

EXHIBIT 2

EXHIBIT 2

Declaration of Kara B. Hendricks

GREENBERG TRAUERIG, LLP
10845 Griffith Peak Drive, Suite 600, Las Vegas, Nevada 89135
Telephone: (702) 792-3773 Facsimile: (702) 792-9002

1 KARA B. HENDRICKS, ESQ.
Nevada Bar No. 07743
2 JASON K. HICKS, ESQ.
Nevada Bar No. 13149
3 KYLE A. EWING, ESQ.
Nevada Bar No. 014051
4 **GREENBERG TRAUERIG, LLP**
10845 Griffith Peak Drive, Suite 600
5 Las Vegas, Nevada 89135
Telephone: (702) 792-3773
6 Facsimile: (702) 792-9002
Email: hendricksk@gtlaw.com
7 hicksja@gtlaw.com
8 ewingk@gtlaw.com

9 *Attorneys for Geoff Winkler, Receiver for*
10 *J&J Consulting Services, Inc., J&J Consulting Services, Inc.,*
J and J Purchasing LLC, The Judd Irrevocable Trust,
and BJ Holdings LLC

11 **IN THE UNITED STATES DISTRICT COURT**
12 **FOR THE DISTRICT OF NEVADA**

13 SECURITIES AND EXCHANGE
14 COMMISSION,

15 Plaintiff,

16 vs.

17 MATTHEW WADE BEASLEY; et al.,

18 Defendants,

19 THE JUDD IRREVOCABLE TRUST; et al.,

20 Relief Defendants.
21

CASE NO. 2:22-cv-00612-CDS-EJY

**DECLARATION OF KARA B.
HENDRICKS, ESQ. IN SUPPORT OF
THE RECEIVER'S THIRD
APPLICATION FOR ALLOWANCE
AND PAYMENT OF FEES AND COSTS
FOR THE PERIOD OCTOBER 1, 2022
THROUGH DECEMBER 31, 2022**

22 I, Kara B. Hendricks, Esq. declare as follows:

23 1. I am over 21 years old and an attorney with and partner of Greenberg Traurig LLP,
24 based in its Las Vegas, Nevada office. I am a licensed Nevada attorney.

25 2. By virtue of my position with Greenberg Traurig, I am competent to testify to the
26 matters presented in this declaration, and I submit this declaration in support of the Receiver's
27 application for approval of his fees and costs of his firm and those of his professionals in
28

///

GREENBERG TRAUERIG, LLP
10845 Griffith Peak Drive, Suite 600, Las Vegas, Nevada 89135
Telephone: (702) 792-3773 Facsimile: (702) 792-9002

1 connection with this matter. This declaration is based on my personal knowledge, except where
2 made on information and belief, and as to those matters, I believe them to be true.

3 3. Greenberg Traurig was retained by the Receiver in June 2022. The Receiver
4 selected Greenberg Traurig as one of two firms serving as general receivership counsel due to the
5 firm's litigation experience, receivership experience, and strong Nevada base.

6 4. Attached to this declaration as **Exhibit A** is a true and correct copy of the invoices
7 for the services of my firm for the period from October 1, 2022 through December 31, 2022 (the
8 “Application Period”).

9 5. As reflected in the attached invoices, and pursuant to the Receivership Order (ECF
10 No. 26) and the Order Authorizing Employment of Counsel (ECF No. 46), professionals at
11 Greenberg Traurig assisted the Receiver in: working with counsel for the numerous defendants
12 in this matter and the filing of an administrative motion on behalf of the Receiver; facilitating the
13 turnover of records and receivership assets; preparing various motions related to the recovery or
14 Receivership Assets including motions to compel concerning funds held by counsel for
15 defendants and for the turnover of certain vehicles; assisting with real estate matters; obtaining
16 an award of attorney’s fees incurred in moving to compel turnover of receivership funds; working
17 with professionals approved by the Court to facilitate the sale of real property and vehicles;
18 helping facilitate and participation in initial investor meeting; preparing subpoenas and following
19 up with third parties regarding items identified as potential receivership property; communicating
20 with the SEC and U.S. Attorney’s office regarding matters affecting the Receivership Estate;
21 analyzing documents and information provided relating to potential sale of business related items
22 invested in and/or owned by Defendants; and researching legal issues that impact the
23 Receivership Estate as identified and directed by the Receiver.

24 6. GT endeavored to staff each task efficiently, using a core team of attorneys and
25 utilizing associates and paralegal assistance where appropriate. Additionally, Greenberg Traurig
26 agreed to discount its standard billing rates for this matter by 15%. GT’s invoices for the
27 Application Period are attached hereto as **Exhibit A**.

28 ///

GREENBERG TRAURIG, LLP
10845 Griffith Peak Drive, Suite 600, Las Vegas, Nevada 89135
Telephone: (702) 792-3773 Facsimile: (702) 792-9002

1 7. I hereby certify that I have read the Third Application of Receiver and Receiver’s
2 Professional for Allowance and Payment of Fees and Costs for the Period from October 1, 2022
3 through December 31, 2022.

4 8. To the best of my knowledge, information and belief formed after reasonable
5 inquiry, the Application and all fees and expenses therein are true and accurate and comply with
6 the Billing Instructions for Receivers in Civil Actions commenced by the U.S. Securities and
7 Exchange Commission.

8 9. All fees contained in the Application are based on the rates listed in GT’s fee
9 schedule, subject to increases disclosed to the SEC and approved by the Court prior to any such
10 increase. All fees contained in the Application are reasonable, necessary and commensurate with
11 the skill and experience required for the activity performed and are subject to Court approval.
12 Additionally, efforts were taken to avoid duplication of efforts and to undertake required tasks in
13 as efficient manner as possible, utilizing personnel best suited to the task consistent with the
14 complexity of the tasks required with the goal of providing high quality work that benefits the
15 Receivership Estate.

16 10. GT has not included in the amount for which reimbursement is sought the
17 amortization of the cost of any investment, equipment, or capital outlay (except to the extent that
18 any such amortization is included within the permitted allowable amounts set forth herein for
19 photocopies and facsimile transmission).

20 11. In seeking reimbursement for a service which GT justifiably purchased or
21 contracted for from a third party (such as copying, imaging, bulk mail, messenger service,
22 overnight courier, computerized research, or title and lien searches), GT requests reimbursement
23 only for the amount billed to GT by the third-party vendor and paid by GT to such vendor. If such
24 services are performed by the Receiver or the Receiver’s retained personnel, the Receiver or the
25 retained personnel, as appropriate, will certify that it is not making a profit on such reimbursable
26 service.

27 12. GT respectfully requests that the Court approve the fees and costs reflected in the
28 prebills and approve payment in the amounts reflected in the Third Application.

1 I declare under penalty of perjury under the laws of the State of Nevada that the foregoing
2 is true and correct

3 Executed on February 15, 2023.

4 */s/ Kara B. Hendricks*

KARA B. HENDRICKS, ESQ.

5 Declarant
6
7
8
9
10
11
12
13
14
15
16
17
18
19
20
21
22
23
24
25
26
27
28

EXHIBIT A

EXHIBIT A

Greenberg Traurig Invoices



Invoice No. : 1000224348
File No. : 209375.010100
Bill Date : February 14, 2023

Geoff Winkler
715 NW Hoyt Street, Suite 4364
Portland, OR 97208

Attn: Geoff Winkler

INVOICE

Re: SEC v. Beasley (Geoff Winkler, Receiver)

THIS INVOICE REPLACES INVOICE 1000150214

Total Fees: \$ 73,224.57

Expenses:

Other Charges 144.00
Subpoenas 252.00
Information and Research 63.00

Total Expenses: \$ 459.00

Current Invoice: \$ **73,683.57**

Previous Balance (see attached statement): \$ 160,880.68

Total Amount Due: \$ **234,564.25**

KBH:LC
Tax ID: 13-3613083



Invoice No. : 1000224348
File No. : 209375.010100

REMITTANCE ADVICE

PLEASE RETURN WITH YOUR PAYMENT
Note: Payment is Due 30 Days from Date of Invoice

CLIENT NAME: WINKLER, GEOFF
FILE NUMBER: 209375.010100
INVOICE NUMBER: 1000224348*
BILLING PROFESSIONAL: Kara B. Hendricks

Current Invoice:	\$	73,683.57
Previous Balance:	\$	160,880.68
Total Amount Due:	\$	234,564.25

FOR YOUR CONVENIENCE, WIRE TRANSFER FUNDS TO:

For Wire Instructions:

Bank: WELLS FARGO BANK
ABA #: 121000248

For ACH Instructions:

Bank: WELLS FARGO BANK
ABA#: 063107513

CREDIT TO: GREENBERG TRAUIG DEPOSITORY ACCOUNT
ACCOUNT #: 2000014648663

PLEASE

REFERENCE: CLIENT NAME: WINKLER, GEOFF
FILE NUMBER: 209375.010100
INVOICE NUMBER: 1000224348*
BILLING
PROFESSIONAL: Kara B. Hendricks

IF YOU WISH TO PAY BY CHECK PLEASE REMIT TO THE ADDRESS BELOW:

**Greenberg Traurig
PO Box 936769
ATLANTA GA 31193-6769**

Wire fees may be assessed by your bank.

*** If paying more than one invoice, please reference all invoice numbers in wiring instructions.**

KBH:LC
Tax ID: 13-3613083



Invoice No. : 1000224348
File No. : 209375.010100

Please contact acct-cashreceipts@gtlaw.com for any payment related questions.

KBH:LC

Tax ID: 13-3613083



Invoice No. : 1000224348
 File No. : 209375.010100

Account Statement

<u>Date</u>	<u>Invoice #</u>	<u>Fees Due</u>	<u>Expenses Due</u>	<u>Other Due</u>	<u>Total Due</u>
07/19/22	1000035547	16,627.52	0.00	0.00	16,627.52
10/03/22	1000096060	12,029.69	0.00	0.00	12,029.69
11/09/22	1000142381	16,674.86	0.00	0.00	16,674.86
11/09/22	1000142507	8,666.16	0.00	0.00	8,666.16
12/09/22	1000166978	61,032.86	389.93	0.00	61,422.79
02/10/23	1000219800	44,878.73	580.93	0.00	45,459.66
	Totals:	\$ 159,909.82	\$ 970.86	\$ 0.00	\$ 160,880.68

KBH:LC

Tax ID: 13-3613083

Description of Professional Services Rendered:

TASK CODE: GW001 ASSET ANALYSIS AND RECOVERY

<u>DATE</u>	<u>TIMEKEEPER</u>	<u>DESCRIPTION</u>	<u>HOURS</u>	<u>AMOUNT</u>
10/03/22	Kyle Ewing	Telephonic communication with M. Enriquez (in-house counsel) of Keller Williams re: D. Seybert's interest in K-W franchises and potential sale of the same; conference with K. Hendricks re: the same; follow-up with M. Enriquez.	0.50	170.00
10/03/22	Kara B. Hendricks	Respond to email from J. Giardino re: C. Madsen.	0.10	48.02
10/03/22	Kara B. Hendricks	Prepare email to A. Grsiby and provide copy of prior correspondence and list of information repeatedly requested by the Receiver which has not been received.	0.50	240.12
10/03/22	Kara B. Hendricks	Attention to issue regarding inquiry regarding vendor fees paid by counsel for Defendants and follow-up with G. Winkler and J. del Castillo regarding same.	0.50	240.12
10/03/22	Kara B. Hendricks	Review order denying motion for release of funds in detail and provide wire instructions to Humphries counsel to facilitate transfer of funds.	0.70	336.17
10/03/22	Kara B. Hendricks	Review email and information from A. Chisnall regarding GoldWynn condo and judge contract (.3); Update G. Winkler and provide background regarding enforcement in Bahamas (.1).	0.40	192.10
10/03/22	Kara B. Hendricks	Follow-up regarding concerns with Bahama collections and position stated in recent emails.	0.60	288.15
10/03/22	Kara B. Hendricks	Attention to O'Toole letter regarding R. Madsen fees issues and prepare response to same including clarifying record and reference to orders from Judge Silva.	0.90	432.22
10/03/22	Kara B. Hendricks	Telephone call from K. Ewing regarding discussion with M. Enrique regarding Seybert deal (.2); Follow-up with A. Deering regarding same (.1).	0.30	144.07
10/03/22	Cynthia L. Ney	Review dockets and obtain opinions in JP Morgan 8th Circuit appellate decisions (.5); forward same to K.Hendricks (.1).	0.60	105.00
10/03/22	Christian Spaulding	Confer with K. Hendrick regarding application of receivership order to additional areas of receivership funds, agreement for utah tenant to remain in house, and bahamas condo matters.	0.30	95.62
10/03/22	Christian Spaulding	Revise correspondence to counsel for R. Madsen regarding turnover of funds held to include analysis and distinguishment of	1.10	350.62

		case upon which they rely.		
10/03/22	Christian Spaulding	Evaluate documents provided by counsel for Goldwynn Bahamas related to Judd's purchase of Unit 214 at the Goldwynn Bahamas.	1.20	382.50
10/04/22	Kyle Ewing	Conference with K. Hendricks re: Christiansen Trial Attorneys' request to retain receivership funds in their trust account to pay vendor invoices.	0.20	68.00
10/04/22	Kyle Ewing	Follow-up email communication re: Seybert Keller Williams franchises with M. Enriquez (in-house counsel) of Keller Williams and A. Deering (AFS).	0.10	34.00
10/04/22	Kara B. Hendricks	Correspond with C. Fronk via email regarding Rosegreen and Seybert inquiries.	0.10	48.02
10/04/22	Kara B. Hendricks	Revise demand letters to counsel for Jager, Jefferies and R. Madsen and add citations to Judge Silva fee order.	0.70	336.17
10/04/22	Kara B. Hendricks	Respond to email from K. Perdue regarding funds held by Christiansen Trial Lawyers.	0.10	48.02
10/04/22	Kara B. Hendricks	Call with J. Giardino and G. Winkler regarding C. Madsen investor list, payment to attorneys, communication with SEC, and related issues.	0.50	240.12
10/04/22	Kara B. Hendricks	Participate in call with G. Winkler, A. Deering, J. delCastino, D. Zaro and provide update regarding asset collection efforts including new informations regarding vehciles, attorneys fees, and property developments and discussion regarding bank account and related proceedings.	1.10	528.27
10/04/22	Kara B. Hendricks	Attention to email and materials provided by A. Deering regarding Seybert purchase evaluation.	0.10	48.02
10/04/22	Kara B. Hendricks	Telephone call with M. Cook regarding Mark Murphy, fees, state court proceeding and stipulation.	0.30	144.07
10/04/22	Kara B. Hendricks	Attention to emails and additional information from C. SPaulding regarding Goldwynn condo, Hurricane property, and credit card research and follow-up regarding next steps.	0.50	240.12
10/04/22	Kara B. Hendricks	Review and revise proposed addendum to Hurricane lease and follow-up with C. Spaulding regarding same.	0.40	192.10
10/04/22	Kara B. Hendricks	Follow-up with K. Ewing regarding communication relating to Seybert sale and analysis regarding issues relating to return of fees.	0.30	144.07
10/04/22	Kara B. Hendricks	Provide B. Tranquillo additional background information regarding asset freeze and related deadlines impact vehicle recovery issues.	0.20	96.05
10/04/22	Kara B. Hendricks	Call with C. Fronk and G. Winkler regarding requests by Seybert, Rosegreen, Madsen and Murphy.	0.70	336.17
10/04/22	Kara B. Hendricks	Attention to Desert Behavior documents	0.60	288.15

10/04/22	Cynthia L. Ney	including purchase, operating agreement and assignments and begin preparation of letter to M. Levin discussing concerns. Editing of various letters to counsel in response to request for funds paid by defendants.	0.40	70.00
10/04/22	Christian Spaulding	Evaluate applicable authority regarding recoverability of funds paid by credit card. Draft summary of the same for K. Hendricks.	1.90	605.62
10/04/22	Christian Spaulding	Draft addendum to lease agreement regarding agreement by Receiver to allow tenants to remain in Hurricane Utah property.	2.10	669.37
10/04/22	Christian Spaulding	Revise agreement regarding rental of Hurricane Utah property per comments from K. Hendricks.	0.40	127.50
10/05/22	Kara B. Hendricks	Review emails regarding Bahamian counsel leads and follow-up with C. Spaulding regarding evaluating next steps.	0.30	144.07
10/05/22	Kara B. Hendricks	Finalizing correspondence to counsel for R. Madsen, L. Jeffrey and S. Jager regarding fee return.	0.40	192.10
10/05/22	Kara B. Hendricks	Telephone call to L. Maningo regarding Seybert sale.	0.10	48.02
10/05/22	Kara B. Hendricks	Video conference with M. Enriquez regarding sale of Seybert franchise.	0.30	144.07
10/05/22	Kara B. Hendricks	Correspond via email with B. Tranquillo regarding information on Ferrari and list of cars where duplicate title was requested.	0.10	48.02
10/05/22	Kara B. Hendricks	Participate in video conference with G. Winkler, A. Deering and M. Levin regarding GDBH offer and debrief with G. Winkler regarding same.	0.60	288.15
10/05/22	Kara B. Hendricks	Telephone call to J. Erickson regarding purchase of Keller Williams franchise with Seybert ownership interest (.4); Update G. Winkler (.2); Email L. Maningo to discuss next steps (.1).	0.70	336.17
10/05/22	Kara B. Hendricks	Attention to emails from J. Crain at Christiansen law regarding transfer of funds held in trust for Humphries to Receiver and provide G. Winkler regarding representations made in filings regarding amounts.	0.20	96.05
10/05/22	Cynthia L. Ney	Finalize letters to various attorneys regarding responses to demand for attorney funds provided by defendants and forward same to counsel (.6); communications with K.Hendricks regarding same (.1).	0.70	122.50
10/05/22	Cynthia L. Ney	Review various email communications and compile/forward materials requested by Josh.	0.60	105.00
10/05/22	Christian Spaulding	Correspondence with attorneys in firm regarding experience proceeding in Bahamas.	0.40	127.50
10/05/22	Christian Spaulding	Emails with S. Moree, attorney from	0.20	63.75

		Bahamas to schedule meeting to discuss options for enforcing orders in Bahamas and matters related to Judd's purchase of condominium in Nassau.		
10/05/22	Christian Spaulding	Evaluate status of Judd condominium in Bahamas including status of development and inquiry as to whether unit at issue had been listed for sale.	0.70	223.12
10/06/22	Kara B. Hendricks	Telephone call with L. Maningo and discuss purchase of Keller Williams brokerage franchise with D. Seybert interest.	0.20	96.05
10/06/22	Kara B. Hendricks	Attention to email from D. Huish regarding Tanner payments to church and house to be sold with funds provided to Receiver.	0.30	144.07
10/06/22	Kara B. Hendricks	Review updated Hurricane lease addendum and forward to A. Deering.	0.10	48.02
10/06/22	Kara B. Hendricks	Respond to email from R. Willisamson regarding La Canasta Furnishings and Beasley Tahoe property.	0.10	48.02
10/06/22	Kara B. Hendricks	Attention to emails from L. Maningo regarding Seybert and follow-up.	0.10	48.02
10/06/22	Kara B. Hendricks	Confer with G. Winkler and A. Deering regarding next steps for new property identified by D. Huish, sell of vehicles and positions taken by counsel regarding fees.	0.30	144.07
10/06/22	Kara B. Hendricks	Update from C. Spaulding regarding discussion with counsel in the Bahamas regarding proceeding relating to Judd Condo (.3); Review updated from G. Winkler regarding Judd communication regarding condo and follow-up regarding additional information needed (.1).	0.40	192.10
10/06/22	Kara B. Hendricks	Attention to emails regarding pick-up of car titles.	0.10	48.02
10/06/22	Kara B. Hendricks	Attention to documents and information provided by K. Christensen in advance of call to discuss his client concerns.	0.40	192.10
10/06/22	Kara B. Hendricks	Telephone call with W. Schuller regarding Andre Nelms subpoena and review same (.3); Update G. Winkler (.1); Review documents produced by Vegas Valley Auto regarding Nelms (.3).	0.60	288.15
10/06/22	Kara B. Hendricks	Participate in call with G. Winkler and attorney K. Christiansen to address concerns.	0.50	240.12
10/06/22	Kara B. Hendricks	Respond to email from J. Crain and confirm receipt of wire transfer from Christiansen Trial Lawyers.	0.10	48.02
10/06/22	Kara B. Hendricks	Attention to emails and letters from D. Clukey regarding funds received from S. Johnson and C. Rhoner including providing wire instructions for \$20k from tainted account and follow-up with G. Winkler regarding additional information provided in correspondence.	0.50	240.12
10/06/22	Cynthia L. Ney	Analysis and organization of financial	0.60	105.00

		records of defendants (.5); communications with Kara Hendricks regarding same (.1).		
10/06/22	Cynthia L. Ney	Compile and forward of additional materials to J.McGraw.	0.20	35.00
10/06/22	Christian Spaulding	Revise and finalize draft of addendum to standard lease agreement per comments from client.	0.40	127.50
10/06/22	Christian Spaulding	Call with Sean Moree, Bahamian attorney regarding options and strategy related to Goldwynn condos.	0.60	191.25
10/07/22	Kyle Ewing	Review documents provided by A. Nelms in connection with his purchase of P. Beasley's Mercedes G-Wagon from Beasley/Grisby.	0.30	102.00
10/07/22	Kara B. Hendricks	Correspond with email with R. Williamson regarding Beasley Tahoe house.	0.10	48.02
10/07/22	Kara B. Hendricks	Follow-up with B. Schuller to arrange for car inspection.	0.20	96.05
10/07/22	Kara B. Hendricks	Meet with W. Schueller and A. Nelms to discuss subpoena and purchase of G. Wagon (.7); Review documents provided via subpoena, research new issues and confer with G. Winker and B. Tranquillo regarding G. Wagon and next steps (1.5); Follow-up via phone and email with W. Schueller regarding additional request sets (.2).	2.40	1,152.60
10/07/22	Kara B. Hendricks	Review correspondence from R. Goodman regarding engagement fees.	0.20	96.05
10/07/22	Kara B. Hendricks	Review correspondence from A. Grisby relating to sold vehicles.	0.10	48.02
10/07/22	Kara B. Hendricks	Attention to emails regarding offer to purchase GDBC property and correspond with G. Winkler and A. Deering regarding same.	0.20	96.05
10/07/22	Kara B. Hendricks	Attention to background information on N. Nelms and M. Thomas.	0.40	192.10
10/07/22	Kara B. Hendricks	Attention to information from S. Moree regarding proceeding in Bahamas for Judd condo refund and follow-up with G. Winkler regarding next steps.	0.20	96.05
10/07/22	Kara B. Hendricks	Attention to email regarding duplicate titles and request C. Spaulding research validity of same and impact on sale.	0.20	96.05
10/07/22	Kara B. Hendricks	Telephone call with D. Hollingsworth regarding pending turnover motion and update G. Winkler regarding same.	0.30	144.07
10/07/22	Kara B. Hendricks	Attention to emails from A. Deering regarding sale of vehicles and communication with J. Humphries.	0.10	48.02
10/07/22	Christian Spaulding	Meeting with Andre Nelms and counsel regarding background of acquisition of Mercedes Benz G-Wagon. Confer with team regarding the same.	1.50	478.12
10/07/22	Christian Spaulding	Evaluate NRS provisions regarding affect of duplicate title on original title with respect to transfer of vehicles.	0.70	223.12

10/10/22	Kara B. Hendricks	Review email and follow-up call to W. Schuller regarding A. Nelms (.2); Update G. Winkler and discuss transition of texts and photos (.1).	0.30	144.07
10/10/22	Kara B. Hendricks	Attention to emails with S. Jager regarding GDBH offer.	0.10	48.02
10/10/22	Christian Spaulding	Confer with team regarding subpoena to be issued to the NV DMV and service related to the same.	0.30	95.62
10/11/22	Kyle Ewing	Conference with G. Winkler, B. Tranquilo (vehicle expert), and K. Hendricks (GT) re: A. Nelms' purported purchase of Beasley Mercedes G Wagon.	0.20	68.00
10/11/22	Kara B. Hendricks	Correspond via email with J. Jongeward regarding records and reports regarding investments.	0.20	96.05
10/11/22	Kara B. Hendricks	Attention to emails and additional information from B. Tanquillo regarding vehicles believed to be receivership property and request C. Ney and C. Spaulding assistance with preparing DMV subpoena to obtain additional information.	0.20	96.05
10/11/22	Kara B. Hendricks	Meet with G. Winkler and B. Tranquillo to discuss G-Wagon issues (before and after viewing of same).	1.10	528.27
10/11/22	Kara B. Hendricks	Telephone call from D. Hollingsworth regarding turnover motion and review and respond to email regarding same (.2); Follow-up with G. Winkler regarding stipulation (.2); Email T. Combs and C. Fronk regarding proposed stipulation (.2).	0.60	288.67
10/11/22	Kara B. Hendricks	Follow-up with J. Giardino to obtain additional investor contact information and source documents utilized in summary provided.	0.20	96.05
10/11/22	Kara B. Hendricks	Correspond with C. Ney regarding assistance with tracking response to fee demands and subpoena compliance issues.	0.20	96.05
10/11/22	Kara B. Hendricks	Prepare email to L. Maningo follow-up regarding Seybert proposed sale of franchise and additional information needed regarding W. Rosegreen stipulation requests.	0.40	192.10
10/11/22	Kara B. Hendricks	Telephone call with J. delCastillo regarding filing of upcoming motions and documents needed to facilitate sale of airplane.	0.30	144.07
10/11/22	Kara B. Hendricks	Telephone call to B. Schuller regarding G-Wagon and send follow-up email.	0.30	144.07
10/11/22	Kara B. Hendricks	Attention to emails from A. Deering regarding C. Madsen information.	0.10	48.02
10/11/22	Cynthia L. Ney	Call to NV DMV regarding subpoena process (.2); prepare required application for records and affidavit (.4).	0.60	105.00
10/12/22	Kara B. Hendricks	Attention to emails regarding airplane delivery and finalizing sale process.	0.10	48.02
10/12/22	Kara B. Hendricks	Correspond via email from D. Hollingsworth regarding turnover motion,	0.10	48.02

10/12/22	Kara B. Hendricks	stipulation and extension. Telephone call with G. Winkler regarding discuss with A. Grisby and motion to compel and follow-up with C. Spaulding regarding brief.	0.50	240.12
10/12/22	Kara B. Hendricks	Telephone call with R. Williams (counsel for lender) regarding Beasley Tahoe property and next steps.	0.30	144.07
10/12/22	Kara B. Hendricks	Correspond with J. Giardino regarding information need from C. Madsen.	0.10	48.02
10/12/22	Kara B. Hendricks	Follow-up with G. Winkler regarding meeting with Aaron Grisby and motion to compel.	0.10	48.02
10/12/22	Kara B. Hendricks	Prepare second addendum to GDBH operating agreement to address issues with sale of land and ability to move forward and discuss next steps with G. Winkler.	2.20	1,056.55
10/12/22	Kara B. Hendricks	Correspond via email with G. Winkler regarding turnover motion and information provided by US Attorneys office.	0.20	96.05
10/12/22	Kara B. Hendricks	Respond to email from R. Behle regarding proposed stipulation.	0.10	48.02
10/12/22	Kara B. Hendricks	Telephone call with D. Hollingsworth regarding turnover motion (.1); Review emails and draft of unopposed motion for extension of time to respond to turnover and follow-up regarding same (.2).	0.30	144.07
10/12/22	Kara B. Hendricks	Attention to emails regarding transfer of funds from Jackson White for S. Johnson and C. Rhoner.	0.20	96.05
10/12/22	Cynthia L. Ney	Prepare subpoena and document requests and forwarding of same to K.Hendricks.	0.50	87.50
10/13/22	Kara B. Hendricks	Prepare detailed email with updated information regarding asset recovery efforts and pending matters and send to GT team for further discussion with broader receivership team.	0.60	288.15
10/13/22	Kara B. Hendricks	Telephone call with B. Schuller regarding G-Wagon and Nelms position regarding same.	0.20	96.05
10/13/22	Kara B. Hendricks	Attention to draft subpoena and revise DMV application and follow-up with C. Ney to finalize same.	0.30	144.07
10/13/22	Kara B. Hendricks	Review court orders regarding Mark Murphy stipulation, US bank stipulation, and US Attorney request for additional time to respond to motion for turnover.	0.30	144.07
10/13/22	Kara B. Hendricks	Attend status hearing and de brief with G. Winkler, T. Combs, and C. Fronk.	2.20	1,056.55
10/13/22	Kara B. Hendricks	Attention to outline for motion for fraudulent transfer and turnover of G-Wagon and request C. Spauldings assistance with preparation of same.	0.50	240.12
10/13/22	Kara B. Hendricks	Review bank account statements from L. Jeffrey and follow-up regarding large transfer and payment to Receiver for house sale proceeds (.3); Discuss with G. Winkler	0.40	192.10

		(.1).		
10/13/22	Kara B. Hendricks	Correspond via email with A. Deering regarding Doterra account and additional follow-up needed regarding co-mingling of funds.	0.20	96.05
10/13/22	Kara B. Hendricks	Prepare litigation summary of inclusion in status report and correspond with A. Deering regarding same.	0.70	336.17
10/13/22	Kara B. Hendricks	Discuss Grisby motion to compel with G. Winkler (.2); Follow-up with C. Spaulding regarding preparation of motion and additional information to include based on recent events (.2).	0.40	192.10
10/13/22	Cynthia L. Ney	Review and editing of subpoena and application required directed to Nevada Department of Motor Vehicles requesting information on specific Defendant's vehicles (.7); call to DMV regarding same (.2); communications with . Hendricks regarding same (.1).	1.00	175.00
10/13/22	Christian Spaulding	Confer with K. Hendricks regarding status of vehicle in possession by A. Nelms, potential options for recovery of the same and status of case.	0.30	95.62
10/14/22	Kyle Ewing	Telephonic and email communication with J. Holpuch (Holo eDiscovery) re: potentially retaining Holo for document hosting and eDiscovery services for receivership and related litigation.	0.80	272.00
10/14/22	Kyle Ewing	Weekly conference with AFS (G. Winkler, A. Deering, J. McGraw, and M. Barkhanoy), Allen Matkins (D. Naro), and C. Spaulding (GT) re: various asset/document recovery efforts, including Judd condo in Bahahmas, turnover of "retainer" funds held by attorneys, and efforts to obtain documents from banks; plan and prepare for the same.	1.10	374.00
10/14/22	Kara B. Hendricks	Review emails and correspond with C. Spaulding regarding pending issues and information requested by G. Winkler.	0.30	144.07
10/14/22	Kara B. Hendricks	Follow-up with D. Hollingsworth regarding Humphries stipulation.	0.10	48.02
10/14/22	Cynthia L. Ney	Preparation of Notice of Subpoena issued to Nevada DMV and service of same upon counsel.	0.40	70.00
10/14/22	Cynthia L. Ney	Finalize subpoena and application and arrangements for service of same upon DMV.	0.60	105.00
10/14/22	Christian Spaulding	Participate in weekly check-in call to collaborate regarding status of assets recovered, vehicles, properties, and status of case.	0.90	286.87
10/14/22	Christian Spaulding	Review documents provided by client, incorporate related amounts into Second Application for Fees, and finalize draft of the same.	1.80	573.75

10/14/22	Christian Spaulding	Begin draft of Motion to Compel or Order to Show Cause Why Aaron Grigsby and Paula Beasley should not be held in contempt.	3.30	1,051.87
10/14/22	Christian Spaulding	Evaluate summary of recovery and discussion regarding the same with Josh McGraw to be included in second application for fees.	0.50	159.37
10/17/22	Kyle Ewing	Conference with K. Hendricks (GT) re: the Humphries' efforts to obtain funds sent to frozen bank accounts for purportedly 'new' businesses and potential claims for theft of corporate assets from receivership property in connection with the same; options for eDiscovery and housing documents obtained by receiver, and efforts to halt foreclosure process w/ respect to Beasley Tahoe property/mortgage.	0.50	170.00
10/17/22	Kyle Ewing	Review email correspondence from A. Grigsby re: his failure to provide information/receivership property consistent with the receivership order in connection with reviewing the receiver's motion to compel re: the same; conference with K. Hendricks re: next steps in light of the information provided by Grigsby.	0.40	136.00
10/17/22	Kara B. Hendricks	Respond to C. Spaulding inquiries regarding motion to compel and exhibits to same.	0.10	48.02
10/17/22	Kara B. Hendricks	Review motion to clarify asset freeze filed on behalf of R. Madsen and begin outline for response to same.	0.70	336.17
10/17/22	Kara B. Hendricks	Attention to email from A. Deering regarding missing Rolls Royce picnic tables.	0.10	48.02
10/17/22	Kara B. Hendricks	Review correspondence from T. Combs regarding G-Wagon (.1); Review correspondence from A. Grisby regarding G-Wagon and prior document requests (.2); Follow-up with D. Scheiss regarding G-Wagon (1.); Send update to G. Winkler (.2).	0.60	288.15
10/17/22	Kara B. Hendricks	Review case law in support of turnover of G-Wagon as fraudulent transfer standards.	1.10	528.27
10/17/22	Kara B. Hendricks	Strategize with K. Ewing regarding efforts relating to Pest Control companies and vehicle recovery and outline next steps.	0.40	192.10
10/17/22	Kara B. Hendricks	Attention to emails from J. Jongeward regarding production of documents and bank holds and related follow-up.	0.10	48.02
10/17/22	Kara B. Hendricks	Attention to pleadings from NY action against Beasley, Family Court documents and related information to analyze position asserted regarding P. Beasley right to certain vehicles and assets.	0.90	432.22
10/17/22	Kara B. Hendricks	Respond to email from B. Scheuller regarding G-Wagon (.1); Follow-up with	0.20	96.05

		C. Spaulding regarding preparation of motion (.1).		
10/17/22	Kara B. Hendricks	Review correspondence from L. Palazzo regarding attorney fees and follow-up with G. Winkler regarding same.	0.10	48.02
10/17/22	Cynthia L. Ney	Research and compilation of additional deeds for real property of S.Jager (.4); analysis of documentation provided by S.Jager regarding real property and preparation of chart of properties, status and purchases/sales (1.3); communications with K.Hendricks regarding same (.1).	1.70	297.50
10/17/22	Christian Spaulding	Evaluate Beasley divorce proceedings and action in Kings County, NY to determine relevance to this matter. Confer with K. Hendricks regarding the same.	3.10	988.12
10/17/22	Christian Spaulding	Communications with Ben Tranquillo regarding Receivership Vehicles for sale and research regarding the same.	0.40	127.50
10/17/22	Christian Spaulding	Continue and finalize draft of Motion to Compel or for Order to Show Cause Why Aaron Grigsby and Paula Beasley should not be held in contempt.	8.90	2,836.87
10/18/22	Kyle Ewing	Conference with K. Hendricks re: latest developments re: P. Beasley and A. Grigsby's sale of Beasley Mercedes G Wagon, as well as investigation of potential litigation claims in preparation for today's team call with AFS and Allen Matkins; follow-up re: email communication from R. Brace re: class action against Wells Fargo and receiver's options with respect to protecting the estate's claims against Wells Fargo.	0.70	238.00
10/18/22	Kyle Ewing	Weekly conference with AFS (G. Winkler, J. Hall, A. Deering, J. McGraw, and M. Barkhanoy), Allen Matkins (D. Naro, J. delCastillo, M. Pham), and K. Hendricks (GT) re: document subpoenas to banks; status of efforts to take possession of real property and vehicles; update on class action against Wells Fargo; and attorneys/defendants failures to comply with the Court's order.	1.20	408.00
10/18/22	Kyle Ewing	Email communication with G. Winkler (AFS) re: estimate and information re: offerings from Holo eDiscovery for eDiscovery and information management services for the receivership.	0.30	102.00
10/18/22	Kara B. Hendricks	Attention to email from R. Brace and order denying stay in Wells Fargo proceeding including follow-up to schedule a call with R. Brace and team and follow-up with potential outside counsel.	0.70	336.17
10/18/22	Kara B. Hendricks	Telephone call with potential counsel regarding class action proceeding and implications of order denying stay.	0.20	96.05

10/18/22	Kara B. Hendricks	Participate in call with G. Winkler, A. Deering, J. Hall, J. delCastillo, D. Zaro and other team members to discuss forensic accounting, asset evaluation and recovery, case priorities and next steps.	1.20	576.30
10/18/22	Kara B. Hendricks	Telephone discussion with D. Hollingsworth regarding turnover of items from FBI.	0.20	96.05
10/18/22	Kara B. Hendricks	Review and revise motion to compel and convert to include P. Beasley and G-Wagon.	4.10	1,969.02
10/18/22	Kara B. Hendricks	Respond to email from L. Maningo regarding Seybert business sale.	0.10	48.02
10/18/22	Kara B. Hendricks	Attention to email from J. Jongeward regarding document production and filing.	0.10	48.02
10/18/22	Kara B. Hendricks	Attention to email from B. Tranquillo regarding Vegas Valley records and value of G-Wagon on 4/30/22 (.2).	0.20	96.05
10/18/22	Akke Levin	Strategy re recovery of fraudulent transfer of receivership estate property (0.2); conduct legal research re same and share findings with Kara Hendricks (0.9).	1.10	514.25
10/18/22	Cynthia L. Ney	Communications with process server and K.Hendricks regarding DMV Subpoena.	0.20	35.00
10/18/22	Cynthia L. Ney	Review file and communications with G.Winkler regarding fee application.	0.20	35.00
10/18/22	Cynthia L. Ney	Analysis and summary of financial records.	1.60	280.00
10/18/22	Christian Spaulding	Meeting with Kara Hendricks regarding possible means for turnover of Mercedes G-Wagon sold by Paula Beasley.	0.30	95.62
10/18/22	Christian Spaulding	Confer with K. Hendricks regarding status and background of Range Rover previously owned by Judd located at Lexus of Henderson.	0.30	95.62
10/19/22	Kyle Ewing	Telephonic conference with K. Hendricks (GT), G. Winkler (AFS), D. Zaro/J. delCastillo (AM), and S. Mirkovich (Campbell Williams) re: court's denial of motion to stay discovery in class action against Wells Fargo.	0.90	306.00
10/19/22	Kara B. Hendricks	Attention to email from G. Winkler regarding Eco Batter.	0.10	48.02
10/19/22	Kara B. Hendricks	Participate in call with G. Winkler, D. Zaro, potential counsel regarding pending class action suit and options moving forward.	0.60	288.15
10/19/22	Kara B. Hendricks	Continue preparation of motion to compel, P. Beasley, A. Grisgy and G-Wagon.	0.80	384.20
10/19/22	Kara B. Hendricks	Correspond via email with B. Tranquillo regarding G-Wagon value and resources to support same.	0.20	96.05
10/19/22	Cynthia L. Ney	Preparation of subpoena and document requests to Vegas Auto Gallery for vehicles owned by M.Beasley (.9); communications with K.Hendricks regarding same (.1).	1.00	175.00
10/19/22	Christian Spaulding	Evaluate list of items removed/left at Ruffian property from P. Beasley and	0.50	159.37

		corresponding divorce proceeding documents. Confer with K. Hendricks regarding the same.		
10/19/22	Christian Spaulding	Review and revise draft of subpoena to Vegas Auto Gallery regarding previous sale of Ferrari and Aston Martin.	0.30	95.62
10/20/22	Kyle Ewing	Participate in telephonic conference with D. Zaro (AM); K. Hendricks (GT); G. Winkler (AFS), and R. Brace on behalf of plaintiffs' lawyers in Wells Fargo class action; follow-up with K. Hendricks and G. Winkler.	0.90	306.00
10/20/22	Kyle Ewing	Research law re: stays of class action litigation versus receivership claims in connection with advising the receiver on best course of action with regard to Wells Fargo class action.	0.30	102.00
10/20/22	Kara B. Hendricks	Telephone call with G. Winkler regarding Eco Battery and pending class action matter.	0.30	144.07
10/20/22	Kara B. Hendricks	Attention to emails regarding Eco Battery subpoena and communication with Jager.	0.30	144.07
10/20/22	Kara B. Hendricks	Request C. Ney's assistance with review and identifying additional materials regarding accounts and assets provided by Defendants and requested from M. Pham.	0.20	96.05
10/20/22	Kara B. Hendricks	Call with counsel in class action matter to discuss sharing resources and next steps.	0.50	240.12
10/20/22	Kara B. Hendricks	Prepare motion to compel relating to P. Beasley, Grigsby and G-Wagon including further factual analysis and research relating to value of G-Wagon for relevant time periods, and request for fees.	4.20	2,017.05
10/20/22	Kara B. Hendricks	Attention to subpoena for information regarding Ferrari and Aston Martin.	0.10	48.02
10/20/22	Cynthia L. Ney	Finalize subpoena to Vegas Auto Gallery and arrangements for service of same (.3); preparation of notice of subpoena and service of same upon all counsel (.4); communications with K.Hendricks regarding same (.1).	0.80	140.00
10/20/22	Cynthia L. Ney	Review file, communications with and compilation of materials and forwarding of same to M.Pham for review.	0.80	140.00
10/20/22	Cynthia L. Ney	Analysis and organization of certified statements and records received by Defendants.	1.10	192.50
10/20/22	Christian Spaulding	Evaluate applicable case law regarding bona fide purchaser status and draft summary of the same for K. Hendricks to be inserted into Motion to Compel Re: Aaron Grigsby and Paula Beasley.	1.90	605.62
10/21/22	Kyle Ewing	Research law re: obtaining stays of concurrent litigation involving and affecting receivership property; review consolidated class action complaint in conjunction with the same; review	1.70	578.00

10/21/22	Kara B. Hendricks	pleadings related to the same. Update motion to compel with comments from G. Winkler and prepare declarations of G. Winkler and B. Tranquillo in support of the same.	2.50	1,200.62
10/21/22	Kara B. Hendricks	Attention to outstanding issues relating to South Lake Tahoe property and follow-up with R. Williams including request that notice of default be withdrawn.	0.20	96.05
10/21/22	Kara B. Hendricks	Attention to email regarding information provided regarding M. Murphy.	0.30	144.07
10/21/22	Kara B. Hendricks	Review documents from Vegas Valley and follow-up with B. Tranquillo regarding same.	0.40	192.10
10/21/22	Kara B. Hendricks	Telephone call from Kelly at the DMV regarding subpoena and follow-up with B. Tranquillo regarding number missing in VIN.	0.20	96.05
10/21/22	Kara B. Hendricks	Correspond with A. Deering regarding tracking assets and recovered items and discuss same with C. Ney.	0.10	48.02
10/21/22	Kara B. Hendricks	Correspond with B. Tranquillo regarding Vegas Valley and provide copy of subpoena (.1); Email Blake at Vegas Valley copy of same (.1).	0.20	96.05
10/21/22	Cynthia L. Ney	Analysis and editing of Motion to Compel sale of G-Wagon, supporting declarations of G.Winkler and B.Tranquillo and compile and prepare numerous supporting exhibits (4.2); communications with K.Hendricks regarding same (.2).	4.40	770.00
10/21/22	Cynthia L. Ney	Review file regarding VIN numbers and call to NV DMV with same (.3); communications with K.Hendricks and B.Tranquillo regarding same (.1).	0.40	70.00
10/21/22	Cynthia L. Ney	Analysis and organization of documentation produced by Vegas Auto Gallery (1.6); communications with K.Hendricks regarding same (.2).	1.80	315.00
10/21/22	Christian Spaulding	Review and revise most recent draft of Motion to Compel or Order to Show Cause Why Aaron Grigsby and Paula Beasley Should not be held in contempt.	1.10	350.75
10/21/22	Christian Spaulding	Confer with team regarding Beasley Divorce proceedings and gather all available documents regarding the same.	0.30	95.62
10/23/22	Kyle Ewing	Research law re: obtaining stays of concurrent litigation involving and affecting receivership property; review consolidated class action complaint in conjunction with the same; review pleadings related to the same	4.00	1,360.00
10/24/22	Kyle Ewing	Email communication with G. Winkler (AFS), K. Hendricks, and Allen Matkins re: the receiver's options for obtaining stays of concurrent litigation involving and affecting receivership property, including	0.20	68.00

		the consolidated class action pending in federal court.		
10/24/22	Kyle Ewing	Research law re: obtaining stays of concurrent litigation involving and affecting receivership property; review consolidated class action complaint in conjunction with the same.	1.70	578.00
10/24/22	Kyle Ewing	Draft memorandum re: the receiver's options for obtaining stays of concurrent litigation involving and affecting receivership property, including the consolidated class action pending in federal court.	3.10	1,054.00
10/24/22	Kara B. Hendricks	Call with counsel for SEC regarding Eco Battery.	0.70	336.17
10/24/22	Kara B. Hendricks	Attention to emails regarding service issues and follow-up with B. Rabe to discuss next steps after review of statute for alternative service methods.	0.50	240.12
10/24/22	Kara B. Hendricks	Provide W. Schuller and A. Grigsby courtesy copy of motion to compel and respond to email from W. Schuller regarding same.	0.30	144.07
10/24/22	Kara B. Hendricks	Discuss research findings and options relating to class action and ability to stay the same with K. Ewing and outline next steps.	0.50	240.12
10/24/22	Kara B. Hendricks	Correspond with G. Winkler regarding use of documents from subpoena in upcoming filings to compel turnover.	0.20	96.05
10/24/22	Kara B. Hendricks	Review and revise proposal to address timing and issues relating to class claims and proposed next steps.	0.40	192.10
10/24/22	Kara B. Hendricks	Attention to emails from A. Deering regarding tax returns and information needed from defendants.	0.10	48.02
10/24/22	Kara B. Hendricks	Request C. Ney's assistance with letter requesting tax informations from defendants and discuss documents provided to date and additional information needed to evaluate asset and recovery efforts.	0.30	144.07
10/24/22	Cynthia L. Ney	Compilation of materials and forwarding of same to Amanda Deering.	0.50	87.50
10/24/22	Cynthia L. Ney	Communications with K.Hendricks regarding analysis of defendant documentation.	0.20	35.00
10/24/22	Christian Spaulding	Evaluate Motion to Clarify Asset Freeze and to Retain Fees filed by R. Madsen.	0.60	191.25
10/24/22	Christian Spaulding	Evaluate allegations in amended complaint regarding R. Madsen's role in scheme giving rise to the instant action and begin draft of Response to Motion to Clarify Asset Freeze.	7.20	2,295.00
10/24/22	Christian Spaulding	Draft summary of arguments to be made in response to R. Madsen motion to clarify asset freeze.	0.30	95.62

10/25/22	Kyle Ewing	Weekly conference with AFS (G. Winkler, J. Hall, A. Deering, J. McGraw, and M. Barkhanoy), Allen Matkins (D. Naro, J. delCastillo, M. Pham), and K. Hendricks (GT) re: document subpoenas to banks; status of efforts to take possession of real property and vehicles; update on class action against Wells Fargo; and attorneys/defendants failures to comply with the Court's order.	1.00	340.00
10/25/22	Kyle Ewing	Conference with GT team (K. Hendricks, C. Spaulding, and C. Ney) re: attorney tasks, including land sales/documentation, continued efforts to recover receivership assets from attorneys/defendants, defendants' investments in other enterprises, ancillary bankruptcy/class action proceedings, and status of analysis of bank records and forensic accounting.	0.70	238.00
10/25/22	Kara B. Hendricks	Prepare letter regarding turnover of homes.	1.30	624.32
10/25/22	Kara B. Hendricks	Telephone call to P. Matzke regarding Judd LandRover at Lexus of Henderson.	0.20	96.05
10/25/22	Kara B. Hendricks	Review certified statement by Robinhood Markets regarding funds held in names of defendants.	0.10	48.02
10/25/22	Kara B. Hendricks	Follow-up with D. Hollingsworth regarding turnover motion.	0.10	48.02
10/25/22	Kara B. Hendricks	Review proposed engagement letter for Woodbridge and request C. Ney pull docket and additional information regarding fee structure.	0.20	96.05
10/25/22	Kara B. Hendricks	Telephone call with G. Winkler to discuss call with J. Kellogg and next steps.	0.20	96.05
10/25/22	Kara B. Hendricks	Conference with GT team (K. Ewing, C. Spaulding, and C. Ney) re: attorney tasks, including land sales/documentation, continued efforts to recover receivership assets from attorneys/defendants, defendants' investments in other enterprises, ancillary bankruptcy/class action proceedings, and status of analysis of bank records and forensic accounting.	0.70	336.17
10/25/22	Kara B. Hendricks	Review Madsen motion to compel and provide additional augments and materials for C. Spaulding to incorporate into response and follow-up regarding same.	0.40	192.10
10/25/22	Kara B. Hendricks	Participate in receivership team meeting and provide update on efforts to recover vehicles and other assets, discuss next steps and divide tasks.	1.00	480.25
10/25/22	Cynthia L. Ney	Team meeting with K.Hendricks, K.Ewing and C.Spaulding regarding attorney tasks, including land sales/documentation, continued efforts to recover receivership assets from attorneys/defendants, defendants' investments in other enterprises, ancillary bankruptcy/class	0.70	122.50

10/25/22	Cynthia L. Ney	action proceedings, and status of analysis of bank records and forensic accounting. Review file and compilation of materials in preparation for team meeting.	0.40	70.00
10/25/22	Cynthia L. Ney	Review and analysis of files regarding financial documentaton provided by defendants (.2); communications with K.Hendricks regarding same (.1).	0.30	52.50
10/25/22	Cynthia L. Ney	Draft sample letter to counsel and defendants regarding missing tax returns and certified statements (.4); review docket and update contact list (.6); communications with K.Hendricks regarding same (.1).	1.10	192.50
10/25/22	Cynthia L. Ney	Review and analysis of financial documents forwarded by J.Jongeward (.5); communications with E.Escobar regarding same (.2).	0.70	122.50
10/25/22	Christian Spaulding	Conference with GT Team (K. Hendricks, K. Ewing, and C. Ney) re: attorney tasks, including land sales/documentation, continued efforts to recover receivership assets from attorneys/defendants, defendants' investments in other enterprises, ancillary bankruptcy/class action proceedings, and status of analysis of bank records and forensic accounting.	0.70	223.12
10/25/22	Christian Spaulding	Continue draft of Response to R. Madsen Motion to Clarify Asset Freeze.	6.30	2,008.12
10/26/22	Kyle Ewing	Draft, review, and revise letter to P. Matzke of Lexus of Henderson re: P. Judd Range Rover.	0.50	170.00
10/26/22	Kara B. Hendricks	Participate in call with G. Winkler, and SEC counsel regarding ECO Battery options.	0.50	240.12
10/26/22	Kara B. Hendricks	Review emails and provide G. Winkler contact information for Eco Bat counsel.	0.20	96.05
10/26/22	Kara B. Hendricks	Review and revise response to Madsen motion regarding fees.	1.90	912.47
10/26/22	Kara B. Hendricks	Follow-up with K. Ewing regarding letter regarding P. Judd Land Rover.	0.10	48.02
10/26/22	Cynthia L. Ney	Research regarding Woodbridge Investments matters and compilation of pleadings for K.Hendricks' review.	1.40	245.00
10/26/22	Cynthia L. Ney	Analysis and compilation of response letters to request for attorney's fees received from defendants and update chart of responses (1.3); communications with C.Spaulding regarding same (.1).	1.40	245.00
10/26/22	Christian Spaulding	Finalize draft of Response to R. Madsen Motion to Clarify Asset Freeze. Confer with K. Hendricks regarding the same.	3.60	1,147.50
10/27/22	Kara B. Hendricks	Attention to documents pulled from Woodbrdige class action and follow-up with G. Winkler regarding proposal and email from J. Kellogg.	0.40	192.10
10/27/22	Kara B. Hendricks	Continue revisions to Madsen fee motion	1.70	816.42

		and forward to G. Winkler for review and comment.		
10/27/22	Kara B. Hendricks	Revise letter to Lexus of Henderson regarding P. Judd Land Rover.	0.10	48.02
10/27/22	Kara B. Hendricks	Revise letter template to defendants requesting tax returns and certified statement (.3); Follow-up with C. Ney to assist with preparation and finalizing of same (.1).	0.40	192.10
10/27/22	Kara B. Hendricks	Attention to emails relating to sale of Sky Arc property.	0.10	48.02
10/27/22	Cynthia L. Ney	Compilation and forwarding of J.Jongeward financial records to Amanda Deering.	0.30	52.50
10/27/22	Cynthia L. Ney	Analysis of financial documentation forwarded by M.Pham and missing certified statements and records.	0.40	70.00
10/27/22	Cynthia L. Ney	Analysis and editing of opposition to Richard Madsen's motion and preparation of supporting exhibits (2.3); communications with K.Hendricks and C.Spaulding regarding same (.2).	2.50	437.50
10/27/22	Christian Spaulding	Draft declaration of Kara Hendricks in support of Response to R. Madsen Motion to Clarify Asset Freeze.	0.80	255.00
10/27/22	Christian Spaulding	Gather exhibits to be submitted in support of Response to R. Madsen Motion to Clarify Asset Freeze.	0.50	159.37
10/27/22	Christian Spaulding	Coordinate with team regarding finalizing draft of Response to R. Madsen Motion to Clarify Asset Freeze.	0.40	127.50
10/28/22	Kara B. Hendricks	Review emails from D. Cluckey regarding C. Rohner accounts and review prior stipulation.	0.20	96.05
10/28/22	Kara B. Hendricks	Revise declaration in support of R. Madsen fee motion (.2); Correspond via email with C. Ney regarding exhibits and citations in brief and finalizing same (.3).	0.50	240.12
10/28/22	Kara B. Hendricks	Work with C. Ney on letters to defendants regarding certified statements and follow-up with M. Pham to determine scope of prior work to avoid duplicative efforts.	0.40	192.10
10/28/22	Kara B. Hendricks	Update interim status report and correspond with A. Deering regarding same.	0.60	288.15
10/28/22	Kara B. Hendricks	Correspond with A. Deering regarding defendant compliance with stipulations.	0.20	96.05
10/28/22	Cynthia L. Ney	Review and updating of response to Richard Madsen's Motion regarding attorney fees and Declaration of K.Hendricks (.9); finalize exhibits for filing (.3); communications with K.Hendricks and C.Spaulding regarding response (.1).	1.30	227.50
10/28/22	Cynthia L. Ney	Review file and update party contact list and various charts.	0.80	140.00
10/28/22	Cynthia L. Ney	Update chart regarding defendants' tax returns received and missing.	0.40	70.00

10/28/22	Cynthia L. Ney	Review file regarding statements and documentation received by defendants and preparation of numerous letters to counsel and defendants regarding required documentation not received (2.5); communications with K.Hendricks regarding same (.2).	2.70	472.50
10/28/22	Christian Spaulding	Review and revise citations in Receiver's Response to Madsen's Motion to Clarify Asset Freeze and to Retain Fees.	0.30	95.62
10/31/22	Kyle Ewing	Review and analyze the Receiver's second quarterly report in connection with ongoing efforts to investigate and marshal assets for the benefit of the estate.	0.40	136.00
10/31/22	Kara B. Hendricks	Attention to email and documents regarding lien notice provided by an investor and correspond with A. Deering regarding same.	0.20	96.05
10/31/22	Kara B. Hendricks	Attention to email and documents regarding Rocking Horse properties and follow-up with L. Maningo regarding concerns with credit card use(.3); Correspond with A. Deering regarding same (.2).	0.50	240.12
10/31/22	Kara B. Hendricks	Prepare notice to accompany submittal of investor list for in camera review and work with E. Escobar-Gaddi regarding filing of same.	0.30	144.07
10/31/22	Kara B. Hendricks	Respond to email from R. Goodman regarding Jeffry compliance with receivership order and time period for tax returns.	0.10	48.02
10/31/22	Kara B. Hendricks	Attention to email from A. Deering regarding M. Murphy and investor question and request C. Ney to research.	0.20	96.05
10/31/22	Kara B. Hendricks	Attention to email from M. Pham and follow-up with C. Ney regarding information needed from Relief Defendants.	0.10	48.02
10/31/22	Kara B. Hendricks	Review and finalize letters to defendants regarding tax returns and certified statements (Jongeward, R. Madsen, Rohner, Johnson, Jenne, Jeffrey, Tanner, C. Madsen, ALberto, Seybert, Jager, Humphries).	0.80	384.20
10/31/22	Kara B. Hendricks	Telephone call to Zakharayayev law offices regarding purported lien and follow-up via email with receivership order, amended complaint and request for additional information.	0.50	240.12
10/31/22	Kara B. Hendricks	Attention to quarterly status report and correspond with A. Deering regarding exhibits and finalizing same.	0.40	192.10
10/31/22	Cynthia L. Ney	Finalize numerous letters to counsel and defendants regarding need for tax returns and certified statements and service of same (1.6); communications with	1.70	297.50

10/31/22	Cynthia L. Ney	K.Hendricks regarding same (.1). Analysis of communications regarding Mark Murphy's involvement and communications with K.Hendricks and A.Deering regarding same.	0.80	140.00
10/31/22	Cynthia L. Ney	Email communications regarding certified statements from defendants.	0.20	35.00

Total Hours: 191.90

Total Amount: \$ 68,394.47

TIMEKEEPER SUMMARY FOR TASK CODE GW001,

ASSET ANALYSIS AND RECOVERY

Summary of Fees (Base Rates)

<u>Timekeeper Name</u>	<u>Hours Billed</u>	<u>Base Rate</u>	<u>Total \$ Amount</u>
Kara B. Hendricks	74.70	565.00	42,205.50
Kyle Ewing	21.70	400.00	8,680.00
Christian Spaulding	56.40	375.00	21,150.00
Akke Levin	1.10	550.00	605.00
Cynthia L. Ney	38.00	295.00	11,210.00
Totals:	191.90		\$ 83,850.50

Summary of Fees (Discounted Rates)

<u>Timekeeper Name</u>	<u>Hours Billed</u>	<u>Average Discounted Rate</u>	<u>Total \$ Amount</u>
Kara B. Hendricks	74.70	480.25	35,874.72
Kyle Ewing	21.70	340.00	7,378.00
Christian Spaulding	56.40	318.75	17,977.50
Akke Levin	1.10	467.50	514.25
Cynthia L. Ney	38.00	175.00	6,650.00
Totals:	191.90		\$ 68,394.47

TASK CODE: GW004 CASE ADMINISTRATION

<u>DATE</u>	<u>TIMEKEEPER</u>	<u>DESCRIPTION</u>	<u>HOURS</u>	<u>AMOUNT</u>
10/05/22	Kara B. Hendricks	Attention to emails with bank statements from J. Humphries and D. Cluckey (.1); Request C. Ney to track responses and prepare list identifying defendants that have not complied with stipulation reporting requirements (.1).	0.20	96.05
10/05/22	Kara B. Hendricks	Message from Judge Silva clerk regarding service of investor list.	0.10	48.02
10/06/22	Kara B. Hendricks	Telephone call with court clerk regarding sealing of documents relating to investor contacts and develop plan going forward.	0.20	96.05
10/07/22	Kara B. Hendricks	Attention to email from J. Giardino regarding C. Madsen investor list and requested documents.	0.10	48.02
10/11/22	Kara B. Hendricks	Correspond via email with J. del Castillo regarding interim status report and upcoming deadlines.	0.10	48.02
10/13/22	Kara B. Hendricks	Review court docket and correspond via email and in person with G. Winkler regarding status hearing.	0.80	384.20
10/13/22	Cynthia L. Ney	Review, edit and calculation of fees and hours for quarterly fee application (1.9); communications with K.Hendricks regarding same (.2).	2.10	367.50
10/14/22	Cynthia L. Ney	Prepare K.Hendricks Declaration in support of second application for fees and costs.	0.40	70.00
10/14/22	Cynthia L. Ney	Review, analysis and editing of application for fees of Receiver and Greenberg Traurig (3.6); communications with G. Winkler, C. Spaulding and M.Barkhanoy regarding same (.4).	4.00	700.00
10/17/22	Cynthia L. Ney	Review, analysis and editing of application for fees of Receiver and Greenberg Traurig (.4); communications with K.Hendricks and M.Barkhanoy regarding same (.2).	0.60	105.00
10/18/22	Kyle Ewing	Review proposal and statement of work provided by Holo for eDiscovery and electronic information management for the receivership in preparation for discussion with AFS re: the same.	0.20	68.00
10/18/22	Cynthia L. Ney	Review AFS' revised invoices and update fee application (1.6); communications with M.Barkhanoy and K.Hendricks regarding application (.3); forwarding of second quarterly application for fees to SEC counsel (.1).	2.00	350.00
10/25/22	Kara B. Hendricks	Attention to draft email to send to investors with update and correspond with A. Deering regarding same.	0.20	96.05
10/27/22	Kara B. Hendricks	Review and revise quarterly status report	1.40	672.35

10/31/22	Kara B. Hendricks	and send proposed changes to A. Deering and G. Winkler for review. Correspond with A. Deering regarding updating investor list for in camera submission.	0.10	48.02
----------	-------------------	---	------	-------

Total Hours: 12.50

Total Amount: \$ 3,197.28

TIMEKEEPER SUMMARY FOR TASK CODE GW004,

CASE ADMINISTRATION

Summary of Fees (Base Rates)

Timekeeper Name	Hours Billed	Base Rate	Total \$ Amount
Kara B. Hendricks	3.20	565.00	1,808.00
Kyle Ewing	0.20	400.00	80.00
Cynthia L. Ney	9.10	295.00	2,684.50
Totals:	12.50		\$ 4,572.50

Summary of Fees (Discounted Rates)

Timekeeper Name	Hours Billed	Average Discounted Rate	Total \$ Amount
Kara B. Hendricks	3.20	480.24	1,536.78
Kyle Ewing	0.20	340.00	68.00
Cynthia L. Ney	9.10	175.00	1,592.50
Totals:	12.50		\$ 3,197.28

TASK CODE: GW005 CLAIMS ADMINISTRATION AND OBJECTIONS

<u>DATE</u>	<u>TIMEKEEPER</u>	<u>DESCRIPTION</u>	<u>HOURS</u>	<u>AMOUNT</u>
10/03/22	Kara B. Hendricks	Attention to email and investor list from D. O'Toole on behalf of R. Madsen and forward to A. Deering.	0.10	48.02
10/03/22	Kara B. Hendricks	Prepare letter to R. Goodman regarding Jeffery funds.	0.60	288.15
10/03/22	Kara B. Hendricks	Follow-up with C. Fronk regarding representations made by counsel for W. Rosegreen regarding fess and clean accounts.	0.20	96.05
10/03/22	Kara B. Hendricks	Prepare letter to L. Palazzo regarding Jager funds and 9/21 response letter.	0.70	336.17
10/03/22	Kara B. Hendricks	Attention to correspondence received from defense counsel regarding attorney fee payments including review fee orders and outline response to include in correspondence to counsel retaining funds.	0.90	432.22
10/04/22	Kara B. Hendricks	Follow-up with G. Winkler to schedule call with K. Christensen to discuss anticipated claim process and correspond with K. Christensen regarding same.	0.20	96.05
10/05/22	Kara B. Hendricks	Review proposed stipulation regarding Murphy and follow-up with G. Winkler or C. Fronk regarding same.	0.30	144.07
10/06/22	Kara B. Hendricks	Follow-up regarding Lexus response to subpoena for records regarding Judd vehicle.	0.10	48.02
10/24/22	Kara B. Hendricks	Attention to emails from B. Tranquilly regarding new documents from subpoenas and follow-up.	0.30	144.07
Total Hours:			3.40	
Total Amount:				\$ 1,632.82

TIMEKEEPER SUMMARY FOR TASK CODE GW005,

CLAIMS ADMINISTRATION AND OBJECTIONS

Summary of Fees (Base Rates)

<u>Timekeeper Name</u>	<u>Hours Billed</u>	<u>Base Rate</u>	<u>Total \$ Amount</u>
Kara B. Hendricks	3.40	565.00	1,921.00
Totals:	3.40		\$ 1,921.00

Summary of Fees (Discounted Rates)

<u>Timekeeper Name</u>	<u>Hours Billed</u>	<u>Average Discounted Rate</u>	<u>Total \$ Amount</u>
Kara B. Hendricks	3.40	480.24	1,632.82
Totals:	3.40		\$ 1,632.82

TIMEKEEPER ACTIVITY GRAND TOTAL SUMMARY**Summary of Fees (Base Rates)**

<u>Timekeeper</u>	<u>Hours</u>	<u>Rate</u>	<u>Amount</u>
Kara B. Hendricks	81.30	565.00	45,934.50
Kyle Ewing	21.90	400.00	8,760.00
Christian Spaulding	56.40	375.00	21,150.00
Akke Levin	1.10	550.00	605.00
Cynthia L. Ney	47.10	295.00	13,894.50
Totals:	207.80		\$ 90,344.00

Summary of Fees (Discounted Rates)

<u>Timekeeper</u>	<u>Hours</u>	<u>Rate</u>	<u>Amount</u>
Kara B. Hendricks	81.30	480.25	39,044.32
Kyle Ewing	21.90	340.00	7,446.00
Christian Spaulding	56.40	318.75	17,977.50
Akke Levin	1.10	467.50	514.25
Cynthia L. Ney	47.10	175.00	8,242.50
Totals:	207.80		\$ 73,224.57

Invoice No.: 1000224348
 Re: SEC v. Beasley (Geoff Winkler, Receiver)
 Matter No.: 209375.010100

Page 25

Description of Expenses Billed:

<u>DATE</u>	<u>DESCRIPTION</u>		<u>AMOUNT</u>
10/11/22	VENDOR: Nationwide Legal, LLC - 4527 INVOICE#: 00000049004 DATE: 10/15/2022 SPECIAL RESEARCH (IMMEDIATELY) - UNITED STATES DISTRICT COURT DISTRICT OF NEVADA, 333 LAS VEGAS BLVD., SOUTH, LAS VEGAS NV on 10/11/22 Req'd by/for Escobar-Gaddi, Evelyn	\$	63.00
10/14/22	VENDOR: Nationwide Legal, LLC - 4527 INVOICE#: 00000049473 DATE: 10/31/2022 STANDARD PROCESS (48 to 72 HRS) - , 555 Wright Way, Carson City on 10/14/22 Req'd by/for Ney, Cynthia L.	\$	147.00
10/20/22	VENDOR: Nationwide Legal, LLC - 4527 INVOICE#: 00000049473 DATE: 10/31/2022 STANDARD PROCESS (48 to 72 HRS) - , 3055 Palms Center Drive, Suite B, Las Vegas on 10/20/22 Req'd by/for Ney, Cynthia L.	\$	105.00
10/25/22	VENDOR: Kinsey, Teri INVOICE#: 5502657711081944 DATE: 11/8/2022 Other; 10/25/22 - Record Search Fees by DMV; Merchant: DMV-02	\$	144.00
	Total Expenses:	\$	459.00



Invoice No. : 1000224498
File No. : 209375.010100
Bill Date : February 14, 2023

Geoff Winkler
715 NW Hoyt Street, Suite 4364
Portland, OR 97208

Attn: Geoff Winkler

INVOICE

Re: SEC v. Beasley (Geoff Winkler, Receiver)

THIS INVOICE REPLACES INVOICE 1000166978

Total Fees: \$ 59,170.30

Expenses:

Information and Research 389.93

Total Expenses: \$ 389.93

Current Invoice: \$ 59,560.23

Previous Balance (see attached statement): \$ 99,457.89

Total Amount Due: \$ 159,018.12

KBH:LC
Tax ID: 13-3613083



Invoice No. : 1000224498
File No. : 209375.010100

REMITTANCE ADVICE

PLEASE RETURN WITH YOUR PAYMENT
Note: Payment is Due 30 Days from Date of Invoice

CLIENT NAME: WINKLER, GEOFF
FILE NUMBER: 209375.010100
INVOICE NUMBER: 1000224498*
BILLING PROFESSIONAL: Kara B. Hendricks

Current Invoice:	\$	59,560.23
Previous Balance:	\$	99,457.89
Total Amount Due:	\$	159,018.12

FOR YOUR CONVENIENCE, WIRE TRANSFER FUNDS TO:

For Wire Instructions:

Bank: WELLS FARGO BANK
ABA #: 121000248

For ACH Instructions:

Bank: WELLS FARGO BANK
ABA#: 063107513

CREDIT TO: GREENBERG TRAURIG DEPOSITORY ACCOUNT
ACCOUNT #: 2000014648663

PLEASE

REFERENCE: CLIENT NAME: WINKLER, GEOFF
FILE NUMBER: 209375.010100
INVOICE NUMBER: 1000224498*
BILLING
PROFESSIONAL: Kara B. Hendricks

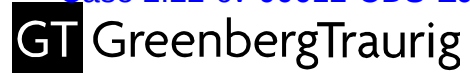
IF YOU WISH TO PAY BY CHECK PLEASE REMIT TO THE ADDRESS BELOW:

**Greenberg Traurig
PO Box 936769
ATLANTA GA 31193-6769**

Wire fees may be assessed by your bank.

*** If paying more than one invoice, please reference all invoice numbers in wiring instructions.**

KBH:LC
Tax ID: 13-3613083



Invoice No. : 1000224498
File No. : 209375.010100

Please contact acct-cashreceipts@gtlaw.com for any payment related questions.

KBH:LC

Tax ID: 13-3613083



Invoice No. : 1000224498
File No. : 209375.010100

Account Statement

<u>Date</u>	<u>Invoice #</u>	<u>Fees Due</u>	<u>Expenses Due</u>	<u>Other Due</u>	<u>Total Due</u>
07/19/22	1000035547	16,627.52	0.00	0.00	16,627.52
10/03/22	1000096060	12,029.69	0.00	0.00	12,029.69
11/09/22	1000142381	16,674.86	0.00	0.00	16,674.86
11/09/22	1000142507	8,666.16	0.00	0.00	8,666.16
02/10/23	1000219800	44,878.73	580.93	0.00	45,459.66
	Totals:	\$ 98,876.96	\$ 580.93	\$ 0.00	\$ 99,457.89

KBH:LC

Tax ID: 13-3613083

Description of Professional Services Rendered:

TASK CODE: GW001 ASSET ANALYSIS AND RECOVERY

<u>DATE</u>	<u>TIMEKEEPER</u>	<u>DESCRIPTION</u>	<u>HOURS</u>	<u>AMOUNT</u>
11/01/22	Kara B. Hendricks	Telephone call from D. Hollingsworth regarding motion for turnover and anticipated stipulations;	0.10	48.03
11/01/22	Kara B. Hendricks	Attention to email from J. Jongeward regarding document request and follow-up with C. Ney regarding same;	0.10	48.03
11/01/22	Kara B. Hendricks	Attention to email from D. Clukey regarding Johnson and Rohner information and forward missing exhibit to A. Deering and M. Pham;	0.30	144.08
11/01/22	Kara B. Hendricks	Correspond with C. Ney regarding M. Murphy and application of receivership order;	0.10	48.03
11/01/22	Kara B. Hendricks	Correspond with C. Fronk and T. Combs regarding scope of order relating to records and request to shorten compliance period;	0.10	48.03
11/01/22	Kara B. Hendricks	Correspond with A. Deering regarding references to Venmo and Paypal accounts;	0.10	48.03
11/01/22	Kara B. Hendricks	Correspond with A. Deering regarding Sebert account activity and requested documentation;	0.10	48.03
11/01/22	Kara B. Hendricks	Attention to emails and follow-up with L. Maningo regarding Rosegreen stipulation and funds deposited into frozen account;	0.30	144.08
11/02/22	Kyle Ewing	Begin investigating/analyzing potential claims of receivership estate against Humphries/other defendants related to diversion of fraudulent funds to various pest control businesses; review pleadings and other case documents related to businesses in connection with same	2.20	748.00
11/02/22	Kyle Ewing	Attention to M. Murphy's opposition to SEC's motion to amend; analyze the same	0.30	102.00
11/02/22	Kyle Ewing	Weekly telephonic conference with AFS team, AM team, and K. Hendricks re: asset collection and marshaling efforts, investigation of litigation claims, and matters related to turnover of assets/information by defendants, relief defendants, and third parties (.7); follow-up with K. Hendricks re: the same (.6)	1.30	442.00
11/02/22	Kara B. Hendricks	Review additional information from Judd regarding Bahamian condo and follow-up with A. Deering regarding same;	0.30	144.08
11/02/22	Kara B. Hendricks	Correspond with C. Ney regarding S. Jager and Sterling Consulting information requested/provided;	0.10	48.03

11/02/22	Kara B. Hendricks	Attention to email regarding EcoBattery;	0.10	48.03
11/02/22	Kara B. Hendricks	Follow-up with J. Kellogg and J. Schneider regarding next steps in class action proceeding;	0.20	96.05
11/02/22	Kara B. Hendricks	Participate in team call with Receiver team (J. Hall, A. Deering, J. McGraw), D. Zaro, J. del Castillo, M. Pham and K. Ewing to discuss current projects including asset recovery efforts, forensic accounting, bank records, potential new proceedings and next steps;	0.70	336.18
11/02/22	Kara B. Hendricks	Attention to emails regarding D. Seybert tax return and related documents;	0.10	48.03
11/02/22	Kara B. Hendricks	Attention to email from A. Deering regarding missing information from S. Johnson investor list and follow-up with D. Clukey regarding same;	0.10	48.03
11/02/22	Kara B. Hendricks	Review information in anticipation of meeting with potential conflicts counsel;	0.50	240.13
11/02/22	Kara B. Hendricks	Follow-up regarding funds requested by counsel for W. Rosegreen with J. Hall and L. Maningo;	0.20	96.05
11/02/22	Kara B. Hendricks	Review of records provided by the DMV and forward to B. Tranquillo for further assessment;	0.60	288.15
11/02/22	Kara B. Hendricks	Attention to emails regarding Rhoner Chase bank account and unfreezing same and provide copy of court order on living expense stipulation;	0.20	96.05
11/02/22	Cynthia L. Ney	Compilation and forwarding of D.Seybert tax returns to A.Deering.	0.30	52.50
11/02/22	Cynthia L. Ney	Call with L.Palazzo's office regarding letter requesting tax returns for S.Jager (.2); analysis of documentation already sent by Jager and communications with K.Hendricks regarding same (.6).	0.80	140.00
11/02/22	Cynthia L. Ney	Communications with J.Jongeward regarding request for tax returns (.1); review documents sent (.4)	0.50	87.50
11/03/22	Kyle Ewing	Research application of in pari delicto doctrine under Nevada law and application of settlement bar under Ninth Circuit law in connection with evaluating receiver's potential claims	2.00	680.00
11/03/22	Kyle Ewing	Telephonic conference with class action counsel from ancillary proceeding (J. Kellogg) re: potential common interest agreement (1.1); follow-up with K. Hendricks re: the same (.2)	1.30	442.00
11/03/22	Kyle Ewing	Research and evaluate procedural options for regarding ancillary proceedings (1.3); review Allen Matkins' draft joint prosecution/common interest agreement in connection with the same (.2)	1.50	510.00
11/03/22	Kara B. Hendricks	Respond to C. Ney inquiry regarding compliance letters to defendants that are not represented;	0.10	48.03

11/03/22	Kara B. Hendricks	Attention to emails and documents from D. Zaro and Steward title relating to transfer tax on properties (.2) Request D. Edington's assistance in evaluation and follow-up of transfer issue and get guidance on property issues and dealings with records office (.4); Email Clark County recorders office to schedule time to discuss same (.2);	0.80	384.20
11/03/22	Kara B. Hendricks	Attention to email from A. Deering with lists of property that has yet to be turned over and inquire regarding scope of new turnover request;	0.10	48.03
11/03/22	Kara B. Hendricks	Telephone call with J. Kellogg and J. Schnider ancillary matter (.6); Respond to email from S. Mirkovich regarding status (.1); Discuss pending available options with K. Ewing and prepare email to G. Winkler regarding same (.1);	0.80	452.00
11/03/22	Kara B. Hendricks	Attention to email from D. Clukey with updated investor information and inquiry regarding settlement and follow-up with T. Combs and C. Fronk;	0.50	240.13
11/03/22	Kara B. Hendricks	Attention to email from A. Deering regarding GoldWynn condo and follow-up;	0.10	48.03
11/03/22	Kara B. Hendricks	Telephone call with E. Smith regarding South Lake Tahoe property and recession of notice of default and respond to follow-up email (.4); Request J. McGraw assistance with new questions raised by lenders counsel (.1);	0.50	240.13
11/03/22	Cynthia L. Ney	Communications with Matt Pham regarding financial records received from Shane Jager and Stirling Consulting.	0.10	17.50
11/03/22	Cynthia L. Ney	Review and organization of documentation forwarded by Jason Jongeward, update chart and communications with Jongeward regarding missing materials.	0.90	157.50
11/03/22	Cynthia L. Ney	Analysis of documentation forwarded by D.Clukey regarding Johnson Funds and provide same to K.Hendricks.	0.30	52.50
11/03/22	Christian Spaulding	Communications with team regarding documents and information obtained to date regarding Goldwynn condo in Bahamas (Judd).	0.40	127.50
11/05/22	Kara B. Hendricks	Review reply in support of fees filed by R. Madsen and correspond with G. Winkler regarding same and lack of opposition by A. Grisgby to motion to compel;	0.20	96.05
11/05/22	Kara B. Hendricks	Attention to email with new bank statements from J. Humphries and forward to team for review;	0.10	48.03
11/05/22	Kara B. Hendricks	Review new information from A. Deering regarding Goldwynn condo;	0.10	48.03
11/07/22	Kara B. Hendricks	Email S. Walker regarding North Dakota tax foreclosure based and follow-up on information provide by G. Winkler;	0.20	96.05

11/07/22	Kara B. Hendricks	Review correspondence from D. O'Toole regarding requested documents and follow-up with C. Ney regarding downloading process;	0.10	48.03
11/07/22	Kara B. Hendricks	Attention to email from L. Jeffery with bank statements;	0.10	48.03
11/07/22	Kara B. Hendricks	Respond to email from J. Giardino regarding Madsen documents;	0.10	48.03
11/07/22	Kara B. Hendricks	Respond to email from R. Goodman regarding L. Jeffrey documents;	0.10	48.03
11/07/22	Kara B. Hendricks	Attention to email from J. Humphries with bank statements;	0.10	48.03
11/07/22	Kara B. Hendricks	Respond to email from C. Spaulding regarding notice non-opposition to motion to compel and attaching new text messages;	0.10	48.03
11/07/22	Christian Spaulding	Evaluate Madsen's Reply to Motion to Clarify and to Retain Fees	0.40	127.50
11/07/22	Christian Spaulding	Confer with team regarding passed deadline for Paula Beasley and Aaron Grigsby to respond to Motion to Compel.	0.20	63.75
11/07/22	Christian Spaulding	Draft Notice of Non-Opposition and Proposed Order regarding Motion to Compel Paula Beasley and Aaron Grigsby.	1.20	382.50
11/08/22	Kyle Ewing	Begin reviewing/analyzing P. Beasley's opposition to the receiver's motion to compel/for contempt in connection with analyzing the receiver's reply strategy; review appointment order and other relevant pleadings in connection with the same	0.30	102.00
11/08/22	Kara B. Hendricks	Attention to emails and information regarding J&J Consulting Services information on Secretary State and follow-up with Z. Jordan for assistance to update same;	0.50	240.13
11/08/22	Kara B. Hendricks	Respond to email from D. O'Toole regarding documents (.1);	0.10	48.03
11/08/22	Kara B. Hendricks	Provide E. Smith additional information requested regarding Lucerene property;	0.20	96.05
11/08/22	Kara B. Hendricks	Respond to email from J. McGraw regarding Clark County tax concerns (.1); Follow-up with Recorders office to schedule call to discuss (.1);	0.20	96.05
11/08/22	Kara B. Hendricks	Attention to email from D. Clukey regarding Johnson commission analysis and follow-up with G. Winkler regarding same;	0.30	144.08
11/08/22	Kara B. Hendricks	Attention to email from counsel for L. Jeffrey certified statements and tax information;	0.10	48.03
11/08/22	Kara B. Hendricks	Review Grigsby response to motion to compel and correspond with C. Spaulding regarding preparation of response to same;	0.30	144.08
11/08/22	Kara B. Hendricks	Attention to emails regarding Canvas Edge and Via Regina properties;	0.10	48.03
11/08/22	Kara B. Hendricks	Review emails and prepare time line	0.60	288.15

		regarding Goldwynn condo and share with D. Baddley, T. Combs, and C. Fronk;		
11/08/22	Kara B. Hendricks	Attention to email from J. Giardino and follow-up with G. Winkler regarding same;	0.10	48.03
11/08/22	Cynthia L. Ney	Compilation and forwarding of financials received from Larry Jeffery to A.Deering.	0.30	52.50
11/08/22	Christian Spaulding	Correspondence with team regarding Response to Motion to Compel filed by P. Beasley and Aaron Grigsby.	0.20	63.75
11/09/22	Kyle Ewing	Review and analyze P. Beasley's opposition to the receiver's motion to compel/for contempt in connection with analyzing the receiver's reply strategy; review appointment order and other relevant pleadings in connection with the same; research law in connection with the same	1.70	578.00
11/09/22	Kyle Ewing	Participate in weekly conference with G. Winkler/AFS team, J. delCastillo/Allen Matkins team, and K. Hendricks to discuss status of efforts to marshal assets, investigate claims belonging to receivership estate, and discuss status of litigation matters, including formal dismissal of bankruptcy proceedings	0.80	272.00
11/09/22	Kara B. Hendricks	Attention to email from M. Enriquez regarding Seybert sale of franchise rights and related follow-up (.3); Follow-up with L. Maningo regarding same(.1); Update M. Enriquez (.2);	0.60	288.15
11/09/22	Kara B. Hendricks	Discuss Grigsby response and issues to include in reply with C. Spaulding;	0.20	96.05
11/09/22	Kara B. Hendricks	Correspond with E. Smith regarding 548 Lucerene property and removal of notice of default;	0.10	48.03
11/09/22	Kara B. Hendricks	Receivership team call (with G. Winkler, J. Hall, A. Deering, J. McGraw, J.del Catillo, D. Zaro, M. Pham, K. Ewing) to discuss forensic accounting, asset recovery (personal and real property), pending motions, defendant investments and recovery potential;	0.90	432.23
11/09/22	Kara B. Hendricks	Attention to email from A. Deering regarding J&J Consulting corporate documents and request Z. Jordan's assistance with preparation of same;	0.10	48.03
11/09/22	Kara B. Hendricks	Attention to emails regarding S. Johnson savings account and transfer of funds (.1); Review stipulation and follow-up with J. del Castillo regarding same (.2); Send email to E. Bisson with copy of stipulation/order and clarifying issue to be addressed regarding S. Johnson account (.2);	0.50	240.13
11/09/22	Kara B. Hendricks	Respond to email from Neila regarding meeting with Clark County recorders office and update team working on property	0.10	48.03

11/09/22	Cynthia L. Ney	transfer documents; Analysis and electronic organization of financial records received from defendant Jongeward and forwarding of same to A.Deering.	0.60	105.00
11/09/22	Cynthia L. Ney	Analysis and organization of J.Jongeward tax returns (.5) update chart of records (.2); compilation and forwarding of J.Jongeward tax documentation to A.Deering (.2).	0.90	157.50
11/09/22	Christian Spaulding	Evaluate P. Beasley Response to Motion to Compel and begin analysis and draft of Reply in Support.	3.30	1,051.88
11/10/22	Kyle Ewing	Email communication with G. Winkler and J. delCastillo (Allen Matkins) re: liquidation of crypto-currency; review appointment order and motion for instructions regarding sale of personal property in connection with the same	0.60	204.00
11/10/22	Kyle Ewing	Review and analyze the SEC's response to the receiver's motion for turnover of receivership assets seized by FBI during its execution of search warrants, including its stipulation re: cash with C. Humphries and J. Humphries	0.40	136.00
11/10/22	Kara B. Hendricks	Attention to email from G. Winkler regarding proof of claim relating to action against Wells Fargo and review information on Pacer regarding filing;	0.20	96.05
11/10/22	Kara B. Hendricks	Follow-up with J. Giardino to schedule a call with C. Madsen and review email from G. Winkler regarding same;	0.20	96.05
11/10/22	Kara B. Hendricks	Attention emails regarding expert report provided by D. Clukey and initial analysis of amounts owed by defendants;	0.20	96.05
11/10/22	Kara B. Hendricks	Follow-up with J. Kellogg regarding draft agreement;	0.10	48.03
11/10/22	Kara B. Hendricks	Attention to email and documents regarding Eco Battery provided by J. Jongeward;	0.10	48.03
11/10/22	Kara B. Hendricks	Respond to email from E. Bisson regarding transfer from Chase;	0.10	48.03
11/10/22	Kara B. Hendricks	Follow-up with C. Fronk and T. Combs regarding pending matters and meeting prior to scheduled hearing;	0.10	48.03
11/10/22	Kara B. Hendricks	Follow-up with G. Winkler and J. Hall regarding demands for turnover and initial reconciliation of records showing amount brought in by each defendant;	0.20	96.05
11/10/22	Cynthia L. Ney	Analysis and electronic organization of EcoBattery documentation.	0.30	52.50
11/10/22	Cynthia L. Ney	Analysis and comparison of Richard Madsen financial records received today and previously (1.4); communications with counsel for Madsen (.1).	1.50	262.50
11/10/22	Christian Spaulding	Continue draft of Reply in Support of Motion to Compel Grigsby and P. Beasley	2.90	924.38
11/11/22	Kara B. Hendricks	Attention to emails regarding R. Tanner	0.10	48.03

11/11/22	Kara B. Hendricks	documents and payments; Work with C. Spaulding to outline and address issues for reply in support of motion to compel and declarations in support of same;	0.30	144.08
11/11/22	Kara B. Hendricks	Review email from K. Chippoletti regarding documents and information needed from her client;	0.10	48.03
11/11/22	Kara B. Hendricks	Correspond with T. Combs regarding upcoming hearing;	0.10	48.03
11/11/22	Christian Spaulding	Evaluate additional filing by P. Beasley and A. Grigsby for differences.	0.50	159.38
11/11/22	Christian Spaulding	Confer with K. Hendricks regarding declaration in support of Reply brief and draft declaration for Vegas Auto Gallery.	0.50	159.38
11/11/22	Christian Spaulding	Continue draft of Reply in Support of Motion to Compel P. Beasley and Aaron Grigsby.	6.80	2,167.50
11/13/22	Kara B. Hendricks	Attention to emails and forms to update J&J filings with the Secretary of State;	0.30	144.08
11/13/22	Kara B. Hendricks	Attention to Response filed by US attorneys office to motion for turnover and stipulation filed related to Humphries turnover;	0.20	96.05
11/13/22	Christian Spaulding	Continue draft of Reply brief in support of P. Beasley Motion to Compel. Communications with P. Beasley regarding the same.	3.30	1,051.88
11/14/22	David Edington	Prepare for and attend call with county recorder's office.	0.30	155.55
11/14/22	Kyle Ewing	Review and revise comments to reply in support of motion for contempt w/r/t P. Beasley and/or A. Grigsby in connection with finalizing the same and preparing for tomorrow's status check before the Court	0.30	102.00
11/14/22	Kara B. Hendricks	Telephone call with C. Hill and C. Goodin from Clark County Recorders office and prepare detailed email with supporting documents to District Attorney C. Jorgensen to further discuss resolution to transfer tax concern;	0.80	384.20
11/14/22	Kara B. Hendricks	Revise amended Winkler declaration in support of reply to motion to compel and send for comment;	0.20	96.05
11/14/22	Kara B. Hendricks	Review and revise reply in support of motion to compel Paula Beasley and A. Grigsby;	3.80	1,824.95
11/14/22	Kara B. Hendricks	Telephone call with C. Jorgensen regarding tax transfer tax and opinions and authorities regarding same;	0.30	144.08
11/14/22	Kara B. Hendricks	Revise declaration for B. Pride-Zorn and email draft for review and approval;	0.30	144.08
11/14/22	Kara B. Hendricks	Attention to stipulation to facilitate sale of Sky Arc property and finalize same;	0.20	96.05
11/14/22	Cynthia L. Ney	Review secretary of state annual report and registered agent documentation regarding J&J Consulting and communications with	0.30	52.50

		K.Hendricks regarding same.		
11/14/22	Christian Spaulding	Incorporate declaration of Blake Pride-Zorn into Reply in Support of Motion to Compel. Gather all exhibits and prepare for filing.	0.40	127.50
11/14/22	Christian Spaulding	Finalize draft of Amended Declaration of Geoff Winkler in Support of Motion to Compel per comments by client.	0.20	63.75
11/14/22	Christian Spaulding	Revise draft of Reply in Support of Motion to Compel per comments by client.	1.30	414.38
11/14/22	Christian Spaulding	Proofread and finalize the same.		
11/14/22	Christian Spaulding	Evaluate United States' Response for Motion for Turnover Order of Receivership Property (ECF NO. 319).	0.20	63.75
11/14/22	Christian Spaulding	Draft Amended Declaration of Geoff Winkler in support of Motion to Compel	0.60	191.20
11/15/22	Kara B. Hendricks	Re: Paula Beasley and Aaron Grigsby. Meet with T. Combs, C. Fronk, G. Winkler and J. Hall to discuss status of receivership including communication with defendants and asset recovery efforts and discuss case procedural issues;	1.30	623.83
11/15/22	Kara B. Hendricks	Attend status hearing and debrief with G. Winkler regarding next steps and timelines discussed at hearing;	2.20	1,056.55
11/15/22	Kara B. Hendricks	Prepare summary to team of discussions with District Attorney regarding transfer tax and available options;	0.20	113.00
11/15/22	Kara B. Hendricks	Finalize reply in support of motion to compel including review and finalizing exhibits;	0.90	432.23
11/15/22	Cynthia L. Ney	Update forms for J&J Consulting annual report and communications with Secretary of State regarding same.	0.30	52.50
11/16/22	Kyle Ewing	Conference with potential receiver conflict counsel for ancillary litigation with K. Hendricks (GT) and G. Winkler (AFS)	0.90	306.00
11/16/22	Kyle Ewing	Review draft engagement letter for receiver conflict counsel for litigation in preparation for discussion of the same with G. Winkler (AFS) and K. Hendricks (GT); follow-up with K. Hendricks	0.40	136.00
11/16/22	Kyle Ewing	Review/provide edits and comments to receiver's reply in support of motion to turnover assets seized by FBI	0.60	204.00
11/16/22	Kara B. Hendricks	Call with G. Winkler, K. Ewing and counsel being considered for class action related matters;	0.60	288.15
11/16/22	Kara B. Hendricks	Respond to email from D. Clukey regarding Rohner and Johnson;	0.30	144.08
11/16/22	Kara B. Hendricks	Attention to common interest agreement, joint prosecution agreement and draft engagement letter and provide comments to G. Winkler regarding same;	0.90	432.23
11/16/22	Kara B. Hendricks	Prepare Reply in support of motion for turnover of Judd assets seized by FBI;	1.20	576.30
11/16/22	Kara B. Hendricks	Respond to email from L. Maningo	0.10	48.03

11/16/22	Kara B. Hendricks	regarding Rosegreen new account; Participate in call with Receivership team (G. Winkler, J. Hall, A. Deering, J. McGraw, D. Zaro, J. delCastillo, K. Ewing and others) for update regarding asset recover efforts, forensic accounting, motions and related matters;	1.00	480.25
11/16/22	Kara B. Hendricks	Telephone call from L. Maningo regarding Rosegreen account issues and status of Seybert negotiations;	0.20	96.05
11/16/22	Cynthia L. Ney	Analysis of financial documents provided and preparation of spreadsheet of same.	1.80	315.00
11/16/22	Cynthia L. Ney	Communications with Nevada Secretary of State and K.Hendricks regarding annual report and registered agent changes for J&J Consulting.	0.30	52.50
11/17/22	Kyle Ewing	Review and analyze order granting motion to compel turnover of funds held by K. Dean issued by receivership court today	0.40	136.00
11/17/22	Kyle Ewing	Begin drafting letter to attorney general's office requesting opinion on application of transfer tax framework to transfers to real property by a court-appointed receiver in connection with avoiding double-taxation; research law in connection with the same	5.00	1,700.00
11/17/22	Kara B. Hendricks	Attention to email from L. Maningo regarding Seybert account transfer and follow-up with J. delCastillo and G. Winkler regarding same;	0.20	96.05
11/17/22	Kara B. Hendricks	Follow-up with G. Winkler regarding reply in support of turnover motion;	0.20	96.05
11/17/22	Kara B. Hendricks	Call with D. Clukey regarding Rohner and Johnson and pending issues include concerns regarding fees;	0.60	288.15
11/17/22	Kara B. Hendricks	Strategize with K. Ewing regarding request for opinion from attorney general's office on transfer tax issue;	0.30	144.08
11/17/22	Kara B. Hendricks	Review order on K. Dean motion to compel and request C. Spaulding prepare memorandum of fees;	0.30	144.08
11/17/22	Cynthia L. Ney	Analysis of financial documents provided and preparation of spreadsheet of same.	1.50	262.50
11/17/22	Cynthia L. Ney	Call to Secretary of State regarding status of annual report and registered agent filing for J&J Consulting and review documentation forwarded from Secretary of State.	0.40	70.00
11/17/22	Christian Spaulding	Review order granting Motion to Compel Re: Kamille Dean. Emails with team regarding the same.	0.40	127.50
11/18/22	Kara B. Hendricks	Follow-up with G. Winkler regarding call with J. Giardino re C. Madsen;	0.10	48.03
11/18/22	Kara B. Hendricks	Follow-up with D. Hollingsworth re: asset turnover;	0.10	48.03
11/18/22	Kara B. Hendricks	Correspond with M. Barkhanoey regarding asset list;	0.20	96.05
11/18/22	Kara B. Hendricks	Telephone call from K. Hyson regarding K.	0.60	288.15

11/18/22	Kara B. Hendricks	Dean payment and fees and follow-up with G. Winkler (.4); Request C. Spaulding determine amount of fees given offer made (.1); Respond to K. Hyson email (.1);	0.10	48.03
11/18/22	Cynthia L. Ney	Correspond with C. Ney and request her assistance to identify parties that failed to respond to request for certified statements and tax returns;		
11/18/22	Cynthia L. Ney	Email communications regarding supplemental financials received from defendants (.2); compilation and forwarding of financials to A.Deering and M.Pham (.5); communications with K.Hendricks regarding same (.1).	0.80	140.00
11/18/22	Cynthia L. Ney	Review documentation produced and prepare letters to Beasley, Judd and counsel regarding tax returns, etc. (.6); communications with K.Hendricks regarding same (.1).	0.70	122.50
11/18/22	Cynthia L. Ney	Analysis of documentation provided in response to letters re tax returns and certified statements and update chart (1.6); organize documents received (.3)	1.90	332.50
11/21/22	Kara B. Hendricks	Review email from J. Kellogg and follow-up with team regarding bank records.	0.30	144.08
11/21/22	Kara B. Hendricks	Review emails regarding sale of Via Regina property and follow-up with G. Winkler and A. Deering regarding procedure;	0.10	48.03
11/21/22	Kara B. Hendricks	Follow-up with K. Dean counsel regarding payment(.1); Correspond with G. Winkler and team regarding same (.1);	0.20	96.05
11/21/22	Kara B. Hendricks	Multiple emails regarding call with J. Giardino re: C. Madsen;	0.10	48.03
11/21/22	Kara B. Hendricks	Attention to emails regarding Via Regina property and review ownership documents (.3); Follow-up with A. Deering and D. Zaro regarding options (.1);	0.40	192.10
11/21/22	Kara B. Hendricks	Telephone call to D. Hollingsworth regarding forfeiture;	0.10	48.03
11/21/22	Kara B. Hendricks	Attention to emails and documents regarding Sky Arc sale and disbursement instructions and correspond with A. Deering regarding same;	0.30	144.08
11/21/22	Christian Spaulding	Evaluate invoices and begin draft of Memorandum of Fees incurred in seeking to work with Kamille Dean and motions related to the same.	2.50	796.88
11/22/22	Kyle Ewing	Review communications with A. Grigsby (counsel for P. Beasley) and Receiver team re: Beasley's stipulation to sale of via Regina property and conference with K. Hendricks re: the same (0.4); telephonic communication with K. Hendricks and J. Jongeward re: issues with Mountain America bank accounts (0.2); telephonic conference with K. Hendricks and G.	0.70	238.00

11/22/22	Kyle Ewing	Winkler re: both issues (0.1) Continue drafting letter to attorney general's office requesting opinion on application of transfer tax framework to transfers to real property by a court-appointed receiver in connection with avoiding double-taxation; further legal research in connection with the same	5.70	1,938.00
11/22/22	Kara B. Hendricks	Correspond with G. Winkler and Allen Matkins team regarding sale of Mt. Charleston property and stipulation to facilitate the same (.2); Research issues relating to ownership based on Beasley divorce and Nevada law regarding receiver ability to sign documents (.7);	0.90	432.23
11/22/22	Kara B. Hendricks	Follow-up with C. Spaulding regarding memo for fees relating to Dean Motions and respond to inquiries regarding same;	0.30	144.08
11/22/22	Kara B. Hendricks	Review email from K. Hyson regarding K. Dean payment;	0.10	48.03
11/22/22	Kara B. Hendricks	Revise stipulation for sale of Via Regina property and prepare email to A. Grigsby regarding same;	1.30	624.33
11/22/22	Kara B. Hendricks	Telephone call from J. Jongeward regarding frozen account and follow-up relating to same;	0.20	96.05
11/22/22	Kara B. Hendricks	Send email to D. Hollingsworth regarding turnover;	0.10	48.03
11/22/22	Kara B. Hendricks	Correspond via email with J. Rickard regarding research on elisor concept in Nevada;	0.10	48.03
11/22/22	Kara B. Hendricks	Telephone call with G. Winkler regarding pending issues including sale of property and J. Jongeward requests;	0.30	144.08
11/22/22	Kara B. Hendricks	Follow-up with K. Ewing regarding request to Attorney General regarding tax transfer issues;	0.20	96.05
11/22/22	Christian Spaulding	Continue evaluation of relevant authority regarding recoverable fees and draft of Memorandum of Fees in support of fee request related to Kamille Dean.	3.60	1,147.50
11/23/22	Kyle Ewing	Review K. Hendrick's draft email to A. Grigsby (counsel for P. Beasley) re: Paula signing stipulation to sell via Regina property; revise the same and send to Grigsby; conference with K. Hendricks re: the same	0.50	170.00
11/23/22	Kyle Ewing	Review and revise draft stipulation to sell via Regina property in preparation for sending the same to A. Grigsby; conference with K. Hendricks re: the same	0.40	136.00
11/23/22	Kyle Ewing	Continue drafting letter to attorney general's office requesting opinion on application of transfer tax framework to transfers to real property by a court-appointed receiver in connection with avoiding double-taxation; continue	0.80	272.00

		researching law in conjunction with the same		
11/23/22	Kara B. Hendricks	Confer with K. Ewing to finalize stipulation and correspondence to A. Grigsby regarding sale of Via Regina;	0.20	96.05
11/23/22	Kara B. Hendricks	Follow-up with K. Ewing regarding research on transfer tax issues and letter to AG's office (.3); Email A. Levine regarding AG procedural issues (.1);	0.40	192.10
11/23/22	Kara B. Hendricks	Get update from G. Winkler and J. McCray regarding Utah property sale concerns;	0.20	96.05
11/23/22	Christian Spaulding	Evaluate relevant case law regarding reasonable fees awarded to receivers in similar cases for inclusion in Memorandum of Fees in Support of Receiver's Request for Attorneys' Fees Incurred with respect to Kamille Dean.	2.30	733.13
11/23/22	Christian Spaulding	Continue draft of Memorandum of Fees in Support of Request for Attorneys' Fees and Costs Incurred with respect to Kamille Dean.	2.40	765.00
11/25/22	Christian Spaulding	Continue draft of Memorandum of Fees related to efforts to recover funds from Kamille Dean and communications with team regarding the same.	3.30	1,051.88
11/28/22	Kyle Ewing	Finish drafting letter to attorney general's office requesting opinion on application of transfer tax framework to transfers to real property by a court-appointed receiver in connection with avoiding double-taxation; review/revise the same and provide to K. Hendricks for her review	6.70	2,278.00
11/28/22	Kara B. Hendricks	Attention to email from A. Grigsby regarding stipulation and follow-up with G. Winkler (.3); Update stipulation and send to G. Ogata requesting assistance in obtaining signatures (.5);	0.80	384.20
11/28/22	Kara B. Hendricks	Review discovery propounded in class action matter and objections and correspond with J. Kellogg regarding same;	0.70	336.18
11/28/22	Kara B. Hendricks	Review and revise memo of fees and costs relating to Dean motion to compel and forward draft to G. Winkler and D. Zaro for review and comment;	0.90	432.23
11/28/22	Kara B. Hendricks	Telephone call with J. Giardino and G. Winkler regarding C. Madsen matters;	0.30	144.08
11/28/22	Kara B. Hendricks	Correspond with J. del Castillo regarding Dean fee recovery motion;	0.10	48.03
11/29/22	Kyle Ewing	Further review and revisions of letter to attorney general's office requesting opinion on application of transfer tax framework to transfers to real property by a court-appointed receiver to address comments/edits of D. Zaro; email communication with K. Hendricks re: the same	0.30	102.00
11/29/22	Kyle Ewing	Review and analyze order denying motion	0.40	136.00

		to intervene and court's analysis of intervenors' arguments re: the in pari delicto doctrine		
11/29/22	Kyle Ewing	Review/revise letter to attorney general's office requesting opinion on application of transfer tax framework to transfers to real property by a court-appointed receiver to address comments/edits of K. Hendricks; email communication with AFS (G. Winkler) and AM (D. Zaro) re: the same	0.90	306.00
11/29/22	Kyle Ewing	Review and analyze in pari delicto memo - further legal research based on the same; conference with K. Hendricks re: the same	1.30	442.00
11/29/22	Kyle Ewing	Conduct county recorder search for "M&P Holdings LLC"; email communication with G. Winkler and C. Ney re: the same	0.30	102.00
11/29/22	Kara B. Hendricks	Telephone call to C. Newby and D. Pope at the AG's office to discuss transfer tax issue (.3); Discuss tax issue and procedural concerns with M. Ferrario (.2)	0.50	240.13
11/29/22	Kara B. Hendricks	Correspond with G. Winkler regarding pending issues including proposed conflict counsel, asset turnover, and pending issues;	0.30	144.08
11/29/22	Kara B. Hendricks	Review and revise draft retainer, common interest and joint prosecution agreement relating to ancillary proceedings and forward to G. Winkler and Allen Matkins team to review;	1.10	528.28
11/29/22	Kara B. Hendricks	Revise draft letter outlining transfer tax issues seeing AG's opinion (.7); Telephone call to G. Ott to discuss same (1); Review updates and follow-up with K. Ewing to finalize (.1);	0.90	432.23
11/29/22	Kara B. Hendricks	Request C. Spaulding prepare letter regarding Jongeward frozen account;	0.20	96.05
11/29/22	Kara B. Hendricks	Request C. Ney's assistance with identifying seized assets and forward same to G. Winkler;	0.20	96.05
11/29/22	Kara B. Hendricks	Follow-up with G. Winkler regarding information requested by proposed conflict counsel (.2); Respond to email from and provide additional information and prior research (.3);	0.50	240.13
11/29/22	Kara B. Hendricks	Follow-up with J. del Castillo regarding information needed to finalize memo of fees related to Dean Motion to Compel (.1); Respond to C. Ney inquiries regarding exhibits and redactions needed for filing of same (.1);	0.10	48.03
11/29/22	Kara B. Hendricks	Call with D. Hollingsworth regarding turnover of seized items;	0.10	48.03
11/29/22	Kara B. Hendricks	Respond to email from A. Deering regarding sale of Canvas edge and stipulation to facilitate same;	0.10	48.03
11/29/22	Kara B. Hendricks	Review stipulation to correct error in Dean turnover order;	0.10	48.03
11/29/22	Kara B. Hendricks	Correspond via email with A. Deering and	0.40	192.10

		D. Zaro regarding sale of Mt. Charleston property and issues getting stipulation signed (.2); Email T. Combs and C. Fronk regarding proposed sale and provide background and draft stipulation (.2);		
11/29/22	Cynthia L. Ney	Review file, compile and forward seizure documentation to K.Hendricks.	0.20	35.00
11/29/22	Cynthia L. Ney	Research and summary of properties and lawsuits involving M&P Properties (.7); research Secretary of State listing for M&P Properties and MP Properties (.2); communications with K.Ewing regarding same (.1).	1.00	175.00
11/29/22	Cynthia L. Ney	Analysis and redacting of invoices in support of fee request regarding K.Dean motions (1.1); analysis and editing of motion (.6); communications with C.Spaulding and K.Hendricks regarding same (.2).	1.90	332.50
11/29/22	Christian Spaulding	Confer with team regarding invoice entries demonstrating fees incurred in relation to Kamille Dean motion and compliance with Receivership Orders.	0.30	95.63
11/29/22	Christian Spaulding	Communications with K. Hendricks regarding Jongeward account at Mountain Am. Credit Union.	0.20	63.75
11/30/22	Kyle Ewing	Review Accurant and TLO reports re: M&P Holdings, an entity purportedly organized by Beasleys to hide real property; email communication with C. Ney and K. Hendricks re: the same	0.50	170.00
11/30/22	Kyle Ewing	Telephonic conference with potential contingency counsel for ancillary proceedings, G. Winkler (AFS), and K. Hendricks (GT); follow-up with K. Hendricks	0.90	306.00
11/30/22	Kyle Ewing	Review letter from S. Lowenstein to GT re: his concerns re: his client, who is a purported J&J investor based in Indiana, and information re: Madsen	0.10	34.00
11/30/22	Kyle Ewing	Weekly conference with GT (K. Hendricks), AFS (G. Winkler and others), and AM (J. delCastillo, M. Pham, and D. Zaro) re: receivership progress, including ongoing efforts to obtain attorney funds and other receivership property; ancillary proceedings; sales of real property; and other receivership assets; follow-up with K. Hendricks	1.10	374.00
11/30/22	Kyle Ewing	Begin researching law in support of motion to employ conflicts counsel for ancillary proceedings	0.20	68.00
11/30/22	Kara B. Hendricks	Participate in team meeting to review asset recover efforts, forensic account status, bank records, concerns faced with turnover and outline and divide next steps (G. Winkler, J. Hall, A. Deering, J. McGraw,	1.00	480.25

		K. Ewing, D. Zaro, J. delCastillo participating);		
11/30/22	Kara B. Hendricks	Telephone call with G. Ott regarding transfer tax issues;	0.30	144.08
11/30/22	Kara B. Hendricks	Attention to emails from K. Ewing and C. Ney regarding newly identified Beasley entities and research regarding same;	0.10	48.03
11/30/22	Kara B. Hendricks	Review and revise correspondence seeking Beasley tax documents;	0.10	48.03
11/30/22	Kara B. Hendricks	Review order on withdrawal of counsel for K. Dean;	0.10	48.03
11/30/22	Kara B. Hendricks	Follow-up with K. Ewing regarding finalizing tax transfer letter and next steps;	0.20	96.05
11/30/22	Kara B. Hendricks	Review correspondence from Solomon Lownstein regarding Madsen investor and follow-up with A. Deering regarding response to same;	0.10	48.03
11/30/22	Kara B. Hendricks	Review draft letter to J. Judd regarding missing documents and follow-up with C. Ney regarding same;	0.10	48.03
11/30/22	Kara B. Hendricks	Call with G. Winkler, K. Ewing and LSKLSG regarding proposal and documents need to evaluate and pursue claims;	0.50	240.13
11/30/22	Kara B. Hendricks	Confer with G. Winkler regarding J. Kellogg proposal and related issues;	0.30	144.08
11/30/22	Kara B. Hendricks	Attention to memorandum of costs related to Dean Motions and work with C. Spaulding to finalize same;	0.20	96.05
11/30/22	Cynthia L. Ney	Compilation and forwarding to team of deed for Sun Valley possibly owned by M&P Properties.	0.30	52.50
11/30/22	Christian Spaulding	Revise draft of Memorandum of Fees related to recovery efforts directed to Kamilie Dean to reflect information provided by Allen Matkins. Draft declarations of Kara Hendricks and Joshua A. del Castillo in support thereof.	3.80	1,211.25
11/30/22	Christian Spaulding	Review correspondence from Indiana counsel regarding aggrieved investor's request for information.	0.20	63.75
11/30/22	Christian Spaulding	Evaluate correspondence from counsel for Nevada Trust Deed Services regarding Ruffian property.	0.20	63.75
11/30/22	Christian Spaulding	Confer with accounting regarding work in progress to be submitted.	0.20	63.75
			<hr/>	
			Total Hours:	149.80
			Total Amount:	\$ 54,100.77

TIMEKEEPER SUMMARY FOR TASK CODE GW001,

ASSET ANALYSIS AND RECOVERY

Summary of Fees (Base Rates)

<u>Timekeeper Name</u>	<u>Hours Billed</u>	<u>Base Rate</u>	<u>Total \$ Amount</u>
David Edington	0.30	610.00	183.00
Kara B. Hendricks	49.00	565.00	27,685.00
Kyle Ewing	40.80	400.00	16,320.00
Christian Spaulding	41.80	375.00	15,675.00
Cynthia L. Ney	17.90	295.00	5,280.50
Totals:	149.80		\$ 65,143.50

Summary of Fees (Discounted Rates)

<u>Timekeeper Name</u>	<u>Hours Billed</u>	<u>Average Discounted Rate</u>	<u>Total \$ Amount</u>
David Edington	0.30	518.50	155.55
Kara B. Hendricks	49.00	481.98	23,616.97
Kyle Ewing	40.80	340.00	13,872.00
Christian Spaulding	41.80	318.75	13,323.75
Cynthia L. Ney	17.90	175.00	3,132.50
Totals:	149.80		\$ 54,100.77

TASK CODE: GW004 CASE ADMINISTRATION

<u>DATE</u>	<u>TIMEKEEPER</u>	<u>DESCRIPTION</u>	<u>HOURS</u>	<u>AMOUNT</u>
11/08/22	Zaniah A. Jordan	Research regarding requirements for annual list, how long J&J as been delinquent; draft correspondence regarding the same	0.30	94.35
11/11/22	Kara B. Hendricks	Follow up with Z. Jordan regarding updating information with secretary of state and request C. Ney's assistance with same;	0.20	96.05
11/11/22	Zaniah A. Jordan	Review draft of amended list	0.20	62.90
11/11/22	Cynthia L. Ney	Research Nevada Secretary of State filings for J&J Consulting (.2); preparation of annual report and registered agent filings changing to G.Winkler (.1.3); call to Maria at Cogency Global regarding acting as recipient for registered agent (.2); communications with K.Hendricks (.2).	1.90	332.50
11/14/22	Kara B. Hendricks	Work with E. Escobar-Gaddi to facilitate document filing with Secretary of State to bring J&J current;	0.20	96.05
11/15/22	Kyle Ewing	Review/analyze eDiscovery and hosting proposal from Disco eDiscovery, proposal from Holo eDiscovery previously analyzed, proposal from Aitheras eDiscovery, and emails from D. Zaro re: the same; draft memo email and spreadsheet modeling costs with various vendors in conjunction with the same	2.20	748.00
11/16/22	Kyle Ewing	Telephonic conference with AFS (A. Deering, J. Hall, and G. Winkler), GT (K. Hendricks), and AM (J. delCastillo and D. Zaro) re: receivership progress including eDiscovery vendor selection, ongoing efforts to secure/market real and personal property, ancillary litigation, and other issues	1.00	340.00
11/16/22	Kyle Ewing	Finish reviewing/analyzing eDiscovery and hosting proposal from Disco eDiscovery, proposal from Holo eDiscovery previously analyzed, proposal from Aitheras eDiscovery, and emails from D. Zaro re: the same; review, revise, and send memo email re: the same	0.50	170.00
11/17/22	LAC GROUP LAC GROUP	Conduct research to obtain the version of Title 11, Sec 506, subdivision 3 that was available in 1967; utilizing Lexis, Westlaw, and Hein; for K Ewing.	1.00	187.00
11/17/22	LAC GROUP LAC GROUP	Research and retrieve 11 U.S.C. § 1 from 1964 stating the definition of "Corporation"; utilizing HeinOnline and the Internet; for K. Ewing.	1.25	233.75
11/18/22	Kara B. Hendricks	Follow-up regarding Secretary of State filing and Resident Agent issues;	0.10	48.03
11/18/22	Kara B. Hendricks	Follow-up regarding new resident agent	0.10	48.03

11/18/22	Cynthia L. Ney	request; Complete forms for registered agent designation and forwarding of same to Cogency Global to confirm representation of J&J Consulting (.4); communications with team regarding same (.1).	0.50	87.50
11/21/22	Kara B. Hendricks	Attention to investor update and correspond with A. Deering regarding same;	0.10	48.03
11/23/22	Kyle Ewing	Update spreadsheet comparing eDiscovery vendor quotes to include latest pricing from Aitheras in preparation for team call with Aitheras	0.20	68.00
11/23/22	Kyle Ewing	Participate in team conference with Aitheras eDiscovery vendor, K. Hendricks (GT), Allen Matkins (J. delCastillo) and AFS team (A. Deering, J. McGraw, and J. Hall); follow-up with K. Hendricks	0.70	238.00
11/23/22	Kara B. Hendricks	Participate in call with Aitheras regarding IT and data options (G. Winkler, J. Hall, J. Del Castillo, K. Ewing, A. Deering other participants);	0.70	336.18
11/23/22	Akke Levin	Receive request from Kara Hendricks re attorney general opinion and inquire into options related to same and provide input for same.	0.40	187.00
11/29/22	Kara B. Hendricks	Attention to email from L. Milstein regarding platform to use for documents and follow-up with IT department regarding same;	0.10	48.03
11/29/22	Kara B. Hendricks	Review order denying motion to intervene;	0.20	96.05
11/30/22	Kyle Ewing	Conference with K. Hendricks re: feedback re: Aitheras for eDiscovery hosting received by D. Zaro; follow-up with M. Sheffield and GT litigation support re: the same	0.90	306.00
11/30/22	Kara B. Hendricks	Telephone call with D. Zaro regarding platform for document storage and related issues;	0.20	96.05
			<hr/>	
			Total Hours:	12.95
			Total Amount:	\$ 3,967.50

TIMEKEEPER SUMMARY FOR TASK CODE GW004,

CASE ADMINISTRATION

Summary of Fees (Base Rates)

<u>Timekeeper Name</u>	<u>Hours Billed</u>	<u>Base Rate</u>	<u>Total \$ Amount</u>
Kara B. Hendricks	1.90	565.00	1,073.50
Kyle Ewing	5.50	400.00	2,200.00
Zaniah A. Jordan	0.50	370.00	185.00
Akke Levin	0.40	550.00	220.00
Cynthia L. Ney	2.40	295.00	708.00
LAC GROUP LAC GROUP	2.25	220.00	495.00
Totals:	12.95		\$ 4,881.50

Summary of Fees (Discounted Rates)

<u>Timekeeper Name</u>	<u>Hours Billed</u>	<u>Average Discounted Rate</u>	<u>Total \$ Amount</u>
Kara B. Hendricks	1.90	480.26	912.50
Kyle Ewing	5.50	340.00	1,870.00
Zaniah A. Jordan	0.50	314.50	157.25
Akke Levin	0.40	467.50	187.00
Cynthia L. Ney	2.40	175.00	420.00
LAC GROUP LAC GROUP	2.25	187.00	420.75
Totals:	12.95		\$ 3,967.50

TASK CODE: GW005 CLAIMS ADMINISTRATION AND OBJECTIONS

<u>DATE</u>	<u>TIMEKEEPER</u>	<u>DESCRIPTION</u>	<u>HOURS</u>	<u>AMOUNT</u>
11/23/22	Kara B. Hendricks	Correspond with A. Deering regarding investor inquiry and response to same;	0.10	48.03
			Total Hours:	0.10
			Total Amount:	\$ 48.03

TIMEKEEPER SUMMARY FOR TASK CODE GW005,

CLAIMS ADMINISTRATION AND OBJECTIONS

Summary of Fees (Base Rates)

<u>Timekeeper Name</u>	<u>Hours Billed</u>	<u>Base Rate</u>	<u>Total \$ Amount</u>
Kara B. Hendricks	0.10	565.00	56.50
Totals:	0.10		\$ 56.50

Summary of Fees (Discounted Rates)

<u>Timekeeper Name</u>	<u>Hours Billed</u>	<u>Average Discounted Rate</u>	<u>Total \$ Amount</u>
Kara B. Hendricks	0.10	480.30	48.03
Totals:	0.10		\$ 48.03

TASK CODE: GW011 STATUS REPORTS

<u>DATE</u>	<u>TIMEKEEPER</u>	<u>DESCRIPTION</u>	<u>HOURS</u>	<u>AMOUNT</u>
11/01/22	Kyle Ewing	Draft, revise, and finalize proposed order re: status report; email communication with K. Hendricks re: the same	0.50	170.00
11/15/22	Kyle Ewing	Attend status check on latest status report before J. Silva (2.0), plan and prepare for the same and follow-up with K. Hendricks (GT), G. Winkler and A. Deering (AFS), and T. Combs/C. Fronk (SEC) (.6).	2.60	884.00
Total Hours:			3.10	
Total Amount:				\$ 1,054.00

TIMEKEEPER SUMMARY FOR TASK CODE GW011,

STATUS REPORTS

Summary of Fees (Base Rates)

<u>Timekeeper Name</u>	<u>Hours Billed</u>	<u>Base Rate</u>	<u>Total \$ Amount</u>
Kyle Ewing	3.10	400.00	1,240.00
Totals:	3.10		\$ 1,240.00

Summary of Fees (Discounted Rates)

<u>Timekeeper Name</u>	<u>Hours Billed</u>	<u>Average Discounted Rate</u>	<u>Total \$ Amount</u>
Kyle Ewing	3.10	340.00	1,054.00
Totals:	3.10		\$ 1,054.00

TIMEKEEPER ACTIVITY GRAND TOTAL SUMMARY**Summary of Fees (Base Rates)**

<u>Timekeeper</u>	<u>Hours</u>	<u>Rate</u>	<u>Amount</u>
David Edington	0.30	610.00	183.00
Kara B. Hendricks	51.00	565.00	28,815.00
Kyle Ewing	49.40	400.00	19,760.00
Zaniah A. Jordan	0.50	370.00	185.00
Christian Spaulding	41.80	375.00	15,675.00
Akke Levin	0.40	550.00	220.00
Cynthia L. Ney	20.30	295.00	5,988.50
LAC GROUP LAC GROUP	2.25	220.00	495.00
Totals:	165.95		\$ 71,321.50

Summary of Fees (Discounted Rates)

<u>Timekeeper</u>	<u>Hours</u>	<u>Rate</u>	<u>Amount</u>
David Edington	0.30	518.50	155.55
Kara B. Hendricks	51.00	481.91	24,577.50
Kyle Ewing	49.40	340.00	16,796.00
Zaniah A. Jordan	0.50	314.50	157.25
Christian Spaulding	41.80	318.75	13,323.75
Akke Levin	0.40	467.50	187.00
Cynthia L. Ney	20.30	175.00	3,552.50
LAC GROUP LAC GROUP	2.25	187.00	420.75
Totals:	165.95		\$ 59,170.30

Invoice No.: 1000224498
 Re: SEC v. Beasley (Geoff Winkler, Receiver)
 Matter No.: 209375.010100

Page 24

Description of Expenses Billed:

<u>DATE</u>	<u>DESCRIPTION</u>		<u>AMOUNT</u>
10/04/22	VENDOR: LexisNexis - ACH INVOICE#: 3094124646 DATE: 10/31/2022 Lexis Charges:Period Ocotber 10/01 - 10/31/22	\$	47.67
10/17/22	VENDOR: LexisNexis - ACH INVOICE#: 3094124646 DATE: 10/31/2022 Lexis Charges:Period Ocotber 10/01 - 10/31/22	\$	15.90
10/18/22	VENDOR: LexisNexis - ACH INVOICE#: 3094124646 DATE: 10/31/2022 Lexis Charges:Period Ocotber 10/01 - 10/31/22	\$	47.68
10/20/22	VENDOR: LexisNexis - ACH INVOICE#: 3094124646 DATE: 10/31/2022 Lexis Charges:Period Ocotber 10/01 - 10/31/22	\$	111.23
10/20/22	VENDOR: LexisNexis - ACH INVOICE#: 3094124646 DATE: 10/31/2022 Lexis Charges:Period Ocotber 10/01 - 10/31/22	\$	8.51
10/21/22	VENDOR: LexisNexis - ACH INVOICE#: 3094124646 DATE: 10/31/2022 Lexis Charges:Period Ocotber 10/01 - 10/31/22	\$	15.90
10/23/22	VENDOR: LexisNexis - ACH INVOICE#: 3094124646 DATE: 10/31/2022 Lexis Charges:Period Ocotber 10/01 - 10/31/22	\$	47.68
10/24/22	VENDOR: LexisNexis - ACH INVOICE#: 3094124646 DATE: 10/31/2022 Lexis Charges:Period Ocotber 10/01 - 10/31/22	\$	47.68
10/26/22	VENDOR: LexisNexis - ACH INVOICE#: 3094124646 DATE: 10/31/2022 Lexis Charges:Period Ocotber 10/01 - 10/31/22	\$	47.68
		Total Expenses:	\$ 389.93



Invoice No. : 1000224438
 File No. : 209375.010100
 Bill Date : February 14, 2023

Geoff Winkler
 715 NW Hoyt Street, Suite 4364
 Portland, OR 97208

Attn: Geoff Winkler

INVOICE

Re: SEC v. Beasley (Geoff Winkler, Receiver)

THIS INVOICE REPLACES INVOICE 1000197471

Total Fees: \$ 63,414.70

Expenses:

Filing Fees	40.00
Local Travel	4.00
Other Charges	1,010.00
Transcript Charges	187.00

Total Expenses: \$ 1,241.00

Current Invoice: \$ 64,655.70

Previous Balance (see attached statement): \$ 160,880.68

Total Amount Due: \$ 225,536.38

KBH:LC
 Tax ID: 13-3613083



Invoice No. : 1000224438
File No. : 209375.010100

REMITTANCE ADVICE

PLEASE RETURN WITH YOUR PAYMENT
Note: Payment is Due 30 Days from Date of Invoice

CLIENT NAME: WINKLER, GEOFF
FILE NUMBER: 209375.010100
INVOICE NUMBER: 1000224438*
BILLING PROFESSIONAL: Kara B. Hendricks

Current Invoice:	\$	64,655.70
Previous Balance:	\$	160,880.68
Total Amount Due:	\$	225,536.38

FOR YOUR CONVENIENCE, WIRE TRANSFER FUNDS TO:

For Wire Instructions:

Bank: WELLS FARGO BANK
ABA #: 121000248

For ACH Instructions:

Bank: WELLS FARGO BANK
ABA#: 063107513

CREDIT TO: GREENBERG TRAUIG DEPOSITORY ACCOUNT
ACCOUNT #: 2000014648663

PLEASE

REFERENCE: CLIENT NAME: WINKLER, GEOFF
FILE NUMBER: 209375.010100
INVOICE NUMBER: 1000224438*
BILLING
PROFESSIONAL: Kara B. Hendricks

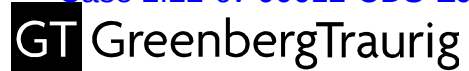
IF YOU WISH TO PAY BY CHECK PLEASE REMIT TO THE ADDRESS BELOW:

**Greenberg Traurig
PO Box 936769
ATLANTA GA 31193-6769**

Wire fees may be assessed by your bank.

*** If paying more than one invoice, please reference all invoice numbers in wiring instructions.**

KBH:LC
Tax ID: 13-3613083



Invoice No. : 1000224438
File No. : 209375.010100

Please contact acct-cashreceipts@gtlaw.com for any payment related questions.

KBH:LC

Tax ID: 13-3613083



Invoice No. : 1000224438
 File No. : 209375.010100

Account Statement

<u>Date</u>	<u>Invoice #</u>	<u>Fees Due</u>	<u>Expenses Due</u>	<u>Other Due</u>	<u>Total Due</u>
07/19/22	1000035547	16,627.52	0.00	0.00	16,627.52
10/03/22	1000096060	12,029.69	0.00	0.00	12,029.69
11/09/22	1000142381	16,674.86	0.00	0.00	16,674.86
11/09/22	1000142507	8,666.16	0.00	0.00	8,666.16
12/09/22	1000166978	61,032.86	389.93	0.00	61,422.79
02/10/23	1000219800	44,878.73	580.93	0.00	45,459.66
	Totals:	\$ 159,909.82	\$ 970.86	\$ 0.00	\$ 160,880.68

KBH:LC

Tax ID: 13-3613083

Description of Professional Services Rendered:

TASK CODE: GW001 ASSET ANALYSIS AND RECOVERY

<u>DATE</u>	<u>TIMEKEEPER</u>	<u>DESCRIPTION</u>	<u>HOURS</u>	<u>AMOUNT</u>
12/01/22	Kyle Ewing	Follow up with K. Hendricks re: Libertas Funding judgment against Beasley and M&P Holdings	0.20	68.00
12/01/22	Kyle Ewing	Follow-up with K. Hendricks re: feedback re: Aitheras for eDiscovery hosting received from M. Sheffield and GT litigation support re: the same	0.30	102.00
12/01/22	Kyle Ewing	Continue researching law in support of motion to employ conflicts counsel for ancillary proceedings and review draft engagement and other agreements with counsel and provide edits to the same (1.1); email communication with C. Spaulding re: drafting the motion (.2).	1.30	442.00
12/01/22	Kyle Ewing	Make final edits to letter to attorney general's office requesting opinion on application of transfer tax framework to transfers to real property by a court-appointed receiver to include county recorder as additional addressee (.9); conference with K. Hendricks re: calls with DA and AG (.2).	1.20	408.00
12/01/22	Kara B. Hendricks	Review and revise declaration in support of Dean memorandum of costs and work with C. Spaulding to finalize same;	0.70	336.17
12/01/22	Kara B. Hendricks	Follow-up with T. Combs and C. Fronk regarding stipulation to sale Canvas Edge;	0.10	48.02
12/01/22	Kara B. Hendricks	Request K. Ewing assistance to finalize stipulation for Canvas Edge and pending motions;	0.20	96.05
12/01/22	Kara B. Hendricks	Call with G. Winkler and D. Zaro to discuss attorney proposal, joint prosecution agreement, Beasley concerns and tax transfer updates;	0.80	384.20
12/01/22	Kara B. Hendricks	Initial review of appeal of magistrate order and request C. Spaulding's assistance with response to same;	0.20	96.05
12/01/22	Kara B. Hendricks	Review minute order regarding hearing on Grisgby motion to compel and forward to W. Schuller;	0.10	48.02
12/01/22	Kara B. Hendricks	Telephone call with D. Pope regarding transfer tax issues and AG concerns (.4); Discuss procedural issues with K. Ewing (.3); Follow-up with C. Jorgensen regarding draft letter and next steps (.2);	0.90	432.22
12/01/22	Kara B. Hendricks	Review correspondence regarding Jongeward frozen account and follow-up	0.20	96.05

12/01/22	Kara B. Hendricks	with C. Spaulding regarding same; Follow-up with G. Ogata regarding Beasley cooperation with property sale;	0.10	48.02
12/01/22	Cynthia L. Ney	Further redaction to invoices in support of fee request regarding K.Dean motions (.1); communications with team regarding same (.1).	0.10	17.50
12/01/22	Cynthia L. Ney	Research and compilation of documentation regarding suit involving Libertas Funding and Beasley (.6); communications with K.Ewing regarding same (.1).	0.70	122.50
12/01/22	Cynthia L. Ney	Analysis and redaction of attorney invoices for filing in support of memorandum of fee request regarding Kamille Dean attorney fee motion (1.3); communications with K.Hendricks regarding same (.1).	1.40	245.00
12/01/22	Christian Spaulding	Evaluate relevant documents and communications and draft letter to Mountain America Credit Union regarding account belonging to J. Jongeward to be unfrozen.	1.10	350.68
12/01/22	Christian Spaulding	Evaluate pre-bills for charges related to Memorandum of Fees pertaining to Kamille Dean. Determine fees, revise Memorandum and declarations accordingly.	2.70	860.62
12/01/22	Christian Spaulding	Confer with team regarding Kamille Dean objection to Magistrate Order and response to the same.	0.30	95.62
12/02/22	Kyle Ewing	Conference with C. Spaulding re: drafting motion to employ contingency conflicts counsel; provide documents in connection with the same	0.40	136.00
12/02/22	Kyle Ewing	Review and revise draft letter to Mountain America re: frozen Jongeward accounts (.3); email communication with G. Winkler re: the same (.3).	0.60	204.00
12/02/22	Kyle Ewing	Telephonic communication with J. Jongeward re: frozen bank account at Mountain West	0.10	34.00
12/02/22	Kyle Ewing	Email communication with D. Hollingsworth re: order on stipulation to turnover assets seized by FBI from defendant Humphries (.4); email communication with G. Winkler and K. Hendricks re: the same; review order in connection with the same (.2).	0.60	204.00
12/02/22	Kyle Ewing	Telephone call to receivership court re: status of stipulation and order to release assets seized by FBI from defendant Humphries (.2); review related pleadings and minute order in connection with the same (.1); follow-up email communication with chambers re: the same (.1).	0.40	136.00
12/02/22	Kyle Ewing	Further review and revision to two stipulations/orders re: waiving CapSource's	1.30	442.00

		interest in the Entrust ancillary proceeding to address final comments/edits of K. Hendricks		
12/02/22	Kyle Ewing	Email communication with J. Kellogg and J. Levine re: status of various agreements re: retention as conflict counsel	0.10	34.00
12/02/22	Kyle Ewing	Email communication with G. Winkler and J. Hall re: scheduling time to meet with Holo eDiscovery re: tech services while Geoff is in Las Vegas	0.20	68.00
12/02/22	Kara B. Hendricks	Attention to information regarding Seybert franchise and forward to G. Winkler;	0.10	48.02
12/02/22	Kara B. Hendricks	Work with K. Ewing to advance pending matters including pending stipulation, class counsel follow-up and issues with Beasley properties and Jongeward document request;	0.30	144.07
12/02/22	Kara B. Hendricks	Telephone call with D. Hollingsworth regarding asset turnover (.2); Follow-up with K. Ewing and request his assistance following up with court regarding order to facilitate turnover (.1);	0.30	144.07
12/02/22	Christian Spaulding	Confer with K. Ewing and revise draft of letter to Mountain America Credit Union regarding Jongeward account accordingly.	1.00	318.75
12/02/22	Christian Spaulding	Confer with K. Ewing and begin draft of Motion to Employ Conflicts Counsel.	3.20	1,020.00
12/03/22	Kara B. Hendricks	Respond to A. Deering emails regarding Canvas edge stipulation;	0.10	48.02
12/05/22	Kyle Ewing	Begin reviewing K. Dean's appeal/motion for reconsideration of magistrate judge order and relevant materials provided by J. DelCastillo (AM)	0.40	136.00
12/05/22	Kyle Ewing	Email communication with A. Deering re: setting up meetings with Holo and Disco in connection with choosing eDiscovery vendor; follow-up with GT's litigation support team about vendor/platform options	0.30	102.00
12/05/22	Kara B. Hendricks	Attention to emails from A. Deering regarding transfer of Beasley properties (.1); Request D. Edington's assistance with review of quit claim deeds associated with Beasley properties (.1):	0.20	96.05
12/05/22	Kara B. Hendricks	Correspond with J. del Castillo regarding Dean response and status of communication with G. Ogata regarding Beasley properties;	0.30	144.07
12/05/22	Kara B. Hendricks	Respond to email from J. Kellogg and follow-up regarding draft documents;	0.10	48.02
12/05/22	Cynthia L. Ney	Analysis of asset spreadsheet and electronic organization of same.	0.30	52.50
12/05/22	Christian Spaulding	Continue draft of Motion to employ Conflicts Counsel and confer with K. Ewing regarding the same.	4.00	1,275.00
12/06/22	Kyle Ewing	Conference with K. Hendricks re: various outstanding issues case including the	0.30	102.00

		Beasleys' failures to stipulate to sale of real property and options for addressing the same; ongoing consideration of various eDiscovery vendors and pros/cons of different platforms; Mountain America Credit Union requests for information, and other items		
12/06/22	Kyle Ewing	Email communication with A. Deering re: Mountain America's request for copy of TRO (re: Jongeward's attempts to open new bank account); review TRO and email communication with C. Spaulding re: the same; conference with K. Hendricks	0.40	136.00
12/06/22	Kyle Ewing	Review and make edits to draft motion to employ conflicts counsel drafted by C. Spaulding; provide comments to C. Spaulding for further edits	3.00	1,020.00
12/06/22	Kara B. Hendricks	Correspond with D. Edington regarding draft deeds and forward comments to A. Deering and J. delCastillo;	0.20	96.05
12/06/22	Kara B. Hendricks	Attention to emails regarding Mountain America/Jongeward request and follow-up with K. Ewing regarding sealed documents;	0.20	96.05
12/06/22	Kara B. Hendricks	Review emails from title company and follow-up regarding spousal quitclaim request by emailing A. Grigsby;	0.20	96.05
12/06/22	Kara B. Hendricks	Attention to email regarding payments on Ruffian Road Property and telephone call to M. Bohn regarding same;	0.20	96.05
12/06/22	Kara B. Hendricks	Respond to email from L. Maningo regarding Seybert sell of KW property and funds to receiver (.3); Follow-up with G. Winkler regarding same (.1);	0.40	192.10
12/06/22	Kara B. Hendricks	Follow-up with K. Ewing regarding pending issues including property transfer and tax inquiry;	0.20	96.05
12/06/22	Kara B. Hendricks	Attention to email from J. Humphries with bank statements;	0.10	48.02
12/06/22	Kara B. Hendricks	Respond to email from L. Maningo regarding bank records;	0.10	48.02
12/06/22	Kara B. Hendricks	Attention to email from A. Deering regarding communication with title company regarding quitclaim;	0.20	96.05
12/06/22	Kara B. Hendricks	Attention to K. Dean motion and declarations and outline issues for response to same;	0.60	288.15
12/06/22	Kara B. Hendricks	Attention to email with L. Jeffrey records;	0.10	48.02
12/06/22	Cynthia L. Ney	Analysis and organization of materials provided by defendants Humphries , Jeffery and Seybert (.6); communications with K.Hendricks regarding same (.1).	0.70	122.50
12/06/22	Christian Spaulding	Confer with K. Ewing regarding request from client for copy of Temporary Restraining Order and preliminary injunction.	0.30	95.62
12/06/22	Christian Spaulding	Continue review of class action complaint	5.50	1,753.12

		and draft of Motion to Employ conflicts counsel.		
12/07/22	Kyle Ewing	Multiple email communications with US Attorney's office (D. Hollingsworth and C. Farago) re: ACH transfer of Humphries funds seized by FBI; complete ACH request form in connection with the same	0.30	102.00
12/07/22	Kyle Ewing	Review D. Zaro's redline comments to engagement letter and related agreements re: conflicts counsel.	0.50	170.00
12/07/22	Kyle Ewing	Complete ACH request form re: ACH transfer of Humphries funds seized by FBI, as provided by US Attorneys' office; email communication with G. Winkler and K. Hendricks re: the same	0.50	170.00
12/07/22	Kyle Ewing	Conference with C. Spaulding re: edits/comments to motion to employ conflicts counsel.	0.20	68.00
12/07/22	Kara B. Hendricks	Follow-up with C. Spaulding regarding response to Dean motion and provide outline for same;	0.20	96.05
12/07/22	Kara B. Hendricks	Attention to order on Canvas Edge property and forward to A. Deering;	0.10	48.02
12/07/22	Kara B. Hendricks	Respond to email from J. Kellogg;	0.10	48.02
12/07/22	Kara B. Hendricks	Attention to emails regarding elsior motion to enable sale of Beasley property and provide documentation of meet and confer efforts;	0.20	96.05
12/07/22	Kara B. Hendricks	Review and revise proposed engagement agreement and related documents for further analysis of ancillary matters;	1.10	528.27
12/07/22	Kara B. Hendricks	Attention to email from A. Grigsby regarding Via Regina sale;	0.10	48.02
12/07/22	Cynthia L. Ney	Analysis of file and compilation of materials for K.Ewing's review.	0.30	52.50
12/07/22	Christian Spaulding	Evaluate ancillary matter and revise draft motion to employ conflicts counsel accordingly in conjunction with comments from K. Ewing.	3.90	1,243.12
12/08/22	Kyle Ewing	Telephonic conference with G. Winkler, J. Hall, and K. Hendricks re: various outstanding items, including pros and cons of selecting different eDiscovery vendors/platforms, motion to employ conflicts counsel, and status of efforts to transfer title of Beasley properties to receivership	0.40	136.00
12/08/22	Kyle Ewing	Participate in conference call with prospective outside counsel re: terms of engagement and other items	0.50	170.00
12/08/22	Kyle Ewing	Review power of attorney executed by M. Beasley in favor of P. Beasley in connection with evaluating her status as an agent of M. Beasley	0.20	68.00
12/08/22	Kyle Ewing	Review further edits of C. Spaulding to motion to employ conflicts counsel for ancillary litigation; email communication	0.80	272.00

12/08/22	Kyle Ewing	re: draft motion with D. Zaro (AM) Participate in weekly call with AFS (G. Winkler, J. Hall, and others), AM (D. Zaro and J. Delcastillo) and GT (K. Hendricks)	0.80	272.00
12/08/22	Kyle Ewing	re: receiver's progress in forensic accounting, pursuit of ancillary litigation, sale of real estate, sale of vehicles, and pending motions		
12/08/22	Kyle Ewing	Draft list of questions/queries re: eDiscovery offerings and services offered by Aitheras	1.40	476.00
12/08/22	Kara B. Hendricks	Telephone call with G. Winkler and proposed counsel for ancillary proceedings and transition matters going forward to Allen Matkins;	0.40	192.10
12/08/22	Kara B. Hendricks	Correspond with A. Deering regarding sale of Canvas Edge and additional request from title company;	0.30	144.07
12/08/22	Kara B. Hendricks	Telephone call with G. Winkler, J. Hall and K. Ewing to discuss proposed vendors to handle e-discovery and related issues and proposals obtained;	0.30	144.07
12/08/22	Kara B. Hendricks	Revise and provide comments regarding documents provided by D. Zaro relating to ancillary proceedings;	1.30	624.32
12/08/22	Kara B. Hendricks	Participate in team call (G. Winkler, A. Deering, AFS team representatives, J. del Castillo, D. Zaro, K. Ewing)to discuss pending case issues including forensic accounting, assert recovery and sales, defendant cooperation, motions work and related matters;	0.90	432.22
12/08/22	Kara B. Hendricks	Correspond with A. Deering regarding Canvas Edge stipulation and order;	0.10	48.02
12/08/22	Kara B. Hendricks	Follow-up with E. Smith regarding notice of default removal on Tahoe property;	0.10	48.02
12/08/22	Kara B. Hendricks	Attention to emails regarding Paula Beasley signature on quit claim and related issues;	0.10	48.02
12/08/22	Kara B. Hendricks	Revise correspondence to proposed vendor regarding e-discovery services and circulate to G. Winkler and Allen Matkins team for input;	0.50	240.12
12/08/22	Cynthia L. Ney	Review notes of weekly meeting and recent filings and email communications.	0.30	52.50
12/08/22	Christian Spaulding	Confer with K. Ewing regarding potential conflicts counsel and motion to employ the same.	0.20	63.75
12/08/22	Christian Spaulding	Evaluate correspondence and draft retainer agreements with potential conflicts counsel for use in motion to employ.	2.90	924.37
12/09/22	Kyle Ewing	Begin planning and preparing for next Fridays hearing on multiple motions before Judges Youchah and Silva (.5); conference with K. Hendricks re: the same (.2); begin reviewing briefing associated with motion to clarify asset freeze (Madsen attorney	1.90	646.00

		fees) in preparation for arguing the same (1.2)		
12/09/22	Kara B. Hendricks	Prepare amended stipulation for sale of Canvas Edge and correspond with A. Deering, T. Combs and C. Fronk regarding same;	0.60	288.15
12/09/22	Kara B. Hendricks	Correspond with C. Fronk and T. Combs regarding meeting prior to upcoming hearings;	0.20	96.05
12/09/22	Kara B. Hendricks	Request K. Ewing's assistance with outlining/identifying matters that will be heard by court and discuss preparation for hearing regarding same;	0.40	192.10
12/09/22	Kara B. Hendricks	Review common interest agreement and correspond with D. Zaro;	0.20	96.05
12/09/22	Christian Spaulding	Review grounds for appeal/objection to magistrate order and begin draft of response to objection filed by Kamille Dean.	6.30	2,008.12
12/12/22	Kara B. Hendricks	Attention to motion for reconsideration of motion to intervene and follow-up with J. delCastillo regarding preparation of response brief;	0.20	96.05
12/12/22	Kara B. Hendricks	Attention to email from A. Deering regarding Jager request for pay back information;	0.20	96.05
12/12/22	Kara B. Hendricks	Follow-up with C. Spaulding regarding response to Dean motion for reconsideration;	0.10	48.02
12/12/22	Kara B. Hendricks	Correspond with A. Deering regarding Tanner signature and sale of property via amended stipulation;	0.10	48.02
12/12/22	Kara B. Hendricks	Attention to email from J. delCastillo regarding motion to assist G. Winkler with sale of Beasley property and provide emails demonstrating efforts to obtain signatures needed and request C. Ney's assistance to obtain information on how to contact Beasley in prison (.4); Review C. Ney findings regarding same and forward to team (.1);	0.50	240.12
12/12/22	Kara B. Hendricks	Respond to email from Ogata law regarding Beasley cooperation and update G. Winkler;	0.20	96.05
12/12/22	Cynthia L. Ney	Research where M.Beasley is detained and phone call with Nevada Southern Detention Center regarding visitation of M.Beasley (.7); compilation of materials regarding procedures for visitation and forwarding of same to G.Winkler (.4)	1.10	192.50
12/12/22	Christian Spaulding	Evaluate Kamille Dean objection to Magistrate Order and review authority cited therein in preparation of draft response.	4.80	1,530.00
12/12/22	Christian Spaulding	Continue draft response to Kamille Dean Objection to Magistrate Order.	3.20	1,020.00
12/13/22	Kyle Ewing	Begin reviewing and outlining motion to	2.70	918.00

		clarify asset freeze/allow R. Madsen attorneys to retain funds in preparation for arguing the motion at Friday's hearing; review court's prior orders on attorney retainers in conjunction with the same		
12/13/22	Kyle Ewing	Email communication with J. delCastillo re: legal standard for appeal/motion to reconsider magistrate judge's order granting fee award against attorney K. Dean	0.30	102.00
12/13/22	Kara B. Hendricks	Attention to email from Ogata Law Group and forward to J. del Castillo and G. Winkler;	0.10	48.02
12/13/22	Kara B. Hendricks	Follow-up with SEC regarding amended stipulation to sale Canvas Edge;	0.10	48.02
12/13/22	Kara B. Hendricks	Correspond with C. Spaulding regarding response to Dean motion to reconsider and request inclusion of local rule in standard to be addressed (.3); Review and revise response;	3.10	1,489.12
12/13/22	Kara B. Hendricks	Attention to emails regarding sale process (.1); attention to draft Motion for turnover or appointment of elisor and provide comments and proposed revisions to J. delCastillo (.1).	0.20	96.05
12/13/22	Christian Spaulding	Confer and coordinate with team regarding applicable standard of review with respect to an objection to an order of a magistrate judge, such as that filed by Kamille Dean.	0.60	191.25
12/13/22	Christian Spaulding	Continue draft of Response to Kamille Dean objection to order of magistrate judge.	10.90	3,474.37
12/14/22	Kyle Ewing	Conference with K. Hendricks re: Madsen motion to clarify asset freeze and other pending motions in preparation for two hearings set for 12/16	0.20	68.00
12/14/22	Kyle Ewing	Virtual conference with Aitheras team (L. Milstein), AFS team (G. Winkler and J. Hall), D. Zaro (AM), and K. Hendricks (GT) re: possibility of retaining Aitheras as principal technical provider including document storage, eDiscovery, and forensic accounting support and Aitheras's responses to the receiver's request for information re: Aitheras's eDiscovery support; follow up with K. Hendricks and D. Zaro re: the same	1.60	544.00
12/14/22	Kyle Ewing	Review and provide edits to response to K. Dean's appeal/objection to magistrate judge order compelling turnover of funds and awarding fees; conference with K. Hendricks re: the same	0.60	204.00
12/14/22	Kara B. Hendricks	Attention to email from T. Combs and work with E. Escobar-Gaddi to facilitate filing of amended stipulation for sale of Canvas Edge;	0.30	144.07
12/14/22	Kara B. Hendricks	Call with L. Milstein regarding Aitheras	1.10	528.27

		services and cost options relating to data and litigation support;		
12/14/22	Kara B. Hendricks	Correspond via email with J. del Castillo regarding Beasley elisor motion and options for court to facilitate meeting with Beasley;	0.10	48.02
12/14/22	Kara B. Hendricks	Attention to draft response to interpleader reconsideration request and provide comments to J. delCastillo;	0.30	144.07
12/14/22	Kara B. Hendricks	Review order denying Humphries motion to dismiss;	0.10	48.02
12/14/22	Kara B. Hendricks	Confer with D. Zaro and K. Ewing regarding vendor selection and litigation support services including Aitheras proposal;	0.50	240.12
12/14/22	Kara B. Hendricks	Telephone call with D. Hollingsworth regarding Judd turnover issues, Humphries ACH transfer, Beasley turnover and follow-up with G. Winkler regarding same;	0.50	240.12
12/14/22	Kara B. Hendricks	Voicemail message from E. Doberstein regarding Beasley Tahoe property and return call;	0.20	96.05
12/14/22	Kara B. Hendricks	Attention to email from G. Winkler regarding response to Dean motion and follow-up with C. Spaulding (.2); Discuss local rule implications with K. Ewing and request he further update response (.1); Final review of response and finalize same (.3);	0.60	288.15
12/14/22	Cynthia L. Ney	Analysis and organization of materials received from defendants.	0.70	122.50
12/14/22	Christian Spaulding	Proofread and finalize draft of Response to Kamille Dean Objection to Order on Motion to Compel.	1.50	478.12
12/15/22	Kyle Ewing	Finish planning and preparing for tomorrow's hearings, including finishing outline and reviewing briefing for argument opposing R. Madsen's motion to clarify freeze order/retain attorney funds; review case law cited in briefing on Madsen motion in conjunction with the same; locate and review correct May 14 Madsen engagement letter since copy attached to Madsen's motion appears to be tampered with	5.50	1,870.00
12/15/22	Kyle Ewing	Participate in weekly receiver team call with AFS team, Allen Matkins team, and K. Hendricks to discuss status of various receiver legal projects, including pending motions and hearings tomorrow, continued efforts to sell real property and obtain defendants' cooperation with regard to the same, contracting with any eDiscovery and other technical services vendor, and other items	0.60	204.00
12/15/22	Kara B. Hendricks	Attention to Motion for turnover and related pleadings and Madsen motion for	1.30	624.32

12/15/22	Kara B. Hendricks	clarification and related filings in preparation for upcoming status hearing; Attention to SEC response to Dean motion for reconsideration;	0.20	96.05
12/15/22	Kara B. Hendricks	Final review of response to Dean motion and request E. Escobar-Gaddi's assistance with filing;	0.20	96.05
12/15/22	Kara B. Hendricks	Attention to Canvas Edge order and forward to A. Deering;	0.10	48.02
12/15/22	Kara B. Hendricks	Confer with C. Ney on Secretary of State options for CJ Holdings;	0.20	96.05
12/15/22	Kara B. Hendricks	Participate in meeting to discuss case status, asset recover, forensic accounting and upcoming hearings (G. Winkler, A. Deering, J. Hall, K. Ewing, D. Zaro, J. del Castillo participating);	0.50	240.12
12/15/22	Kara B. Hendricks	Prepare for hearing on Grigsby/Beasley Motion to compel, follow-up with G. Winkler on document request pieces and review other filings relating to hearing matters;	3.70	1,776.92
12/15/22	Kara B. Hendricks	Telephone call to E. Doberson regarding Beasley Tahoe property;	0.10	48.02
12/15/22	Kara B. Hendricks	Attention to email from J. del Castillo regarding exhibits for elisor motion, forward information requested and follow-up telephone call;	0.40	192.10
12/15/22	Zaniah A. Jordan	Email correspondence regarding steps to get JC Investments back good standing with the Nevada Secretary of State	0.30	94.35
12/15/22	Cynthia L. Ney	Review Secretary of State website regarding CJ Investments (.3); communications with tea and A.Deering regarding change in registered agent, annual lists and time frames for submission (.4).	0.70	122.50
12/15/22	Cynthia L. Ney	Analysis of motions and court orders allowing withdrawal of counsel regarding alternative service on defendants (.6); communications with K.Hendricks and K.Ewing regarding same (.2).	0.80	140.00
12/15/22	Christian Spaulding	Evaluate SEC Response to Kamille Dean Appeal and Objection to Magistrate Judge Order on Motion to Compel.	0.30	95.62
12/16/22	Kyle Ewing	Participate in status hearing and provide court information regarding Madsen motion to clarify asset freeze/allow payment of attorneys' fees, assistance need from US Marshals as to Beasley, fee application and status report and debrief with Receiver and counsel for SEC	2.20	748.00
12/16/22	Kyle Ewing	Participate in status hearing and provide court information regarding Madsen motion to clarify asset freeze/allow payment of attorneys' fees, assistance need from US Marshals as to Beasley, fee application and status report and debrief	0.80	272.00

12/16/22	Kyle Ewing	with Receiver and counsel for SEC Participate in hearing on motion to compel as to Grigsby and P. Beasley; follow-up with K. Hendricks, the Receiver, and counsel for the SEC	2.10	714.00
12/16/22	Kyle Ewing	Meeting with G. Winkler, K. Ewing, C. Fronk and M. Welsh regarding status of case and upcoming hearing	1.50	510.00
12/16/22	Kyle Ewing	Review outline and annotated case law in final preparation for arguing Madsen's motion to clarify asset freeze/allow payment of attorneys' fees	0.50	170.00
12/16/22	Kara B. Hendricks	Attention to emails regarding updating SOS information for CJ Investments and confer with C. Ney regarding same;	0.20	96.05
12/16/22	Kara B. Hendricks	Correspond with C. Spaulding relating to local rules and impact on response filed by Dean to memorandum of costs;	0.20	96.05
12/16/22	Kara B. Hendricks	Meeting with G. Winkler, C. Fronk and M. Welsh regarding status of case and upcoming hearing;	1.40	672.35
12/16/22	Kara B. Hendricks	Outline issues for upcoming hearing;	0.80	384.20
12/16/22	Kara B. Hendricks	Attention to objection to magistrate consideration and opposition to memorandum of fees from K. Dean and correspond with G. Winkler regarding same;	0.40	192.10
12/16/22	Kara B. Hendricks	Confer with G. Winkler, K. Ewing and SEC counsel after Motion to compel and prior to status hearing regarding pending issues and next steps;	0.80	384.20
12/16/22	Kara B. Hendricks	Participate in hearing on motion to compel as to Grigsby and P. Beasley;	2.10	1,008.52
12/16/22	Zaniah A. Jordan	Review annual list and amendment to articles required to put JC Investments back in good standing	0.50	157.25
12/16/22	Cynthia L. Ney	Analysis of documentation for upcoming hearing (.4); communications with K.Hendricks regarding same and hearing (.2).	0.60	105.00
12/16/22	Christian Spaulding	Confer with team regarding options related to impermissible filing by Kamille Dean in response to Memorandum of Fees and the Response to Appeal/Objection.	0.20	63.75
12/16/22	Christian Spaulding	Evaluate Kamille Dean response to Memorandum of Fees related to Motion to Compel.	0.40	127.50
12/17/22	Kyle Ewing	Email communication with K. Hendricks and C. Spaulding re: K. Dean's most recent frivolous filings and the Receiver's procedural options for addressing the same with the Court	0.20	68.00
12/17/22	Christian Spaulding	Evaluate local rules regarding permitted response/reply briefs with respect to Kamille Dean's response to Receiver's Memorandum of Fees.	0.30	95.62
12/19/22	Kyle Ewing	Review K. Dean's latest inappropriate	2.40	816.00

		filings and research legal issues and case law relied on by Dean in conjunction with the same		
12/19/22	Kyle Ewing	Draft outline of response and potential options for addressing K. Dean's latest inappropriate filings and potential motion for leave to file reply or to strike the same; begin drafting motion in connection with the same	3.50	1,190.00
12/19/22	Kara B. Hendricks	Propose revisions to investor email;	0.20	96.05
12/19/22	Cynthia L. Ney	Review Secretary of State website for procedure to file LLC documentation (.2); prepare Registered Agent change form for CJ Investment, CJ Investment Annual List and CJ Investment LLC Amendment (1.1); communications and forward registered agent form to Cogency Global to act as new RA for CJ Investments (.3); forwarding of forms to G.Winkler and A.Deering for review (.1); communications with K.Hendricks regarding CJ Investment (.2).	1.90	332.50
12/20/22	Kyle Ewing	Finish drafting response to K. Dean's latest inappropriate filings and motion for leave to file reply or to strike the same; conference with K. Hendricks re: receiver's procedural options with respect to the same in light of Court's order precluding reply in support of Receiver's memorandum of fees and costs; review and revise the same to address comments of K. Hendricks	3.90	1,326.00
12/20/22	Kyle Ewing	Conference with K. Hendricks to evaluate receiver's options re: EcoBattery in light of today's partnership meeting decision to pursue an inventory loan and use to wind down operations of the business	0.20	68.00
12/20/22	Kyle Ewing	Continue researching law in connection with reviewing K. Dean's most recent filings and objections and drafting Receiver's response to the same	1.50	510.00
12/20/22	Kara B. Hendricks	Follow-up with K. Ewing regarding request to strike K. Dean filing and get update regarding applicable case law and standards;	0.30	144.07
12/20/22	Kara B. Hendricks	Attention to email and documents provided by L. Maningo regarding sale of Keller Williams brokerage and follow-up with G. Winkler regarding same;	0.30	144.07
12/20/22	Kara B. Hendricks	Telephone call with G. Winkler regarding Eco Battery meeting and review correspondence with L. Abbott regarding same;	0.30	144.07
12/20/22	Kara B. Hendricks	Respond to email from C. Fronk based on D. Clucky requests;	0.10	48.02
12/20/22	Cynthia L. Ney	Communications with A.Deering regarding CJ Investments forms for submission to Nevada Secretary of State.	0.10	17.50

12/21/22	Kyle Ewing	Attention to email from UFMS re: vendor request form for Humphries funds; email communication with K. Hendricks and G. Winkler re: the same	0.10	34.00
12/21/22	Kyle Ewing	Conference with K. Hendricks re: motion to strike or for leave to file sur-reply w/r/t K. Dean's latest improper filings	0.20	68.00
12/21/22	Kara B. Hendricks	Discuss motion to strike with K. Ewing and review and revise draft of same and circulate to G. Winkler for review; Work with E. Escobar-Gaddi to facilitate filing;	0.60	288.15
12/21/22	Kara B. Hendricks	Follow-up with G. Winkler regarding Seybert request; Email L. Maningo regarding Seybert request and sale of business;	0.30	144.07
12/21/22	Kara B. Hendricks	Review order on turnover motion and discuss with G. Winkler (.2); Respond to email from H. Skillin regarding turnover order and Receiver's discussions with Judd (.1);	0.30	144.07
12/22/22	Kara B. Hendricks	Attention to correspondence from M. Cook regarding Murphy production and follow-up to confirm documents obtained and request those missing from file;	0.30	144.07
12/22/22	Kara B. Hendricks	Telephone call to S. Mirkovich regarding ancillary matters;	0.10	48.02
12/22/22	Kara B. Hendricks	Review email from C. Fronk regarding case conference and follow-up with G. Winkler;	0.10	48.02
12/22/22	Kara B. Hendricks	Call with C. Fronk and M. Welsh regarding requests from D. Clukey (.3); Correspond with D. Clukey regarding additional documents requested (.2);	0.50	240.12
12/22/22	Kara B. Hendricks	Review new filings from K. Dean in support of her objection to Magistrate Order;	0.20	96.05
12/22/22	Kara B. Hendricks	Participate in call with G. Winkler, A. Deering, J. Hall, D. Zaro, M. Pham and others regarding status of forensic account, asset recovery efforts, and anticipated filings;	0.80	384.20
12/22/22	Kara B. Hendricks	Telephone call to E. Doberson regarding South Lake Tahoe property issues;	0.10	48.02
12/22/22	Kara B. Hendricks	Email D. O'Toole and C. Perkins wire instructions;	0.20	96.05
12/22/22	Cynthia L. Ney	Finalize CJ Investments annual list, amendment and registered agent change to Nevada Secretary of State for filing.	0.60	105.00
12/22/22	Cynthia L. Ney	Review of recent pleadings, email communications and team meeting notes.	0.40	70.00
12/23/22	Kara B. Hendricks	Correspond with K. Ewing regarding 26.f notice and Receiver role;	0.10	48.02
12/27/22	Kyle Ewing	Review and analyze latest improper filings by K. Dean, including replies in support of her appeal of the magistrate judge's ruling in connection with determining what response, if any, is required from the	1.10	374.00

		receiver and whether a further motion to strike the procedurally improper filings is necessary; conference with K. Hendricks re: the same; research law in connection with the same		
12/27/22	Kara B. Hendricks	Follow-up with L. Maningo regarding Seybert issues and review in greater detail the draft stipulation and documents provided and follow-up with G. Winkler regarding concerns (1.1); Telephone call with L. Maningo and G. Winkler regarding same (.3);	1.40	672.35
12/27/22	Kara B. Hendricks	Review documents regarding AZ lis pendens and correspond with E. Edington and B. Bigler regarding filing same;	0.20	96.05
12/27/22	Kara B. Hendricks	Telephone call from W. Scheuller regarding hearing and G-Wagon;	0.20	96.05
12/28/22	Kyle Ewing	Review minutes and notes from last week's weekly call with receivership team in preparation for this week's meeting	0.20	68.00
12/28/22	Kyle Ewing	Review and analyze cease/desist letter from Allen Matkins to Eco Battery and its principals re: recent loan transaction and related correspondence from G. Winkler; research law and evaluate procedural options for halting "plan" of reorganization planned by Eco Battery management	0.70	238.00
12/28/22	Kyle Ewing	Review email re: turnover of attorney funds from C. Perkins (counsel for R. Madsen); conference with K. Hendricks re: the same	0.10	34.00
12/28/22	Adrianna Gorton	Work on issues regarding Lis Penden and recording of same.	1.00	382.50
12/28/22	Kara B. Hendricks	Review new information from L. Maningo regarding sale of Seybert franchises, revise stipulation and follow-up with G. Winkler regarding next steps;	0.80	384.20
12/28/22	Kara B. Hendricks	Attention to emails and correspondence regarding EcoBattery concerns and follow-up with Utah office for additional background regarding applicable statutes;	0.70	336.17
12/28/22	Kara B. Hendricks	Attention to email from D. O'Toole and follow-up with G. Winkler regarding payment instructions for transfer of Madsen funds;	0.30	144.07
12/28/22	Kara B. Hendricks	Respond to email from H. Skillin regarding Judd contact information and turnover order;	0.10	48.02
12/28/22	Kara B. Hendricks	Telephone call from W. Schuller regarding hearing on motion to compel and court direction;	0.10	48.02
12/28/22	Kara B. Hendricks	Discussion with B. Bigler regarding lis pendens and filing notice of same in Arizona;	0.20	96.05
12/28/22	Amy L. Hershberger	Assist with revising Notice of Lis Pendens for Pecos Road and S. 163 Street properties to be recorded in Maricopa County.	2.20	579.70
12/28/22	Cynthia L. Ney	Review file and compilation of materials	0.30	52.50

		for K.Hendricks' review.		
12/29/22	Kyle Ewing	Review and analyze order granting fee award against K. Dean and discuss with K. Hendricks in regard to Dean's repeated filings and objections to J. Youchah's orders since the order authorizing fees	0.10	34.00
12/29/22	Kyle Ewing	Telephonic conference with K. Hendricks, M. Rasich (GT), and M. Thompson (GT) re: procedural requirements and strategy with regard to potential action in Utah w/r/t EcoBattery's purported plan of reorganization; research law re: jurisdiction and receiverships under Utah law in preparation for the same (.7); follow up with K. Hendricks (1.6)	2.30	782.00
12/29/22	Kyle Ewing	Participate in weekly call with AFS (G. Winkler, J. McGraw, and M. Chavez) and AM (J. Del Castillo and M. Pham) re: receivership status, including discussion of recent corporate improprieties by EcoBattery LLC and developments re: sale of D. Seybert real estate brokerages	0.60	204.00
12/29/22	Kara B. Hendricks	Review email and draft stipulation regarding turnover of Judd property including asset list and follow-up with G. Winkler regarding same;	0.10	48.02
12/29/22	Kara B. Hendricks	Review transcript from Beasley/Grigsby order to show cause hearing and dates and information required to be produced and forward to Receiver;	0.40	192.10
12/29/22	Kara B. Hendricks	Respond to email from L. Maningo with proposed revisions to stipulation and provide SEC additional information regarding transaction for consideration;	0.20	96.05
12/29/22	Kara B. Hendricks	Participate in team call (with G. Winkler, J. McCraw, K. Ewing, J. del Castillo, M. Pham) to discuss pending issues including asset recovery measures including Eco Battery, Beasley properties, Humphries property and case needs;	0.70	336.17
12/29/22	Kara B. Hendricks	Confer with M. Rasich and M. Thomson regarding Utah procedural issues and further research options relating to Eco Battery claims;	0.90	432.22
12/29/22	Kara B. Hendricks	Review email and documents from B. Bigler and AZ office regarding lis pendens and forward to G. Winkler for approval and signature;	0.20	96.05
12/29/22	Kara B. Hendricks	Follow-up with Utah litigators regarding assistance with Eco Battery matters;	0.10	48.02
12/29/22	Kara B. Hendricks	Review J. McCraw analysis regarding Seybert proposal and follow-up via email with additional information;	0.20	96.05
12/30/22	Kara B. Hendricks	Review email from N. Oberheiden regarding Judd stipulation;	0.10	48.02
12/30/22	Kara B. Hendricks	Review email and updated stipulation from K. Valenti and approve Seybert stipulation	0.20	96.05

12/30/22	Kara B. Hendricks	for filing; Attention to email from S. Gagin regarding Murphy documents and correspond with C. Ney regarding initial review;	0.30	144.07
12/30/22	Cynthia L. Ney	Analysis and organization of materials provided by defendant Murphy (.5); review file and communications with counsel for Mark Murphy regarding missing documents (.2); compile and forward Murphy documents to A.Deering (.2)	0.90	157.50
12/30/22	Cynthia L. Ney	Analysis and organization of supplemental documentation from defendant Humphries.	0.30	52.50
			<hr/>	
			Total Hours:	171.80
			Total Amount:	\$ 61,803.74

TIMEKEEPER SUMMARY FOR TASK CODE GW001,

ASSET ANALYSIS AND RECOVERY

Summary of Fees (Base Rates)

<u>Timekeeper Name</u>	<u>Hours Billed</u>	<u>Base Rate</u>	<u>Total \$ Amount</u>
Kara B. Hendricks	47.70	565.00	26,950.50
Kyle Ewing	54.30	400.00	21,720.00
Adrianna Gorton	1.00	450.00	450.00
Zaniah A. Jordan	0.80	370.00	296.00
Christian Spaulding	53.60	375.00	20,100.00
Amy L. Hershberger	2.20	310.00	682.00
Cynthia L. Ney	12.20	295.00	3,599.00
Totals:			\$ 73,797.50

Summary of Fees (Discounted Rates)

<u>Timekeeper Name</u>	<u>Hours Billed</u>	<u>Average Discounted Rate</u>	<u>Total \$ Amount</u>
Kara B. Hendricks	47.70	480.25	22,907.94
Kyle Ewing	54.30	340.00	18,462.00
Adrianna Gorton	1.00	382.50	382.50
Zaniah A. Jordan	0.80	314.50	251.60
Christian Spaulding	53.60	318.75	17,085.00
Amy L. Hershberger	2.20	263.50	579.70
Cynthia L. Ney	12.20	175.00	2,135.00
Totals:			\$ 61,803.74

TASK CODE: GW002 ASSET DISPOSITION

<u>DATE</u>	<u>TIMEKEEPER</u>	<u>DESCRIPTION</u>	<u>HOURS</u>	<u>AMOUNT</u>
12/02/22	Kyle Ewing	Finalize stipulation and order re: sale of canvas edge property in preparation for filing the same; email communication with A. Deering re: the same	0.50	170.00
12/02/22	Kyle Ewing	Telephonic conference with K. Hendricks re: J. Jongeward's request re: frozen Mountain America accounts; and stipulation to release assets seized by FBI from Humphries; follow-up with C. Spaulding re: letter to Mountain America	0.30	102.00
12/06/22	David Edington	Review draft quitclaim deeds and provide comments to same; attention to emails regarding same.	0.30	155.55
Total Hours:			1.10	
Total Amount:				\$ 427.55

TIMEKEEPER SUMMARY FOR TASK CODE GW002,

ASSET DISPOSITION

Summary of Fees (Base Rates)

<u>Timekeeper Name</u>	<u>Hours Billed</u>	<u>Base Rate</u>	<u>Total \$ Amount</u>
David Edington	0.30	675.00	202.50
Kyle Ewing	0.80	400.00	320.00
Totals:	1.10		\$ 522.50

Summary of Fees (Discounted Rates)

<u>Timekeeper Name</u>	<u>Hours Billed</u>	<u>Average Discounted Rate</u>	<u>Total \$ Amount</u>
David Edington	0.30	518.50	155.55
Kyle Ewing	0.80	340.00	272.00
Totals:	1.10		\$ 427.55

TASK CODE: GW004 CASE ADMINISTRATION

<u>DATE</u>	<u>TIMEKEEPER</u>	<u>DESCRIPTION</u>	<u>HOURS</u>	<u>AMOUNT</u>
12/14/22	Kara B. Hendricks	Attention to email from A. Deering regarding CJ Investments and review information with Secretary of State (.2); Update A. Deering and provide proposed next steps (.1);	0.30	144.07
12/14/22	Kara B. Hendricks	Request C. Ney's assistance to prepare updates for CJ Investments with the Secretary of State;	0.10	48.02
12/19/22	Kara B. Hendricks	Review completed forms to update information with secretary of state for CJ Investments and correspond with C. Ney regarding finalizing same;	0.10	48.02
12/23/22	Cynthia L. Ney	Review recent pleadings and communications from opposing counsel.	0.30	52.50
12/28/22	Beth Bigler	Review issues re recording lis pendens in Arizona; review and revise lis pendens.	2.20	794.75
12/29/22	Kara B. Hendricks	Follow-up with A. Deering and J. McCray after receiving voicemail from M. Bohn regarding information need to facilitate sale of Ruffian property;	0.20	96.05
Total Hours:			3.20	
Total Amount:				\$ 1,183.41

TIMEKEEPER SUMMARY FOR TASK CODE GW004,

CASE ADMINISTRATION

Summary of Fees (Base Rates)

<u>Timekeeper Name</u>	<u>Hours Billed</u>	<u>Base Rate</u>	<u>Total \$ Amount</u>
Kara B. Hendricks	0.70	565.00	395.50
Beth Bigler	2.20	425.00	935.00
Cynthia L. Ney	0.30	295.00	88.50
Totals:	3.20		\$ 1,419.00

Summary of Fees (Discounted Rates)

<u>Timekeeper Name</u>	<u>Hours Billed</u>	<u>Average Discounted Rate</u>	<u>Total \$ Amount</u>
Kara B. Hendricks	0.70	480.23	336.16
Beth Bigler	2.20	361.25	794.75
Cynthia L. Ney	0.30	175.00	52.50
Totals:	3.20		\$ 1,183.41

TIMEKEEPER ACTIVITY GRAND TOTAL SUMMARY**Summary of Fees (Base Rates)**

<u>Timekeeper</u>	<u>Hours</u>	<u>Rate</u>	<u>Amount</u>
David Edington	0.30	675.00	202.50
Kara B. Hendricks	48.40	565.00	27,346.00
Beth Bigler	2.20	425.00	935.00
Kyle Ewing	55.10	400.00	22,040.00
Adrianna Gorton	1.00	450.00	450.00
Zaniah A. Jordan	0.80	370.00	296.00
Christian Spaulding	53.60	375.00	20,100.00
Amy L. Hershberger	2.20	310.00	682.00
Cynthia L. Ney	12.50	295.00	3,687.50
Totals:	176.10		\$ 75,739.00

Summary of Fees (Discounted Rates)

<u>Timekeeper</u>	<u>Hours</u>	<u>Rate</u>	<u>Amount</u>
David Edington	0.30	518.50	155.55
Kara B. Hendricks	48.40	480.25	23,244.10
Beth Bigler	2.20	361.25	794.75
Kyle Ewing	55.10	340.00	18,734.00
Adrianna Gorton	1.00	382.50	382.50
Zaniah A. Jordan	0.80	314.50	251.60
Christian Spaulding	53.60	318.75	17,085.00
Amy L. Hershberger	2.20	263.50	579.70
Cynthia L. Ney	12.50	175.00	2,187.50
Totals:	176.10		\$ 63,414.70

Invoice No.: 1000224438
 Re: SEC v. Beasley (Geoff Winkler, Receiver)
 Matter No.: 209375.010100

Page 21

Description of Expenses Billed:

<u>DATE</u>	<u>DESCRIPTION</u>	<u>AMOUNT</u>
10/13/22	VENDOR: Hendricks, Kara B. INVOICE#: 1105 DATE: 12/21/2022	\$ 2.00
11/15/22	VENDOR: Hendricks, Kara B. INVOICE#: 1105 DATE: 12/21/2022	\$ 2.00
11/17/22	VENDOR: Kinsey, Teri INVOICE#: 5552271412132039 DATE: 12/13/2022 Other; 11/17/22 - Various Annual List fees for Nevada Secretary of State.; Merchant: NV SECRETARY OF STATE	\$ 1,010.00
12/16/22	VENDOR: McNett, Samantha N. INVOICE#: 311 DATE: 12/16/2022 TRANSCRIPT AND TRANSCRIPTION FEE FOR DECEMBER 16, 2022 MOTION HEARING (44 PAGES)	\$ 187.00
12/22/22	VENDOR: Nationwide Legal, LLC - 4527 INVOICE#: 00000051817 DATE: 12/31/2022 RUSH FILING (3 HRS) - UNITED STATES DISTRICT COURT DISTRICT OF NEVADA, 333 LAS VEGAS BLVD., SOUTH, LAS VEGAS on 12/22/22 Req'd by/for Escobar	\$ 40.00
Total Expenses:		<hr/> \$ 1,241.00