            |         | witnesses (.3). Emails with potential mediators (.2). Emails with team re discovery (.3). Research for RFA (1.1)   |                      |       |          |           |        |        |    |       |
| 10/21/21   | 8618717 | Finalize RFAs to CVL and confer with counsel regarding the same (.4); confer with counsel regarding extending discovery and mediation deadlines (.5).  | Aspis, Norman        | 0.90  | 400.95   | 31,752.90 | WO     | HD     | TR | _____ |
| 10/22/21   | 8611770 | Editing requests for admission (1.0).  | Lloyd, Kevin         | 1.00  | 670.50   | 32,423.40 | WO     | HD     | TR | _____ |
| 10/25/21   | 8610044 | Attention to outstanding written discovery and confer with K. Lloyd and N. Aspis regarding same (0.5).   | Del Castillo, Joshua | 0.50  | 321.75   | 32,745.15 | WO     | HD     | TR | _____ |
| 10/25/21   | 8611775 | Edit RFAs (.8). Emails with opposing counsel (.1). Emails with G. Winkler (.1). Emails with team re scheduling (.3).   | Lloyd, Kevin         | 1.30  | 871.65   | 33,616.80 | WO     | HD     | TR | _____ |
| 10/25/21   | 8612643 | Work with counsel, analysis of the Gally testimony, the CVL defenses, counterclaim/cross-claim based upon Receiver's interest in CVL.  | Zaro, David          | 0.70  | 585.90   | 34,202.70 | WO     | HD     | TR | _____ |
| 10/26/21   | 8611808 | Attention to outstanding discovery, mediation, and trial-related matters and confer with counsel regarding same (0.7).   | Del Castillo, Joshua | 0.70  | 450.45   | 34,653.15 | WO     | HD     | TR | _____ |
| 10/26/21   | 8615837 | Emails with G Winkler (.3). Emails with N. Aspis (.1). Prep for witness call (.2). Call with accountant (.5). Meetings with N Aspis re discovery (.2). Emails with J Del Castillo (.1). Review call notes (.3). Emails with team re discovery (.7). Emails with team re depositions (.6). Emails with accountant | Lloyd, Kevin         | 4.00  | 2,682.00 | 37,335.15 | WO     | HD     | TR | _____ |

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**Fees for Matter 378224.00013.(CVL Litigation (Winlker v. 915 Elm Avenu)**

| Trans Date | Index   | Description of Service Rendered  | Timekeeper           | Hours | Fees   | Sum       | Circle | Action |    |       |
|------------|---------|--|----------------------|-------|--------|-----------|--------|--------|----|-------|
|            |         | (.1). Emails with mediator (.4). Emails with opposing counsel (.3). Review discovery materials (.2).   |                      |       |        |           |        |        |    |       |
| 10/26/21   | 8618745 | Prepare for and participate in meeting with Damitz Brooks and confer with counsel regarding the same (.8); review records in connection with P. Presley and Damitz Brooks and confer with counsel regarding the same (.4). | Aspis, Norman        | 1.20  | 534.60 | 37,869.75 | WO     | HD     | TR | _____ |
| 10/27/21   | 8613115 | Review materials and confer with counsel regarding pending discovery and depositions, Receiver's proposed visit to lumber yard, and mediation (1.2).   | Del Castillo, Joshua | 1.20  | 772.20 | 38,641.95 | WO     | HD     | TR | _____ |
| 10/27/21   | 8616418 | Emails with third party witnesses (.2). Review production documents and emails with team re same (.3). Emails with team re discovery (.3). Meetings with J Del Castillo re discovery (.4).                                 | Lloyd, Kevin         | 1.20  | 804.60 | 39,446.55 | WO     | HD     | TR | _____ |
| 10/28/21   | 8614038 | Confer with counsel regarding CVL deposition and mediation matters (0.7).  | Del Castillo, Joshua | 0.70  | 450.45 | 39,897.00 | WO     | HD     | TR | _____ |
| 10/28/21   | 8620126 | Communications with team re discovery (.5). Emails with N Aspis re deposition outlines (.1).   | Lloyd, Kevin         | 0.60  | 402.30 | 40,299.30 | WO     | HD     | TR | _____ |
| 10/29/21   | 8616458 | Review and respond to correspondence from counsel regarding CVL mediation scheduling, deposition scheduling, and Receiver's requested visit to lumber yard (0.5).  | Del Castillo, Joshua | 0.50  | 321.75 | 40,621.05 | WO     | HD     | TR | _____ |

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**Fees for Matter 378224.00013.(CVL Litigation (Winlker v. 915 Elm Avenu)**

| Trans Date | Index   | Description of Service Rendered  | Timekeeper           | Hours | Fees     | Sum       | Circle | Action |    |       |
|------------|---------|--|----------------------|-------|----------|-----------|--------|--------|----|-------|
| 10/29/21   | 8618761 | Prepare and revise deposition outline for Reyner and confer with counsel regarding the same (1.4).   | Aspis, Norman        | 1.40  | 623.70   | 41,244.75 | WO     | HD     | TR | _____ |
| 10/29/21   | 8620146 | Review Reyner outline (1.1). Emails with mediator and team re scheduling (.4). Emails with opposing counsel re depositions (.4). Emails with opposing counsel re discovery (.2).                                     | Lloyd, Kevin         | 2.10  | 1,408.05 | 42,652.80 | WO     | HD     | TR | _____ |
| 11/01/21   | 8621358 | Emails with counsel and follow-up regarding CVL discovery extensions and associated matters (0.5); review mediator order and confer regarding mediation brief (0.8); attention to case administration (0.2).         | Del Castillo, Joshua | 1.50  | 965.25   | 43,618.05 | WO     | HD     | TR | _____ |
| 11/01/21   | 8623386 | work with counsel to address discovery issues, the Receiver's production and evaluate the outline of ponzi argument.   | Zaro, David          | 0.60  | 502.20   | 44,120.25 | WO     | HD     | TR | _____ |
| 11/01/21   | 8651746 | Emails with opposing counsel and mediator re mediation (.2). Communications with team and opposing counsel re receiver site visit (.2). Draft depo outline (2.0)   | Lloyd, Kevin         | 2.40  | 1,609.20 | 45,729.45 | WO     | HD     | TR | _____ |
| 11/02/21   | 8622465 | Review correspondence regarding pending litigation and discovery, and Receiver's request to tour the CVL facility (0.3).   | Del Castillo, Joshua | 0.30  | 193.05   | 45,922.50 | WO     | HD     | TR | _____ |
| 11/02/21   | 8651757 | Emails with team re discovery (.2). Communications with mediator (.3). Emails with opposing counsel re discovery (.2). Emails with team re inspection (.6). Research on inspection rights under California law (.2). | Lloyd, Kevin         | 1.50  | 1,005.75 | 46,928.25 | WO     | HD     | TR | _____ |

01/28/22 16:45:55 PROFORMA STATEMENT FOR MATTER 378224.00013 (Winkler, Geoff/Receiver for Essex Capita) (CVL Litigation (Winlker v. 915 Elm Avenu)

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**Fees for Matter 378224.00013.(CVL Litigation (Winlker v. 915 Elm Avenu)**


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| <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> |    |       |
|-------------------|--------------|--|----------------------|--------------|-------------|------------|---------------|---------------|----|-------|
| 11/03/21          | 8623368      | Review and respond to correspondence regarding pending discovery and Receiver request regarding CVL visit (0.9); attention to mediation issues (0.5).  | Del Castillo, Joshua | 1.40         | 900.90      | 47,829.15  | WO            | HD            | TR | _____ |
| 11/03/21          | 8652873      | Emails with team and opposing counsel re lumber yard visit and opposing counsel (1.1). Emails with team re discovery (.5). Emails with receiver re deposition (.2). Emails with opposing counsel re discovery (.4). Emails re call with opposing counsel (.2).   | Lloyd, Kevin         | 2.40         | 1,609.20    | 49,438.35  | WO            | HD            | TR | _____ |
| 11/04/21          | 8628581      | Several emails and meeting with counsel to address mediation and depositions (.4). Calls with counsel and clients related to CVL deposition, follow-up (.4).   | Zaro, David          | 0.80         | 669.60      | 50,107.95  | WO            | HD            | TR | _____ |
| 11/04/21          | 8652884      | Emails with team re depositions (.3). Review deposition notice (.1). Emails with opposing counsel re call (.3). Drafting deposition outline (1.3). Emails with team re exhibits to depositions and supporting documents (.5). Emails with N Apsis re CVL note payments (.3). Emails with receiver (.1). Emails with team re Piper Presley (.2). Review Piper Presley document (.2) | Lloyd, Kevin         | 3.30         | 2,212.65    | 52,320.60  | WO            | HD            | TR | _____ |
| 11/05/21          | 8625653      | Confer with counsel, emails, and teleconferences regarding pending CVL discovery, mediation, and associated matters (1.5).   | Del Castillo, Joshua | 1.50         | 965.25      | 53,285.85  | WO            | HD            | TR | _____ |
| 11/05/21          | 8651782      | Editing deposition outline (1.1). Emails with team re deposition outline (.1). Emails with   | Lloyd, Kevin         | 2.30         | 1,542.15    | 54,828.00  | WO            | HD            | TR | _____ |

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|            |         | opposing counsel re receiver visit to CVL (.3). Emails with team re receiver visit (.2). Call with opposing counsel (.3). Email with opposing counsel re discovery stipulation (.3).               |                      |       |          |           |        |        |    |       |
| 11/08/21   | 8627147 | Attention to scheduling and mediation issues and confer with counsel regarding same (0.9).   | Del Castillo, Joshua | 0.90  | 579.15   | 55,407.15 | WO     | HD     | TR | _____ |
| 11/08/21   | 8630084 | Evaluate issues concerning the site visit, Mr. Winkler's deposition/preparation and call related to the same.  | Zaro, David          | 0.60  | 502.20   | 55,909.35 | WO     | HD     | TR | _____ |
| 11/08/21   | 8648759 | Emails with opposing counsel (.2). Emails with team re discovery (.8). Meeting with team re discovery (.3). Emails with receiver (.1). Editing depo outline (.5).                                  | Lloyd, Kevin         | 1.90  | 1,273.95 | 57,183.30 | WO     | HD     | TR | _____ |
| 11/09/21   | 8628714 | Attention to CVL discovery and mediation matters and confer with counsel regarding same (1.5).   | Del Castillo, Joshua | 1.50  | 965.25   | 58,148.55 | WO     | HD     | TR | _____ |
| 11/09/21   | 8648947 | Emails with team Re discovery (.6). Review discovery (.7). Communications with team re discovery (.5). Review Gally deposition transcript and exhibits (.8). Review court order re discovery (.1). | Lloyd, Kevin         | 2.70  | 1,810.35 | 59,958.90 | WO     | HD     | TR | _____ |
| 11/09/21   | 8648948 | Review database to determine documents produced.   | Lloyd, Kevin         | 0.70  | 469.35   | 60,428.25 | WO     | HD     | TR | _____ |
| 11/10/21   | 8632430 | Review and analyze CVL document production to locate certain documents per Kevin Lloyd's direction   | Pham, Matt D.        | 0.90  | 372.60   | 60,800.85 | WO     | HD     | TR | _____ |

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| 11/10/21          | 8648962      | Review discovery order (.2). Emails with opposing counsel re discovery production (.1). Review discovery production (.5). Emails with receiver (.1). Communications with third party witnesses (.1). review third party witness documents (.5). Emails with M Pham (.2). Call with M Pham re documents (.1).  | Lloyd, Kevin         | 1.80         | 1,206.90    | 62,007.75  | WO            | HD            | TR | _____ |
| 11/11/21          | 8631682      | Confer with Receiver regarding proposed visit to Lumber Yard and prepare update to opposing counsel regarding same (0.2).   | Del Castillo, Joshua | 0.20         | 128.70      | 62,136.45  | WO            | HD            | TR | _____ |
| 11/11/21          | 8632448      | Locate and review documents from CVL document production regarding Essex note to Galley and CVL note to Essex   | Pham, Matt D.        | 1.50         | 621.00      | 62,757.45  | WO            | HD            | TR | _____ |
| 11/11/21          | 8648783      | Emails with J Del Castillo re discovery (.1). Emails with M Pham re discovery (.7). Meeting with J Del Castillo re discovery (.7). Research for depositions (.6). Emails with opposing counsel re inspection (.1). Emails with team re CVL tax returns (.3). Editing deposition outline (1.4). Emails with J Del Castillo re deposition outline (.1). | Lloyd, Kevin         | 4.00         | 2,682.00    | 65,439.45  | WO            | HD            | TR | _____ |
| 11/12/21          | 8632470      | Review and comment regarding Reyner deposition outline and confer with counsel regarding same (0.7); emails regarding discovery issues (0.3).   | Del Castillo, Joshua | 1.00         | 643.50      | 66,082.95  | WO            | HD            | TR | _____ |
| 11/12/21          | 8651811      | Emails with J Del Castillo re deposition (.4). Call with J Del Castillo (.3).   | Lloyd, Kevin         | 0.70         | 469.35      | 66,552.30  | WO            | HD            | TR | _____ |
| 11/14/21          | 8637225      | research regarding LLC  | Rosenblum, Rachel    | 0.50         | 101.25      | 66,653.55  | WO            | HD            | TR | _____ |

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|-------------------|--------------|---|----------------------|--------------|-------------|------------|---------------|---------------|----|-------|
| 11/14/21          | 8648805      | Editing deposition outlines (1.2). Discovery research (.9).   | Lloyd, Kevin         | 2.10         | 1,408.05    | 68,061.60  | WO            | HD            | TR | _____ |
| 11/15/21          | 8634099      | Emails regarding outstanding discovery matters (0.3); review mediator procedures, review documents, and commence preparation of confidential mediation statement (3.1); emails with Receiver regarding deposition preparation and assemble materials for Receiver in connection with same (0.5).                                    | Del Castillo, Joshua | 3.90         | 2,509.65    | 70,571.25  | WO            | HD            | TR | _____ |
| 11/15/21          | 8638181      | Review deposition outline; compile deposition exhibits  | Pham, Matt D.        | 1.10         | 455.40      | 71,026.65  | WO            | HD            | TR | _____ |
| 11/15/21          | 8648824      | Meetings with Josh Del Castillo re discovery (.5). Emails with J Del Castillo re discovery (.5). Research for discovery (.6). Email with Receiver (.1). Emails with M Pham re deposition (.3). Editing Reyner outline (.1).   | Lloyd, Kevin         | 2.10         | 1,408.05    | 72,434.70  | WO            | HD            | TR | _____ |
| 11/16/21          | 8636052      | Confer with counsel and Receiver's office regarding pending discovery matters (0.4); review and respond to correspondence regarding Receiver's right to requested tax information (0.2); review correspondence from CVL counsel regarding depositions (0.1); continue drafting and revising Confidential Mediation Statement (2.1). | Del Castillo, Joshua | 2.80         | 1,801.80    | 74,236.50  | WO            | HD            | TR | _____ |
| 11/16/21          | 8637711      | research regarding LLC  | Rosenblum, Rachel    | 0.90         | 182.25      | 74,418.75  | WO            | HD            | TR | _____ |
| 11/16/21          | 8648829      | Emails with team and client re deposition prep (.2). Emails with team re deposition   | Lloyd, Kevin         | 3.70         | 2,480.85    | 76,899.60  | WO            | HD            | TR | _____ |

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|            |         | (.1). Research for depositions (.8). Review research on tax returns (.3). Emails with team re tax returns (.3). Emails with opposing counsel and team re depositions (.5). Prepare for Reyner depositions (1.0). Communications with team re discovery (.5).   |                      |       |          |           |        |        |    |       |
| 11/17/21   | 8637223 | Review demand letter to Cousineau regarding tax documents (0.1); confer with counsel regarding outstanding discovery matters (0.6); review materials in connection with same (0.4); prepare for and teleconference with Receiver regarding deposition preparation (1.0).   | Del Castillo, Joshua | 2.10  | 1,351.35 | 78,250.95 | WO     | HD     | TR | _____ |
| 11/17/21   | 8638654 | draft letter to Cousineau  | Rosenblum, Rachel    | 0.60  | 121.50   | 78,372.45 | WO     | HD     | TR | _____ |
| 11/17/21   | 8648855 | Communications with Veritext re deposition (.2). Call with Veritext re depositions (.3). Emails with team and opposing counsel re depo subpoenas (.2). Review and editing deposition exhibits (2.1). Prepare for call with Geoff Winkler (.2). Call with G Winkler re deposition (.6). prepare for Reyner deposition (.2). Communications with team re deposition (.4) Call with Matt Pham re deposition exhibits (.1). Editing deposition outline (1.0). Review tax return letter (.2). Emails with team re tax return letter (.2). | Lloyd, Kevin         | 5.70  | 3,821.85 | 82,194.30 | WO     | HD     | TR | _____ |
| 11/18/21   | 8638163 | Review and revise demand letter (0.5).   | Del Castillo, Joshua | 0.50  | 321.75   | 82,516.05 | WO     | HD     | TR | _____ |



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| 11/18/21          | 8643976      | Confer with Kevin Lloyd regarding Reyner deposition and general litigation strategy   | Pham, Matt D.        | 0.50         | 207.00      | 82,723.05  | WO            | HD            | TR | _____ |
| 11/18/21          | 8648865      | Prepare for Reyner deposition (2.2). attend Reyner deposition (4.5). Meetings with team re Reyner deposition (.6). Emails with opposing counsel (.1). Emails with team (.3).  | Lloyd, Kevin         | 7.70         | 5,162.85    | 87,885.90  | WO            | HD            | TR | _____ |
| 11/19/21          | 8639777      | Confer with counsel regarding results of Reyner deposition as relates to prospective mediation and settlement (0.5).  | Del Castillo, Joshua | 0.50         | 321.75      | 88,207.65  | WO            | HD            | TR | _____ |
| 11/19/21          | 8648872      | Meetings with team re pretrial strategy (.6). Communications with M Pham re memo (.2). Prepare for Winkler deposition (2.9).  | Lloyd, Kevin         | 3.70         | 2,480.85    | 90,688.50  | WO            | HD            | TR | _____ |
| 11/22/21          | 8641346      | Meet with Receiver and discuss deposition preparation and litigation strategy and confer with counsel regarding same (1.3); confer with counsel after completion of Receiver's deposition (0.4); confer with counsel regarding mediation strategy and update and revise Confidential Mediation Statement (2.0). | Del Castillo, Joshua | 3.70         | 2,380.95    | 93,069.45  | WO            | HD            | TR | _____ |
| 11/22/21          | 8646171      | IDENTIFY RELEVANT CVL DOCUMENTS FOR ATTORNEY REVIEW   | Neglia, Ross         | 0.40         | 126.00      | 93,195.45  | WO            | HD            | TR | _____ |
| 11/22/21          | 8646177      | IDENTIFY RELEVANT DEPOSITION TESTIMONY AND EXHIBITS FOR ATTORNEY REVIEW   | Neglia, Ross         | 0.30         | 94.50       | 93,289.95  | WO            | HD            | TR | _____ |
| 11/22/21          | 8646310      | Work with Receiver and counsel related to the damages, CVL, Receiver counter-claim, separation action arising out of the capital  | Zaro, David          | 0.90         | 753.30      | 94,043.25  | WO            | HD            | TR | _____ |

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| 11/22/21   | 8646514 | call claim.<br>confer with counsel (.3); document review for production (1.1)  | Rosenblum, Rachel    | 1.40  | 283.50   | 94,326.75  | WO     | HD     | TR | _____ |
| 11/22/21   | 8648877 | Prepare for Winkler deposition (.2). Meeting with Geoff Winkler prior to deposition (2.0). attend Winkler deposition (7.0). Meeting with J Del Castillo re deposition (.4).  | Lloyd, Kevin         | 9.60  | 6,436.80 | 100,763.55 | WO     | HD     | TR | _____ |
| 11/23/21   | 8643102 | Review documents and confer with counsel and Receiver's office regarding outstanding discovery and litigation matters (1.9); prepare outline for motion to amend complaint (0.6); legal analysis in connection with same (0.6); confer with counsel regarding mediation brief (0.5); outline additional revisions to same (0.3).   | Del Castillo, Joshua | 3.90  | 2,509.65 | 103,273.20 | WO     | HD     | TR | _____ |
| 11/23/21   | 8648886 | Meetings with team re discovery (.8). Review deposition exhibits (.5). Review operating agreement (.3). Research for MB&T representative depositions (1.1). Emails with team re deposition transcripts (.2). Emails with receiver (.1). Emails with team re discovery (.6). Communications with team re additional complaint (.4). | Lloyd, Kevin         | 4.00  | 2,682.00 | 105,955.20 | WO     | HD     | TR | _____ |
| 11/24/21   | 8644244 | Emails with opposing counsel regarding outstanding discovery (0.1); review documents and file and attention to pending additional discovery issues (0.5); review and outline additional revisions to confidential mediation statement (0.6).   | Del Castillo, Joshua | 1.20  | 772.20   | 106,727.40 | WO     | HD     | TR | _____ |

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| 11/24/21          | 8646426      | Evaluate the Receiver draft mediation brief and revision to the same.   | Zaro, David          | 0.70         | 585.90      | 107,313.30 | WO            | HD            | TR | _____ |
| 11/24/21          | 8648891      | Emails with opposing counsel and team re discovery (.5). Call with J Del Castillo re discovery (.1).  | Lloyd, Kevin         | 0.60         | 402.30      | 107,715.60 | WO            | HD            | TR | _____ |
| 11/26/21          | 8645104      | Review and revise confidential mediation statement and emails to counsel regarding same (2.5); review correspondence regarding necessary discovery and document review (0.5).   | Del Castillo, Joshua | 3.00         | 1,930.50    | 109,646.10 | WO            | HD            | TR | _____ |
| 11/26/21          | 8648896      | Research on discovery issues (.4). Emails with team re discovery (.3).  | Lloyd, Kevin         | 0.70         | 469.35      | 110,115.45 | WO            | HD            | TR | _____ |
| 11/28/21          | 8645385      | Prepare additional revisions to CVL confidential mediation statement and transmit for review and comment (1.3).   | Del Castillo, Joshua | 1.30         | 836.55      | 110,952.00 | WO            | HD            | TR | _____ |
| 11/28/21          | 8648903      | Review draft mediation brief (.6). Emails with M Pham re discovery (.1).  | Lloyd, Kevin         | 7.00         | 4,693.50    | 115,645.50 | WO            | HD            | TR | _____ |
| 11/29/21          | 8646407      | Confer with counsel regarding CVL confidential mediation statement and prepare additional revisions to same (2.5); emails with Receiver's office regarding same (0.5); review materials provided by Receiver's office in connection with same and confer (1.0). | Del Castillo, Joshua | 4.00         | 2,574.00    | 118,219.50 | WO            | HD            | TR | _____ |
| 11/29/21          | 8646765      | document review for production (3.20).  | Rosenblum, Rachel    | 3.20         | 648.00      | 118,867.50 | WO            | HD            | TR | _____ |

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| 11/29/21          | 8648207      | Revise draft of the mediation brief, analysis of draft complaint (1.1). Several emails as to valuation and meeting to address the valuation of the CVL enterprise and damages (.8).   | Zaro, David          | 1.90         | 1,590.30    | 120,457.80 | WO            | HD            | TR | _____ |
| 11/29/21          | 8648999      | Emails with team with complaint (.1). Review complaint (1.1). Emails with counsel for Iannelli (.1). Emails with opposing counsel (.1). Meeting with Josh Del Castillo and David Zaro re mediation (.7). Emails with Receiver (.1). Emails with J Del Castillo re mediation brief (.1). Emails with team re valuation (.3). Call with J del Castillo re mediation (.2). Review research on evidence exclusion and email with team re same (.2). | Lloyd, Kevin         | 3.00         | 2,011.50    | 122,469.30 | WO            | HD            | TR | _____ |
| 11/29/21          | 8649460      | Review and analyze MB&T document production in preparation for depositions  | Pham, Matt D.        | 1.30         | 538.20      | 123,007.50 | WO            | HD            | TR | _____ |
| 11/29/21          | 8649461      | Continue reviewing MB&T document production in preparation for depositions  | Pham, Matt D.        | 1.10         | 455.40      | 123,462.90 | WO            | HD            | TR | _____ |
| 11/30/21          | 8647962      | Finalize Confidential Mediation Statement and assemble for transmittal to mediator (1.9); confer with counsel regarding additional complaint (0.2); confer regarding mediation (0.7).   | Del Castillo, Joshua | 2.80         | 1,801.80    | 125,264.70 | WO            | HD            | TR | _____ |
| 11/30/21          | 8648075      | document review for Fazio (3.1); confer with counsel regarding production (.6)  | Rosenblum, Rachel    | 3.70         | 749.25      | 126,013.95 | WO            | HD            | TR | _____ |
| 11/30/21          | 8649486      | Begin preparing deposition outlines for depositions of MB&T employees (1.3); continue reviewing MB&T document   | Pham, Matt D.        | 2.00         | 828.00      | 126,841.95 | WO            | HD            | TR | _____ |

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|            |         | production (0.7)  |                      |       |          |            |        |        |    |       |
| 11/30/21   | 8652929 | Emails with Rachel Rosenblum re evidence research (.1). Call with Matt Pham re draft motion (.1). Call with J Del Castillo re draft motion (.1). Research re CVL operating agreement (.8). Meeting with J Del Castillo re mediation (.5). Meeting with M Pham re depositions (.3). Communications with mediator (.5). Review revised complaint (.6) | Lloyd, Kevin         | 3.00  | 2,011.50 | 128,853.45 | WO     | HD     | TR | _____ |
| 12/01/21   | 8652966 | Emails and teleconferences regarding upcoming mediation (0.9); review responses to RFAs and confer with counsel regarding same (0.3).   | Del Castillo, Joshua | 1.20  | 772.20   | 129,625.65 | WO     | HD     | TR | _____ |
| 12/01/21   | 8659246 | Review and analyze MB&T document production for preparation of MB&T depositions   | Pham, Matt D.        | 1.70  | 703.80   | 130,329.45 | WO     | HD     | TR | _____ |
| 12/01/21   | 8659248 | Review and analyze MB&T document production of email communications involving Davin Mantell in preparation of Mantell's deposition  | Pham, Matt D.        | 1.50  | 621.00   | 130,950.45 | WO     | HD     | TR | _____ |
| 12/01/21   | 8659250 | Review and analyze MB&T document production of emails involving Michael Jarrells in preparation for Jarrells deposition   | Pham, Matt D.        | 1.30  | 538.20   | 131,488.65 | WO     | HD     | TR | _____ |
| 12/01/21   | 8659256 | Prepare outline for Mantell deposition  | Pham, Matt D.        | 2.00  | 828.00   | 132,316.65 | WO     | HD     | TR | _____ |
| 12/01/21   | 8659258 | Prepare outline for Jarrells deposition   | Pham, Matt D.        | 2.00  | 828.00   | 133,144.65 | WO     | HD     | TR | _____ |

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| 12/01/21          | 8675511      | Emails with team re depositions (.2). Communications with team re depositions (.9). Calls with Josh Del Castillo re discovery (.4). Emails with mediator (.3). Emails with opposing counsel re depositions (.2). Review RFA responses (.5). Emails with team re RFA responses (.2). | Lloyd, Kevin         | 2.70         | 1,810.35    | 134,955.00 | WO            | HD            | TR | _____ |
| 12/02/21          | 8654032      | Confer with counsel regarding mediation strategy and related matters (1.1); prepare for and attend pre-mediation conference call with mediator (1.5).   | Del Castillo, Joshua | 2.60         | 1,673.10    | 136,628.10 | WO            | HD            | TR | _____ |
| 12/02/21          | 8655188      | Several emails with Receiver counsel and advice related to depositions and discovery.   | Zaro, David          | 0.40         | 334.80      | 136,962.90 | WO            | HD            | TR | _____ |
| 12/02/21          | 8659262      | Prepare additional notes for Mantell deposition   | Pham, Matt D.        | 0.50         | 207.00      | 137,169.90 | WO            | HD            | TR | _____ |
| 12/02/21          | 8659263      | Attend and take deposition of Davin Mantell   | Pham, Matt D.        | 3.10         | 1,283.40    | 138,453.30 | WO            | HD            | TR | _____ |
| 12/02/21          | 8659264      | Prepare additional notes for Jarrells deposition  | Pham, Matt D.        | 0.60         | 248.40      | 138,701.70 | WO            | HD            | TR | _____ |
| 12/02/21          | 8659267      | Attend and take deposition of Michael Jarrells  | Pham, Matt D.        | 2.40         | 993.60      | 139,695.30 | WO            | HD            | TR | _____ |
| 12/02/21          | 8675515      | Emails with team re depositions (.3). Emails with opposing counsel (.3). Emails with mediator (.4). Emails with team re mediation (.2). Emails with receiver re valuation (.2). Prep for call with mediator (.5). Call with mediator (.8). Meetings with                            | Lloyd, Kevin         | 3.10         | 2,078.55    | 141,773.85 | WO            | HD            | TR | _____ |

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**Fees for Matter 378224.00013.(CVL Litigation (Winlker v. 915 Elm Avenu)**


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| <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> |    |       |
|-------------------|--------------|---|----------------------|--------------|-------------|------------|---------------|---------------|----|-------|
|                   |              | team re mediator call (.4).   |                      |              |             |            |               |               |    |       |
| 12/03/21          | 8655040      | Confer with counsel regarding mediation strategy (1.0); finalize redactions to mediation brief for potential transmittal to opposing counsel (0.5); prepare for and attend teleconference with D. Cousineau regarding mediation (1.0).  | Del Castillo, Joshua | 2.50         | 1,608.75    | 143,382.60 | WO            | HD            | TR | _____ |
| 12/03/21          | 8676470      | Emails with opposing counsel re call (.2). Emails with team re call with opposing counsel (.3). Prep for call with opposing counsel (.5). Meeting with Josh Del Castillo re call with opposing counsel (.3). Call with opposing counsel re mediation (.5). Calls with J Del Castillo re mediation (.1). Emails with mediator (.3). Emails with opposing counsel re discovery (.1). Emails with receiver re mediation (.3). Emails with receiver re discovery (.1). Emails with opposing counsel re mediation briefs (.2). | Lloyd, Kevin         | 2.90         | 1,944.45    | 145,327.05 | WO            | HD            | TR | _____ |
| 12/05/21          | 8655750      | Review pleadings and documents and prepare draft CVL settlement agreement in anticipation of mediation (2.1); emails to counsel regarding same (0.3).   | Del Castillo, Joshua | 2.40         | 1,544.40    | 146,871.45 | WO            | HD            | TR | _____ |
| 12/05/21          | 8664653      | Emails with team re research for pretrial motions (.3). Emails with team re mediation brief (.3). Emails with team re investment paperwork (.2). Emails re settlement agreement (.1). Research for mediation (.9).  | Lloyd, Kevin         | 1.80         | 1,206.90    | 148,078.35 | WO            | HD            | TR | _____ |
| 12/06/21          | 8656370      | research for mediation  | Rosenblum, Rachel    | 1.80         | 364.50      | 148,442.85 | WO            | HD            | TR | _____ |

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**Fees for Matter 378224.00013.(CVL Litigation (Winlker v. 915 Elm Avenu)**


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| <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> |    |       |
|-------------------|--------------|--|----------------------|--------------|-------------|------------|---------------|---------------|----|-------|
| 12/06/21          | 8656590      | Review CVL mediation brief and documents to controvert claims made therein (1.1); meet with counsel and Receiver to prepare for mediation (3.2); emails and teleconferences regarding supplemental legal analysis in connection with arguments presented in CVL mediation brief (1.0). | Del Castillo, Joshua | 5.30         | 3,410.55    | 151,853.40 | WO            | HD            | TR | _____ |
| 12/06/21          | 8658741      | Evaluate mediation briefs and settlement issues, follow-up with Receiver/counsel (.6). Meeting with Receiver and counsel related to the mediation, assess strategy (.3). Call with counsel to follow-up on the valuation methodology, site visit (.2).                                 | Zaro, David          | 1.10         | 920.70      | 152,774.10 | WO            | HD            | TR | _____ |
| 12/06/21          | 8659296      | Locate, review, and analyze documents from database relating to Reyner and related parties' early investments with Essex   | Pham, Matt D.        | 1.30         | 538.20      | 153,312.30 | WO            | HD            | TR | _____ |
| 12/06/21          | 8659299      | Review and analyze CVL's mediation brief   | Pham, Matt D.        | 0.40         | 165.60      | 153,477.90 | WO            | HD            | TR | _____ |
| 12/06/21          | 8664657      | Meeting with Receiver and team to prepare for mediation (3.5). Emails with team re research for pretrial motions (.5). Emails with team re discovery (.3).   | Lloyd, Kevin         | 4.30         | 2,883.15    | 156,361.05 | WO            | HD            | TR | _____ |
| 12/07/21          | 8657623      | Review and assemble documents and prepare for mediation with counsel (1.4); attend mediation (4.0).  | Del Castillo, Joshua | 5.40         | 3,474.90    | 159,835.95 | WO            | HD            | TR | _____ |
| 12/07/21          | 8658809      | Several calls with counsel/Receiver as to the mediation, settlement structure and follow-up.   | Zaro, David          | 0.40         | 334.80      | 160,170.75 | WO            | HD            | TR | _____ |



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**Fees for Matter 378224.00013.(CVL Litigation (Winlker v. 915 Elm Avenu)**


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| <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> |    |    |       |
|-------------------|--------------|--|----------------------|--------------|-------------|------------|----------------------|----|----|-------|
| 12/07/21          | 8664663      | Prepare for mediation (1.7). Attend Mediation (4.0).   | Lloyd, Kevin         | 5.70         | 3,821.85    | 163,992.60 | WO                   | HD | TR | _____ |
| 12/08/21          | 8658763      | Emails and teleconferences with counsel and Receiver's office regarding results of mediation and forthcoming litigation (1.6); review correspondence from mediator (0.1); prepare draft status report regarding mediation (0.6).   | Del Castillo, Joshua | 2.30         | 1,480.05    | 165,472.65 | WO                   | HD | TR | _____ |
| 12/08/21          | 8659953      | Evaluate the settlement negotiations, offers and strategy, call with Receiver counsel.   | Zaro, David          | 0.40         | 334.80      | 165,807.45 | WO                   | HD | TR | _____ |
| 12/08/21          | 8670695      | Confer with Josh del Castillo regarding outcome of CVL mediation and approach for new complaint against Reyner   | Pham, Matt D.        | 0.50         | 207.00      | 166,014.45 | WO                   | HD | TR | _____ |
| 12/08/21          | 8680295      | Emails with team re mediation (.3). Communications with team re mediation (1.1). Emails with opposing counsel re mediation (.3). Research for complaint against Reyner (1.6). Emails with team re Reyner complaint (.4).   | Lloyd, Kevin         | 3.70         | 2,480.85    | 168,495.30 | WO                   | HD | TR | _____ |
| 12/09/21          | 8660037      | Confer with D. Cousineau and finalize Joint Report regarding mediation and prepare for filing (0.5); review and respond to emails regarding proposed course of action to evaluate settlement and confer with Receiver's office regarding same (0.5); review MBT documents regarding CVL property appraisal and teleconference with counsel regarding same (0.6). | Del Castillo, Joshua | 1.60         | 1,029.60    | 169,524.90 | WO                   | HD | TR | _____ |
| 12/09/21          | 8680317      | Review depositions transcripts for bank witnesses and related exhibits (1.9). Emails   | Lloyd, Kevin         | 4.40         | 2,950.20    | 172,475.10 | WO                   | HD | TR | _____ |

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**Fees for Matter 378224.00013.(CVL Litigation (Winlker v. 915 Elm Avenu)**

| <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> |    |       |
|-------------------|--------------|---|----------------------|--------------|-------------|------------|---------------|---------------|----|-------|
|                   |              | with team re deposition exhibits (.8). Call with J De Castillo re exhibits (.2). Emails with opposing counsel and the receiver re discovery (.2). Emails with opposing counsel re joint report (.3). Communications with team re joint report (.2). Emails with team re filing joint report (.3). Emails with Receiver re CVL records (.2). Communications with team re complaint (.3). |                      |              |             |            |               |               |    |       |
| 12/10/21          | 8661433      | Review documents in connection with prospective settlement proposal and emails with counsel regarding same (1.3).   | Del Castillo, Joshua | 1.30         | 836.55      | 173,311.65 | WO            | HD            | TR | _____ |
| 12/10/21          | 8680329      | Emails with team re deposition exhibits (.4). Emails with opposing counsel re general ledger (.1). Communications with team re settlement (.3). Research for complaint (1.7).   | Lloyd, Kevin         | 2.50         | 1,676.25    | 174,987.90 | WO            | HD            | TR | _____ |
| 12/11/21          | 8662022      | Review correspondence from mediator and prepare inquiries to counsel regarding same (0.3); analysis of legal issues arising from CVL's failure to turn over responsive documents and review docket in connection with same (1.4).   | Del Castillo, Joshua | 1.70         | 1,093.95    | 176,081.85 | WO            | HD            | TR | _____ |
| 12/13/21          | 8663224      | Attention to prospective settlement issues and correspondence with Receiver's office regarding same (0.5); emails and confer with counsel regarding status of anticipated Reyner complaint (0.5).   | Del Castillo, Joshua | 1.00         | 643.50      | 176,725.35 | WO            | HD            | TR | _____ |
| 12/13/21          | 8680787      | Emails with Receiver re ledger (.2). Communications with team re settlement   | Lloyd, Kevin         | 2.10         | 1,408.05    | 178,133.40 | WO            | HD            | TR | _____ |

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**Fees for Matter 378224.00013.(CVL Litigation (Winlker v. 915 Elm Avenu)**


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| Trans Date | Index   | Description of Service Rendered  | Timekeeper           | Hours | Fees     | Sum        | Circle | Action |    |       |
|------------|---------|--|----------------------|-------|----------|------------|--------|--------|----|-------|
|            |         | (.3). Research for complaint (1.6).  |                      |       |          |            |        |        |    |       |
| 12/14/21   | 8664488 | Emails with Receiver and mediator regarding status if transmittal of CVL GL (0.3).   | Del Castillo, Joshua | 0.30  | 193.05   | 178,326.45 | WO     | HD     | TR | _____ |
| 12/14/21   | 8680794 | Emails with team re requests for production (.3). Emails with Receiver (.6). Communications with team re ledger (.3). Emails with mediator (.1). Emails with team re ledger (.1). Meetings with team re litigation strategy (.5).  | Lloyd, Kevin         | 1.90  | 1,273.95 | 179,600.40 | WO     | HD     | TR | _____ |
| 12/15/21   | 8665973 | Review and respond to correspondence from D. Cousineau and confer with K. Lloyd regarding Cousineau request for extended deadlines, including trial deadline (0.5); confer with M. Pham regarding status of second Reyner complaint and review associated materials (0.3).                       | Del Castillo, Joshua | 0.80  | 514.80   | 180,115.20 | WO     | HD     | TR | _____ |
| 12/15/21   | 8680834 | Emails with opposing counsel re general ledger and briefing schedule (.3). Review pre-trial schedule (.2). Emails with team re complaint (.2). Communications with team re complaint (.2). Communications with team re ledger (.3). Research for complaint (1.4).                                | Lloyd, Kevin         | 2.60  | 1,743.30 | 181,858.50 | WO     | HD     | TR | _____ |
| 12/16/21   | 8667083 | Review and prepare initial recommended revisions to Reyner complaint and confer with counsel regarding same (1.3); review and respond to correspondence regarding CVL failure to provide audit log for general ledger and prepare request to mediator and opposing counsel regarding same (0.3). | Del Castillo, Joshua | 1.60  | 1,029.60 | 182,888.10 | WO     | HD     | TR | _____ |

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**Fees for Matter 378224.00013.(CVL Litigation (Winlker v. 915 Elm Avenu)**


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| <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> |    |       |
|-------------------|--------------|---|----------------------|--------------|-------------|------------|---------------|---------------|----|-------|
| 12/16/21          | 8669726      | Research/analysis related to prospective damage claims against managing member, the draft complaint and follow-up (1.2). Evaluate the further prospective causes of action, email and meeting with counsel to advise as to complaint and strategy (1.1).  | Zaro, David          | 2.30         | 1,925.10    | 184,813.20 | WO            | HD            | TR | _____ |
| 12/16/21          | 8683772      | Emails with team re complaint (.4). Emails with receiver (.2). Emails with mediator (.1). Emails with team re briefing schedule (.1). Communications with opposing counsel re briefing schedule (.3). Review team edits to complaint (.5). Review operating agreement (.4). Communications with team re complaint (.3). | Lloyd, Kevin         | 2.30         | 1,542.15    | 186,355.35 | WO            | HD            | TR | _____ |
| 12/17/21          | 8668232      | Confer with CVL counsel and Receiver regarding Receiver's request for audit log in connection with production of general ledger (0.5); confer with counsel regarding proposed additional revisions to draft Reyner complaint (0.5).   | Del Castillo, Joshua | 1.00         | 643.50      | 186,998.85 | WO            | HD            | TR | _____ |
| 12/17/21          | 8683804      | Emails with Receiver re audit log (.4). Emails with team re audit log (.3). Communications with team re settlement discussions (.6). Review complaint (.9).   | Lloyd, Kevin         | 2.20         | 1,475.10    | 188,473.95 | WO            | HD            | TR | _____ |
| 12/18/21          | 8669649      | Emails with counsel regarding prospective settlement issues and review and respond to correspondence from D. Cousineau regarding case administration deadlines (0.9).   | Del Castillo, Joshua | 0.90         | 579.15      | 189,053.10 | WO            | HD            | TR | _____ |

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**Fees for Matter 378224.00013.(CVL Litigation (Winlker v. 915 Elm Avenu)**


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| <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> |    |       |
|-------------------|--------------|--|----------------------|--------------|-------------|------------|---------------|---------------|----|-------|
| 12/18/21          | 8675546      | Emails with opposing counsel.  | Lloyd, Kevin         | 0.30         | 201.15      | 189,254.25 | WO            | HD            | TR | _____ |
| 12/20/21          | 8675548      | Editing draft complaint (1.7). Emails with opposing counsel and mediator re production of ledger (.3). Emails with opposing counsel re discovery schedule (.2).  | Lloyd, Kevin         | 2.20         | 1,475.10    | 190,729.35 | WO            | HD            | TR | _____ |
| 12/21/21          | 8671781      | Review draft CVL stipulation to extend deadlines and confer with D. Cousineau regarding same (0.3).  | Del Castillo, Joshua | 0.30         | 193.05      | 190,922.40 | WO            | HD            | TR | _____ |
| 12/21/21          | 8676476      | Emails with opposing counsel re discovery schedule.  | Lloyd, Kevin         | 0.30         | 201.15      | 191,123.55 | WO            | HD            | TR | _____ |
| 12/22/21          | 8672633      | Review and confer regarding anticipated CVL production of native quickbooks files (0.5).   | Del Castillo, Joshua | 0.50         | 321.75      | 191,445.30 | WO            | HD            | TR | _____ |
| 12/22/21          | 8676092      | Several emails related to the CVL accounting (.2). Emails concerning lanelli's interaction with Reyner and Wolansky (.2).  | Zaro, David          | 0.40         | 334.80      | 191,780.10 | WO            | HD            | TR | _____ |
| 12/22/21          | 8676478      | Emails with opposing counsel re ledger (.3). Emails with team re ledger (.4). Review stipulation (.2). Emails with mediator re ledger (.1). review discovery (.4). Emails with team re discovery (.3). | Lloyd, Kevin         | 1.70         | 1,139.85    | 192,919.95 | WO            | HD            | TR | _____ |
| 12/27/21          | 8680376      | Communications with team re litigation strategy (.4).  | Lloyd, Kevin         | 0.40         | 268.20      | 193,188.15 | WO            | HD            | TR | _____ |
| 12/28/21          | 8676009      | Emails and confer regarding CVL Quickbooks file and necessary password (0.2); confer with counsel regarding  | Del Castillo, Joshua | 0.50         | 321.75      | 193,509.90 | WO            | HD            | TR | _____ |

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**Fees for Matter 378224.00013.(CVL Litigation (Winlker v. 915 Elm Avenu)**


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| Trans Date | Index   | Description of Service Rendered   | Timekeeper   | Hours | Fees   | Sum        | Circle | Action |    |       |
|------------|---------|---|--------------|-------|--------|------------|--------|--------|----|-------|
|            |         | prospective settlement and associated strategy issues (0.3).  |              |       |        |            |        |        |    |       |
| 12/28/21   | 8676864 | Follow-up on settlement discussions, valuation and advice to counsel as to Receiver response (.4). Assess Court's order and prospective expert issues (.3). | Zaro, David  | 0.70  | 585.90 | 194,095.80 | WO     | HD     | TR | _____ |
| 12/28/21   | 8680563 | Emails with receiver and opposing counsel re CVL books (.5). Emails with team re CVL books (.6). Emails with team and receiver re CVL valuation (.3)        | Lloyd, Kevin | 1.40  | 938.70 | 195,034.50 | WO     | HD     | TR | _____ |

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**Disbursements for Matter 378224.00013 (CVL Litigation (Winlker v. 915 Elm Avenu)**


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| Trans Date | Index   | Type  | Quantity | Amt      | Circle | Action |    |       |
|------------|---------|---|----------|----------|--------|--------|----|-------|
| 10/01/21   | 2746766 | DCSRCH – Document Search - - PACER - 7/21 -9/21 Usage                                 | 0.00     | 0.80     | WO     | HD     | TR | _____ |
| 10/14/21   | 2736582 | BW – Duplication - Black & White Copies   | 110.00   | 20.90    | WO     | HD     | TR | _____ |
| 10/30/21   | 2738822 | DEPO – Veritext, LLC - Deposition Transcript of James Gally Taken on 10/15/2021       | 0.00     | 2,043.65 | WO     | HD     | TR | _____ |
| 11/02/21   | 2741873 | MEDIT – Signature Resolution LLC - 50% of Full Day Mediation on 12/07/2021            | 0.00     | 6,450.00 | WO     | HD     | TR | _____ |
| 11/16/21   | 2740915 | BW – Duplication - Black & White Copies   | 147.00   | 27.93    | WO     | HD     | TR | _____ |
| 11/22/21   | 2741871 | MLA – Mendocino Farms - Depo  | 0.00     | 105.27   | WO     | HD     | TR | _____ |
| 11/22/21   | 2741872 | DEPO – Corner Bakery Cafe - Depo  | 0.00     | 145.00   | WO     | HD     | TR | _____ |
| 11/23/21   | 2743052 | DEPO – Veritext, LLC - Deposition Transcript of William S. Reyner Taken on 11/18/2021 | 0.00     | 3,160.25 | WO     | HD     | TR | _____ |
| 11/23/21   | 2745888 | MLA – -Gabrielle Fischer 002182,CORNER BAKERY 0185-                                   | 0.00     | 155.00   | WO     | HD     | TR | _____ |

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**Disbursements for Matter 378224.00013 (CVL Litigation (Winkler v. 915 Elm Avenu)**

| Trans Date | Index   | Type  | Quantity | Amt      |    |    |    |       |
|------------|---------|---|----------|----------|----|----|----|-------|
| 11/23/21   | 2745889 | Breakfast order for client Meeting with Geoff Winkler.<br>MLA – -Gabrielle Fischer 002182,MENDOCINO FARMS 6<br>ONLINE-Lunch order for client Meeting with Geoff Winkler (\$10<br>tip not reflected on receipt). | 0.00     | 105.27   | WO | HD | TR | _____ |
| 11/30/21   | 2742923 | BW – Duplication - Black & White Copies   | 163.00   | 30.97    | WO | HD | TR | _____ |
| 11/30/21   | 2742924 | COLOR – Duplication - Color Copies  | 271.00   | 67.75    | WO | HD | TR | _____ |
| 11/30/21   | 2743565 | MSNGR – Federal Express - Ship To: Alisa Martinez, Case<br>Administr - Signature Resolution   | 0.00     | 15.11    | WO | HD | TR | _____ |
| 12/02/21   | 2743168 | BW – Duplication - Black & White Copies   | 153.00   | 29.07    | WO | HD | TR | _____ |
| 12/06/21   | 2743349 | BW – Duplication - Black & White Copies   | 120.00   | 22.80    | WO | HD | TR | _____ |
| 12/08/21   | 2745707 | DEPO – Veritext, LLC - Deposition Transcript of Geoff Winkler<br>Taken on 11/22/2021  | 0.00     | 1,679.75 | WO | HD | TR | _____ |
| 12/16/21   | 2744973 | DEPO – Veritext, LLC - Video - Digitizing & Transcript<br>Synchronization of Geoff Winkler Taken on 11/22/2021  | 0.00     | 800.00   | WO | HD | TR | _____ |
| 12/17/21   | 2745706 | DEPO – Veritext, LLC - Video Services for William S. Reyner<br>Taken on 11/18/2021  | 0.00     | 1,463.00 | WO | HD | TR | _____ |
| 12/22/21   | 2747711 | DEPO – Veritext, LLC - Deposition Transcript of Davin Mantell<br>and Michael Jarrells Taken on 12/02/2021   | 0.00     | 1,465.85 | WO | HD | TR | _____ |

**Proforma Summary**

**Timekeeper**

| Number | Timekeeper           | Hours  | Rate   | Amounts      |
|--------|----------------------|--------|--------|--------------|
| 000313 | Zaro, David          | 12.30  | 837.00 | 10,295.10    |
| 001842 | Del Castillo, Joshua | 87.60  | 643.50 | 56,370.60    |
| 002369 | Aspis, Norman        | 14.60  | 445.50 | 6,504.30     |
| 002444 | Rosenblum, Rachel    | 12.10  | 202.50 | 2,450.25     |
| 002448 | Neglia, Ross         | 0.70   | 315.00 | 220.50       |
| 002493 | Lloyd, Kevin         | 161.90 | 670.50 | 108,553.95   |
| 002510 | Pham, Matt D.        | 25.70  | 414.00 | 10,639.80    |
|        |                      | 314.90 |        | \$195,034.50 |
|        | Subtotal Fees        |        |        | \$195,034.50 |
|        | Discount             |        |        | 0.00         |

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**Proforma Summary**

**Timekeeper**

| Number | Timekeeper          | Hours | Rate | Amounts    |
|--------|---------------------|-------|------|------------|
|        | Total Fees          |       |      | 195,034.50 |
|        | Total Disbursements |       |      | 17,788.37  |

**Attorney Billing Instructions**

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

**Billing Instructions**

expires 6/30/2022: 10% off standard rates (automatic)

**Account Summary – As Of 01/28/22**

|                             | Fiscal YTD        |                   |                  | Calendar YTD |            |       | LTD        |            |               |
|-----------------------------|-------------------|-------------------|------------------|--------------|------------|-------|------------|------------|---------------|
|                             | Total             | Fees              | Disb.            | Total        | Fees       | Disb. | Total      | Fees       | Disbursements |
| Worked                      | 388,744.65        | 388,744.65        | 0.00             | 14,156.10    | 14,156.10  | 0.00  | 452,504.27 | 434,637.00 | 17,867.27     |
| Unbilled Adj                | 4,178.61          | 4,178.61          | 0.00             | 0.00         | 0.00       | 0.00  | 7,294.41   | 7,294.41   | 0.00          |
| Billed                      | 148,792.84        | 148,739.76        | 53.08            | 115,711.95   | 115,678.26 | 33.69 | 158,454.81 | 158,454.81 | 78.90         |
| Collected                   | 148,792.84        | 148,739.76        | 53.08            | 115,711.95   | 115,678.26 | 33.69 | 158,533.71 | 158,454.81 | 78.90         |
| AR Write Off                | 0.00              | 0.00              | 0.00             | 0.00         | 0.00       | 0.00  | 0.00       | 0.00       | 0.00          |
| <b>WIP Balance</b>          | <b>286,736.73</b> | <b>268,902.00</b> | <b>17,834.73</b> |              |            |       |            |            |               |
| <b>AR Balance</b>           | <b>0.00</b>       | <b>0.00</b>       | <b>0.00</b>      |              |            |       |            |            |               |
| <b>Unalloc Payment</b>      | <b>0.00</b>       |                   |                  |              |            |       |            |            |               |
| <b>Client Trust Balance</b> | <b>0.00</b>       |                   |                  |              |            |       |            |            |               |

**Billing Address**

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



01/28/22 16:45:55 PROFORMA STATEMENT FOR MATTER 378224.00013 (Winkler, Geoff/Receiver for Essex Capita) (CVL Litigation (Winkler v. 915 Elm Avenu)

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

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}  
01/28/22 16:45:58 PROFORMA STATEMENT FOR MATTER 378224.00014 (Winkler, Geoff/Receiver for Essex Capita) (Fazio Litigation)

**Preliminary Billing Form**

Billing Atty: 001842 - Del Castillo, Matter #: 378224.00014 Client Name: Winkler, Geoff/Receiver for Essex Capita  
 Joshua  
 Date of Last Billing: 01/11/22 Matter Name: Fazio Litigation  
 Proforma Number: 1135905  
 Client/Matter Joint Group # 378224-1

**Fees for Matter 378224.00014.(Fazio Litigation)**

| Trans Date | Index   | Description of Service Rendered   | Timekeeper           | Hours | Fees     | Sum      | Circle | Action |    |       |
|------------|---------|---|----------------------|-------|----------|----------|--------|--------|----|-------|
| 10/04/21   | 8589635 | Review documents in connection with prospective settlement and offer of judgment; confer with counsel and Receiver's office regarding same (2.0).   | Del Castillo, Joshua | 2.00  | 1,287.00 | 1,287.00 | WO     | HD     | TR | _____ |
| 10/04/21   | 8591769 | Several emails related to the Fazio Litigation and settlement.  | Zaro, David          | 0.40  | 334.80   | 1,621.80 | WO     | HD     | TR | _____ |
| 10/06/21   | 8591800 | Review documents and email and teleconferences with counsel and Receiver's office regarding anticipated rejection of offer of judgment (1.0); email to counsel for Fazios regarding rejection of offer of judgment (0.1). | Del Castillo, Joshua | 1.10  | 707.85   | 2,329.65 | WO     | HD     | TR | _____ |
| 11/02/21   | 8621736 | Review and confer regarding Fazio written discovery (1.2).  | Del Castillo, Joshua | 1.20  | 772.20   | 3,101.85 | WO     | HD     | TR | _____ |
| 11/09/21   | 8628962 | Review Fazio written discovery requests and confer with opposing counsel regarding proposed extension (0.9); commence preparation of responses (0.3); correspondence to Receiver regarding                                | Del Castillo, Joshua | 1.40  | 900.90   | 4,002.75 | WO     | HD     | TR | _____ |

01/28/22 16:45:58 PROFORMA STATEMENT FOR MATTER 378224.00014 (Winkler, Geoff/Receiver for Essex Capita) (Fazio Litigation)

**Fees for Matter 378224.00014.(Fazio Litigation)**

| Trans Date | Index   | Description of Service Rendered   | Timekeeper           | Hours | Fees     | Sum      | Circle | Action |    |       |
|------------|---------|---|----------------------|-------|----------|----------|--------|--------|----|-------|
|            |         | proposed document production (0.2).   |                      |       |          |          |        |        |    |       |
| 11/10/21   | 8629723 | Emails with opposing counsel and counsel regarding discovery deadlines (0.5); prepare initial draft of responses to Fazio RFAs, Set One, and deliver to counsel and Receiver for review and comment (1.4); review materials transmitted by Receiver in connection with anticipated document production (0.5). | Del Castillo, Joshua | 2.40  | 1,544.40 | 5,547.15 | WO     | HD     | TR | _____ |
| 11/22/21   | 8641956 | Prepare responses to Requests for Production of Documents (1.1); confer with counsel and Receiver's office regarding status of document review and assembly for production (0.5).   | Del Castillo, Joshua | 1.60  | 1,029.60 | 6,576.75 | WO     | HD     | TR | _____ |
| 11/28/21   | 8645388 | Review draft discovery responses and revise RFA and request for production of documents responses, and draft outline for ROG responses (1.1).   | Del Castillo, Joshua | 1.10  | 707.85   | 7,284.60 | WO     | HD     | TR | _____ |
| 11/29/21   | 8646590 | Complete revisions to written discovery responses and transmit to Receiver for review and approval (1.1); emails and teleconference regarding status of document review for production (0.7); review and assemble additional materials for anticipated production (0.3).                                      | Del Castillo, Joshua | 2.10  | 1,351.35 | 8,635.95 | WO     | HD     | TR | _____ |
| 11/29/21   | 8648302 | PREPARE SUPPLEMENTAL PRODUCTION OF FAZIO DOCUMENTS  | Neglia, Ross         | 1.00  | 315.00   | 8,950.95 | WO     | HD     | TR | _____ |
| 11/30/21   | 8648184 | Emails and teleconference with R. Rosenblum regarding document production and attention to outstanding discovery  | Del Castillo, Joshua | 1.10  | 707.85   | 9,658.80 | WO     | HD     | TR | _____ |

01/28/22 16:45:58 PROFORMA STATEMENT FOR MATTER 378224.00014 (Winkler, Geoff/Receiver for Essex Capita) (Fazio Litigation)

**Fees for Matter 378224.00014.(Fazio 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> |    |       |
|-------------------|--------------|--|----------------------|--------------|-------------|------------|---------------|---------------|----|-------|
| 12/01/21          | 8651385      | Finalize discovery responses and secure authority to serve from Receiver (0.5); teleconferences and emails regarding document review and production (0.7); transmit discovery responses in PDF form to opposing counsel (0.1). | Del Castillo, Joshua | 1.30         | 836.55      | 10,495.35  | WO            | HD            | TR | _____ |
| 12/01/21          | 8653303      | document review for Fazio production (2.5); confer with counsel for production (.6)  | Rosenblum, Rachel    | 3.10         | 627.75      | 11,123.10  | WO            | HD            | TR | _____ |
| 12/01/21          | 8656304      | PERFORM QC ON DRAFT PRODUCTION AND CONFER WITH R. ROSENBLUM regarding SAME   | Neglia, Ross         | 1.10         | 346.50      | 11,469.60  | WO            | HD            | TR | _____ |
| 12/02/21          | 8653990      | review responsive documents (1.2); confer with counsel (.4); confer with tech team for production (.8)   | Rosenblum, Rachel    | 2.40         | 486.00      | 11,955.60  | WO            | HD            | TR | _____ |
| 12/02/21          | 8654033      | Attention to document production issues in connection with outstanding discovery requests; emails and teleconference with counsel regarding same (1.1).  | Del Castillo, Joshua | 1.10         | 707.85      | 12,663.45  | WO            | HD            | TR | _____ |
| 12/02/21          | 8656509      | FINALIZE AND TRANSMIT DOCUMENT PRODUCTION TO DEFENDANTS  | Neglia, Ross         | 1.40         | 441.00      | 13,104.45  | WO            | HD            | TR | _____ |
| 12/20/21          | 8670122      | Review meet and confer letter and analysis of arguments presented by Fazio counsel; attention to issues regarding discovery (1.1).   | Del Castillo, Joshua | 1.10         | 707.85      | 13,812.30  | WO            | HD            | TR | _____ |
| 12/23/21          | 8674925      | Review and respond to email demand from N. Wentworth, confer with counsel and Receiver's office regarding supplemental   | Del Castillo, Joshua | 1.50         | 965.25      | 14,777.55  | WO            | HD            | TR | _____ |

01/28/22 16:45:58 PROFORMA STATEMENT FOR MATTER 378224.00014 (Winkler, Geoff/Receiver for Essex Capita) (Fazio Litigation)

**Fees for Matter 378224.00014.(Fazio Litigation)**

| Trans Date | Index   | Description of Service Rendered  | Timekeeper           | Hours | Fees     | Sum       | Circle | Action |    |       |
|------------|---------|--|----------------------|-------|----------|-----------|--------|--------|----|-------|
|            |         | discovery, and additional analysis in connection with discovery dispute (1.5).   |                      |       |          |           |        |        |    |       |
| 12/23/21   | 8682008 | Continue drafting set of requests for production, requests for admission, and interrogatories to Joseph Fazio  | Pham, Matt D.        | 1.90  | 786.60   | 15,564.15 | WO     | HD     | TR | _____ |
| 12/26/21   | 8674936 | Legal analysis in connection with anticipated depositions and motion for summary adjudication; emails to counsel regarding same (2.4).                               | Del Castillo, Joshua | 2.40  | 1,544.40 | 17,108.55 | WO     | HD     | TR | _____ |
| 12/27/21   | 8675131 | Complete additional analysis of legal issues and commence preparation of formal response to meet and confer letter (1.5).  | Del Castillo, Joshua | 1.50  | 965.25   | 18,073.80 | WO     | HD     | TR | _____ |
| 12/27/21   | 8682031 | Continue drafting requests for production to Joseph Fazio  | Pham, Matt D.        | 0.70  | 289.80   | 18,363.60 | WO     | HD     | TR | _____ |
| 12/27/21   | 8682032 | Continue drafting requests for admission and interrogatories to Joseph Fazio   | Pham, Matt D.        | 0.70  | 289.80   | 18,653.40 | WO     | HD     | TR | _____ |
| 12/29/21   | 8682102 | Review and analyze original response to Fazio's requests for production; begin drafting amended response to such requests in light of Fazio's meet and confer letter | Pham, Matt D.        | 1.50  | 621.00   | 19,274.40 | WO     | HD     | TR | _____ |
| 12/30/21   | 8678246 | Review memorandum from R. Rosenblum regarding document production and emails regarding same (0.5); attention to response to meet and confer demand (0.2).            | Del Castillo, Joshua | 0.70  | 450.45   | 19,724.85 | WO     | HD     | TR | _____ |

**Disbursements for Matter 378224.00014 (Fazio Litigation)**

01/28/22 16:45:58 PROFORMA STATEMENT FOR MATTER 378224.00014 (Winkler, Geoff/Receiver for Essex Capita) (Fazio Litigation)

| Trans Date | Index   | Type  | Quantity | Amt  | WO | HD | TR |       |
|------------|---------|---|----------|------|----|----|----|-------|
| 10/01/21   | 2746786 | DCSRCH – Document Search - - PACER - 7/21 -9/21 Usage | 0.00     | 0.10 |    |    |    | _____ |
| 10/01/21   | 2746787 | DCSRCH – Document Search - - PACER - 7/21 -9/21 Usage | 0.00     | 0.50 |    |    |    | _____ |

**Proforma Summary**

**Timekeeper**

| Number              | Timekeeper           | Hours | Rate   | Amounts     |
|---------------------|----------------------|-------|--------|-------------|
| 000313              | Zaro, David          | 0.40  | 837.00 | 334.80      |
| 001842              | Del Castillo, Joshua | 23.60 | 643.50 | 15,186.60   |
| 002444              | Rosenblum, Rachel    | 5.50  | 202.50 | 1,113.75    |
| 002448              | Neglia, Ross         | 3.50  | 315.00 | 1,102.50    |
| 002510              | Pham, Matt D.        | 4.80  | 414.00 | 1,987.20    |
|                     |                      | 37.80 |        | \$19,724.85 |
| Subtotal Fees       |                      |       |        | \$19,724.85 |
| Discount            |                      |       |        | 0.00        |
| Total Fees          |                      |       |        | 19,724.85   |
| Total Disbursements |                      |       |        | 0.60        |

**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 6/30/2022: 10% off standard rates (automatic)

**Account Summary – As Of 01/28/22**

|              | Fiscal YTD |           |       | Calendar YTD |           |       | LTD       |           |               |
|--------------|------------|-----------|-------|--------------|-----------|-------|-----------|-----------|---------------|
|              | Total      | Fees      | Disb. | Total        | Fees      | Disb. | Total     | Fees      | Disbursements |
| Worked       | 61,065.45  | 61,065.45 | 0.00  | 17,641.80    | 17,641.80 | 0.00  | 70,561.05 | 70,547.85 | 13.20         |
| Unbilled Adj | 0.00       | 0.00      | 0.00  | 0.00         | 0.00      | 0.00  | 0.00      | 0.00      | 0.00          |
| Billed       | 31,206.60  | 31,194.00 | 12.60 | 21,711.60    | 21,711.60 | 0.00  | 31,194.00 | 31,194.00 | 12.60         |
| Collected    | 31,206.60  | 31,194.00 | 12.60 | 21,711.60    | 21,711.60 | 0.00  | 31,206.60 | 31,194.00 | 12.60         |
| AR Write Off | 0.00       | 0.00      | 0.00  | 0.00         | 0.00      | 0.00  | 0.00      | 0.00      | 0.00          |

01/28/22 16:45:58 PROFORMA STATEMENT FOR MATTER 378224.00014 (Winkler, Geoff/Receiver for Essex Capita) (Fazio Litigation)

|                     | <i>Total</i>     | <i>Fees</i>      | <i>Costs</i> |
|---------------------|------------------|------------------|--------------|
| <i>WIP</i>          | <b>39,354.45</b> | <b>39,353.85</b> | <b>0.60</b>  |
| <i>Balance</i>      |                  |                  |              |
| <i>AR Balance</i>   | <b>0.00</b>      | <b>0.00</b>      | <b>0.00</b>  |
| <i>Unalloc</i>      | <b>0.00</b>      |                  |              |
| <i>Payment</i>      |                  |                  |              |
| <i>Client Trust</i> | <b>0.00</b>      |                  |              |
| <i>Balance</i>      |                  |                  |              |

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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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01/28/22 16:45:59 PROFORMA STATEMENT FOR MATTER 378224.00016 (Winkler, Geoff/Receiver for Essex Capita) (Siemens Litigation)

**Preliminary Billing Form**

Billing Atty: 001842 - Del Castillo, Joshua  
 Date of Last Billing: 01/11/22  
 Proforma Number: 1135905  
 Client/Matter Joint Group # 378224-1

Matter #: 378224.00016  
 Client Name: Winkler, Geoff/Receiver for Essex Capita  
 Matter Name: Siemens Litigation

**Fees for Matter 378224.00016.(Siemens Litigation)**

| Trans Date | Index   | Description of Service Rendered  | Timekeeper           | Hours | Fees   | Sum      | Circle | Action |
|------------|---------|--|----------------------|-------|--------|----------|--------|--------|
| 12/20/21   | 8681947 | Review and analyze filings from case; begin drafting discovery requests on Siemens defendants  | Pham, Matt D.        | 0.60  | 248.40 | 248.40   | WO     | HD TR  |
| 12/29/21   | 8676948 | Review file and attention to litigation administration matters (0.5); emails with Receiver's office and counsel (0.5); review accounting and attention to issues regarding same (0.3). | Del Castillo, Joshua | 1.30  | 836.55 | 1,084.95 | WO     | HD TR  |

**Proforma Summary**

| Timekeeper Number   | Timekeeper           | Hours       | Rate   | Amounts           |
|---------------------|----------------------|-------------|--------|-------------------|
| 001842              | Del Castillo, Joshua | 1.30        | 643.50 | 836.55            |
| 002510              | Pham, Matt D.        | 0.60        | 414.00 | 248.40            |
|                     |                      | <u>1.90</u> |        | <u>\$1,084.95</u> |
| Subtotal Fees       |                      |             |        | \$1,084.95        |
| Discount            |                      |             |        | 0.00              |
| Total Fees          |                      |             |        | 1,084.95          |
| Total Disbursements |                      |             |        | 0.00              |



01/28/22 16:45:59 PROFORMA STATEMENT FOR MATTER 378224.00016 (Winkler, Geoff/Receiver for Essex Capita) (Siemens Litigation)

**Attorney Billing Instructions**

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

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**Billing Instructions**

|   |
|---|
| expires 6/30/2022: 10% off standard rates (automatic) |
|---|

**Account Summary – As Of 01/28/22**

|                             | Fiscal YTD      |                 |              | Calendar YTD |          |       | LTD      |          |               |
|-----------------------------|-----------------|-----------------|--------------|--------------|----------|-------|----------|----------|---------------|
|                             | Total           | Fees            | Disb.        | Total        | Fees     | Disb. | Total    | Fees     | Disbursements |
| Worked                      | 5,207.40        | 5,207.40        | 0.00         | 1,930.50     | 1,930.50 | 0.00  | 5,474.70 | 5,474.70 | 0.00          |
| Unbilled Adj                | 0.00            | 0.00            | 0.00         | 0.00         | 0.00     | 0.00  | 0.00     | 0.00     | 0.00          |
| Billed                      | 2,459.25        | 2,459.25        | 0.00         | 2,191.95     | 2,191.95 | 0.00  | 2,459.25 | 2,459.25 | 0.00          |
| Collected                   | 2,459.25        | 2,459.25        | 0.00         | 2,191.95     | 2,191.95 | 0.00  | 2,459.25 | 2,459.25 | 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 Balance</b>          | <b>3,015.45</b> | <b>3,015.45</b> | <b>0.00</b>  |              |          |       |          |          |               |
| <b>AR Balance</b>           | <b>0.00</b>     | <b>0.00</b>     | <b>0.00</b>  |              |          |       |          |          |               |
| <b>Unalloc Payment</b>      | <b>0.00</b>     |                 |              |              |          |       |          |          |               |
| <b>Client Trust Balance</b> | <b>0.00</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

}  
 01/28/22 16:46:00 PROFORMA STATEMENT FOR MATTER 378224.00017 (Winkler, Geoff/Receiver for Essex Capita) (Fead Litigation)

**Preliminary Billing Form**

Billing Atty: 001842 - Del Castillo, Matter #: 378224.00017 Client Name: Winkler, Geoff/Receiver for Essex Capita  
 Joshua  
 Date of Last Billing: 01/11/22 Matter Name: Fead Litigation  
 Proforma Number: 1135905  
 Client/Matter Joint Group # 378224-1

**Fees for Matter 378224.00017.(Fead Litigation)**

| Trans Date | Index   | Description of Service Rendered   | Timekeeper           | Hours | Fees     | Sum      | WO | HD | TR | Action |
|------------|---------|---|----------------------|-------|----------|----------|----|----|----|--------|
| 10/06/21   | 8594345 | Evaluate lawsuit, defenses and several emails, call to counsel regarding motion issues and Receiver's strategy.   | Zaro, David          | 0.40  | 334.80   | 334.80   | WO | HD | TR | _____  |
| 12/09/21   | 8670750 | Review and analyze pleadings and other filings in Fead action (0.5); begin drafting requests for production and requests for admission against Fead (1.3) | Pham, Matt D.        | 1.80  | 745.20   | 1,080.00 | WO | HD | TR | _____  |
| 12/21/21   | 8671029 | Review and prepare recommended revisions to written discovery templates (2.2).  | Del Castillo, Joshua | 2.20  | 1,415.70 | 2,495.70 | WO | HD | TR | _____  |
| 12/21/21   | 8681986 | Confer with Joshua del Castillo regarding discovery requests  | Pham, Matt D.        | 0.20  | 82.80    | 2,578.50 | WO | HD | TR | _____  |
| 12/21/21   | 8681988 | Revise set of discovery requests in light of comments by Josh del Castillo  | Pham, Matt D.        | 0.50  | 207.00   | 2,785.50 | WO | HD | TR | _____  |
| 12/23/21   | 8682007 | Revise and finalize set of requests for production, requests for admission, and interrogatories to Beverlye Hyman Fead                                    | Pham, Matt D.        | 1.60  | 662.40   | 3,447.90 | WO | HD | TR | _____  |

01/28/22 16:46:00 PROFORMA STATEMENT FOR MATTER 378224.00017 (Winkler, Geoff/Receiver for Essex Capita) (Fead Litigation)

**Fees for Matter 378224.00017.(Fead Litigation)**

| Trans Date | Index   | Description of Service Rendered   | Timekeeper           | Hours | Fees   | Sum      | Circle | Action |
|------------|---------|---|----------------------|-------|--------|----------|--------|--------|
| 12/28/21   | 8676260 | Review documents and additional analysis regarding prospective motion for summary adjudication; emails to Receiver's office regarding accounting and related inquiries (0.8). | Del Castillo, Joshua | 0.80  | 514.80 | 3,962.70 | WO     | HD TR  |
| 12/29/21   | 8676947 | Review file and attention to litigation administration matters (0.5); emails with Receiver's office and counsel (0.5).  | Del Castillo, Joshua | 1.00  | 643.50 | 4,606.20 | WO     | HD TR  |

**Proforma Summary**

| Timekeeper Number   | Timekeeper           | Hours       | Rate   | Amounts           |
|---------------------|----------------------|-------------|--------|-------------------|
| 000313              | Zaro, David          | 0.40        | 837.00 | 334.80            |
| 001842              | Del Castillo, Joshua | 4.00        | 643.50 | 2,574.00          |
| 002510              | Pham, Matt D.        | 4.10        | 414.00 | 1,697.40          |
|                     |                      | <u>8.50</u> |        | <u>\$4,606.20</u> |
| Subtotal Fees       |                      |             |        | \$4,606.20        |
| Discount            |                      |             |        | 0.00              |
| Total Fees          |                      |             |        | 4,606.20          |
| 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 6/30/2022: 10% off standard rates (automatic)

**Account Summary – As Of 01/28/22**

Fiscal YTD                      Calendar YTD                      LTD

01/28/22 16:46:00 PROFORMA STATEMENT FOR MATTER 378224.00017 (Winkler, Geoff/Receiver for Essex Capita) (Fead Litigation)

|                     | Total            | Fees             | Disb.        | Total    | Fees     | Disb. | Total     | Fees      | Disbursements |
|---------------------|------------------|------------------|--------------|----------|----------|-------|-----------|-----------|---------------|
| Worked              | 13,656.60        | 13,656.60        | 0.00         | 7,271.55 | 7,271.55 | 0.00  | 14,235.75 | 14,235.75 | 0.00          |
| Unbilled Adj        | 0.00             | 0.00             | 0.00         | 0.00     | 0.00     | 0.00  | 0.00      | 0.00      | 0.00          |
| Billed              | 2,358.00         | 2,358.00         | 0.00         | 1,778.85 | 1,778.85 | 0.00  | 2,358.00  | 2,358.00  | 0.00          |
| Collected           | 2,358.00         | 2,358.00         | 0.00         | 1,778.85 | 1,778.85 | 0.00  | 2,358.00  | 2,358.00  | 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>11,877.75</b> | <b>11,877.75</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>      |                  |                  |              |          |          |       |           |           |               |

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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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 01/28/22 16:46:02 PROFORMA STATEMENT FOR MATTER 378224.00018 (Winkler, Geoff/Receiver for Essex Capita) (Largura Litigation)

**Preliminary Billing Form**

Billing Atty: 001842 - Del Castillo, Matter #: 378224.00018 Client Name: Winkler, Geoff/Receiver for Essex Capita  
 Joshua  
 Date of Last Billing: 01/11/22 Matter Name: Largura Litigation  
 Proforma Number: 1135905  
 Client/Matter Joint Group # 378224-1

**Fees for Matter 378224.00018.(Largura Litigation)**

| Trans Date | Index   | Description of Service Rendered   | Timekeeper           | Hours | Fees   | Sum      | Circle | Action |    |       |
|------------|---------|---|----------------------|-------|--------|----------|--------|--------|----|-------|
| 10/06/21   | 8618531 | Prepare for and participate teleconference regarding joint report in Largura matter (.8).   | Aspis, Norman        | 0.80  | 356.40 | 356.40   | WO     | HD     | TR | _____ |
| 10/12/21   | 8618651 | Review, revise, and finalize Joint Report (.4).   | Aspis, Norman        | 0.40  | 178.20 | 534.60   | WO     | HD     | TR | _____ |
| 12/28/21   | 8676262 | Review documents and additional analysis regarding prospective motion for summary adjudication; emails to Receiver's office regarding accounting and related inquiries (0.8). | Del Castillo, Joshua | 0.80  | 514.80 | 1,049.40 | WO     | HD     | TR | _____ |
| 12/29/21   | 8676950 | Review file and attention to litigation administration matters (0.5); emails with Receiver's office and counsel (0.5); emails regarding Initial Disclosures (0.3).            | Del Castillo, Joshua | 1.30  | 836.55 | 1,885.95 | WO     | HD     | TR | _____ |

**Proforma Summary**

| Timekeeper Number | Timekeeper           | Hours | Rate   | Amounts  |
|-------------------|----------------------|-------|--------|----------|
| 001842            | Del Castillo, Joshua | 2.10  | 643.50 | 1,351.35 |

01/28/22 16:46:02 PROFORMA STATEMENT FOR MATTER 378224.00018 (Winkler, Geoff/Receiver for Essex Capita) (Largura Litigation)

**Proforma Summary**

**Timekeeper**

| Number              | Timekeeper    | Hours       | Rate   | Amounts           |
|---------------------|---------------|-------------|--------|-------------------|
| 002369              | Aspis, Norman | 1.20        | 445.50 | 534.60            |
|                     |               | <u>3.30</u> |        | <u>\$1,885.95</u> |
| Subtotal Fees       |               |             |        | \$1,885.95        |
| Discount            |               |             |        | 0.00              |
| Total Fees          |               |             |        | 1,885.95          |
| Total Disbursements |               |             |        | 0.00              |

**Attorney Billing Instructions**

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

**Billing Instructions**

expires 6/30/2022: 10% off standard rates (automatic)

**Account Summary – As Of 01/28/22**

|                     | Fiscal YTD      |                 |             | Calendar YTD |          |       | LTD      |          |               |
|---------------------|-----------------|-----------------|-------------|--------------|----------|-------|----------|----------|---------------|
|                     | Total           | Fees            | Disb.       | Total        | Fees     | Disb. | Total    | Fees     | Disbursements |
| Worked              | 4,711.05        | 4,711.05        | 0.00        | 1,737.45     | 1,737.45 | 0.00  | 5,651.60 | 5,646.60 | 5.00          |
| Unbilled Adj        | 0.00            | 0.00            | 0.00        | 0.00         | 0.00     | 0.00  | 0.00     | 0.00     | 0.00          |
| Billed              | 2,028.20        | 2,023.20        | 5.00        | 1,092.65     | 1,087.65 | 5.00  | 2,023.20 | 2,023.20 | 5.00          |
| Collected           | 2,028.20        | 2,023.20        | 5.00        | 1,092.65     | 1,087.65 | 5.00  | 2,028.20 | 2,023.20 | 5.00          |
| 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>3,623.40</b> | <b>3,623.40</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>      |                 |                 |             |              |          |       |          |          |               |

01/28/22 16:46:02 PROFORMA STATEMENT FOR MATTER 378224.00018 (Winkler, Geoff/Receiver for Essex Capita) (Largura Litigation)

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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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01/28/22 16:46:03 PROFORMA STATEMENT FOR MATTER 378224.00019 (Winkler, Geoff/Receiver for Essex Capita) (Hopen Litigation)

**Preliminary Billing Form**

Billing Atty: 001842 - Del Castillo, Matter #: 378224.00019 Client Name: Winkler, Geoff/Receiver for Essex Capita  
 Joshua  
 Date of Last Billing: Matter Name: Hopen Litigation  
 Proforma Number: 1135905  
 Client/Matter Joint Group # 378224-1

**Fees for Matter 378224.00019.(Hopen Litigation)**

| Trans Date | Index   | Description of Service Rendered   | Timekeeper           | Hours | Fees     | Sum      | Circle | Action |    |       |
|------------|---------|---|----------------------|-------|----------|----------|--------|--------|----|-------|
| 11/26/21   | 8648617 | Review correspondence from opposing counsel regarding waiver of service and review notes and file history (0.6); prepare inquiries to counsel (0.3).  | Del Castillo, Joshua | 0.90  | 579.15   | 579.15   | WO     | HD     | TR | _____ |
| 12/14/21   | 8664616 | Review demand letter and exhibits from Hopen counsel and confer with D. Zaro and M. Pham regarding same; review documents in connection with disgorgement claim against Hopen (1.7); analysis of defenses raised in Hopen correspondence, and prepare response to same (0.7). | Del Castillo, Joshua | 2.40  | 1,544.40 | 2,123.55 | WO     | HD     | TR | _____ |
| 12/14/21   | 8670821 | Perform legal research regarding one-year discovery rule and draft recitation of applicable case law for inclusion in response letter to opposing counsel   | Pham, Matt D.        | 0.40  | 165.60   | 2,289.15 | WO     | HD     | TR | _____ |
| 12/15/21   | 8665972 | Complete analysis of arguments raised by Hopen counsel in demand letter and confer with counsel regarding same (1.5).   | Del Castillo, Joshua | 1.50  | 965.25   | 3,254.40 | WO     | HD     | TR | _____ |



01/28/22 16:46:03 PROFORMA STATEMENT FOR MATTER 378224.00019 (Winkler, Geoff/Receiver for Essex Capita) (Hopen Litigation)

**Fees for Matter 378224.00019.(Hopen Litigation)**

| Trans Date | Index   | Description of Service Rendered   | Timekeeper           | Hours | Fees     | Sum      | Circle | Action |    |       |
|------------|---------|---|----------------------|-------|----------|----------|--------|--------|----|-------|
| 12/16/21   | 8666958 | Teleconference with counsel for Hopen regarding litigation and attention to case administration and anticipated statute of limitations argument and discovery matters (1.7).          | Del Castillo, Joshua | 1.70  | 1,093.95 | 4,348.35 | WO     | HD     | TR | _____ |
| 12/17/21   | 8668230 | Review and revise stipulation to extend time for Defendant to respond to FAC (0.3); confer with counsel regarding litigation administration issues (0.2).                             | Del Castillo, Joshua | 0.50  | 321.75   | 4,670.10 | WO     | HD     | TR | _____ |
| 12/17/21   | 8670845 | Draft stipulation regarding extension of time to file response to complaint and proposed order approving such stipulation; draft email to opposing counsel regarding such stipulation | Pham, Matt D.        | 1.40  | 579.60   | 5,249.70 | WO     | HD     | TR | _____ |

**Proforma Summary**

**Timekeeper**

| Number              | Timekeeper           | Hours       | Rate   | Amounts           |
|---------------------|----------------------|-------------|--------|-------------------|
| 001842              | Del Castillo, Joshua | 7.00        | 643.50 | 4,504.50          |
| 002510              | Pham, Matt D.        | 1.80        | 414.00 | 745.20            |
|                     |                      | <u>8.80</u> |        | <u>\$5,249.70</u> |
| Subtotal Fees       |                      |             |        | \$5,249.70        |
| Discount            |                      |             |        | 0.00              |
| Total Fees          |                      |             |        | 5,249.70          |
| 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**

01/28/22 16:46:03 PROFORMA STATEMENT FOR MATTER 378224.00019 (Winkler, Geoff/Receiver for Essex Capita) (Hopen Litigation)

expires 6/30/2022: 10% off standard rates (automatic)

**Account Summary – As Of 01/28/22**

|                             | Fiscal YTD      |                 |              | Calendar YTD |      |       | LTD      |          |               |
|-----------------------------|-----------------|-----------------|--------------|--------------|------|-------|----------|----------|---------------|
|                             | Total           | Fees            | Disb.        | Total        | Fees | Disb. | Total    | Fees     | Disbursements |
| Worked                      | 5,378.40        | 5,378.40        | 0.00         | 0.00         | 0.00 | 0.00  | 5,378.40 | 5,378.40 | 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 Balance</b>          | <b>5,378.40</b> | <b>5,378.40</b> | <b>0.00</b>  |              |      |       |          |          |               |
| <b>AR Balance</b>           | <b>0.00</b>     | <b>0.00</b>     | <b>0.00</b>  |              |      |       |          |          |               |
| <b>Unalloc Payment</b>      | <b>0.00</b>     |                 |              |              |      |       |          |          |               |
| <b>Client Trust Balance</b> | <b>0.00</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

}  
 01/28/22 16:46:04 PROFORMA STATEMENT FOR MATTER 378224.00020 (Winkler, Geoff/Receiver for Essex Capita) (Nicholson Litigation)

**Preliminary Billing Form**

Billing Atty: 001842 - Del Castillo, Matter #: 378224.00020 Client Name: Winkler, Geoff/Receiver for Essex Capita  
 Joshua  
 Date of Last Billing: Matter Name: Nicholson Litigation  
 Proforma Number: 1135905  
 Client/Matter Joint Group # 378224-1

**Fees for Matter 378224.00020.(Nicholson Litigation)**

| Trans Date | Index   | Description of Service Rendered   | Timekeeper  | Hours | Fees   | Sum      | Circle | Action |    |       |
|------------|---------|---|-------------|-------|--------|----------|--------|--------|----|-------|
| 10/26/21   | 8612683 | Evalute the draft revisions to the amended complaint, advice to counsel as to complaint (.6). | Zaro, David | 0.60  | 502.20 | 502.20   | WO     | HD     | TR | _____ |
| 11/24/21   | 8646423 | Analysis of Nicholson jurisdiction/venue questions raised by defense counsel.                 | Zaro, David | 0.30  | 251.10 | 753.30   | WO     | HD     | TR | _____ |
| 11/29/21   | 8648205 | Several emails/call with counsel related to Nicholson matter/jurisdiction.                    | Zaro, David | 0.30  | 251.10 | 1,004.40 | WO     | HD     | TR | _____ |
| 12/20/21   | 8671565 | Analysis of Receiver's claims, calls with Receiver and Mr. Napoli related to settlement.      | Zaro, David | 0.40  | 334.80 | 1,339.20 | WO     | HD     | TR | _____ |

**Proforma Summary**

| Timekeeper Number | Timekeeper  | Hours | Rate   | Amounts    |
|-------------------|-------------|-------|--------|------------|
| 000313            | Zaro, David | 1.60  | 837.00 | 1,339.20   |
|                   |             | 1.60  |        | \$1,339.20 |
| Subtotal Fees     |             |       |        | \$1,339.20 |
| Discount          |             |       |        | 0.00       |

01/28/22 16:46:04 PROFORMA STATEMENT FOR MATTER 378224.00020 (Winkler, Geoff/Receiver for Essex Capita) (Nicholson Litigation)

**Proforma Summary**

**Timekeeper**

| Number              | Timekeeper | Hours | Rate | Amounts  |
|---------------------|------------|-------|------|----------|
| Total Fees          |            |       |      | 1,339.20 |
| Total Disbursements |            |       |      | 0.00     |

**Attorney Billing Instructions**

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

**Billing Instructions**

expires 6/30/2022: 10% off standard rates (automatic)

**Account Summary – As Of 01/28/22**

|                             | Fiscal YTD      |                 |             | Calendar YTD |      |       | LTD      |          |               |
|-----------------------------|-----------------|-----------------|-------------|--------------|------|-------|----------|----------|---------------|
|                             | Total           | Fees            | Disb.       | Total        | Fees | Disb. | Total    | Fees     | Disbursements |
| Worked                      | 1,339.20        | 1,339.20        | 0.00        | 0.00         | 0.00 | 0.00  | 1,339.20 | 1,339.20 | 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>WIP Balance</b>          | <b>1,339.20</b> | <b>1,339.20</b> | <b>0.00</b> |              |      |       |          |          |               |
| <b>AR Balance</b>           | <b>0.00</b>     | <b>0.00</b>     | <b>0.00</b> |              |      |       |          |          |               |
| <b>Unalloc Payment</b>      | <b>0.00</b>     |                 |             |              |      |       |          |          |               |
| <b>Client Trust Balance</b> | <b>0.00</b>     |                 |             |              |      |       |          |          |               |

**Billing Address**

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

01/28/22 16:46:04 PROFORMA STATEMENT FOR MATTER 378224.00020 (Winkler, Geoff/Receiver for Essex Capita) (Nicholson Litigation)

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

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01/28/22 16:46:05 PROFORMA STATEMENT FOR MATTER 378224.00021 (Winkler, Geoff/Receiver for Essex Capita) (Reyner Litigation)

**Preliminary Billing Form**

Billing Atty: 001842 - Del Castillo, Matter #: 378224.00021 Client Name: Winkler, Geoff/Receiver for Essex Capita  
 Joshua  
 Date of Last Billing: Matter Name: Reyner Litigation  
 Proforma Number: 1135905  
 Client/Matter Joint Group # 378224-1

**Fees for Matter 378224.00021.(Reyner Litigation)**

| Trans Date | Index   | Description of Service Rendered  | Timekeeper           | Hours | Fees   | Sum      | Circle | Action |    |       |
|------------|---------|--|----------------------|-------|--------|----------|--------|--------|----|-------|
| 10/04/21   | 8591779 | (Reyner) Conferences with counsel as to the Reyner action/address next steps, coordination with CVL action.                              | Zaro, David          | 0.40  | 334.80 | 334.80   | WO     | HD     | TR | _____ |
| 10/06/21   | 8594342 | (Reyner) Work with counsel related to the amended complaint, pending hearing and procedural issues.                                      | Zaro, David          | 0.30  | 251.10 | 585.90   | WO     | HD     | TR | _____ |
| 10/20/21   | 8608210 | Conferences with counsel as to the Reyner matter, the discovery and early meeting of counsel.  | Zaro, David          | 0.40  | 334.80 | 920.70   | WO     | HD     | TR | _____ |
| 11/02/21   | 8623398 | Follow-up with counsel, analysis/advice as to Reyner discovery and coordinate with CVL discovery.  | Zaro, David          | 0.40  | 334.80 | 1,255.50 | WO     | HD     | TR | _____ |
| 11/15/21   | 8635744 | Evaluate the Reyner claims, the Receiver accounting to assess settlement and follow-up emails as to the meet and confer/Rule 26 meeting. | Zaro, David          | 0.60  | 502.20 | 1,757.70 | WO     | HD     | TR | _____ |
| 11/18/21   | 8638544 | Review and revise draft 26(f) Report (0.6).  | Del Castillo, Joshua | 0.60  | 386.10 | 2,143.80 | WO     | HD     | TR | _____ |

01/28/22 16:46:05 PROFORMA STATEMENT FOR MATTER 378224.00021 (Winkler, Geoff/Receiver for Essex Capita) (Reyner Litigation)

**Fees for Matter 378224.00021.(Reyner Litigation)**

| Trans Date | Index   | Description of Service Rendered   | Timekeeper           | Hours | Fees   | Sum      | Circle | Action |    |       |
|------------|---------|---|----------------------|-------|--------|----------|--------|--------|----|-------|
| 11/24/21   | 8646415 | Follow-up on issues related to the Reyner accounting/claim and call with counsel (.4). Revisions to Rule 26 joint report and emails related to the matter (.4). | Zaro, David          | 0.80  | 669.60 | 2,813.40 | WO     | HD     | TR | _____ |
| 11/26/21   | 8647901 | Evaluate Reyner testimony and the fraudulent conveyance issues, follow-up to analyze the Reyner claims.   | Zaro, David          | 1.10  | 920.70 | 3,734.10 | WO     | HD     | TR | _____ |
| 12/01/21   | 8653063 | Emails and attention to Reyner litigation administration matters (0.5).   | Del Castillo, Joshua | 0.50  | 321.75 | 4,055.85 | WO     | HD     | TR | _____ |
| 12/01/21   | 8655172 | Call with Receiver counsel and work on draft of the FRCP 26 report, follow-up email with Reyner's counsel.  | Zaro, David          | 0.60  | 502.20 | 4,558.05 | WO     | HD     | TR | _____ |
| 12/02/21   | 8663270 | Call with Receiver/counsel related to Reyner claims and settlement prospects to address possible accounting/compromise.   | Zaro, David          | 0.40  | 334.80 | 4,892.85 | WO     | HD     | TR | _____ |
| 12/03/21   | 8655156 | prepare initial disclosures   | Rosenblum, Rachel    | 0.20  | 40.50  | 4,933.35 | WO     | HD     | TR | _____ |
| 12/06/21   | 8656495 | draft initial disclosures   | Rosenblum, Rachel    | 1.30  | 263.25 | 5,196.60 | WO     | HD     | TR | _____ |
| 12/08/21   | 8659960 | Several emails/call with counsel to address Reyner disclosures, address the accounting production and follow-up.  | Zaro, David          | 0.60  | 502.20 | 5,698.80 | WO     | HD     | TR | _____ |
| 12/09/21   | 8661091 | Review the Court's Case Management order related to the Reyner case, the timing issues, call with counsel to address discovery and approach to experts.         | Zaro, David          | 0.60  | 502.20 | 6,201.00 | WO     | HD     | TR | _____ |

01/28/22 16:46:05 PROFORMA STATEMENT FOR MATTER 378224.00021 (Winkler, Geoff/Receiver for Essex Capita) (Reyner Litigation)

**Fees for Matter 378224.00021.(Reyner Litigation)**

| Trans Date | Index   | Description of Service Rendered  | Timekeeper  | Hours | Fees   | Sum      | Circle | Action |
|------------|---------|--|-------------|-------|--------|----------|--------|--------|
| 12/16/21   | 8669733 | Follow-up on the Rule 26 disclosures from Mr. Reyner, assess discovery issues, next steps with regard to timing and coordination of discovery. | Zaro, David | 0.40  | 334.80 | 6,535.80 | WO     | HD TR  |
| 12/20/21   | 8671597 | Analysis of Reyner claims and defenses to the Receiver's fraudulent conveyance claims, settlement and brief call with Receiver and counsel.    | Zaro, David | 0.30  | 251.10 | 6,786.90 | WO     | HD TR  |

**Proforma Summary**

| Timekeeper Number   | Timekeeper           | Hours       | Rate   | Amounts           |
|---------------------|----------------------|-------------|--------|-------------------|
| 000313              | Zaro, David          | 6.90        | 837.00 | 5,775.30          |
| 001842              | Del Castillo, Joshua | 1.10        | 643.50 | 707.85            |
| 002444              | Rosenblum, Rachel    | 1.50        | 202.50 | 303.75            |
|                     |                      | <u>9.50</u> |        | <u>\$6,786.90</u> |
| Subtotal Fees       |                      |             |        | \$6,786.90        |
| Discount            |                      |             |        | 0.00              |
| Total Fees          |                      |             |        | 6,786.90          |
| 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 6/30/2022: 10% off standard rates (automatic)

**Account Summary – As Of 01/28/22**

Fiscal YTD                      Calendar YTD                      LTD



01/28/22 16:46:05 PROFORMA STATEMENT FOR MATTER 378224.00021 (Winkler, Geoff/Receiver for Essex Capita) (Reyner Litigation)

|                     | Total           | Fees            | Disb.        | Total  | Fees   | Disb. | Total    | Fees     | Disbursements |
|---------------------|-----------------|-----------------|--------------|--------|--------|-------|----------|----------|---------------|
| Worked              | 7,628.40        | 7,628.40        | 0.00         | 386.10 | 386.10 | 0.00  | 7,628.40 | 7,628.40 | 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>7,628.40</b> | <b>7,628.40</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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01/28/22 16:46:06 PROFORMA STATEMENT FOR MATTER 378224.00022 (Winkler, Geoff/Receiver for Essex Capita) (Emmons Litigation)

**Preliminary Billing Form**

Billing Atty: 001842 - Del Castillo, Matter #: 378224.00022 Client Name: Winkler, Geoff/Receiver for Essex Capita  
 Joshua  
 Date of Last Billing: Matter Name: Emmons Litigation  
 Proforma Number: 1135905  
 Client/Matter Joint Group # 378224-1

**Fees for Matter 378224.00022.(Emmons Litigation)**

| Trans Date | Index   | Description of Service Rendered  | Timekeeper  | Hours | Fees     | Sum      | Circle | Action |    |
|------------|---------|--|-------------|-------|----------|----------|--------|--------|----|
| 12/07/21   | 8658826 | Emails related to the Emmons' claims, follow-up regarding same.  | Zaro, David | 0.20  | 167.40   | 167.40   | WO     | HD     | TR |
| 12/20/21   | 8671519 | Research/analysis as to the Emmons claim, work on development of settlement strategy as to Emmons (.1.2). Several calls with counsel and Mr. Napoli, follow-up (.3). | Zaro, David | 1.50  | 1,255.50 | 1,422.90 | WO     | HD     | TR |

**Proforma Summary**

| Timekeeper Number   | Timekeeper  | Hours | Rate   | Amounts    |
|---------------------|-------------|-------|--------|------------|
| 000313              | Zaro, David | 1.70  | 837.00 | 1,422.90   |
|                     |             | 1.70  |        | \$1,422.90 |
| Subtotal Fees       |             |       |        | \$1,422.90 |
| Discount            |             |       |        | 0.00       |
| Total Fees          |             |       |        | 1,422.90   |
| Total Disbursements |             |       |        | 0.00       |

**Attorney Billing Instructions**

( ) BILL ALL ( ) Hold

01/28/22 16:46:06 PROFORMA STATEMENT FOR MATTER 378224.00022 (Winkler, Geoff/Receiver for Essex Capita) (Emmons Litigation)

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

**Billing Instructions**

expires 6/30/2022: 10% off standard rates (automatic)

**Account Summary – As Of 01/28/22**

|                             | Fiscal YTD      |                 |              | Calendar YTD |      |       | LTD      |          |               |
|-----------------------------|-----------------|-----------------|--------------|--------------|------|-------|----------|----------|---------------|
|                             | Total           | Fees            | Disb.        | Total        | Fees | Disb. | Total    | Fees     | Disbursements |
| Worked                      | 1,422.90        | 1,422.90        | 0.00         | 0.00         | 0.00 | 0.00  | 1,422.90 | 1,422.90 | 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 Balance</b>          | <b>1,422.90</b> | <b>1,422.90</b> | <b>0.00</b>  |              |      |       |          |          |               |
| <b>AR Balance</b>           | <b>0.00</b>     | <b>0.00</b>     | <b>0.00</b>  |              |      |       |          |          |               |
| <b>Unalloc Payment</b>      | <b>0.00</b>     |                 |              |              |      |       |          |          |               |
| <b>Client Trust Balance</b> | <b>0.00</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

}

01/28/22 16:46:09 PROFORMA STATEMENT FOR MATTER 378224.00023 (Winkler, Geoff/Receiver for Essex Capita) (McCloskey Litigation)

**Preliminary Billing Form**

Billing Atty: 001842 - Del Castillo,  
Joshua

Matter #: 378224.00023

Client Name: Winkler, Geoff/Receiver for Essex Capita

Date of Last Billing:

Matter Name: McCloskey Litigation

Proforma Number: 1135905

Client/Matter Joint Group # 378224-1

**Fees for Matter 378224.00023.(McCloskey Litigation)**

| Trans Date | Index   | Description of Service Rendered   | Timekeeper           | Hours | Fees   | Sum      | Circle | Action |    |       |
|------------|---------|---|----------------------|-------|--------|----------|--------|--------|----|-------|
| 10/01/21   | 8618496 | Confer with counsel regarding filing First Amended Complaint (.4).  | Aspis, Norman        | 0.40  | 178.20 | 178.20   | WO     | HD     | TR | _____ |
| 10/04/21   | 8591777 | (McCloskey) Review/evaluate and revision the McCloskey complaint/accounting and follow-up regarding same.                         | Zaro, David          | 0.70  | 585.90 | 764.10   | WO     | HD     | TR | _____ |
| 10/04/21   | 8618498 | Review, edit, finalize, and file the First Amended Complaint and confer with counsel regarding the same (.5).                     | Aspis, Norman        | 0.50  | 222.75 | 986.85   | WO     | HD     | TR | _____ |
| 10/05/21   | 8592100 | (McCloskey) Evalute/revise amended complaint against McCloskey and advice to counsel.   | Zaro, David          | 0.40  | 334.80 | 1,321.65 | WO     | HD     | TR | _____ |
| 10/06/21   | 8594340 | (McCloskey) Call/email with counsel regarding arbitration/motion to dismiss as to amended complaint and follow-up regarding same. | Zaro, David          | 0.40  | 334.80 | 1,656.45 | WO     | HD     | TR | _____ |
| 10/18/21   | 8602830 | Review Amended McCloskey Motion to Dismiss and confer with counsel regarding same (1.1).  | Del Castillo, Joshua | 1.10  | 707.85 | 2,364.30 | WO     | HD     | TR | _____ |

01/28/22 16:46:09 PROFORMA STATEMENT FOR MATTER 378224.00023 (Winkler, Geoff/Receiver for Essex Capita) (McCloskey Litigation)

**Fees for Matter 378224.00023.(McCloskey Litigation)**

| Trans Date | Index   | Description of Service Rendered  | Timekeeper           | Hours | Fees     | Sum      | Circle | Action |    |       |
|------------|---------|--|----------------------|-------|----------|----------|--------|--------|----|-------|
| 10/19/21   | 8604271 | Complete additional analysis in connection with anticipated Opposition to Motion to Dismiss and revise outline accordingly (1.5); commence preparation of Opposition (0.9).            | Del Castillo, Joshua | 2.40  | 1,544.40 | 3,908.70 | WO     | HD     | TR | _____ |
| 10/19/21   | 8606831 | Analysis of the McCloskey motion to change venue and to compel arbitration, follow-up on the Receiver response.  | Zaro, David          | 0.60  | 502.20   | 4,410.90 | WO     | HD     | TR | _____ |
| 10/20/21   | 8606057 | Review and analyze McCloskey defendants' amended motion to dismiss, Ord declaration, and two agreements  | Pham, Matt D.        | 0.50  | 207.00   | 4,617.90 | WO     | HD     | TR | _____ |
| 10/20/21   | 8606064 | Perform legal research regarding document authentication; begin drafting insert for opposition to McCloskey defendants' motion to dismiss regarding inadmissibility of two agreements  | Pham, Matt D.        | 1.60  | 662.40   | 5,280.30 | WO     | HD     | TR | _____ |
| 10/21/21   | 8607211 | Research regarding the arbitrability of fraudulent transfer claims in Colorado state court (1.9).  | Rosenblum, Rachel    | 1.90  | 384.75   | 5,665.05 | WO     | HD     | TR | _____ |
| 10/21/21   | 8607280 | Confer with counsel regarding additional legal research required in connection with Opposition to Motion to Dismiss; legal analysis in connection with same (0.6).                     | Del Castillo, Joshua | 0.60  | 386.10   | 6,051.15 | WO     | HD     | TR | _____ |
| 10/21/21   | 8608295 | Perform additional research regarding personal knowledge required for document authentication; continue drafting argument regarding inadmissibility of McCloskey defendants' documents | Pham, Matt D.        | 0.80  | 331.20   | 6,382.35 | WO     | HD     | TR | _____ |

01/28/22 16:46:09 PROFORMA STATEMENT FOR MATTER 378224.00023 (Winkler, Geoff/Receiver for Essex Capita) (McCloskey Litigation)

**Fees for Matter 378224.00023.(McCloskey 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> |    |       |
|-------------------|--------------|--|----------------------|--------------|-------------|------------|---------------|---------------|----|-------|
| 10/22/21          | 8608049      | Confer with counsel regarding additions to Opposition to Motion to Dismiss and prepare revisions to same (1.5).  | Del Castillo, Joshua | 1.50         | 965.25      | 7,347.60   | WO            | HD            | TR | _____ |
| 10/22/21          | 8608304      | Perform legal research regarding arbitrability of CUFTA claims/fraudulent transfer claims under Colorado law   | Pham, Matt D.        | 1.50         | 621.00      | 7,968.60   | WO            | HD            | TR | _____ |
| 10/25/21          | 8609891      | Complete Opposition to McCloskey Motion to Dismiss and confer with counsel regarding same (1.3).   | Del Castillo, Joshua | 1.30         | 836.55      | 8,805.15   | WO            | HD            | TR | _____ |
| 10/25/21          | 8612645      | Evaluate/revise Receiver's opposition to McCloskey motion to compel arbitration (.4). Call with counsel related to McCloskey motion and advice as to opposition (.2).  | Zaro, David          | 0.60         | 502.20      | 9,307.35   | WO            | HD            | TR | _____ |
| 10/26/21          | 8611932      | Prepare Zaro Decl ISO Opposition to Motion to Dismiss (0.1); emails with counsel regarding Opposition (0.3).   | Del Castillo, Joshua | 0.40         | 257.40      | 9,564.75   | WO            | HD            | TR | _____ |
| 10/27/21          | 8615510      | Draft/revise Zaro declaration in support of Opposition to Motion to Dismiss, further revisions to the Opposition brief (.8). Emails to counsel as to McCloskey brief/complaint and call with Receiver and counsel regarding same (.3). | Zaro, David          | 1.10         | 920.70      | 10,485.45  | WO            | HD            | TR | _____ |
| 11/04/21          | 8628590      | Several emails/calls with counsel and McCloskey counsel related to claim, response and settlement.   | Zaro, David          | 0.40         | 334.80      | 10,820.25  | WO            | HD            | TR | _____ |
| 11/05/21          | 8630063      | Prepare for/attend meet and confer with counsel for McCloskey as to arbitration, case and settlement.  | Zaro, David          | 0.60         | 502.20      | 11,322.45  | WO            | HD            | TR | _____ |

01/28/22 16:46:09 PROFORMA STATEMENT FOR MATTER 378224.00023 (Winkler, Geoff/Receiver for Essex Capita) (McCloskey Litigation)

**Fees for Matter 378224.00023.(McCloskey 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> |    |       |
|-------------------|--------------|---|----------------------|--------------|-------------|------------|---------------|---------------|----|-------|
| 11/12/21          | 8632820      | Review Amended McCloskey Motion to Dismiss and confer with counsel regarding same (0.8); analysis of additional arguments in connection with anticipated, revised Opposition (0.9). | Del Castillo, Joshua | 1.70         | 1,093.95    | 12,416.40  | WO            | HD            | TR | _____ |
| 11/15/21          | 8634770      | Additional legal analysis in connection with Second Amended Motion to Dismiss (0.7); review and revise outline for Opposition to same (0.7).  | Del Castillo, Joshua | 1.40         | 900.90      | 13,317.30  | WO            | HD            | TR | _____ |
| 11/15/21          | 8635689      | Work with counsel related to the Receiver's opposition to motion related to arbitration and follow-up.  | Zaro, David          | 0.60         | 502.20      | 13,819.50  | WO            | HD            | TR | _____ |
| 11/16/21          | 8635912      | Complete initial draft of Opposition to Second Amended Motion to Dismiss and confer with counsel regarding same (2.4).  | Del Castillo, Joshua | 2.40         | 1,544.40    | 15,363.90  | WO            | HD            | TR | _____ |
| 11/16/21          | 8637021      | Research/analysis related to the McCloskey claim/arbitration motion and follow-up on draft opposition/call with Receiver counsel.   | Zaro, David          | 0.70         | 585.90      | 15,949.80  | WO            | HD            | TR | _____ |
| 11/16/21          | 8638649      | research regarding prosecution of fraudulent transfer claims  | Rosenblum, Rachel    | 0.50         | 101.25      | 16,051.05  | WO            | HD            | TR | _____ |
| 11/18/21          | 8638569      | Review and substantially revise draft 26(f) report and confer with counsel regarding same (0.6).  | Del Castillo, Joshua | 0.60         | 386.10      | 16,437.15  | WO            | HD            | TR | _____ |
| 11/18/21          | 8640017      | Work related to the Rule 26 meeting/draft report and follow-up call with counsel.   | Zaro, David          | 0.30         | 251.10      | 16,688.25  | WO            | HD            | TR | _____ |
| 11/21/21          | 8640960      | Finalize Opposition to Motion to Dismiss and prepare for filing (0.7).  | Del Castillo, Joshua | 0.70         | 450.45      | 17,138.70  | WO            | HD            | TR | _____ |

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**Fees for Matter 378224.00023.(McCloskey 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> |    |       |
|-------------------|--------------|--|----------------------|--------------|-------------|------------|---------------|---------------|----|-------|
| 11/23/21          | 8646368      | Email/call with counsel related to Rule 26 conference, address the case issues and timing, follow-up regarding same.   | Zaro, David          | 0.80         | 669.60      | 17,808.30  | WO            | HD            | TR | _____ |
| 11/24/21          | 8646416      | Work on the McCloskey joint Rule 26 statement, revise same and emails with counsel, follow-up.   | Zaro, David          | 0.70         | 585.90      | 18,394.20  | WO            | HD            | TR | _____ |
| 12/01/21          | 8653064      | Emails and attention to McCloskey litigation administration matters (0.5); review and confer with counsel regarding 26(f) report (0.5).  | Del Castillo, Joshua | 1.00         | 643.50      | 19,037.70  | WO            | HD            | TR | _____ |
| 12/01/21          | 8655176      | Call with Receiver counsel and work on the draft of the FRCP 26 report, follow-up email with McCloskey's counsel.  | Zaro, David          | 0.60         | 502.20      | 19,539.90  | WO            | HD            | TR | _____ |
| 12/02/21          | 8663273      | Follow-up with counsel as to the McCloskey-Cornerstone issues, address discovery and possible strategies toward negotiated settlement (.3). Evaluate McCloskey reply brief as to motion to dismiss (.4). | Zaro, David          | 0.70         | 585.90      | 20,125.80  | WO            | HD            | TR | _____ |
| 12/03/21          | 8655158      | prepare initial disclosures  | Rosenblum, Rachel    | 0.20         | 40.50       | 20,166.30  | WO            | HD            | TR | _____ |
| 12/08/21          | 8659963      | Work on further disclosure issues and discovery related to McCloskey (.9). Call/email related to disclosures and supplement (.2).  | Zaro, David          | 1.10         | 920.70      | 21,087.00  | WO            | HD            | TR | _____ |
| 12/09/21          | 8661088      | Evaluate the Court's Case Management order as to McCloskey and communications with Receiver and counsel.   | Zaro, David          | 0.40         | 334.80      | 21,421.80  | WO            | HD            | TR | _____ |



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**Fees for Matter 378224.00023.(McCloskey Litigation)**

| Trans Date | Index   | Description of Service Rendered  | Timekeeper  | Hours | Fees   | Sum       | Circle | Action |    |       |
|------------|---------|--|-------------|-------|--------|-----------|--------|--------|----|-------|
| 12/15/21   | 8669718 | Evaluate the McCloskey FRCP26 response, follow-up.   | Zaro, David | 0.40  | 334.80 | 21,756.60 | WO     | HD     | TR | _____ |
| 12/16/21   | 8669738 | Conference with counsel related to McCloskey Rule 26 disclosure and assess the next steps.   | Zaro, David | 0.20  | 167.40 | 21,924.00 | WO     | HD     | TR | _____ |
| 12/17/21   | 8671471 | Research/analysis of the McCloskey claims, assess settlement issues and follow-up.   | Zaro, David | 1.10  | 920.70 | 22,844.70 | WO     | HD     | TR | _____ |
| 12/20/21   | 8671529 | Further analysis and work on settlement related to McCloskey, follow-up with Receiver (.4). Conference with Mr. Napoli regarding settlement and litigation issues, follow-up (.4). | Zaro, David | 0.80  | 669.60 | 23,514.30 | WO     | HD     | TR | _____ |

**Disbursements for Matter 378224.00023 (McCloskey Litigation)**

| Trans Date | Index   | Type            | Quantity | Amt    | Circle | Action |    |       |
|------------|---------|-----------------|----------|--------|--------|--------|----|-------|
| 10/22/21   | 2739074 | RSRCH – WestLaw | 0.00     | 293.40 | WO     | HD     | TR | _____ |
| 10/22/21   | 2739517 | RSRCH – Lexis   | 0.00     | 198.00 | WO     | HD     | TR | _____ |

**Proforma Summary**

| Timekeeper Number | Timekeeper           | Hours | Rate   | Amounts     |
|-------------------|----------------------|-------|--------|-------------|
| 000313            | Zaro, David          | 13.20 | 837.00 | 11,048.40   |
| 001842            | Del Castillo, Joshua | 15.10 | 643.50 | 9,716.85    |
| 002369            | Aspis, Norman        | 0.90  | 445.50 | 400.95      |
| 002444            | Rosenblum, Rachel    | 2.60  | 202.50 | 526.50      |
| 002510            | Pham, Matt D.        | 4.40  | 414.00 | 1,821.60    |
|                   |                      | 36.20 |        | \$23,514.30 |
| Subtotal Fees     |                      |       |        | \$23,514.30 |

01/28/22 16:46:09 PROFORMA STATEMENT FOR MATTER 378224.00023 (Winkler, Geoff/Receiver for Essex Capita) (McCloskey Litigation)

**Proforma Summary**

**Timekeeper**

| Number              | Timekeeper | Hours | Rate | Amounts   |
|---------------------|------------|-------|------|-----------|
| Discount            |            |       |      | 0.00      |
| Total Fees          |            |       |      | 23,514.30 |
| Total Disbursements |            |       |      | 491.40    |

**Attorney Billing Instructions**

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

**Billing Instructions**

expires 6/30/2022: 10% off standard rates (automatic)

**Account Summary – As Of 01/28/22**

|                     | Fiscal YTD       |                  |               | Calendar YTD |      |       | LTD       |           |               |
|---------------------|------------------|------------------|---------------|--------------|------|-------|-----------|-----------|---------------|
|                     | Total            | Fees             | Disb.         | Total        | Fees | Disb. | Total     | Fees      | Disbursements |
| Worked              | 25,678.35        | 25,678.35        | 0.00          | 0.00         | 0.00 | 0.00  | 26,169.75 | 25,678.35 | 491.40        |
| 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>WIP</b>          | <b>26,169.75</b> | <b>25,678.35</b> | <b>491.40</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

01/28/22 16:46:09 PROFORMA STATEMENT FOR MATTER 378224.00023 (Winkler, Geoff/Receiver for Essex Capita) (McCloskey Litigation)

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

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## 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.

### MEMBERSHIPS

- Financial Lawyers Conference

### EDUCATION

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

### SERVICES

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

### INDUSTRIES

Financial Services  
Construction

- 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)

Institutional lenders, commercial litigants, and receivers look to Joshua del Castillo for inventive answers to complex creditors' rights, receivership, and regulatory questions. His depth of experience and creativity in the areas of creditors' rights litigation and bankruptcy, the unique relationships he has cultivated in the receiverships space, and his familiarity with up-to-the-minute regulatory developments, enable him to develop innovative strategies that mitigate client risks and improve client results.

### *Creditors' Rights, Litigation, and Regulatory Counsel*

Joshua is a key member of the firm's Restructuring, Insolvency & Bankruptcy practice group, and routinely serves as counsel for institutional lenders or other creditors in bankruptcy and commercial litigation proceedings throughout California, in both state and federal courts, in addition to providing oversight to local counsel nationwide. Joshua likewise regularly represents clients in state and federal appellate matters. He is often called upon to provide proactive regulatory counsel, dispensing compliance advice and developing and deploying troubleshooting strategies, many derived from his extensive experience in serving as defense counsel to financial institutions in regulatory matters. In this capacity, Joshua assists clients in effectively satisfying their regulatory obligations while seeking to avoid potentially costly litigation or penalties.

### *A Pioneer in Receivership Solutions*

As a member of the firm's premier Receiverships, Lenders & Special Creditor Remedies practice group, Joshua has been recognized for pioneering new legal solutions for receivers in state and federal matters, and has developed significant practical experience in creditors' rights, bankruptcy, and

#### 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

commercial litigation, including in the receivership context. This experience has taught him how to leverage new developments in the law to find innovative solutions to both age-old and novel problems.

Joshua bolsters his ability to solve multi-faceted client problems with broad access critical resources at Allen Matkins—including attorneys with unique knowledge and relationships across a spectrum of environmental, real estate, securities, labor, and related issues—and regularly works with an extensive network of outside professionals, including forensic accountants, tax accountants, private investigators, property managers, and brokers. Joshua endeavors to staff matters leanly so that his clients become familiar with all of the attorneys working on their matters, and receive accountable and responsive service.

### ***In the Community***

While helping his clients thrive, Joshua works to help the broader community prosper. In addition to his commitment to *pro bono* service, he currently serves on the advisory board of the Wage Justice Center, which works to advance low-income workers' rights, educate workers, and advocate for the collection of unpaid wages.

### **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.



## Kevin D. Lloyd

PARTNER | LOS ANGELES

T (213) 955-5629

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

Kevin D. Lloyd is a litigation partner in the firm's Los Angeles office. Kevin's practice encompasses a broad range of commercial litigation and criminal defense matters, representing clients in matters involving federal and state securities laws, the duties of corporate officers and directors, intellectual property disputes, commercial disputes, contract disputes, labor and employment disputes, civil forfeiture actions, SEC enforcement actions, and criminal insider trading. He has significant trial and arbitration experience, including first chairing and leading large teams for multiple jury trials.

### EDUCATION

J.D., Stanford Law School, with distinction  
B.A., *magna cum laude*, Duke University

### SERVICES

Litigation & Counseling  
Business Disputes  
Jury Trials

### INDUSTRIES

Financial Services

### BAR ADMISSIONS

- California

### MEMBERSHIPS

- Los Angeles County Bar Association



**M e D.**

ASSOCIATE | LOS ANGELES

T (213) 955-5526

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Matthew D. Pham is an associate in the Los Angeles office of Allen Matkins where he is a member of the Receiverships, Lenders & Special Creditor Remedies and the Restructuring, Insolvency & Bankruptcy practice groups.

Across a range of bankruptcy and insolvency-related proceedings, such as chapter 11 cases, receiverships, assignments for the benefit of creditors, and out-of-court workouts, Matt has represented a variety of constituents, including operating debtors, creditors' committees, secured and unsecured creditors, shopping center landlords, utility companies, and defendants in avoidance actions.

Following law school, Matt served in two clerkships. From 2011 to 2014, he was a rotating law clerk to the Honorable Fredrick E. Clement, W. Richard Lee (retired), and Whitney Rimel (retired) of the U.S. Bankruptcy Court, Eastern District of California. Then, from 2014 to 2015, he clerked for the Honorable Scott H. Yun of the U.S. Bankruptcy Court, Central District of California. Prior to joining Allen Matkins, Matt was in private practice at two mid-sized firms in Southern California

### MEMBERSHIPS

- Insolvency Law Committee of the California Lawyers Association's Business Law Section (current chair of the Constituency, Outreach, and Website Subcommittee)
- Financial Lawyers Conference
- American Bankruptcy Institute

### BAR ADMISSIONS

- California

### COURT ADMISSIONS

- U.S. District Court, Central District of California
- U.S. District Court, Eastern District of California

- U.S. District Court, Northern District of California
- U.S. District Court, Southern District of California

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**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 **March 25, 2022**, I caused to be served on all the parties to this action addressed as stated on the attached service list the document entitled: **ELEVENTH INTERIM APPLICATION OF RECEIVER, GEOFF WINKLER, AND HIS GENERAL COUNSEL, ALLEN MATKINS LECK GAMBLE MALLORY & NATSIS LLP, 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.

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 **March 25, 2022** at Los Angeles, California.

/s/ Martha Diaz  
Martha Diaz