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7 *Attorneys for Geoff Winkler Receiver*

8
9 **UNITED STATES DISTRICT COURT**

10 **DISTRICT OF NEVADA**

11 SECURITIES AND EXCHANGE
12 COMMISSION,

13 Plaintiff,

14 vs.

15 MATTHEW WADE BEASLEY *et al.*

16 Defendants;

17 THE JUDD IRREVOCABLE TRUST *et al.*

18 Relief Defendants.

Case No. 2:22-CV-00612-CDS-EJY

**AMENDED SECOND QUARTERLY
APPLICATION FOR PAYMENT OF
FEES AND REIMBURSEMENT OF
EXPENSES OF RECEIVER AND
RECEIVER'S COUNSEL
GREENBERG TRAUIG**

19
20 COMES NOW, Geoff Winkler, the Court-appointed Receiver (the "Receiver"), by and
21 through his counsel of record the law firm of Greenberg Traurig, LLP, and hereby submits this
22 Amended Second Quarterly Application for Payment of Fees and Reimbursement of Expense of
23 Receivers and Receiver's counsel Greenberg Traurig, LLP ("Application") for the period of July 1,
24 2022 through September 30, 2022.¹

25 This Amended Application incorporates by reference the Second Quarterly Applications
26 for Fees and Reimbursement of Expenses for Receiver and Receiver's Counsel Greenberg Traurig
27

28 ¹ A separate amended application was submitted by the law firms of Allen Matkins Leck Gamble Mallory & Natsis LLP and Semenza Kircher Rickard.

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1 (ECF No. 365) and addresses the concerns raised by the Court at the hearing on December 16,
2 2022.

3 By way of this Amended Application, the Receiver and Greenberg Traurig request the
4 Court's approval of 100% of their fees and expenses incurred during the Application Period and
5 further requests the interim payment of 80% of such fees and 100% of such expenses, to be paid
6 from the funds of the receivership estate established in the above-entitled action (the "Receivership
7 Estate" or "Estate"). Specifically, the amounts of the Amended Applicants' fees and expenses
8 sought to be approved and paid under this Fee Application are as follows:

<u>APPLICANT</u>	<u>TOTAL FEES</u>	<u>INTERIM PAYMENT REQUESTED (FEES)</u>	<u>EXPENSES</u>	<u>INTERIM PAYMENT REQUESTED (EXPENSES)</u>
Receiver/AFS	\$373,619.00	\$298,895.20	\$19,231.64	\$19,231.64
Greenberg Traurig	\$186,853.25	\$149,482.60	\$ 1,273.00	\$ 1,273.00
<u>TOTAL</u>	\$560,472.25	\$448,377.80	\$20,504.64	\$20,504.64

15 As referenced in the Second Application for fees, the amounts requested reflect
16 significantly discounted rates previously approved by the Court and, prior to the first submission,
17 the invoices submitted by the Receiver and his counsel went through a rigorous review process,
18 including review by counsel for the SEC.² At the Court's request, the Receiver and GT did an
19 additional review of the invoices submitted and have further decreased the amount requested by
20 eliminating any entries that might appear duplicative or administrative in nature, as detailed below.

21 **A. Receiver's Fees and Services as Amended.**

22 Per the Court's request, the Receiver conducted an additional review of the invoices
23 submitted to the Court. As a result of the same, American Fiduciary Services LLC ("AFS") has
24 deleted or reduced twenty-one (21) time entries that appeared to be duplicative or administrative
25 in nature. This reduction totaled 6.2 hours and \$1,504.00, which is further reflected in **Exhibit A**,
26 attached here. In addition, AFS corrected and/or clarified its expense report to update the payee
27

28 ² The review process employed internally by the Receiver and through the SEC is described in detail in the Amended Omnibus Motion for Payment of Fees submitted concurrently with this Amended Application.

1 information to ensure accuracy and added detail to include the applicable dates so the viewer can
 2 better understand the total number of days that the charge represents.³ The Receiver notes that he
 3 and his team are sensitive to the costs associated with travel and look at multiple options prior to
 4 making travel decisions as a matter of course. Such expenses are submitted to the Court only if
 5 consistent with SEC guidelines.

6 The Receiver reaffirms his commitment to efficiency in billing and to minimizing the
 7 administrative costs to the receivership estate arising from the expenses incurred in this matter and
 8 respectfully submits that the revisions and deletions addressed herein were made in good faith to
 9 address the issues raised by the Court at the December 16, 2022, hearing.

10 **B. Greenberg Traurig's Fees and Services as Amended.**

11 Per the Court's request, lead counsel for Greenberg Traurig ("GT") conducted an additional
 12 review of the invoices submitted to the Court. As a result of the same, the amount requested by
 13 GT was reduced by \$1,586.27. The reduction made related to deletion of time entries that could
 14 be construed as either clerical in nature or duplicative of entries of another timekeeper, as further
 15 reflected in **Exhibit B**, attached here.⁴ Notably, the review also ensured that time entries submitted
 16 were for tasks associated with matters that will assist the Receivership Estate.⁵ A review of GT's
 17 costs did not result in any reduction. The amount requested includes \$4.00 for parking expenses
 18 relating to a status hearing in this matter and expenses incurred for legal research.⁶

19 _____
 20 ³ Notably, the Court referenced entries relating to hotel expenses at the JW Marriott during the
 21 December 19, 2022 hearing. The expenses were actually for the Las Vegas Marriott and not the JW
 22 Marriott, and that error has been corrected. Additionally, as further detailed in the Amended Omnibus
 23 Motion to Approve Second Quarterly Applications for Fees and Reimbursement of Expenses for Receiver
 and Receiver's Counsel for the Period from July 1, 2022 through September 30, 2022 ("Motion") being
 filed contemporaneously, the Receiver's team complies with SEC travel guidelines for travel. In regard to
 hotel selection, the Receiver books hotels based on availability and costs. Hotel rates in Las Vegas fluctuate
 heavily based on season, conferences, and other events.

24 ⁴ This reduction includes 0.6 hours of Ms. Hendricks time, 2.5 hours of Mr. Hicks time, 0.8 hours of
 Mr. Spaulding's time and 0.8 hours of Ms. Ney's time. Further detail is provided in **Exhibit B**.

25 ⁵ Reference was made during the December 16, 2022 hearing regarding entries relating to communications
 26 with the U.S. Attorney's office. The time associated with such entries was related to work performed in
 conjunction with efforts to have assets seized by the FBI turned over to the Receiver and the Motion filed
 27 to facilitate the same. See ECF No. 319.

28 ⁶ As explained in the Omnibus Motion for Payment of Fees and Reimbursement of Costs filed concurrently,
 parking costs are specifically allowed in the SEC's Billing Instructions for Receivers in Civil Actions
 Commenced by the U.S. Securities and Exchange Commission.

1 GT reaffirms its commitment to efficiency in billing, and to minimizing the administrative
2 costs to the receivership estate arising from the expenses incurred in this matter and respectfully
3 submits that the revisions and deletions addressed herein were made in good faith and are intended
4 to address the issues raised by the Court at the December 16, 2022 hearing.

5 **C. Conclusion.**

6 For the foregoing reasons, the Receiver and Greenberg Traurig respectfully requests that
7 the Court enter an order:

- 8 1. Granting this Application in its entirety;
- 9 2. Approving the Receivers' fees and expenses incurred during the Application
10 Period, in the respective amounts of \$373,619 and \$19,231.64;
- 11 3. Authorizing the Receiver to pay AFS on an interim basis, eighty percent (80%) of
12 its approved fees incurred during the Application Period in the amount of \$298,895.20, and one
13 hundred percent (100%) of its approved expenses incurred during the Application Period, in the
14 amount of \$19,231.64, from the funds of the Receivership Estate;
- 15 4. Approving Greenberg Traurig's fees incurred during the Application Period, in the
16 amount of \$186,853.25 and costs in the amount of \$1,273.00;
- 17 5. Authorizing the Receiver to pay Greenberg Traurig on an interim basis, eighty
18 percent (80%) of its approved fees incurred during the Application Period in the amount of
19 \$149,482.60, and one hundred percent (100%) of its approved expenses incurred during the
20 Application Period, from the funds of the Receivership Estate; and
- 21 6. Providing such other and further relief as the Court deems just and proper.

22 DATED this 20th day of December 2022.

23 **GREENBERG TRAUIG, LLP**

24 By: /s/ Kara B. Hendricks
 25 KARA B. HENDRICKS, Bar No. 07743
 26 JASON K. HICKS, Bar No. 13149
 27 KYLE A. EWING, Bar No. 014051
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CERTIFICATE OF SERVICE

1
2 I hereby certify that, on the **20th day of December 2022**, a true and correct copy of the
3 foregoing **AMENDED SECOND QUARTERLY APPLICATION FOR PAYMENT OF**
4 **FEES AND REIMBURSEMENT OF EXPENSES OF RECEIVER AND RECEIVER'S**
5 **COUNSEL GREENBERG TRAURIG** was filed electronically via the Court's CM/ECF system.
6 Notice of filing will be served on all parties by operation of the Court's CM/ECF system, and
7 parties may access this filing through the Court's CM./ECF system.

8
9 /s/ Evelyn Escobar-Gaddi
An employee of GREENBERG TRAURIG, LLP

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INDEX OF EXHIBITS	
A	Detail of Reductions in Fees and Corrections/Clarifications of Expenses of AFS
B	Detail of Reductions in Fees of Greenberg Traurig, LLP

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EXHIBIT A

EXHIBIT A

AFS Detail of Reductions

AMERICAN FIDUCIARY SERVICES LLC -- GEOFF WINKLER, RECEIVER -- 3Q 2022 FEE APPLICATION

SECURITIES AND EXCHANGE COMMISSION v. J&J CONSULTING SERVICES, INC. ET AL. -- UNITED STATES DISTRICT COURT OF THE DISTRICT OF NEVADA -- CASE NO. 2-22-CV-00612

Professional	Description	Date	Hours	Rate	Amount	Activity	NEW HOURS	DESCRIPTION OF CHANGE	HOURS CHANGE	BILLING CHANGE
Amanda Deering	Editing call queue for investor calls.	7/5/2022	0.1	\$ 240.00	\$ 24.00	Legal - Case Administration	-	Deleted	-0.1	\$ (24.00)
Sam Parker	Downloading and reviewing case documents obtained from attorneys.	7/7/2022	2	\$ 180.00	\$ 360.00	Legal - Case Administration	1.5	Removed potential admin portion of billing.	-0.5	\$ (90.00)
Sam Parker	Downloading and organizing case files from AM.	7/7/2022	0.3	\$ 180.00	\$ 54.00	Legal - Case Administration	-	Deleted	-0.3	\$ (54.00)
Amanda Deering	Call between JPM and AMD regarding the organization of asset management, recovered assets, and outstanding items to complete to secure recovered assets.	7/8/2022	1	\$ 240.00	\$ 240.00	Legal - Asset Analysis and Recovery	0.8	Removed potential admin portion of billing.	-0.2	\$ (48.00)
Amanda Deering	Adding information on properties to folders on assets and reviewing emails from broker.	7/8/2022	0.2	\$ 240.00	\$ 48.00	Legal - Asset Analysis and Recovery	0.1	Removed potential admin portion of billing.	-0.1	\$ (24.00)
Amanda Deering	Reviewing and saving 1099s to case folder.	7/12/2022	0.2	\$ 240.00	\$ 48.00	Legal - Case Administration	0.1	Removed potential admin portion of billing.	-0.1	\$ (24.00)
Amanda Deering	Uploading and reviewing expense entries for last quarter.	7/13/2022	0.4	\$ 240.00	\$ 96.00	Legal - Case Administration	-	Deleted	-0.4	\$ (96.00)
Milana Barkhand	Reviewing, reconciling and uploading case expenses.	7/14/2022	2	\$ 280.00	\$ 560.00	Legal - Case Administration	1.7	Removed potential admin portion of billing.	-0.3	\$ (84.00)
Amanda Deering	Reviewing court docs and uploading to folder, inputting to agenda to review in next meeting.	7/19/2022	0.3	\$ 240.00	\$ 72.00	Legal - Case Administration	0.1	Removed potential admin portion of billing.	-0.1	\$ (24.00)
Amanda Deering	Call with real estate broker to ask questions, discuss potential properties and discuss next steps for sale. Email communication requesting information to assist in decision around broker and updating spreadsheets.	7/20/2022	0.5	\$ 240.00	\$ 120.00	Legal - Asset Disposition	0.3	Removed potential admin portion of billing.	-0.2	\$ (48.00)
Amanda Deering	Creating list serve, updating subscription to send mass email, reviewing and editing email with new additional court documents and adding new court filings and investor meeting information and widget to website.	7/29/2022	3	\$ 240.00	\$ 720.00	Legal - Case Administration	2.8	Removed potential admin portion of billing.	-0.2	\$ (48.00)

Amanda Deering	Communication with brokers, creating example listing agreement to share, setting up meeting with brokers, GBW.	8/3/2022	0.7	\$ 240.00	\$ 168.00	Legal - Case Administration	0.6	Removed potential admin portion of billing.	-0.1	\$ (24.00)
Amanda Deering	Call regarding transfer of assets, scheduling meeting, reviewing documentation and communication with GBW.	8/12/2022	0.5	\$ 240.00	\$ 120.00	Legal - Case Administration	0.4	Removed potential admin portion of billing.	-0.1	\$ (24.00)
Amanda Deering	Reviewing received documents, categorizing and creating digital warehouse, document warehousing, indexing and analysis activities.	8/16/2022	1.5	\$ 240.00	\$ 360.00	Legal - Case Administration	1.1	Removed potential admin portion of billing.	-0.4	\$ (96.00)
Amanda Deering	Updating website with new pleadings and reviewing.	8/17/2022	0.8	\$ 240.00	\$ 192.00	Legal - Case Administration	0.4	Removed potential admin portion of billing.	-0.4	\$ (96.00)
Milana Barkhand	Analyzing and editing unreadable detail of transactions for accounting file.	8/29/2022	2.5	\$ 280.00	\$ 700.00	Financial - Data Analysis	1.9	Removed potential admin portion of billing.	-0.6	\$ (168.00)
Milana Barkhand	Analyzing and editing unreadable detail of transactions for accounting file.	8/30/2022	3.2	\$ 280.00	\$ 896.00	Financial - Data Analysis	2.8	Removed potential admin portion of billing.	-0.4	\$ (112.00)
Amanda Deering	Updating task list with meeting notes, updating asset spreadsheets with updates from meeting, sending follow up email and planning.	8/31/2022	0.8	\$ 240.00	\$ 192.00	Legal - Case Administration	0.6	Removed potential admin portion of billing.	-0.2	\$ (48.00)
Amanda Deering	Drafting report and standardizing template for quarterly report and sharing for collaboration.	9/6/2022	0.5	\$ 240.00	\$ 120.00	Legal - Case Administration	0.3	Removed potential admin portion of billing.	-0.2	\$ (48.00)
Milana Barkhand	Downloading transactions from Stretto and emailing list to JPM.	9/7/2022	0.3	\$ 280.00	\$ 84.00	Financial - Data Analysis	-	Deleted	-0.3	\$ (84.00)
Amanda Deering	Reviewing documents.	9/30/2022	1.1	\$ 240.00	\$ 264.00	Legal - Case Administration	-	Deleted	-1	\$ (240.00)

TOTAL CHANGES	-6.2	-1,504.00
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SEC v. J&J Consulting Services, Inc. et al.
Summary of Expenses of Receiver and Retained Personnel
July 1, 2022 -September 30, 2022

Attachment 2

Incurred By	Payee	Item / Description	Date Incurred	Amount	Category
Geoff Winkler	Alaska Airlines	Airfare	7/1/2022	498.00	Airfare
Geoff Winkler	Alaska Airlines	Airfare	7/1/2022	480.57	Airfare
Josh McGraw	Alaska Airlines	Airfare	7/1/2022	498.00	Airfare
Geoff Winkler	Budget Car Rental	Car Rental (6/28-7/1)	7/1/2022	217.34	Car Rental
Geoff Winkler	Budget Car Rental	Car Rental - Fuel	7/1/2022	77.87	Car Rental
John Hall	Extra Space Storage	Storage rent proration	7/1/2022	73.50	Miscellaneous
Geoff Winkler	LV Marriott	Marriott Hotel (6/28-7/1)	7/1/2022	874.17	Hotel
John Hall	LV Marriott	Marriott Hotel (6/28-7/1)	7/1/2022	892.30	Hotel
Milana Barkhanoy	LV Marriott	Marriott Hotel (6/28-7/1)	7/1/2022	892.30	Hotel
Geoff Winkler	Per Diem	Per Diem Meals	7/1/2022	51.75	Individual Meals
John Hall	Per Diem	Per Diem Meals	7/1/2022	51.75	Individual Meals
Milana Barkhanoy	Per Diem	Per Diem Meals	7/1/2022	51.75	Individual Meals
John Hall	LV Marriott	Hotel (6/28-7/1)	7/1/2022	60.00	Parking
Geoff Winkler	Uber	Taxi	7/1/2022	16.46	Taxi
Geoff Winkler	Per Diem	Per Diem Meals	7/6/2022	55.50	Individual Meals
Josh McGraw	Per Diem	Per Diem Meals	7/6/2022	55.50	Individual Meals
Geoff Winkler	Budget Car Rental	Car Rental - Fuel	7/7/2022	45.30	Car Rental
Geoff Winkler	Budget Car Rental	Car Rental for SLT (7/6-7/7)	7/7/2022	123.17	Car Rental
Geoff Winkler	Aloft Hotel	Hotel for SLT (7/6-7/7)	7/7/2022	211.05	Hotel
Josh McGraw	Aloft Hotel	Hotel for SLT (7/6-7/7)	7/7/2022	211.05	Hotel
Geoff Winkler	Per Diem	Per Diem Meals	7/7/2022	55.50	Individual Meals
Josh McGraw	Per Diem	Per Diem Meals	7/7/2022	55.50	Individual Meals
Geoff Winkler	Port of Portland	Port of Portland Parking (7/6-7/7)	7/7/2022	45.00	Parking
Josh McGraw	Port of Portland	Port of Portland Parking (7/6-7/7)	7/7/2022	45.00	Parking
Geoff Winkler	Alaska Airlines	Airfare	7/8/2022	69.38	Airfare
Geoff Winkler	Per Diem	Per Diem Meals	7/10/2022	51.75	Individual Meals
Geoff Winkler	Per Diem	Per Diem Meals	7/11/2022	69.00	Individual Meals
Geoff Winkler	Power Locksmith	Locksmith to rekey 9 Sky Arc	7/11/2022	630.00	Miscellaneous
Geoff Winkler	Alaska Airlines	Airfare	7/12/2022	634.20	Airfare
Geoff Winkler	Budget Car Rental	Car Rental (7/10-7/12)	7/12/2022	185.78	Car Rental
Geoff Winkler	Budget Car Rental	Car Rental - Fuel	7/12/2022	20.89	Car Rental
Geoff Winkler	The English Hotel	Hotel (7/10-7/12)	7/12/2022	430.85	Hotel
Geoff Winkler	Per Diem	Per Diem Meals	7/12/2022	51.75	Individual Meals
Geoff Winkler	Port of Portland	Parking (7/10-7/12)	7/12/2022	60.00	Parking
Geoff Winkler	FedEx	Delivery services	7/18/2022	50.58	Courier/Shipping/Freight
Geoff Winkler	Per Diem	Per Diem Meals	7/24/2022	51.75	Individual Meals
Geoff Winkler	Per Diem	Per Diem Meals	7/25/2022	69.00	Individual Meals
Geoff Winkler	Uber	Taxi	7/25/2022	20.60	Taxi
Geoff Winkler	Uber	Taxi	7/25/2022	16.68	Taxi
Geoff Winkler	Uber	Taxi	7/25/2022	17.81	Taxi
Geoff Winkler	Per Diem	Per Diem Meals	7/26/2022	51.75	Individual Meals
Geoff Winkler	Port of Portland	Parking (7/24-7/26)	7/26/2022	63.00	Parking
Geoff Winkler	Uber	Taxi	7/26/2022	20.58	Taxi
Geoff Winkler	LV Marriott	Hotel (7/24-7/26)	7/27/2022	507.48	Hotel
Josh McGraw	PACER	Online research	7/28/2022	1.00	Miscellaneous
Geoff Winkler	GoDaddy	Email upgrade for noticing	7/29/2022	92.02	Miscellaneous
John Hall	Extra Space Storage	Storage rent proration	8/1/2022	73.50	Miscellaneous
Geoff Winkler	Alaska Airlines	Airfare	8/2/2022	397.19	Airfare
John Hall	Alaska Airlines	Airfare	8/2/2022	397.19	Airfare
Amanda Deering	Alaska Airlines	Airfare	8/4/2022	503.58	Airfare
Amanda Deering	Alaska Airlines	Airfare	8/4/2022	31.47	Airfare
Geoff Winkler	USPS	USPS Postage	8/19/2022	60.00	Courier/Shipping/Freight
Amanda Deering	Per Diem	Per Diem Meals	8/21/2022	51.75	Individual Meals
Geoff Winkler	Per Diem	Per Diem Meals	8/21/2022	51.75	Individual Meals
John Hall	Per Diem	Per Diem Meals	8/21/2022	51.75	Individual Meals
Amanda Deering	Uber	Taxi	8/21/2022	30.39	Taxi
Amanda Deering	Per Diem	Per Diem Meals	8/22/2022	51.75	Individual Meals
Amanda Deering	Alaska Airlines	Airfare	8/22/2022	225.63	Hotel
Geoff Winkler	Per Diem	Per Diem Meals	8/22/2022	69.00	Individual Meals
John Hall	Per Diem	Per Diem Meals	8/22/2022	69.00	Individual Meals
Amanda Deering	Uber	Taxi	8/22/2022	38.93	Taxi
Amanda Deering	Uber	Taxi	8/22/2022	9.89	Taxi
Amanda Deering	Uber	Taxi	8/22/2022	12.97	Taxi
Amanda Deering	Uber	Taxi	8/22/2022	20.95	Taxi
Amanda Deering	Uber	Taxi	8/22/2022	27.93	Taxi
Geoff Winkler	Per Diem	Per Diem Meals	8/23/2022	69.00	Individual Meals
John Hall	Per Diem	Per Diem Meals	8/23/2022	69.00	Individual Meals
John Hall	National Car Retnal	Car Rental (8/21-8/24)	8/24/2022	457.33	Car Rental
Geoff Winkler	LV Marriott	Hotel (8/21-8/24)	8/24/2022	1,098.76	Hotel
John Hall	LV Marriott	Hotel (8/22-8/24)	8/24/2022	523.44	Hotel
Geoff Winkler	Per Diem	Per Diem Meals	8/24/2022	51.75	Individual Meals
John Hall	Per Diem	Per Diem Meals	8/24/2022	51.75	Individual Meals
Geoff Winkler	Port of Portland	Parking (8/21-8/24)	8/24/2022	96.00	Parking
John Hall	Parking	Parking (8/22-8/24)	8/24/2022	40.00	Parking
John Hall	Extra Space Storage	Storage rent proration	9/1/2022	73.50	Miscellaneous
Amanda Deering	Maid Service	Cleaning for 9 Sky Arc (case expense)	9/2/2022	2,100.00	Miscellaneous
John Hall	Alaska Airlines	Airfare	9/6/2022	600.57	Airfare
Geoff Winkler	Per Diem	Per Diem Meals	9/6/2022	51.75	Individual Meals
John Hall	Per Diem	Per Diem Meals	9/6/2022	51.75	Individual Meals
Geoff Winkler	Per Diem	Per Diem Meals	9/7/2022	69.00	Individual Meals
John Hall	Per Diem	Per Diem Meals	9/7/2022	69.00	Individual Meals
John Hall	National Car Retnal	Car Rental (9/6-9/8)	9/8/2022	321.42	Car Rental
Geoff Winkler	LV Marriott	Hotel (9/6-9/8)	9/8/2022	396.84	Hotel
John Hall	LV Marriott	Hotel (9/6-9/8)	9/8/2022	337.88	Hotel

SEC v. J&J Consulting Services, Inc. et al.
 Summary of Expenses of Receiver and Retained Personnel
 July 1, 2022 -September 30, 2022

Attachment 2

Incurred By	Payee	Item / Description	Date Incurred	Amount	Category
Geoff Winkler	Per Diem	Per Diem Meals	9/8/2022	51.75	Individual Meals
John Hall	Per Diem	Per Diem Meals	9/8/2022	51.75	Individual Meals
Geoff Winkler	Port of Portland	Parking (9/6-9/8)	9/8/2022	72.00	Parking
John Hall	Port of Portland	Parking (9/6-9/8)	9/8/2022	40.00	Parking
John Hall	Uber	Taxi from PDX	9/10/2022	44.59	Taxi
Geoff Winkler	GoGo Internet	Internet access	9/13/2022	8.00	Miscellaneous
Josh McGraw	GoGo Internet	Internet access	9/14/2022	8.00	Miscellaneous
Milana Barkhanoy	GoGo Internet	Internet access	9/14/2022	8.00	Miscellaneous
Geoff Winkler	Alaska Airlines	Airfare	9/20/2022	17.99	Airfare
Geoff Winkler	Alaska Airlines	Airfare	9/20/2022	410.58	Airfare
Geoff Winkler	Amazon	Safe to store assets	9/21/2022	130.99	Miscellaneous
Geoff Winkler	International Registry	Title for plane (case expenses)	9/22/2022	800.00	Miscellaneous
Geoff Winkler	Delivery services	Delivery services	9/22/2022	9.45	Courier/Shipping/Freight
John Hall	PACER	Reimbursable PACER expenses	9/30/2022	71.00	Miscellaneous
Total				\$ 19,231.64	

	Geoff Winkler	John Hall	Amanda Deering	Milana Barkhanoy	Josh McGraw	Sam Parker	Total
Airfare	2,507.91	997.76	535.05	-	498.00	-	4,538.72
Car Rental	670.35	778.75	-	-	-	-	1,449.10
Courier/Shipping/Freigh	120.03	-	-	-	-	-	120.03
Fuel	-	-	-	-	-	-	-
Hotel	3,519.15	1,753.62	225.63	892.30	211.05	-	6,601.75
Individual Meals	921.75	465.75	103.50	51.75	111.00	-	1,653.75
Internet/Online Fees	-	-	-	-	-	-	-
Miscellaneous	1,661.01	291.50	2,100.00	8.00	9.00	-	4,069.51
Office Supplies	-	-	-	-	-	-	-
Parking	336.00	140.00	-	-	45.00	-	521.00
Personal Car Mileage	-	-	-	-	-	-	-
Printing/Photocopying/ Stationery	-	-	-	-	-	-	-
Taxi	92.13	44.59	141.06	-	-	-	277.78
Total	9,828.33	4,471.97	3,105.24	952.05	874.05	-	19,231.64

EXHIBIT B

EXHIBIT B

Greenberg Traurig Detail of Reductions

EXHIBIT B

**AMENDED SECOND QUARTERLY APPLICATION FOR PAYMENT OF FEES AND
REIMBURSEMENT OF EXPENSES OF RECEIVER AND RECEIVER'S COUNSEL
GREENBERG TRAURIG, LLP**

Per the Court's request, lead counsel for Greenberg Traurig ("GT") conducted an additional review of the invoices submitted to the Court. As a result of the same, the amount requested by GT was reduced by \$1,586.27. The reduction results from deletion of time entries that could be construed as either clerical or duplicative of entries of another time keeper.

This reduction includes: 0.6 hours of Ms. Hendricks time, 2.5 hours of Mr. Hicks time, 0.8 hours of Mr. Spaulding's time and 0.8 hours of Ms. Ney's time, as detailed below.

The following time entries were removed:

KARA HENDRICKS		
DATE	ENTRY	HOURS
07/18/22	Kara B. Hendricks Attention to correspondence from M. Cook regarding Murphy background and proposal regarding certain assets and information.	(0.2)
07/20/22	Kara B. Hendricks Attention to response to motion to amend/correct filed by the SEC and information referenced regarding assets held by new parties in anticipation of additional action required by receivers.	(0.3)
08/04/22	Kara B. Hendricks Circulate task list to team for coordination call.	(0.1)
JASON HICKS		
DATE	ENTRY	HOURS
07/06/22	Jason Hicks Review correspondence from Fabian VanCott -Judd-regarding Bahamas condominium.	(0.1)
07/06/22	Jason Hicks Review receivership team task list (status and action items) and assist with assets recovery plan.	(0.1)
07/06/22	Jason Hicks Review US Bank NA certified statement (ECF No 140).	(0.1)
07/11/22	Jason Hicks Review draft stipulation regarding living expenses as it concerns Humphries, CJ Investments and Jessica Humphries and strategize with receivership team and receiver regarding same.	(0.1)
07/21/22	Jason Hicks Review correspondence from Fabian VanCott regarding turnover/liquidation of Preston Judd home/proposed purchase and stipulated sales process.	(0.1)
07/21/22	Jason Hicks Review draft of opposition to Oberheiden (Judd) motion to retain earned fees and expenses.	(0.3)
07/31/22	Jason Hicks Review draft of Receiver's report to the court.	(0.5)

08/02/22	Jason Hicks Review correspondence from counsel and from SEC regarding proposed sale of 755 Pearl , Laguna Beach home (Jeffrey) and with receiver/receivership team re: mechanism for same.	(0.1)
08/03/22	Jason Hicks Review information concerning Larry Jeffery's account at Horizon Trust Co.	(0.1)
08/03/22	Jason Hicks Review draft stipulation and proposed order authorizing sale of Jeffery's home in Laguna Beach.	(0.1)
08/05/22	Jason Hicks Review correspondence re Fabian Vancott/Jeff Anderson (Judd) and coordination re turnover of remaining Judd properties	(0.1)
08/09/22	Jason Hicks Review court's order (ECF No 244) denying Madsen motion for reconsideration (ECF No 236)	(0.1)
08/09/22	Jason Hicks Review motion / order for Garrett Ogata to withdraw as counsel for Beasley (ECF 241).	(0.1)
09/09/22	Jason Hicks Review order on Seth Johnson's living expenses (ECF No 280).	(0.1)
09/09/22	Jason Hicks Review court's order approving first quarterly status report and petition for further instructions by receiver (ECF No 298).	(0.1)
09/13/22	Jason Hicks Review SEC's opposition to motion to intervene (ECF No 303).	(0.4)
CHRISTIAN SPAULDING		
08/08/22	Christian Spaulding Evaluate Masden's Emergency Motion for Reconsideration of (1) Order Amending Preliminary Injunction and Asset Freeze Order and (2) Order Amending Receivership Order.	(0.5)
08/26/22	Christian Spaulding Confer with K. Hendricks regarding the Ninth Circuit's holding in SEC v. Ross and its application to this case and the motions filed by Kamille Dean.	(0.3)
CYNTHIA NEY		
07/20/22	Cynthia L. Ney Compilation of materials for team's review.	(0.4)
07/25/22	Cynthia L. Ney Compile and forward materials to C. Spaulding for motion preparation.	(0.2)
07/29/22	Cynthia L. Ney Review recent court orders.	(0.2)