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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 vs.

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

17 Defendants.

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

**THIRTEENTH INTERIM
APPLICATION OF RECEIVER,
GEOFF WINKLER, AND HIS
PROFESSIONALS FOR PAYMENT
OF FEES AND REIMBURSEMENT
OF EXPENSES**

Date: October 13, 2022

Time: 10:00 a.m.

Ctrm: 6D

Judge: Hon. Fernando M. Olguin

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TABLE OF CONTENTS

	<u>Page</u>
1	
2	
3	I. INTRODUCTION.....4
4	II. GENERAL SUMMARY.....5
5	III. THE RECEIVER'S FEES AND EXPENSES.....6
6	A. Appointment of the Receiver.....6
7	B. Services Rendered During the Application Period.....6
8	1. Financial – Accounting/Auditing7
9	2. Financial – Business Analysis7
10	3. Financial – Data Analysis.....8
11	4. Financial – Forensic Accounting.....8
12	5. Financial – Litigation Consulting.....8
13	6. Financial – Tax Issues9
14	7. Legal – Asset Analysis and Recovery.....9
15	8. Legal – Asset Disposition.....10
16	9. Legal – Business Operations10
17	10. Legal – Case Administration10
18	11. Legal – Claims Administration.....11
19	C. Expenses Incurred During the Application Period11
20	IV. ALLEN MATKINS' FEES AND EXPENSES.....12
21	A. The Receiver's Retention of Allen Matkins.....12
22	B. Services Rendered During the Application Period.....12
23	1. General Receivership.....13
24	2. Asset Recovery & Management.....14
25	3. Investigation/Reporting15
26	4. Investor Issues/Communications.....15
27	5. Sale/Disposition/Transfer of Assets16
28	6. Claims/Distribution.....16

	<u>Page</u>
1	
2	7. Third Party Claims & Recoveries.....17
3	8. CVL Asset Recovery & Litigation17
4	9. CVL Litigation.....18
5	10. Fazio Litigation.....19
6	11. Siemens Litigation20
7	12. Fead Litigation.....21
8	13. Largura Litigation.....21
9	14. Hopen Litigation.....23
10	15. Nicholson Litigation23
11	16. Reyner Litigation24
12	17. Emmons Litigation26
13	18. McCloskey Litigation27
14	C. Expenses Incurred During the Application Period27
15	V. MILLER KAPLAN'S FEES AND EXPENSES28
16	A. The Receiver's Retention of Miller Kaplan28
17	B. Services Rendered During the MK Application Period.....28
18	1. General Consulting Services28
19	2. Qualified Settlement Fund Services29
20	C. Expenses Incurred During the MK Application Period.....29
21	VI. THE FEES AND EXPENSES INCURRED ARE REASONABLE AND SHOULD BE ALLOWED.....29
22	VII. CONCLUSION29
23	
24	
25	
26	
27	
28	

1 Geoff Winkler (the "Receiver"), the Court-appointed permanent receiver for
 2 defendant Essex Capital Corporation ("Essex") and its subsidiaries and affiliates
 3 (collectively, with Essex, the "Receivership Entities" or "Entities"), his counsel of
 4 record, Allen Matkins Leck Gamble Mallory & Natsis LLP ("Allen Matkins"), and
 5 his tax accountant, Miller Kaplan Arase LLP ("Miller Kaplan," and collectively,
 6 with the Receiver and Allen Matkins, the "Applicants"), hereby jointly submit this
 7 thirteenth interim application for the payment of fees and the reimbursement of
 8 expenses (the "Fee Application" or "Application").

9 **I. INTRODUCTION**

10 This Fee Application is the thirteenth interim fee application submitted in the
 11 above-referenced matter. With respect to the Receiver and Allen Matkins, the Fee
 12 Application covers their fees and expenses incurred during the period from April 1,
 13 2022, through June 30, 2022 (the "Application Period"), and with respect to Miller
 14 Kaplan, the Application covers its fees and expenses incurred during the period
 15 from October 1, 2021, through May 31, 2022 (the "MK Application Period").

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

23

24 Applicant	Fees	Interim Payment of Fees	Expenses	Interim Payment of Expenses
25 Receiver	\$115,043.50	\$92,034.80	\$1,414.83	\$1,414.83
26 Allen Matkins	\$297,739.80	\$238,191.84	\$7,746.75	\$7,746.75
27 Miller Kaplan	\$7,736.00	\$6,188.80	\$0.00	\$0.00
28 [REDACTED]	\$420,519.30	\$336,415.44	\$9,161.58	\$9,161.58

1 Consistent with the billing guidelines of plaintiff the Securities and Exchange
2 Commission (the "SEC") and the Applicants' commitments for this federal
3 receivership, the remaining, unpaid 20% "holdback" of the Applicants' approved
4 fees will be subject to final review and payment at the conclusion of this
5 receivership.

6 **II. GENERAL SUMMARY**

7 During the Application Period, and with assistance from Allen Matkins and
8 Miller Kaplan, the Receiver made substantial progress in the satisfaction of his
9 duties and the objectives outlined by this Court in its *Order Regarding Preliminary*
10 *Injunction and Appointment of a Permanent Receiver* (the "Appointment Order")
11 entered on December 21, 2018, ECF No. 66, its *Order in Aid of Receivership* (the
12 "Order in Aid") entered on February 1, 2019, ECF No. 69, and its *Order Regarding*
13 *Permanent Injunction* (the "Permanent Injunction Order") entered on
14 September 9, 2019, ECF No. 113. Among other things, the Receiver continued to
15 execute his plan for recovering and maximizing the assets of the Receivership Estate
16 (the "Receivership Assets" or "Assets"), including via the evaluation and
17 prosecution of claims against third parties believed to be in wrongful possession of
18 any Receivership Assets, with a focus on his continued pursuit of disgorgement
19 actions against profiting investors, which efforts have, to-date, resulted in the
20 recovery of more than \$3 million in Receivership Assets.

21 Given the amount and significance of the work completed by the Applicants
22 during the Application Period or MK Application Period, as applicable, the
23 Applicants respectfully submit that the fees and expenses incurred during the
24 applicable period are reasonable and appropriate and should be approved and paid,
25 on an interim basis, in the amounts indicated above. As an accommodation to the
26 Estate, and consistent with the SEC's billing guidelines and the ordinary practice in
27 federal receiverships, the Applicants request that the Court approve 100% of their
28

1 fees and expenses incurred during the applicable period but authorize payment, on
 2 an interim basis, of only 80% of such fees and 100% of such expenses at this time.

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

4 **A. Appointment of the Receiver.**

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

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

8 During the Application Period, the Receiver and his staff undertook additional
 9 efforts in connection with the Receiver's review and analysis of the business and
 10 financial activities of the Receivership Entities; investigated and recovered
 11 Receivership Assets, including by attending to pending litigation to recover such
 12 Assets; identified prospective claims against third parties; administered the claims
 13 process by which investors in and creditors of the Entities submitted claims against
 14 the Estate; and otherwise administered the Estate.

15 Overall, on account of their services rendered on behalf of the Receivership
 16 Estate during the Application Period, the Receiver and his staff billed 493.8 hours
 17 and \$115,043.50 in fees across the following eleven categories:

Category	Hours	Fees
Financial – Accounting/Auditing	73.8	\$14,109.90
Financial – Business Analysis	0.3	\$67.50
Financial – Data Analysis	4.9	\$1,057.50
Financial – Forensic Accounting	6.8	\$1,897.20
Financial – Litigation Consulting	79.4	\$16,515.30
Financial – Tax Issues	31.5	\$8,532.90
Legal – Asset Analysis and Recovery	112.2	\$27,129.60
Legal – Asset Disposition	8.2	\$2,331.00
Legal – Business Operations	1.5	\$337.50
Legal – Case Administration	168.9	\$41,424.40
Legal – Claims Administration	6.3	\$1,640.70
	493.8	\$115,043.50

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

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

6 In connection with the "Financial – Accounting/Auditing" category, the
7 Receiver and his staff billed 73.8 hours and \$14,109.90 in fees during the
8 Application Period.

9 The services in this category generally relate to the review, analysis, and audit
10 of the Receivership Entities' accounting, including in connection with the Receiver's
11 ongoing litigation to recover funds from Ponzi "winners," the calculation of an
12 appropriate initial distribution to holders of allowed claims against the Estate, and
13 the submission of tax returns for various Receivership Entities. Given that certain
14 billing categories may overlap or be non-exclusive, additional work on these topics
15 was also billed to other categories, as reflected below. The work performed by the
16 Receiver and his staff also included running additional bank statements through the
17 Receiver's accounting software and reviewing the transactions therefrom for the
18 purposes of keeping the Receiver's accounting up to date. The Receiver and his
19 staff also performed additional accounting-related work in updating and
20 supplementing an earlier forensic accounting analysis in what ultimately took the
21 form of the *Supplemental Forensic and Investigative Accounting Report* (the
22 "Supplemental Forensic Report") that was filed in the SEC Action on April 25,
23 2022.

24 **2. Financial – Business Analysis.**

25 In connection with the "Financial – Business Analysis" category, the Receiver
26 and his staff billed 0.3 hours and \$67.50 in fees during the Application Period.

27 The services in this category generally pertain to analyzing the Receivership
28 Entities' business operations, including their private equity investments.

1 **3. Financial – Data Analysis.**

2 In connection with the "Financial – Data Analysis" category, the Receiver and
3 his staff billed 4.9 hours and \$1,057.50 in fees during the Application Period.

4 The services in this category concern the review and analysis of third-party
5 financial data. During the Application Period, the Receiver and his staff expended
6 limited time for this category processing bank statements from third-party financial
7 institutions through their data entry automation software and then auditing the
8 results from that process for the purposes of updating the Receiver's accounting.

9 **4. Financial – Forensic Accounting.**

10 In connection with the "Financial – Forensic Accounting" category, the
11 Receiver and his staff billed 6.8 hours and \$1,897.20 in fees during the Application
12 Period.

13 The services in this category generally pertain to the Receiver's forensic
14 accounting of the Receivership Entities' finances. The work performed by the
15 Receiver and his staff for this category during the Application Period substantially
16 revolved around updating and finalizing the Supplemental Forensic Report that was
17 filed in the SEC Action during the Application Period.

18 **5. Financial – Litigation Consulting.**

19 In connection with the "Financial – Litigation Consulting" category, the
20 Receiver and his staff billed 79.4 hours and \$16,515.30 in fees during the
21 Application Period.

22 The services in this category most directly relate to the review and assessment
23 of claims or other litigation against third parties. During the Application Period, for
24 this category, the work performed by the Receiver and his staff primarily concerned
25 their handling of additional investor-accounting-related work and resolution of
26 purported accounting discrepancies in connection with the Largura, Reyner, and
27 McCloskey Actions (as those terms are defined below). The Receiver and his staff
28 performed this accounting work in preparation for, or as a result of, the mandatory

1 settlement conferences in those three actions, such that the parties could at least
2 have no factual dispute regarding the universe of transactions between the
3 Receivership Entities and the applicable disgorgement defendants.

4 **6. Financial – Tax Issues.**

5 In connection with the "Financial – Tax Issues" category, the Receiver and his
6 staff billed 31.5 hours and \$8,532.90 in fees during the Application Period.

7 The services in this category relate directly to work addressing tax-related
8 issues and obligations facing the Receivership Estate. During the Application
9 Period, for this category, the Receiver and his staff expended most of their time on
10 addressing an issue with the Estate's tax accountant and the Internal Revenue
11 Service relating to their obtaining a tax identification number for a qualified
12 settlement fund that would allow for the Estate to submit tax returns.

13 **7. Legal – Asset Analysis and Recovery.**

14 In connection with the "Legal – Asset Analysis and Recovery" category, the
15 Receiver and his staff billed 112.2 hours and \$27,129.60 in fees during the
16 Application Period.

17 The services in this category broadly relate to the efforts to identify, secure,
18 preserve, and recover any Receivership Assets, including via any claims against
19 third parties. During the Application Period, the Receiver and his staff devoted a
20 significant amount of time performing tasks relating to the pending disgorgement
21 actions against profiting investors. They worked on a number of discovery-related
22 tasks, including locating and compiling documents to be produced in response to
23 disgorgement defendants' document requests and providing information for use in
24 the Receiver's responses to written discovery requests. For a number of those
25 disgorgement actions, the Receiver also provided information that was used to
26 prepare the required confidential settlement briefs and attended multiple mandatory
27 settlement conferences before the Honorable Alexander F. MacKinnon. The
28 Receiver and his staff also continued settlement administration (e.g., collecting

1 payments) with respect to those profiting investors who agreed to settle the
2 Receiver's prospective disgorgement claims against them prior to the
3 commencement of formal litigation.

4 Finally, for this category, the Receiver and his staff also evaluated certain
5 Receivership Assets, including artwork, that could ultimately be liquidated.

6 **8. Legal – Asset Disposition.**

7 In connection with the "Legal – Asset Disposition" category, the Receiver and
8 his staff billed 8.2 hours and \$2,331 in fees during the Application Period.

9 The services in this category broadly relate to the efforts to sell, transfer, or
10 otherwise dispose of Receivership Assets. During the Application Period, the work
11 performed by the Receiver and his staff for this category included their efforts to
12 reconcile their asset list and perform a final asset search for any remaining,
13 unaccounted for Receivership Assets that could be sold by the Receiver.

14 **9. Legal – Business Operations.**

15 In connection with the "Legal – Business Operations" category, the Receiver
16 and his staff billed 1.5 hours and \$337.50 in fees during the Application Period.

17 During the Application Period, the services render by the Receiver and his
18 staff for this category generally pertained to the evaluation of the Receivership
19 Entities' remaining private equity investment holdings and their possible disposition.

20 **10. Legal – Case Administration.**

21 In connection with the "Legal – Case Administration" category, the Receiver
22 and his staff billed 168.9 hours and \$41,424.40 in fees during the Application
23 Period.

24 The services in this category concern the general administration of the
25 Receivership Estate, along with the handling of other necessary administrative
26 matters for the receivership. During the Application Period, the Receiver and his
27 staff communicated extensively with Allen Matkins regarding the administration of
28 the Receivership Entities and the Estate, along with the legal work required to

1 enable the Receiver to undertake those efforts he deemed necessary, with particular
2 attention to efforts regarding the marshalling and recovery of Assets and his
3 administration of the claims against the Estate pursuant to the Court-approved
4 claims procedures. For this category, the Receiver and his staff also expended time
5 on other administrative matters, including updating the website for the above-
6 entitled receivership and responding to inquiries from claimants and investors,
7 usually regarding updates as to the status of the receivership and the claims and
8 distribution process. This category also encompasses other services that do not fall
9 squarely within any other category or that might simultaneously fall within this
10 category and another, such as the Receiver and his staff's efforts to gather
11 information and locate documents in connection with discovery across multiple
12 disgorgement actions and for other, internal purposes.

13 **11. Legal – Claims Administration.**

14 In connection with the "Legal – Claims Administration" category, the
15 Receiver and his staff billed 6.3 hours and \$1,640.70 in fees during the Application
16 Period.

17 The services in this category directly relate to the receivership's claims and
18 distribution process, including the efforts to identify, analyze, and resolve the
19 investor and creditor claims against the Estate, and to calculate and administer
20 anticipated distributions to holders of allowed claims against the Estate. During the
21 Application Period, the Receiver and his staff primarily expended time for this
22 category in communicating with claimants (i.e., investors) who inquired about the
23 details of the Receiver's now-approved distribution plan, including the timing and
24 amount of any distributions.

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

26 In connection with his services rendered on behalf of the Receivership Estate
27 during the Application Period, the Receiver incurred \$1,414.83 in expenses. The
28

1 Receiver's invoices, attached hereto as **Exhibit 1**, detail each of the Receiver's
2 expenses.

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

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

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

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

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

18 Overall, on account of its services rendered to the Receiver during the
19 Application Period, Allen Matkins billed 515.4 hours and \$297,739.80 in fees across
20 the following eighteen categories:

Category	Hours	Fees
General Receivership	20.2	\$11,461.05
Asset Recovery & Management	32.1	\$21,604.50
Investigation/Reporting	14.9	\$8,165.25
Investor Issues/Communications	1.0	\$643.50
Sale/Disposition/Transfer of Assets	0.6	\$386.10
Claims/Distribution	9.4	\$5,704.65
Third Party Claims & Recoveries	1.7	\$703.80
CVL Asset Recovery & Litigation	6.2	\$4,770.90

1	CVL Litigation	140.3	\$78,348.15
2	Fazio Litigation	18.8	\$12,006.00
3	Siemens Litigation	4.4	\$2,739.60
4	Fead Litigation	4.1	\$2,477.70
5	Largura Litigation	29.9	\$16,853.85
6	Hopen Litigation	16.5	\$9,096.30
7	Nicholson Litigation	32.3	\$16,511.85
8	Reyner Litigation	88.3	\$53,937.90
9	Emmons Litigation	24.0	\$11,609.10
	McCloskey Litigation	70.7	\$40,719.60
		515.4	\$297,739.80

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

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

20 **1. General Receivership.**

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

Timekeeper	Position	Hourly Rate	Hours	Fees
Joshua del Castillo	Partner	\$643.50	14.5	\$9,330.75
Matthew Pham	Associate	\$414.00	2.3	\$952.20
Mikayla O'Neal	Associate	\$346.50	3.4	\$1,178.10
			20.2	\$11,461.05

28

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

8 **2. Asset Recovery & Management.**

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

Timekeeper	Position	Hourly Rate	Hours	Fees
David Zaro	Partner	\$837.00	4.9	\$4,101.30
Joshua del Castillo	Partner	\$643.50	27.2	\$17,503.20
			32.1	\$21,604.50

15 The services in this category concern Allen Matkins' work supporting the
16 Receiver's efforts to identify, secure, preserve, and recover any Receivership Assets.
17 During the Application Period, for this category, Allen Matkins devoted most of its
18 time on tasks that commonly benefited all of the Receiver's pending disgorgement
19 actions against profiting investors. For example, Allen Matkins researched and
20 analyzed various defenses and other legal issues that have been almost uniformly
21 raised by defendants across multiple disgorgement actions. The firm also attended
22 to settlement-related issues that it expected would commonly arise in those actions.
23 In addition, during the Application Period, Allen Matkins' work also included its
24 efforts to recover additional Receivership Assets from other third parties who were
25 not the subject of any formal litigation. To date, the Estate's total recovery through
26 settlements has exceeded \$3 million, and additional recoveries for the Estate are
27 anticipated as the Receiver continues to hold settlement discussions with the
28

1 remaining targets of clawback claims (including those who are currently subject to a
 2 pending disgorgement action) or otherwise prosecute those claims to final judgment.

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
Joshua del Castillo	Partner	\$643.50	8.7	\$5,598.45
Matthew Pham	Associate	\$414.00	6.2	\$2,566.80
			14.9	\$8,165.25

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 10 The services in this category generally relate to Allen Matkins assisting the
 11 Receiver in his efforts to investigate the nature, location, and recovery of
 12 Receivership Assets, along with addressing inquiries relating to the business and
 13 financial activities of the Receivership Entities. This category also encompasses
 14 Allen Matkins' work relating to the Receiver's reporting obligations. During the
 15 Application Period, Allen Matkins primarily expended time for this category in
 16 preparing the Receiver's eleventh interim report to this Court and finalizing his
 17 Supplemental Forensic Report.

18 **4. Investor Issues/Communications.**

19 In connection with the "Investor Issues/Communications" category, Allen
 20 Matkins personnel billed the following time and fees during the Application Period:

Timekeeper	Position	Hourly Rate	Hours	Fees
Joshua del Castillo	Partner	\$643.50	1.0	\$643.50
			1.0	\$643.50

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 22
 23
 24
 25 The services in this category generally concern issues involving investors or
 26 creditors and Allen Matkins' communications with such parties. The nominal time
 27 expended by Allen Matkins for this category during the Application Period was for
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1 communicating with investors regarding the status of the Receiver's distributions to
2 investors and creditors under his since-approved distribution plan.

3 **5. Sale/Disposition/Transfer of Assets.**

4 In connection with the "Sale/Disposition/Transfer of Assets" category, Allen
5 Matkins personnel billed the following time and fees during the Application Period:

Timekeeper	Position	Hourly Rate	Hours	Fees
Joshua del Castillo	Partner	\$643.50	0.6	\$386.10
			0.6	\$386.10

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9
10 The services in this category generally relate to Allen Matkins assisting the
11 Receiver in his efforts to sell or liquidate Receivership Assets. The limited time
12 expended by Allen Matkins for this category during the Application Period was in
13 advising the Receiver's office on the sale of the Estate's shares in the company
14 ChowNow to an interested buyer.

15 **6. 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
Joshua del Castillo	Partner	\$643.50	7.9	\$5,083.65
Matthew Pham	Associate	\$414.00	1.5	\$621.00
			9.4	\$5,704.65

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22 The services in this category generally consist of 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 prospective distributions to
25 claimants. During the Application Period, Allen Matkins' work for this category
26 primarily related to advising the Receiver and his team on implementing the since-
27 approved distribution plan to investors and creditors. In particular, Allen Matkins
28 worked closely with the Receiver's team on developing a plan for the Receiver to

1 make an initial distribution to investors, including assisting his team in estimating
2 the anticipated recoveries from the remaining disgorgement actions and in resolving
3 certain outstanding tax-related issues (both of which could affect how much the
4 initial distribution would be). The Receiver ultimately made an initial distribution
5 to investors totaling \$3 million, shortly after the close of the Application Period.

6 **7. Third Party Claims & Recoveries.**

7 In connection with the "Third Party Claims & Recoveries" category, Allen
8 Matkins personnel billed the following time and fees during the Application Period:

Timekeeper	Position	Hourly Rate	Hours	Fees
Matthew Pham	Associate	\$414.00	1.7	\$703.80
			1.7	\$703.80

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13 The services in this category relate include any work in connection with the
14 Receivership Estate's claims and associated recoveries against third parties (to the
15 extent that a separate billing category has not yet been created for a particular
16 action). During the Application Period, the limited work performed by Allen
17 Matkins for this category was associated with handling miscellaneous tasks
18 commonly affecting the McCloskey, Emmons, Nicholson, and Hopen Actions (as
19 those terms are defined below).

20 **8. CVL Asset Recovery & Litigation.**

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

Timekeeper	Position	Hourly Rate	Hours	Fees
Michael Farrell	Partner	\$769.50	6.2	\$4,770.90
			6.2	\$4,770.90

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27 The services in this category generally relate to any work in evaluating and, if
28 appropriate, pursuing claims and associated recoveries of Receivership Assets

1 against 915 Elm Avenue CVL, LLC ("CVL"), separate from the pending action
2 captioned as *Winkler v. 915 Elm Avenue CVL, LLC* and bearing Case No. 2:21-cv-
3 00869-FMO-AFM (the "CVL Action"). During the Application Period, Allen
4 Matkins expended time in analyzing and working out the complex terms and
5 structure of a global settlement agreement with CVL, which would not only resolve
6 the CVL Action but would also address additional issues relating to the post-
7 settlement governance of CVL, such as the extent of the Receiver's membership
8 interest in CVL and his rights associated therewith.

9 **9. CVL Litigation.**

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

Timekeeper	Position	Hourly Rate	Hours	Fees
David Zaro	Partner	\$837.00	9.1	\$7,616.70
Kevin Lloyd	Partner	\$670.50	18.2	\$12,203.10
Joshua del Castillo	Partner	\$643.50	51.3	\$33,011.55
Matthew Pham	Associate	\$414.00	61.3	\$25,378.20
Alexandra Jernigan	Associate	\$346.50	0.4	\$138.60
			140.3	\$78,348.15

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19 The services in this category are associated with the litigation in the CVL
20 Action, currently pending before this Court. During the Application Period, Allen
21 Matkins continued to represent the Receiver in prosecuting valuable claims against
22 CVL in the CVL Action, performing various demanding tasks in connection with
23 the litigation, primarily relating to settlement and summary judgment.

24 Prior to the Application Period, Allen Matkins had already begun the process
25 of preparing the Receiver's motion for summary judgment in accordance with the
26 Court's "joint" procedures. During the Application Period, Allen Matkins continued
27 that process by preparing the Receiver's response to CVL's summary judgment
28 motion, which was incorporated into the joint brief, joint appendix of undisputed

1 and disputed facts, and joint evidentiary appendix prepared by Allen Matkins and
2 opposing counsel. Following the filing of the parties' cross motions, Allen Matkins
3 also began working on a supplemental memorandum in support of the Receiver's
4 motion, as well as jury instructions and verdict forms for a potential trial in the event
5 that summary judgment was denied in the CVL Action.

6 However, during the Application Period, Allen Matkins also communicated
7 extensively with opposing counsel as part of the parties' ongoing settlement
8 discussions following the completion of their productive but ultimately unsuccessful
9 mandatory settlement conference before the Honorable Suzanne H. Segal (ret.).
10 Those discussions eventually led to the parties reaching a settlement, in principle,
11 and thereafter, Allen Matkins handled the task of drafting a comprehensive, global
12 settlement agreement between the Receiver and CVL and related parties, which
13 ultimately went through several rounds of revisions between counsel given the
14 complicated nature of some of the issues resolved therein. The settlement
15 agreement has since been finalized and executed by the parties (but its effectiveness
16 is still conditioned the Court's approval), and the Receiver intends to promptly seek
17 the approval of that settlement agreement once he completes his inspection of CVL's
18 business premises (another outstanding condition of settlement).

19 **10. Fazio Litigation.**

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

22

Timekeeper	Position	Hourly Rate	Hours	Fees
Joshua del Castillo	Partner	\$643.50	18.4	\$11,840.40
Matthew Pham	Associate	\$414.00	0.4	\$165.60
			18.8	\$12,006.00

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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 before this Court,
28 in the matter captioned as *Winkler v. Fazio, et al.* and bearing Case No. 2:21-cv-

1 02987-FMO-AFM (the "Fazio Action"). With the parties having executed a
 2 settlement agreement, Allen Matkins' work during the Application Period for this
 3 category was primarily related to the drafting of the motion seeking the Court's
 4 approval of the parties' settlement agreement, along with the related application
 5 seeking leave to file that motion under seal (in order to ensure that other
 6 disgorgement defendants could not utilize the undisclosed arguments and defenses
 7 recited in the settlement agreement in their own cases). Following the Court's
 8 approval of the settlement agreement and the Receiver's receipt of the settlement
 9 payment from the Fazio defendants, Allen Matkins also prepared and filed a
 10 stipulation to dismiss the Fazio Action, with prejudice, in accordance with the terms
 11 of the settlement agreement. The Fazio Action was then formally dismissed by this
 12 Court on June 13, 2022.

13 **11. Siemens Litigation.**

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

Timekeeper	Position	Hourly Rate	Hours	Fees
Joshua del Castillo	Partner	\$643.50	4.0	\$2,574.00
Matthew Pham	Associate	\$414.00	0.4	\$165.60
			4.4	\$2,739.60

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 20 The services in this category are associated with the litigation in the
 21 Receiver's disgorgement action against alleged profiting investors before this Court,
 22 in the matter captioned as *Winkler v. Siemens, et al.* and bearing Case No. 2:21-cv-
 23 04515-FMO-AFM (the "Siemens Action"). During the Application Period, Allen
 24 Matkins' limited work for this category related to finalizing the settlement
 25 agreement between the parties and drafting the stipulation to approve that settlement
 26 agreement. After the Court approved the settlement agreement and the Siemens
 27 defendants remitted the settlement payment, Allen Matkins similarly prepared and
 28 filed a stipulation to dismiss the Siemens Action, with prejudice, in accordance with

1 the terms of the settlement agreement. The Court then formally dismissed the
 2 Siemens Action on May 27, 2022.

3 **12. Fead Litigation.**

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

Timekeeper	Position	Hourly Rate	Hours	Fees
Joshua del Castillo	Partner	\$643.50	3.4	\$2,187.90
Matthew Pham	Associate	\$414.00	0.7	\$289.80
			4.1	\$2,477.70

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 10 The services in this category are associated with the litigation in the
 11 Receiver's disgorgement action against an alleged profiting investor before this
 12 Court, in the matter captioned as *Winkler v. Fead* and bearing Case No. 2:21-cv-
 13 04519-FMO-AFM (the "Fead Action"). During the Application Period, Allen
 14 Matkins' limited work for this category was likewise related to settlement. Allen
 15 Matkins finalized the settlement agreement between the parties, and following the
 16 execution thereof, the firm also prepared the stipulation seeking the Court's approval
 17 of the settlement agreement. After the parties obtained the Court's approval and the
 18 Receiver received the settlement payment from the defendant, Allen Matkins also
 19 prepared and filed the stipulation to dismiss the Fead Action, with prejudice, in
 20 accordance with the terms of the settlement agreement. The Court then dismissed
 21 the Fead Action on May 27, 2022.

22 **13. 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	19.5	\$12,548.25
Matthew Pham	Associate	\$414.00	10.4	\$4,305.60
			29.9	\$16,853.85

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, previously captioned as *Winkler v. Largura* and bearing Case
4 No. 2:21-cv-04534-FMO-AFM (the "Largura Action"). During the Application
5 Period, Allen Matkins' work in connection with the Largura Action first related to
6 the parties' mandatory settlement conference before Judge MacKinnon. In
7 connection with that conference, Allen Matkins expended time analyzing the
8 Receiver's updated accounting (in light of transactions newly identified by the
9 defendant Robert Largura ("Largura")), preparing for and attending the conference,
10 and conferring with opposing counsel regarding the scheduling and the scope of a
11 second settlement conference session before Judge MacKinnon. Allen Matkins also
12 prepared the Receiver's written discovery requests that were propounded on Largura
13 during the Application Period.

14 Unfortunately, Largura passed away during the Application Period, shortly
15 after the first settlement conference session, but Allen Matkins continued to
16 communicate extensively with opposing counsel, who had been retained to represent
17 Largura's successor, Karl Davis and Wayne Siemens, as trustees of the Robert
18 Largura Administrative Trust established April 22, 2022 (the "Largura Trustees").
19 Through those continued discussions, the Receiver and the Largura Trustees were
20 able to reach a settlement, in principle. But before the parties could memorialize
21 and enter into a formal settlement agreement, Allen Matkins drafted the stipulation
22 to substitute the Largura Trustees for Largura as defendants in the Largura Action.
23 Following the Application Period, once the Court approved the substitution, the
24 Receiver and the Largura Trustees then finalized, executed, and obtained the Court's
25 approval of their settlement agreement. Provided that the Largura Trustees timely
26 make the settlement payment, the Largura Action should similarly be dismissed,
27 with prejudice, at some point during the next application period.

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14. **Hopen Litigation.**

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

Timekeeper	Position	Hourly Rate	Hours	Fees
Michael Farrell	Partner	\$769.50	0.9	\$692.55
Joshua del Castillo	Partner	\$643.50	8.8	\$5,662.80
Matthew Pham	Associate	\$414.00	5.7	\$2,359.80
Mikayla O'Neal	Associate	\$346.50	1.1	\$381.15
			16.5	\$9,096.30

The services in this category are associated with the litigation in the Receiver's disgorgement action against alleged profiting before this Court, in the matter captioned as *Winkler v. Hopen Life Science Ventures* and bearing Case No. 2:21-cv-06049-FMO-AFM (the "Hopen Action"). During the Application Period, Allen Matkins' work in this category primarily related to the Receiver's rights and obligations under Rule 26 in the Hopen Action. Allen Matkins first prepared the Receiver's portions of the parties' joint Rule 26(f) report and discovery plan, as well as his initial disclosures under Rule 26(a)(1)(A). Thereafter, the firm expended time in drafting requests for production, requests for admission, and interrogatories, which were subsequently propounded on the defendant.

The Receiver continues to prosecute the Hopen Action but hopes that the parties' forthcoming mandatory settlement conference before Judge MacKinnon will be productive and allow the parties to settle.

15. **Nicholson Litigation.**

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

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Timekeeper	Position	Hourly Rate	Hours	Fees
David Zaro	Partner	\$837.00	0.6	\$502.20
Michael Farrell	Partner	\$769.50	5.6	\$4,309.20
Joshua del Castillo	Partner	\$643.50	3.9	\$2,509.65
Matthew Pham	Associate	\$414.00	22.2	\$9,190.80
			32.3	\$16,511.85

6 The services in this category are associated with the litigation in the
 7 Receiver's disgorgement action against an alleged profiting investor before this
 8 Court, in the matter captioned as *Winkler v. Nicholson* and bearing Case No. 2:21-
 9 cv-07458-FMO-AFM (the "Nicholson Action"). During the Application Period,
 10 Allen Matkins's work for this category was primarily related to the parties' discovery
 11 efforts in the Nicholson Action. Allen Matkins first expended significant time in
 12 drafting the Receiver's responses to the defendant's 68 requests for production,
 13 22 requests for admission, and 18 interrogatories. Allen Matkins also prepared
 14 extensive sets of requests for production, requests for admission, and interrogatories
 15 on behalf of the Receiver, which were propounded on the defendant at the end of the
 16 Application Period. Though both sides have spent substantial time in connection
 17 with discovery, the Receiver hopes that such discovery efforts will mean that the
 18 parties have limited factual disputes between them ahead of their mandatory
 19 settlement conference before Judge MacKinnon to allow for an effective conference
 20 where the relevant issues have already been narrowed.

21 **16. Reyner Litigation.**

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

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Timekeeper	Position	Hourly Rate	Hours	Fees
David Zaro	Partner	\$837.00	2.0	\$1,674.00
Michael Farrell	Partner	\$769.50	35.3	\$27,163.35
Joshua del Castillo	Partner	\$643.50	19.7	\$12,676.95
Matthew Pham	Associate	\$414.00	25.9	\$10,722.60
Rachel Rosenblum	Associate	\$315.00	5.4	\$1,701.00
			88.3	\$53,937.90

The services in this category are associated with the litigation in the Receiver's disgorgement action against alleged profiting investors before this Court, in the matter captioned as *Winkler v. Reyner, et al.* and bearing Case No. 2:21-cv-05730-FMO-AFM (the "Reyner Action"). During the Application Period, Allen Matkins' work for this category spanned a variety of tasks primarily concerning discovery and settlement.

As to its discovery-related tasks, Allen Matkins spent time reviewing and analyzing documents for the Receiver's document production to the Reyner defendants, which ultimately resulted in the Receiver producing nearly 6,000 documents. Allen Matkins also expended a significant amount of time preparing the Receiver's responses to the Reyner defendants' extensive written discovery requests, which consisted of 56 total requests for production, 21 total interrogatories, and 165 total requests for admission.

As to its settlement-related tasks, Allen Matkins' work revolved around the parties' mandatory settlement conference before Judge MacKinnon that took place during the Application Period, with the firm developing a general settlement strategy with the Receiver, drafting the confidential settlement brief, attending the (ultimately unsuccessful) settlement conference, and engaging in continued settlement discussions with opposing counsel following the conference. Allen Matkins also spent time analyzing the Reyner defendants' Rule 68 offer of judgment, which the Receiver chose to not to accept. Once the parties exhausted

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1 their settlement discussions, Allen Matkins then turned its attention to summary
2 judgment in the Reyner Action.

3 **17. Emmons Litigation.**

4 In connection with the "Emmons 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	0.4	\$334.80
Michael Farrell	Partner	\$769.50	2.1	\$1,615.95
Joshua del Castillo	Partner	\$643.50	3.3	\$2,123.55
Matthew Pham	Associate	\$414.00	18.2	\$7,534.80
			24.0	\$11,609.10

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11 The services in this category are associated with the litigation in the

12 Receiver's disgorgement action against alleged profiting investors before this Court,

13 in the matter captioned as *Winkler v. Emmons, et al.* and bearing Case No. 2:21-cv-

14 07267-FMO-AFM (the "Emmons Action"). During the Application Period, Allen

15 Matkins' work in connection with the Emmons Action also revolved around

16 discovery and settlement. Allen Matkins first prepared the Receiver's extensive

17 responses to the Emmons defendants' 49 total interrogatories and 88 total requests

18 for admission and then drafted the Receiver's equally extensive requests for

19 production, interrogatories, and requests for admission (with each of the four

20 Emmons defendants propounded with distinct sets). Near the end of the Application

21 Period, Allen Matkins then turned its attention to preparing the Receiver's

22 confidential settlement brief for the mandatory settlement conference that would

23 take place after the Application Period. Though that settlement conference was

24 similarly unsuccessful, the parties have agreed to participate in a second session

25 before Judge MacKinnon, which the Receiver hopes will result in a settlement.

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18. **McCloskey Litigation.**

In connection with the "McCloskey Litigation" 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	1.0	\$837.00
Michael Farrell	Partner	\$769.50	23.4	\$18,006.30
Joshua del Castillo	Partner	\$643.50	11.8	\$7,593.30
Matthew Pham	Associate	\$414.00	34.5	\$14,283.00
			70.7	\$40,719.60

The services in this category are associated with the litigation in the Receiver's disgorgement action against alleged profiting investors before this Court, in the matter captioned as *Winkler v. McCloskey, et al.* and bearing Case No. 2:21-cv-05757-FMO-AFM (the "McCloskey Action"). During the Application Period, Allen Matkins' work for the McCloskey Action primarily related to discovery and settlement as well. Allen Matkins first collectively drafted four sets of requests for production, four sets of interrogatories, and two sets of requests for admission, which were propounded on the four McCloskey defendants. The firm then turned its attention to digging into and understanding the Receiver's more-complicated-than-usual accounting for the transactions between the McCloskey defendants and the Receivership Entities, developing both a litigation strategy and settlement approach for the McCloskey Action in light of that complicated accounting, preparing the Receiver's confidential settlement brief, and attending the mandatory settlement conference before Judge MacKinnon, which was similarly unsuccessful.

C. Expenses Incurred During the Application Period.

In connection with its services rendered to the Receiver during the Application Period, Allen Matkins incurred \$7,746.75 in expenses. Allen Matkins' invoices, attached hereto as **Exhibit 2**, detail each of the firm's expenses.

1 The substantial majority of Allen Matkins' expenses incurred during the
2 Application Period was on account of the monthly fees for hosting documents on an
3 e-discovery platform (ranging from roughly \$2,000 to \$2,500 each month and
4 totaling more than \$6,700 over the Application Period).

5 **V. MILLER KAPLAN'S FEES AND EXPENSES.**

6 **A. The Receiver's Retention of Miller Kaplan.**

7 Miller Kaplan was retained by the Receiver in February 2021. The Receiver
8 selected Miller Kaplan as his tax accountant due to the firm's expertise in handling
9 tax-related matters for fiduciaries.

10 **B. Services Rendered During the MK Application Period.**

11 During the MK Application Period, Miller Kaplan assisted the Receiver on a
12 number of tax-related matters.

13 Overall, on account of its services rendered to the Receiver during the MK
14 Application Period, Miller Kaplan billed 39.2 hours and \$7,736 in fees across the
15 following two categories:

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Category	Hours	Fees
General Consulting Services	1.5	\$645.00
Qualified Settlement Fund Services	37.7	\$7,091.00
	39.2	\$7,736.00

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20 Provided below are narrative summaries of the work performed under each of the
21 categories, and attached hereto as **Exhibit 4** are Miller Kaplan's invoices, containing
22 the billing entries detailing the tasks performed by the firm's personnel during the
23 MK Application Period.

24 **1. General Consulting Services.**

25 In connection with the "General Consulting Services" category, Miller Kaplan
26 billed 1.5 hours and \$645 in fees during the MK Application Period.

27 During the MK Application Period, for this category, Miller Kaplan's
28 professionals met and discussed the preparation of the Estate's tax returns.

1 **2. Qualified Settlement Fund Services.**

2 In connection with the "Qualified Settlement Fund Services" category, Miller
3 Kaplan billed 37.7 hours and \$7,091 in fees during the MK Application Period.

4 Miller Kaplan's work for this category during the MK Application Period was
5 comprised of gathering the applicable information needed for the preparation of the
6 Estate's tax returns and preparing such returns for tax years 2018 through 2021.

7 **C. Expenses Incurred During the MK Application Period.**

8 In connection with its services rendered on behalf of the Receivership Estate
9 during the MK Application Period, Miller Kaplan did not incur any expenses for
10 which it seeks reimbursement from the Receivership Estate.

11 **VI. 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 as of the date of the filing of this Fee Application, the SEC has not
24 indicated that it has substantive questions regarding, or will oppose, the Fee
25 Application.

26 **VII. CONCLUSION**

27 For the foregoing reasons, the Applicants respectfully request that the Court
28 enter an order:

- 1 1. Granting this Fee Application in its entirety;
- 2 2. Approving the Receiver's fees and expenses incurred during the
- 3 Application Period, in the respective amounts of \$115,043.50 and \$1,414.83;
- 4 3. Authorizing the Receiver to pay himself, on an interim basis, 80% of
- 5 his approved fees incurred during the Application Period, in the amount of
- 6 \$92,034.80, and 100% of his approved expenses incurred during the Application
- 7 Period, in the amount of \$1,414.83, from the funds of the Receivership Estate;
- 8 4. Approving Allen Matkins' fees and expenses incurred during the
- 9 Application Period, in the respective amounts of \$297,739.80 and \$7,746.75;
- 10 5. Authorizing the Receiver to pay Allen Matkins, on an interim basis,
- 11 80% of its approved fees incurred during the Application Period, in the amount of
- 12 \$238,191.84, and 100% of its approved expenses incurred during the Application
- 13 Period, in the amount of \$7,746.75, from the funds of the Receivership Estate;
- 14 6. Approving Miller Kaplan's fees and expenses incurred during the
- 15 MK Application Period, in the respective amounts of \$7,736 and \$0;
- 16 7. Authorizing the Receiver to pay Miller Kaplan, on an interim basis,
- 17 80% of its approved fees incurred during the MK Application Period, in the amount
- 18 of \$6,188.80, and 100% of its approved expenses incurred during the
- 19 MK Application Period, in the amount of \$0, from the funds of the Receivership
- 20 Estate; and
- 21 8. Providing such other and further relief as the Court deems just and
- 22 proper under the circumstances.

23 Dated: September 15, 2022

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

24
25
26 By: /s/ Matthew D. Pham

27 MATTHEW D. PHAM
28 Attorneys for Receiver
 GEOFF WINKLER

EXHIBIT 1

SEC v. Essex Capital Corporation
Summary of Fees of Receiver and Retained Personnel
April 1, 2022 - June 30, 2022
(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>
John Hall	Review and analysis of all outstanding assets and discuss liquidation to do items with	4/1/2022	0.5	279.00	139.50	Legal - Asset Analysis and Recovery
Milana Barkhanoy	Call with YKW and JBH reviewing and updating assets list	4/1/2022	0.5	225.00	112.50	Legal - Asset Analysis and Recovery
Geoff Winkler	Email communications with MBB re court documents upload to website	4/1/2022	0.1	315.00	31.50	Legal - Case Administration
John Hall	Troubleshooting and cleaning up case website, work with MBB.	4/1/2022	0.7	279.00	195.30	Legal - Case Administration
John Hall	Move a load of archive files from office to storage.	4/1/2022	0.6	279.00	167.40	Legal - Case Administration
John Hall	Email communication with MBB re court documents upload to website	4/1/2022	0.1	279.00	27.90	Legal - Case Administration
Milana Barkhanoy	Preparing and sending email notifications to web-site subscribers	4/1/2022	0.4	225.00	90.00	Legal - Case Administration
Ysabel Willits	Review assets and needed steps for liquidation with JBH and MBB.	4/1/2022	0.5	150.00	75.00	Legal - Case Administration
John Hall	Affected investor FAQ	4/1/2022	0.4	279.00	111.60	Legal - Claims Administration and Objections
John Hall	Call from affected claimant, FAQ.	4/1/2022	0.4	279.00	111.60	Legal - Claims Administration and Objections
John Hall	Review and provide SFARs to JC, review account 0010 transaction questions, categ	4/4/2022	2.4	279.00	669.60	Financial - Tax Issues
John Hall	Review documents from counsel, analysis and reconciliation against accounting recc	4/4/2022	0.7	279.00	195.30	Legal - Asset Analysis and Recovery
Josh McGraw	Communication with MBB about information for claimant inquiry	4/4/2022	0.1	225.00	22.50	Legal - Case Administration
Milana Barkhanoy	Multiple email communications from counsel re third-party litigation cases	4/4/2022	0.2	225.00	45.00	Legal - Case Administration
John Hall	Call with MBB discussing steps for the new forensic accounting task on R.L	4/5/2022	1.4	279.00	390.60	Financial - Litigation Consulting
Milana Barkhanoy	Call with JBH discussing steps for the new forensic accounting task on R.L	4/5/2022	1.4	225.00	315.00	Financial - Litigation Consulting
Ysabel Willits	Calling bank for tax information regarding brokerage account	4/5/2022	0.4	150.00	60.00	Financial - Tax Issues
John Hall	Review quarterly materials on UGI assets.	4/5/2022	0.4	279.00	111.60	Legal - Asset Analysis and Recovery
John Hall	Identify needed documents, create schedule and provide to MBB to guide accountin	4/5/2022	0.5	279.00	139.50	Legal - Asset Analysis and Recovery
John Hall	Email communication to MBB re new task for a third-party litigation	4/5/2022	0.4	279.00	111.60	Legal - Asset Analysis and Recovery
John Hall	Memo to MP detailing the document production process.	4/5/2022	0.3	279.00	83.70	Legal - Case Administration
Josh McGraw	Communication with MBB regarding claims distribution analysis	4/5/2022	0.1	225.00	22.50	Legal - Case Administration
Milana Barkhanoy	Email communications from M.W.; analyzing data and records to communicate findin	4/5/2022	0.7	225.00	157.50	Legal - Case Administration
Milana Barkhanoy	Email communication from JBH regarding new task, reviewing files	4/5/2022	0.4	225.00	90.00	Legal - Case Administration
John Hall	Communication from JBH re forensic accounting for third-party litigation	4/6/2022	0.1	279.00	27.90	Financial - Accounting/Auditing
John Hall	Review and update figures for draft accounting update report.	4/6/2022	2.3	279.00	641.70	Financial - Accounting/Auditing
Milana Barkhanoy	Forensic accounting: searching for and reconciling transactions for R.L; updating acc	4/6/2022	6.9	225.00	1,552.50	Financial - Litigation Consulting
John Hall	Discuss 1099 issues with YKW	4/6/2022	0.2	279.00	55.80	Financial - Tax Issues
Ysabel Willits	Updating JBH on tax information for brokerage accounts	4/6/2022	0.2	150.00	30.00	Financial - Tax Issues
Geoff Winkler	Review and edit draft pleadings	4/6/2022	0.3	315.00	94.50	Legal - Case Administration
John Hall	Review email and provide needed information to MP	4/6/2022	0.3	279.00	83.70	Legal - Case Administration
Josh McGraw	Locating documentation for mediation	4/6/2022	0.9	225.00	202.50	Legal - Case Administration
Milana Barkhanoy	Email communications from M.W.; analyzing data and records to communicate findin	4/6/2022	0.9	225.00	202.50	Legal - Case Administration
Milana Barkhanoy	Email from claimant's attorney	4/6/2022	0.1	225.00	22.50	Legal - Case Administration
John Hall	Affected investor FAQ.	4/6/2022	0.3	279.00	83.70	Legal - Claims Administration and Objections
John Hall	Review and redline revisions to forensic accounting report draft.	4/7/2022	3.6	279.00	1,004.40	Financial - Forensic Accounting
John Hall	Research and review files on investor, updates to accounting	4/7/2022	3.4	279.00	948.60	Financial - Litigation Consulting
John Hall	Work through accounting issues on RL litigation with MBB.	4/7/2022	0.6	279.00	167.40	Financial - Litigation Consulting
Milana Barkhanoy	Forensic accounting: searching for and reconciling transactions for R.L; updating acc	4/7/2022	5.8	225.00	1,305.00	Financial - Litigation Consulting
Milana Barkhanoy	Call with JBH reviewing accounting analysis for R.L;	4/7/2022	0.6	225.00	135.00	Financial - Litigation Consulting
Milana Barkhanoy	Summarizing findings on R.L. transactions into a new file for counsel; email communi	4/7/2022	1.7	225.00	382.50	Financial - Litigation Consulting
Geoff Winkler	Prepare medalion guarantee and call with bank to discuss	4/7/2022	0.3	315.00	94.50	Legal - Asset Disposition
Geoff Winkler	Team meeting to discuss outstanding tasks	4/7/2022	0.4	315.00	126.00	Legal - Case Administration
Geoff Winkler	Call with counsel to discuss outstanding tasks and current status	4/7/2022	0.7	315.00	220.50	Legal - Case Administration
John Hall	Team meeting with counsel.	4/7/2022	0.7	279.00	195.30	Legal - Case Administration
John Hall	Team meeting with GBW YKW MBB JPM to discuss ongoing work items.	4/7/2022	0.4	279.00	111.60	Legal - Case Administration
Josh McGraw	Team meeting with GBW, JBH, MBB and YKW discussing current and future tasks	4/7/2022	0.4	225.00	90.00	Legal - Case Administration

SEC v. Essex Capital Corporation
Summary of Fees of Receiver and Retained Personnel
April 1, 2022 - June 30, 2022
(Sorted in Chronological Order by Activity Category)

Attachment 1

Personnel	Item / Description	Date	Hours	Rate	Amount	Activity Category
Josh McGraw	Conversation with JBH regarding the distribution analysis and estimating expected di	4/7/2022	0.5	225.00	112.50	Legal - Case Administration
Josh McGraw	Review documentation to prepare for call with claimant	4/7/2022	0.6	225.00	135.00	Legal - Case Administration
Milana Barkhanoy	Team meeting with GBW, JBH, JPM and YKW discussing current and future tasks	4/7/2022	0.4	225.00	90.00	Legal - Case Administration
Milana Barkhanoy	Call with counsel to discuss litigation, next steps, planning	4/7/2022	0.7	225.00	157.50	Legal - Case Administration
Ysabel Willits	Team meeting with JPM, JBH, GBW, and MBB regarding upcoming and ongoing tasl	4/7/2022	0.3	150.00	45.00	Legal - Case Administration
John Hall	Review RL accounting records in old GL files.	4/8/2022	0.8	279.00	223.20	Legal - Asset Analysis and Recovery
John Hall	Review update from counsel; discuss with GBW; discuss with MBB.	4/8/2022	0.4	279.00	111.60	Legal - Asset Analysis and Recovery
Geoff Winkler	Settlement conference	4/8/2022	3.3	315.00	1,039.50	Legal - Case Administration
Milana Barkhanoy	Emails from JBH and counsel on R.L.	4/8/2022	0.2	225.00	45.00	Legal - Case Administration
Milana Barkhanoy	Quick chat with JBH regarding MBT 3331 task	4/11/2022	0.1	225.00	22.50	Financial - Data Analysis
Geoff Winkler	Review QSF information, research, emails with counsel	4/11/2022	0.3	315.00	94.50	Financial - Tax Issues
John Hall	Review and prepare documentation on 2019 sales tax issues (3.0); Call and discuss	4/11/2022	4.9	279.00	1,367.10	Financial - Tax Issues
John Hall	Review of needed tax items, pull reports and categorize 2018, 2019 transactions, prc	4/11/2022	2.4	279.00	669.60	Financial - Tax Issues
John Hall	Review investment results and provide K1 for Upfront III to MK	4/11/2022	0.3	279.00	83.70	Financial - Tax Issues
Geoff Winkler	Discussion with counsel re final payment of clawback settlement	4/11/2022	0.2	315.00	63.00	Legal - Asset Analysis and Recovery
John Hall	Quick check in with MBB regarding assets	4/11/2022	0.1	279.00	27.90	Legal - Asset Analysis and Recovery
Milana Barkhanoy	Updating list of assets and their statuses; communication with YKW	4/11/2022	1.6	225.00	360.00	Legal - Asset Analysis and Recovery
Milana Barkhanoy	Quick check in with JBH regarding assets	4/11/2022	0.1	225.00	22.50	Legal - Asset Analysis and Recovery
Milana Barkhanoy	Email communications to and from JBH regarding asset U.G.I	4/11/2022	0.2	225.00	45.00	Legal - Asset Analysis and Recovery
Milana Barkhanoy	Testing access to U.G.I website to review K-1; analyzing documents	4/11/2022	0.5	225.00	112.50	Legal - Asset Analysis and Recovery
Geoff Winkler	Complete letter of transmittal, discuss with MW	4/11/2022	0.3	315.00	94.50	Legal - Asset Disposition
Geoff Winkler	Process AR	4/11/2022	0.1	315.00	31.50	Legal - Case Administration
Geoff Winkler	Meeting to discuss outstanding tasks	4/11/2022	0.2	315.00	63.00	Legal - Case Administration
John Hall	Team meeting to discuss ongoing casework.	4/11/2022	0.2	279.00	55.80	Legal - Case Administration
Josh McGraw	Review transactions to ensure accurate billing	4/11/2022	0.1	225.00	22.50	Legal - Case Administration
Josh McGraw	Call with LCH to answer questions regarding the distribution and milestones to compl	4/11/2022	0.3	225.00	67.50	Legal - Case Administration
Milana Barkhanoy	Team meeting with GBW, JBH, JPM, YKW and SBP discussing current and future ta	4/11/2022	0.2	225.00	45.00	Legal - Case Administration
Milana Barkhanoy	Review and reconcile transactions to ensure accurate billing	4/11/2022	1.0	225.00	225.00	Legal - Case Administration
Ysabel Willits	Team meeting with JPM, JBH, GBW, and MBB regarding upcoming and ongoing tasl	4/11/2022	0.2	150.00	30.00	Legal - Case Administration
Geoff Winkler	Review final draft report, comments to counsel, emails with counsel re updates	4/12/2022	0.3	315.00	94.50	Financial - Accounting/Auditing
Geoff Winkler	Review invoices, process	4/12/2022	0.2	315.00	63.00	Financial - Accounting/Auditing
Milana Barkhanoy	Review and update MBT 3331 transactions	4/12/2022	1.6	225.00	360.00	Financial - Accounting/Auditing
John Hall	Review of updated accounting report for accuracy and completeness.	4/12/2022	3.2	279.00	892.80	Financial - Forensic Accounting
Milana Barkhanoy	Updating list of assets and their statuses	4/12/2022	1.4	225.00	315.00	Legal - Asset Analysis and Recovery
Geoff Winkler	Review QSF issues with JBH	4/12/2022	0.3	315.00	94.50	Legal - Case Administration
Ysabel Willits	Reviewing time to present accurate billing	4/12/2022	1.0	150.00	150.00	Legal - Case Administration
Ysabel Willits	Meeting with MBB regarding bank statement task	4/12/2022	0.1	150.00	15.00	Legal - Case Administration
John Hall	Analysis of CVL data and memo to GBW confirming position.	4/13/2022	0.5	279.00	139.50	Financial - Litigation Consulting
Milana Barkhanoy	Accounting analysis: searching for and reconciling transactions for W.R.	4/13/2022	2.3	225.00	517.50	Financial - Litigation Consulting
Geoff Winkler	Review and analyze documents sent by opposing counsel re clawback litigation	4/13/2022	0.3	315.00	94.50	Legal - Asset Analysis and Recovery
Geoff Winkler	Review request from trust company, review information, emails with JPM	4/13/2022	0.2	315.00	63.00	Legal - Case Administration
Geoff Winkler	Review litigation agenda	4/13/2022	0.1	315.00	31.50	Legal - Case Administration
Geoff Winkler	Call with investor	4/13/2022	0.3	315.00	94.50	Legal - Case Administration
John Hall	Communication with MBB regarding third-party litigations	4/13/2022	0.1	279.00	27.90	Legal - Case Administration
John Hall	Review memo from counsel and materials in preparation for upcoming team call. Dis	4/13/2022	0.6	279.00	167.40	Legal - Case Administration
Josh McGraw	Email to GBW regarding email from the trust of claimant	4/13/2022	0.1	225.00	22.50	Legal - Case Administration
Josh McGraw	Email to claimant requesting valuation of the receivership	4/13/2022	0.1	225.00	22.50	Legal - Case Administration

SEC v. Essex Capital Corporation
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Milana Barkhanoy	Email from counsel regarding third-party litigations; updating notes	4/13/2022	0.3	225.00	67.50	Legal - Case Administration
Milana Barkhanoy	Communication with JBH regarding third-party litigations	4/13/2022	0.2	225.00	45.00	Legal - Case Administration
John Hall	Review and corroborate finding in updated accounting report.	4/14/2022	3.2	279.00	892.80	Financial - Accounting/Auditing
Milana Barkhanoy	Analyzing transactions and consolidating finding on W.R. ; email to JBH	4/14/2022	1.1	225.00	247.50	Financial - Litigation Consulting
Milana Barkhanoy	Call with JBH reviewing forensic accounting for third party litigation case	4/14/2022	0.5	225.00	112.50	Financial - Litigation Consulting
John Hall	Review WR file with MBB	4/14/2022	0.5	279.00	139.50	Legal - Asset Analysis and Recovery
Milana Barkhanoy	Forensic accounting: searching for and reconciling transactions for W.R.; making upc	4/14/2022	3.7	225.00	832.50	Legal - Asset Analysis and Recovery
Milana Barkhanoy	Communication with JPM regarding search for bank statements for W.R.	4/14/2022	0.2	225.00	45.00	Legal - Asset Analysis and Recovery
Geoff Winkler	Call with interested party re case status, observations	4/14/2022	0.4	315.00	126.00	Legal - Case Administration
John Hall	Team call with counsel to discuss ongoing case needs.	4/14/2022	0.5	279.00	139.50	Legal - Case Administration
Josh McGraw	Locating bank account statements for discovery	4/14/2022	0.6	225.00	135.00	Legal - Case Administration
Milana Barkhanoy	Email from counsel; reviewing documents for W.R.; taking notes	4/14/2022	0.5	225.00	112.50	Legal - Case Administration
Milana Barkhanoy	Emails with JBH	4/14/2022	0.1	225.00	22.50	Legal - Case Administration
Milana Barkhanoy	Call with counsel to discuss litigation, next steps, planning	4/14/2022	0.5	225.00	112.50	Legal - Case Administration
Geoff Winkler	Review accounting, discussion with JBH, discussion with counsel	4/15/2022	0.3	315.00	94.50	Financial - Accounting/Auditing
Milana Barkhanoy	Quick check in with JBH regarding forensic accounting for R.	4/15/2022	0.1	225.00	22.50	Financial - Litigation Consulting
Milana Barkhanoy	Categorizing and summarizing transactions for third-party litigations for CVL WR	4/15/2022	2.5	225.00	562.50	Financial - Litigation Consulting
John Hall	Processing application for TIN for QSF, call to IRS.	4/15/2022	2.3	279.00	641.70	Financial - Tax Issues
John Hall	Review mediation statement, analysis of data, comparison of finding, memo to GBW	4/15/2022	1.8	279.00	502.20	Legal - Asset Analysis and Recovery
Geoff Winkler	Emails with MW re medallion	4/15/2022	0.1	315.00	31.50	Legal - Asset Disposition
Geoff Winkler	Review settlement conference notice, review dates, emails with counsel re availabilit	4/15/2022	0.2	315.00	63.00	Legal - Case Administration
Geoff Winkler	Review draft mediation statement	4/15/2022	0.2	315.00	63.00	Legal - Case Administration
Josh McGraw	Call with claimant requesting an update on distribution timeline and overall case	4/15/2022	0.7	225.00	157.50	Legal - Case Administration
Milana Barkhanoy	Auditing and saving expense receipts	4/15/2022	0.2	225.00	45.00	Legal - Case Administration
Milana Barkhanoy	Communication with JBH regarding transactions for third-party litigations for W.R.	4/15/2022	0.2	225.00	45.00	Legal - Case Administration
Ysabel Willits	Running bank statements through conversion software and reviewing transactions	4/18/2022	0.8	150.00	120.00	Financial - Accounting/Auditing
Milana Barkhanoy	Quick check in with YKW regarding MBT 3331	4/18/2022	0.1	225.00	22.50	Financial - Data Analysis
Milana Barkhanoy	Call with YKW reviewing process to convert MBT 3331 statements into Excel throug	4/18/2022	0.5	225.00	112.50	Financial - Data Analysis
Ysabel Willits	Call with MBB regarding conversion software for bank statements and data analysis	4/18/2022	0.6	150.00	90.00	Financial - Data Analysis
Geoff Winkler	Review tax filing, payment	4/18/2022	0.2	315.00	63.00	Financial - Tax Issues
John Hall	Conversation with JPM regarding tax extension	4/18/2022	0.1	279.00	27.90	Financial - Tax Issues
John Hall	Work through EIN verification issues with IRS.	4/18/2022	1.5	279.00	418.50	Financial - Tax Issues
John Hall	Discuss needs with MK, call IRS customer service, produce and execute extension p	4/18/2022	2.5	279.00	697.50	Financial - Tax Issues
Josh McGraw	Sending certified extension for 2021 taxes and filing documentation for future referen	4/18/2022	1.0	225.00	225.00	Financial - Tax Issues
Josh McGraw	Conversation with JBH regarding tax extension and email follow-up	4/18/2022	0.2	225.00	45.00	Financial - Tax Issues
Geoff Winkler	Discussion with counsel re site visit	4/18/2022	0.2	315.00	63.00	Legal - Asset Analysis and Recovery
John Hall	Review of RL files (.5) and reconcile with MBB to provide to counsel (.5).	4/18/2022	1.0	279.00	279.00	Legal - Asset Analysis and Recovery
Geoff Winkler	Emails with counsel re availability	4/18/2022	0.1	315.00	31.50	Legal - Case Administration
Geoff Winkler	Respond to counsel request re additional timing	4/18/2022	0.1	315.00	31.50	Legal - Case Administration
Geoff Winkler	Review EIN and QSF related issues	4/18/2022	0.2	315.00	63.00	Legal - Case Administration
Geoff Winkler	Team meeting discussing current and future tasks	4/18/2022	0.1	315.00	31.50	Legal - Case Administration
John Hall	Case meeting with team.	4/18/2022	0.1	279.00	27.90	Legal - Case Administration
John Hall	Archive boxes of investor and litigation files, transfer to storage.	4/18/2022	0.6	279.00	167.40	Legal - Case Administration
Josh McGraw	Call with YKW to discuss accounting needs	4/18/2022	0.2	225.00	45.00	Legal - Case Administration
Josh McGraw	Team meeting with GBW, JBH, MBB and YKW discussing current and future tasks	4/18/2022	0.1	225.00	22.50	Legal - Case Administration

SEC v. Essex Capital Corporation
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Milana Barkhanoy	Team meeting with GBW, JBH, JPM, YKW and SBP discussing current and future ta	4/18/2022	0.1	225.00	22.50	Legal - Case Administration
Milana Barkhanoy	Gathering data and preparing summary for counsel, email notification to JBH request	4/18/2022	0.9	225.00	202.50	Legal - Case Administration
Milana Barkhanoy	Call with JBH reviewing forensic accounting and findings for R.L.	4/18/2022	0.5	225.00	112.50	Legal - Case Administration
Milana Barkhanoy	Email to counsel with update on supporting documents for R.L.	4/18/2022	0.1	225.00	22.50	Legal - Case Administration
Milana Barkhanoy	Email from JBH regarding R.L. supporting documents	4/18/2022	0.1	225.00	22.50	Legal - Case Administration
Milana Barkhanoy	Email from counsel regarding R.L. supporting documents	4/18/2022	0.1	225.00	22.50	Legal - Case Administration
Milana Barkhanoy	Email to counsel regarding R.L. supporting documents	4/18/2022	0.1	225.00	22.50	Legal - Case Administration
Milana Barkhanoy	Email to JBH regarding R.L. supporting documents	4/18/2022	0.1	225.00	22.50	Legal - Case Administration
Milana Barkhanoy	Searching for supporting documents requested by counsel	4/18/2022	3.1	225.00	697.50	Legal - Case Administration
Ysabel Willits	Meeting with JPM regarding conversion software for bank statements	4/18/2022	0.2	150.00	30.00	Legal - Case Administration
Ysabel Willits	Team meeting with JPM, JBH, and MBB regarding upcoming and ongoing tasks	4/18/2022	0.1	150.00	15.00	Legal - Case Administration
Ysabel Willits	Running bank statements through conversion software and reviewing transactions	4/19/2022	0.3	150.00	45.00	Financial - Accounting/Auditing
John Hall	Review Upfront equity investment quarterly report, update asset and memo to file.	4/19/2022	0.3	279.00	83.70	Legal - Asset Disposition
Geoff Winkler	Review and respond to email from claimant counsel	4/19/2022	0.1	315.00	31.50	Legal - Case Administration
Geoff Winkler	Call with claimant	4/19/2022	0.2	315.00	63.00	Legal - Case Administration
John Hall	Affected party FAQ call.	4/19/2022	0.3	279.00	83.70	Legal - Case Administration
Josh McGraw	Review time entries, edit, and sanity check for appropriateness	4/19/2022	0.1	225.00	22.50	Legal - Case Administration
Milana Barkhanoy	Email from JBH re claimant inquiry	4/19/2022	0.1	225.00	22.50	Legal - Case Administration
Milana Barkhanoy	Email from a claimant re case update	4/19/2022	0.1	225.00	22.50	Legal - Case Administration
Geoff Winkler	Process documents and payments	4/20/2022	0.2	315.00	63.00	Financial - Accounting/Auditing
Ysabel Willits	Running bank statements through conversion software and reviewing transactions	4/20/2022	0.4	150.00	60.00	Financial - Accounting/Auditing
John Hall	Discuss tax issues with GBW and MBB, email to MK detailing needs to determine dis	4/20/2022	0.5	279.00	139.50	Financial - Tax Issues
Geoff Winkler	Call with counsel re RL mediation	4/20/2022	0.2	315.00	63.00	Legal - Asset Analysis and Recovery
John Hall	Review request from counsel, pull and analyze data and answer time based calculati	4/20/2022	1.9	279.00	530.10	Legal - Asset Analysis and Recovery
Geoff Winkler	Emails with MBB on new court filings, determining next steps to update website	4/20/2022	0.2	315.00	63.00	Legal - Case Administration
Geoff Winkler	Email from MBB re website update	4/20/2022	0.1	315.00	31.50	Legal - Case Administration
John Hall	Email from MBB re website update	4/20/2022	0.1	279.00	27.90	Legal - Case Administration
John Hall	Review memo from MBB, three pleadings and discuss with MBB and GBW,	4/20/2022	0.3	279.00	83.70	Legal - Case Administration
John Hall	Review orders and discuss with GBW,	4/20/2022	0.4	279.00	111.60	Legal - Case Administration
John Hall	Case meeting with GBW and MP	4/20/2022	0.2	279.00	55.80	Legal - Case Administration
Milana Barkhanoy	Emails from counsel on court filings	4/20/2022	0.2	225.00	45.00	Legal - Case Administration
Milana Barkhanoy	Emails with GBW on new court filings, determining next steps to update website	4/20/2022	0.2	225.00	45.00	Legal - Case Administration
Milana Barkhanoy	Uploading new court filings into website; sending notifications	4/20/2022	0.5	225.00	112.50	Legal - Case Administration
Milana Barkhanoy	Email to JBH and GBW regarding website update	4/20/2022	0.1	225.00	22.50	Legal - Case Administration
Geoff Winkler	Review court orders, discuss	4/20/2022	0.2	315.00	63.00	Legal - Claims Administration and Objections
John Hall	Affected investor FAQ	4/20/2022	0.3	279.00	83.70	Legal - Claims Administration and Objections
Geoff Winkler	Update accounting, records	4/21/2022	0.3	315.00	94.50	Financial - Accounting/Auditing
John Hall	Send instructions and memo to team on accounting documentary support needs.	4/21/2022	0.5	279.00	139.50	Financial - Accounting/Auditing
Ysabel Willits	Running bank statements through conversion software and editing and reviewing trar	4/21/2022	1.3	150.00	195.00	Financial - Accounting/Auditing
John Hall	Review WR accounting from MP, reconcile with internal accounting file.	4/21/2022	1.0	279.00	279.00	Financial - Litigation Consulting
Geoff Winkler	Call with counsel to discuss upcoming settlement conferences, litigation, supplement	4/21/2022	1.0	315.00	315.00	Legal - Case Administration
Geoff Winkler	Emails with counsel re discovery	4/21/2022	0.1	315.00	31.50	Legal - Case Administration
Geoff Winkler	Emails with MBB re documents, notices	4/21/2022	0.1	315.00	31.50	Legal - Case Administration
Geoff Winkler	Review email from counsel re accounting, respond	4/21/2022	0.2	315.00	63.00	Legal - Case Administration
Josh McGraw	Review email from JBH regarding accounting needs for WR third party matter	4/21/2022	0.2	225.00	45.00	Legal - Case Administration
John Hall	Review MBT 3331 account, discuss with GBW and request additional info from YKW	4/22/2022	1.0	279.00	279.00	Financial - Accounting/Auditing
Ysabel Willits	Running bank statements through conversion software and editing and reviewing trar	4/22/2022	6.0	150.00	900.00	Financial - Accounting/Auditing

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John Hall	Pull requested check copies for MBB.	4/22/2022	0.4	279.00	111.60	Legal - Asset Analysis and Recovery
John Hall	Review set one and set two of WR interrogatories. Research and analyze response,	4/22/2022	2.9	279.00	809.10	Legal - Asset Analysis and Recovery
Geoff Winkler	Communication with MBB regarding website update notifications; reviewing updated	4/22/2022	0.4	315.00	126.00	Legal - Case Administration
Josh McGraw	Meeting with YKW regarding WR third-party matter	4/22/2022	0.2	225.00	45.00	Legal - Case Administration
Josh McGraw	Communication with JBH and MBB regarding conversion of financial institution accou	4/22/2022	0.1	225.00	22.50	Legal - Case Administration
Josh McGraw	Reviewing communication from JBH regarding WR third-party matter	4/22/2022	0.2	225.00	45.00	Legal - Case Administration
Milana Barkhanoy	Summarizing findings for document reconciliation for R.; communication with JBH, JF	4/22/2022	0.5	225.00	112.50	Legal - Case Administration
Milana Barkhanoy	Call with JBH reviewing updated list of documents for third-party litigation (R.); deterr	4/22/2022	0.4	225.00	90.00	Legal - Case Administration
Milana Barkhanoy	Searching for missing documents for third-party litigation, reconciling against docume	4/22/2022	1.7	225.00	382.50	Legal - Case Administration
Milana Barkhanoy	Communication with JBH and JPM regarding MBT 3331	4/22/2022	0.1	225.00	22.50	Legal - Case Administration
Milana Barkhanoy	Compiling findings and summarizing report for counsel on document reconciliation fo	4/22/2022	2.2	225.00	495.00	Legal - Case Administration
Milana Barkhanoy	Communication with GBW regarding website update notifications; updating template	4/22/2022	0.4	225.00	90.00	Legal - Case Administration
Milana Barkhanoy	Email communication to and from JBH on third-party litigation supporting documents	4/22/2022	0.2	225.00	45.00	Legal - Case Administration
Milana Barkhanoy	Communication to and from YKW regarding documents for third party litigation (R.)	4/22/2022	0.2	225.00	45.00	Legal - Case Administration
Milana Barkhanoy	Email from JBH regarding documents for third-party litigation (R.); reviewing docume	4/22/2022	0.5	225.00	112.50	Legal - Case Administration
Milana Barkhanoy	Communication with YKW regarding MBT 3331	4/22/2022	0.1	225.00	22.50	Legal - Case Administration
Milana Barkhanoy	Reconciling documents for third-party litigation (R.) from counsel against accounting f	4/22/2022	4.0	225.00	900.00	Legal - Case Administration
Ysabel Willits	Writing memo to GBW and JBH regarding bank statement conversion	4/22/2022	0.2	150.00	30.00	Legal - Case Administration
Ysabel Willits	Meeting with JPM regarding task to gather supporting documents	4/22/2022	0.2	150.00	30.00	Legal - Case Administration
Ysabel Willits	Communication with MBB regarding documents for third-party litigation	4/22/2022	0.2	150.00	30.00	Legal - Case Administration
Ysabel Willits	Communication with MBB regarding bank statement conversion task	4/22/2022	0.1	150.00	15.00	Legal - Case Administration
John Hall	Work with MBB to determine possible payout scenarios to determine appropriate initi	4/22/2022	0.5	279.00	139.50	Legal - Claims Administration and Objections
Geoff Winkler	Draft SFAR report	4/25/2022	2.6	315.00	819.00	Financial - Accounting/Auditing
Ysabel Willits	Running bank statements through conversion software and editing and reviewing trar	4/25/2022	1.1	150.00	165.00	Financial - Accounting/Auditing
Geoff Winkler	Review response to interrogatories and request for admissions.	4/25/2022	0.4	315.00	126.00	Legal - Asset Analysis and Recovery
John Hall	Review discovery responses from counsel, compare against records, replay with nee	4/25/2022	3.4	279.00	948.60	Legal - Asset Analysis and Recovery
John Hall	Discuss outstanding RFA issues with counsel.	4/25/2022	0.7	279.00	195.30	Legal - Asset Analysis and Recovery
Geoff Winkler	Team call to discuss outstanding tasks	4/25/2022	0.1	315.00	31.50	Legal - Case Administration
John Hall	Team call to discuss ongoing case needs.	4/25/2022	0.1	279.00	27.90	Legal - Case Administration
John Hall	Conversation with JPM regarding claimant distributions	4/25/2022	0.1	279.00	27.90	Legal - Case Administration
Josh McGraw	Call with YKW to discuss distribution analysis	4/25/2022	0.1	225.00	22.50	Legal - Case Administration
Josh McGraw	Team meeting with GBW, JBH, MBB and YKW discussing current and future tasks	4/25/2022	0.1	225.00	22.50	Legal - Case Administration
Josh McGraw	Conversation with JBH regarding claimant distributions	4/25/2022	0.1	225.00	22.50	Legal - Case Administration
Josh McGraw	Call with investor regarding the distribution plan	4/25/2022	0.3	225.00	67.50	Legal - Case Administration
Milana Barkhanoy	Team meeting with GBW, JBH, JPM, YKW discussing current and future tasks	4/25/2022	0.1	225.00	22.50	Legal - Case Administration
Ysabel Willits	Meeting with JPM regarding upcoming claims task	4/25/2022	0.1	150.00	15.00	Legal - Case Administration
Ysabel Willits	Team meeting with JPM, JBH, and MBB regarding upcoming and ongoing tasks	4/25/2022	0.1	150.00	15.00	Legal - Case Administration
Ysabel Willits	Running bank statements through conversion software and editing and reviewing trar	4/26/2022	0.4	150.00	60.00	Financial - Accounting/Auditing
Geoff Winkler	Call with counsel to discuss potential settlement	4/26/2022	0.4	315.00	126.00	Legal - Case Administration
Geoff Winkler	Review responses, emails with counsel	4/26/2022	0.2	315.00	63.00	Legal - Case Administration
Josh McGraw	Call with investor regarding the recent pleadings	4/26/2022	0.3	225.00	67.50	Legal - Case Administration
Josh McGraw	Meeting with YKW regarding communication with investors regarding next steps for t	4/26/2022	0.3	225.00	67.50	Legal - Case Administration
Ysabel Willits	Meeting with JPM regarding communication with investors regarding next steps for di	4/26/2022	0.3	150.00	45.00	Legal - Case Administration
Josh McGraw	Communication with MBB regarding claimant communication	4/26/2022	0.1	225.00	22.50	Legal - Claims Administration and Objections
Josh McGraw	Chats with MBB regarding claimant communication	4/26/2022	0.2	225.00	45.00	Legal - Claims Administration and Objections
Josh McGraw	Call with MBB regarding distribution plan and communication with claimants	4/26/2022	0.4	225.00	90.00	Legal - Claims Administration and Objections

SEC v. Essex Capital Corporation
Summary of Fees of Receiver and Retained Personnel
April 1, 2022 - June 30, 2022
(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>
Milana Barkhanoy	Chats with JPM regarding claimant communication	4/26/2022	0.2	225.00	45.00	Legal - Claims Administration and Objections
Milana Barkhanoy	Call with JPM discussing strategy for claimant communication and claims calculation	4/26/2022	0.4	225.00	90.00	Legal - Claims Administration and Objections
Ysabel Willits	Running bank statements through conversion software and editing and reviewing trar	4/27/2022	1.3	150.00	195.00	Financial - Accounting/Auditing
Geoff Winkler	Settlement conference	4/27/2022	2.2	315.00	693.00	Legal - Asset Analysis and Recovery
John Hall	Review documents from Chinese taxing authority, review files on E2Open, Sunrise Ir	4/27/2022	1.5	279.00	418.50	Legal - Asset Analysis and Recovery
Geoff Winkler	Emails with MW re guarantee	4/27/2022	0.1	315.00	31.50	Legal - Asset Disposition
Geoff Winkler	Call with counsel to discuss upcoming settlement conference	4/27/2022	0.3	315.00	94.50	Legal - Case Administration
Geoff Winkler	Call with counsel to discuss potential settlement	4/27/2022	0.2	315.00	63.00	Legal - Case Administration
Geoff Winkler	Emails with MW re medallion guarantee	4/27/2022	0.1	315.00	31.50	Legal - Case Administration
Geoff Winkler	Review letter from third party, email to counsel	4/27/2022	0.1	315.00	31.50	Legal - Case Administration
Geoff Winkler	Review tax certificate issue, discuss with JBH, email with counsel	4/27/2022	0.2	315.00	63.00	Legal - Case Administration
Geoff Winkler	Review records, statement to prepare for conference	4/27/2022	0.4	315.00	126.00	Legal - Case Administration
Geoff Winkler	Review letter from third party re document request, discuss with counsel	4/27/2022	0.2	315.00	63.00	Legal - Case Administration
Ysabel Willits	Running bank statements through conversion software and editing and reviewing trar	4/28/2022	3.4	150.00	510.00	Financial - Accounting/Auditing
Geoff Winkler	Quick check-in with MBB regarding call with counsel	4/28/2022	0.1	315.00	31.50	Legal - Case Administration
John Hall	Quick check-in with MBB regarding call with counsel	4/28/2022	0.1	279.00	27.90	Legal - Case Administration
John Hall	Moving and storing case documents.	4/28/2022	0.5	279.00	139.50	Legal - Case Administration
Milana Barkhanoy	Analyzing reports and other documents to create F.A.Q for claimant communication	4/28/2022	0.5	225.00	112.50	Legal - Case Administration
Milana Barkhanoy	Quick check-in with JBH and GBW regarding call with counsel	4/28/2022	0.1	225.00	22.50	Legal - Case Administration
Milana Barkhanoy	Reviewing case legal update from counsel	4/28/2022	0.1	225.00	22.50	Legal - Case Administration
Milana Barkhanoy	Gathering information and responding to a claimant	4/28/2022	0.4	225.00	90.00	Legal - Claims Administration and Objections
Ysabel Willits	Running bank statements through conversion software and editing and reviewing trar	4/29/2022	4.3	150.00	645.00	Financial - Accounting/Auditing
Geoff Winkler	Call with vendor re storage options	4/29/2022	0.2	315.00	63.00	Legal - Case Administration
Geoff Winkler	Review executed settlement, provide payment information	4/29/2022	0.2	315.00	63.00	Legal - Case Administration
Milana Barkhanoy	Communication with JBH regarding claim payment distribution and next steps	4/29/2022	0.5	225.00	112.50	Legal - Case Administration
Milana Barkhanoy	Analyzing report to create F.A.Q for claimant communication	4/29/2022	0.6	225.00	135.00	Legal - Case Administration
John Hall	Analysis and review of accounting file and pulling needed documents from Valid8 for	5/2/2022	2.2	279.00	613.80	Financial - Accounting/Auditing
Ysabel Willits	Running bank statements through conversion software and editing and reviewing trar	5/2/2022	5.2	150.00	780.00	Financial - Accounting/Auditing
Milana Barkhanoy	Chats with YKW regarding MBT project to digitize bank statements	5/2/2022	0.2	225.00	45.00	Financial - Litigation Consulting
Milana Barkhanoy	Call with YKW digitizing bank statements for MBT	5/2/2022	0.8	225.00	180.00	Financial - Litigation Consulting
Ysabel Willits	Meeting with MBB regarding bank statement conversion	5/2/2022	0.8	150.00	120.00	Financial - Litigation Consulting
Amanda Deering	Call with MBB discussing next steps in payment redistribution	5/2/2022	0.1	225.00	22.50	Legal - Asset Analysis and Recovery
John Hall	Review two sets of RFA and ROGs for accuracy and confirmation to MH with needer	5/2/2022	3.8	279.00	1,060.20	Legal - Asset Analysis and Recovery
Milana Barkhanoy	Call with AMD discussing next steps in claim payment distribution	5/2/2022	0.1	225.00	22.50	Legal - Asset Analysis and Recovery
Ysabel Willits	Communication with MBB regarding digitizing bank statements	5/2/2022	0.2	150.00	30.00	Legal - Asset Analysis and Recovery
Amanda Deering	Team meeting with GBW, JBH, JPM, YKW, MBB discussing current and future tasks	5/2/2022	0.2	225.00	45.00	Legal - Case Administration
Geoff Winkler	Review settlement information, emails with counsel, wire instructions	5/2/2022	0.1	315.00	31.50	Legal - Case Administration
Geoff Winkler	Emails with counsel re discovery responses	5/2/2022	0.1	315.00	31.50	Legal - Case Administration
Geoff Winkler	Review discovery response for two cases (RFA & ROG)	5/2/2022	0.4	315.00	126.00	Legal - Case Administration
Geoff Winkler	Review discovery update	5/2/2022	0.1	315.00	31.50	Legal - Case Administration
Geoff Winkler	Email with counsel re filing	5/2/2022	0.1	315.00	31.50	Legal - Case Administration
Geoff Winkler	Team call to discuss outstanding tasks	5/2/2022	0.2	315.00	63.00	Legal - Case Administration
Geoff Winkler	Emails with MJ re settlement progress	5/2/2022	0.1	315.00	31.50	Legal - Case Administration
John Hall	Team meeting with GBW, JBH, JPM, YKW, MBB discussing current and future tasks	5/2/2022	0.2	279.00	55.80	Legal - Case Administration
Josh McGraw	Team meeting with GBW, JBH, MBB and YKW discussing current and future tasks	5/2/2022	0.2	225.00	45.00	Legal - Case Administration
Josh McGraw	Processing mail and sending email to MBB for next steps	5/2/2022	0.2	225.00	45.00	Legal - Case Administration

SEC v. Essex Capital Corporation
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April 1, 2022 - June 30, 2022
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Attachment 1

<u>Personnel</u>	<u>Item / Description</u>	<u>Date</u>	<u>Hours</u>	<u>Rate</u>	<u>Amount</u>	<u>Activity Category</u>
Milana Barkhanoy	Team meeting with GBW, JBH, JPM, YKW, AMD discussing current and future tasks	5/2/2022	0.2	225.00	45.00	Legal - Case Administration
Ysabel Willits	Team meeting with JPM, JBH, GBW, AMD, and MBB regarding upcoming and ongoing	5/2/2022	0.2	150.00	30.00	Legal - Case Administration
John Hall	Review MBT 3331 transactions compiled from YKW, analysis. Discuss outstanding items	5/3/2022	2.6	279.00	725.40	Financial - Accounting/Auditing
Milana Barkhanoy	Chats with YKW regarding MBT statement digitalization	5/3/2022	0.2	225.00	45.00	Financial - Litigation Consulting
Ysabel Willits	Running bank statements through conversion software and editing and reviewing transactions	5/3/2022	7.3	150.00	1,095.00	Financial - Litigation Consulting
Ysabel Willits	Communication with MBB regarding digitizing bank statements	5/3/2022	0.2	150.00	30.00	Financial - Litigation Consulting
Geoff Winkler	Review settlement and declaration, email with counsel	5/3/2022	0.2	315.00	63.00	Legal - Case Administration
Milana Barkhanoy	Reviewing third-party litigation update from counsel, updating tracker	5/3/2022	0.1	225.00	22.50	Legal - Case Administration
Ysabel Willits	Running bank statements through conversion software and editing and reviewing transactions	5/4/2022	8.2	150.00	1,230.00	Financial - Accounting/Auditing
Amanda Deering	Conversation with AMD regarding case status and investor communication	5/4/2022	0.2	225.00	45.00	Legal - Case Administration
Amanda Deering	Conversation with JPM regarding case status and investor communication	5/4/2022	0.2	225.00	45.00	Legal - Case Administration
Geoff Winkler	Review distribution motion and order, discuss with parties	5/4/2022	0.3	315.00	94.50	Legal - Case Administration
Josh McGraw	Conversation with AMD regarding case status and investor communication	5/4/2022	0.2	225.00	45.00	Legal - Case Administration
Josh McGraw	Communication with YKW regarding communication with investors	5/4/2022	0.2	225.00	45.00	Legal - Case Administration
Ysabel Willits	Investor correspondence to update on claims process	5/4/2022	0.2	150.00	30.00	Legal - Case Administration
Josh McGraw	Call with MBB to discuss distribution analysis and determine next steps	5/4/2022	0.3	225.00	67.50	Legal - Claims Administration and Objections
Milana Barkhanoy	Call with JPM to discuss distribution analysis and determine next steps	5/4/2022	0.3	225.00	67.50	Legal - Claims Administration and Objections
Geoff Winkler	Review email re accounting update	5/5/2022	0.1	315.00	31.50	Financial - Accounting/Auditing
Ysabel Willits	Running bank statements through conversion software and editing and reviewing transactions	5/5/2022	9.0	150.00	1,350.00	Financial - Accounting/Auditing
Milana Barkhanoy	Chats with GBW regarding meeting with counsel; communication with counsel	5/5/2022	0.3	225.00	67.50	Financial - Business Analysis
Milana Barkhanoy	Auditing MBT 3331 statement digitalization totals	5/5/2022	0.3	225.00	67.50	Financial - Data Analysis
Geoff Winkler	Emails with MJ re status	5/5/2022	0.1	315.00	31.50	Legal - Case Administration
Geoff Winkler	Chats with MBB regarding meeting with counsel	5/5/2022	0.1	315.00	31.50	Legal - Case Administration
Milana Barkhanoy	Emails with counsel regarding third-party litigations	5/5/2022	0.2	225.00	45.00	Legal - Case Administration
Milana Barkhanoy	Emails with JBH regarding third-party litigations	5/5/2022	0.2	225.00	45.00	Legal - Case Administration
Geoff Winkler	Review accounting update	5/6/2022	0.2	315.00	63.00	Financial - Accounting/Auditing
Ysabel Willits	Reviewing bank statement transactions to integrate into accounting file	5/6/2022	0.7	150.00	105.00	Financial - Accounting/Auditing
Ysabel Willits	Call with MBB regarding integrating transactions into accounting file	5/6/2022	0.5	150.00	75.00	Financial - Accounting/Auditing
Ysabel Willits	Call with MBB regarding editing excel spreadsheets for forensic accounting	5/6/2022	0.2	150.00	30.00	Financial - Accounting/Auditing
Milana Barkhanoy	Auditing MBT 3331 statement digitalization totals; communication with YKW regarding	5/6/2022	2.2	225.00	495.00	Financial - Data Analysis
Milana Barkhanoy	Preparing pdf files for missing MBT statements to run through ScanWriter; communicate	5/6/2022	0.6	225.00	135.00	Financial - Data Analysis
Milana Barkhanoy	Emails from YKW regarding next steps for transaction categorization for MBT	5/6/2022	0.2	225.00	45.00	Financial - Data Analysis
Milana Barkhanoy	Chat with YKW regarding identifying check numbers for transaction in accounting file	5/6/2022	0.1	225.00	22.50	Financial - Data Analysis
Milana Barkhanoy	Call with YKW reviewing MBT digitalized bank transactions and determining next steps	5/6/2022	0.2	225.00	45.00	Financial - Litigation Consulting
Milana Barkhanoy	Call with YKW reviewing transactions added into the accounting file	5/6/2022	0.5	225.00	112.50	Financial - Litigation Consulting
Milana Barkhanoy	Call with YKW reviewing check transactions from scanned document	5/6/2022	0.2	225.00	45.00	Financial - Litigation Consulting
Milana Barkhanoy	Call with YKW discussing missing bank statements and determining next steps	5/6/2022	0.2	225.00	45.00	Financial - Litigation Consulting
Milana Barkhanoy	Call with YKW reviewing results of bank statement digitalization and categorizing transactions	5/6/2022	1.1	225.00	247.50	Financial - Litigation Consulting
Ysabel Willits	Call with MBB reviewing check transactions from bank statements	5/6/2022	0.2	150.00	30.00	Financial - Litigation Consulting
John Hall	Review analysis from UGI and update asset current value.	5/6/2022	0.3	279.00	83.70	Legal - Asset Analysis and Recovery
Milana Barkhanoy	Adding missing detail and data into digitalized transactions in the accounting file; correct	5/6/2022	1.7	225.00	382.50	Legal - Asset Analysis and Recovery
Ysabel Willits	Editing and reviewing transactions to integrate into accounting file	5/6/2022	7.0	150.00	1,050.00	Legal - Asset Analysis and Recovery
Geoff Winkler	Call and text with MBB regarding EIN	5/6/2022	0.2	315.00	63.00	Legal - Case Administration
Ysabel Willits	Call with MBB reviewing MBT digitalized bank transactions and determining next steps	5/6/2022	0.2	150.00	30.00	Legal - Case Administration
Ysabel Willits	Sending memo to GBW and JBH regarding bank statement integration	5/6/2022	0.2	150.00	30.00	Legal - Case Administration
Geoff Winkler	Reconcile bank accounts	5/9/2022	0.2	315.00	63.00	Financial - Accounting/Auditing
Ysabel Willits	Editing and reviewing transaction categorization to integrate into accounting file	5/9/2022	4.0	150.00	600.00	Financial - Litigation Consulting

SEC v. Essex Capital Corporation
Summary of Fees of Receiver and Retained Personnel
April 1, 2022 - June 30, 2022
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Attachment 1

<u>Personnel</u>	<u>Item / Description</u>	<u>Date</u>	<u>Hours</u>	<u>Rate</u>	<u>Amount</u>	<u>Activity Category</u>
Milana Barkhanoy	Email communication to JBH regarding asset task	5/9/2022	0.1	225.00	22.50	Legal - Asset Analysis and Recovery
Milana Barkhanoy	Email communication from JBH regarding asset task	5/9/2022	0.1	225.00	22.50	Legal - Asset Analysis and Recovery
Milana Barkhanoy	Email communication to AMD regarding new asset task	5/9/2022	0.1	225.00	22.50	Legal - Asset Analysis and Recovery
Amanda Deering	Team meeting with GBW, JBH, JPM, YKW, MBB discussing current and future tasks	5/9/2022	0.2	225.00	45.00	Legal - Case Administration
Amanda Deering	Call with MBB reviewing and discussing case history and aligning tasks	5/9/2022	0.7	225.00	157.50	Legal - Case Administration
Amanda Deering	Call with MBB reviewing and discussing claims status and claimant communication s	5/9/2022	0.7	225.00	157.50	Legal - Case Administration
Amanda Deering	Communicating new claimant communication tasks with MBB	5/9/2022	0.1	225.00	22.50	Legal - Case Administration
Geoff Winkler	Reviewing details and finalizing Q1 invoice with MBB	5/9/2022	0.2	315.00	63.00	Legal - Case Administration
Geoff Winkler	Team call to discuss outstanding tasks	5/9/2022	0.2	315.00	63.00	Legal - Case Administration
Geoff Winkler	Call with claimant	5/9/2022	0.3	315.00	94.50	Legal - Case Administration
John Hall	Team meeting with GBW, JBH, JPM, YKW, MBB discussing current and future tasks	5/9/2022	0.2	279.00	55.80	Legal - Case Administration
Josh McGraw	Team meeting with GBW, MBB, AMD and YKW discussing current and future tasks	5/9/2022	0.2	225.00	45.00	Legal - Case Administration
Josh McGraw	Meeting with YKW regarding forensic accounting for personal bank account	5/9/2022	0.1	225.00	22.50	Legal - Case Administration
Milana Barkhanoy	Reviewing details and finalizing Q1 invoice with GBW	5/9/2022	0.2	225.00	45.00	Legal - Case Administration
Milana Barkhanoy	Team meeting with GBW, JBH, JPM, YKW, AMD discussing current and future tasks	5/9/2022	0.2	225.00	45.00	Legal - Case Administration
Milana Barkhanoy	Call with AMD reviewing and discussing case history and aligning tasks	5/9/2022	0.7	225.00	157.50	Legal - Case Administration
Milana Barkhanoy	Call with AMD reviewing and discussing claims status and claimant communication s	5/9/2022	0.7	225.00	157.50	Legal - Case Administration
Milana Barkhanoy	Communicating new claimant communication tasks to AMD; forwarding emails from c	5/9/2022	0.3	225.00	67.50	Legal - Case Administration
Milana Barkhanoy	Forwarding emails from claimants to AMD for follow up	5/9/2022	0.2	225.00	45.00	Legal - Case Administration
Ysabel Willits	Team meeting with JPM, GBW, AMD, and MBB regarding upcoming and ongoing tas	5/9/2022	0.2	150.00	30.00	Legal - Case Administration
Ysabel Willits	Email correspondence with JBH regarding updating forensic accounting project	5/9/2022	0.2	150.00	30.00	Legal - Case Administration
Ysabel Willits	Writing up process for forensic accounting project to follow steps	5/9/2022	0.7	150.00	105.00	Legal - Case Administration
Ysabel Willits	Meeting with JPM regarding forensic accounting for personal bank account	5/9/2022	0.1	150.00	15.00	Legal - Case Administration
Ysabel Willits	Editing and reviewing transaction categorization to integrate into accounting file	5/10/2022	7.9	150.00	1,185.00	Financial - Litigation Consulting
Amanda Deering	Email communication with a potential buyer of an asset.	5/10/2022	0.1	225.00	22.50	Legal - Asset Analysis and Recovery
Amanda Deering	Email communication with a potential buyer of an asset.	5/10/2022	0.1	225.00	22.50	Legal - Asset Analysis and Recovery
Geoff Winkler	Review details from PE to determine liquidity and value	5/10/2022	0.3	315.00	94.50	Legal - Asset Analysis and Recovery
Geoff Winkler	Emails with MBB re asset	5/10/2022	0.2	315.00	63.00	Legal - Asset Analysis and Recovery
Milana Barkhanoy	Emails with GBW re asset; analyzing asset details; email to PTM	5/10/2022	0.4	225.00	90.00	Legal - Asset Analysis and Recovery
Amanda Deering	Reviewing communications from investor for next steps	5/10/2022	0.1	225.00	22.50	Legal - Business Operations
Amanda Deering	Email communications re: next steps.	5/10/2022	0.1	225.00	22.50	Legal - Business Operations
Amanda Deering	Email communication with investor re: next steps	5/10/2022	0.1	225.00	22.50	Legal - Business Operations
Amanda Deering	Reviewing communications for selling assets to understand next steps	5/10/2022	0.2	225.00	45.00	Legal - Business Operations
Amanda Deering	Communications alignment with responses to investor questions	5/10/2022	0.3	225.00	67.50	Legal - Case Administration
Amanda Deering	Response to Investor- email	5/10/2022	0.1	225.00	22.50	Legal - Case Administration
Amanda Deering	Email communication with investor	5/10/2022	0.1	225.00	22.50	Legal - Case Administration
Geoff Winkler	Email with claimant	5/10/2022	0.1	315.00	31.50	Legal - Case Administration
Geoff Winkler	Review wire proceeds, apply to asset	5/10/2022	0.1	315.00	31.50	Legal - Case Administration
Milana Barkhanoy	Call with YKW re transactions recently added to the accounting file	5/11/2022	0.2	225.00	45.00	Financial - Data Analysis
Ysabel Willits	Editing and reviewing transaction categorization to integrate into accounting file	5/11/2022	6.7	150.00	1,005.00	Financial - Litigation Consulting
Milana Barkhanoy	Chat between JBH and MBB re TIN and IRS	5/11/2022	0.1	225.00	22.50	Financial - Tax Issues
Amanda Deering	Email about selling asset	5/11/2022	0.1	225.00	22.50	Legal - Asset Analysis and Recovery
Amanda Deering	Email communication to collect more information for sale of assets	5/11/2022	0.1	225.00	22.50	Legal - Asset Analysis and Recovery
Amanda Deering	Emails with MBB regarding strategy to sell an asset	5/11/2022	0.2	225.00	45.00	Legal - Asset Analysis and Recovery
Milana Barkhanoy	Searching for and analyzing documents for a new asset	5/11/2022	0.8	225.00	180.00	Legal - Asset Analysis and Recovery
Milana Barkhanoy	Emails with AMD regarding strategy to sell an asset	5/11/2022	0.2	225.00	45.00	Legal - Asset Analysis and Recovery
Milana Barkhanoy	Searching for documents for third-party litigation in internal folders and emailing them	5/11/2022	1.0	225.00	225.00	Legal - Asset Analysis and Recovery

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April 1, 2022 - June 30, 2022
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Amanda Deering	Email information regarding assets to potential buyer	5/11/2022	0.1	225.00	22.50	Legal - Business Operations
Amanda Deering	Reviewing and collecting information on CN assets for purchase	5/11/2022	0.4	225.00	90.00	Legal - Business Operations
Amanda Deering	Reviewing documentation and collecting information for potential sale of assets	5/11/2022	0.5	225.00	112.50	Legal - Business Operations
Geoff Winkler	Review records for information on PE, other investments	5/11/2022	1.2	315.00	378.00	Legal - Case Administration
Milana Barkhanoy	Searching for documentation for third-party litigation (request from counsel)	5/11/2022	1.3	225.00	292.50	Legal - Case Administration
Milana Barkhanoy	Emails with counsel re documents needed for third-party litigation;	5/11/2022	0.3	225.00	67.50	Legal - Case Administration
Milana Barkhanoy	Reconciling documents needed for third-party litigation at counsel's request	5/11/2022	1.4	225.00	315.00	Legal - Case Administration
Milana Barkhanoy	Emails with counsel to discuss document needs and schedule	5/11/2022	0.1	225.00	22.50	Legal - Case Administration
Milana Barkhanoy	Emails with counsel to re next steps in third-party litigations	5/11/2022	0.2	225.00	45.00	Legal - Case Administration
Milana Barkhanoy	Call with M.P. to re documents for disgorgement action	5/11/2022	0.3	225.00	67.50	Legal - Case Administration
Milana Barkhanoy	Email communication from JBH regarding claim	5/11/2022	0.1	225.00	22.50	Legal - Case Administration
Milana Barkhanoy	Analyzing claim history and details and gathering information for claimant	5/11/2022	0.5	225.00	112.50	Legal - Case Administration
Milana Barkhanoy	Email communication from a claimant	5/11/2022	0.1	225.00	22.50	Legal - Case Administration
Milana Barkhanoy	Email communication to a claimant	5/11/2022	0.1	225.00	22.50	Legal - Case Administration
Ysabel Willits	Call with MBB regarding the process of categorizing transactions	5/11/2022	0.2	150.00	30.00	Legal - Case Administration
Ysabel Willits	Quick check in with MBB regarding accounting file	5/11/2022	0.1	150.00	15.00	Legal - Case Administration
Geoff Winkler	Review and reconcile settlement payment plans, emails with counsel	5/12/2022	0.3	315.00	94.50	Financial - Accounting/Auditing
Geoff Winkler	Review and process wire transfer of settlement funds	5/12/2022	0.2	315.00	63.00	Financial - Accounting/Auditing
Ysabel Willits	Editing and reviewing transaction categorization to integrate into accounting file	5/12/2022	8.0	150.00	1,200.00	Financial - Accounting/Auditing
Milana Barkhanoy	Communication between YKW and MBB regarding transactions for MBT 3331	5/12/2022	0.2	225.00	45.00	Financial - Litigation Consulting
Amanda Deering	Communication between AMD and MBB regarding current and future task	5/12/2022	0.2	225.00	45.00	Legal - Case Administration
Geoff Winkler	Review request from third party, review records, discuss with JBH, email with counsel	5/12/2022	0.4	315.00	126.00	Legal - Case Administration
Geoff Winkler	Call with MBB to discuss claims question, review claim	5/12/2022	0.2	315.00	63.00	Legal - Case Administration
Geoff Winkler	Emails with counsel re settlement payment	5/12/2022	0.1	315.00	31.50	Legal - Case Administration
Geoff Winkler	Team call to discuss outstanding litigation	5/12/2022	0.5	315.00	157.50	Legal - Case Administration
Geoff Winkler	Chat between GBW and MBB re claimant communication	5/12/2022	0.1	315.00	31.50	Legal - Case Administration
Geoff Winkler	Call between GBW and MBB re claimant communication	5/12/2022	0.1	315.00	31.50	Legal - Case Administration
Milana Barkhanoy	Emails with M.P. re third-party litigations	5/12/2022	0.2	225.00	45.00	Legal - Case Administration
Milana Barkhanoy	Communication between AMD and MBB regarding current and future task	5/12/2022	0.2	225.00	45.00	Legal - Case Administration
Milana Barkhanoy	Call with claimant; gathering info for follow up	5/12/2022	0.7	225.00	157.50	Legal - Case Administration
Milana Barkhanoy	Call between GBW and MBB re claimant communication	5/12/2022	0.1	225.00	22.50	Legal - Case Administration
Milana Barkhanoy	Chat between GBW and MBB re claimant communication	5/12/2022	0.1	225.00	22.50	Legal - Case Administration
Milana Barkhanoy	Call with counsel to discuss litigation, next steps, planning	5/12/2022	0.5	225.00	112.50	Legal - Case Administration
Ysabel Willits	Communication between YKW and MBB regarding transactions for MBT 3331	5/12/2022	0.2	150.00	30.00	Legal - Case Administration
Ysabel Willits	YKW forwarding information to AMD for asset recovery	5/12/2022	0.2	150.00	30.00	Legal - Case Administration
Geoff Winkler	Review accounting update, emails	5/13/2022	0.2	315.00	63.00	Financial - Accounting/Auditing
Milana Barkhanoy	Call with YKW reviewing accounting categorization and discussing next steps	5/13/2022	0.2	225.00	45.00	Financial - Litigation Consulting
Ysabel Willits	Editing and reviewing transaction categorization to integrate into accounting file	5/13/2022	4.0	150.00	600.00	Financial - Litigation Consulting
Geoff Winkler	Discussion between GBW, JBH, MBB re EIN application service and next steps	5/13/2022	0.2	315.00	63.00	Financial - Tax Issues
John Hall	Chats between GBW, JBH, MBB re EIN application service and next steps	5/13/2022	0.2	279.00	55.80	Financial - Tax Issues
Milana Barkhanoy	Multiple calls with EIN application service	5/13/2022	0.8	225.00	180.00	Financial - Tax Issues
Milana Barkhanoy	Chats between GBW, JBH, MBB re EIN application service and next steps	5/13/2022	0.2	225.00	45.00	Financial - Tax Issues
Milana Barkhanoy	Chats with YKW discussing project status and next steps for MBT 3331	5/13/2022	0.2	225.00	45.00	Legal - Asset Analysis and Recovery
Geoff Winkler	Call to discuss value of asset, sale possibilities	5/13/2022	0.4	315.00	126.00	Legal - Asset Disposition
Geoff Winkler	Review email request from counsel, review file, emails with counsel	5/13/2022	0.3	315.00	94.50	Legal - Case Administration
Geoff Winkler	Emails from third party re tax statement, email with counsel, email with third party	5/13/2022	0.2	315.00	63.00	Legal - Case Administration
Ysabel Willits	Communication between YKW and MBB regarding transactions for MBT 3331	5/13/2022	0.2	150.00	30.00	Legal - Case Administration

SEC v. Essex Capital Corporation
Summary of Fees of Receiver and Retained Personnel
April 1, 2022 - June 30, 2022
(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>
John Hall	Review and discuss tax id issues with JC.	5/16/2022	0.4	279.00	111.60	Financial - Tax Issues
John Hall	Review third party issues from counsel and reply with needed items.	5/16/2022	0.3	279.00	83.70	Legal - Asset Analysis and Recovery
Milana Barkhanoy	Analyzing documents and history for asset recovery ; call to A.K	5/16/2022	1.6	225.00	360.00	Legal - Asset Analysis and Recovery
Milana Barkhanoy	Searching for, analyzing and reconciling documents for asset recovery	5/16/2022	1.3	225.00	292.50	Legal - Asset Analysis and Recovery
Milana Barkhanoy	Call with A.K	5/16/2022	0.6	225.00	135.00	Legal - Asset Analysis and Recovery
Milana Barkhanoy	Compiling needed information for asset recovery; email to A.K	5/16/2022	0.4	225.00	90.00	Legal - Asset Analysis and Recovery
Amanda Deering	Call between AMD and MBB discussing current and future tasks	5/16/2022	0.4	225.00	90.00	Legal - Case Administration
Amanda Deering	Meeting between AMD, JBH, MBB discussing current and future tasks	5/16/2022	0.3	225.00	67.50	Legal - Case Administration
Amanda Deering	Communication between AMD, JPM, MBB discussing documents in storage and org;	5/16/2022	0.3	225.00	67.50	Legal - Case Administration
Amanda Deering	Communication from JBH re documents in storage	5/16/2022	0.1	225.00	22.50	Legal - Case Administration
Amanda Deering	Communication between AMD and JBH discussing documents in storage and organi	5/16/2022	0.2	225.00	45.00	Legal - Case Administration
Geoff Winkler	Emails with counsel re settlement conference scheduling	5/16/2022	0.1	315.00	31.50	Legal - Case Administration
Geoff Winkler	Emails with counsel re settlement proceeds, review records and respond	5/16/2022	0.2	315.00	63.00	Legal - Case Administration
John Hall	Communication to JPM re documents in storage	5/16/2022	0.1	279.00	27.90	Legal - Case Administration
John Hall	Team meeting to discuss ongoing tasks.	5/16/2022	0.3	279.00	83.70	Legal - Case Administration
John Hall	Communication between AMD and JBH discussing documents in storage and organi	5/16/2022	0.1	279.00	27.90	Legal - Case Administration
Josh McGraw	Communication between AMD, JPM, MBB discussing documents in storage and org;	5/16/2022	0.3	225.00	67.50	Legal - Case Administration
Josh McGraw	Call between AMD, JPM, MBB discussing and making plans for documents move	5/16/2022	0.2	225.00	45.00	Legal - Case Administration
Josh McGraw	Communication from JBH re documents in storage	5/16/2022	0.1	225.00	22.50	Legal - Case Administration
Josh McGraw	Analysis of cost for document move and creating a plan	5/16/2022	0.6	225.00	135.00	Legal - Case Administration
Josh McGraw	Team meeting with JBH, MBB, AMD discussing current and future tasks	5/16/2022	0.3	225.00	67.50	Legal - Case Administration
Josh McGraw	Booking transportation for documentation move	5/16/2022	0.4	225.00	90.00	Legal - Case Administration
Milana Barkhanoy	Call between AMD and MBB discussing current and future tasks	5/16/2022	0.4	225.00	90.00	Legal - Case Administration
Milana Barkhanoy	Meeting between AMD, JBH, MBB discussing current and future tasks	5/16/2022	0.4	225.00	90.00	Legal - Case Administration
Milana Barkhanoy	Communication between AMD, JPM, MBB discussing documents in storage and org;	5/16/2022	0.3	225.00	67.50	Legal - Case Administration
Milana Barkhanoy	Communication from JBH re documents in storage	5/16/2022	0.1	225.00	22.50	Legal - Case Administration
Milana Barkhanoy	Call between AMD, JPM, MBB discussing and making plans for documents move	5/16/2022	0.2	225.00	45.00	Legal - Case Administration
Milana Barkhanoy	Chat with JBH regarding documents for third-party litigation	5/16/2022	0.1	225.00	22.50	Legal - Case Administration
Milana Barkhanoy	Call with JBH regarding documents for third-party litigation	5/16/2022	0.2	225.00	45.00	Legal - Case Administration
Milana Barkhanoy	Team meeting with JBH, JPM, AMD discussing current and future tasks	5/16/2022	0.3	225.00	67.50	Legal - Case Administration
John Hall	Review TM issues from counsel, review with MBB.	5/17/2022	0.5	279.00	139.50	Financial - Litigation Consulting
Amanda Deering	Prep for call re: CN asset sale	5/17/2022	0.5	225.00	112.50	Legal - Asset Analysis and Recovery
Amanda Deering	Call regarding sell of CN assets details and next steps with financial advisor	5/17/2022	0.3	225.00	67.50	Legal - Asset Analysis and Recovery
Amanda Deering	Call to look into valuation, account and further steps for selling asset	5/17/2022	0.3	225.00	67.50	Legal - Asset Analysis and Recovery
Amanda Deering	Email communication to reach out to gather more information and valuation to aid in :	5/17/2022	0.2	225.00	45.00	Legal - Asset Analysis and Recovery
John Hall	Review request from MP. Review case file on CEH and CEL, review associated leas	5/17/2022	2.7	279.00	753.30	Legal - Asset Analysis and Recovery
John Hall	Review and respond to payout request from counsel.	5/17/2022	0.2	279.00	55.80	Legal - Case Administration
Milana Barkhanoy	Communication with counsel and JBH regarding new third-party litigation, discussing	5/17/2022	0.3	225.00	67.50	Legal - Case Administration
Milana Barkhanoy	Updating clamant address	5/17/2022	0.1	225.00	22.50	Legal - Case Administration
Milana Barkhanoy	Searching for and compiling requested information for claimant; email communicatior	5/17/2022	0.6	225.00	135.00	Legal - Case Administration
Milana Barkhanoy	Analyzing claim distribution scenarios	5/17/2022	1.1	225.00	247.50	Legal - Case Administration
Milana Barkhanoy	Email from counsel (MP) regarding documents for third-party litigation	5/17/2022	0.1	225.00	22.50	Legal - Case Administration
Amanda Deering	Email re: selling assets	5/18/2022	0.1	225.00	22.50	Legal - Asset Analysis and Recovery
Amanda Deering	Communication between AMD and MBB regarding signing documents for asset reco	5/18/2022	0.1	225.00	22.50	Legal - Asset Analysis and Recovery
Milana Barkhanoy	Communication between AMD and MBB regarding signing documents for asset reco	5/18/2022	0.1	225.00	22.50	Legal - Asset Analysis and Recovery
Amanda Deering	Relocating boxes with files into a new storage	5/18/2022	5.0	225.00	1,125.00	Legal - Case Administration
Geoff Winkler	Discussion with counsel re extension of settlement conference, timing	5/18/2022	0.2	315.00	63.00	Legal - Case Administration

SEC v. Essex Capital Corporation
Summary of Fees of Receiver and Retained Personnel
April 1, 2022 - June 30, 2022
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Attachment 1

<u>Personnel</u>	<u>Item / Description</u>	<u>Date</u>	<u>Hours</u>	<u>Rate</u>	<u>Amount</u>	<u>Activity Category</u>
Geoff Winkler	Email from counsel re settlement payments, review and respond	5/18/2022	0.2	315.00	63.00	Legal - Case Administration
Geoff Winkler	Review and process wire transfer, email to counsel	5/18/2022	0.2	315.00	63.00	Legal - Case Administration
John Hall	Work with JPM, AMD, MBB to move all Essex files from Salem to Portland. File review	5/18/2022	5.0	279.00	1,395.00	Legal - Case Administration
John Hall	Review TM file and cross check against accounting and docs received from counsel.	5/18/2022	0.5	279.00	139.50	Legal - Case Administration
Josh McGraw	Work with JPM, AMD, MBB to move all Essex files from Salem to Portland. File review	5/18/2022	5.0	225.00	1,125.00	Legal - Case Administration
Milana Barkhanoy	Email to counsel (MP) regarding documents for third-party litigation	5/18/2022	0.1	225.00	22.50	Legal - Case Administration
Milana Barkhanoy	Relocating boxes with files into a new storage; organizing documents	5/18/2022	5.0	225.00	1,125.00	Legal - Case Administration
Milana Barkhanoy	Emails from JBH regarding new task on third-party litigation, analyzing documents and	5/18/2022	0.7	225.00	157.50	Legal - Case Administration
Milana Barkhanoy	Email from claimant's attorney	5/18/2022	0.1	225.00	22.50	Legal - Case Administration
Milana Barkhanoy	Discussing new task details with JBH	5/18/2022	0.6	225.00	135.00	Legal - Case Administration
Milana Barkhanoy	Analyzing transactions for third-party litigations	5/18/2022	2.7	225.00	607.50	Legal - Case Administration
Milana Barkhanoy	Reviewing third-party litigation update from counsel, updating tracker	5/18/2022	0.2	225.00	45.00	Legal - Case Administration
John Hall	Cash tracing FRB 1270, FRB 8565, GS 8085, for CEL, CEH, TM matter. Also tracing	5/19/2022	4.5	279.00	1,255.50	Financial - Litigation Consulting
Geoff Winkler	Review asset distribution notice, update, capital call	5/19/2022	0.2	315.00	63.00	Legal - Asset Analysis and Recovery
John Hall	Discuss CN asset with AMD.	5/19/2022	0.2	279.00	55.80	Legal - Asset Analysis and Recovery
Geoff Winkler	Emails with counsel re mediation	5/19/2022	0.1	315.00	31.50	Legal - Case Administration
John Hall	Team meeting with MF, JDC, MBB, GBW	5/19/2022	0.5	279.00	139.50	Legal - Case Administration
Milana Barkhanoy	Analyzing transactions and documents for third-party litigations	5/19/2022	1.9	225.00	427.50	Legal - Case Administration
Milana Barkhanoy	Call with counsel to discuss litigation, next steps, planning	5/19/2022	0.6	225.00	135.00	Legal - Case Administration
Geoff Winkler	Review and update receivership accounting and report	5/20/2022	0.4	315.00	126.00	Financial - Accounting/Auditing
John Hall	Accounting for CEL transactions, work with MBB to create schedule, memo to counsel	5/20/2022	3.5	279.00	976.50	Financial - Litigation Consulting
Amanda Deering	Email communication	5/20/2022	0.1	225.00	22.50	Legal - Asset Analysis and Recovery
Amanda Deering	Email communication	5/20/2022	0.1	225.00	22.50	Legal - Asset Analysis and Recovery
John Hall	Asset review and forensic analysis with MBB on CEL	5/20/2022	1.9	279.00	530.10	Legal - Asset Analysis and Recovery
Milana Barkhanoy	Asset review and forensic analysis with JBH on CEL	5/20/2022	1.9	225.00	427.50	Legal - Asset Analysis and Recovery
Milana Barkhanoy	Forensic analysis for third-party litigation	5/20/2022	2.5	225.00	562.50	Legal - Asset Analysis and Recovery
Milana Barkhanoy	Call with JBH reviewing transactions and conducting forensic analysis of CEL	5/20/2022	0.6	225.00	135.00	Legal - Asset Analysis and Recovery
Milana Barkhanoy	Chats with JBH reviewing transactions and conducting forensic analysis of CEL	5/20/2022	0.2	225.00	45.00	Legal - Asset Analysis and Recovery
Milana Barkhanoy	Conducting forensic analysis of CEL	5/20/2022	1.5	225.00	337.50	Legal - Asset Analysis and Recovery
Milana Barkhanoy	Multiple emails with JBH re forensic analysis of CEL	5/20/2022	0.2	225.00	45.00	Legal - Asset Analysis and Recovery
Milana Barkhanoy	Summarizing findings into report for counsel for third-party litigation; email to JBH	5/20/2022	1.1	225.00	247.50	Legal - Asset Analysis and Recovery
Geoff Winkler	Discussion of mediation and timing	5/20/2022	0.2	315.00	63.00	Legal - Case Administration
Geoff Winkler	Review updated schedule for upcoming mediation	5/20/2022	0.2	315.00	63.00	Legal - Case Administration
Amanda Deering	Email communication re: sale of assets next steps	5/23/2022	0.2	225.00	45.00	Legal - Asset Analysis and Recovery
Amanda Deering	Meeting to review asset recovery next steps with MBB	5/23/2022	0.2	225.00	45.00	Legal - Asset Analysis and Recovery
Amanda Deering	Call regarding assets	5/23/2022	0.2	225.00	45.00	Legal - Asset Analysis and Recovery
Amanda Deering	Communication re: assets	5/23/2022	0.1	225.00	22.50	Legal - Asset Analysis and Recovery
John Hall	Review warrant documentation	5/23/2022	0.3	279.00	83.70	Legal - Asset Analysis and Recovery
John Hall	Review request from counsel, analysis of asset file and memo back re: same.	5/23/2022	0.5	279.00	139.50	Legal - Asset Analysis and Recovery
Milana Barkhanoy	Meeting to review asset recovery next steps with MBB and AMD	5/23/2022	0.2	225.00	45.00	Legal - Asset Analysis and Recovery
Amanda Deering	Team meeting with GBW, JBH, MBB, JPM and AMD discussing current and future tasks	5/23/2022	0.2	225.00	45.00	Legal - Case Administration
Geoff Winkler	Emails with counsel re scheduling issues	5/23/2022	0.1	315.00	31.50	Legal - Case Administration
Geoff Winkler	Call with claimant	5/23/2022	0.2	315.00	63.00	Legal - Case Administration
Geoff Winkler	Team call to discuss outstanding tasks	5/23/2022	0.2	315.00	63.00	Legal - Case Administration
Geoff Winkler	Review and update SFAR, emails with counsel	5/23/2022	0.2	315.00	63.00	Legal - Case Administration
John Hall	Case meeting discussing outstanding items.	5/23/2022	0.2	279.00	55.80	Legal - Case Administration
Josh McGraw	Team meeting with GBW, JBH, MBB and AMD discussing current and future tasks	5/23/2022	0.2	225.00	45.00	Legal - Case Administration

SEC v. Essex Capital Corporation
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Attachment 1

<u>Personnel</u>	<u>Item / Description</u>	<u>Date</u>	<u>Hours</u>	<u>Rate</u>	<u>Amount</u>	<u>Activity Category</u>
Milana Barkhanoy	Multiple email from counsel; updating notes and records on third-party litigations	5/23/2022	0.3	225.00	67.50	Legal - Case Administration
Milana Barkhanoy	Team meeting to discuss outstanding tasks	5/23/2022	0.2	225.00	45.00	Legal - Case Administration
Milana Barkhanoy	Analyzing scenarios for claim payouts	5/23/2022	1.9	225.00	427.50	Legal - Case Administration
Milana Barkhanoy	Email communication from claimant	5/23/2022	0.1	225.00	22.50	Legal - Case Administration
Milana Barkhanoy	Reviewing third-party litigation update from counsel, updating tracker	5/23/2022	0.2	225.00	45.00	Legal - Case Administration
Amanda Deering	Reviewing and Preparing contract to be signed for asset sale	5/24/2022	0.5	225.00	112.50	Legal - Asset Analysis and Recovery
Amanda Deering	Email regarding asset details for potential sale	5/24/2022	0.1	225.00	22.50	Legal - Asset Analysis and Recovery
Geoff Winkler	Emails with counsel re scheduling settlement conference	5/24/2022	0.1	315.00	31.50	Legal - Case Administration
Geoff Winkler	Call with interested party re status, upcoming activity	5/24/2022	0.4	315.00	126.00	Legal - Case Administration
Geoff Winkler	Review litigation expense, results, discuss strategy	5/24/2022	0.8	315.00	252.00	Legal - Case Administration
Milana Barkhanoy	Analyzing scenarios for claim payouts	5/24/2022	0.6	225.00	135.00	Legal - Case Administration
Amanda Deering	Transporting Assets	5/25/2022	1.5	225.00	337.50	Legal - Asset Analysis and Recovery
Amanda Deering	Communication regarding asset sale	5/25/2022	0.1	225.00	22.50	Legal - Asset Analysis and Recovery
Amanda Deering	Communication re: assets valuation process	5/25/2022	0.1	225.00	22.50	Legal - Asset Analysis and Recovery
Amanda Deering	Communication re: asset sale next steps	5/25/2022	0.1	225.00	22.50	Legal - Asset Analysis and Recovery
Amanda Deering	Email communication re: asset sale	5/25/2022	0.1	225.00	22.50	Legal - Asset Analysis and Recovery
Josh McGraw	Transporting assets	5/25/2022	0.3	225.00	67.50	Legal - Asset Analysis and Recovery
Milana Barkhanoy	Call with claimant's attorney	5/25/2022	0.6	225.00	135.00	Legal - Case Administration
Milana Barkhanoy	Communication from JBH on third-party litigation	5/25/2022	0.1	225.00	22.50	Legal - Case Administration
Milana Barkhanoy	Email to JBH re documents for counsel	5/25/2022	0.1	225.00	22.50	Legal - Case Administration
Milana Barkhanoy	Emails with claimant's attorney	5/25/2022	0.2	225.00	45.00	Legal - Case Administration
John Hall	Review TIN issues and discuss entity name convention options with IRS agent.	5/26/2022	1.0	279.00	279.00	Financial - Tax Issues
Amanda Deering	Call with art dealer about art sale process	5/26/2022	0.2	225.00	45.00	Legal - Asset Analysis and Recovery
Amanda Deering	Preparing for Asset Listing	5/26/2022	0.3	225.00	67.50	Legal - Asset Analysis and Recovery
John Hall	Discuss case issues with MP (.7) create breakdown of RE schedule (1.7) ~1,060 trar	5/26/2022	2.4	279.00	669.60	Legal - Asset Analysis and Recovery
John Hall	Review settlement agreement and discuss with GBW.	5/26/2022	0.8	279.00	223.20	Legal - Case Administration
Milana Barkhanoy	Multiple emails with counsel re meeting and case legal updates	5/26/2022	0.2	225.00	45.00	Legal - Case Administration
Milana Barkhanoy	Analyzing claim payout scenarios	5/26/2022	1.1	225.00	247.50	Legal - Case Administration
Milana Barkhanoy	Reviewing data and transactions for ongoing settlement for counsel	5/26/2022	1.1	225.00	247.50	Legal - Case Administration
Amanda Deering	Email communication regarding asset sale next steps	5/27/2022	0.1	225.00	22.50	Legal - Asset Analysis and Recovery
Amanda Deering	Email communication re: sale of assets	5/27/2022	0.1	225.00	22.50	Legal - Asset Analysis and Recovery
Geoff Winkler	Call with third party re PE sales	5/27/2022	0.3	315.00	94.50	Legal - Asset Analysis and Recovery
John Hall	Review and tie out 13 loans and their payment schedules to refute CEH assertion of	5/27/2022	4.0	279.00	1,116.00	Legal - Asset Analysis and Recovery
Geoff Winkler	Call with counsel to discuss litigation	5/27/2022	0.4	315.00	126.00	Legal - Case Administration
Geoff Winkler	Emails with counsel re site visit	5/27/2022	0.1	315.00	31.50	Legal - Case Administration
Milana Barkhanoy	Reviewing data and transactions for third-party recovery at request from counsel	5/27/2022	0.1	225.00	22.50	Legal - Case Administration
Amanda Deering	Call with potential buyer re: asset details	5/30/2022	0.3	225.00	67.50	Legal - Asset Analysis and Recovery
John Hall	Review CVL analysis, discuss with GBW in preparation for on site visit.	5/31/2022	0.9	279.00	251.10	Financial - Accounting/Auditing
John Hall	Review tax ID issues with accountant, discuss with GBW.	5/31/2022	0.5	279.00	139.50	Financial - Tax Issues
Amanda Deering	Prepping for art sale	5/31/2022	0.5	225.00	112.50	Legal - Asset Analysis and Recovery
Amanda Deering	Call with MBB re asset	5/31/2022	0.1	225.00	22.50	Legal - Asset Analysis and Recovery
Amanda Deering	Listing art on art brokerage site and other venues	5/31/2022	0.5	225.00	112.50	Legal - Asset Analysis and Recovery
Milana Barkhanoy	Call with AMD re asset	5/31/2022	0.1	225.00	22.50	Legal - Asset Analysis and Recovery
Amanda Deering	Meeting with MBB, JBH, GBW, SBP and AMD to discuss next steps	5/31/2022	0.1	225.00	22.50	Legal - Case Administration
Geoff Winkler	Team meeting to discuss outstanding tasks	5/31/2022	0.1	315.00	31.50	Legal - Case Administration
Geoff Winkler	Emails with counsel re CVL	5/31/2022	0.1	315.00	31.50	Legal - Case Administration
Geoff Winkler	Review distribution plan, tax status, discussion with counsel	5/31/2022	0.6	315.00	189.00	Legal - Case Administration

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Personnel	Item / Description	Date	Hours	Rate	Amount	Activity Category
John Hall	Meeting with MBB, JBH, GBW, SBP and AMD to discuss next steps	5/31/2022	0.1	279.00	27.90	Legal - Case Administration
Josh McGraw	Team meeting discussing current and future tasks	5/31/2022	0.1	225.00	22.50	Legal - Case Administration
Josh McGraw	Call with claimant requesting update	5/31/2022	0.8	225.00	180.00	Legal - Case Administration
Josh McGraw	Messages with MBB regarding claimant communication	5/31/2022	0.2	225.00	45.00	Legal - Case Administration
Josh McGraw	Gathering information for claimant in preparation of call	5/31/2022	0.2	225.00	45.00	Legal - Case Administration
Milana Barkhanoy	Email from JBH re claims payout and next steps	5/31/2022	0.1	225.00	22.50	Legal - Case Administration
Milana Barkhanoy	Email communication from JBH re claimant	5/31/2022	0.1	225.00	22.50	Legal - Case Administration
Milana Barkhanoy	Analyzing claimant case, gathering information and replying to a claimant	5/31/2022	0.3	225.00	67.50	Legal - Case Administration
Milana Barkhanoy	Email communication to JBH re claimant	5/31/2022	0.1	225.00	22.50	Legal - Case Administration
Milana Barkhanoy	Team meeting to discuss outstanding tasks	5/31/2022	0.1	225.00	22.50	Legal - Case Administration
Milana Barkhanoy	Analyzing and compiling claim payout scenarios	5/31/2022	1.8	225.00	405.00	Legal - Case Administration
Milana Barkhanoy	Auditing claim payout scenarios	5/31/2022	0.5	225.00	112.50	Legal - Case Administration
Milana Barkhanoy	Summarizing claim payout scenarios; drafting overview; communication to JBH	5/31/2022	1.1	225.00	247.50	Legal - Case Administration
Milana Barkhanoy	Communication with JBH re next steps in claim payouts	5/31/2022	0.2	225.00	45.00	Legal - Case Administration
Milana Barkhanoy	Call with claimant	5/31/2022	0.8	225.00	180.00	Legal - Case Administration
Milana Barkhanoy	Gathering data for claimant; call with JPM to a claimant	5/31/2022	0.5	225.00	112.50	Legal - Case Administration
Milana Barkhanoy	Chats with JPM re claimant requests and communication	5/31/2022	0.2	225.00	45.00	Legal - Case Administration
Sam Parker	Team meeting to discuss outstanding tasks	5/31/2022	0.1	175.00	17.50	Legal - Case Administration
John Hall	Calling and attempting to resolve TIN issue with IRS	6/1/2022	1.4	279.00	390.60	Financial - Tax Issues
Amanda Deering	Following up on communication re: asset details for potential to sell	6/1/2022	0.2	225.00	45.00	Legal - Asset Analysis and Recovery
Amanda Deering	Reaching out to appraiser re: asset and confirming details	6/1/2022	0.3	225.00	67.50	Legal - Asset Analysis and Recovery
John Hall	Communication with JPM regarding counsel requested information	6/1/2022	0.1	279.00	27.90	Legal - Asset Analysis and Recovery
Josh McGraw	Communication with JBH regarding counsel requested information	6/1/2022	0.1	225.00	22.50	Legal - Asset Analysis and Recovery
Josh McGraw	Reviewing accounting for counsel requests related to WN	6/1/2022	1.5	225.00	337.50	Legal - Asset Analysis and Recovery
Josh McGraw	Communication between MBB and JPM regarding counsel requested information and	6/1/2022	0.2	225.00	45.00	Legal - Asset Analysis and Recovery
Milana Barkhanoy	Communication between MBB and JPM regarding counsel requested information and	6/1/2022	0.2	225.00	45.00	Legal - Asset Analysis and Recovery
Geoff Winkler	Emails with counsel re mediation	6/1/2022	0.1	315.00	31.50	Legal - Case Administration
Milana Barkhanoy	Email from JBH re third-party litigation task	6/1/2022	-	225.00	-	Legal - Case Administration
Milana Barkhanoy	Communication with JPM regarding forensic accounting for third-party litigation	6/1/2022	0.2	225.00	45.00	Legal - Case Administration
Milana Barkhanoy	Email from JBH re EIN status	6/2/2022	0.1	225.00	22.50	Financial - Tax Issues
Amanda Deering	Reviewing potential asset selling methods and communication re: next steps	6/2/2022	0.3	225.00	67.50	Legal - Asset Analysis and Recovery
John Hall	Review materials and discuss analysis of recovery options with GBW	6/2/2022	0.6	279.00	167.40	Legal - Asset Analysis and Recovery
Josh McGraw	Communication with JBH regarding WN requested information	6/2/2022	0.2	225.00	45.00	Legal - Asset Analysis and Recovery
Josh McGraw	Reviewing accounting for counsel requests related to WN	6/2/2022	3.0	225.00	675.00	Legal - Asset Analysis and Recovery
Milana Barkhanoy	Discussion with JBH re asset recovery and next steps	6/2/2022	0.3	225.00	67.50	Legal - Asset Analysis and Recovery
Geoff Winkler	Review draft settlements, discussion with counsel re settlement and other outstanding	6/2/2022	0.9	315.00	283.50	Legal - Case Administration
Geoff Winkler	Work with counsel to find agreeable date for meeting, review of CVL, other settlement	6/2/2022	0.3	315.00	94.50	Legal - Case Administration
John Hall	Case meeting with team and counsel.	6/2/2022	0.5	279.00	139.50	Legal - Case Administration
John Hall	Producing materials for MP per his request on WN matter.	6/2/2022	2.5	279.00	697.50	Legal - Case Administration
John Hall	Discussion with SBP and MBB re claims payout and next steps	6/2/2022	0.5	279.00	139.50	Legal - Case Administration
Milana Barkhanoy	Communication with SBP re claim verification in Stretto	6/2/2022	0.2	225.00	45.00	Legal - Case Administration
Milana Barkhanoy	Email to JBH re claims payout and next steps	6/2/2022	0.1	225.00	22.50	Legal - Case Administration
Milana Barkhanoy	Discussion with JBH re claims payout and next steps	6/2/2022	0.5	225.00	112.50	Legal - Case Administration
Milana Barkhanoy	Discussion with JBH and SBP re claims payout and next steps	6/2/2022	0.5	225.00	112.50	Legal - Case Administration
Milana Barkhanoy	Reviewing claim payout scenarios with JBH	6/2/2022	0.4	225.00	90.00	Legal - Case Administration
Milana Barkhanoy	Call with counsel discussing current and future tasks	6/2/2022	0.5	225.00	112.50	Legal - Case Administration
Milana Barkhanoy	Analyzing and updating assets	6/2/2022	0.4	225.00	90.00	Legal - Case Administration

SEC v. Essex Capital Corporation
Summary of Fees of Receiver and Retained Personnel
April 1, 2022 - June 30, 2022
(Sorted in Chronological Order by Activity Category)

Attachment 1

Personnel	Item / Description	Date	Hours	Rate	Amount	Activity Category
Milana Barkhanoy	Email from counsel; reviewing data and transactions for third-party litigations	6/2/2022	0.2	225.00	45.00	Legal - Case Administration
Sam Parker	Discussion with JBH and MBB re claims payout and next steps	6/2/2022	0.5	175.00	87.50	Legal - Case Administration
Sam Parker	Communication with MBB re claim verification in Stretto	6/2/2022	0.2	175.00	35.00	Legal - Case Administration
John Hall	Resolving outstanding tax preparation questions from JC.	6/3/2022	3.4	279.00	948.60	Financial - Tax Issues
Milana Barkhanoy	Email from JBH; reviewing update on tax issues progress from CPA	6/3/2022	0.3	225.00	67.50	Financial - Tax Issues
Milana Barkhanoy	Analyzing documents for asset recovery status update, email to F.W.	6/3/2022	0.3	225.00	67.50	Legal - Asset Analysis and Recovery
Amanda Deering	Team meeting discussing current and future tasks	6/6/2022	0.2	225.00	45.00	Legal - Case Administration
Geoff Winkler	Team meeting to discuss outstanding tasks	6/6/2022	0.2	315.00	63.00	Legal - Case Administration
John Hall	Team meeting to discuss casework	6/6/2022	0.2	279.00	55.80	Legal - Case Administration
Josh McGraw	Team meeting discussing current and future tasks	6/6/2022	0.2	225.00	45.00	Legal - Case Administration
Milana Barkhanoy	Email from counsel; updating third-party litigation tracker	6/6/2022	0.2	225.00	45.00	Legal - Case Administration
Milana Barkhanoy	Team meeting to discuss outstanding tasks	6/6/2022	0.2	225.00	45.00	Legal - Case Administration
Milana Barkhanoy	Communication with JBH re relocated documents and mileage; uploading documents	6/6/2022	0.3	225.00	67.50	Legal - Case Administration
Sam Parker	Team meeting discussing current and future tasks	6/6/2022	0.2	175.00	35.00	Legal - Case Administration
Milana Barkhanoy	Email from JBH re asset status	6/7/2022	0.1	225.00	22.50	Legal - Asset Analysis and Recovery
Milana Barkhanoy	Analyzing asset status and history of recovery	6/7/2022	0.2	225.00	45.00	Legal - Asset Analysis and Recovery
Milana Barkhanoy	Email to JBH re asset recovery and status	6/7/2022	0.1	225.00	22.50	Legal - Asset Analysis and Recovery
Milana Barkhanoy	Updating notes on asset status and progress	6/7/2022	0.1	225.00	22.50	Legal - Asset Analysis and Recovery
John Hall	Review wire info and memo to team re: conclusion of FZ collection effort.	6/8/2022	0.3	279.00	83.70	Legal - Asset Analysis and Recovery
Milana Barkhanoy	Email communication from JBH re asset recovery; updating assets tracker	6/8/2022	0.2	225.00	45.00	Legal - Asset Analysis and Recovery
Geoff Winkler	Emails with counsel re settlement and disgorgement	6/8/2022	0.2	315.00	63.00	Legal - Case Administration
Milana Barkhanoy	Updating tasks list	6/8/2022	0.1	225.00	22.50	Legal - Case Administration
John Hall	Review counsel recommendations, analysis of file, discuss with GBW and memo to I	6/9/2022	1.5	279.00	418.50	Legal - Asset Analysis and Recovery
Milana Barkhanoy	Communication with JBH re third-party litigation	6/9/2022	0.2	225.00	45.00	Legal - Case Administration
Milana Barkhanoy	Analyzing transactions for third-party litigation	6/9/2022	0.3	225.00	67.50	Legal - Case Administration
Milana Barkhanoy	Call with counsel discussing current and future tasks	6/9/2022	0.1	225.00	22.50	Legal - Case Administration
Milana Barkhanoy	Analyzing transactions for third-party litigation for counsel	6/10/2022	1.2	225.00	270.00	Financial - Litigation Consulting
Milana Barkhanoy	Call with JBH discussing lease transactions for third-party litigation	6/10/2022	0.2	225.00	45.00	Financial - Litigation Consulting
John Hall	Review outstanding issues and write memo to JC re tax returns.	6/10/2022	0.4	279.00	111.60	Financial - Tax Issues
John Hall	Review TM issues in preparation for discussion with MP.	6/10/2022	0.6	279.00	167.40	Legal - Asset Analysis and Recovery
Milana Barkhanoy	Communication with JBH re transactions for third-party litigation	6/10/2022	0.2	225.00	45.00	Legal - Case Administration
Milana Barkhanoy	Communication with JBH re claimant payout	6/10/2022	0.2	225.00	45.00	Legal - Case Administration
Milana Barkhanoy	Updating claimant payout schedule and calculation	6/10/2022	0.6	225.00	135.00	Legal - Case Administration
Milana Barkhanoy	Analyzing payout scenarios for claimant communication	6/10/2022	0.3	225.00	67.50	Legal - Case Administration
Milana Barkhanoy	Email to JBH re transactions for third-party litigation	6/10/2022	0.1	225.00	22.50	Legal - Case Administration
Milana Barkhanoy	Communication from JBH re EIN	6/10/2022	0.1	225.00	22.50	Legal - Case Administration
John Hall	Review memo from counsel and respond.	6/11/2022	0.1	279.00	27.90	Legal - Case Administration
John Hall	Working through TM documentation task with MBB for MP.	6/12/2022	2.0	279.00	558.00	Financial - Litigation Consulting
Milana Barkhanoy	Working through TM documentation task with JBH for MP.	6/12/2022	2.0	225.00	450.00	Financial - Litigation Consulting
Josh McGraw	Communication with JBH regarding accounting	6/12/2022	0.2	225.00	45.00	Legal - Case Administration
John Hall	Tax issues discussion and determining next steps with MBB	6/13/2022	0.3	279.00	83.70	Financial - Tax Issues
Milana Barkhanoy	Tax issues discussion and determining next steps with JBH	6/13/2022	0.3	225.00	67.50	Financial - Tax Issues
Milana Barkhanoy	Call to JC re taxes	6/13/2022	0.1	225.00	22.50	Financial - Tax Issues
Milana Barkhanoy	Chat from JBH re tax update	6/13/2022	0.1	225.00	22.50	Financial - Tax Issues
Milana Barkhanoy	Searching for new contact for asset recovery	6/13/2022	0.2	225.00	45.00	Legal - Asset Analysis and Recovery
Milana Barkhanoy	Communication to JE for asset recovery	6/13/2022	0.1	225.00	22.50	Legal - Asset Analysis and Recovery
Milana Barkhanoy	Email communication to JBH re asset recovery; updating assets tracker	6/13/2022	0.2	225.00	45.00	Legal - Asset Analysis and Recovery

SEC v. Essex Capital Corporation
Summary of Fees of Receiver and Retained Personnel
April 1, 2022 - June 30, 2022
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Attachment 1

Personnel	Item / Description	Date	Hours	Rate	Amount	Activity Category
Milana Barkhanoy	Asset list reconciliation and update	6/13/2022	1.5	225.00	337.50	Legal - Asset Analysis and Recovery
Milana Barkhanoy	Reconciling assets in Stretto against asset tracker	6/13/2022	0.8	225.00	180.00	Legal - Asset Analysis and Recovery
Geoff Winkler	Communication with MBB re fees and estate forecasting	6/13/2022	0.1	315.00	31.50	Legal - Case Administration
Geoff Winkler	Email to MBB re legal fees for estate forecasting	6/13/2022	0.1	315.00	31.50	Legal - Case Administration
Geoff Winkler	Emails and discussion with counsel re estimate for distribution	6/13/2022	0.2	315.00	63.00	Legal - Case Administration
John Hall	Communication with MBB re total estate forecast	6/13/2022	0.2	279.00	55.80	Legal - Case Administration
John Hall	Claim review with MBB; discussing next steps in claimant communication	6/13/2022	0.3	279.00	83.70	Legal - Case Administration
Milana Barkhanoy	Communication with GBW re fees and estate forecasting	6/13/2022	0.1	225.00	22.50	Legal - Case Administration
Milana Barkhanoy	Email from GBW re legal fees for estate forecasting	6/13/2022	0.1	225.00	22.50	Legal - Case Administration
Milana Barkhanoy	Call from a claimant	6/13/2022	0.1	225.00	22.50	Legal - Case Administration
Milana Barkhanoy	Call with a claimant	6/13/2022	0.2	225.00	45.00	Legal - Case Administration
Milana Barkhanoy	Reviewing claim detail and gathering information for a call with a claimant	6/13/2022	0.2	225.00	45.00	Legal - Case Administration
Milana Barkhanoy	Communication to JBH re taxes	6/13/2022	0.1	225.00	22.50	Legal - Case Administration
Milana Barkhanoy	Multiple emails with JBH and MP from AM re transactions for third-party litigation	6/13/2022	0.2	225.00	45.00	Legal - Case Administration
Milana Barkhanoy	Compiling list of transactions for third-party litigation; email to MP from AM	6/13/2022	0.3	225.00	67.50	Legal - Case Administration
Milana Barkhanoy	Communication to PT re asset recovery	6/13/2022	0.1	225.00	22.50	Legal - Case Administration
Milana Barkhanoy	Communication with JBH re total estate forecast	6/13/2022	0.2	225.00	45.00	Legal - Case Administration
Milana Barkhanoy	Email communication to MP at AM re third-party litigations	6/13/2022	0.1	225.00	22.50	Legal - Case Administration
Milana Barkhanoy	Claim review with JBH; discussing next steps in claimant communication	6/13/2022	0.3	225.00	67.50	Legal - Case Administration
Milana Barkhanoy	Email from JBH re claim documents	6/13/2022	0.1	225.00	22.50	Legal - Case Administration
John Hall	Review and reconciliation of MBT legal fees assessed, memo to JdC.	6/14/2022	0.9	279.00	251.10	Financial - Accounting/Auditing
John Hall	Review WN request from MP, compile intelligence and results.	6/14/2022	1.4	279.00	390.60	Financial - Accounting/Auditing
John Hall	Review draft settlement and case file, respond to MH re updates.	6/14/2022	0.8	279.00	223.20	Financial - Litigation Consulting
Geoff Winkler	Emails with JD re status	6/14/2022	0.1	315.00	31.50	Financial - Tax Issues
Milana Barkhanoy	Communication from JC re taxes	6/14/2022	0.1	225.00	22.50	Financial - Tax Issues
Milana Barkhanoy	Reconciling Assets list	6/14/2022	0.6	225.00	135.00	Legal - Asset Analysis and Recovery
Milana Barkhanoy	Reviewing assets list with JBH and determining next steps	6/14/2022	0.6	225.00	135.00	Legal - Asset Analysis and Recovery
Milana Barkhanoy	Multiple emails from MP from counsel re transactions for third-party litigations; updati	6/14/2022	0.3	225.00	67.50	Legal - Asset Analysis and Recovery
Geoff Winkler	Team meeting to discuss outstanding tasks	6/14/2022	0.3	315.00	94.50	Legal - Case Administration
John Hall	Review tax issues, outstanding reconciliation items for MP.	6/14/2022	1.2	279.00	334.80	Legal - Case Administration
John Hall	Case meeting with team	6/14/2022	0.3	279.00	83.70	Legal - Case Administration
Josh McGraw	Team meeting discussing current and future tasks	6/14/2022	0.3	225.00	67.50	Legal - Case Administration
Milana Barkhanoy	Developing model to track total Estate forecast	6/14/2022	0.8	225.00	180.00	Legal - Case Administration
Milana Barkhanoy	Team meeting to discuss outstanding tasks	6/14/2022	0.3	225.00	67.50	Legal - Case Administration
Milana Barkhanoy	Communication from JBH re claimant communication	6/14/2022	0.1	225.00	22.50	Legal - Case Administration
Geoff Winkler	Call with accountants to discuss outstanding issues	6/15/2022	0.5	315.00	157.50	Financial - Tax Issues
Milana Barkhanoy	Reconciling asset list; updating records	6/15/2022	2.1	225.00	472.50	Legal - Asset Analysis and Recovery
Milana Barkhanoy	Email to JBH re updated asset list	6/15/2022	0.1	225.00	22.50	Legal - Asset Analysis and Recovery
Milana Barkhanoy	Reviewing and reconciling asset payments history; email to JBH re needed updates	6/15/2022	1.1	225.00	247.50	Legal - Asset Analysis and Recovery
Milana Barkhanoy	Email from JBH re updated asset categories	6/15/2022	0.1	225.00	22.50	Legal - Asset Analysis and Recovery
Milana Barkhanoy	Chat with JBH reviewing assets, payments and discussing next steps	6/15/2022	0.4	225.00	90.00	Legal - Asset Analysis and Recovery
Milana Barkhanoy	Multiple emails from JBH and SP re asset sale	6/15/2022	0.3	225.00	67.50	Legal - Asset Analysis and Recovery
Milana Barkhanoy	Adjusting total case estate calculation forecast with update from counsel	6/15/2022	0.3	225.00	67.50	Legal - Asset Analysis and Recovery
John Hall	Work with MBB on Asset reconciliation	6/15/2022	0.4	279.00	111.60	Legal - Asset Disposition
John Hall	Review and reconciliation of operational asset list with stretto system asset list, upda	6/15/2022	4.3	279.00	1,199.70	Legal - Asset Disposition
Geoff Winkler	Call with counsel to discuss outstanding tasks	6/15/2022	0.5	315.00	157.50	Legal - Case Administration
Milana Barkhanoy	Call with JBH reviewing claim details and calling claimant	6/15/2022	1.0	225.00	225.00	Legal - Case Administration

SEC v. Essex Capital Corporation
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April 1, 2022 - June 30, 2022
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Attachment 1

Personnel	Item / Description	Date	Hours	Rate	Amount	Activity Category
Milana Barkhanoy	Multiple emails with MP from AT re third-party litigations	6/15/2022	0.2	225.00	45.00	Legal - Case Administration
Milana Barkhanoy	Email from JBH re claimant communication	6/15/2022	0.1	225.00	22.50	Legal - Case Administration
Milana Barkhanoy	Email communication to a claimant with case update	6/15/2022	0.1	225.00	22.50	Legal - Case Administration
Milana Barkhanoy	Multiple emails with counsel and JBH re settlements	6/15/2022	0.3	225.00	67.50	Legal - Case Administration
Milana Barkhanoy	Emails with MP from AM re litigations; reviewing list of updates	6/15/2022	0.2	225.00	45.00	Legal - Case Administration
Milana Barkhanoy	Email communication to MP at counsel requesting additional detail for litigations	6/15/2022	0.1	225.00	22.50	Legal - Case Administration
Milana Barkhanoy	Chat with JBH re claim analysis	6/15/2022	0.1	225.00	22.50	Legal - Case Administration
John Hall	Work with MBB (1.0) and review file (.6) to discuss JG concerns.	6/15/2022	1.6	279.00	446.40	Legal - Claims Administration and Objections
Milana Barkhanoy	Discussing next steps in asset analysis with JBH	6/16/2022	0.1	225.00	22.50	Legal - Asset Analysis and Recovery
Milana Barkhanoy	Quick check-in with AMD re status for two assets	6/16/2022	0.1	225.00	22.50	Legal - Asset Analysis and Recovery
Milana Barkhanoy	Chat with JBH re total estate forecast	6/16/2022	0.2	225.00	45.00	Legal - Asset Analysis and Recovery
Milana Barkhanoy	Scrubbing asset records and making needed updates in Stretto	6/16/2022	1.8	225.00	405.00	Legal - Asset Analysis and Recovery
Milana Barkhanoy	Reviewing and discussing estate forecast with JBH, determining next steps	6/16/2022	1.0	225.00	225.00	Legal - Asset Analysis and Recovery
Milana Barkhanoy	Analyzing and compiling total estate forecast	6/16/2022	2.0	225.00	450.00	Legal - Asset Analysis and Recovery
Milana Barkhanoy	Updating assets tracker	6/16/2022	1.2	225.00	270.00	Legal - Asset Analysis and Recovery
Josh McGraw	Review and process mail and email to JBH for next steps	6/16/2022	0.3	225.00	67.50	Legal - Case Administration
Milana Barkhanoy	Multiple emails with MP from counsel re legal settlements	6/16/2022	0.2	225.00	45.00	Legal - Case Administration
Milana Barkhanoy	Emails with counsel re litigation updates	6/16/2022	0.2	225.00	45.00	Legal - Case Administration
Amanda Deering	Chat with MMB re next steps in assets recovery	6/17/2022	0.2	225.00	45.00	Legal - Asset Analysis and Recovery
Milana Barkhanoy	Call with JBH reviewing records and details for potential assets and determining next	6/17/2022	1.8	225.00	405.00	Legal - Asset Analysis and Recovery
Milana Barkhanoy	Chat with JBH determining next steps in assets analysis	6/17/2022	0.1	225.00	22.50	Legal - Asset Analysis and Recovery
Milana Barkhanoy	Chat with AMD re next steps in assets recovery	6/17/2022	0.2	225.00	45.00	Legal - Asset Analysis and Recovery
Milana Barkhanoy	Analyzing and compiling total estate forecast	6/17/2022	0.8	225.00	180.00	Legal - Asset Analysis and Recovery
John Hall	research (.2) and work with MBB on final assets searches (1.8)	6/17/2022	2.0	279.00	558.00	Legal - Asset Disposition
Amanda Deering	Communication with gallery regarding selling art	6/20/2022	0.3	225.00	67.50	Legal - Asset Analysis and Recovery
Amanda Deering	Putting art on consignment	6/20/2022	0.8	225.00	180.00	Legal - Asset Analysis and Recovery
Amanda Deering	Team meeting discussing current and future tasks	6/20/2022	0.1	225.00	22.50	Legal - Case Administration
Amanda Deering	Discussing case update and next steps with AMD, MBB	6/20/2022	0.2	225.00	45.00	Legal - Case Administration
Amanda Deering	Communication with investor re: timeline for claim distribution	6/20/2022	0.2	225.00	45.00	Legal - Case Administration
Geoff Winkler	Team meeting to discuss outstanding tasks	6/20/2022	0.1	315.00	31.50	Legal - Case Administration
Geoff Winkler	Emails with counsel re status	6/20/2022	0.1	315.00	31.50	Legal - Case Administration
John Hall	Staff meeting to discuss ongoing casework items.	6/20/2022	0.1	279.00	27.90	Legal - Case Administration
Josh McGraw	Team meeting discussing current and future tasks	6/20/2022	0.1	225.00	22.50	Legal - Case Administration
Milana Barkhanoy	Team meeting to discuss outstanding tasks	6/20/2022	0.1	225.00	22.50	Legal - Case Administration
Milana Barkhanoy	Discussing case update and next steps with AMD	6/20/2022	0.2	225.00	45.00	Legal - Case Administration
Milana Barkhanoy	Multiple emails with MP from AL re payout distribution	6/20/2022	0.2	225.00	45.00	Legal - Case Administration
Sam Parker	Team meeting discussing current and future tasks	6/20/2022	0.1	175.00	17.50	Legal - Case Administration
John Hall	Discuss outstanding claims and tax issues with MP and JdC.	6/20/2022	0.3	279.00	83.70	Legal - Claims Administration and Objections
Amanda Deering	Discussing asset sale re: AP, CN and art	6/21/2022	0.2	225.00	45.00	Legal - Asset Analysis and Recovery
Amanda Deering	Communication with broker re: sale of assets, reviewing contract and sending to GB	6/21/2022	0.6	225.00	135.00	Legal - Asset Analysis and Recovery
Amanda Deering	Discussing sale of AP shares with broker	6/21/2022	0.4	225.00	90.00	Legal - Asset Analysis and Recovery
Milana Barkhanoy	Email from FW re asset status and next steps	6/21/2022	0.1	225.00	22.50	Legal - Asset Analysis and Recovery
Geoff Winkler	Prepare for mediation	6/21/2022	0.6	315.00	189.00	Legal - Case Administration
Geoff Winkler	Mediation session for clawback litigation	6/21/2022	3.0	315.00	945.00	Legal - Case Administration
Milana Barkhanoy	Reviewing current tasks with AMD, determining next steps	6/21/2022	0.3	225.00	67.50	Legal - Case Administration
Milana Barkhanoy	Multiple emails with counsel re claimant payouts	6/21/2022	0.2	225.00	45.00	Legal - Case Administration
Milana Barkhanoy	Email to AK re asset status	6/22/2022	0.1	225.00	22.50	Legal - Asset Analysis and Recovery

SEC v. Essex Capital Corporation
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Milana Barkhanoy	Reviewing asset documentation	6/22/2022	0.4	225.00	90.00	Legal - Asset Analysis and Recovery
Milana Barkhanoy	Email from AK re asset status	6/22/2022	0.1	225.00	22.50	Legal - Asset Analysis and Recovery
Milana Barkhanoy	Communication to AK with instructions on next steps in asset transfer	6/22/2022	0.1	225.00	22.50	Legal - Asset Analysis and Recovery
Milana Barkhanoy	Updating Stretto with asset detail	6/22/2022	0.4	225.00	90.00	Legal - Asset Analysis and Recovery
Geoff Winkler	Communication from MBB re estate forecast	6/22/2022	0.1	315.00	31.50	Legal - Case Administration
John Hall	Communication from MBB re estate forecast	6/22/2022	0.1	279.00	27.90	Legal - Case Administration
Josh McGraw	Confirming claimant information	6/22/2022	0.1	225.00	22.50	Legal - Case Administration
Milana Barkhanoy	Multiple emails with MP from AM re claimant payouts	6/22/2022	0.2	225.00	45.00	Legal - Case Administration
Milana Barkhanoy	Call with MP from AM re estate forecast	6/22/2022	0.2	225.00	45.00	Legal - Case Administration
Milana Barkhanoy	Email communication to MP from AM providing estate forecast summary	6/22/2022	0.1	225.00	22.50	Legal - Case Administration
Milana Barkhanoy	Email to GBW and JBH re estate forecast	6/22/2022	0.1	225.00	22.50	Legal - Case Administration
Milana Barkhanoy	Chat with JPM re claimant	6/22/2022	0.1	225.00	22.50	Legal - Case Administration
John Hall	Review statements and request additional information from EWB.	6/23/2022	0.4	279.00	111.60	Financial - Tax Issues
Milana Barkhanoy	Multiple emails with JC and JBH re additional documents for and update on 2018 tax	6/23/2022	0.3	225.00	67.50	Financial - Tax Issues
Milana Barkhanoy	Downloading bank statements and communication with JBH re next steps	6/23/2022	0.6	225.00	135.00	Financial - Tax Issues
Amanda Deering	Communication re: sale of asset	6/23/2022	0.1	225.00	22.50	Legal - Asset Analysis and Recovery
Geoff Winkler	Work with bank, vendor re medallion guarantee	6/23/2022	0.2	315.00	63.00	Legal - Case Administration
Geoff Winkler	Emails with bank re statements for taxes	6/23/2022	0.1	315.00	31.50	Legal - Case Administration
Milana Barkhanoy	Call with JBH re items for upcoming call with counsel	6/23/2022	0.1	225.00	22.50	Legal - Case Administration
Milana Barkhanoy	Email to JBH and CBW re items for upcoming call with counsel	6/23/2022	0.1	225.00	22.50	Legal - Case Administration
Milana Barkhanoy	Email to counsel re items for upcoming call	6/23/2022	0.1	225.00	22.50	Legal - Case Administration
Geoff Winkler	Review request from tax preparer, discussion with JBH	6/24/2022	0.2	315.00	63.00	Financial - Tax Issues
Milana Barkhanoy	Email from a claimant	6/24/2022	0.1	225.00	22.50	Legal - Case Administration
Milana Barkhanoy	Gathering claim details and responding to a claimant	6/24/2022	0.2	225.00	45.00	Legal - Case Administration
Amanda Deering	Team meeting discussing current and future tasks	6/27/2022	0.1	225.00	22.50	Legal - Case Administration
Geoff Winkler	Emails with MW re medallion guarantee	6/27/2022	0.1	315.00	31.50	Legal - Case Administration
Geoff Winkler	Emails with counsel re contact with DM	6/27/2022	0.1	315.00	31.50	Legal - Case Administration
Josh McGraw	Team meeting discussing current and future tasks	6/27/2022	0.1	225.00	22.50	Legal - Case Administration
Milana Barkhanoy	Call with a claimant	6/27/2022	0.5	225.00	112.50	Legal - Case Administration
Milana Barkhanoy	Gathering detail for a call with claimant	6/27/2022	0.2	225.00	45.00	Legal - Case Administration
Milana Barkhanoy	Verifying claimant contact detail	6/27/2022	0.1	225.00	22.50	Legal - Case Administration
Sam Parker	Team meeting discussing current and future tasks	6/27/2022	0.1	175.00	17.50	Legal - Case Administration
John Hall	Review received bank statements and follow up with further needs from JB.	6/28/2022	0.5	279.00	139.50	Financial - Accounting/Auditing
Amanda Deering	Communication with counsel and the receiver re: sale of asset	6/28/2022	0.8	225.00	180.00	Legal - Asset Analysis and Recovery
John Hall	Review outstanding billing issues with GBW.	6/28/2022	0.1	279.00	27.90	Legal - Case Administration
Josh McGraw	Communication with SBP regarding investor calls	6/28/2022	0.1	225.00	22.50	Legal - Case Administration
Josh McGraw	Call with the claimant and reviewing information prior to call	6/28/2022	0.4	225.00	90.00	Legal - Case Administration
Josh McGraw	Communication with JPM regarding investor calls	6/28/2022	0.1	225.00	22.50	Legal - Case Administration
Sam Parker	Communication with JPM regarding investor calls	6/28/2022	0.1	175.00	17.50	Legal - Case Administration
Milana Barkhanoy	Multiple emails with JB	6/29/2022	0.1	225.00	22.50	Legal - Case Administration
Milana Barkhanoy	Email to JC providing requested bank statements for tax reporting	6/30/2022	0.1	225.00	22.50	Financial - Tax Issues
Geoff Winkler	Meeting with counsel to discuss litigation status and settlement	6/30/2022	0.5	315.00	157.50	Legal - Case Administration
John Hall	Meet with GBW MBB JdC and MF to discuss outstanding case issues.	6/30/2022	0.5	279.00	139.50	Legal - Case Administration
Milana Barkhanoy	Reviewing bank statements received from JB	6/30/2022	0.3	225.00	67.50	Legal - Case Administration
Milana Barkhanoy	Communication with JBH re statements received from JB	6/30/2022	0.1	225.00	22.50	Legal - Case Administration
Milana Barkhanoy	Organizing files with bank statements from JB	6/30/2022	0.2	225.00	45.00	Legal - Case Administration
Milana Barkhanoy	Reviewing files with bank statements from JB	6/30/2022	0.2	225.00	45.00	Legal - Case Administration

SEC v. Essex Capital Corporation
Summary of Fees of Receiver and Retained Personnel
April 1, 2022 - June 30, 2022
(Sorted in Chronological Order by Activity Category)

Attachment 1

Personnel	Item / Description	Date	Hours	Rate	Amount	Activity Category
Milana Barkhanoy	Email from JBH re claimant payout	6/30/2022	0.1	225.00	22.50	Legal - Case Administration
Milana Barkhanoy	Email to JBH with claimant payout detail	6/30/2022	0.1	225.00	22.50	Legal - Case Administration
Totals			493.8		\$ 115,043.50	

SEC v. Essex Capital Corporation
 Summary of Fees of Receiver and Retained Personnel
 April 1, 2022 - June 30, 2022
 (Sorted in Chronological Order by Activity Category)

Attachment 1

Personnel	Item / Description	Date	Hours	Rate	Amount	Activity Category
Summary by Activity Category and Personnel						
Financial - Accounting/Auditing	Personnel	Firm	Hours	Rate	Amount	
Financial - Accounting/Auditing	Geoff Winkler	AFS	5.5	315.00	\$ 1,732.50	
Financial - Accounting/Auditing	John Hall	AFS	15.6	279.00	\$ 4,352.40	
Financial - Accounting/Auditing	Amanda Deering	AFS	0.0	225.00	\$ -	
Financial - Accounting/Auditing	Josh McGraw	AFS	0.0	225.00	\$ -	
Financial - Accounting/Auditing	Milana Barkhanoy	AFS	1.6	225.00	\$ 360.00	
Financial - Accounting/Auditing	Sam Parker	AFS	0.0	175.00	\$ -	
Financial - Accounting/Auditing	Ysabel Willits	AFS	51.1	150.00	\$ 7,665.00	
			<u>73.8</u>		<u>\$ 14,109.90</u>	
Financial - Business Analysis	Personnel	Firm	Hours	Rate	Amount	
Financial - Business Analysis	Geoff Winkler	AFS	0.0	315.00	\$ -	
Financial - Business Analysis	John Hall	AFS	0.0	279.00	\$ -	
Financial - Business Analysis	Renee Dieffenderfer	AFS	0.0	225.00	\$ -	
Financial - Business Analysis	Josh McGraw	AFS	0.0	225.00	\$ -	
Financial - Business Analysis	Milana Barkhanoy	AFS	0.3	225.00	\$ 67.50	
Financial - Business Analysis	Ysabel Willits	AFS	0.0	150.00	\$ -	
			<u>0.3</u>		<u>\$ 67.50</u>	
Financial - Corporate Finance	Personnel	Firm	Hours	Rate	Amount	
Financial - Corporate Finance	Geoff Winkler	AFS	0.0	315.00	\$ -	
Financial - Corporate Finance	John Hall	AFS	0.0	279.00	\$ -	
Financial - Corporate Finance	Renee Dieffenderfer	AFS	0.0	225.00	\$ -	
Financial - Corporate Finance	Josh McGraw	AFS	0.0	225.00	\$ -	
Financial - Corporate Finance	Milana Barkhanoy	AFS	0.0	225.00	\$ -	
Financial - Corporate Finance	Ysabel Willits	AFS	0.0	150.00	\$ -	
			<u>0.0</u>		<u>\$ -</u>	
Financial - Data Analysis	Personnel	Firm	Hours	Rate	Amount	
Financial - Data Analysis	Geoff Winkler	AFS	0.0	315.00	\$ -	
Financial - Data Analysis	John Hall	AFS	0.0	279.00	\$ -	
Financial - Data Analysis	Amanda Deering	AFS	0.0	225.00	\$ -	
Financial - Data Analysis	Josh McGraw	AFS	0.0	225.00	\$ -	
Financial - Data Analysis	Milana Barkhanoy	AFS	4.3	225.00	\$ 967.50	
Financial - Data Analysis	Sam Parker	AFS	0.0	175.00	\$ -	
Financial - Data Analysis	Ysabel Willits	AFS	0.6	150.00	\$ 90.00	
			<u>4.9</u>		<u>\$ 1,057.50</u>	
Financial - Forensic Accounting	Personnel	Firm	Hours	Rate	Amount	
Financial - Forensic Accounting	Geoff Winkler	AFS	0.0	315.00	\$ -	
Financial - Forensic Accounting	John Hall	AFS	6.8	279.00	\$ 1,897.20	
Financial - Forensic Accounting	Amanda Deering	AFS	0.0	225.00	\$ -	
Financial - Forensic Accounting	Josh McGraw	AFS	0.0	225.00	\$ -	
Financial - Forensic Accounting	Milana Barkhanoy	AFS	0.0	225.00	\$ -	
Financial - Forensic Accounting	Sam Parker	AFS	0.0	175.00	\$ -	

SEC v. Essex Capital Corporation
Summary of Fees of Receiver and Retained Personnel
April 1, 2022 - June 30, 2022
(Sorted in Chronological Order by Activity Category)

Attachment 1

Personnel	Item / Description	Date	Hours	Rate	Amount	Activity Category
Financial - Forensic Accounting	Ysabel Willits	AFS	0.0	150.00	\$ -	
			6.8		\$ 1,897.20	
Financial - Litigation Consulting	Personnel	Firm	Hours	Rate	Amount	
Financial - Litigation Consulting	Geoff Winkler	AFS	0.0	315.00	\$ -	
Financial - Litigation Consulting	John Hall	AFS	18.2	279.00	\$ 5,077.80	
Financial - Litigation Consulting	Amanda Deering	AFS	0.0	225.00	\$ -	
Financial - Litigation Consulting	Josh McGraw	AFS	0.0	225.00	\$ -	
Financial - Litigation Consulting	Milana Barkhanoy	AFS	30.1	225.00	\$ 6,772.50	
Financial - Litigation Consulting	Sam Parker	AFS	0.0	175.00	\$ -	
Financial - Litigation Consulting	Ysabel Willits	AFS	31.1	150.00	\$ 4,665.00	
			79.4		\$ 16,515.30	
Financial - Status Reports	Personnel	Firm	Hours	Rate	Amount	
Financial - Status Reports	Geoff Winkler	AFS	0.0	315.00	\$ -	
Financial - Status Reports	John Hall	AFS	0.0	279.00	\$ -	
Financial - Status Reports	Amanda Deering	AFS	0.0	225.00	\$ -	
Financial - Status Reports	Josh McGraw	AFS	0.0	225.00	\$ -	
Financial - Status Reports	Milana Barkhanoy	AFS	0.0	225.00	\$ -	
Financial - Status Reports	Sam Parker	AFS	0.0	175.00	\$ -	
Financial - Status Reports	Ysabel Willits	AFS	0.0	150.00	\$ -	
			0.0		\$ -	
Financial - Tax Issues	Personnel	Firm	Hours	Rate	Amount	
Financial - Tax Issues	Geoff Winkler	AFS	1.5	315.00	\$ 472.50	
Financial - Tax Issues	John Hall	AFS	25.1	279.00	\$ 7,002.90	
Financial - Tax Issues	Amanda Deering	AFS	0.0	225.00	\$ -	
Financial - Tax Issues	Josh McGraw	AFS	1.2	225.00	\$ 270.00	
Financial - Tax Issues	Milana Barkhanoy	AFS	3.1	225.00	\$ 697.50	
Financial - Tax Issues	Sam Parker	AFS	0.0	175.00	\$ -	
Financial - Tax Issues	Ysabel Willits	AFS	0.6	150.00	\$ 90.00	
			31.5		\$ 8,532.90	
Financial - Valuation	Personnel	Firm	Hours	Rate	Amount	
Financial - Valuation	Geoff Winkler	AFS	0.0	315.00	\$ -	
Financial - Valuation	John Hall	AFS	0.0	279.00	\$ -	
Financial - Valuation	Amanda Deering	AFS	0.0	225.00	\$ -	
Financial - Valuation	Josh McGraw	AFS	0.0	225.00	\$ -	
Financial - Valuation	Milana Barkhanoy	AFS	0.0	225.00	\$ -	
Financial - Valuation	Sam Parker	AFS	0.0	175.00	\$ -	
Financial - Valuation	Ysabel Willits	AFS	0.0	150.00	\$ -	
			0.0		\$ -	
Legal - Asset Analysis and Recovery	Personnel	Firm	Hours	Rate	Amount	
Legal - Asset Analysis and Recovery	Geoff Winkler	AFS	4.5	315.00	\$ 1,417.50	
Legal - Asset Analysis and Recovery	John Hall	AFS	37.4	279.00	\$ 10,434.60	

SEC v. Essex Capital Corporation
Summary of Fees of Receiver and Retained Personnel
April 1, 2022 - June 30, 2022
(Sorted in Chronological Order by Activity Category)

Attachment 1

Personnel	Item / Description	Date	Hours	Rate	Amount	Activity Category
Legal - Asset Analysis and Recovery	Amanda Deering	AFS	11.9	225.00	\$ 2,677.50	
Legal - Asset Analysis and Recovery	Josh McGraw	AFS	5.3	225.00	\$ 1,192.50	
Legal - Asset Analysis and Recovery	Milana Barkhanoy	AFS	45.9	225.00	\$ 10,327.50	
Legal - Asset Analysis and Recovery	Sam Parker	AFS	0.0	175.00	\$ -	
Legal - Asset Analysis and Recovery	Ysabel Willits	AFS	7.2	150.00	\$ 1,080.00	
			112.2		\$ 27,129.60	
Legal - Asset Disposition	Personnel	Firm	Hours	Rate	Amount	
Legal - Asset Disposition	Geoff Winkler	AFS	1.2	315.00	\$ 378.00	
Legal - Asset Disposition	John Hall	AFS	7.0	279.00	\$ 1,953.00	
Legal - Asset Disposition	Amanda Deering	AFS	0.0	225.00	\$ -	
Legal - Asset Disposition	Josh McGraw	AFS	0.0	225.00	\$ -	
Legal - Asset Disposition	Milana Barkhanoy	AFS	0.0	225.00	\$ -	
Legal - Asset Disposition	Sam Parker	AFS	0.0	175.00	\$ -	
Legal - Asset Disposition	Ysabel Willits	AFS	0.0	150.00	\$ -	
			8.2		\$ 2,331.00	
Legal - Business Operations	Personnel	Firm	Hours	Rate	Amount	
Legal - Business Operations	Geoff Winkler	AFS	0.0	315.00	\$ -	
Legal - Business Operations	John Hall	AFS	0.0	279.00	\$ -	
Legal - Business Operations	Amanda Deering	AFS	1.5	225.00	\$ 337.50	
Legal - Business Operations	Josh McGraw	AFS	0.0	225.00	\$ -	
Legal - Business Operations	Milana Barkhanoy	AFS	0.0	225.00	\$ -	
Legal - Business Operations	Sam Parker	AFS	0.0	175.00	\$ -	
Legal - Business Operations	Ysabel Willits	AFS	0.0	150.00	\$ -	
			1.5		\$ 337.50	
Legal - Case Administration	Personnel	Firm	Hours	Rate	Amount	
Legal - Case Administration	Geoff Winkler	AFS	30.9	315.00	\$ 9,733.50	
Legal - Case Administration	John Hall	AFS	22.1	279.00	\$ 6,165.90	
Legal - Case Administration	Amanda Deering	AFS	10.4	225.00	\$ 2,340.00	
Legal - Case Administration	Josh McGraw	AFS	18.2	225.00	\$ 4,095.00	
Legal - Case Administration	Milana Barkhanoy	AFS	79.5	225.00	\$ 17,887.50	
Legal - Case Administration	Sam Parker	AFS	1.3	175.00	\$ 227.50	
Legal - Case Administration	Ysabel Willits	AFS	6.5	150.00	\$ 975.00	
			168.9		\$ 41,424.40	
Legal - Claims Administration and Objections	Personnel	Firm	Hours	Rate	Amount	
Legal - Claims Administration and Objections	Geoff Winkler	AFS	0.2	315.00	\$ 63.00	
Legal - Claims Administration and Objections	John Hall	AFS	3.8	279.00	\$ 1,060.20	
Legal - Claims Administration and Objections	Amanda Deering	AFS	0.0	225.00	\$ -	
Legal - Claims Administration and Objections	Josh McGraw	AFS	1.0	225.00	\$ 225.00	
Legal - Claims Administration and Objections	Milana Barkhanoy	AFS	1.3	225.00	\$ 292.50	
Legal - Claims Administration and Objections	Sam Parker	AFS	0.0	175.00	\$ -	
Legal - Claims Administration and Objections	Ysabel Willits	AFS	0.0	150.00	\$ -	
			6.3		\$ 1,640.70	

SEC v. Essex Capital Corporation
 Summary of Fees of Receiver and Retained Personnel
 April 1, 2022 - June 30, 2022
 (Sorted in Chronological Order by Activity Category)

Attachment 1

Personnel	Item / Description	Date	Hours	Rate	Amount	Activity Category
Overall Summary						
Totals	Personnel	Firm	Hours	Rate	Amount	
	Geoff Winkler	AFS	43.8	315.00	\$ 13,797.00	
	John Hall	AFS	136.0	279.00	\$ 37,944.00	
	Amanda Deering	AFS	23.8	225.00	\$ 5,355.00	
	Josh McGraw	AFS	25.7	225.00	\$ 5,782.50	
	Milana Barkhanoy	AFS	166.1	225.00	\$ 37,372.50	
	Sam Parker	AFS	1.3	175.00	\$ 227.50	
	Ysabel Willits	AFS	97.1	150.00	\$ 14,565.00	
			493.8		\$ 115,043.50	
	TOTAL FEES		493.8		\$ 115,043.50	

SEC v. Essex Capital Corporation
Summary of Expenses of Receiver and Retained Personnel
April 1, 2022 - June 30, 2022

Attachment 2

Incurred By	Payee	Item / Description	Date Incurred	Amount	Category
John Hall	PACER	Docket access	04/01/22	6.00	Internet/Online Fees
Geoff Winkler	Alaska Airline	Airfare	04/07/22	467.99	Airfare
Josh McGraw	USPS	Postage	04/18/22	4.33	Courier/Shipping/Freight
John Hall	USPS	Postage	04/23/22	27.79	Courier/Shipping/Freight
Geoff Winkler	Renaissance Hotel	Hotel	04/28/22	277.10	Hotel
John Hall	Extra Space Storage	Storage	04/29/22	135.00	Miscellaneous
Josh McGraw	Uhaul	Shipping	05/18/22	136.00	Courier/Shipping/Freight
Josh McGraw	Uhaul	Shipping	05/18/22	35.75	Courier/Shipping/Freight
Milana Barkhanoy	Milana Barkhanoy	Shipping	05/18/22	54.87	Courier/Shipping/Freight
John Hall	Extra Space Storage	Storage	05/31/22	135.00	Miscellaneous
John Hall	Extra Space Storage	Storage	06/30/22	135.00	Miscellaneous
Total				\$ 1,414.83	

	<i>John Hall</i>	<i>Geoff Winkler</i>	<i>Milana Barkhanoy</i>	<i>Josh McGraw</i>	<i>Total</i>
Airfare	-	467.99	-	-	467.99
Car Rental	-	-	-	-	-
Courier/Shipping/Freight	27.79	-	54.87	176.08	258.74
Fuel	-	-	-	-	-
Hotel	-	277.10	-	-	277.10
Individual Meals	-	-	-	-	-
Internet/Online Fees	6.00	-	-	-	6.00
Miscellaneous	405.00	-	-	-	405.00
Office Supplies	-	-	-	-	-
Parking	-	-	-	-	-
Personal Car Mileage	-	-	-	-	-
Printing/Photocopying/Stationery	-	-	-	-	-
Taxi	-	-	-	-	-
Total	438.79	745.09	54.87	176.08	1,414.83

**SEC v. Essex Capital Corporation
Receivership Estate Balance Sheet
April 1, 2022 - June 30, 2022**

Attachment 3

Assets:

Cash	\$	4,612,073.54
Loan Receivable	\$	-
Marketable Securities	\$	-
Net Lease Receivables	\$	-
Real Property ¹	\$	-
Equipment Residual Value ¹	\$	-
Private Equity Investments ¹	\$	2,533,084.40
Existing Litigation ^{2,3}	\$	-
Third Party Litigation ^{2,3}	\$	5,532,782.53
Professional Liability Litigation ^{2,3}	\$	-

Total Assets

\$ 12,677,940.47

Liabilities:

State/Federal Taxes ⁴	\$	-
Property Taxes ⁴	\$	-
Total Liabilities	\$	-

Claims:1

Investors	\$	39,780,165.49
Creditors	\$	114,603.92
Total Claims	\$	39,894,769.41

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
April 1, 2022 - June 30, 2022

Attachment 4

Beginning Balance of Cash in Receivership Estate on April 1, 2022	\$ 4,298,879.22
Deposits:	\$ 750,217.47
Payments:	\$ (437,023.15)
Ending Balance of Cash in Receivership Estate on June 30, 2022	<u>\$ 4,612,073.54</u>

EXHIBIT 2

08/03/22 17:15:05 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: 04/29/22

Matter Name: General Receivership

Proforma Number: 1175209

Client/Matter Joint Group # 378224-1

Client Matter Number:

Fees for Matter 378224.00002.(General Receivership)

Trans Date	Index	Description of Service Rendered	Timekeeper	Hours	Fees	Sum	Circle	Action		
04/05/22	8784613	Detailed inventory of critical outstanding case administration tasks and prepare memorandum and notes for discussion regarding same (2.0); confer with counsel regarding same (0.5).	Del Castillo, Joshua	2.50	1,608.75	1,608.75	WO	HD	TR	_____
04/07/22	8786623	Attention to critical case administration matters and confer with counsel and Receiver's office regarding same (1.1); prepare for and attend team meeting with Receiver's office (0.6).	Del Castillo, Joshua	1.70	1,093.95	2,702.70	WO	HD	TR	_____
04/08/22	8787844	Review docket for Winkler matters and update case tracking chart (.8); draft email to J del Castillo and M. Pham regarding same (.2).	O'Neal, Mikayla	1.00	346.50	3,049.20	WO	HD	TR	_____
04/11/22	8790067	Review and analysis regarding QSF inquiry from Receiver and prepare response regarding same (0.5).	Del Castillo, Joshua	0.50	321.75	3,370.95	WO	HD	TR	_____
04/14/22	8793380	Prepare for and attend meeting with Receiver's personnel (0.6).	Del Castillo, Joshua	0.60	386.10	3,757.05	WO	HD	TR	_____

08/03/22 17:15:05 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		
04/14/22	8813163	Virtually attend weekly client meeting regarding case update and outstanding tasks	Pham, Matt D.	0.50	207.00	3,964.05	WO	HD	TR	_____
04/20/22	8798390	Review recent Court orders and confer with Receiver's office regarding same (0.2).	Del Castillo, Joshua	0.20	128.70	4,092.75	WO	HD	TR	_____
04/21/22	8800213	Prepare for and attend team call with Receiver's office (1.0).	Del Castillo, Joshua	1.00	643.50	4,736.25	WO	HD	TR	_____
04/21/22	8801256	Review dockets and calendar for all Winkler matters and add deadlines to tracking chart (.9); draft email to J. del Castillo and M. Pham with updates of deadlines (.2)	O'Neal, Mikayla	1.10	381.15	5,117.40	WO	HD	TR	_____
04/21/22	8813235	Virtually attend weekly client meeting regarding outstanding issues and tasks	Pham, Matt D.	1.00	414.00	5,531.40	WO	HD	TR	_____
04/27/22	8806786	Emails with Receiver regarding tax correspondence received and analysis in connection with same (0.4).	Del Castillo, Joshua	0.40	257.40	5,788.80	WO	HD	TR	_____
05/02/22	8815561	Review notes and emails with counsel regarding case administration issues (0.5).	Del Castillo, Joshua	0.50	321.75	6,110.55	WO	HD	TR	_____
05/04/22	8817625	Attention to outstanding receivership administration matters and emails and teleconferences regarding same (1.1).	Del Castillo, Joshua	1.10	707.85	6,818.40	WO	HD	TR	_____
05/06/22	8821294	Check docket and calendar for all Winkler matters and update tracking chart (1.1); draft email to M. Pham and J. del Castillo regarding same (.2).	O'Neal, Mikayla	1.30	450.45	7,268.85	WO	HD	TR	_____

08/03/22 17:15:05 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		
05/12/22	8824925	Teleconferences and emails with counsel and Receiver's office and attention to and inventory of critical outstanding case administration matters (2.8).	Del Castillo, Joshua	2.80	1,801.80	9,070.65	WO	HD	TR	_____
05/12/22	8846209	Virtually attend weekly meeting with client	Pham, Matt D.	0.40	165.60	9,236.25	WO	HD	TR	_____
05/19/22	8832751	Prepare for and attend call with Receiver's office (0.5).	Del Castillo, Joshua	0.50	321.75	9,558.00	WO	HD	TR	_____
05/23/22	8836086	Emails and teleconferences regarding pending estate administration matters (0.4).	Del Castillo, Joshua	0.40	257.40	9,815.40	WO	HD	TR	_____
05/24/22	8838193	Attention to case administration matters (0.6).	Del Castillo, Joshua	0.60	386.10	10,201.50	WO	HD	TR	_____
06/02/22	8851764	Prepare for and attend team call with Receiver's office and counsel (0.5).	Del Castillo, Joshua	0.50	321.75	10,523.25	WO	HD	TR	_____
06/02/22	8882609	Participate in weekly client meeting regarding outstanding matters	Pham, Matt D.	0.40	165.60	10,688.85	WO	HD	TR	_____
06/30/22	8879369	Review notes and emails, confer with counsel, and attention to case administration matters (0.6); prepare for and attend call with Receiver's office (0.6).	Del Castillo, Joshua	1.20	772.20	11,461.05	WO	HD	TR	_____

Disbursements for Matter 378224.00002 (General Receivership)

Trans Date	Index	Type	Quantity	Amt	Circle	Action		
04/01/22	2760561	EDISC – CS Disco, Inc. - Monthly Hosting for April 2022	0.00	2,083.43	WO	HD	TR	_____

08/03/22 17:15:05 PROFORMA STATEMENT FOR MATTER 378224.00002 (Winkler, Geoff/Receiver for Essex Capita) (General Receivership)

Disbursements for Matter 378224.00002 (General Receivership)

Trans Date	Index	Type	Quantity	Amt				
04/07/22	2761231	DCSRCH – Document Search - - PACER - 1/22 - 3/22 Usage	0.00	0.70	WO	HD	TR	_____
04/07/22	2761232	DCSRCH – Document Search - - PACER - 1/22 - 3/22 Usage	0.00	0.30	WO	HD	TR	_____
04/07/22	2761233	DCSRCH – Document Search - - PACER - 1/22 - 3/22 Usage	0.00	1.80	WO	HD	TR	_____
04/14/22	2760620	BW – Duplication - Black & White Copies	811.00	154.09	WO	HD	TR	_____
05/01/22	2765487	EDISC – CS Disco, Inc. - Monthly Hosting for May 2022	0.00	2,489.14	WO	HD	TR	_____
06/01/22	2769555	EDISC – CS Disco, Inc. - Monthly Hosting for June 2022	0.00	2,181.36	WO	HD	TR	_____

Proforma Summary

Timekeeper

Number	Timekeeper	Hours	Rate	Amounts
001842	Del Castillo, Joshua	14.50	643.50	9,330.75
002396	O'Neal, Mikayla	3.40	346.50	1,178.10
002510	Pham, Matt D.	2.30	414.00	952.20
		20.20		\$11,461.05
Subtotal Fees				\$11,461.05
Discount				0.00
Total Fees				11,461.05
Total Disbursements				6,910.82

Attorney Billing Instructions

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

Billing Instructions

expires 6/30/2023: 10% off standard rates (automatic)

Account Summary – As Of 08/03/22

08/03/22 17:15:05 PROFORMA STATEMENT FOR MATTER 378224.00002 (Winkler, Geoff/Receiver for Essex Capita) (General Receivership)

	Fiscal YTD			Calendar YTD			LTD		
	Total	Fees	Disb.	Total	Fees	Disb.	Total	Fees	Disbursements
Worked	4,170.60	4,170.60	0.00	43,043.11	29,322.45	13,720.66	259,388.59	198,506.47	60,882.12
Unbilled Adj	0.00	0.00	0.00	0.00	0.00	0.00	3,678.96	3,559.27	119.69
Billed	0.00	0.00	0.00	46,779.47	32,011.65	14,767.82	154,458.90	154,458.90	47,161.46
Collected	0.00	0.00	0.00	46,779.47	32,011.65	14,767.82	201,620.36	154,458.90	47,161.46
AR Write Off	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00
	Total	Fees	Costs						
WIP Balance	47,474.41	29,322.45	18,151.96						
AR Balance	0.00	0.00	0.00						
Unalloc Payment	0.00								
Client Trust Balance	0.00								

Billing Address

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

08/03/22 17:15:06 PROFORMA STATEMENT FOR MATTER 378224.00003 (Winkler, Geoff/Receiver for Essex Capita) (Asset Recovery & Management)

Preliminary Billing Form

Billing Atty: 001842 - Del Castillo, Matter #: 378224.00003 Client Name: Winkler, Geoff/Receiver for Essex Capita
 Joshua
 Date of Last Billing: 04/29/22 Matter Name: Asset Recovery & Management
 Proforma Number: 1175209
 Client/Matter Joint Group # 378224-1 Client Matter Number:

Fees for Matter 378224.00003.(Asset Recovery & Management)

Trans Date	Index	Description of Service Rendered	Timekeeper	Hours	Fees	Sum	Circle	Action		
04/05/22	8784953	Analysis of substantive and procedural settlement issues arising in connection with pending disgorgement matters; confer with counsel regarding same (1.3).	Del Castillo, Joshua	1.30	836.55	836.55	WO	HD	TR	_____
04/05/22	8790899	Email/evaluate issues related to the fraudulent conveyance actions, coordination of settlement/mediation meeting with counsel and provide advice.	Zaro, David	0.60	502.20	1,338.75	WO	HD	TR	_____
04/06/22	8786037	Review documents and legal analysis in connection with supplemental disgorgement arguments and prospective settlement approaches (2.2).	Del Castillo, Joshua	2.20	1,415.70	2,754.45	WO	HD	TR	_____
04/13/22	8792203	Emails and confer with counsel regarding pending discovery in disgorgement matters (0.9).	Del Castillo, Joshua	0.90	579.15	3,333.60	WO	HD	TR	_____
04/14/22	8793077	Initial legal analysis for recovery of non-fraudulent transfer funds held by third parties and confer with counsel regarding same (1.2); analysis of issues regarding pending disgorgement actions and novel	Del Castillo, Joshua	3.20	2,059.20	5,392.80	WO	HD	TR	_____

08/03/22 17:15:06 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		
		defenses by disgorgement defendants (2.0).								
04/20/22	8798334	Legal analysis of issues relating to accounting discoveries and clawbacks in connection with pending and anticipated discovery in disgorgement actions; confer regarding same (2.2).	Del Castillo, Joshua	2.20	1,415.70	6,808.50	WO	HD	TR	_____
04/29/22	8811345	Attention to pending asset recovery matters, contemplated matters, and outstanding tasks and legal analysis regarding same (2.4); review materials in connection with CVL-related demand letter (0.4).	Del Castillo, Joshua	2.80	1,801.80	8,610.30	WO	HD	TR	_____
05/06/22	8819665	Attention to issues regarding settlement of pending disgorgement demands and litigation; emails regarding same (2.2).	Del Castillo, Joshua	2.20	1,415.70	10,026.00	WO	HD	TR	_____
05/12/22	8825554	Review and respond to correspondence from Receiver's office regarding A. Liddiard and attention to issues regarding same (0.6).	Del Castillo, Joshua	0.60	386.10	10,412.10	WO	HD	TR	_____
05/12/22	8832503	Several emails/conference with counsel, then attend meeting with Receiver team to address clawback actions, settlement and related issues.	Zaro, David	0.70	585.90	10,998.00	WO	HD	TR	_____
05/13/22	8826331	Review documents and prepare demand regarding A. Liddiard settlement (0.5); confer with counsel regarding same (0.3).	Del Castillo, Joshua	0.80	514.80	11,512.80	WO	HD	TR	_____
05/13/22	8830979	Call/email with counsel related to global settlement issues, follow-up (.4).	Zaro, David	0.80	669.60	12,182.40	WO	HD	TR	_____

08/03/22 17:15:06 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		
		Review/evaluate several settlements, coordination of the cases, discovery and follow-u (.4),								
05/27/22	8842710	Attention to pending asset recovery issues (0.6); legal analysis of issues arising in connection with same (3.0).	Del Castillo, Joshua	3.60	2,316.60	14,499.00	WO	HD	TR	_____
05/31/22	8847381	Legal analysis and detailed document review in connection with pending asset recovery matters (2.5).	Del Castillo, Joshua	2.50	1,608.75	16,107.75	WO	HD	TR	_____
06/01/22	8850488	Confer extensively with law clerk regarding necessary research regarding recovery of attorneys' fees against obstructionist profiting investors; emails regarding same (1.0).	Del Castillo, Joshua	1.00	643.50	16,751.25	WO	HD	TR	_____
06/02/22	8851541	Review and respond to correspondence regarding legal research regarding attorneys' fees in obstructionist profiting investor actions (0.5); emails and teleconferences regarding outstanding settlement payments (0.6).	Del Castillo, Joshua	1.10	707.85	17,459.10	WO	HD	TR	_____
06/09/22	8863758	Analysis of litigation strategy related to pending cases and several emails, meeting with counsel, Receiver to provide legal advice.	Zaro, David	0.40	334.80	17,793.90	WO	HD	TR	_____
06/14/22	8862035	Review notes and confer with counsel and email to I. Kallick regarding funds held by MBT in connection with CVL settlement (0.3); confer with Receiver and counsel regarding same (0.3); review correspondence from and teleconference	Del Castillo, Joshua	1.10	707.85	18,501.75	WO	HD	TR	_____

08/03/22 17:15:06 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 D. Zaro regarding necessary corrections to CVL revisions to settlement agreement (0.5).								
06/14/22	8864893	Analysis of the prospective issues as to statute of limitations, follow-up to assess impact on claims (.6). Call with counsel related to the recovery of accounts, follow-up to advise as to legal issues regarding attorney accounts, bank accounts, lien rights (1.2).	Zaro, David	1.80	1,506.60	20,008.35	WO	HD	TR	_____
06/15/22	8866141	Several conferences/emails to address the coordination of pending claw back cases, advice to counsel as to settlement and motion for summary judgment strategy.	Zaro, David	0.60	502.20	20,510.55	WO	HD	TR	_____
06/17/22	8866138	Teleconference with I. Kallick regarding funds held by MBT (0.2).	Del Castillo, Joshua	0.20	128.70	20,639.25	WO	HD	TR	_____
06/20/22	8867728	Emails and teleconferences regarding pending and anticipated discovery in remaining disgorgement actions; review documents in connection with same (0.9).	Del Castillo, Joshua	0.90	579.15	21,218.40	WO	HD	TR	_____
06/23/22	8871789	Review and confer regarding outstanding discovery in pending disgorgement litigation (0.6).	Del Castillo, Joshua	0.60	386.10	21,604.50	WO	HD	TR	_____

Proforma Summary

Timekeeper Number	Timekeeper	Hours	Rate	Amounts
000313	Zaro, David	4.90	837.00	4,101.30
001842	Del Castillo, Joshua	27.20	643.50	17,503.20
		<u>32.10</u>		<u>\$21,604.50</u>

08/03/22 17:15:06 PROFORMA STATEMENT FOR MATTER 378224.00003 (Winkler, Geoff/Receiver for Essex Capita) (Asset Recovery & Management)

Proforma Summary

Timekeeper

Number	Timekeeper	Hours	Rate	Amounts
	Subtotal Fees			\$21,604.50
	Discount			0.00
	Total Fees			21,604.50
	Total Disbursements			0.00

Attorney Billing Instructions

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

Billing Instructions

expires 6/30/2023: 10% off standard rates (automatic)

Account Summary – As Of 08/03/22

	Fiscal YTD			Calendar YTD			LTD		
	Total	Fees	Disb.	Total	Fees	Disb.	Total	Fees	Disbursements
Worked	2,576.40	2,093.40	483.00	59,741.90	59,084.10	657.80	894,600.47	893,831.17	769.30
Unbilled Adj	0.00	0.00	0.00	0.00	0.00	0.00	45,639.36	45,639.36	0.00
Billed	0.00	0.00	0.00	220,491.00	220,446.00	45.00	746,702.15	746,702.15	111.50
Collected	0.00	0.00	0.00	220,491.00	220,446.00	45.00	746,813.65	746,702.15	111.50
AR Write Off	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00
WIP	59,741.90	59,084.10	657.80						
Balance									
AR Balance	0.00	0.00	0.00						
Unalloc	0.00								
Payment									
Client Trust	0.00								
Balance									

Billing Address

Winkler, Geoff/Receiver for Essex Capital Corporation

08/03/22 17:15:06 PROFORMA STATEMENT FOR MATTER 378224.00003 (Winkler, Geoff/Receiver for Essex Capita) (Asset Recovery & Management)

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

08/03/22 17:15:07 PROFORMA STATEMENT FOR MATTER 378224.00004 (Winkler, Geoff/Receiver for Essex Capita) (Investigation/Reporting)

Preliminary Billing Form

Billing Atty: 001842 - Del Castillo, Matter #: 378224.00004 Client Name: Winkler, Geoff/Receiver for Essex Capita
 Joshua
 Date of Last Billing: 04/29/22 Matter Name: Investigation/Reporting
 Proforma Number: 1175209
 Client/Matter Joint Group # 378224-1 Client Matter Number:

Fees for Matter 378224.00004.(Investigation/Reporting)

Trans Date	Index	Description of Service Rendered	Timekeeper	Hours	Fees	Sum	Circle	Action		
04/06/22	8785802	Complete revisions and comments to draft Supplemental Accounting Report and confer with counsel and Receiver's office regarding same (3.0).	Del Castillo, Joshua	3.00	1,930.50	1,930.50	WO	HD	TR	_____
04/11/22	8789730	Attention to issues regarding forthcoming interim report and supplemental forensic accounting report (0.9).	Del Castillo, Joshua	0.90	579.15	2,509.65	WO	HD	TR	_____
04/12/22	8791215	Confer with counsel and emails to Receiver's office regarding Supplemental Forensic Accounting Report (0.7).	Del Castillo, Joshua	0.70	450.45	2,960.10	WO	HD	TR	_____
04/14/22	8793384	Emails regarding status of Supplemental Forensic Accounting Report and related reporting issues (0.5).	Del Castillo, Joshua	0.50	321.75	3,281.85	WO	HD	TR	_____
04/21/22	8800215	Confer with Receiver's office and counsel regarding Receiver's Supplemental Forensic Accounting Report, review draft report, and prepare notice of filing for same (1.0).	Del Castillo, Joshua	1.00	643.50	3,925.35	WO	HD	TR	_____

08/03/22 17:15:07 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		
04/25/22	8803918	Attention to filing of forensic accounting report and emails to counsel regarding same (0.3).	Del Castillo, Joshua	0.30	193.05	4,118.40	WO	HD	TR	_____
05/11/22	8846193	Begin drafting 11th interim report and petition for further instructions	Pham, Matt D.	0.50	207.00	4,325.40	WO	HD	TR	_____
05/26/22	8841629	Attention to interim report issues and confer with counsel regarding same (0.4); review documents (0.6).	Del Castillo, Joshua	1.00	643.50	4,968.90	WO	HD	TR	_____
05/26/22	8846292	Continue drafting 11th interim report	Pham, Matt D.	0.60	248.40	5,217.30	WO	HD	TR	_____
06/14/22	8882814	Continue drafting 11th interim report - update various sections (0.9); Continue drafting 11th interim report - discussion regarding updates on CVL Action and Reyner II Action (1.0)	Pham, Matt D.	1.90	786.60	6,003.90	WO	HD	TR	_____
06/15/22	8863978	Emails and confer with Receiver's office and counsel regarding interim report and related accounting and claims issues (0.5).	Del Castillo, Joshua	0.50	321.75	6,325.65	WO	HD	TR	_____
06/15/22	8882822	Continue drafting 11th interim report - discussion regarding updates on disgorgement actions	Pham, Matt D.	1.20	496.80	6,822.45	WO	HD	TR	_____
06/20/22	8882896	Continue drafting 11th interim report - discussion regarding update on claims/distributions	Pham, Matt D.	1.50	621.00	7,443.45	WO	HD	TR	_____
06/21/22	8882928	Revise and update 11th interim report	Pham, Matt D.	0.50	207.00	7,650.45	WO	HD	TR	_____

08/03/22 17:15:07 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
06/24/22	8872952	Review and revise interim report (0.6).	Del Castillo, Joshua	0.60	386.10	8,036.55	WO	HD TR
06/30/22	8879371	Emails regarding status of and anticipated filing of first interim report (0.2).	Del Castillo, Joshua	0.20	128.70	8,165.25	WO	HD TR

Proforma Summary

Timekeeper

Number	Timekeeper	Hours	Rate	Amounts
001842	Del Castillo, Joshua	8.70	643.50	5,598.45
002510	Pham, Matt D.	6.20	414.00	2,566.80
		<u>14.90</u>		<u>\$8,165.25</u>
Subtotal Fees				\$8,165.25
Discount				0.00
Total Fees				8,165.25
Total Disbursements				0.00

Attorney Billing Instructions

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

Billing Instructions

expires 6/30/2023: 10% off standard rates (automatic)

Account Summary – As Of 08/03/22

	Fiscal YTD			Calendar YTD			LTD		
	Total	Fees	Disb.	Total	Fees	Disb.	Total	Fees	Disbursements
Worked	3,711.15	3,711.15	0.00	18,855.45	18,855.45	0.00	280,553.88	280,453.86	100.02
Unbilled Adj	0.00	0.00	0.00	0.00	0.00	0.00	23,360.67	23,360.67	0.00
Billed	0.00	0.00	0.00	26,038.80	26,038.80	0.00	227,162.34	227,162.34	100.02

08/03/22 17:15:07 PROFORMA STATEMENT FOR MATTER 378224.00004 (Winkler, Geoff/Receiver for Essex Capita) (Investigation/Reporting)

Collected	0.00	0.00	0.00	26,038.80	26,038.80	0.00	227,262.36	227,162.34	100.02
AR Write Off	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00
	Total	Fees	Costs						
WIP	18,855.45	18,855.45	0.00						
Balance									
AR Balance	0.00	0.00	0.00						
Unalloc	0.00								
Payment									
Client Trust	0.00								
Balance									

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

08/03/22 17:15:08 PROFORMA STATEMENT FOR MATTER 378224.00005 (Winkler, Geoff/Receiver for Essex Capita) (Investor Issues/Communications)

Preliminary Billing Form

Billing Atty: 001842 - Del Castillo, Matter #: 378224.00005 Client Name: Winkler, Geoff/Receiver for Essex Capita
 Joshua
 Date of Last Billing: 03/08/21 Matter Name: Investor Issues/Communications
 Proforma Number: 1175209
 Client/Matter Joint Group # 378224-1 Client Matter Number:

Fees for Matter 378224.00005.(Investor Issues/Communications)

Trans Date	Index	Description of Service Rendered	Timekeeper	Hours	Fees	Sum	Circle	Action	
05/06/22	8820125	Review and respond to investor inquiry (0.5).	Del Castillo, Joshua	0.50	321.75	321.75	WO	HD	TR
05/27/22	8842172	Review and respond to inquiries from investor regarding status of distribution and follow-up with counsel and Receiver's office regarding same (0.5).	Del Castillo, Joshua	0.50	321.75	643.50	WO	HD	TR

Proforma Summary

Timekeeper Number	Timekeeper	Hours	Rate	Amounts
001842	Del Castillo, Joshua	1.00	643.50	643.50
		1.00		\$643.50
Subtotal Fees				\$643.50
Discount				0.00
Total Fees				643.50
Total Disbursements				0.00

Attorney Billing Instructions

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

08/03/22 17:15:08 PROFORMA STATEMENT FOR MATTER 378224.00005 (Winkler, Geoff/Receiver for Essex Capita) (Investor Issues/Communications)

() BILL COST ONLY

() Transfer All

Billing Instructions

expires 6/30/2023: 10% off standard rates (automatic)

Account Summary – As Of 08/03/22

	Fiscal YTD			Calendar YTD			LTD		
	Total	Fees	Disb.	Total	Fees	Disb.	Total	Fees	Disbursements
Worked	550.80	550.80	0.00	1,387.35	1,387.35	0.00	14,876.81	14,833.80	43.01
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	12,795.75	12,795.75	43.01
Collected	0.00	0.00	0.00	0.00	0.00	0.00	12,838.76	12,795.75	43.01
AR Write Off	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00
	Total	Fees	Costs						
WIP	1,387.35	1,387.35	0.00						
Balance									
AR Balance	0.00	0.00	0.00						
Unalloc	0.00								
Payment									
Client Trust	0.00								
Balance									

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

08/03/22 17:15:09 PROFORMA STATEMENT FOR MATTER 378224.00006 (Winkler, Geoff/Receiver for Essex Capita) (Sale/Disposition/Transfer of Assets)

Preliminary Billing Form

Billing Atty: 001842 - Del Castillo, Matter #: 378224.00006 Client Name: Winkler, Geoff/Receiver for Essex Capita
 Joshua
 Date of Last Billing: 03/08/21 Matter Name: Sale/Disposition/Transfer of Assets
 Proforma Number: 1175209
 Client/Matter Joint Group # 378224-1 Client Matter Number:

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

Trans Date	Index	Description of Service Rendered	Timekeeper	Hours	Fees	Sum	Circle	Action	
06/21/22	8869312	Review ChowNow sales agreement and confer with counsel and Receiver's office regarding same (0.3).	Del Castillo, Joshua	0.30	193.05	193.05	WO	HD	TR
06/28/22	8876261	Review document forwarded by A. Deering in connection with prospective asset sale and confer regarding same (0.3).	Del Castillo, Joshua	0.30	193.05	386.10	WO	HD	TR

Proforma Summary

Timekeeper Number	Timekeeper	Hours	Rate	Amounts
001842	Del Castillo, Joshua	0.60	643.50	386.10
		0.60		\$386.10
	Subtotal Fees			\$386.10
	Discount			0.00
	Total Fees			386.10
	Total Disbursements			0.00

Attorney Billing Instructions

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

08/03/22 17:15:09 PROFORMA STATEMENT FOR MATTER 378224.00006 (Winkler, Geoff/Receiver for Essex Capita) (Sale/Disposition/Transfer of Assets)

Billing Instructions

expires 6/30/2023: 10% off standard rates (automatic)

Account Summary – As Of 08/03/22

	Fiscal YTD			Calendar YTD			LTD		
	Total	Fees	Disb.	Total	Fees	Disb.	Total	Fees	Disbursements
Worked	0.00	0.00	0.00	386.10	386.10	0.00	49,278.15	49,278.15	0.00
Unbilled Adj	0.00	0.00	0.00	0.00	0.00	0.00	315.00	315.00	0.00
Billed	0.00	0.00	0.00	0.00	0.00	0.00	45,890.55	45,890.55	0.00
Collected	0.00	0.00	0.00	0.00	0.00	0.00	45,890.55	45,890.55	0.00
AR Write Off	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00
	Total	Fees	Costs						
WIP	386.10	386.10	0.00						
Balance									
AR Balance	0.00	0.00	0.00						
Unalloc	0.00								
Payment									
Client Trust	0.00								
Balance									

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

08/03/22 17:15:10 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: 04/29/22 Matter Name: Claims/Distribution
 Proforma Number: 1175209
 Client/Matter Joint Group # 378224-1 Client Matter Number:

Fees for Matter 378224.00008.(Claims/Distribution)

Trans Date	Index	Description of Service Rendered	Timekeeper	Hours	Fees	Sum	Circle	Action		
05/20/22	8833566	Review and respond to inquiries regarding distribution status (0.6); analysis of issues in connection with prospective distribution and emails regarding same (0.4).	Del Castillo, Joshua	1.00	643.50	643.50	WO	HD	TR	_____
05/31/22	8847416	Analysis regarding tax issues relating to distribution and emails to Receiver's office regarding same (1.5); confer with counsel regarding potential motion to subordinate taxing entity claims in connection with anticipated distributions and review and assemble templates regarding same (1.5).	Del Castillo, Joshua	3.00	1,930.50	2,574.00	WO	HD	TR	_____
06/02/22	8851768	Analysis of claims issue presented by Receiver (0.5).	Del Castillo, Joshua	0.50	321.75	2,895.75	WO	HD	TR	_____
06/15/22	8882824	Review and analyze relevant filings from disgorgement actions; draft email to Milana Barkhanoy regarding settlement ranges for outstanding disgorgement actions	Pham, Matt D.	0.90	372.60	3,268.35	WO	HD	TR	_____
06/16/22	8882866	Draft email to Milana Barkhanoy regarding settled litigation for purposes of estimating distributions (0.2); Draft email to Milana	Pham, Matt D.	0.30	124.20	3,392.55	WO	HD	TR	_____

08/03/22 17:15:10 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	
		Barkhanoy regarding settlement amounts in concluded disgorgement actions (0.1)							
06/20/22	8867767	Teleconference with Receiver's office and confer with counsel regarding pending initial distribution calculation and related matters (0.4); review documents and prepare motion to subordinate taxing entity claims (2.0).	Del Castillo, Joshua	2.40	1,544.40	4,936.95	WO	HD	TR
06/20/22	8882893	Phone call with John Hall and Josh del Castillo regarding status of distributions	Pham, Matt D.	0.20	82.80	5,019.75	WO	HD	TR
06/21/22	8868603	Emails and teleconferences regarding claims and initial distribution matters (1.0).	Del Castillo, Joshua	1.00	643.50	5,663.25	WO	HD	TR
06/22/22	8882955	Virtually meet with Milana Barkhanoy regarding proposed distributions	Pham, Matt D.	0.10	41.40	5,704.65	WO	HD	TR

Proforma Summary

Timekeeper		Hours	Rate	Amounts
Number	Timekeeper			
001842	Del Castillo, Joshua	7.90	643.50	5,083.65
002510	Pham, Matt D.	1.50	414.00	621.00
		<u>9.40</u>		<u>\$5,704.65</u>
Subtotal Fees				\$5,704.65
Discount				0.00
Total Fees				5,704.65
Total Disbursements				0.00

Attorney Billing Instructions

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

08/03/22 17:15:10 PROFORMA STATEMENT FOR MATTER 378224.00008 (Winkler, Geoff/Receiver for Essex Capita) (Claims/Distribution)

() BILL COST ONLY

() Transfer All

Billing Instructions

expires 6/30/2023: 10% off standard rates (automatic)

Account Summary – As Of 08/03/22

	Fiscal YTD			Calendar YTD			LTD		
	Total	Fees	Disb.	Total	Fees	Disb.	Total	Fees	Disbursements
Worked	2,203.20	2,203.20	0.00	15,381.45	15,381.45	0.00	142,425.90	142,425.90	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	0.00	0.00	0.00	33,940.35	33,940.35	0.00	118,787.40	118,787.40	0.00
Collected	0.00	0.00	0.00	33,940.35	33,940.35	0.00	118,787.40	118,787.40	0.00
AR Write Off	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00
	Total	Fees	Costs						
WIP	15,381.45	15,381.45	0.00						
Balance									
AR Balance	0.00	0.00	0.00						
Unalloc	0.00								
Payment									
Client Trust	0.00								
Balance									

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

08/03/22 17:15:12 PROFORMA STATEMENT FOR MATTER 378224.00009 (Winkler, Geoff/Receiver for Essex Capita) (Third Party Claims & Recoveries)

Preliminary Billing Form

Billing Atty: 001842 - Del Castillo, Joshua
 Date of Last Billing: 01/11/22
 Proforma Number: 1175209
 Client/Matter Joint Group # 378224-1

Matter #: 378224.00009

Client Name: Winkler, Geoff/Receiver for Essex Capita
 Matter Name: Third Party Claims & Recoveries
 Client Matter Number:

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

Trans Date	Index	Description of Service Rendered	Timekeeper	Hours	Fees	Sum	Circle	Action	TR
05/26/22	8846291	Phone call with John Hall regarding questions relating to accounting for McCloskey, Nicholson, and Emmons actions	Pham, Matt D.	0.60	248.40	248.40	WO	HD	TR
06/06/22	8882639	Confer with Mike Farrell regarding outstanding tasks in McCloskey, Hopen, Nicholson disgorgement actions	Pham, Matt D.	0.90	372.60	621.00	WO	HD	TR
06/28/22	8883065	Email correspondence with Judge MacKinnon's courtroom deputy regarding mandatory settlement conferences in Emmons, Nicholson, and Hopen matters	Pham, Matt D.	0.20	82.80	703.80	WO	HD	TR

Disbursements for Matter 378224.00009 (Third Party Claims & Recoveries)

Trans Date	Index	Type	Quantity	Amt	Circle	Action	TR
04/07/22	2761234	DCSRCH – Document Search - - PACER - 1/22 - 3/22 Usage	0.00	15.00	WO	HD	TR

Proforma Summary

Timekeeper Number	Timekeeper	Hours	Rate	Amounts
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08/03/22 17:15:12 PROFORMA STATEMENT FOR MATTER 378224.00009 (Winkler, Geoff/Receiver for Essex Capita) (Third Party Claims & Recoveries)

Proforma Summary

Timekeeper

Number	Timekeeper	Hours	Rate	Amounts
002510	Pham, Matt D.	1.70	414.00	703.80
		<u>1.70</u>		\$703.80
Subtotal Fees				\$703.80
Discount				0.00
Total Fees				703.80
Total Disbursements				15.00

Attorney Billing Instructions

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

Billing Instructions

expires 6/30/2023: 10% off standard rates (automatic)

Account Summary – As Of 08/03/22

	Fiscal YTD			Calendar YTD			LTD		
	Total	Fees	Disb.	Total	Fees	Disb.	Total	Fees	Disbursements
Worked	0.00	0.00	0.00	10,864.50	10,849.50	15.00	31,224.75	31,209.75	15.00
Unbilled Adj	0.00	0.00	0.00	0.00	0.00	0.00	1,653.75	1,653.75	0.00
Billed	0.00	0.00	0.00	9,709.20	9,709.20	0.00	18,706.50	18,706.50	0.00
Collected	0.00	0.00	0.00	9,709.20	9,709.20	0.00	18,706.50	18,706.50	0.00
AR Write Off	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00
WIP Balance	10,864.50	10,849.50	15.00						
AR Balance	0.00	0.00	0.00						
Unalloc Payment	0.00								
Client Trust Balance	0.00								

08/03/22 17:15:12 PROFORMA STATEMENT FOR MATTER 378224.00009 (Winkler, Geoff/Receiver for Essex Capita) (Third Party Claims & Recoveries)

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

08/03/22 17:15:13 PROFORMA STATEMENT FOR MATTER 378224.00011 (Winkler, Geoff/Receiver for Essex Capita) (CVL Asset Recovery & Litigation)

Preliminary Billing Form

Billing Atty: 001842 - Del Castillo, Matter #: 378224.00011 Client Name: Winkler, Geoff/Receiver for Essex Capita
 Joshua
 Date of Last Billing: 01/11/22 Matter Name: CVL Asset Recovery & Litigation
 Proforma Number: 1175209
 Client/Matter Joint Group # 378224-1 Client Matter Number:

Fees for Matter 378224.00011.(CVL Asset Recovery & Litigation)

Trans Date	Index	Description of Service Rendered	Timekeeper	Hours	Fees	Sum	Circle	Action		
04/13/22	8810320	Various conferences and analysis re: potential global settlement and strategy re: same.	Farrell, Michael	0.70	538.65	538.65	WO	HD	TR	_____
04/14/22	8810449	Conferences and analysis re: settlement issues and strategy.	Farrell, Michael	0.40	307.80	846.45	WO	HD	TR	_____
04/20/22	8811608	Conferences and analysis re: potential global settlement and strategy/terms for same.	Farrell, Michael	0.40	307.80	1,154.25	WO	HD	TR	_____
04/21/22	8813611	Various conferences and analysis re: settlement issues and strategy.	Farrell, Michael	0.90	692.55	1,846.80	WO	HD	TR	_____
04/26/22	8814032	Various conferences with counsel and client re: settlement issues, timing and strategy.	Farrell, Michael	1.20	923.40	2,770.20	WO	HD	TR	_____
04/28/22	8809489	Various conferences and analysis re: settlement issues, terms and strategy.	Farrell, Michael	0.60	461.70	3,231.90	WO	HD	TR	_____
06/08/22	8878402	Telephone conferences and analysis re: CVL settlement structure and potential issues with same (.3); review and analysis	Farrell, Michael	1.20	923.40	4,155.30	WO	HD	TR	_____

08/03/22 17:15:13 PROFORMA STATEMENT FOR MATTER 378224.00011 (Winkler, Geoff/Receiver for Essex Capita) (CVL Asset Recovery & Litigation)

Fees for Matter 378224.00011.(CVL Asset Recovery & Litigation)

Trans Date	Index	Description of Service Rendered	Timekeeper	Hours	Fees	Sum	Circle	Action
		of draft agreement and outlined potential issues (.6); further telephone conference re: issues and strategy to address same (.3).						
06/29/22	8882772	Conference, analysis and review of e-mails re: settlement issues and strategy.	Farrell, Michael	0.30	230.85	4,386.15	WO	HD TR
06/30/22	8883089	Conferences, analysis and exchange of e-mails re: settlement issues and strategy.	Farrell, Michael	0.50	384.75	4,770.90	WO	HD TR

Proforma Summary

Timekeeper Number	Timekeeper	Hours	Rate	Amounts
000739	Farrell, Michael	6.20	769.50	4,770.90
		6.20		\$4,770.90
	Subtotal Fees			\$4,770.90
	Discount			0.00
	Total Fees			4,770.90
	Total Disbursements			0.00

Attorney Billing Instructions

- BILL ALL
- BILL FEES ONLY
- BILL COST ONLY
- Hold
- Write Off
- Transfer All

Billing Instructions

expires 6/30/2023: 10% off standard rates (automatic)

Account Summary – As Of 08/03/22

Fiscal YTD			Calendar YTD			LTD		
Total	Fees	Disb.	Total	Fees	Disb.	Total	Fees	Disbursements

08/03/22 17:15:13 PROFORMA STATEMENT FOR MATTER 378224.00011 (Winkler, Geoff/Receiver for Essex Capita) (CVL Asset Recovery & Litigation)

Worked	0.00	0.00	0.00	5,930.10	5,930.10	0.00	7,702.20	7,702.20	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	480.15	480.15	0.00	1,772.10	1,772.10	0.00
Collected	0.00	0.00	0.00	480.15	480.15	0.00	1,772.10	1,772.10	0.00
AR Write Off	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00
	Total	Fees	Costs						
WIP Balance	5,930.10	5,930.10	0.00						
AR Balance	0.00	0.00	0.00						
Unalloc Payment	0.00								
Client Trust Balance	0.00								

Billing Address

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

08/03/22 17:15:14 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: 04/29/22 Matter Name: CVL Litigation (Winlker v. 915 Elm Avenu
 Proforma Number: 1175209
 Client/Matter Joint Group # 378224-1 Client Matter Number:

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		
04/01/22	8813084	Continue drafting joint summary judgment brief - response to CVL's argument re consideration (1.5); Continue drafting joint summary judgment brief - response to CVL's argument re unjust enrichment (0.7); Continue drafting joint summary judgment brief - response to CVL's argument re Second CVL Note (1.4); Continue drafting joint statement of facts - responses to CVL's asserted undisputed facts (1.5)	Pham, Matt D.	5.10	2,111.40	2,111.40	WO	HD	TR	_____
04/03/22	8813085	Continue drafting joint statement of facts - responses to CVL's asserted undisputed facts (2.5); Continue drafting joint statement of facts - Receiver's supplemental undisputed facts (2.7); Continue drafting joint statement of facts - responses to CVL's asserted undisputed facts (1.6); Revise joint summary judgment brief - argument to CVL's argument re unjust enrichment and Second CVL Note (1.4)	Pham, Matt D.	8.20	3,394.80	5,506.20	WO	HD	TR	_____

08/03/22 17:15:14 PROFORMA STATEMENT FOR MATTER 378224.00013 (Winkler, Geoff/Receiver for Essex Capita) (CVL Litigation (Winlker v. 915 Elm Avenu)

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		
04/04/22	8783854	Confer with counsel regarding summary judgment and prospective settlement status (0.6).	Del Castillo, Joshua	0.60	386.10	5,892.30	WO	HD	TR	_____
04/04/22	8813087	Continue drafting joint summary judgment brief - response to CVL's argument re capital call (1.9); Continue drafting joint summary judgment brief - responses to various CVL's arguments (1.9); Revise joint statement of facts - responses to CVL's asserted undisputed facts (0.6); Continue drafting joint statement of facts - responses to CVL's asserted undisputed facts (1.8); Continue drafting joint statement of facts - Receiver's supplemental undisputed facts (1.9); Revise and finalize Winkler declaration, del Castillo declaration, and RJN (0.7); Revise and finalize joint evidentiary appendix and joint appendix of facts (1.5).	Pham, Matt D.	10.30	4,264.20	10,156.50	WO	HD	TR	_____
04/04/22	8815636	Communications with team regarding MSJ.	Lloyd, Kevin	0.70	469.35	10,625.85	WO	HD	TR	_____
04/05/22	8784818	Confer with counsel regarding motion for summary judgment evidentiary and trial scheduling issues (1.1).	Del Castillo, Joshua	1.10	707.85	11,333.70	WO	HD	TR	_____
04/05/22	8813109	Review CVL's portions of joint summary judgment brief, joint appendix of facts (0.9); Revise and update joint summary judgment brief (0.8); Review CVL's additional exhibits for joint evidentiary appendix (0.4); Compile Receiver's and CVL's exhibits; update and finalize joint evidentiary appendix (1.6); Review CVL's portions of joint appendix of	Pham, Matt D.	6.30	2,608.20	13,941.90	WO	HD	TR	_____

08/03/22 17:15:14 PROFORMA STATEMENT FOR MATTER 378224.00013 (Winkler, Geoff/Receiver for Essex Capita) (CVL Litigation (Winlker v. 915 Elm Avenu)

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		
		facts (0.3); Update joint appendix of facts, incorporating CVL's portions (0.9); Update joint summary judgment brief, incorporating CVL's portions (1.4)								
04/05/22	8815664	Emails with team regarding MSJ.	Lloyd, Kevin	0.20	134.10	14,076.00	WO	HD	TR	_____
04/05/22	8815665	Emails with opposing counsel regarding MSJ.	Lloyd, Kevin	0.50	335.25	14,411.25	WO	HD	TR	_____
04/05/22	8815668	Communications with team regarding MSJ.	Lloyd, Kevin	0.40	268.20	14,679.45	WO	HD	TR	_____
04/06/22	8785996	Emails and teleconferences with counsel regarding summary judgment, trial, and prospective settlement issues (1.5).	Del Castillo, Joshua	1.50	965.25	15,644.70	WO	HD	TR	_____
04/06/22	8813120	Confer with Josh del Castillo and Kevin Lloyd regarding trial planning and settlement strategy (0.3); Confer with Josh del Castillo regarding trial preparation (0.2)	Pham, Matt D.	0.50	207.00	15,851.70	WO	HD	TR	_____
04/07/22	8815648	Communications with team regarding MSJ.	Lloyd, Kevin	0.30	201.15	16,052.85	WO	HD	TR	_____
04/07/22	8815649	Communications with team regarding settlement.	Lloyd, Kevin	0.80	536.40	16,589.25	WO	HD	TR	_____
04/08/22	8789311	Review scheduling order and emails and teleconferences regarding trial preparation and scheduling matters (1.2).	Del Castillo, Joshua	1.20	772.20	17,361.45	WO	HD	TR	_____
04/11/22	8789711	Teleconference and emails with counsel regarding motion for summary judgment	Del Castillo, Joshua	2.00	1,287.00	18,648.45	WO	HD	TR	_____

08/03/22 17:15:14 PROFORMA STATEMENT FOR MATTER 378224.00013 (Winkler, Geoff/Receiver for Essex Capita) (CVL Litigation (Winlker v. 915 Elm Avenu)

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		
		filing and prospective alternative settlement proposal (1.3); review filed motion for summary judgment materials (0.7).								
04/11/22	8812154	Communications with team regarding summary judgment.	Lloyd, Kevin	0.40	268.20	18,916.65	WO	HD	TR	_____
04/11/22	8812156	Review filings.	Lloyd, Kevin	0.50	335.25	19,251.90	WO	HD	TR	_____
04/11/22	8813124	Update joint appendix of facts with pin cites (1.6); Update joint summary judgment brief with pin cites (1.2); Revise and finalize notice and motion for summary judgment, request for judicial notice, and proposed judgment (0.9)	Pham, Matt D.	3.70	1,531.80	20,783.70	WO	HD	TR	_____
04/12/22	8790980	Review notice of filer deficiencies in connection with motion for summary judgment and confer with counsel regarding same (0.1); review motion for summary judgment papers and confer regarding litigation and settlement strategy (1.2).	Del Castillo, Joshua	1.20	772.20	21,555.90	WO	HD	TR	_____
04/12/22	8812148	Communications with team regarding settlement and summary judgment.	Lloyd, Kevin	0.40	268.20	21,824.10	WO	HD	TR	_____
04/13/22	8792205	Confer with counsel regarding prospective settlement (0.3).	Del Castillo, Joshua	0.30	193.05	22,017.15	WO	HD	TR	_____
04/13/22	8812140	Communications with team regarding settlement and summary judgment brief.	Lloyd, Kevin	0.50	335.25	22,352.40	WO	HD	TR	_____
04/14/22	8793079	Emails with counsel regarding prospective settlement and related matters (0.3);	Del Castillo, Joshua	0.80	514.80	22,867.20	WO	HD	TR	_____

08/03/22 17:15:14 PROFORMA STATEMENT FOR MATTER 378224.00013 (Winkler, Geoff/Receiver for Essex Capita) (CVL Litigation (Winlker v. 915 Elm Avenu)

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		
		teleconferences regarding same (0.5).								
04/14/22	8812130	Emails with team.	Lloyd, Kevin	0.40	268.20	23,135.40	WO	HD	TR	_____
04/14/22	8812131	Prepare for call.	Lloyd, Kevin	0.30	201.15	23,336.55	WO	HD	TR	_____
04/14/22	8812132	Call with Receiver.	Lloyd, Kevin	0.50	335.25	23,671.80	WO	HD	TR	_____
04/14/22	8812134	Meeting with M. Pham regarding trial preparation.	Lloyd, Kevin	0.50	335.25	24,007.05	WO	HD	TR	_____
04/14/22	8813164	Confer with Kevin Lloyd regarding trial preparation	Pham, Matt D.	0.30	124.20	24,131.25	WO	HD	TR	_____
04/15/22	8794306	Confer with counsel regarding reply briefing in connection with motion for summary judgment and attention to case calendar matters (1.2).	Del Castillo, Joshua	1.20	772.20	24,903.45	WO	HD	TR	_____
04/15/22	8812122	Emails with team regarding pretrial schedule.	Lloyd, Kevin	0.30	201.15	25,104.60	WO	HD	TR	_____
04/15/22	8812124	Review scheduling order.	Lloyd, Kevin	0.40	268.20	25,372.80	WO	HD	TR	_____
04/15/22	8812125	Review materials for pretrial documents.	Lloyd, Kevin	3.10	2,078.55	27,451.35	WO	HD	TR	_____
04/15/22	8813182	Review and analyze court's pretrial procedures orders to determine outstanding trial tasks and deadlines	Pham, Matt D.	0.80	331.20	27,782.55	WO	HD	TR	_____

08/03/22 17:15:14 PROFORMA STATEMENT FOR MATTER 378224.00013 (Winkler, Geoff/Receiver for Essex Capita) (CVL Litigation (Winlker v. 915 Elm Avenu)

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			
04/18/22	8812116	Meeting with team regarding jury instructions.	Lloyd, Kevin	0.20	134.10	27,916.65	WO	HD	TR	_____
04/18/22	8812117	Emails with team.	Lloyd, Kevin	0.10	67.05	27,983.70	WO	HD	TR	_____
04/19/22	8797537	Confer with counsel regarding Reply ISO motion for summary judgment (0.5); attention to pretrial administrative matters with K. Lloyd (0.4).	Del Castillo, Joshua	0.90	579.15	28,562.85	WO	HD	TR	_____
04/19/22	8812107	Emails with team regarding jury instructions.	Lloyd, Kevin	0.30	201.15	28,764.00	WO	HD	TR	_____
04/19/22	8812108	Communications with team.	Lloyd, Kevin	0.30	201.15	28,965.15	WO	HD	TR	_____
04/20/22	8812100	Calls with team regarding litigation.	Lloyd, Kevin	0.20	134.10	29,099.25	WO	HD	TR	_____
04/21/22	8799916	Confer with counsel regarding trial administration and preparation issues (0.9); email to D. Cousineau regarding site visit request (0.1).	Del Castillo, Joshua	1.00	643.50	29,742.75	WO	HD	TR	_____
04/21/22	8812094	Call with Receiver.	Lloyd, Kevin	1.00	670.50	30,413.25	WO	HD	TR	_____
04/21/22	8812096	Emails with opposing counsel regarding inspection.	Lloyd, Kevin	0.10	67.05	30,480.30	WO	HD	TR	_____
04/21/22	8814868	Strategize research of remedies for promissory notes.	Jernigan, Alexandra R.	0.40	138.60	30,618.90	WO	HD	TR	_____

08/03/22 17:15:14 PROFORMA STATEMENT FOR MATTER 378224.00013 (Winkler, Geoff/Receiver for Essex Capita) (CVL Litigation (Winlker v. 915 Elm Avenu)

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		
04/22/22	8812067	Communications with team regarding reply briefing and jury instructions.	Lloyd, Kevin	0.40	268.20	30,887.10	WO	HD	TR	_____
04/22/22	8812068	Research and editing Jury instructions.	Lloyd, Kevin	0.70	469.35	31,356.45	WO	HD	TR	_____
04/22/22	8812069	Emails with opposing counsel regarding jury instructions.	Lloyd, Kevin	0.40	268.20	31,624.65	WO	HD	TR	_____
04/22/22	8813244	Review and analyze jury instructions and verdict forms	Pham, Matt D.	0.60	248.40	31,873.05	WO	HD	TR	_____
04/23/22	8812066	Emails with team regarding jury instructions.	Lloyd, Kevin	0.20	134.10	32,007.15	WO	HD	TR	_____
04/23/22	8813247	Review and analyze CVL's sections of joint summary judgment brief, joint appendix of facts (1.0); Prepare outline of arguments for supplemental memorandum (0.4); Begin drafting supplemental memorandum in support of summary judgment motion (2.6)	Pham, Matt D.	4.00	1,656.00	33,663.15	WO	HD	TR	_____
04/24/22	8813248	Continue drafting supplemental memorandum	Pham, Matt D.	1.10	455.40	34,118.55	WO	HD	TR	_____
04/25/22	8803934	Confer with K. Lloyd and prepare email to D. Zaro regarding prospective settlement (0.3).	Del Castillo, Joshua	0.30	193.05	34,311.60	WO	HD	TR	_____
04/25/22	8810574	Work with counsel as to analysis of the Reyner/CVL global settlement issues and strategy regarding negotiations.	Zaro, David	0.30	251.10	34,562.70	WO	HD	TR	_____
04/25/22	8813261	Continue drafting supplemental memorandum - argument re consideration	Pham, Matt D.	1.50	621.00	35,183.70	WO	HD	TR	_____

08/03/22 17:15:14 PROFORMA STATEMENT FOR MATTER 378224.00013 (Winkler, Geoff/Receiver for Essex Capita) (CVL Litigation (Winlker v. 915 Elm Avenu)

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		
04/26/22	8805055	Teleconferences and emails regarding trial administration and prospective settlement with counsel and opposing counsel; confer with counsel regarding same (1.3).	Del Castillo, Joshua	1.30	836.55	36,020.25	WO	HD	TR	_____
04/26/22	8810648	Work with counsel to address CVL settlement proposal and negotiations, advice related to settlement.	Zaro, David	0.40	334.80	36,355.05	WO	HD	TR	_____
04/26/22	8812088	Emails with opposing counsel.	Lloyd, Kevin	0.40	268.20	36,623.25	WO	HD	TR	_____
04/26/22	8812089	Call with opposing counsel.	Lloyd, Kevin	0.70	469.35	37,092.60	WO	HD	TR	_____
04/26/22	8812090	Call with Receiver.	Lloyd, Kevin	0.20	134.10	37,226.70	WO	HD	TR	_____
04/26/22	8813280	Continue drafting supplemental memorandum - argument re Reyner email (0.8); Phone call with CVL's counsel, Josh del Castillo, Kevin Lloyd regarding trial deadlines (0.2); Conitnue drafting supplemental memorandum - argument re damages (1.6); Continue drafting supplemental memorandum - argument re reconsideration (1.2); Continue drafting supplemental memorandum - argument re Reyner email (1.8)	Pham, Matt D.	5.60	2,318.40	39,545.10	WO	HD	TR	_____
04/27/22	8806780	Emails, teleconferences, and confer with counsel regarding prospective settlement and trial administration matters (3.1).	Del Castillo, Joshua	3.10	1,994.85	41,539.95	WO	HD	TR	_____

08/03/22 17:15:14 PROFORMA STATEMENT FOR MATTER 378224.00013 (Winkler, Geoff/Receiver for Essex Capita) (CVL Litigation (Winlker v. 915 Elm Avenu)

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		
04/27/22	8813290	Continue drafting supplemental memorandum - argument re damages (0.4); Continue drafting supplemental memorandum - argument re Reyner's email (2.5); Continue drafting supplemental memorandum - argument re consideration (1.9)	Pham, Matt D.	4.80	1,987.20	43,527.15	WO	HD	TR	_____
04/28/22	8808270	Emails and teleconferences with counsel and opposing counsel regarding tentative settlement (2.3); prepare draft stipulation and order in connection with same (0.9); teleconferences and emails with Receiver regarding same (0.5).	Del Castillo, Joshua	3.70	2,380.95	45,908.10	WO	HD	TR	_____
04/28/22	8810867	Evaluate terms of settlement, split of assets and advice regarding terms (.4). Call/email as to further questions, advice as to settlement terms (.2).	Zaro, David	0.60	502.20	46,410.30	WO	HD	TR	_____
04/28/22	8813301	Continue drafting supplemental memorandum - argument re Reyner's email (2.6); Continue drafting supplemental memorandum - argument re failure of consideration (1.9); Continue drafting supplemental memorandum - argument re damages (1.2); Draft list of relevant pretrial/trial dates and deadlines (0.1); Continue drafting supplemental memorandum - argument re consideration (1.0)	Pham, Matt D.	6.80	2,815.20	49,225.50	WO	HD	TR	_____
05/03/22	8816684	Review and respond to correspondence regarding settlement and preparation of settlement agreement (0.2); emails and teleconferences with counsel regarding	Del Castillo, Joshua	0.70	450.45	49,675.95	WO	HD	TR	_____

08/03/22 17:15:14 PROFORMA STATEMENT FOR MATTER 378224.00013 (Winkler, Geoff/Receiver for Essex Capita) (CVL Litigation (Winlker v. 915 Elm Avenu)

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		
		same (0.5).								
05/03/22	8850319	Emails with opposing counsel; Communications with team.	Lloyd, Kevin	0.50	335.25	50,011.20	WO	HD	TR	_____
05/04/22	8818902	Work with counsel as to the settlement terms and coordination of the negotiations, advice to Receiver counsel as to strategy.	Zaro, David	0.40	334.80	50,346.00	WO	HD	TR	_____
05/06/22	8820005	Review order taking MSJs under submission and emails and teleconferences with counsel regarding response to same in view of parties settlement-related stipulation (0.5).	Del Castillo, Joshua	0.50	321.75	50,667.75	WO	HD	TR	_____
05/06/22	8846160	Draft email to Judge Olguin's courtroom deputy regarding stipulation on extension of relevant dates and deadlines, notice of settlement	Pham, Matt D.	0.30	124.20	50,791.95	WO	HD	TR	_____
05/07/22	8821276	Review Court order regarding stipulation and attention to preparation of draft settlement and prepare outline for same (1.5).	Del Castillo, Joshua	1.50	965.25	51,757.20	WO	HD	TR	_____
05/09/22	8821628	Correspondence and discussions with counsel and prepare draft settlement agreement (3.0).	Del Castillo, Joshua	3.00	1,930.50	53,687.70	WO	HD	TR	_____
05/09/22	8836455	Emails with opposing counsel; Review order; Review draft agreement.	Lloyd, Kevin	1.40	938.70	54,626.40	WO	HD	TR	_____
05/10/22	8822832	Emails with opposing counsel regarding settlement issues and review and comment on stipulation (0.5).	Del Castillo, Joshua	0.50	321.75	54,948.15	WO	HD	TR	_____

08/03/22 17:15:14 PROFORMA STATEMENT FOR MATTER 378224.00013 (Winkler, Geoff/Receiver for Essex Capita) (CVL Litigation (Winlker v. 915 Elm Avenu)

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		
05/13/22	8826525	Review order on stipulation (0.1); confer with counsel regarding draft settlement agreement (0.2).	Del Castillo, Joshua	0.30	193.05	55,141.20	WO	HD	TR	_____
05/13/22	8837251	Emails with team; Review stipulation.	Lloyd, Kevin	0.30	201.15	55,342.35	WO	HD	TR	_____
05/16/22	8827996	Review and revise draft settlement (1.6); analysis of issues regarding business/real estate split provisions of settlement and correspondence regarding same (1.0); review and respond to inquiry from D. Cousineau regarding same (0.1).	Del Castillo, Joshua	2.70	1,737.45	57,079.80	WO	HD	TR	_____
05/16/22	8846222	Review and analyze current draft of settlement agreement	Pham, Matt D.	0.50	207.00	57,286.80	WO	HD	TR	_____
05/17/22	8829800	Confer with counsel regarding draft settlement (0.3).	Del Castillo, Joshua	0.30	193.05	57,479.85	WO	HD	TR	_____
05/18/22	8831109	Emails regarding draft settlement agreement (0.2).	Del Castillo, Joshua	0.20	128.70	57,608.55	WO	HD	TR	_____
05/19/22	8832400	Review notes and attention to revisions to draft settlement agreement; emails regarding same (0.9).	Del Castillo, Joshua	0.90	579.15	58,187.70	WO	HD	TR	_____
05/20/22	8833569	Review and respond to correspondence regarding draft settlement agreement (0.4); review correspondence and court scheduling order and confer with D. Cousineau (0.3).	Del Castillo, Joshua	0.70	450.45	58,638.15	WO	HD	TR	_____
05/23/22	8835987	Review and revise settlement agreement (0.9); emails and teleconferences regarding same (1.1).	Del Castillo, Joshua	2.00	1,287.00	59,925.15	WO	HD	TR	_____

08/03/22 17:15:14 PROFORMA STATEMENT FOR MATTER 378224.00013 (Winkler, Geoff/Receiver for Essex Capita) (CVL Litigation (Winlker v. 915 Elm Avenu)

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		
05/23/22	8839071	Work on the issues related to settlement agreement and analysis of terms, operating agreement and future management issues regarding real property (1.2). Meeting with counsel to address the settlement terms (.4).	Zaro, David	1.60	1,339.20	61,264.35	WO	HD	TR	_____
05/24/22	8837940	Review correspondence from D. Cousineau in connection with drafting settlement agreement (0.2); prepare notes and emails with D. Zaro regarding same (0.5); prepare additional revisions to draft settlement agreement (0.3).	Del Castillo, Joshua	1.00	643.50	61,907.85	WO	HD	TR	_____
05/24/22	8847170	Communications with team.	Lloyd, Kevin	0.20	134.10	62,041.95	WO	HD	TR	_____
05/25/22	8839513	Confer with counsel and review and respond to correspondence regarding proposed revisions to settlement agreement (1.1).	Del Castillo, Joshua	1.10	707.85	62,749.80	WO	HD	TR	_____
05/25/22	8840776	Email/call with Receiver related to the draft of CVL settlement, address real estate and lender issues (.4). Revise draft of settlement agreement, address new LLC issues and advice to counsel (.5).	Zaro, David	0.90	753.30	63,503.10	WO	HD	TR	_____
05/26/22	8840712	Prepare additional revisions to draft settlement agreement and confer with counsel regarding same (0.7); emails with Receiver's office and opposing counsel regarding same (0.3).	Del Castillo, Joshua	1.00	643.50	64,146.60	WO	HD	TR	_____

08/03/22 17:15:14 PROFORMA STATEMENT FOR MATTER 378224.00013 (Winkler, Geoff/Receiver for Essex Capita) (CVL Litigation (Winlker v. 915 Elm Avenu)

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		
05/27/22	8842171	Review and respond to correspondence from D. Cousineau regarding anticipated settlement and site visit (0.2); emails and teleconferences regarding same (0.5).	Del Castillo, Joshua	0.70	450.45	64,597.05	WO	HD	TR	_____
05/31/22	8847394	Emails and teleconferences regarding pending settlement, settlement agreement, and Receiver's proposed CVL site visit (0.9).	Del Castillo, Joshua	0.90	579.15	65,176.20	WO	HD	TR	_____
05/31/22	8848570	Several calls/emails with counsel related to the CVL settlement.	Zaro, David	0.30	251.10	65,427.30	WO	HD	TR	_____
06/01/22	8850347	Emails and teleconferences regarding settlement (0.8).	Del Castillo, Joshua	0.80	514.80	65,942.10	WO	HD	TR	_____
06/02/22	8851703	Emails and teleconferences regarding prospective settlement and draft settlement agreement (0.5).	Del Castillo, Joshua	0.50	321.75	66,263.85	WO	HD	TR	_____
06/07/22	8855612	Review and respond to correspondence regarding CVL settlement (0.2).	Del Castillo, Joshua	0.20	128.70	66,392.55	WO	HD	TR	_____
06/08/22	8856673	Teleconferences with counsel regarding settlement agreement (0.5).	Del Castillo, Joshua	0.50	321.75	66,714.30	WO	HD	TR	_____
06/10/22	8859119	Additional review of proposed revisions to settlement agreement and emails regarding same (0.6).	Del Castillo, Joshua	0.60	386.10	67,100.40	WO	HD	TR	_____
06/13/22	8860694	Teleconference with D. Zaro regarding Reyner proposed revisions to CVL settlement agreement and review documents in connection with same (0.3); teleconference with D. Cousineau regarding same (0.6); prepare further revisions to	Del Castillo, Joshua	1.40	900.90	68,001.30	WO	HD	TR	_____

08/03/22 17:15:14 PROFORMA STATEMENT FOR MATTER 378224.00013 (Winkler, Geoff/Receiver for Essex Capita) (CVL Litigation (Winlker v. 915 Elm Avenu)

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			
		settlement agreement (0.5).								
06/13/22	8863811	Follow-up advice as to legal issues related to CVL settlement, revisions by Reyner and follow-up (.4). Further review, legal analysis of CVL terms, advice to counsel (.3).	Zaro, David	0.70	585.90	68,587.20	WO	HD	TR	_____
06/14/22	8864890	Revise/review draft of the settlement to address the new operating agreement, the New LLC and related issues, then email to counsel.	Zaro, David	0.70	585.90	69,173.10	WO	HD	TR	_____
06/15/22	8863590	Emails and teleconferences with D. Zaro and D. Cousineau regarding status of settlement and scheduling site visit (0.8); emails with Receiver regarding same (0.2); attention to revisions to settlement agreement (0.6).	Del Castillo, Joshua	1.60	1,029.60	70,202.70	WO	HD	TR	_____
06/16/22	8864808	Confer with D. Zaro regarding revisions to settlement agreement, make revisions, and transmit additional revisions and comments to opposing counsel (0.9).	Del Castillo, Joshua	0.90	579.15	70,781.85	WO	HD	TR	_____
06/16/22	8867720	Work on further issues related to operating agreement/terms of settlement (.6). Revise draft agreement and exhibits, advice to counsel related to negotiations (.8).	Zaro, David	1.40	1,171.80	71,953.65	WO	HD	TR	_____
06/17/22	8865768	Review Cousineau proposed revisions to settlement agreement and confer regarding same (0.5); teleconference with D. Cousineau regarding same (0.5); prepare additional revisions (0.6).	Del Castillo, Joshua	1.60	1,029.60	72,983.25	WO	HD	TR	_____

08/03/22 17:15:14 PROFORMA STATEMENT FOR MATTER 378224.00013 (Winkler, Geoff/Receiver for Essex Capita) (CVL Litigation (Winlker v. 915 Elm Avenu)

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		
06/17/22	8867737	Work on further revisions to the draft of the CVL settlement and meeting with counsel to advise as to terms (.8). Several emails/further call to address revised terms (.3).	Zaro, David	1.10	920.70	73,903.95	WO	HD	TR	_____
06/20/22	8867726	Confer with counsel regarding status of CVL settlement agreement and associated deadlines (0.5).	Del Castillo, Joshua	0.50	321.75	74,225.70	WO	HD	TR	_____
06/22/22	8870254	Review CVL proposed revisions to settlement, confer with D. Zaro, and teleconference with D. Cousineau regarding same (1.5).	Del Castillo, Joshua	1.50	965.25	75,190.95	WO	HD	TR	_____
06/22/22	8873209	Analysis of redline from CVL as to the settlement and operating agreement, receiver response/issues as to scope-authority regarding order and advice to counsel.	Zaro, David	0.70	585.90	75,776.85	WO	HD	TR	_____
06/22/22	8882951	Confer with Josh del Castillo and Kevin Lloyd regarding status of CVL settlement (0.3); Review and analyze latest draft of summary judgment supplemental memorandum to determine extent of additional work needed (0.6)	Pham, Matt D.	0.90	372.60	76,149.45	WO	HD	TR	_____
06/23/22	8872230	Confer with D. Zaro regarding Reyner proposed revisions to settlement agreement, prepare alternative proposal and transmit to D. Cousineau and confer regarding same (0.6); teleconference with D. Cousineau regarding motion for summary judgment deadlines and his client's requested extension, and review,	Del Castillo, Joshua	1.50	965.25	77,114.70	WO	HD	TR	_____

08/03/22 17:15:14 PROFORMA STATEMENT FOR MATTER 378224.00013 (Winkler, Geoff/Receiver for Essex Capita) (CVL Litigation (Winkler v. 915 Elm Avenu)

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

Trans Date	Index	Description of Service Rendered	Timekeeper	Hours	Fees	Sum	Circle	Action		
		revise, and provide documents in connection with same (0.9).								
06/26/22	8879831	Emails with opposing counsel.	Lloyd, Kevin	0.10	67.05	77,181.75	WO	HD	TR	_____
06/27/22	8875147	Teleconferences and emails with D. Cousineau regarding settlement agreement revisions (0.7); review proposed language and attention to issues regarding same (0.3).	Del Castillo, Joshua	1.00	643.50	77,825.25	WO	HD	TR	_____
06/27/22	8879835	Communications with opposing counsel and team re settlement agreement.	Lloyd, Kevin	0.30	201.15	78,026.40	WO	HD	TR	_____
06/29/22	8877935	Prepare revisions to settlement agreement and forward to Receiver for approval of same; confer regarding same (0.5).	Del Castillo, Joshua	0.50	321.75	78,348.15	WO	HD	TR	_____

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

Trans Date	Index	Type	Quantity	Amt	Circle	Action		
04/04/22	2763804	RSRCH – WestLaw	0.00	43.00	WO	HD	TR	_____
04/11/22	2760084	BW – Duplication - Black & White Copies	671.00	127.49	WO	HD	TR	_____
04/11/22	2761645	MSNGR – Nationwide Legal, LLC - United States District Court Central District of California, Deliver Courtesy	0.00	114.70	WO	HD	TR	_____
04/12/22	2760192	BW – Duplication - Black & White Copies	671.00	127.49	WO	HD	TR	_____
04/12/22	2767349	MSNGR – Messenger - Nationwide Legal LLC - USDC-CENTRAL	0.00	39.50	WO	HD	TR	_____

Proforma Summary

08/03/22 17:15:14 PROFORMA STATEMENT FOR MATTER 378224.00013 (Winkler, Geoff/Receiver for Essex Capita) (CVL Litigation (Winlker v. 915 Elm Avenu)

Timekeeper

Number	Timekeeper	Hours	Rate	Amounts
000313	Zaro, David	9.10	837.00	7,616.70
001842	Del Castillo, Joshua	51.30	643.50	33,011.55
002493	Lloyd, Kevin	18.20	670.50	12,203.10
002510	Pham, Matt D.	61.30	414.00	25,378.20
002533	Jernigan, Alexandra R.	0.40	346.50	138.60
		140.30		\$78,348.15
Subtotal Fees				\$78,348.15
Discount				0.00
Total Fees				78,348.15
Total Disbursements				452.18

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 6/30/2023: 10% off standard rates (automatic)

Account Summary – As Of 08/03/22

	Fiscal YTD			Calendar YTD			LTD		
	Total	Fees	Disb.	Total	Fees	Disb.	Total	Fees	Disbursements
Worked	3,745.80	3,745.80	0.00	216,307.84	215,809.20	498.64	516,504.21	498,138.30	18,365.91
Unbilled Adj	0.00	0.00	0.00	0.00	0.00	0.00	11,796.12	11,796.12	0.00
Billed	0.00	0.00	0.00	248,049.53	230,227.47	17,822.06	273,004.02	273,004.02	17,867.27
Collected	0.00	0.00	0.00	248,049.53	230,227.47	17,822.06	290,871.29	273,004.02	17,867.27
AR Write Off	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00
WIP	217,370.39	215,809.20	1,561.19						
Balance									
AR Balance	0.00	0.00	0.00						
Unalloc Payment	0.00								

08/03/22 17:15:14 PROFORMA STATEMENT FOR MATTER 378224.00013 (Winkler, Geoff/Receiver for Essex Capita) (CVL Litigation (Winkler v. 915 Elm Avenu)

Client Trust **0.00**
Balance

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

08/03/22 17:15:16 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: 04/29/22 Matter Name: Fazio Litigation
 Proforma Number: 1175209
 Client/Matter Joint Group # 378224-1 Client Matter Number:

Fees for Matter 378224.00014.(Fazio Litigation)

Trans Date	Index	Description of Service Rendered	Timekeeper	Hours	Fees	Sum	Circle	Action		
04/01/22	8783555	Emails regarding settlement and court approval (0.5); legal analysis of issue presented in connection with same (0.3).	Del Castillo, Joshua	0.80	514.80	514.80	WO	HD	TR	_____
04/04/22	8783824	Legal analysis and commence preparation of Receiver's application for permission to file under seal (1.1).	Del Castillo, Joshua	1.10	707.85	1,222.65	WO	HD	TR	_____
04/08/22	8789309	Additional legal analysis in connection with motion to seal and continue preparation of materials for same (1.5).	Del Castillo, Joshua	1.50	965.25	2,187.90	WO	HD	TR	_____
04/11/22	8789812	Complete draft application to file under seal and attention to motion to approve settlement (0.8); review and respond to emails regarding settlement status (0.3).	Del Castillo, Joshua	1.10	707.85	2,895.75	WO	HD	TR	_____
04/13/22	8792228	Confer regarding under seal filing, prepare draft Receiver declaration, and attention to revised motion to approve settlement (1.5).	Del Castillo, Joshua	1.50	965.25	3,861.00	WO	HD	TR	_____
04/14/22	8793078	Emails with counsel regarding motion to approve settlement agreement (0.5).	Del Castillo, Joshua	0.50	321.75	4,182.75	WO	HD	TR	_____

08/03/22 17:15:16 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		
04/18/22	8795755	Review documents and notes and prepare revised and updated motion to approve settlement (2.9).	Del Castillo, Joshua	2.90	1,866.15	6,048.90	WO	HD	TR	_____
04/24/22	8802299	Emails regarding status of Fazio counsel review of settlement motion papers (0.2).	Del Castillo, Joshua	0.20	128.70	6,177.60	WO	HD	TR	_____
04/25/22	8803882	Prepare declaration in support of application to file under seal (0.6).	Del Castillo, Joshua	0.60	386.10	6,563.70	WO	HD	TR	_____
04/27/22	8806788	Review and revise settlement motion materials (0.7).	Del Castillo, Joshua	0.70	450.45	7,014.15	WO	HD	TR	_____
04/28/22	8808276	Emails regarding status of settlement motion materials and confer regarding same (0.5).	Del Castillo, Joshua	0.50	321.75	7,335.90	WO	HD	TR	_____
04/29/22	8811048	Review and respond to correspondence from A. Beral regarding settlement approval papers and confer with counsel regarding same (0.4); commence revisions to motions (0.4).	Del Castillo, Joshua	0.80	514.80	7,850.70	WO	HD	TR	_____
05/01/22	8815332	Review and revise settlement motion materials and correspondence regarding same (1.2).	Del Castillo, Joshua	1.20	772.20	8,622.90	WO	HD	TR	_____
05/02/22	8815587	Confer internally and finalize revisions to and assemble packed of settlement motion materials (1.0).	Del Castillo, Joshua	1.00	643.50	9,266.40	WO	HD	TR	_____
05/03/22	8816512	Finalize settlement related materials, confer with Receiver's office, and prepare for filing (0.7).	Del Castillo, Joshua	0.70	450.45	9,716.85	WO	HD	TR	_____

08/03/22 17:15:16 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		
05/05/22	8818924	Review order approving filing under seal and confer regarding filing settlement motion under seal (0.5); finalize settlement motion materials for filing and confer regarding same (0.6).	Del Castillo, Joshua	1.10	707.85	10,424.70	WO	HD	TR	_____
05/11/22	8824229	Emails and teleconference regarding pending settlement motion (0.2).	Del Castillo, Joshua	0.20	128.70	10,553.40	WO	HD	TR	_____
06/02/22	8851763	Review docket, confirm no opposition, and confer with Receiver's office regarding prospective notice of non-opposition (0.3).	Del Castillo, Joshua	0.30	193.05	10,746.45	WO	HD	TR	_____
06/05/22	8853483	Prepare notice of non-receipt of opposition and prepare for filing (0.5).	Del Castillo, Joshua	0.50	321.75	11,068.20	WO	HD	TR	_____
06/06/22	8853884	Review order approving settlement and emails with Receiver's office and opposing counsel regarding same (0.5).	Del Castillo, Joshua	0.50	321.75	11,389.95	WO	HD	TR	_____
06/07/22	8855390	Review and respond to correspondence regarding pending settlement payment (0.2).	Del Castillo, Joshua	0.20	128.70	11,518.65	WO	HD	TR	_____
06/08/22	8856630	Emails with Receiver's office and opposing counsel regarding settlement payment and anticipated dismissal of action (0.3).	Del Castillo, Joshua	0.30	193.05	11,711.70	WO	HD	TR	_____
06/09/22	8857560	Review and respond to correspondence regarding stipulation to dismiss action, with prejudice (0.2).	Del Castillo, Joshua	0.20	128.70	11,840.40	WO	HD	TR	_____
06/09/22	8882681	Draft stipulation and proposed order regarding dismissal of disgorgement action	Pham, Matt D.	0.40	165.60	12,006.00	WO	HD	TR	_____

08/03/22 17:15:16 PROFORMA STATEMENT FOR MATTER 378224.00014 (Winkler, Geoff/Receiver for Essex Capita) (Fazio Litigation)

Disbursements for Matter 378224.00014 (Fazio Litigation)

Trans Date	Index	Type	Quantity	Amt	WO	HD	TR	
05/03/22	2766738	MSNGR – Nationwide Legal, LLC - USDC-CENTRAL, Deliver Courtesy	0.00	17.75	WO	HD	TR	_____
05/09/22	2766739	MSNGR – Nationwide Legal, LLC - USDC-CENTRAL, Deliver Courtesy	0.00	17.75	WO	HD	TR	_____

Proforma Summary

Timekeeper

Number	Timekeeper	Hours	Rate	Amounts
001842	Del Castillo, Joshua	18.40	643.50	11,840.40
002510	Pham, Matt D.	0.40	414.00	165.60
		<u>18.80</u>		\$12,006.00
Subtotal Fees				\$12,006.00
Discount				0.00
Total Fees				12,006.00
Total Disbursements				35.50

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 6/30/2023: 10% off standard rates (automatic)

Account Summary – As Of 08/03/22

	Fiscal YTD			Calendar YTD			LTD		
	Total	Fees	Disb.	Total	Fees	Disb.	Total	Fees	Disbursements
Worked	0.00	0.00	0.00	78,772.40	78,326.10	446.30	130,856.45	130,396.95	459.50
Unbilled Adj	0.00	0.00	0.00	0.00	0.00	0.00	1,152.00	1,152.00	0.00
Billed	0.00	0.00	0.00	41,437.05	41,436.45	0.60	50,918.85	50,918.85	13.20
Collected	0.00	0.00	0.00	41,437.05	41,436.45	0.60	50,932.05	50,918.85	13.20
AR Write Off	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00

08/03/22 17:15:16 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 Balance</i>	<i>78,772.40</i>	<i>78,326.10</i>	<i>446.30</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>		

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

08/03/22 17:15:17 PROFORMA STATEMENT FOR MATTER 378224.00016 (Winkler, Geoff/Receiver for Essex Capita) (Siemens Litigation)

Preliminary Billing Form

Billing Atty: 001842 - Del Castillo, Matter #: 378224.00016 Client Name: Winkler, Geoff/Receiver for Essex Capita
 Joshua
 Date of Last Billing: 04/29/22 Matter Name: Siemens Litigation
 Proforma Number: 1175209
 Client/Matter Joint Group # 378224-1 Client Matter Number:

Fees for Matter 378224.00016.(Siemens Litigation)

Trans Date	Index	Description of Service Rendered	Timekeeper	Hours	Fees	Sum	Circle	Action		
04/04/22	8783692	Teleconference with opposing counsel and finalize draft settlement agreement (0.7); transmit to counsel regarding same (0.1).	Del Castillo, Joshua	0.80	514.80	514.80	WO	HD	TR	_____
05/02/22	8815560	Emails and teleconferences regarding settlement status and prepare form stipulation and order to approve settlement (0.7).	Del Castillo, Joshua	0.70	450.45	965.25	WO	HD	TR	_____
05/04/22	8817699	Confer with J. Hudgens regarding executed settlement agreement, prepare stipulation and order to approve same, and transmit for filing (1.0).	Del Castillo, Joshua	1.00	643.50	1,608.75	WO	HD	TR	_____
05/05/22	8818895	Emails with opposing counsel regarding settlement (0.2).	Del Castillo, Joshua	0.20	128.70	1,737.45	WO	HD	TR	_____
05/11/22	8824227	Emails and teleconference regarding pending settlement (0.3).	Del Castillo, Joshua	0.30	193.05	1,930.50	WO	HD	TR	_____
05/16/22	8828032	Follow-up inquiries regarding settlement and settlement payment (0.2).	Del Castillo, Joshua	0.20	128.70	2,059.20	WO	HD	TR	_____

08/03/22 17:15:17 PROFORMA STATEMENT FOR MATTER 378224.00016 (Winkler, Geoff/Receiver for Essex Capita) (Siemens Litigation)

Fees for Matter 378224.00016.(Siemens Litigation)

Trans Date	Index	Description of Service Rendered	Timekeeper	Hours	Fees	Sum	Circle	Action	
05/18/22	8831110	Confer with counsel and emails regarding status of settlement payment (0.2).	Del Castillo, Joshua	0.20	128.70	2,187.90	WO	HD	TR
05/23/22	8836067	Review and revise draft stipulation and order (0.3).	Del Castillo, Joshua	0.30	193.05	2,380.95	WO	HD	TR
05/23/22	8846263	Draft stipulation and proposed order regarding dismissal of action with prejudice	Pham, Matt D.	0.40	165.60	2,546.55	WO	HD	TR
05/24/22	8837938	Emails regarding confirmation of dismissal filing (0.2).	Del Castillo, Joshua	0.20	128.70	2,675.25	WO	HD	TR
05/27/22	8842181	Review order regarding dismissal (0.1).	Del Castillo, Joshua	0.10	64.35	2,739.60	WO	HD	TR

Proforma Summary

Timekeeper

Number	Timekeeper	Hours	Rate	Amounts
001842	Del Castillo, Joshua	4.00	643.50	2,574.00
002510	Pham, Matt D.	0.40	414.00	165.60
		<u>4.40</u>		<u>\$2,739.60</u>
Subtotal Fees				\$2,739.60
Discount				0.00
Total Fees				2,739.60
Total Disbursements				0.00

Attorney Billing Instructions

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

Billing Instructions

expires 6/30/2023: 10% off standard rates (automatic)

08/03/22 17:15:17 PROFORMA STATEMENT FOR MATTER 378224.00016 (Winkler, Geoff/Receiver for Essex Capita) (Siemens Litigation)

Account Summary – As Of 08/03/22

	Fiscal YTD			Calendar YTD			LTD		
	Total	Fees	Disb.	Total	Fees	Disb.	Total	Fees	Disbursements
Worked	0.00	0.00	0.00	27,420.30	27,420.30	0.00	30,964.50	30,964.50	0.00
Unbilled Adj	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00
Billed	0.00	0.00	0.00	3,276.90	3,276.90	0.00	3,544.20	3,544.20	0.00
Collected	0.00	0.00	0.00	3,276.90	3,276.90	0.00	3,544.20	3,544.20	0.00
AR Write Off	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00
	Total	Fees	Costs						
WIP	27,420.30	27,420.30	0.00						
Balance									
AR Balance	0.00	0.00	0.00						
Unalloc	0.00								
Payment									
Client Trust	0.00								
Balance									

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

08/03/22 17:15:18 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: 04/29/22 Matter Name: Fead Litigation
 Proforma Number: 1175209
 Client/Matter Joint Group # 378224-1 Client Matter Number:

Fees for Matter 378224.00017.(Fead Litigation)

Trans Date	Index	Description of Service Rendered	Timekeeper	Hours	Fees	Sum	Circle	Action		
04/04/22	8783693	Teleconference with opposing counsel and finalize draft settlement agreement (0.7); transmit to counsel regarding same (0.1); review scheduling order (0.1).	Del Castillo, Joshua	0.90	579.15	579.15	WO	HD	TR	_____
05/03/22	8816514	Finalize settlement related materials, confer with Receiver's office, and prepare for filing (0.7).	Del Castillo, Joshua	0.70	450.45	1,029.60	WO	HD	TR	_____
05/05/22	8818894	Emails with opposing counsel regarding settlement (0.2).	Del Castillo, Joshua	0.20	128.70	1,158.30	WO	HD	TR	_____
05/11/22	8824228	Emails and teleconference regarding pending settlement (0.3).	Del Castillo, Joshua	0.30	193.05	1,351.35	WO	HD	TR	_____
05/16/22	8828031	Follow-up inquiries regarding settlement and settlement payment and correspondence regarding same (0.5).	Del Castillo, Joshua	0.50	321.75	1,673.10	WO	HD	TR	_____
05/18/22	8831111	Confer with counsel and emails regarding status of settlement payment (0.2).	Del Castillo, Joshua	0.20	128.70	1,801.80	WO	HD	TR	_____
05/23/22	8836068	Review and revise draft stipulation and order (0.3).	Del Castillo, Joshua	0.30	193.05	1,994.85	WO	HD	TR	_____

08/03/22 17:15:18 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	
05/23/22	8846261	Draft stipulation and proposed order regarding dismissal of action with prejudice	Pham, Matt D.	0.70	289.80	2,284.65	WO	HD	TR
05/24/22	8837936	Emails regarding confirmation of dismissal filing (0.2).	Del Castillo, Joshua	0.20	128.70	2,413.35	WO	HD	TR
05/27/22	8842179	Review order regarding dismissal (0.1).	Del Castillo, Joshua	0.10	64.35	2,477.70	WO	HD	TR

Proforma Summary

Timekeeper

Number	Timekeeper	Hours	Rate	Amounts
001842	Del Castillo, Joshua	3.40	643.50	2,187.90
002510	Pham, Matt D.	0.70	414.00	289.80
		<u>4.10</u>		<u>\$2,477.70</u>
Subtotal Fees				\$2,477.70
Discount				0.00
Total Fees				2,477.70
Total Disbursements				0.00

Attorney Billing Instructions

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

Billing Instructions

expires 6/30/2023: 10% off standard rates (automatic)

Account Summary – As Of 08/03/22

Fiscal YTD

Calendar YTD

LTD

08/03/22 17:15:18 PROFORMA STATEMENT FOR MATTER 378224.00017 (Winkler, Geoff/Receiver for Essex Capita) (Fead Litigation)

	Total	Fees	Disb.	Total	Fees	Disb.	Total	Fees	Disbursements
Worked	0.00	0.00	0.00	28,462.95	28,462.95	0.00	35,427.15	35,427.15	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	6,385.05	6,385.05	0.00	6,964.20	6,964.20	0.00
Collected	0.00	0.00	0.00	6,385.05	6,385.05	0.00	6,964.20	6,964.20	0.00
AR Write Off	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00
	Total	Fees	Costs						
WIP	28,462.95	28,462.95	0.00						
Balance									
AR Balance	0.00	0.00	0.00						
Unalloc	0.00								
Payment									
Client Trust	0.00								
Balance									

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

08/03/22 17:15:19 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: 04/29/22 Matter Name: Largura Litigation
 Proforma Number: 1175209
 Client/Matter Joint Group # 378224-1 Client Matter Number:

Fees for Matter 378224.00018.(Largura Litigation)

Trans Date	Index	Description of Service Rendered	Timekeeper	Hours	Fees	Sum	Circle	Action		
04/01/22	8783551	Review and respond to correspondence from J. Hudgens and attention to prospective settlement matters (0.6).	Del Castillo, Joshua	0.60	386.10	386.10	WO	HD	TR	_____
04/04/22	8783694	Review Receiver accounting and teleconference with opposing counsel regarding upcoming mandatory settlement conference (0.8); review materials transmitted by counsel in connection with same (0.2); emails with Receiver's office (0.3).	Del Castillo, Joshua	1.30	836.55	1,222.65	WO	HD	TR	_____
04/05/22	8784946	Emails and teleconference with Receiver's office regarding Largura accounting updates and prepare inquiry to opposing counsel in connection with same (0.5).	Del Castillo, Joshua	0.50	321.75	1,544.40	WO	HD	TR	_____
04/07/22	8786995	Emails and teleconferences with Receiver's office, opposing counsel, and Court clerk regarding settlement and upcoming settlement conference (1.0).	Del Castillo, Joshua	1.00	643.50	2,187.90	WO	HD	TR	_____
04/08/22	8787790	Review materials from Receiver's office and prepare for and attend initial telephonic	Del Castillo, Joshua	3.10	1,994.85	4,182.75	WO	HD	TR	_____

08/03/22 17:15:19 PROFORMA STATEMENT FOR MATTER 378224.00018 (Winkler, Geoff/Receiver for Essex Capita) (Largura Litigation)

Fees for Matter 378224.00018.(Largura Litigation)

Trans Date	Index	Description of Service Rendered	Timekeeper	Hours	Fees	Sum	Circle	Action		
		mediation session (1.8); emails with Receiver regarding accounting inquiry (0.5); prepare, transmit, and file stipulation to continue mandatory settlement conference deadline (0.8).								
04/12/22	8790665	Review order on mandatory settlement conference and emails to client regarding updating accounting and related matters (0.6).	Del Castillo, Joshua	0.60	386.10	4,568.85	WO	HD	TR	_____
04/14/22	8793454	Review and respond to correspondence from Receiver's office regarding accounting (0.2); review and respond to email from Court regarding scheduling follow-up settlement conference (0.1).	Del Castillo, Joshua	0.30	193.05	4,761.90	WO	HD	TR	_____
04/15/22	8794319	Email to opposing counsel regarding scheduling mediation session (0.1).	Del Castillo, Joshua	0.10	64.35	4,826.25	WO	HD	TR	_____
04/15/22	8813184	Draft requests for production and interrogatories (0.7); Draft requests for admission (0.3)	Pham, Matt D.	1.00	414.00	5,240.25	WO	HD	TR	_____
04/17/22	8794851	Review Receiver's updated accounting and settlement correspondence with opposing counsel and counsel regarding same (0.9); review and attend to issues regarding anticipated written discovery (1.1).	Del Castillo, Joshua	2.00	1,287.00	6,527.25	WO	HD	TR	_____
04/18/22	8795757	Review and respond to correspondence from Court clerk, Receiver, and opposing counsel regarding mandatory settlement conference and attention to issues regarding same (0.7); confer with counsel and assemble and transmit accounting	Del Castillo, Joshua	1.50	965.25	7,492.50	WO	HD	TR	_____

08/03/22 17:15:19 PROFORMA STATEMENT FOR MATTER 378224.00018 (Winkler, Geoff/Receiver for Essex Capita) (Largura Litigation)

Fees for Matter 378224.00018.(Largura Litigation)

Trans Date	Index	Description of Service Rendered information and materials to opposing counsel (0.8).	Timekeeper	Hours	Fees	Sum	Circle	Action		
04/18/22	8813188	Draft email to John Hall regarding Largura documents and accounting (0.1); Prepare documents to be exchanged with Largura's counsel (0.2); Draft email to Hudgens regarding documents (0.1)	Pham, Matt D.	0.40	165.60	7,658.10	WO	HD	TR	_____
04/19/22	8796990	Review and respond to correspondence from J. Hudgens and provide update to Court regarding mandatory settlement conference scheduling; emails regarding same (0.3); confer with M. Pham regarding accounting and mediation session and emails regarding same (0.7).	Del Castillo, Joshua	1.00	643.50	8,301.60	WO	HD	TR	_____
04/19/22	8813203	Revise and update requests for admission, interrogatories, and requests for production (0.4); Prepare additional documents to be exchanged with Largura's counsel, draft email with explanation of 8 additional documents (0.3)	Pham, Matt D.	0.70	289.80	8,591.40	WO	HD	TR	_____
04/20/22	8798308	Emails with Receiver and counsel regarding mandatory settlement conference (0.3); teleconferences with counsel regarding mediation (0.9); review inquiry regarding anticipated discovery demands, legal analysis in connection with same, and prepare response (0.4).	Del Castillo, Joshua	1.60	1,029.60	9,621.00	WO	HD	TR	_____
04/20/22	8813221	Prepare for continued settlement conference (0.4); Virtually attend continued settlement conference (1.0); Update and revise requests for admission,	Pham, Matt D.	3.60	1,490.40	11,111.40	WO	HD	TR	_____

08/03/22 17:15:19 PROFORMA STATEMENT FOR MATTER 378224.00018 (Winkler, Geoff/Receiver for Essex Capita) (Largura Litigation)

Fees for Matter 378224.00018.(Largura Litigation)

Trans Date	Index	Description of Service Rendered	Timekeeper	Hours	Fees	Sum	Circle	Action		
		interrogatories (1.4); Prepare subpoenas to Largura's banks (0.4); Begin drafting second set of requests for admission (0.4)								
04/21/22	8800218	Review and revise document subpoenas and confer with counsel regarding same (0.3).	Del Castillo, Joshua	0.30	193.05	11,304.45	WO	HD	TR	_____
04/22/22	8801434	Review emails and voicemail from opposing counsel regarding potential further mandatory settlement conference and confer with counsel regarding same (0.5); voicemail to opposing counsel (0.1).	Del Castillo, Joshua	0.60	386.10	11,690.55	WO	HD	TR	_____
04/22/22	8813245	Draft email to Largura's counsel regarding settlement	Pham, Matt D.	0.20	82.80	11,773.35	WO	HD	TR	_____
04/25/22	8813260	Multiple phone calls with Largura's counsel regarding settlement (0.2); Draft email to Judge MacKinnon's clerk regarding settlement conference scheduling (0.1)	Pham, Matt D.	0.30	124.20	11,897.55	WO	HD	TR	_____
04/27/22	8813286	Compile and organize documents from client to be uploaded to Disco database	Pham, Matt D.	0.20	82.80	11,980.35	WO	HD	TR	_____
05/05/22	8818701	Review discovery demands and confer with counsel regarding same (0.6); teleconference with Receiver regarding settlement proposal and prepare update to opposing counsel regarding same (0.3).	Del Castillo, Joshua	0.90	579.15	12,559.50	WO	HD	TR	_____
05/09/22	8821782	Confer with counsel and prepare draft settlement agreement (1.5).	Del Castillo, Joshua	1.50	965.25	13,524.75	WO	HD	TR	_____
05/10/22	8822922	Emails and teleconferences with counsel and opposing counsel regarding	Del Castillo, Joshua	0.50	321.75	13,846.50	WO	HD	TR	_____

08/03/22 17:15:19 PROFORMA STATEMENT FOR MATTER 378224.00018 (Winkler, Geoff/Receiver for Essex Capita) (Largura Litigation)

Fees for Matter 378224.00018.(Largura Litigation)

Trans Date	Index	Description of Service Rendered	Timekeeper	Hours	Fees	Sum	Circle	Action		
		substitution of parties and settlement (0.5).								
05/11/22	8824226	Emails and teleconference regarding pending settlement (0.5); review and revise notice of settlement, stipulation, and proposed order and confer with counsel regarding same (0.5).	Del Castillo, Joshua	1.00	643.50	14,490.00	WO	HD	TR	_____
05/11/22	8846189	Draft stipulation and proposed order regarding substitution of Robert Largura (1.7); Draft notice of settlement (0.5); Continue drafting notice of settlement (0.4); Revise and finalize drafts of stipulation regarding substitution and notice of settlement; draft email to opposing counsel regarding same (0.4)	Pham, Matt D.	3.00	1,242.00	15,732.00	WO	HD	TR	_____
05/16/22	8828528	Review scheduling order and confer with counsel regarding same (0.2).	Del Castillo, Joshua	0.20	128.70	15,860.70	WO	HD	TR	_____
05/31/22	8847605	Emails regarding status of stipulation to substitute and confer with counsel regarding upcoming status conference (0.5).	Del Castillo, Joshua	0.50	321.75	16,182.45	WO	HD	TR	_____
06/29/22	8878392	Confer with counsel regarding status of party substitution and settlement (0.2); review and comment on stipulation, proposed order, and revised settlement agreement (0.2).	Del Castillo, Joshua	0.40	257.40	16,439.85	WO	HD	TR	_____
06/29/22	8883123	Phone call with Jim Hudgens regarding substitution, update stipulation and proposed order regarding substitution (0.4); Revise and update settlement agreement (0.6)	Pham, Matt D.	1.00	414.00	16,853.85	WO	HD	TR	_____

08/03/22 17:15:19 PROFORMA STATEMENT FOR MATTER 378224.00018 (Winkler, Geoff/Receiver for Essex Capita) (Largura Litigation)

Fees for Matter 378224.00018.(Largura Litigation)

Trans Date	Index	Description of Service Rendered	Timekeeper	Hours	Fees	Sum	Circle Action
Proforma Summary							
Timekeeper							
Number		Timekeeper		Hours	Rate	Amounts	
001842		Del Castillo, Joshua		19.50	643.50	12,548.25	
002510		Pham, Matt D.		10.40	414.00	4,305.60	
				<u>29.90</u>		<u>\$16,853.85</u>	
Subtotal Fees						\$16,853.85	
Discount						0.00	
Total Fees						16,853.85	
Total Disbursements						0.00	

Attorney Billing Instructions

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

Billing Instructions

expires 6/30/2023: 10% off standard rates (automatic)

Account Summary – As Of 08/03/22

	Fiscal YTD			Calendar YTD			LTD		
	Total	Fees	Disb.	Total	Fees	Disb.	Total	Fees	Disbursements
Worked	282.15	282.15	0.00	29,527.65	29,527.65	0.00	33,441.80	33,436.80	5.00
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	2,978.60	2,973.60	5.00	3,909.15	3,909.15	5.00
Collected	0.00	0.00	0.00	2,978.60	2,973.60	5.00	3,914.15	3,909.15	5.00
AR Write Off	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00
	Total	Fees	Costs						
WIP	29,527.65	29,527.65	0.00						

08/03/22 17:15:19 PROFORMA STATEMENT FOR MATTER 378224.00018 (Winkler, Geoff/Receiver for Essex Capita) (Largura Litigation)

Balance			
AR Balance	0.00	0.00	0.00
Unalloc	0.00		
Payment			
Client Trust	0.00		
Balance			

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

08/03/22 17:15:21 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: 04/29/22 Matter Name: Hopen Litigation
 Proforma Number: 1175209
 Client/Matter Joint Group # 378224-1 Client Matter Number:

Fees for Matter 378224.00019.(Hopen Litigation)

Trans Date	Index	Description of Service Rendered	Timekeeper	Hours	Fees	Sum	Circle	Action		
04/06/22	8785998	Emails with opposing counsel regarding 26(f) report and confer regarding same (0.5).	Del Castillo, Joshua	0.50	321.75	321.75	WO	HD	TR	_____
04/07/22	8786667	Review and finalize 26(f) Report, confer with opposing counsel, and prepare for filing (0.4).	Del Castillo, Joshua	0.40	257.40	579.15	WO	HD	TR	_____
04/08/22	8787917	Review and respond to correspondence regarding drafting initial disclosures (0.3).	Del Castillo, Joshua	0.30	193.05	772.20	WO	HD	TR	_____
04/11/22	8789421	Draft Hopen Initial disclosures (.9).	O'Neal, Mikayla	0.90	311.85	1,084.05	WO	HD	TR	_____
04/12/22	8790544	Review initial disclosures and send email transmitting same to M. Pham and J. del Castillo.	O'Neal, Mikayla	0.20	69.30	1,153.35	WO	HD	TR	_____
04/13/22	8792196	Emails and teleconferences regarding disgorgement litigation and discovery status and prepare update to Receiver regarding same (0.5).	Del Castillo, Joshua	0.50	321.75	1,475.10	WO	HD	TR	_____

08/03/22 17:15:21 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		
04/14/22	8793420	Review and revise draft initial disclosures (0.5).	Del Castillo, Joshua	0.50	321.75	1,796.85	WO	HD	TR	_____
05/05/22	8818723	Review scheduling order and joint status report and attention to case administration matters (0.5).	Del Castillo, Joshua	0.50	321.75	2,118.60	WO	HD	TR	_____
05/05/22	8846151	Draft email to client regarding Hopen-related documents (0.1); Revise and finalize initial disclosures; draft email to opposing counsel regarding initial disclosures (0.2)	Pham, Matt D.	0.30	124.20	2,242.80	WO	HD	TR	_____
05/10/22	8822966	Emails with opposing counsel regarding defendant's failure to serve timely initial disclosures and review prior settlement demands and responses to same (0.6).	Del Castillo, Joshua	0.60	386.10	2,628.90	WO	HD	TR	_____
05/11/22	8846190	Draft email to Milana Barkhanoy regarding documents	Pham, Matt D.	0.10	41.40	2,670.30	WO	HD	TR	_____
05/13/22	8826522	Review pleadings, court orders, and case file and confer with counsel regarding case administration matters (0.6).	Del Castillo, Joshua	0.60	386.10	3,056.40	WO	HD	TR	_____
05/13/22	8846214	Review and analyze scheduling order; draft email to Judge MacKinnon's courtroom deputy regarding scheduling of mandatory settlement conference	Pham, Matt D.	0.20	82.80	3,139.20	WO	HD	TR	_____
05/23/22	8836194	Review documents in connection with anticipated revised settlement demand and forthcoming discovery and mediation statement (2.8); confer with counsel regarding same (0.3).	Del Castillo, Joshua	3.10	1,994.85	5,134.05	WO	HD	TR	_____

08/03/22 17:15:21 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		
05/23/22	8846265	Review and analyze documents relating to transactions between Essex and Hopen (0.7); Confer with Josh del Castillo regarding reviewed documents (0.3); Review and analyze additional documents and accounting relating to \$256,000 transfer (0.9)	Pham, Matt D.	1.90	786.60	5,920.65	WO	HD	TR	_____
05/25/22	8839522	Confer regarding accounting and prospective settlement demand matters (0.3); review documents in connection with accounting inquiry (0.5).	Del Castillo, Joshua	0.80	514.80	6,435.45	WO	HD	TR	_____
05/26/22	8840715	Emails and teleconference with Receiver's office and counsel regarding draft settlement proposal and accounting issues (0.6).	Del Castillo, Joshua	0.60	386.10	6,821.55	WO	HD	TR	_____
05/31/22	8849785	Draft interrogatories (0.6); Draft requests for production (0.6).	Pham, Matt D.	1.20	496.80	7,318.35	WO	HD	TR	_____
06/06/22	8878244	Telephone conferences and analysis re: proof of use of funds and effect of same on settlement strategy.	Farrell, Michael	0.40	307.80	7,626.15	WO	HD	TR	_____
06/17/22	8882886	Draft requests for admission and requests for production; revise interrogatories	Pham, Matt D.	1.70	703.80	8,329.95	WO	HD	TR	_____
06/20/22	8882891	Revise and finalize requests for admission, requests for production, interrogatories	Pham, Matt D.	0.30	124.20	8,454.15	WO	HD	TR	_____
06/28/22	8876151	Review and respond to correspondence regarding pending discovery; emails with counsel regarding same (0.4).	Del Castillo, Joshua	0.40	257.40	8,711.55	WO	HD	TR	_____

08/03/22 17:15:21 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
06/28/22	8877098	Reviewed opposing counsel's request for discovery extension and exchanged e-mails re: response to same (.3); analysis and exchange of e-mails re: settlement conference issues and timing (.2).	Farrell, Michael	0.50	384.75	9,096.30	WO	HD TR

Proforma Summary

Timekeeper

Number	Timekeeper	Hours	Rate	Amounts
000739	Farrell, Michael	0.90	769.50	692.55
001842	Del Castillo, Joshua	8.80	643.50	5,662.80
002396	O'Neal, Mikayla	1.10	346.50	381.15
002510	Pham, Matt D.	5.70	414.00	2,359.80
		<u>16.50</u>		<u>\$9,096.30</u>
Subtotal Fees				\$9,096.30
Discount				0.00
Total Fees				9,096.30
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 6/30/2023: 10% off standard rates (automatic)

Account Summary – As Of 08/03/22

	Fiscal YTD			Calendar YTD			LTD		
	Total	Fees	Disb.	Total	Fees	Disb.	Total	Fees	Disbursements
Worked	1,897.65	1,897.65	0.00	15,149.25	15,149.25	0.00	20,398.95	20,398.95	0.00

08/03/22 17:15:21 PROFORMA STATEMENT FOR MATTER 378224.00019 (Winkler, Geoff/Receiver for Essex Capita) (Hopen Litigation)

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	5,249.70	5,249.70	0.00	5,249.70	5,249.70	0.00
Collected	0.00	0.00	0.00	5,249.70	5,249.70	0.00	5,249.70	5,249.70	0.00
AR Write Off	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00
	Total	Fees	Costs						
WIP	15,149.25	15,149.25	0.00						
Balance									
AR Balance	0.00	0.00	0.00						
Unalloc	0.00								
Payment									
Client Trust	0.00								
Balance									

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

08/03/22 17:15:22 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: 04/29/22 Matter Name: Nicholson Litigation
 Proforma Number: 1175209
 Client/Matter Joint Group # 378224-1 Client Matter Number:

Fees for Matter 378224.00020.(Nicholson Litigation)

Trans Date	Index	Description of Service Rendered	Timekeeper	Hours	Fees	Sum	Circle	Action		
04/12/22	8809833	Reviewed draft supplemental report and exchanged e-mails re: same.	Farrell, Michael	0.30	230.85	230.85	WO	HD	TR	_____
04/13/22	8810281	Conference and analysis re: case issues, deadlines and strategy.	Farrell, Michael	0.30	230.85	461.70	WO	HD	TR	_____
04/15/22	8810743	Reviewed materials re: party arguments and evidence (.5); analysis re: discovery strategy (.2).	Farrell, Michael	0.70	538.65	1,000.35	WO	HD	TR	_____
04/20/22	8798490	Teleconference regarding outstanding discovery responses (0.2).	Del Castillo, Joshua	0.20	128.70	1,129.05	WO	HD	TR	_____
04/20/22	8813219	Draft email to client regarding Nicholson discovery requests (0.1); Review and analyze Nicholson's requests for admission, interrogatories (0.5)	Pham, Matt D.	0.60	248.40	1,377.45	WO	HD	TR	_____
04/22/22	8813721	Analysis and review of materials re: potential discovery coordination with opposing counsel.	Farrell, Michael	0.20	153.90	1,531.35	WO	HD	TR	_____
04/25/22	8813866	Telephone conference with opposing counsel and analysis re: potential discovery	Farrell, Michael	0.30	230.85	1,762.20	WO	HD	TR	_____

08/03/22 17:15:22 PROFORMA STATEMENT FOR MATTER 378224.00020 (Winkler, Geoff/Receiver for Essex Capita) (Nicholson Litigation)

Fees for Matter 378224.00020.(Nicholson Litigation)

Trans Date	Index	Description of Service Rendered	Timekeeper	Hours	Fees	Sum	Circle	Action		
		coordination plan and strategy to address same.								
04/27/22	8813283	Draft responses to Nicholson's requests for admission (0.9); Compile and organize documents from client to be uploaded to Disco database (0.2)	Pham, Matt D.	1.10	455.40	2,217.60	WO	HD	TR	_____
04/29/22	8813302	Continue drafting responses to requests for admission (0.5); Continue drafting responses to interrogatories (1.0); Draft responses to requests for production (0.5); Continue drafting responses to interrogatories (2.9)	Pham, Matt D.	4.90	2,028.60	4,246.20	WO	HD	TR	_____
05/02/22	8843498	Telephone conference, analysis, review of e-mail and review of discovery responses re: damages issues and strategy.	Farrell, Michael	0.60	461.70	4,707.90	WO	HD	TR	_____
05/02/22	8846121	Revise responses to Defendant's interrogatories (0.4); Draft email to client regarding discovery responses (0.1); Review and analyze client's documents for responsiveness/production (2.4); Continue drafting responses to Defendant's requests for production (1.6); Review and analyze client's documents for responsiveness/production (1.1); Confer with Mike Farrell regarding changes to written discovery responses (0.1); Revise and finalize responses to requests for production, requests for admission, and interrogatories (0.8)	Pham, Matt D.	6.50	2,691.00	7,398.90	WO	HD	TR	_____
05/03/22	8843936	Analysis re: statute of limitations and summary judgment issues (.3); reviewed	Farrell, Michael	0.50	384.75	7,783.65	WO	HD	TR	_____

08/03/22 17:15:22 PROFORMA STATEMENT FOR MATTER 378224.00020 (Winkler, Geoff/Receiver for Essex Capita) (Nicholson Litigation)

Fees for Matter 378224.00020.(Nicholson Litigation)

Trans Date	Index	Description of Service Rendered	Timekeeper	Hours	Fees	Sum	Circle	Action		
		memorandum re: claim analysis (.2).								
05/04/22	8843968	Telephone conference, analysis and review of pertinent documents re: defense allegations and potential settlement issues.	Farrell, Michael	0.70	538.65	8,322.30	WO	HD	TR	_____
05/05/22	8846152	Coordinate with paralegal regarding Receiver's document production	Pham, Matt D.	0.30	124.20	8,446.50	WO	HD	TR	_____
05/06/22	8844039	Telephone conference with opposing counsel re: settlement issues and analysis re: same.	Farrell, Michael	0.20	153.90	8,600.40	WO	HD	TR	_____
05/11/22	8846191	Conference with Milana Barkhanoy regarding documents	Pham, Matt D.	0.10	41.40	8,641.80	WO	HD	TR	_____
05/13/22	8826520	Review pleadings, court orders, and case file and confer with counsel regarding case administration matters (0.6).	Del Castillo, Joshua	0.60	386.10	9,027.90	WO	HD	TR	_____
05/13/22	8846217	Review and analyze scheduling order; draft email to Judge MacKinnon's courtroom deputy regarding scheduling of mandatory settlement conference	Pham, Matt D.	0.10	41.40	9,069.30	WO	HD	TR	_____
05/18/22	8846236	Continue drafting requests for admission to Defendant	Pham, Matt D.	1.30	538.20	9,607.50	WO	HD	TR	_____
05/25/22	8846283	Review and analyze client's documents; continue drafting requests for admission (1.2); Continue drafting interrogatories to Defendant (0.7); Continue drafting requests for production (0.5)	Pham, Matt D.	2.40	993.60	10,601.10	WO	HD	TR	_____
05/26/22	8841068	Review documents and confer with counsel regarding disgorgement, discovery, and	Del Castillo, Joshua	0.60	386.10	10,987.20	WO	HD	TR	_____

08/03/22 17:15:22 PROFORMA STATEMENT FOR MATTER 378224.00020 (Winkler, Geoff/Receiver for Essex Capita) (Nicholson Litigation)

Fees for Matter 378224.00020.(Nicholson Litigation)

Trans Date	Index	Description of Service Rendered	Timekeeper	Hours	Fees	Sum	Circle	Action		
		accounting issues (0.6).								
05/26/22	8841550	Conference and analysis re: damages calculations and potential effect of case strategy and settlement.	Farrell, Michael	0.30	230.85	11,218.05	WO	HD	TR	_____
05/26/22	8846288	Continue drafting requests for production (1.5); Continue drafting interrogatories and requests for production (0.7)	Pham, Matt D.	2.20	910.80	12,128.85	WO	HD	TR	_____
05/30/22	8847431	Legal analysis in connection with Receiver's pending claims (1.0); attention to prospective discovery and summary judgment issues (1.5).	Del Castillo, Joshua	2.50	1,608.75	13,737.60	WO	HD	TR	_____
05/31/22	8849781	Update and revise requests for production and interrogatories	Pham, Matt D.	0.50	207.00	13,944.60	WO	HD	TR	_____
06/02/22	8877950	Conference and analysis re: accounting issues and settlement strategy.	Farrell, Michael	0.20	153.90	14,098.50	WO	HD	TR	_____
06/06/22	8858989	Evaluate emails/status of the litigation and prior analysis (.3). Call with counsel as to settlement strategy (.3).	Zaro, David	0.60	502.20	14,600.70	WO	HD	TR	_____
06/06/22	8878241	Telephone conference and analysis re: party positions, evidence and settlement issues.	Farrell, Michael	0.40	307.80	14,908.50	WO	HD	TR	_____
06/10/22	8882729	Draft email to John Hall regarding Nicholson/SIU transactions	Pham, Matt D.	0.10	41.40	14,949.90	WO	HD	TR	_____
06/11/22	8882760	Draft and revise requests for production and interrogatories to defendant	Pham, Matt D.	0.40	165.60	15,115.50	WO	HD	TR	_____

08/03/22 17:15:22 PROFORMA STATEMENT FOR MATTER 378224.00020 (Winkler, Geoff/Receiver for Essex Capita) (Nicholson Litigation)

Fees for Matter 378224.00020.(Nicholson Litigation)

Trans Date	Index	Description of Service Rendered	Timekeeper	Hours	Fees	Sum	Circle	Action	
06/20/22	8879662	Review and analysis of draft discovery and exchanged e-mails re: same.	Farrell, Michael	0.40	307.80	15,423.30	WO	HD	TR
06/20/22	8882890	Continue drafting requests for admission to defendant (1.4); Revise and finalize requests for admission, requests for production, interrogatories (0.3)	Pham, Matt D.	1.70	703.80	16,127.10	WO	HD	TR
06/28/22	8877104	Initial review and analysis of meet and confer letter from opposing counsel and analysis re: response to same (.3); analysis and exchange of correspondence re: settlement conference scheduling (.2).	Farrell, Michael	0.50	384.75	16,511.85	WO	HD	TR

Proforma Summary

Timekeeper

Number	Timekeeper	Hours	Rate	Amounts
000313	Zaro, David	0.60	837.00	502.20
000739	Farrell, Michael	5.60	769.50	4,309.20
001842	Del Castillo, Joshua	3.90	643.50	2,509.65
002510	Pham, Matt D.	22.20	414.00	9,190.80
		<u>32.30</u>		<u>\$16,511.85</u>
Subtotal Fees				\$16,511.85
Discount				0.00
Total Fees				16,511.85
Total Disbursements				0.00

Attorney Billing Instructions

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

Billing Instructions

08/03/22 17:15:22 PROFORMA STATEMENT FOR MATTER 378224.00020 (Winkler, Geoff/Receiver for Essex Capita) (Nicholson Litigation)

expires 6/30/2023: 10% off standard rates (automatic)

Account Summary – As Of 08/03/22

	Fiscal YTD			Calendar YTD			LTD		
	Total	Fees	Disb.	Total	Fees	Disb.	Total	Fees	Disbursements
Worked	4,646.25	4,646.25	0.00	24,429.15	24,429.15	0.00	25,768.35	25,768.35	0.00
Unbilled Adj	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00
Billed	0.00	0.00	0.00	1,339.20	1,339.20	0.00	1,339.20	1,339.20	0.00
Collected	0.00	0.00	0.00	1,339.20	1,339.20	0.00	1,339.20	1,339.20	0.00
AR Write Off	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00
	Total	Fees	Costs						
WIP Balance	24,429.15	24,429.15	0.00						
AR Balance	0.00	0.00	0.00						
Unalloc Payment	0.00								
Client Trust Balance	0.00								

Billing Address

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

08/03/22 17:15:23 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: 04/29/22 Matter Name: Reyner Litigation
 Proforma Number: 1175209
 Client/Matter Joint Group # 378224-1 Client Matter Number:

Fees for Matter 378224.00021.(Reyner Litigation)

Trans Date	Index	Description of Service Rendered	Timekeeper	Hours	Fees	Sum	Circle	Action		
04/01/22	8808484	Reviewed e-mail and attached documents from opposing counsel and exchanged e-mails re: same ().	Farrell, Michael	0.40	307.80	307.80	WO	HD	TR	_____
04/04/22	8783825	Confer with counsel and review and respond to correspondence regarding pending discovery (0.5).	Del Castillo, Joshua	0.50	321.75	629.55	WO	HD	TR	_____
04/05/22	8790906	Analysis of evidence concerning the Reyner matter, settlement strategy and advice to counsel regarding discovery/settlement.	Zaro, David	0.40	334.80	964.35	WO	HD	TR	_____
04/06/22	8785803	Confer with counsel regarding Reyner accounting and prospective settlement approach (0.5).	Del Castillo, Joshua	0.50	321.75	1,286.10	WO	HD	TR	_____
04/06/22	8808624	Review, analysis and exchange of e-mails re: Reyner transactions and effect on settlement positions.	Farrell, Michael	0.20	153.90	1,440.00	WO	HD	TR	_____
04/08/22	8809064	Analysis and review of e-mails from opposing counsel re: discovery issues.	Farrell, Michael	0.20	153.90	1,593.90	WO	HD	TR	_____

08/03/22 17:15:23 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		
04/11/22	8809690	Analysis and review of e-mails re: discovery issues.	Farrell, Michael	0.20	153.90	1,747.80	WO	HD	TR	_____
04/12/22	8791128	Emails regarding discovery status and potential settlement proposals (0.5).	Del Castillo, Joshua	0.50	321.75	2,069.55	WO	HD	TR	_____
04/12/22	8809823	Analysis and exchange of e-mails re: disgorgement calculation issues (.2); reviewed draft supplemental report and exchanged e-mails re: same (.3).	Farrell, Michael	0.50	384.75	2,454.30	WO	HD	TR	_____
04/12/22	8813140	Review documents for responsiveness and privilege	Pham, Matt D.	1.30	538.20	2,992.50	WO	HD	TR	_____
04/13/22	8792150	Confer with counsel regarding document review (.4); Review of documents for production (1.5)	Rosenblum, Rachel	1.90	598.50	3,591.00	WO	HD	TR	_____
04/13/22	8792195	Emails and teleconferences regarding disgorgement litigation and discovery status and prepare update to Receiver regarding same (0.5).	Del Castillo, Joshua	0.50	321.75	3,912.75	WO	HD	TR	_____
04/13/22	8810290	Conference and analysis re: case issues, deadlines and strategy (.3); analysis and exchange of e-mails with counsel and client re: disgorgement calculation and documents addressing same (.4).	Farrell, Michael	0.70	538.65	4,451.40	WO	HD	TR	_____
04/14/22	8792940	Document review for production (3.5)	Rosenblum, Rachel	3.50	1,102.50	5,553.90	WO	HD	TR	_____
04/14/22	8810452	Conference and analysis re: timing and strategy for addressing disgorgement calculation issues and settlement strategy.	Farrell, Michael	0.50	384.75	5,938.65	WO	HD	TR	_____

08/03/22 17:15:23 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		
04/15/22	8794304	Review correspondence regarding upcoming mediation and teleconference with M. Farrell regarding same (0.5); review notes and documents and prepare draft Confidential Mediation Statement (1.7); emails and teleconferences regarding same (0.3).	Del Castillo, Joshua	2.50	1,608.75	7,547.40	WO	HD	TR	_____
04/15/22	8810753	Telephone conference and analysis re: settlement conference issues, procedures and strategy (.4); review and analysis of correspondence from client re: assessment of new investment evidence from Reyner and effect of same on calculations (.2); review, analysis and exchange of e-mails with client and counsel re: settlement conference scheduling (.2); review, analysis and revision of draft settlement conference statement and exchanged e-mails re: same (.8).	Farrell, Michael	1.60	1,231.20	8,778.60	WO	HD	TR	_____
04/16/22	8794850	Review and respond to correspondence from M. Farrell and J. Hall regarding mediation and revised accounting (0.5); prepare revisions to and finalize Confidential Mediation Statement (1.9).	Del Castillo, Joshua	2.40	1,544.40	10,323.00	WO	HD	TR	_____
04/17/22	8794855	Attention to exhibit to Confidential Mediation Statement (0.3).	Del Castillo, Joshua	0.30	193.05	10,516.05	WO	HD	TR	_____
04/17/22	8810793	Review and analysis of revised version of settlement conference statement and exchanged e-mails re: same.	Farrell, Michael	0.80	615.60	11,131.65	WO	HD	TR	_____
04/18/22	8795756	Confer with counsel regarding mandatory settlement conference and review and	Del Castillo, Joshua	1.00	643.50	11,775.15	WO	HD	TR	_____

08/03/22 17:15:23 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		
		respond to inquiries from Court regarding same (0.5); finalize confidential mediation statement and deliver to Court (0.5).								
04/18/22	8810834	Review, analysis and exchange of e-mails with client, opposing counsel and magistrate's office re: settlement conference scheduling (.3); review and analysis of order issued by magistrate's office (.2); review, analysis and exchange of e-mails re: upcoming discovery response deadline and reviewed response to same (.2); further review of discovery requests and analysis re: responses to same (.5).	Farrell, Michael	1.20	923.40	12,698.55	WO	HD	TR	_____
04/18/22	8813186	Review documents for responsiveness and privilege (3.0); Review and analyze Reyner Defendants' interrogatories and requests for admission (0.7)	Pham, Matt D.	3.70	1,531.80	14,230.35	WO	HD	TR	_____
04/19/22	8813205	Begin drafting responses to Reyner Defendants' requests for admission (1.9); Begin drafting responses to Reyner Defendants' interrogatories (1.0); Continue drafting responses to Reyner Defendants' requests for admission (1.5); Continue drafting responses to Reyner Defendants' interrogatories (0.6)	Pham, Matt D.	5.00	2,070.00	16,300.35	WO	HD	TR	_____
04/20/22	8798309	Emails and teleconferences with Receiver and counsel regarding mandatory settlement conference (0.6).	Del Castillo, Joshua	0.30	193.05	16,493.40	WO	HD	TR	_____
04/20/22	8811585	Conference and analysis re: settlement issues and strategy (.3); initial review and analysis of draft discovery responses (.6).	Farrell, Michael	0.90	692.55	17,185.95	WO	HD	TR	_____

08/03/22 17:15:23 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		
04/20/22	8813213	Continue drafting responses to Reyner Defendants' interrogatories (0.6); Continue drafting responses to Reyner Defendants' requests for admission (2.4); Draft four sets of responses to four sets of requests for admission (0.8)	Pham, Matt D.	3.80	1,573.20	18,759.15	WO	HD	TR	_____
04/21/22	8799921	Confer with counsel regarding disgorgement litigation, accounting, and discovery issues and review documents in connection with same (0.9).	Del Castillo, Joshua	0.90	579.15	19,338.30	WO	HD	TR	_____
04/21/22	8813236	Confer with Mike Farrell regarding responses to requests for admission	Pham, Matt D.	0.90	372.60	19,710.90	WO	HD	TR	_____
04/21/22	8813625	Conferences, analysis and review of various materials re: Reyner calculations and settlement strategy (.8); review and analysis of draft discovery responses (.9); conference and analysis re: revisions to same (.5).	Farrell, Michael	2.20	1,692.90	21,403.80	WO	HD	TR	_____
04/22/22	8801135	Emails with counsel regarding upcoming Mandatory Settlement Conference (0.3); review materials in connection with same (0.2).	Del Castillo, Joshua	0.50	321.75	21,725.55	WO	HD	TR	_____
04/22/22	8801762	Review updated accounting and associated documents and teleconference with counsel (0.5); review Court order (0.1).	Del Castillo, Joshua	0.60	386.10	22,111.65	WO	HD	TR	_____
04/22/22	8813243	Revise responses to Reyner Defendants' requests for admission (1.6); Continue revising responses to requests for admission (1.1); Review and analyze	Pham, Matt D.	2.90	1,200.60	23,312.25	WO	HD	TR	_____

08/03/22 17:15:23 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		
		revised accounting and new documents sent by client (0.2)								
04/22/22	8813687	Review, analysis and exchange of e-mails with client and opposing counsel re: discovery issues (.3); analysis re: potential discovery terms and strategy to address same (.2); review and analysis of revised draft discovery responses and e-mail to client re: same (.4).	Farrell, Michael	0.90	692.55	24,004.80	WO	HD	TR	_____
04/25/22	8803806	Review emails and confer with counsel regarding upcoming mediation (0.7).	Del Castillo, Joshua	0.70	450.45	24,455.25	WO	HD	TR	_____
04/25/22	8813259	Phone call with Reyner Defendants' counsel regarding discovery issues (0.4); Phone conference with Judge MacKinnon regarding settlement (0.5); Phone call with John Hall regarding responses to requests for admission (0.1); Revise responses to Reyner Defendants' requests for admission following John Hall's comments (0.5); Conitnue drafting responses to Reyner Defendants' requests for admission (0.7)	Pham, Matt D.	2.20	910.80	25,366.05	WO	HD	TR	_____
04/25/22	8813906	Telephone conference with opposing counsel and analysis re: potential discovery coordination plan and strategy to address same (.3); various telephone conferences, analysis and review of materials in preparation for call with magistrate and addressing settlement issues (1.4); participated in call with magistrate and analysis re: results of same (.5); review and analysis of e-mails and responses re: finalizing RFA responses for service and	Farrell, Michael	3.30	2,539.35	27,905.40	WO	HD	TR	_____

08/03/22 17:15:23 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		
		addressing client comments (1.1).								
04/26/22	8805054	Confer with counsel regarding upcoming mandatory settlement conference and issues and strategy regarding same (1.1); review and revise discovery and confer regarding same (0.5).	Del Castillo, Joshua	1.60	1,029.60	28,935.00	WO	HD	TR	_____
04/26/22	8810644	Several conferences, analysis of settlement proposals, assist/prepare for mediation, follow-up advice to counsel/Receiver.	Zaro, David	0.40	334.80	29,269.80	WO	HD	TR	_____
04/26/22	8813279	Review documents for Reyner settlement conference; compile documents for binder (1.0); Confer with Mike Farrell regarding client's accounting (0.2); Draft breakdown of accounting under various scenarios for Mike Farrell (0.4); Draft email to John Hall regarding responses to interrogatories (0.2)	Pham, Matt D.	1.80	745.20	30,015.00	WO	HD	TR	_____
04/26/22	8814044	Numerous conferences, review of materials, outlining of issues and analysis re: settlement conference and strategy (2.2); review and analysis of revised draft interrogatory response and exchanged e-mails re: same (.4).	Farrell, Michael	2.60	2,000.70	32,015.70	WO	HD	TR	_____
04/27/22	8806783	Emails and confer with counsel regarding mediation preparation (0.6); case law research and transmit results to counsel in connection with mediation (0.3).	Del Castillo, Joshua	0.90	579.15	32,594.85	WO	HD	TR	_____
04/27/22	8806974	Telephone conference with Receiver re: settlement conference strategy (.2); various conferences, review of documents and outlining of issues/arguments in preparation	Farrell, Michael	4.30	3,308.85	35,903.70	WO	HD	TR	_____

08/03/22 17:15:23 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		
		for settlement conference (1.3); participated in conference (2.1); various conferences and analysis re: results of conference and strategy going forward (.7).								
04/27/22	8813284	Review documents and prepare for settlement conference (0.6); Virtually attend settlement conference (2.1)	Pham, Matt D.	2.70	1,117.80	37,021.50	WO	HD	TR	_____
04/28/22	8809049	Review offer of judgment and case law cited in accompanying argument (0.5); prepare email to M. Farrell regarding same (0.1).	Del Castillo, Joshua	0.60	386.10	37,407.60	WO	HD	TR	_____
04/28/22	8809493	Various conferences and analysis re: settlement issues and strategy (.4); initial review of memorandum re: disgorgement actions (.3); initial review and analysis of offer of judgment and correspondence re: same (.4); conferences and analysis re: offer of judgment issues and strategy (.4).	Farrell, Michael	1.50	1,154.25	38,561.85	WO	HD	TR	_____
05/02/22	8843482	Conference, analysis and review of materials re: Rule 68 issues and strategy.	Farrell, Michael	0.80	615.60	39,177.45	WO	HD	TR	_____
05/03/22	8816517	Legal analysis of discovery rule matters and confer with counsel regarding same (1.1); teleconference and emails regarding settlement offer and prospective strategy for countering (0.8).	Del Castillo, Joshua	1.90	1,222.65	40,400.10	WO	HD	TR	_____
05/03/22	8843935	Telephone conferences, analysis and exchange of e-mails re: strategy to address offer of judgment.	Farrell, Michael	0.80	615.60	41,015.70	WO	HD	TR	_____

08/03/22 17:15:23 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		
05/04/22	8843983	Telephone conference, analysis and exchange of e-mails re: settlement issues and strategy.	Farrell, Michael	0.50	384.75	41,400.45	WO	HD	TR	_____
05/05/22	8818712	Teleconference regarding response to offer of judgment (0.2); confer with counsel regarding same (0.3).	Del Castillo, Joshua	0.50	321.75	41,722.20	WO	HD	TR	_____
05/05/22	8819896	Several emails/conferences with counsel as to Reyner settlement/negotiation strategy.	Zaro, David	0.20	167.40	41,889.60	WO	HD	TR	_____
05/05/22	8844028	Conference and analysis re: discussions with client on settlement strategy (.3); reviewed Statute of limitations case law and outlined issues for call with opposing counsel (.9); call to M. Napoli (.1).	Farrell, Michael	1.30	1,000.35	42,889.95	WO	HD	TR	_____
05/06/22	8844037	Telephone conference with M. Napoli re: settlement proposal and analysis re: results of same.	Farrell, Michael	0.40	307.80	43,197.75	WO	HD	TR	_____
05/10/22	8844394	Analysis and exchange of e-mails re: settlement status and timing.	Farrell, Michael	0.20	153.90	43,351.65	WO	HD	TR	_____
05/12/22	8824999	Confer with counsel regarding prospective settlement (0.2).	Del Castillo, Joshua	0.20	128.70	43,480.35	WO	HD	TR	_____
05/12/22	8846119	Telephone conference, analysis and exchange of e-mails re: offer of judgment and timing/strategy to address same.	Farrell, Michael	0.70	538.65	44,019.00	WO	HD	TR	_____
05/19/22	8833994	Evaluate several issues as to global settlement of CVL/Reyner matters, follow-up advice to counsel.	Zaro, David	0.40	334.80	44,353.80	WO	HD	TR	_____

08/03/22 17:15:23 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		
05/23/22	8839073	Evaluate several emails and follow-up meeting with counsel to advise as to strategy.	Zaro, David	0.60	502.20	44,856.00	WO	HD	TR	_____
05/25/22	8839517	Review and respond to correspondence regarding pending discovery and prospective settlement matters (0.6).	Del Castillo, Joshua	0.60	386.10	45,242.10	WO	HD	TR	_____
05/25/22	8841621	Telephone conference, analysis and exchange of e-mails re: expert designation issues (.6); review and analysis of draft expert disclosure document and exchanged e-mails re: same (.3).	Farrell, Michael	0.90	692.55	45,934.65	WO	HD	TR	_____
05/25/22	8846280	Draft initial expert witness disclosures	Pham, Matt D.	1.00	414.00	46,348.65	WO	HD	TR	_____
05/26/22	8841549	Conference, analysis and correspondence with opposing counsel re: settlement issues.	Farrell, Michael	0.30	230.85	46,579.50	WO	HD	TR	_____
05/27/22	8843123	Analysis and review of correspondence from opposing counsel re: substitution and settlement.	Farrell, Michael	0.20	153.90	46,733.40	WO	HD	TR	_____
05/31/22	8849827	Conference, analysis and drafting of e-mail re: settlement status and discussion.	Farrell, Michael	0.30	230.85	46,964.25	WO	HD	TR	_____
06/01/22	8877190	Analysis and exchange of e-mails with opposing counsel.	Farrell, Michael	0.20	153.90	47,118.15	WO	HD	TR	_____
06/02/22	8877946	E-mail to opposing counsel re: scheduling.	Farrell, Michael	0.10	76.95	47,195.10	WO	HD	TR	_____

08/03/22 17:15:23 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		
06/03/22	8852788	Review correspondence regarding disgorgement litigation, review documents, and prepare recommendations and questions regarding settlement (0.5).	Del Castillo, Joshua	0.50	321.75	47,516.85	WO	HD	TR	_____
06/03/22	8878158	Telephone conference, analysis and exchange of e-mails with opposing counsel re: case issues and settlement (.6); drafted summary of discussion for client and exchanged e-mails re: same (.5).	Farrell, Michael	1.10	846.45	48,363.30	WO	HD	TR	_____
06/05/22	8853482	Review and respond to correspondence regarding prospective settlement and settlement strategy (0.6).	Del Castillo, Joshua	0.60	386.10	48,749.40	WO	HD	TR	_____
06/05/22	8878168	Review, analysis and exchange of e-mails with clients and counsel re: settlement issues and strategy.	Farrell, Michael	0.30	230.85	48,980.25	WO	HD	TR	_____
06/06/22	8878228	Conference and analysis re: settlement issues and strategy.	Farrell, Michael	0.20	153.90	49,134.15	WO	HD	TR	_____
06/07/22	8855688	Review court notice and prepare inquiry to counsel regarding status of settlement discussion (0.2).	Del Castillo, Joshua	0.20	128.70	49,262.85	WO	HD	TR	_____
06/07/22	8878303	Analysis and exchange of e-mails re: settlement proposal and response to same.	Farrell, Michael	0.30	230.85	49,493.70	WO	HD	TR	_____
06/09/22	8858140	Review and respond to correspondence regarding prospective settlement strategy (0.4).	Del Castillo, Joshua	0.40	257.40	49,751.10	WO	HD	TR	_____
06/09/22	8878459	Review, analysis and exchange of numerous e-mails with clients and counsel re: settlement negotiations and strategy.	Farrell, Michael	0.70	538.65	50,289.75	WO	HD	TR	_____

08/03/22 17:15:23 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		
06/13/22	8862770	Conferences and analysis re: settlement issues and strategy.	Farrell, Michael	0.60	461.70	50,751.45	WO	HD	TR	_____
06/15/22	8878703	Conference and analysis re: client position on settlement (.2); telephone conference, analysis and exchange of e-mails with opposing counsel re: new proposal (.4).	Farrell, Michael	0.60	461.70	51,213.15	WO	HD	TR	_____
06/21/22	8879755	Analysis and e-mail to opposing counsel re: settlement discussions.	Farrell, Michael	0.10	76.95	51,290.10	WO	HD	TR	_____
06/22/22	8880539	Analysis and exchange of e-mails with client and opposing counsel re: settlement.	Farrell, Michael	0.20	153.90	51,444.00	WO	HD	TR	_____
06/23/22	8880755	Conference, analysis and exchange of e-mails re: settlement issues and strategy.	Farrell, Michael	0.20	153.90	51,597.90	WO	HD	TR	_____
06/28/22	8877100	Analysis and exchange of e-mails re: settlement status and strategy.	Farrell, Michael	0.40	307.80	51,905.70	WO	HD	TR	_____
06/29/22	8882732	Telephone conferences with D. Cousineau re: settlement and analysis re: same (.4); drafted summary of discussion to client with recommendation (.2).	Farrell, Michael	0.60	461.70	52,367.40	WO	HD	TR	_____
06/30/22	8880295	Confer with M. Farrell, M. Pham, and Receiver's office regarding settlement and motion for summary judgment matters (0.5).	Del Castillo, Joshua	0.50	321.75	52,689.15	WO	HD	TR	_____
06/30/22	8883122	Various conferences, review of materials, analysis and exchange of e-mails re: settlement, trial schedule, summary judgment, expert witness issues and overall strategy.	Farrell, Michael	1.30	1,000.35	53,689.50	WO	HD	TR	_____

08/03/22 17:15:23 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	TR
06/30/22	8883157	Confer with Mike Farrell and Josh del Castillo regarding settlement posture (0.2); Review summary judgment scheduling order; draft email to Mike Farrell and Josh del Castillo regarding briefing schedule (0.4)	Pham, Matt D.	0.60	248.40	53,937.90	WO	HD	TR

Disbursements for Matter 378224.00021 (Reyner Litigation)

Trans Date	Index	Type	Quantity	Amt	Circle	Action	TR
04/26/22	2762630	BW – Duplication - Black & White Copies	1,075.00	204.25	WO	HD	TR

Proforma Summary

Timekeeper		Hours	Rate	Amounts
Number	Timekeeper			
000313	Zaro, David	2.00	837.00	1,674.00
000739	Farrell, Michael	35.30	769.50	27,163.35
001842	Del Castillo, Joshua	19.70	643.50	12,676.95
002444	Rosenblum, Rachel	5.40	315.00	1,701.00
002510	Pham, Matt D.	25.90	414.00	10,722.60
		<u>88.30</u>		<u>\$53,937.90</u>
Subtotal Fees				\$53,937.90
Discount				0.00
Total Fees				53,937.90
Total Disbursements				204.25

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 |

08/03/22 17:15:23 PROFORMA STATEMENT FOR MATTER 378224.00021 (Winkler, Geoff/Receiver for Essex Capita) (Reyner Litigation)

Billing Instructions

expires 6/30/2023: 10% off standard rates (automatic)

Account Summary – As Of 08/03/22

	Fiscal YTD			Calendar YTD			LTD		
	Total	Fees	Disb.	Total	Fees	Disb.	Total	Fees	Disbursements
Worked	48,185.10	48,185.10	0.00	125,475.40	125,207.55	267.85	132,262.30	131,994.45	267.85
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	6,786.90	6,786.90	0.00	6,786.90	6,786.90	0.00
Collected	0.00	0.00	0.00	6,786.90	6,786.90	0.00	6,786.90	6,786.90	0.00
AR Write Off	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00
	Total	Fees	Costs						
WIP	125,647.40	125,207.55	439.85						
Balance									
AR Balance	0.00	0.00	0.00						
Unalloc	0.00								
Payment									
Client Trust	0.00								
Balance									

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

08/03/22 17:15:25 PROFORMA STATEMENT FOR MATTER 378224.00022 (Winkler, Geoff/Receiver for Essex Capita) (Emmons Litigation)

Preliminary Billing Form

Billing Atty: 001842 - Del Castillo, Joshua Matter #: 378224.00022 Client Name: Winkler, Geoff/Receiver for Essex Capita
 Date of Last Billing: 04/29/22 Matter Name: Emmons Litigation
 Proforma Number: 1175209
 Client/Matter Joint Group # 378224-1 Client Matter Number:

Fees for Matter 378224.00022.(Emmons Litigation)

Trans Date	Index	Description of Service Rendered	Timekeeper	Hours	Fees	Sum	Circle	Action		
04/20/22	8798492	Teleconference regarding outstanding discovery responses (0.2).	Del Castillo, Joshua	0.20	128.70	128.70	WO	HD	TR	_____
04/20/22	8813218	Draft email to client regarding Emmons discovery requests	Pham, Matt D.	0.10	41.40	170.10	WO	HD	TR	_____
04/26/22	8810642	Meeting with counsel as to status.	Zaro, David	0.40	334.80	504.90	WO	HD	TR	_____
04/26/22	8813278	Begin drafting responses to interrogatories	Pham, Matt D.	0.90	372.60	877.50	WO	HD	TR	_____
04/27/22	8813282	Draft responses to Emmons Defendants' requests for admission (1.4); Compile and organize documents from client to be uploaded to Disco database (0.2)	Pham, Matt D.	1.60	662.40	1,539.90	WO	HD	TR	_____
04/29/22	8813303	Continue drafting responses to requests for admission (0.6); Continue drafting responses to interrogatories (0.7); Continue drafting four sets of responses to four sets of interrogatories (2.3)	Pham, Matt D.	3.60	1,490.40	3,030.30	WO	HD	TR	_____

08/03/22 17:15:25 PROFORMA STATEMENT FOR MATTER 378224.00022 (Winkler, Geoff/Receiver for Essex Capita) (Emmons Litigation)

Fees for Matter 378224.00022.(Emmons Litigation)

Trans Date	Index	Description of Service Rendered	Timekeeper	Hours	Fees	Sum	Circle	Action		
05/02/22	8843499	Telephone conference, analysis, review of e-mail and review of discovery responses re: damages issues and strategy.	Farrell, Michael	0.60	461.70	3,492.00	WO	HD	TR	_____
05/02/22	8846120	Revise responses to Defendants' interrogatories (0.4); Draft email to client regarding discovery responses (0.1); Make additional revisions to responses to interrogatories and requests for admission (0.6); Revise and finalize responses to requests for admission and interrogatories (0.7)	Pham, Matt D.	1.80	745.20	4,237.20	WO	HD	TR	_____
05/13/22	8826518	Review pleadings, court orders, and case file and confer with counsel regarding case administration matters (0.6).	Del Castillo, Joshua	0.60	386.10	4,623.30	WO	HD	TR	_____
05/13/22	8846219	Review and analyze scheduling order; draft email to Judge MacKinnon's courtroom deputy regarding scheduling of mandatory settlement conference	Pham, Matt D.	0.10	41.40	4,664.70	WO	HD	TR	_____
05/25/22	8846281	Review and analyze client's documents for purposes of preparing discovery requests (0.6); Review and analyze client's accounting relating to Emmons Defendants (0.3); Review and analyze client's documents; continue drafting requests for admission (0.9); Continue drafting interrogatories to Defendant Emmons Trust (0.6)	Pham, Matt D.	2.40	993.60	5,658.30	WO	HD	TR	_____
05/26/22	8846289	Continue drafting interrogatories to Defendant Emmons Trust (0.7); Continue drafting interrogatories to Defendant Institute of Marketing and Management	Pham, Matt D.	2.70	1,117.80	6,776.10	WO	HD	TR	_____

08/03/22 17:15:25 PROFORMA STATEMENT FOR MATTER 378224.00022 (Winkler, Geoff/Receiver for Essex Capita) (Emmons Litigation)

Fees for Matter 378224.00022.(Emmons Litigation)

Trans Date	Index	Description of Service Rendered	Timekeeper	Hours	Fees	Sum	Circle	Action		
		(0.6); Review and analyze client's documents and accounting; continue preparing requests for admission (0.8); Continue drafting requests for production (0.6)								
05/30/22	8847428	Legal analysis in connection with Receiver's pending claims (1.0); attention to prospective discovery and summary judgment issues (1.5).	Del Castillo, Joshua	2.50	1,608.75	8,384.85	WO	HD	TR	_____
06/06/22	8878249	Telephone conferences and analysis re: settlement issues and strategy.	Farrell, Michael	0.30	230.85	8,615.70	WO	HD	TR	_____
06/11/22	8882764	Continue drafting two sets of interrogatories	Pham, Matt D.	0.60	248.40	8,864.10	WO	HD	TR	_____
06/20/22	8879661	Review and analysis of draft discovery and exchanged e-mails re: same.	Farrell, Michael	0.40	307.80	9,171.90	WO	HD	TR	_____
06/20/22	8882888	Continue drafting interrogatories to Emmons defendants (0.6); Continue drafting four sets of requests for production to defendants (0.8); Continue drafting two sets of requests for admission to Emmons Trust and Institute (1.9); Revise and finalize requests for admission, requests for production, interrogatories (0.4)	Pham, Matt D.	3.70	1,531.80	10,703.70	WO	HD	TR	_____
06/28/22	8877105	Initial review and analysis of meet and confer letter from opposing counsel and analysis re: response to same (.3); analysis and exchange of correspondence re: settlement conference scheduling (.2).	Farrell, Michael	0.50	384.75	11,088.45	WO	HD	TR	_____

08/03/22 17:15:25 PROFORMA STATEMENT FOR MATTER 378224.00022 (Winkler, Geoff/Receiver for Essex Capita) (Emmons Litigation)

Fees for Matter 378224.00022.(Emmons Litigation)

Trans Date	Index	Description of Service Rendered	Timekeeper	Hours	Fees	Sum	Circle	Action	
06/28/22	8883068	Draft email to opposing counsel regarding potential dates for mandatory settlement conference	Pham, Matt D.	0.10	41.40	11,129.85	WO	HD	TR
06/29/22	8882817	Review, analysis and exchange of e-mails re: settlement conference issues.	Farrell, Michael	0.30	230.85	11,360.70	WO	HD	TR
06/29/22	8883098	Draft emails to opposing counsel and Judge MacKinnon's courtroom deputy regarding scheduling mandatory settlement conference	Pham, Matt D.	0.20	82.80	11,443.50	WO	HD	TR
06/30/22	8883166	Begin drafting confidential settlement brief	Pham, Matt D.	0.40	165.60	11,609.10	WO	HD	TR

Proforma Summary

Timekeeper

Number	Timekeeper	Hours	Rate	Amounts
000313	Zaro, David	0.40	837.00	334.80
000739	Farrell, Michael	2.10	769.50	1,615.95
001842	Del Castillo, Joshua	3.30	643.50	2,123.55
002510	Pham, Matt D.	18.20	414.00	7,534.80
		<u>24.00</u>		<u>\$11,609.10</u>
Subtotal Fees				\$11,609.10
Discount				0.00
Total Fees				11,609.10
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

08/03/22 17:15:25 PROFORMA STATEMENT FOR MATTER 378224.00022 (Winkler, Geoff/Receiver for Essex Capita) (Emmons Litigation)

Billing Instructions

expires 6/30/2023: 10% off standard rates (automatic)

Account Summary – As Of 08/03/22

	Fiscal YTD			Calendar YTD			LTD		
	Total	Fees	Disb.	Total	Fees	Disb.	Total	Fees	Disbursements
Worked	22,763.70	22,763.70	0.00	37,376.10	37,376.10	0.00	38,799.00	38,799.00	0.00
Unbilled Adj	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00
Billed	0.00	0.00	0.00	1,422.90	1,422.90	0.00	1,422.90	1,422.90	0.00
Collected	0.00	0.00	0.00	1,422.90	1,422.90	0.00	1,422.90	1,422.90	0.00
AR Write Off	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00
	Total	Fees	Costs						
WIP	37,591.10	37,376.10	215.00						
Balance									
AR Balance	0.00	0.00	0.00						
Unalloc	0.00								
Payment									
Client Trust	0.00								
Balance									

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

08/03/22 17:15:26 PROFORMA STATEMENT FOR MATTER 378224.00023 (Winkler, Geoff/Receiver for Essex Capita) (McCloskey Litigation)

Preliminary Billing Form

Billing Atty: 001842 - Del Castillo, Matter #: 378224.00023 Client Name: Winkler, Geoff/Receiver for Essex Capita
 Joshua
 Date of Last Billing: 04/29/22 Matter Name: McCloskey Litigation
 Proforma Number: 1175209
 Client/Matter Joint Group # 378224-1 Client Matter Number:

Fees for Matter 378224.00023.(McCloskey Litigation)

Trans Date	Index	Description of Service Rendered	Timekeeper	Hours	Fees	Sum	Circle	Action		
04/12/22	8809842	Reviewed draft supplemental report and exchanged e-mails re: same.	Farrell, Michael	0.30	230.85	230.85	WO	HD	TR	_____
04/13/22	8810279	Conference and analysis re: case issues, deadlines and strategy.	Farrell, Michael	0.30	230.85	461.70	WO	HD	TR	_____
04/15/22	8810745	Reviewed materials re: party arguments and evidence (.5); analysis re: discovery strategy (.2).	Farrell, Michael	0.70	538.65	1,000.35	WO	HD	TR	_____
04/15/22	8813185	Begin drafting requests for production, interrogatories, and requests for admission	Pham, Matt D.	0.60	248.40	1,248.75	WO	HD	TR	_____
04/22/22	8813722	Analysis and review of materials re: potential discovery coordination with opposing counsel.	Farrell, Michael	0.20	153.90	1,402.65	WO	HD	TR	_____
04/25/22	8813871	Telephone conference with opposing counsel and analysis re: potential discovery coordination plan and strategy to address same.	Farrell, Michael	0.30	230.85	1,633.50	WO	HD	TR	_____
04/27/22	8813289	Compile and organize documents from client to be uploaded to Disco database	Pham, Matt D.	0.20	82.80	1,716.30	WO	HD	TR	_____

08/03/22 17:15:26 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		
05/02/22	8815843	Review documents and teleconference with counsel regarding prospective discovery demands and attention to issues regarding same (0.9).	Del Castillo, Joshua	0.90	579.15	2,295.45	WO	HD	TR	_____
05/02/22	8846122	Review and analyze client's documents for preparation of discovery requests (1.1); Begin drafting requests for production to Defendant McCloskey Trust (1.4)	Pham, Matt D.	2.50	1,035.00	3,330.45	WO	HD	TR	_____
05/03/22	8843937	Reviewed memorandum re: claim analysis (.2); analysis re: discovery issues (.2).	Farrell, Michael	0.40	307.80	3,638.25	WO	HD	TR	_____
05/03/22	8846138	Begin drafting requests for admission to Defendant McCloskey Trust (1.9); Begin drafting requests for admission to Defendant Cornerstone Holdings (1.6); Begin drafting interrogatories to Defendant McCloskey Trust (1.5); Begin drafting interrogatories to Defendant Cornerstone Holdings (0.9); Continue drafting requests for production to Defendant McCloskey Trust (0.6)	Pham, Matt D.	6.50	2,691.00	6,329.25	WO	HD	TR	_____
05/04/22	8843963	Telephone conference and analysis re: discovery issues and strategy (.4); review and analysis of discovery propounded to McCloskey (.7); review and analysis of Motion to Dismiss and opposition/reply papers and analysis re: potential effect on discovery and settlement strategy (.9); reviewed additional pleadings re: McCloskey positions/allegations (.4).	Farrell, Michael	2.40	1,846.80	8,176.05	WO	HD	TR	_____

08/03/22 17:15:26 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		
05/04/22	8846140	Continue drafting interrogatories to four Defendants (1.5); Continue drafting requests for admission to four Defendants (1.1); Continue drafting requests for admission to Defendants McCloskey Trust and Cornerstone Holdings (0.6); Continue drafting requests for production to four Defendants (1.5); Revise and finalize requests for admission, requests for production, and interrogatories (1.0)	Pham, Matt D.	5.70	2,359.80	10,535.85	WO	HD	TR	_____
05/05/22	8844017	Review and analysis of prior settlement correspondence from opposing counsel (.3); outlined issues and exchanged e-mails re: same (.4).	Farrell, Michael	0.70	538.65	11,074.50	WO	HD	TR	_____
05/06/22	8844038	Telephone conference with opposing counsel re: settlement issues and analysis re: same.	Farrell, Michael	0.20	153.90	11,228.40	WO	HD	TR	_____
05/13/22	8826521	Review pleadings, court orders, and case file and confer with counsel regarding case administration matters (0.6).	Del Castillo, Joshua	0.60	386.10	11,614.50	WO	HD	TR	_____
05/16/22	8828529	Review and respond to correspondence regarding mediation and mediation brief (0.5).	Del Castillo, Joshua	0.50	321.75	11,936.25	WO	HD	TR	_____
05/16/22	8846514	Review, analysis and exchange of e-mails with magistrate's office, counsel and client re: scheduling of settlement conference.	Farrell, Michael	0.40	307.80	12,244.05	WO	HD	TR	_____
05/17/22	8829683	Emails and confer with counsel regarding scheduled mandatory settlement conference and associated briefing requirements (1.1); legal analysis of	Del Castillo, Joshua	1.70	1,093.95	13,338.00	WO	HD	TR	_____

08/03/22 17:15:26 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		
		defendants' defenses (0.6).								
05/17/22	8846231	Draft email to John Hall regarding accounting	Pham, Matt D.	0.20	82.80	13,420.80	WO	HD	TR	_____
05/17/22	8846583	Reviewed correspondence from opposing counsel re: settlement conference issues and exchanged e-mails re: same (.4); conference, analysis and exchange of e-mails re: settlement conference brief and arguments/prep work for same (.8); drafted e-mail to client re: counsel's request and proposed response to same (.2).	Farrell, Michael	1.40	1,077.30	14,498.10	WO	HD	TR	_____
05/18/22	8831108	Emails regarding scheduled mandatory settlement conference and attention to issues regarding same (0.6).	Del Castillo, Joshua	0.60	386.10	14,884.20	WO	HD	TR	_____
05/18/22	8833825	Analysis of McCloskey settlement prospects, the issues related to pending motion, advice to counsel regarding strategy.	Zaro, David	0.40	334.80	15,219.00	WO	HD	TR	_____
05/18/22	8846678	Analysis and exchange of e-mails with client re: approach to settlement conference issue (.2); review, analysis and exchange of e-mails with M. Napoli and magistrate's office re: conference (.4); telephone conference, analysis and exchange of e-mails with M. Napoli re: meet and confer (.4); analysis and exchange of e-mails re: Napoli proposal and strategy to address same (.2).	Farrell, Michael	1.20	923.40	16,142.40	WO	HD	TR	_____
05/19/22	8832425	Additional analysis of McCloskey defenses and issues regarding settlement (0.5);	Del Castillo, Joshua	0.60	386.10	16,528.50	WO	HD	TR	_____

08/03/22 17:15:26 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		
		correspondence with M. Farrell regarding mandatory settlement conference (0.1).								
05/19/22	8846739	Review, analysis and exchange of e-mails with opposing counsel and others re: settlement conference issues and timing (.4); participation in team meeting and discussion of settlement issues and damages backup (.3).	Farrell, Michael	0.70	538.65	17,067.15	WO	HD	TR	_____
05/20/22	8834494	Review, analysis and exchange of various e-mails re: scheduling and settlement conference issues.	Farrell, Michael	0.40	307.80	17,374.95	WO	HD	TR	_____
05/20/22	8834581	Review and respond to correspondence from counsel, court, and Receiver regarding pending mandatory settlement conference (0.5).	Del Castillo, Joshua	0.50	321.75	17,696.70	WO	HD	TR	_____
05/21/22	8846258	Review and analyze John Hall's email and schedule relating to accounting	Pham, Matt D.	0.60	248.40	17,945.10	WO	HD	TR	_____
05/23/22	8836066	Prepare for and attend teleconference with Magistrate Judge MacKinnon regarding mandatory settlement conference (0.4).	Del Castillo, Joshua	0.40	257.40	18,202.50	WO	HD	TR	_____
05/23/22	8837513	Analysis and review of various e-mails re: conference with magistrate and timing/scheduling issues going forward.	Farrell, Michael	0.30	230.85	18,433.35	WO	HD	TR	_____
05/23/22	8846260	Phone conference with Judge MacKinnon regarding scheduling of mandatory settlement conference	Pham, Matt D.	0.20	82.80	18,516.15	WO	HD	TR	_____
05/24/22	8838222	Attention to case administration and mandatory settlement conference issues	Del Castillo, Joshua	0.50	321.75	18,837.90	WO	HD	TR	_____

08/03/22 17:15:26 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 (0.5).	Timekeeper	Hours	Fees	Sum	Circle	Action		
05/24/22	8846846	Review, analysis and exchange of e-mails re: settlement conference scheduling.	Farrell, Michael	0.40	307.80	19,145.70	WO	HD	TR	_____
05/25/22	8839520	Review and respond to correspondence regarding pending discovery and settlement matters (0.5); teleconferences regarding same (0.3).	Del Castillo, Joshua	0.80	514.80	19,660.50	WO	HD	TR	_____
05/25/22	8841630	Telephone conference and analysis re: transactions review and effect of same on damages issues (.4); analysis and review of e-mail from opposing counsel re: settlement conference issues (.2).	Farrell, Michael	0.60	461.70	20,122.20	WO	HD	TR	_____
05/25/22	8846284	Review and analyze John Hall's schedule and spreadsheet relating to accounting	Pham, Matt D.	1.30	538.20	20,660.40	WO	HD	TR	_____
05/26/22	8841069	Review documents and confer with counsel regarding disgorgement, discovery, and accounting issues (0.6).	Del Castillo, Joshua	0.60	386.10	21,046.50	WO	HD	TR	_____
05/26/22	8841534	Conference and analysis re: damages calculation efforts and settlement issues.	Farrell, Michael	0.30	230.85	21,277.35	WO	HD	TR	_____
05/27/22	8842718	Review accounting materials and confer with counsel regarding analysis of same (0.5).	Del Castillo, Joshua	0.50	321.75	21,599.10	WO	HD	TR	_____
05/30/22	8847436	Legal analysis in connection with Receiver's pending claims (1.0).	Del Castillo, Joshua	1.00	643.50	22,242.60	WO	HD	TR	_____
06/01/22	8850504	Review and respond to emails regarding scheduling mandatory settlement conference (0.2).	Del Castillo, Joshua	0.20	128.70	22,371.30	WO	HD	TR	_____

08/03/22 17:15:26 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		
06/01/22	8877187	Review, analysis and exchange of numerous e-mails with client and counsel re: settlement conference scheduling (.5); reviewed order re: same (.2).	Farrell, Michael	0.70	538.65	22,909.95	WO	HD	TR	_____
06/02/22	8851540	Review and respond to correspondence regarding scheduling mandatory settlement conference (0.5); review draft stipulation and confer regarding same (0.5)	Del Castillo, Joshua	1.00	643.50	23,553.45	WO	HD	TR	_____
06/02/22	8878024	Review, analysis and exchange of various e-mails re: settlement conference date and potential stipulation (.4); reviewed scheduling and settlement conference orders (.3); review and analysis of draft stipulation and exchanged various e-mails re: same (.4).	Farrell, Michael	1.10	846.45	24,399.90	WO	HD	TR	_____
06/03/22	8878156	Initial review and analysis of discovery responses served by McCloskey defendants and effect of same on case issues and strategy.	Farrell, Michael	0.90	692.55	25,092.45	WO	HD	TR	_____
06/06/22	8858988	Evaluate prior research/analysis of the McCloskey claim/defenses and advice to counsel related to discovery, defenses and mediation.	Zaro, David	0.60	502.20	25,594.65	WO	HD	TR	_____
06/06/22	8878239	Telephone conferences, analysis and review of prior correspondence re: party positions and settlement issues.	Farrell, Michael	0.80	615.60	26,210.25	WO	HD	TR	_____
06/08/22	8878406	Review and analysis of pertinent documents and outlining of issues for discovery/settlement.	Farrell, Michael	1.20	923.40	27,133.65	WO	HD	TR	_____

08/03/22 17:15:26 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		
06/10/22	8878505	Analysis re: upcoming settlement conference and arguments to be addressed at same (.4); analysis and exchange of e-mails re: brief preparation (.1).	Farrell, Michael	0.50	384.75	27,518.40	WO	HD	TR	_____
06/10/22	8882726	Review John Hall's email and spreadsheet regarding accounting (0.7); Phone call with John Hall regarding accounting (0.3); Begin drafting confidential settlement brief (1.3); Continue drafting confidential settlement brief (1.8)	Pham, Matt D.	4.10	1,697.40	29,215.80	WO	HD	TR	_____
06/12/22	8882767	Continue drafting confidential settlement brief - accounting schedule, discussion re accounting	Pham, Matt D.	2.70	1,117.80	30,333.60	WO	HD	TR	_____
06/13/22	8861334	Confer with counsel and review and revise draft mediation statement (0.9).	Del Castillo, Joshua	0.90	579.15	30,912.75	WO	HD	TR	_____
06/13/22	8862777	Conference and analysis re: settlement issues and strategy (.2); initial review and analysis of draft settlement conference statement (.3); analysis and exchange of e-mails with client re: settlement conference issues (.2).	Farrell, Michael	0.70	538.65	31,451.40	WO	HD	TR	_____
06/13/22	8882774	Continue drafting confidential settlement brief - discussion re transfers to defendants (1.7); Continue drafting confidential settlement brief - discussion re defendants being no different than other investors (1.8); Continue drafting confidential settlement brief - preliminary statement, discussion re settlement posture (2.1); Proofread and make revisions to confidential settlement	Pham, Matt D.	6.20	2,566.80	34,018.20	WO	HD	TR	_____

08/03/22 17:15:26 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		
06/14/22	8878649	Reviewed draft settlement conference statement and exchanged various e-mails re: same.	Farrell, Michael	0.90	692.55	34,710.75	WO	HD	TR	_____
06/14/22	8882820	Revise and finalize confidential settlement brief	Pham, Matt D.	0.30	124.20	34,834.95	WO	HD	TR	_____
06/20/22	8879668	Review and analysis of various materials re: settlement conference.	Farrell, Michael	1.10	846.45	35,681.40	WO	HD	TR	_____
06/21/22	8868863	Confer with M. Farrell and M. Pham in advance of mediation regarding critical arguments in favor of Receiver's accounting and settlement position (0.5).	Del Castillo, Joshua	0.50	321.75	36,003.15	WO	HD	TR	_____
06/21/22	8879758	Preparation for and participation in settlement conference, including conferences and review of various materials (3.2); conferences, analysis and exchange of various e-mails re: response to magistrate's proposal (.9).	Farrell, Michael	4.10	3,154.95	39,158.10	WO	HD	TR	_____
06/21/22	8882925	Prepare for mandatory settlement conference (0.4); Draft outline for Mike Farrell regarding relevant issues for use in mandatory settlement conference (0.5); Virtually attend mandatory settlement conference (2.3); Confer with Mike Farrell and Josh del Castillo regarding mediator's proposal (0.2)	Pham, Matt D.	3.40	1,407.60	40,565.70	WO	HD	TR	_____
06/22/22	8880540	Review, analysis and exchange of e-mails with magistrate's office re: rejection of proposal.	Farrell, Michael	0.20	153.90	40,719.60	WO	HD	TR	_____

08/03/22 17:15:26 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
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Disbursements for Matter 378224.00023 (McCloskey Litigation)

Trans Date	Index	Type	Quantity	Amt	WO	HD	TR
06/13/22	2772075	RSRCH – WestLaw	0.00	129.00			

Proforma Summary

Timekeeper

Number	Timekeeper	Hours	Rate	Amounts
000313	Zaro, David	1.00	837.00	837.00
000739	Farrell, Michael	23.40	769.50	18,006.30
001842	Del Castillo, Joshua	11.80	643.50	7,593.30
002510	Pham, Matt D.	34.50	414.00	14,283.00
		<u>70.70</u>		<u>\$40,719.60</u>
Subtotal Fees				\$40,719.60
Discount				0.00
Total Fees				40,719.60
Total Disbursements				129.00

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 6/30/2023: 10% off standard rates (automatic)

Account Summary – As Of 08/03/22

Fiscal YTD		Calendar YTD			LTD	
Total	Fees	Disb.	Total	Fees	Disb.	Total
						Fees Disbursements

08/03/22 17:15:26 PROFORMA STATEMENT FOR MATTER 378224.00023 (Winkler, Geoff/Receiver for Essex Capita) (McCloskey Litigation)

Worked	990.90	990.90	0.00	45,293.70	45,164.70	129.00	69,828.60	69,208.20	620.40
Unbilled Adj	0.00	0.00	0.00	0.00	0.00	0.00	529.20	529.20	0.00
Billed	0.00	0.00	0.00	24,005.70	23,514.30	491.40	23,514.30	23,514.30	491.40
Collected	0.00	0.00	0.00	24,005.70	23,514.30	491.40	24,005.70	23,514.30	491.40
AR Write Off	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00
	Total	Fees	Costs						
WIP Balance	45,293.70	45,164.70	129.00						
AR Balance	0.00	0.00	0.00						
Unalloc Payment	0.00								
Client Trust Balance	0.00								

Billing Address

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

EXHIBIT 3



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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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 to 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

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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

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E mpham@allenmatkins.com

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

EXHIBIT 4

4123 Lankershim Boulevard
North Hollywood, CA 91602



Geoff Winkler, JD, MBA, CFE, CIRA
Essex Capital Receivership
American Fiduciary Services LLC
715 NW Hoyt Street #4364
Portland, OR 97208

Invoice: 555212

Client ID: 3002270

Date: 06/13/2022

Due Date: 07/13/2022

For professional services rendered as follows:

DATE	SERVICE	STAFF	HOURS	AMOUNT
General Consulting Services				
11/30/2021	Discussions/Meetings Discuss returns with JC and BS.	NAS	1.00	
04/12/2022	Discussions/Meetings Discuss returns with JC.	NAS	0.50	
		Subtotal		645.00
Qualified Settlement Fund Services				
11/11/2021	Preparation Reviewed the additional information provided by the client, then worked on 2018 Tax Return.	BES	3.25	
11/12/2021	Preparation Discussed, then worked on 2018 Tax Return	BES	2.75	
11/12/2021	Preparation Preparation of 2018 tax return.	JAC	1.50	
11/24/2021	Preparation Preparation of 2018 1120.	JAC	1.50	
11/29/2021	Preparation Preparation of 2018 tax returns.	JAC	0.30	
11/30/2021	Preparation Call w/ Jessica and Nicholas to discuss Tax Return.	BES	0.50	
11/30/2021	Preparation Preparation of 2018 tax return.	JAC	2.50	
12/01/2021	Preparation Preparation of 2018 1120.	JAC	0.30	
12/09/2021	Preparation Gather information for Receivership tax returns.	JAC	0.10	

12/10/2021	Preparation Reviewed additional information PBC.	BES	2.25
04/04/2022	Preparation Preparation of QSF tax returns.	JAC	1.70
04/08/2022	Preparation Preparation and filing of Qualified Settlement Fund Income Tax Returns.	JAC	0.20
04/11/2022	Preparation Preparation of tax returns.	JAC	0.40
04/12/2022	Discussions/Meetings Telephone conversation w/ J. Hall re: receivership filings and obtaining unique TIN.	JAC	1.00
04/18/2022	Preparation Preparation of 2021 tax returns.	JAC	0.75
04/18/2022	Preparation Preparation of 2021 tax returns.	JAC	0.70
05/10/2022	Preparation Preparation of income tax returns.	JAC	4.30
05/11/2022	Preparation Preparation of 2018 tax returns.	BES	5.75
05/11/2022	Preparation Preparation of income tax returns.	JAC	0.70
05/12/2022	Preparation Preparation of 2018 Tax Return.	BES	2.25
05/13/2022	Preparation Preparation of 2018 tax returns.	BES	1.50
05/16/2022	Preparation Preparation of 2018 tax returns.	BES	2.25
05/17/2022	Preparation Preparation of 2018 tax returns. Compiled list of open items for 2019 tax returns.	BES	1.25
		Subtotal	7,091.00
		Total for Services	7,736.00

Invoice Total

\$7,736.00

PLEASE REMIT PAYMENT VIA WIRE TRANSFER OR CHECK
ACCORDING TO THE INSTRUCTIONS BELOW:
WIRE FUNDS TO:

CITY NATIONAL BANK
400 N. ROXBURY DRIVE, 5TH FLOOR
BEVERLY HILLS, CA 90210
ABA NUMBER 122016066 SWIFT CODE CINAUS6L
BENEFICIARY ACCOUNT NUMBER 113-238313
BENEFICIARY ACCOUNT NAME: MILLER KAPLAN ARASE LLP

MAKE CHECK PAYABLE TO:

MILLER KAPLAN ARASE LLP
4123 LANKERSHIM BLVD, NORTH HOLLYWOOD, CA 91602-2828

<u>06/13/2022</u>	<u>05/31/2022</u>	<u>04/30/2022</u>	<u>03/31/2022</u>	<u>02/28/2022+</u>	<u>Total</u>
7,736.00	0.00	0.00	0.00	1,933.50	\$9,669.50