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12 *Attorneys for Receiver Geoff Winkler*

13
14 **UNITED STATES DISTRICT COURT**
15 **DISTRICT OF NEVADA**
16

17 SECURITIES AND EXCHANGE
18 COMMISSION,

19 Plaintiff,

20 vs.

21 MATTHEW WADE BEASLEY, *et al.*,

22 Defendants,

23 THE JUDD IRREVOCABLE TRUST, *et al.*,

24 Relief Defendants.
25

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

Judge Hon. Cristina D. Silva

**FIFTH QUARTERLY APPLICATION FOR
PAYMENT OF FEES AND
REIMBURSEMENT OF EXPENSES OF
RECEIVER'S COUNSEL: (1) ALLEN
MATKINS LECK GAMBLE MALLORY &
NATSIS, LLP; AND (2) SEMENZA
KIRCHER RICKARD**

[Declaration of Joshua A. del Castillo; and
Declaration of Jarrod L. Rickard submitted
concurrently herewith]

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1 **TO THIS HONORABLE COURT AND ALL INTERESTED PARTIES:**

2 **PLEASE TAKE NOTICE THAT** Allen Matkins Leck Gamble Mallory & Natsis LLP
3 ("Allen Matkins"), general receivership counsel for Geoff Winkler (the "Receiver"), the Court-
4 appointed receiver for J&J Consulting Services, Inc., an Alaska corporation; J&J Consulting
5 Services, Inc., a Nevada corporation; J and J Purchasing LLC; The Judd Irrevocable Trust; and BJ
6 Holdings LLC, and over the Wells Fargo Interest on Lawyers' Trust Account ending in 5598 and
7 held in the name of Beasley Law Group PC, along with the personal assets of certain individual
8 defendants in the above-entitled action, and Semenza Kircher Rickard ("SKR"), the Receiver's
9 local counsel, hereby submit this Fifth Quarterly Application for Payment of Fees and
10 Reimbursement of Expenses (the "Application").

11 **PLEASE FURTHER TAKE NOTICE** that, prior to the submission of this Application,
12 Allen Matkins and SKR submitted their invoices for the period in issue here to the plaintiff
13 Securities and Exchange Commission (the "SEC"), in accordance with their customary practice
14 and this Court's orders. SEC staff has reviewed the invoices and provided comments and has
15 further expressed that the SEC does not oppose the interim approval and payment of fees as
16 requested herein.

17 **I. INTRODUCTION.**

18 Allen Matkins and SKR serve as Court-approved counsel to the Receiver, who was
19 appointed pursuant to this Court's June 5, 2022 *Order Appointing Receiver* (the "Appointment
20 Order") [ECF No. 88], and whose appointment was reaffirmed via the Court's July 28, 2022 *Order*
21 *Amending Receivership Order (Dkt. No. 88)* (the "Amended Appointment Order") [ECF No. 207].
22 Pursuant to the terms of the Appointment Order and Amended Appointment Order, the Receiver is
23 vested with authority and control over J&J Consulting Services, Inc., an Alaska corporation; J&J
24 Consulting Services, Inc., a Nevada corporation; J and J Purchasing LLC; The Judd Irrevocable
25 Trust; and BJ Holdings LLC, and over the Wells Fargo Interest on Lawyers' Trust Account ending
26 in 5598 and held in the name of Beasley Law Group PC, along with the personal assets of certain
27 individual defendants in the above-entitled action (all, collectively, the "Receivership
28 Defendants") and authorized, subject to the approval of this Court, to "engage and employ persons

1 in his discretion ... to assist him in carrying out his duties and responsibilities [as Receiver],
 2 including, but not limited to ... attorneys" and other professionals. (See Appointment Order at
 3 ¶ 7(F).)

4 This Application represents the fifth quarterly application for payment of fees and
 5 reimbursement of expenses submitted by Allen Matkins and SKR in accordance with Paragraph
 6 62 of the Appointment Order, and covers fees and expenses incurred between April 1, 2023 and
 7 June 30, 2023 (the "Application Period").

8 By way of this Application, Allen Matkins and SKR request the Court's approval of 100%
 9 of their fees and expenses incurred during the Application Period and further requests the interim
 10 payment of 80% of such fees and 100% of such expenses, to be paid from the funds of the
 11 receivership estate established in the above-entitled action (the "Receivership Estate" or "Estate").
 12 Specifically, the amounts of the Applicants' fees and expenses sought to be approved and paid
 13 under this Fee Application are as follows:

<u>Applicant</u>	<u>Total Fees</u>	<u>Interim Payment Requested (Fees)</u>	<u>Expenses</u>	<u>Interim Payment Requested (Expenses)</u>
Allen Matkins	\$141,461.00 ¹	\$113,168.80	\$1,273.97	\$1,273.97
SKR	\$6,869.00	\$5,495.20	\$1,232.00	\$1,232.00
<u>TOTAL:</u>	\$148,330.00	\$118,664.00	\$2,505.97	\$2,505.97

21 In accordance with the commitment made to the Receiver by Allen Matkins and SKR in
 22 connection with their engagement as counsel and local counsel in this matter, the fees identified
 23 above were billed at rates significantly discounted from Allen Matkins' and SKR's standard hourly
 24 rates, in certain cases reflecting discounts in excess of 40% from standard rates. In addition,
 25 consistent with the billing guidelines of the plaintiff SEC, and Allen Matkins' and SKR's

27 _____
 28 ¹ Allen Matkins has applied a line item discount of \$7,500.00 to the fees it incurred during the Application Period in order to align its fees with the blended rate target establishing in the instant receivership.

1 commitment in this federal receivership, Allen Matkins and SKR request interim payment of only
2 80% of their respective fees, as noted above; the remaining, unpaid 20% "holdback" of Allen
3 Matkins' and SKR's approved fees will be subject to final review and payment at the conclusion of
4 this receivership.

5 **II. GENERAL SUMMARY.**

6 During the Application Period, and with assistance from Allen Matkins and SKR, the
7 Receiver made substantial progress on critical elements of Estate administration, including in
8 securing the turnover of additional funds in accordance with his authority under the Appointment
9 Order and Amended Appointment Order, personal, and real property, and subsequently
10 monetizing certain of those assets for the benefit of the receivership estate, along with attending to
11 his filing obligations arising in connection with, among other things, responding to an intervention
12 effort by two receivership entity investors, asset monetization, required turnovers of funds and
13 other assets, and regularly reporting on his progress to this Court.

14 As reflected in prior applications for payment of fees and reimbursement of expenses in
15 this matter, the Receiver and his professionals have been required to expend significant time and
16 effort to preserve the *status quo*, pursue the recovery of receivership assets, and undertake efforts
17 to obtain financial documents and other information that will likely prove critical to the
18 administration of the Receiver's administration of the Estate, his evaluation of prospective creditor
19 claims, and any clawback or disgorgement litigation that the Receiver ultimately determines, in his
20 reasonable business judgment, is required to recover assets for the benefit of the Estate and its
21 creditors. While a full accounting of the Receiver's efforts and success is impracticable here, as
22 reflected in the Receiver's contemporaneously submitted interim reporting, his asset recovery
23 efforts have been remarkably successful. Indeed, as of the date of this Application, the Receiver's
24 efforts have resulted in the recovery of assets – including cash, financial instruments, vehicles, a
25 private aircraft, cryptocurrency, real property, and other assets – with an estimated aggregate value
26 of more than \$74 million.

27 In addition, in coordination with Allen Matkins and SKR, the Receiver has continued to
28 attend to critical case administration deadlines and other matters of importance to the receivership,

1 and continued his efforts to obtain and review essential documents relating to the business and
2 financial activities of the Receivership Defendants.

3 Given the amount and significance of the work completed by Allen Matkins and SKR, and
4 the significant benefit of their efforts to the Estate, Allen Matkins and SKR respectfully submit –
5 as further detailed in the accompanying motion to approve the Application (filed under separate
6 cover in omnibus form) that the fees and expenses incurred during the Application Period are
7 reasonable and appropriate and should be approved and paid, on an interim basis, in the amounts
8 indicated above. Again, as an accommodation to the Estate, and consistent with the SEC's billing
9 guidelines and the ordinary practice in federal receiverships, Allen Matkins and SKR request that
10 the Court approve 100% of the fees and expenses incurred during the Application Period but
11 authorize payment, on an interim basis, of only 80% of such fees and 100% of such expenses, at
12 this time.

13 **III. ALLEN MATKINS' FEES AND EXPENSES.**

14 **A. The Receiver's Retention Of Allen Matkins.**

15 Allen Matkins was retained by the Receiver in June 2022. The Receiver selected Allen
16 Matkins as one of two firms serving as general receivership counsel due to the firm's decades-long
17 experience and expertise in federal equity receivership matters, as well as in creditors' rights,
18 litigation, and personal and real property disposition matters. Allen Matkins has served as counsel
19 to federal equity receivers in dozens of cases, has represented a variety of constituents in hundreds
20 of bankruptcy matters, and has significant substantive experience in related areas, such as
21 securities, corporate, and real estate.

22 **B. The Receiver's Retention Of SKR.**

23 SKR was initially retained by the Receiver in June 2022. The Receiver selected SKR as
24 his local Nevada counsel due to SKR's extraordinary reputation in the Las Vegas legal community,
25 its prior working relationship with the Receiver's other general receivership counsel, Greenberg
26 Traurig, LLP, and its familiarity with local policies and procedures essential to the administration
27 of the Estate.
28

1 **C. Services Rendered By Allen Matkins During The Application Period.**

2 During the Application Period, Allen Matkins extensively assisted the Receiver in the
3 performance of his duties under the Appointment Order, primarily by attending to critical
4 Receivership Estate administration, asset recovery and disposition, and pending and anticipated
5 litigation matters.

6 In all, on account of its services rendered to the Receiver during the Application Period,
7 Allen Matkins billed 280.5 hours, and incurred \$149,094.50 in fees and \$1,273.97 in expenses,
8 across the following categories²:

<u>Category</u>	<u>Hours</u>	<u>Fees</u>	<u>Expenses</u>
General Receivership	37.6	\$20,093.50	\$1,273.97
Asset Recovery & Management	99.9	\$52,605.50	\$0.00
Investigation & Reporting	101.6	\$55,242.50	\$0.00
Sale, Disposition & Transfer of Assets	22.5	\$12,262.50	\$0.00
Third Party Claims & Recoveries	18.6	\$8,757.00	\$0.00
<u>TOTAL:</u>	280.2	\$148,961.00	\$1,273.97
<u>\$7,500 FEE DISCOUNT³ APPLIED:</u>		\$141,461.00	\$1,273.97

18 Provided below are narrative summaries of the work performed under each of the
19 categories, and attached hereto as **Exhibit 1** are Allen Matkins' *pro forma* billing statements,
20 containing the billing entries detailing the tasks performed by the firm's attorneys and paralegals
21 during the Application Period.

24 ² A very limited number of Allen Matkins' entries reflect discussions between counsel. These
25 entries include language referencing "advice to counsel", "confer with counsel", or similar
26 discussions in connection with a particular issue. In accordance with applicable billing
27 guidelines, such discussions have been kept to a minimum. Where they occur, Allen Matkins
28 respectfully submits they are necessary and appropriate; on occasion, Allen Matkins attorneys
will seek out the expertise of other personnel in the firm to avoid costly research or otherwise
to expedite required work, in order to minimize the expense to the receivership.

³ Again, Allen Matkins has applied a one-time, line item discount of \$7,500 to the fees incurred
during the Application Period in order to better align its fees with previously proposed blended
rates.

1 As it has since the inception of this matter, Allen Matkins endeavored to staff each task
 2 efficiently, using a core team of attorneys, with specialized assistance as necessary. As the Court
 3 and interested parties may recall, Allen Matkins also agreed to a significant discount from its
 4 ordinary billing rates for this matter, as well as not to charge the Estate for any travel time
 5 associated with services provided to the Receiver. Accordingly, the fees identified below were
 6 billed at rates reflecting discounts of as much as 40% or more for Allen Matkins timekeepers,
 7 thereby resulting in a substantial savings for the Estate.⁴ In addition, and as noted above and
 8 further detailed in the Declarations submitted in support of this Application, Allen Matkins' fee
 9 and expense records were transmitted to the SEC for review on a monthly basis, and have drawn
 10 no objection.

11 **1. General Receivership.**

12 During the Application period, Allen Matkins attorneys billed 37.6 hours to the "General
 13 Receivership" work category, and incurred \$1,273.97 in expenses, largely in connection with
 14 attending to critical case and estate administration matters, conferring regarding case filings,
 15 coordinating with the Receiver and co-counsel, and attending Court hearings. Allen Matkins
 16 personnel billed the following time and fees during the Application Period:

<u>Timekeeper</u>	<u>Position</u>	<u>Hourly Rate</u>	<u>Hours</u>	<u>Fees</u>
Joshua del Castillo	Partner	\$545	33.9	\$18,475.50
Matthew Pham	Associate	\$445	3.4	\$1,513.00
Simona Peng	Paralegal	\$350	0.3	\$105.00
<u>TOTAL:</u>			37.6	\$20,093.50

22 Work performed in this category related to critical case and Estate administration matters,
 23 including, among other things: (1) attending to outstanding case administration tasks,
 24 (2) developing strategic plans for the administration of the Estate with the Receiver and co-

26 _____
 27 ⁴ Indeed, had Allen Matkins billed at its standard rates, its fees for the Application Period would
 28 be tens of thousands of dollars more than the amount requested in the Application. In
 addition, and over and above the savings to the Estate realized from rate discounts, Allen
 Matkins has written off thousands of dollars in time entries, in accordance with its
 commitment to minimizing the Estate's expenses.

1 counsel; (3) attending to issues arising in connection with a pending Ninth Circuit appeal filed by
 2 prospective intervenors in the above-entitled action, and preparing a response strategy; and
 3 (4) preparing for and attending meetings of counsel and Court hearings. As a result of these
 4 efforts, the Receiver has streamlined his case and Estate administration strategy, timely responded
 5 (in opposition) to numerous pleadings that directly implicated the viability of the Court's
 6 receivership, and satisfied his ongoing obligations to the Court and all interested parties.
 7 Expenses incurred in connection with this category are primarily attributable to: (1) fees for
 8 electronic document hosting and management services; and (2) filing fees and fees associated
 9 with service of process.

10 **2. Asset Recovery & Management.**

11 During the Application period, Allen Matkins attorneys billed 100.2 hours to the "Asset
 12 Recovery & Management" work category, and incurred \$0.0 in expenses. Allen Matkins
 13 personnel billed the following time and fees during the Application Period:

14 <u>Timekeeper</u>	<u>Position</u>	<u>Hourly Rate</u>	<u>Hours</u>	<u>Fees</u>
15 David Zaro	Partner	\$545	12.6	\$6,867.00
16 Joshua del Castillo	Partner	\$545	68.9	\$37,550.50
17 Matthew Pham	Associate	\$445	8.9	\$3,960.50
18 James Robichaud	Associate	\$445	9.8	\$4,361.00
19 <u>TOTAL:</u>			100.2	\$52,739.00

20
 21 Work performed in this category related to the Receiver's efforts to recover from third
 22 parties assets subject to the turnover provisions of the Appointment Order and Amended
 23 Appointment Order, which require all third parties in possession of assets of the Receivership
 24 Defendants to turn such assets over to the Receiver. During the Application Period, and among
 25 other things, Allen Matkins' attorneys: (1) engaged in an extensive analysis of accountings
 26 associated with apparent retention of receivership assets by various third parties, and
 27 communications with those parties' respective representatives regarding turnover and discovery
 28 matters; (2) prepared, issued, and followed up regarding written turnover demands; (3) prepared

1 stipulations for the turnover of receivership assets held by third parties; (4) communicated with
 2 third parties, including financial institutions, to ensure ongoing compliance with turnover
 3 demands; (5) investigated whether attorneys for Receivership Entities in pre-receivership period
 4 were in possession of recoverable receivership assets; (6) investigated and analyzed the status and
 5 value of prospective receivership assets, critically including real property and equity assets;
 6 (7) reviewed materials and prepared subpoenas in connection with the Receiver's asset recovery
 7 efforts; and (8) communicated with financial institutions to ensure that actual account turnovers
 8 matched the agreed-upon turnovers. As noted above, these efforts have contributed to the
 9 Receiver's recovery of more than approximately \$74 million in cash, vehicles, a private aircraft,
 10 cryptocurrency, real property, and other assets for the benefit of the Estate and its creditors.

11 **3. Investigation and Reporting.**

12 During the Application period, Allen Matkins attorneys billed 101.6 hours to the
 13 "Investigation & Reporting" work category, and incurred \$0.0 in expenses. Allen Matkins
 14 personnel billed the following time and fees during the Application Period:

15 <u>Timekeeper</u>	<u>Position</u>	<u>Hourly Rate</u>	<u>Hours</u>	<u>Fees</u>
16 David Zaro	Partner	\$545	27.5	\$14,987.50
17 Edward Fates	Partner	\$545	0.4	\$218.00
18 Joshua del Castillo	Partner	\$545	72.5	\$39,512.50
19 Matthew Pham	Associate	\$445	1.1	\$489.50
20 Simona Peng	Paralegal	\$350	0.1	\$35.00
21 <u>TOTAL:</u>			101.6	\$55,242.50

22
 23 Work performed in this category related largely to the Receiver's ongoing document
 24 recovery and review efforts, as well as to the Receiver's reporting obligations to the Court. During
 25 the Application Period, and among other things, Allen Matkins attorneys: (1) assisted with the
 26 satisfaction of the Receiver's reporting obligations to the Court; (2) engaged in ongoing and
 27 extensive discovery efforts in coordination with financial institutions believed to be in possession
 28 of relevant receivership and Receivership Defendant records, including the negotiation and

1 preparation of proposed protective orders, where appropriate; (3) identified and investigated the
 2 nature of debt instruments issued by a third party and held by certain Receivership Defendants;
 3 (4) prepared a draft motion for protective order for the Receiver in anticipation of voluminous
 4 third party document requests; (5) prepared formal subpoenas and document requests; and
 5 (6) coordinated with the Receiver to manage and input into the proper document management
 6 system documents produced directly to Allen Matkins. As of the date of this Application, Allen
 7 Matkins has issued dozens of document requests and subpoenas, covering hundreds of accounts,
 8 and is in the process of coordinating the production of records from multiple financial institutions.

9 **4. Sale, Disposition & Transfer of Assets.**

10 During the Application period, Allen Matkins attorneys billed 22.5 hours to the "Sale,
 11 Disposition & Transfer of Assets" work category, and incurred \$0.0 in expenses.

12 Allen Matkins personnel billed the following time and fees during the Application Period:

<u>Timekeeper</u>	<u>Position</u>	<u>Hourly Rate</u>	<u>Hours</u>	<u>Fees</u>
David Zaro	Partner	\$545	1.0	\$545.00
Joshua del Castillo	Partner	\$545	21.5	\$11,717.50
<u>TOTAL:</u>			22.5	\$12,262.50

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 18 Work performed in this category related to the Receiver's ongoing and successful asset
 19 disposition efforts, including with respect to some of the Estate's most valuable personal and real
 20 property assets. Among other things, during the Application Period, Allen Matkins attorneys:
 21 (1) reviewed title and related documents in anticipation the sale of various real properties;
 22 (2) conferred with various banks and title companies in the course of consummating real property
 23 sales; (3) engaged in legal analysis relating to issues arising in connection with frozen real
 24 property assets in which the Estate held indirect beneficial ownership; and (4) drafted stipulations
 25 and other documents in connection with the sale of real property. As a result of these efforts, the
 26 Receiver has recovered tens of millions of dollars in net sales proceeds of personal and real
 27 property assets, with potentially millions of dollars in additional sales expected over the course of
 28 the receivership.

1 **5. Third Party Claims & Recoveries.**

2 During the Application period, Allen Matkins attorneys billed 18.6 hours to the "Third
3 Party Claims & Recoveries" work category, and incurred \$0.0 in expenses.

4 Allen Matkins personnel billed the following time and fees during the Application Period:

<u>Timekeeper</u>	<u>Position</u>	<u>Hourly Rate</u>	<u>Hours</u>	<u>Fees</u>
David Zaro	Partner	\$545	0.6	\$327.00
Michael Farrell	Partner	\$545	0.4	\$218.00
Joshua del Castillo	Partner	\$545	3.8	\$2,071.00
James Robichaud	Associate	\$445.00	13.8	\$6,141.00
<u>TOTAL:</u>			18.6	\$8,757.00

11
12 During the Application Period, Allen Matkins worked extensively with the Receiver in
13 connection with examining and evaluating third party claims or actionable conduct appearing to
14 implicate the interests of the Estate.

15 In addition, Allen Matkins: (1) engaged in an extensive review of documents produced by
16 third parties in possession of receivership assets in connection with the Receiver's ongoing
17 financial analysis; (2) reviewed the actions of third parties in possession of receivership
18 investment assets and evaluated the viability of prospective claims arising therefrom; and (3) and
19 prepared and transmitted claims-specific document and associated demands at the Receiver's
20 request.

21 **D. Services Rendered By SKR During The Application Period.**

22 During the Application Period, SKR provided critical local counsel support to the
23 Receiver, including in connection with the preparation, finalization, and filing of key documents in
24 the above-entitled action. SKR expended a substantial portion of its time during the Application
25 Period managing and coordinating the production response of a financial institution with which
26 the Receivership Entities banked extensively. In addition, SKR attorneys and staff: (1) worked
27 with Allen Matkins to facilitate the Receiver's discovery efforts relating to other financial
28 institutions, including by corresponding with such financial institutions concerning the scope of

1 documents responsive to the Receiver's subpoenas and potential protective orders; (2) coordinated
 2 with Allen Matkins in drafting a prospective complaint to be filed against a third party apparently
 3 implicated in the Ponzi scheme alleged in the above-entitled action; (3) prepared and reviewed
 4 stipulations in connection with the sale of real property for the benefit of the Estate; and
 5 (4) otherwise assisted the Receiver and Allen Matkins, as necessary, with the preparation and
 6 filing of pleadings in the above-entitled action. A complete description of the services rendered by
 7 SKR can be found in the invoices collectively appended hereto as **Exhibit 2**.

8 By way of summary, SKR attorneys and staff billed the following amounts each month
 9 during the Application Period:

<u>Month</u>	<u>Total Fees Billed</u>
April 2023	\$2,941.50
May 2023	\$2,412.00
June 2023	\$1,515.50
<u>TOTAL:</u>	<u>\$6,869.00</u>

16 **IV. THE FEES AND EXPENSES INCURRED ARE REASONABLE AND SHOULD BE**
 17 **ALLOWED.**

18 Allen Matkins and SKR respectfully submit that the fees and expenses incurred during the
 19 Application Period were fair, reasonable, necessary, and significantly benefited the Estate.
 20 Specifically, and as reflected in **Exhibits 1** and **2**, Allen Matkins and SKR have endeavored to
 21 staff this matter appropriately, billing their time at substantially discounted rates, and steadfastly
 22 attempted to avoid duplication of effort by, among other things, coordinating with the Receiver
 23 and co-counsel regarding a formal division of labor and participating in regular discussions
 24 regarding work in progress to minimize the likelihood of duplication. In addition, and as reflected
 25 in the Receiver's prior submissions to this Court, Allen Matkins and SKR are providing an
 26 extremely high quality of work in a matter involving dozens of relevant parties and hundreds of
 27 millions of dollars in assets. Their efforts are bearing fruit: the Receiver has recovered more than
 28 \$74 million in personal and real property assets. He has consistently succeeded in securing

1 necessary and appropriate relief from the Court, the turnover of cash and other assets, and the sales
2 of personal and real property. Put simply, in a highly complex receivership, and while the
3 Receiver continues to develop a comprehensive knowledge and understanding the underlying
4 facts, critical players, and assets, the Receiver – with the help of Allen Matkins and SKR – is
5 recovering millions of dollars in cash, obtaining the turnover of millions of dollars in personal and
6 real property, and has already secured Court approval of and successfully undertaken procedures
7 aimed at monetizing those assets in a manner intended to maximize the recovery for the benefit of
8 the Estate and creditors, including investors. The fees and expenses incurred by Allen Matkins
9 and SKR during the Application Period are minimal when compared to these results⁵, and Allen
10 Matkins and SKR respectfully request that the Court approve 100% of their fees and expenses,
11 and also authorize the payment of those fees and expenses on a percentage, interim basis, as
12 requested herein.

13 Allen Matkins' and SKR's invoices have been submitted to the SEC for review prior to the
14 filing of this Application, and as of the date of the filing of this Application, the SEC has not
15 indicated that it has substantive questions regarding, or will oppose, the Application.

16 **V. CONCLUSION.**

17 For the foregoing reasons, Allen Matkins and SKR respectfully requests that the Court
18 enter an order:

- 19 1. Granting this Application in its entirety;
- 20 2. Approving Allen Matkins' fees and expenses incurred during the Application
21 Period, in the respective amounts of \$141,461.00 and \$1,273.97;
- 22 3. Authorizing the Receiver to pay Allen Matkins, on an interim basis, 80% of its
23 approved fees incurred during the Application Period, in the amount of \$113,168.80, and 100% of
24 its approved expenses incurred during the Application Period, in the amount of \$1,273.97, from
25 the funds of the Receivership Estate;

26
27
28 ⁵ Indeed, the less than \$150,000.00 requested in this application reflects approximately one fifth
of one percent of the approximately \$74 million in assets already recovered by the Receiver.

- 1 4. Approving SKR's fees and expenses incurred during the Application Period, in the
2 respective amounts of \$6,869.00 and \$1,232.00; and
- 3 5. Authorizing the Receiver to pay SKR, on an interim basis, 80% of its approved fees
4 incurred during the Application Period, in the amount of \$5,495.20, and 100% of its approved
5 expenses incurred during the Application Period, in the amount of \$1,232.00; and
- 6 6. Providing such other and further relief as the Court deems just and proper.
- 7

8 Dated: August 15, 2023

SEMENZA KIRCHER RICKARD

9 */s/ Jarrod L. Rickard*

10 Jarrod L. Rickard, Bar No. 10203
11 Katie L. Cannata, Bar No. 14848
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15 Joshua A. del Castillo (admitted *pro hac vice*)
16 Matthew D. Pham (admitted *pro hac vice*)
865 South Figueroa Street, Suite 2800
Los Angeles, California 90017-2543

17 *Attorneys for Receiver Geoff Winkler*

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CERTIFICATE OF SERVICE

I am employed by the law firm of Semenza Kircher Rickard in Clark County. I am over the age of 18 and not a party to this action. The business address is 10161 Park Run Drive, Suite 150, Las Vegas, Nevada 89145.

On the 15th day of August, 2023, I served the document(s), described as:

FIFTH QUARTERLY APPLICATION FOR PAYMENT OF FEES AND REIMBURSEMENT OF EXPENSES OF RECEIVER'S COUNSEL: (1) ALLEN MATKINS LECK GAMBLE MALLORY & NATSIS, LLP; AND (2) SEMENZA KIRCHER RICKARD

[Declaration of Joshua A. del Castillo; and Declaration of Jarrod L. Rickard submitted concurrently herewith]

by serving the original a true copy of the above and foregoing via:

a. **CM/ECF System** to the following registered e-mail addresses:

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11 miriam@palazzolawfirm.com, office@palazzolawfirm.com

12 Timothy C. Pittsenbarger chase@lcpfirm.com

13 William Robert Urga wru@juwlaw.com, ls@juwlaw.com

14 b. **BY U.S. MAIL.** I deposited such envelope in the mail at Las Vegas, Nevada. The
15 envelope(s) were mailed with postage thereon fully prepaid. I am readily familiar with
16 Semenza Kircher Rickard's practice of collection and processing correspondence for
17 mailing. Under that practice, documents are deposited with the U.S. Postal Service on the
18 same day which is stated in the proof of service, with postage fully prepaid at Las Vegas,
Nevada in the ordinary course of business. I am aware that on motion of party served,
service is presumed invalid if the postal cancellation date or postage meter date is more than
one day after the date stated in this proof of service.

19 c. **BY PERSONAL SERVICE.**

20 d. **BY DIRECT EMAIL.**

21 e. **BY FACSIMILE TRANSMISSION.**

22 I declare under penalty of perjury that the foregoing is true and correct.

23
24 /s/ Olivia A. Kelly

25 An Employee of Semenza Kircher Rickard

EXHIBIT 1

EXHIBIT 1

08/14/23 10:18:09 PROFORMA STATEMENT FOR MATTER 392775.00002 (Winkler, Geoff - Receiver for J&J Consul) (General Receivership)

Preliminary Billing FormBilling Atty: 001842 - Del Castillo,
Joshua

Matter #: 392775.00002

Client Name: Winkler, Geoff - Receiver for J&J Consul

Date of Last Billing: 06/30/23

Matter Name: General Receivership

Proforma Number: 1229974

Client/Matter Joint Group # 392775.1

Client Matter Number:

Fees for Matter 392775.00002.(General Receivership)

Trans Date	Index	Description of Service Rendered	Timekeeper	Hours	Fees	Sum	Circle	Action		
04/03/23	9174989	Review file and notes and emails with Receiver's office, GT counsel, and AM counsel regarding pending case administration matters (0.9); confer with GT counsel and email inquiry to SEC regarding same (0.2); confer with Receiver's office regarding pending intervenor appeal (0.5); legal analysis of critical legal standards for intervenor appeal (1.0).	Del Castillo, Joshua	2.60	1,417.00	1,417.00	WO	HD	TR	_____
04/06/23	9177954	Prepare for and attend video conference with Receiver's office and Greenber Traurig counsel regarding pending case and estate administration matters (1.0); review notes from Receiver's office regarding same (0.2).	Del Castillo, Joshua	1.20	654.00	2,071.00	WO	HD	TR	_____
04/06/23	9203000	Virtually attend weekly meeting with Geoff Winkler and his team, Allen Matkins, and Greenberg Traurig regarding case updates and outstanding tasks	Pham, Matt D.	0.60	267.00	2,338.00	WO	HD	TR	_____
04/10/23	9180080	Review and respond to inquiries regarding case administration and developments from Receiver's office, D. Zaro, and Greenberg Traurig (0.6); review ninth circuit filings and	Del Castillo, Joshua	1.30	708.50	3,046.50	WO	HD	TR	_____

08/14/23 10:18:09 PROFORMA STATEMENT FOR MATTER 392775.00002 (Winkler, Geoff - Receiver for J&J Consul) (General Receivership)

Fees for Matter 392775.00002.(General Receivership)

Trans Date	Index	Description of Service Rendered	Timekeeper	Hours	Fees	Sum	Circle	Action		
		orders in connection with intervenor appeal and correspondence with D. Zaro, K. Hendricks, and M. Pham regarding same (0.6); follow-up with SEC regarding same (0.1).								
04/13/23	9183605	Prepare for and attend videoconference with Receiver's office and GT co-counsel (1.1); follow-up emails regarding same (0.2).	Del Castillo, Joshua	1.30	708.50	3,755.00	WO	HD	TR	_____
04/13/23	9203056	Virtually attend weekly meeting with Geoff Winkler and his team, Allen Matkins, and Greenberg Traurig regarding case updates and outstanding tasks	Pham, Matt D.	1.00	445.00	4,200.00	WO	HD	TR	_____
04/14/23	9184557	Review docket and recent court orders (0.5); confer with AM counsel regarding pending case administration matters (0.4).	Del Castillo, Joshua	0.90	490.50	4,690.50	WO	HD	TR	_____
04/17/23	9186551	Review notes and docket and attention to case administration matters (0.5).	Del Castillo, Joshua	0.50	272.50	4,963.00	WO	HD	TR	_____
04/18/23	9187762	Review new analysis regarding intervenor arguments and prepare for and attend teleconference with SEC regarding intervenor appeal (0.8).	Del Castillo, Joshua	0.80	436.00	5,399.00	WO	HD	TR	_____
04/20/23	9190307	Emails with J. Rickard and K. Hendricks regarding upcoming status conference (0.2); prepare for and attend video conference with Receiver's office and co-counsel regarding case and estate administration matters (1.0).	Del Castillo, Joshua	1.20	654.00	6,053.00	WO	HD	TR	_____

08/14/23 10:18:09 PROFORMA STATEMENT FOR MATTER 392775.00002 (Winkler, Geoff - Receiver for J&J Consul) (General Receivership)

Fees for Matter 392775.00002.(General Receivership)

Trans Date	Index	Description of Service Rendered	Timekeeper	Hours	Fees	Sum	Circle	Action		
04/24/23	9193066	Attention to issue regarding notice of appearance for Receiver in intervenor appeal (0.5).	Del Castillo, Joshua	0.50	272.50	6,325.50	WO	HD	TR	_____
04/25/23	9198267	Analysis and determination of document productions in preparation for attorney review.	Peng, Simona	0.30	105.00	6,430.50	WO	HD	TR	_____
04/27/23	9203201	Virtually attend weekly meeting with Geoff Winkler and his team, Allen Matkins, and Greenberg Traurig regarding case updates and outstanding tasks	Pham, Matt D.	0.40	178.00	6,608.50	WO	HD	TR	_____
05/01/23	9205068	Confer with D. Zaro and M. Pham regarding pending case and estate administration matters, including outstanding third party inquiries and filings, review related materials, and attention to same (1.5).	Del Castillo, Joshua	1.50	817.50	7,426.00	WO	HD	TR	_____
05/02/23	9205972	Attention to administrative issues regarding intervenor appeal (1.0); emails with D. Zaro, M. Pham, and counsel regarding pending case administration issues (0.5).	Del Castillo, Joshua	1.50	817.50	8,243.50	WO	HD	TR	_____
05/04/23	9208150	Prepare for and attend videoconference with Receiver and co-counsel at GT (0.7).	Del Castillo, Joshua	0.70	381.50	8,625.00	WO	HD	TR	_____
05/04/23	9234387	Virtually attend weekly meeting with client, Greenberg Traurig and Allen Matkins regarding case updates and outstanding tasks	Pham, Matt D.	0.40	178.00	8,803.00	WO	HD	TR	_____
05/08/23	9210551	Emails with client and counsel regarding case administration issues and attention to same (0.6).	Del Castillo, Joshua	0.60	327.00	9,130.00	WO	HD	TR	_____

08/14/23 10:18:09 PROFORMA STATEMENT FOR MATTER 392775.00002 (Winkler, Geoff - Receiver for J&J Consul) (General Receivership)

Fees for Matter 392775.00002.(General Receivership)

Trans Date	Index	Description of Service Rendered	Timekeeper	Hours	Fees	Sum	Circle	Action		
05/11/23	9213699	Review correspondence from Receiver's office regarding outstanding case administration matters and prepare updates regarding same (0.6); follow-up with M. Pham and D. Zaro regarding same (0.2); prepare for and attend videoconference with Receiver's office and GT co-counsel (0.4); follow-up emails to Receiver's office regarding same (0.2).	Del Castillo, Joshua	1.40	763.00	9,893.00	WO	HD	TR	_____
05/11/23	9234440	Virtually attend weekly meeting with client, Greenberg Traurig, and Allen Matkins regarding case updates and outstanding tasks	Pham, Matt D.	0.30	133.50	10,026.50	WO	HD	TR	_____
05/16/23	9217913	Review inquiry from counsel for J&J bankruptcy petitioning creditors and confer with M. Pham regarding bankruptcy case and related issues (0.8).	Del Castillo, Joshua	0.80	436.00	10,462.50	WO	HD	TR	_____
05/16/23	9234472	Phone call with petitioning creditors' counsel regarding receivership claims process	Pham, Matt D.	0.10	44.50	10,507.00	WO	HD	TR	_____
05/18/23	9220021	Teleconference with D. Zaro regarding case updates and outstanding case and estate administration issues (0.5); prepare for and attend videoconference with Receiver and GT co-counsel (0.5).	Del Castillo, Joshua	1.00	545.00	11,052.00	WO	HD	TR	_____
05/22/23	9223462	Review dockets and confer with AM counsel regarding pending case administration matters (0.6).	Del Castillo, Joshua	0.60	327.00	11,379.00	WO	HD	TR	_____
05/24/23	9225510	Legal analysis and emails with co-counsel at GT and D. Zaro regarding pre-	Del Castillo, Joshua	0.90	490.50	11,869.50	WO	HD	TR	_____

08/14/23 10:18:09 PROFORMA STATEMENT FOR MATTER 392775.00002 (Winkler, Geoff - Receiver for J&J Consul) (General Receivership)

Fees for Matter 392775.00002.(General Receivership)

Trans Date	Index	Description of Service Rendered	Timekeeper	Hours	Fees	Sum	Circle	Action		
		receivership entity attorney client privilege and related matters (0.7); teleconference with D. Zaro regarding same (0.2).								
05/25/23	9227458	Emails and confer with M. Pham regarding results of videoconference with client and attention to pending case administration matters (0.6).	Del Castillo, Joshua	0.60	327.00	12,196.50	WO	HD	TR	_____
05/25/23	9234551	Virtually attend weekly meeting with client, Greenberg Traurig, and Allen Matkins regarding case updates and outstanding tasks	Pham, Matt D.	0.30	133.50	12,330.00	WO	HD	TR	_____
05/31/23	9235623	Review docket and notes and attention to case administration matters (0.5).	Del Castillo, Joshua	0.50	272.50	12,602.50	WO	HD	TR	_____
06/01/23	9238015	Emails with Receiver's office and co-counsel regarding pending case administration matters (0.5); attention to issues regarding same (0.4); prepare follow-up to Receiver's office in advance of videoconference with Receiver and co-counsel (0.3); review correspondence from SEC and confer with M. Pham regarding same (0.2); prepare for and attend videoconference with Receiver and co-counsel (0.5); review intervenor appeal docket and confer with M. Pham regarding anticipated briefing (0.4).	Del Castillo, Joshua	2.30	1,253.50	13,856.00	WO	HD	TR	_____
06/01/23	9268295	Virtually attend weekly meeting with client, Greenberg Traurig, and Allen Matkins regarding case updates and outstanding tasks	Pham, Matt D.	0.30	133.50	13,989.50	WO	HD	TR	_____

08/14/23 10:18:09 PROFORMA STATEMENT FOR MATTER 392775.00002 (Winkler, Geoff - Receiver for J&J Consul) (General Receivership)

Fees for Matter 392775.00002.(General Receivership)

Trans Date	Index	Description of Service Rendered	Timekeeper	Hours	Fees	Sum	Circle	Action		
06/02/23	9238928	Detailed review of all case files and dockets and attention to case administration matters (1.2); emails and teleconferences with Receiver's office and AM counsel regarding pending deadlines and other matters (0.6)	Del Castillo, Joshua	1.80	981.00	14,970.50	WO	HD	TR	_____
06/04/23	9239757	Review Madsen counsel email regarding opposition to SEC proposed extension and emails to Receiver's office and co-counsel regarding same (0.4).	Del Castillo, Joshua	0.40	218.00	15,188.50	WO	HD	TR	_____
06/05/23	9240134	Prepare for and teleconference with D. Zaro regarding pending case administration issues (0.3).	Del Castillo, Joshua	0.30	163.50	15,352.00	WO	HD	TR	_____
06/07/23	9242648	Additional legal analysis in connection with anticipated appellate brief regarding intervention (1.5); prepare email update to AM team regarding same (0.5).	Del Castillo, Joshua	2.00	1,090.00	16,442.00	WO	HD	TR	_____
06/08/23	9243564	Review SEC appellate filing regarding intervenor caption (0.1); commence outline for argument section of respondent brief (0.5); review correspondence from defendant counsel regarding proposed SEC extension and Receiver's accounting and confer with AM counsel regarding same (0.5); prepare for and attend videoconference with Receiver and GT co-counsel (0.4).	Del Castillo, Joshua	1.50	817.50	17,259.50	WO	HD	TR	_____
06/15/23	9250036	Prepare for and attend videoconference with Receiver's office and GT co-counsel (0.4); follow-up emails to M. Pham, J. Robichaud, and A. Priebe regarding case admin matters (0.5).	Del Castillo, Joshua	0.90	490.50	17,750.00	WO	HD	TR	_____

08/14/23 10:18:09 PROFORMA STATEMENT FOR MATTER 392775.00002 (Winkler, Geoff - Receiver for J&J Consul) (General Receivership)

Fees for Matter 392775.00002.(General Receivership)

Trans Date	Index	Description of Service Rendered	Timekeeper	Hours	Fees	Sum	Circle	Action		
06/16/23	9251198	Review Madsen pleadings and emails to M. Pham regarding turnover and related matters (0.9).	Del Castillo, Joshua	0.90	490.50	18,240.50	WO	HD	TR	_____
06/23/23	9257445	Review Receiver responses to Madsen filings (0.4).	Del Castillo, Joshua	0.40	218.00	18,458.50	WO	HD	TR	_____
06/26/23	9258535	Review docket and emails with AM and GT counsel regarding outstanding case and estate administration matters (0.8); follow-up correspondence with local counsel regarding upcoming hearing (0.2).	Del Castillo, Joshua	1.00	545.00	19,003.50	WO	HD	TR	_____
06/28/23	9261643	Review notes and docket and emails with Receiver's office and co-counsel in connection with pending case administration matters and in anticipation of upcoming status conference (0.7); attend to docketing inquiry (0.2); review SEC response to Madsen filing (0.1).	Del Castillo, Joshua	1.00	545.00	19,548.50	WO	HD	TR	_____
06/29/23	9262097	Prepare for and attend status conference via Zoom (0.8); emails to D. Zaro and M. Pham regarding report requested by court (0.2).	Del Castillo, Joshua	1.00	545.00	20,093.50	WO	HD	TR	_____

Disbursements for Matter 392775.00002 (General Receivership)

Trans Date	Index	Type	Quantity	Amt	Circle	Action		
04/01/23	2814007	EDISC – CS Disco, Inc. - Monthly Hosting for April 2023	0.00	169.44	WO	HD	TR	_____
04/04/23	2822501	DCSRCH – Document Search - - PACER - Usage 1st QTR	0.00	24.10	WO	HD	TR	_____

08/14/23 10:18:09 PROFORMA STATEMENT FOR MATTER 392775.00002 (Winkler, Geoff - Receiver for J&J Consul) (General Receivership)

Disbursements for Matter 392775.00002 (General Receivership)

Trans Date	Index	Type	Quantity	Amt				
04/04/23	2822502	DCSRCH – Document Search - - PACER - Usage 1st QTR	0.00	17.30	WO	HD	TR	_____
04/05/23	2812987	POS – Nationwide Legal, LLC - Citibank, National Association, SUBPOENA TO PRODUCE DOCUMENTS, INFORMATION, OR OBJECTS OR TO PERMIT INSPECTION OF PREMISES IN A CIVIL ACTION	0.00	301.00	WO	HD	TR	_____
04/05/23	2812988	POS – Nationwide Legal, LLC - JPMorgan Chase Bank, National Association, SUBPOENA TO PRODUCE DOCUMENTS, INFORMATION, OR OBJECTS OR TO PERMIT INSPECTION OF PREMISES IN A CIVIL ACTION	0.00	301.00	WO	HD	TR	_____
04/11/23	2812092	ODS – America First Credit Union - Document production by the credit union in response to a subpoena issued by the Receiver, Geoff Winkler.	0.00	122.25	WO	HD	TR	_____
05/01/23	2817973	EDISC – CS Disco, Inc. - Monthly Hosting for May 2023	0.00	169.44	WO	HD	TR	_____
06/01/23	2823065	EDISC – CS Disco, Inc. - Monthly Hosting for June 2023	0.00	169.44	WO	HD	TR	_____

Proforma Summary

Timekeeper

Number	Timekeeper	Hours	Rate	Amounts
001842	Del Castillo, Joshua	33.90	545.00	18,475.50
002307	Peng, Simona	0.30	350.00	105.00
002510	Pham, Matt D.	3.40	445.00	1,513.00
		<u>37.60</u>		<u>\$20,093.50</u>
Subtotal Fees				\$20,093.50
Discount				0.00
Total Fees				20,093.50
Total Disbursements				1,273.97

Attorney Billing Instructions

- | | |
|--------------------|-------------------------|
| () BILL ALL | () Hold |
| () BILL FEES ONLY | () Write Off |
| () BILL COST ONLY | () <u>Transfer All</u> |

08/14/23 10:18:09 PROFORMA STATEMENT FOR MATTER 392775.00002 (Winkler, Geoff - Receiver for J&J Consul) (General Receivership)

Billing Instructions

expires 6/30/2024: Partners @ 545; Assoc @ 445; Paralegals @ 350

Account Summary – As Of 08/01/23

	Fiscal YTD			Calendar YTD			LTD		
	Total	Fees	Disb.	Total	Fees	Disb.	Total	Fees	Disbursements
Worked	11,827.38	11,722.50	104.88	57,671.02	55,351.00	2,320.02	161,136.08	146,239.50	14,896.58
Unbilled Adj	0.00	0.00	0.00	12.51	12.51	0.00	1,786.10	1,442.10	344.00
Billed	0.00	0.00	0.00	58,079.30	49,539.51	8,539.79	113,224.42	113,224.42	13,622.61
Collected	0.00	0.00	0.00	58,079.30	49,539.51	8,539.79	126,847.03	113,224.42	13,622.61
AR Write Off	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00
WIP	33,714.27	31,816.00	1,898.27						
Balance									
AR Balance	0.00	0.00	0.00						
Unalloc	0.00								
Payment									
Client Trust	0.00								
Balance									

Billing Address

Winkler, Geoff - Receiver for J&J Consulting Services, Inc.; J and J Purchasing
 LLC; The Judd Irrevocable Trust; BJ Holdings LLC
 Geoff B. Winkler
 American Fiduciary Services LLC
 715 NW Hoyt Street, Suite 4364
 Portland, OR 97208

08/14/23 10:18:10 PROFORMA STATEMENT FOR MATTER 392775.00003 (Winkler, Geoff - Receiver for J&J Consul) (Asset Recovery & Management)

Preliminary Billing FormBilling Atty: 001842 - Del Castillo,
Joshua

Matter #: 392775.00003

Client Name: Winkler, Geoff - Receiver for J&J Consul

Date of Last Billing: 06/30/23

Matter Name: Asset Recovery & Management

Proforma Number: 1229974

Client/Matter Joint Group # 392775.1

Client Matter Number:

Fees for Matter 392775.00003.(Asset Recovery & Management)

Trans Date	Index	Description of Service Rendered	Timekeeper	Hours	Fees	Sum	Circle	Action		
04/03/23	9174967	Emails with Receiver's office and AM counsel regarding account turnovers (0.5); follow-up emails to bank counsel (0.5).	Del Castillo, Joshua	1.00	545.00	545.00	WO	HD	TR	_____
04/03/23	9177539	Follow-up with counsel related to the recovery of additional defendant bank accounts and strategy as to turnover (.6). Call/email concerning asset turnover demands, prospective motion/OSC (.5).	Zaro, David	1.10	599.50	1,144.50	WO	HD	TR	_____
04/03/23	9202949	Draft additional subpoenas to Wells Fargo, Citibank, and JPMorgan Chase Bank	Pham, Matt D.	1.30	578.50	1,723.00	WO	HD	TR	_____
04/05/23	9176741	Review and respond to inquiries from bank counsel regarding turnover of entity and defendant accounts (0.6); review materials provided by counsel in connection with same (1.0); emails with Receiver's office and review revised summary provided by Receiver in connection with same (0.5).	Del Castillo, Joshua	2.10	1,144.50	2,867.50	WO	HD	TR	_____
04/05/23	9177706	Research/analysis of convertible debentures and assignments, requirements and communications with Flavocure	Zaro, David	2.60	1,417.00	4,284.50	WO	HD	TR	_____

08/14/23 10:18:10 PROFORMA STATEMENT FOR MATTER 392775.00003 (Winkler, Geoff - Receiver for J&J Consul) (Asset Recovery & Management)

Fees for Matter 392775.00003.(Asset Recovery & Management)

Trans Date	Index	Description of Service Rendered	Timekeeper	Hours	Fees	Sum	Circle	Action		
		counsel (1.2). Revise/draft assignment documents for the defendants and follow-up (1.40).								
04/06/23	9177461	Emails and teleconferences with M. Pham and J. Robichaud regarding second round demand letters regarding turnovers and transmit additional materials received from Receiver's office (0.6); review of Receiver account analysis and confer with Receiver's office and counsel team regarding same (1.0); emails and teleconferences with D. Zaro regarding same (0.5).	Del Castillo, Joshua	2.10	1,144.50	5,429.00	WO	HD	TR	_____
04/06/23	9177561	Review draft Flavocure assignments and confer with D. Zaro regarding same (0.5); confer with D. Zaro and M. Pham regarding account turnover analysis and summary received from Receiver's office (0.6).	Del Castillo, Joshua	1.10	599.50	6,028.50	WO	HD	TR	_____
04/06/23	9180043	Finalize the assignment documents for J&J/individual defendant investors and email to Receiver/Ms. Deering regarding Flavocure (.7). Emails with Ms. Deering and call with counsel related to the assignments (.4).	Zaro, David	1.10	599.50	6,628.00	WO	HD	TR	_____
04/07/23	9178866	Review materials received from Receiver's office regarding accounting for bank accounts at various institutions (0.7); legal analysis of turnover inquiry (0.5); commence preparation of revised template turnover stipulation and confer with D. Zaro regarding same (0.8).	Del Castillo, Joshua	2.00	1,090.00	7,718.00	WO	HD	TR	_____

08/14/23 10:18:10 PROFORMA STATEMENT FOR MATTER 392775.00003 (Winkler, Geoff - Receiver for J&J Consul) (Asset Recovery & Management)

Fees for Matter 392775.00003.(Asset Recovery & Management)

Trans Date	Index	Description of Service Rendered	Timekeeper	Hours	Fees	Sum	Circle	Action		
04/07/23	9180141	Work with counsel on the foundation, evidence to support lawsuit, draft complaint, review causes of action with counsel.	Zaro, David	0.60	327.00	8,045.00	WO	HD	TR	_____
04/11/23	9181309	Review notes, prior correspondence, and emails with defendants' pre-receivership counsel and attention to fund turnover issues (2.3); emails with K. Hendricks regarding same (0.3); teleconference with K. Hendricks regarding same (0.2).	Del Castillo, Joshua	2.80	1,526.00	9,571.00	WO	HD	TR	_____
04/11/23	9182467	Draft email updating J. del Castillo regarding retainer paid to Defendant Jager's attorney J. Bell, including communications with J. Bell's attorney, B. Gamos (.1).	Robichaud, James	0.10	44.50	9,615.50	WO	HD	TR	_____
04/12/23	9182280	Review Court orders, notes from hearings, and correspondence with counsel for banks regarding completed, pending, and requested turnovers of funds (1.5); analysis of legal issues raised by counsel for banks with respect to relief defendant turnover and prepare inquiries to Receiver's office (1.3); review and respond to correspondence regarding attorney turnovers and confer with D. Zaro regarding same (0.8).	Del Castillo, Joshua	3.60	1,962.00	11,577.50	WO	HD	TR	_____
04/12/23	9183588	Evaluate email from Receiver/Ms. Deering related to assignment contact and revise agreement, email response.	Zaro, David	0.40	218.00	11,795.50	WO	HD	TR	_____
04/12/23	9203032	Prepare and review inventory of documents produced by third parties to date and draft email to David Zaro regarding such inventory	Pham, Matt D.	1.70	756.50	12,552.00	WO	HD	TR	_____

08/14/23 10:18:10 PROFORMA STATEMENT FOR MATTER 392775.00003 (Winkler, Geoff - Receiver for J&J Consul) (Asset Recovery & Management)

Fees for Matter 392775.00003.(Asset Recovery & Management)

Trans Date	Index	Description of Service Rendered	Timekeeper	Hours	Fees	Sum	Circle	Action		
04/13/23	9183602	Review new Ninth Circuit decision regarding discovery rule and limitations period in connection with prospective claims by receiver, prepare notes, and confer with AM counsel regarding same (1.3)	Del Castillo, Joshua	1.30	708.50	13,260.50	WO	HD	TR	_____
04/13/23	9183739	Review correspondence and emails with Receiver's office and K. Hendricks regarding attorney turnovers of funds (0.6).	Del Castillo, Joshua	0.60	327.00	13,587.50	WO	HD	TR	_____
04/17/23	9186292	Review correspondence from Wells Fargo counsel regarding contemplated turnovers and review materials transmitted by Wells Fargo in connection with same (1.0); correspondence with Receiver's office regarding same (0.5); confer with AM counsel regarding contemplated stipulations regarding turnover (0.7); review documents in connection with same (1.0).	Del Castillo, Joshua	3.20	1,744.00	15,331.50	WO	HD	TR	_____
04/18/23	9187765	Teleconference with D. Zaro regarding contemplated revisions to requested turnover stipulation (0.3); revise template turnover stipulation (1.2); review correspondence and materials from A. Deering regarding turnovers (0.5); review materials provided by Wells Fargo in connection with subject bank accounts (0.5); teleconference with J. Robichaud regarding additional stipulations and follow-up emails regarding same (0.5); review materials transmitted by other banks and financial institutions in connection with pending turnover requests and attention to issues arising in connection with same (1.4).	Del Castillo, Joshua	4.40	2,398.00	17,729.50	WO	HD	TR	_____

08/14/23 10:18:10 PROFORMA STATEMENT FOR MATTER 392775.00003 (Winkler, Geoff - Receiver for J&J Consul) (Asset Recovery & Management)

Fees for Matter 392775.00003.(Asset Recovery & Management)

Trans Date	Index	Description of Service Rendered	Timekeeper	Hours	Fees	Sum	Circle Action			
04/18/23	9191197	Several emails/analysis of the court orders and develop approach to bank and defendant account transfers (.4). Advice to counsel related to stipulation for and legal underpinning for demands (.3).	Zaro, David	0.70	381.50	18,111.00	WO	HD	TR	_____
04/19/23	9189929	Confer with D. Zaro regarding revised turnover stipulation and emails regarding same (0.5); review additional documents received from banks and Receiver's office and confer with J. Robichaud regarding necessary stipulations (1.9).	Del Castillo, Joshua	2.40	1,308.00	19,419.00	WO	HD	TR	_____
04/19/23	9191313	Further analysis of orders related turnover and draft stipulation for defendants and banks to turnover accounts (.7). Emails/call with Receiver counsel related to the form of stipulation/possible OSC (.4).	Zaro, David	1.10	599.50	20,018.50	WO	HD	TR	_____
04/19/23	9203121	Draft email to Kyle Ewing regarding explanation of document production from banks (0.2); Draft email to client regarding documents relating to Expert Litigation Services (0.2)	Pham, Matt D.	0.40	178.00	20,196.50	WO	HD	TR	_____
04/20/23	9190255	Confer with M. Pham regarding prospective EcoBattery claims and draft complaint (0.5); email to atty J. Sellers regarding turnover inquiry and review notes regarding same (0.4).	Del Castillo, Joshua	0.90	490.50	20,687.00	WO	HD	TR	_____
04/21/23	9190844	Emails with third parties regarding turnover of assets and outstanding Receiver demands (0.8).	Del Castillo, Joshua	0.80	436.00	21,123.00	WO	HD	TR	_____

08/14/23 10:18:10 PROFORMA STATEMENT FOR MATTER 392775.00003 (Winkler, Geoff - Receiver for J&J Consul) (Asset Recovery & Management)

Fees for Matter 392775.00003.(Asset Recovery & Management)

Trans Date	Index	Description of Service Rendered	Timekeeper	Hours	Fees	Sum	Circle	Action		
04/24/23	9193431	Confer with J. Robichaud regarding turnover subpoenas (0.5); review materials received from Receiver's office and Wells Fargo regarding same and deliver to J. Robichaud for discussion (0.5).	Del Castillo, Joshua	1.00	545.00	21,668.00	WO	HD	TR	_____
04/24/23	9194516	Draft turnover stipulations for defendants and relief defendants (1.1).	Robichaud, James	1.10	489.50	22,157.50	WO	HD	TR	_____
04/24/23	9203150	Draft email to Kyle Ewing regarding notice to US Bank and Wells Fargo relating to subpoena from Madsen (0.2); Confer with Josh del Castillo regarding Greenberg Traurig's draft response to Wells Fargo subpoena (0.1)	Pham, Matt D.	0.30	133.50	22,291.00	WO	HD	TR	_____
04/25/23	9194211	Emails and confer with J. Robichaud regarding turnover stipulations (0.3).	Del Castillo, Joshua	0.30	163.50	22,454.50	WO	HD	TR	_____
04/25/23	9194515	Draft turnover stipulations for defendants and relief defendants (1.5).	Robichaud, James	1.50	667.50	23,122.00	WO	HD	TR	_____
04/26/23	9195730	Review draft turnover stipulations and confer with J. Robichaud regarding same (0.6); review documents and emails to Receiver's office regarding same (0.4); review and respond to correspondence from bank counsel regarding turnover and other account inquiries and follow-up regarding same (0.7); legal analysis for anticipated fraud complaint and email follow-ups to AM counsel regarding same (2.4).	Del Castillo, Joshua	4.10	2,234.50	25,356.50	WO	HD	TR	_____
04/26/23	9203188	Draft emails to US Bank and Wells Fargo regarding notice of Receiver's receipt of	Pham, Matt D.	0.70	311.50	25,668.00	WO	HD	TR	_____

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Fees for Matter 392775.00003.(Asset Recovery & Management)

Trans Date	Index	Description of Service Rendered	Timekeeper	Hours	Fees	Sum	Circle	Action		
		subpoena seeking material protected under stipulated protective order								
04/27/23	9197708	Review documents and confer with J. Robichaud regarding asset turnover matters (0.7).	Del Castillo, Joshua	0.70	381.50	26,049.50	WO	HD	TR	_____
04/27/23	9203241	Confer with local counsel regarding notice to US Bank re Wells Fargo subpoena and draft email to US Bank's counsel regarding notice of Receiver's receipt of such subpoena seeking material protected under stipulated protective order	Pham, Matt D.	0.30	133.50	26,183.00	WO	HD	TR	_____
05/01/23	9205063	Correspondence with Receiver's office regarding turnover demands and stipulations and review materials in connection with same (1.1).	Del Castillo, Joshua	1.10	599.50	26,782.50	WO	HD	TR	_____
05/01/23	9207090	Evaluate draft of Eco Battery complaint, meeting with counsel related to coordinated strategy and follow-up.	Zaro, David	0.60	327.00	27,109.50	WO	HD	TR	_____
05/02/23	9206222	Review documents and follow-up emails with M. Pham and bank counsel regarding outstanding turnover issues (1.5).	Del Castillo, Joshua	1.50	817.50	27,927.00	WO	HD	TR	_____
05/03/23	9207129	Legal analysis regarding extent of presiding court's authority over receivership res and confer with J. Robichaud regarding same (1.4).	Del Castillo, Joshua	1.40	763.00	28,690.00	WO	HD	TR	_____
05/04/23	9208026	Prepare for and video conference with Receiver's office and J. Robichaud regarding turnover issues and prospective defendant-related accounts and associated	Del Castillo, Joshua	2.30	1,253.50	29,943.50	WO	HD	TR	_____

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Fees for Matter 392775.00003.(Asset Recovery & Management)

Trans Date	Index	Description of Service Rendered	Timekeeper	Hours	Fees	Sum	Circle Action			
		analysis (0.6); follow-up emails regarding same (0.8); review Grigsby and Beasley opposition and Receiver reply regarding turnover of funds and confer regarding same (0.9).								
05/05/23	9208904	Review and respond to correspondence from M. Pham and bank counsel regarding pending turnover demands or follow-ups for additional information and attention to issues regarding same (1.1).	Del Castillo, Joshua	1.10	599.50	30,543.00	WO	HD	TR	_____
05/05/23	9234403	Draft email to Greenberg Traurig and Grigsby's counsel regarding stipulation for protective order	Pham, Matt D.	0.20	89.00	30,632.00	WO	HD	TR	_____
05/09/23	9234415	Phone call with US Bank's counsel regarding US Bank account issues (0.2); Draft email to US Bank's counsel regarding miscellaneous withdrawal transaction information (0.2)	Pham, Matt D.	0.40	178.00	30,810.00	WO	HD	TR	_____
05/10/23	9212691	Review email from Receiver regarding B of A turnover issues, review file and notes, and confer with M. Pham regarding same (1.0); follow-up with atty Sellers regarding application of receivership funds and turnover issues and confer with atty Sellers regarding documents provided and reviewed (0.7); legal analysis in connection with prospective turnover demands (0.7); emails to co-counsel regarding same (0.4).	Del Castillo, Joshua	2.80	1,526.00	32,336.00	WO	HD	TR	_____
05/10/23	9216774	Follow-up on several emails, confer with counsel to address bank turnovers, status of stipulations and advice as to next steps.	Zaro, David	0.60	327.00	32,663.00	WO	HD	TR	_____

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Fees for Matter 392775.00003.(Asset Recovery & Management)

Trans Date	Index	Description of Service Rendered	Timekeeper	Hours	Fees	Sum	Circle	Action		
05/11/23	9214141	Email correspondence with Receiver's office regarding defendant attorney turnovers (0.3); follow-up emails to M. Pham and local counsel regarding prospective Eco Battery claims and review materials in connection with same (1.5).	Del Castillo, Joshua	1.80	981.00	33,644.00	WO	HD	TR	_____
05/11/23	9234439	Draft email to Bank of America representative regarding turnover of account funds	Pham, Matt D.	0.20	89.00	33,733.00	WO	HD	TR	_____
05/12/23	9216229	Review documents and email correspondence with Receiver's office and M. Pham regarding outstanding asset recovery and turnover demand issues (1.1); follow-up teleconference regarding same (0.5).	Del Castillo, Joshua	1.60	872.00	34,605.00	WO	HD	TR	_____
05/15/23	9216801	Emails and confer with M. Pham regarding pending turnover matters and prepare update to Receiver's office regarding same (0.7).	Del Castillo, Joshua	0.70	381.50	34,986.50	WO	HD	TR	_____
05/15/23	9234466	Phone call with Bank of America representative regarding funds and accounts issues (0.2); Draft facsimile letter to Bank of America regarding funds and accounts issue (0.5)	Pham, Matt D.	0.70	311.50	35,298.00	WO	HD	TR	_____
05/16/23	9217933	Confer with M. Pham and prepare inquires to Receiver's office and J. Robichaud regarding turnover stipulations and accounting (0.6); confer with M. Pham regarding pending Bank of America turnover (0.2).	Del Castillo, Joshua	0.80	436.00	35,734.00	WO	HD	TR	_____

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Fees for Matter 392775.00003.(Asset Recovery & Management)

Trans Date	Index	Description of Service Rendered	Timekeeper	Hours	Fees	Sum	Circle Action			
05/16/23	9234468	Phone call with Bank of America representative regarding frozen accounts and turnover of account funds (0.2); Draft multiple emails to client regarding update on Bank of America accounts (0.2); Prepare new subpoenas to US Bank and US Bancorp following communications with US Bank's counsel (0.5); Review and analyze Flavocure's corporate update document (0.2); Draft email to Bank of America representative regarding payment instructions and draft email to client regarding forthcoming payment from Bank of America (0.3)	Pham, Matt D.	1.40	623.00	36,357.00	WO	HD	TR	_____
05/17/23	9234493	Phone call with Bank of America representative regarding unfreezing account and draft email to client regarding same (0.1); Draft letter to Bank of America regarding unfreezing of Paula Beasley account (0.2)	Pham, Matt D.	0.30	133.50	36,490.50	WO	HD	TR	_____
05/18/23	9220130	Emails and teleconference with D. Zaro regarding Flavorcure developments and prepare notes for discussion with Receiver's office and counsel regarding same (0.7); legal analysis of prospective claims arising in connection with third party investments of Ponzi funds (1.6); review and respond to correspondence from Receiver's office regarding supplemental bank account turnover review and attention to issues regarding same (1.0).	Del Castillo, Joshua	3.30	1,798.50	38,289.00	WO	HD	TR	_____

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Fees for Matter 392775.00003.(Asset Recovery & Management)

Trans Date	Index	Description of Service Rendered	Timekeeper	Hours	Fees	Sum	Circle	Action		
05/18/23	9220372	Complete draft turnover stipulations for remaining defendants (2.6).	Robichaud, James	2.60	1,157.00	39,446.00	WO	HD	TR	_____
05/18/23	9223345	Several emails concerning the status of Flavocure, follow-up on the timing/prospects for payoff (.4). Email related to assignments of convertible debentures and follow-up (.5).	Zaro, David	0.90	490.50	39,936.50	WO	HD	TR	_____
05/19/23	9221297	Emails with Receiver's office and co-counsel regarding turnover accounting and related demands (0.6); review documents in connection with same (0.5).	Del Castillo, Joshua	1.10	599.50	40,536.00	WO	HD	TR	_____
05/22/23	9225648	Evaluate email from Mr. McGraw and attached sale agreements, addendum, follow-up advice to counsel concerning stipulation.	Zaro, David	0.40	218.00	40,754.00	WO	HD	TR	_____
05/23/23	9224673	Follow-up emails with J. Robichaud regarding analysis of accounts associated with U.S. Bank turnover inquiry (0.4); review documents forwarded in connection with same (0.5).	Del Castillo, Joshua	0.90	490.50	41,244.50	WO	HD	TR	_____
05/23/23	9225345	Review and account for payments made by US Bank and USBI to the receiver, comparing amounts paid by US Bank against prior certified statements of US Bank stating receivership account balances (2.4).	Robichaud, James	2.40	1,068.00	42,312.50	WO	HD	TR	_____
05/24/23	9225513	Review updated U.S. Bank turnover accounting and confer with J. Robichaud regarding same (0.9); review additional materials provided by J. Robichaud (0.5);	Del Castillo, Joshua	2.10	1,144.50	43,457.00	WO	HD	TR	_____

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Fees for Matter 392775.00003.(Asset Recovery & Management)

Trans Date	Index	Description of Service Rendered	Timekeeper	Hours	Fees	Sum	Circle Action				
		prepare update to Receiver's office (0.5); teleconference with A. Priebe regarding same (0.2).									
05/26/23	9230165	Follow-up emails to J. Robichaud regarding turnover of funds and accounting summary regarding same (0.5); review and respond to correspondence from bank counsel regarding turnover (0.5).	Del Castillo, Joshua	1.00	545.00	44,002.00	WO	HD	TR	_____	
05/30/23	9231103	Review accounting provided by U.S. Bank regarding turnovers and real property release and confer with J. Robichaud regarding same (0.5); follow-up emails to Receiver's office (0.3); prepare detailed omnibus tracking chart and follow-up inquiries to bank counsel regarding pending turnover and frozen accounts (1.4); emails to bank counsel (0.4).	Del Castillo, Joshua	2.60	1,417.00	45,419.00	WO	HD	TR	_____	
06/01/23	9238174	Additional analysis of US Bank turnovers and potentially outstanding accounts recoverable by Receiver (1.5).	Robichaud, James	1.50	667.50	46,086.50	WO	HD	TR	_____	
06/01/23	9238190	Review accounting summary transmitted by J. Robichaud and emails and confer with J. Robichaud regarding same (0.5).	Del Castillo, Joshua	0.50	272.50	46,359.00	WO	HD	TR	_____	
06/02/23	9238931	Confer with J. Robichaud regarding results of turnover analysis and next steps regarding same (0.5); confer with D. Zaro and review draft assignment documents for Receiver (0.2).	Del Castillo, Joshua	0.70	381.50	46,740.50	WO	HD	TR	_____	
06/02/23	9241172	Review drafts of assignment, several emails and work related to the assignments of	Zaro, David	0.80	436.00	47,176.50	WO	HD	TR	_____	

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Fees for Matter 392775.00003.(Asset Recovery & Management)

Trans Date	Index	Description of Service Rendered	Timekeeper	Hours	Fees	Sum	Circle	Action		
		convertable debentures (.5). Several conferences and follow-up on emails related to discovery, records from the SEC/FBI coordination. (.3).								
06/06/23	9241318	Confer with J. Robichaud and follow-up emails to bank counsel regarding pending turnover issues (0.6); additional legal analysis in connection with prospective motion to compel (1.4).	Del Castillo, Joshua	2.00	1,090.00	48,266.50	WO	HD	TR	_____
06/06/23	9242633	Review of the outstanding turnover letters/demands and meeting with Receiver counsel to address strategy and legal issues.	Zaro, David	0.60	327.00	48,593.50	WO	HD	TR	_____
06/06/23	9268380	Draft multiple emails to client regarding Wells Fargo accounts	Pham, Matt D.	0.20	89.00	48,682.50	WO	HD	TR	_____
06/07/23	9242304	Confer with J. Robichaud regarding pending turnover issues and analysis and review related documents (0.5).	Del Castillo, Joshua	0.50	272.50	48,955.00	WO	HD	TR	_____
06/07/23	9242352	Correspond with A. Priebe regarding US Bank accounts potentially subject to freeze or turnover (.3).	Robichaud, James	0.30	133.50	49,088.50	WO	HD	TR	_____
06/08/23	9243713	Review emails from Receiver's office regarding recently recovered assets and prepare update and inquiry regarding sales (0.5).	Del Castillo, Joshua	0.50	272.50	49,361.00	WO	HD	TR	_____
06/09/23	9268438	Phone call with US Bank's counsel regarding the Receiver's proposed production of US Bank's records to Wells Fargo	Pham, Matt D.	0.30	133.50	49,494.50	WO	HD	TR	_____

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Fees for Matter 392775.00003.(Asset Recovery & Management)

Trans Date	Index	Description of Service Rendered	Timekeeper	Hours	Fees	Sum	Circle	Action		
06/15/23	9250038	Review correspondence from Wells Fargo counsel regarding anticipated additional turnover and confer with J. Robichaud regarding same (0.5).	Del Castillo, Joshua	0.50	272.50	49,767.00	WO	HD	TR	_____
06/15/23	9268505	Draft email to Wells Fargo's counsel regarding account questions from client	Pham, Matt D.	0.30	133.50	49,900.50	WO	HD	TR	_____
06/16/23	9254816	Review/evaluate the outstanding defendant's return of assets and accounts, including Mr. Madsen, evaluate Madsen response/motion.	Zaro, David	0.70	381.50	50,282.00	WO	HD	TR	_____
06/20/23	9253377	Confer with J. Robichaud and emails to the Receiver's office regarding pending turnover issues (0.6).	Del Castillo, Joshua	0.60	327.00	50,609.00	WO	HD	TR	_____
06/23/23	9257092	Emails and teleconferences with M. Pham and J. Robichaud regarding outstanding turnover issues (0.9); review documents and correspondence from Wells Fargo and Receiver's office regarding same (0.6).	Del Castillo, Joshua	1.50	817.50	51,426.50	WO	HD	TR	_____
06/23/23	9268642	Draft email to Wells Fargo regarding documents missing relating to one account	Pham, Matt D.	0.20	89.00	51,515.50	WO	HD	TR	_____
06/26/23	9258537	Follow-up with J. Robichaud re outstanding turnover requests and associated accounting (0.5); review materials transmitted by client in connection with same (0.6).	Del Castillo, Joshua	1.10	599.50	52,115.00	WO	HD	TR	_____
06/26/23	9263192	Calls with Receiver counsel concerning Eco-Battery and Flavocure matters, recovery and next steps.	Zaro, David	0.40	218.00	52,333.00	WO	HD	TR	_____

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Fees for Matter 392775.00003.(Asset Recovery & Management)

Trans Date	Index	Description of Service Rendered	Timekeeper	Hours	Fees	Sum	Circle	Action
06/28/23	9261866	Review and respond to correspondence from Wells Fargo counsel regarding turnover (0.2); confer with J. Robichaud and prepare update to Receiver's office regarding same (0.3).	Del Castillo, Joshua	0.50	272.50	52,605.50	WO	HD TR

Proforma Summary

Timekeeper

Number	Timekeeper	Hours	Rate	Amounts
000313	Zaro, David	12.60	545.00	6,867.00
001842	Del Castillo, Joshua	68.90	545.00	37,550.50
002510	Pham, Matt D.	8.90	445.00	3,960.50
002592	Robichaud, James	9.50	445.00	4,227.50
		<u>99.90</u>		<u>\$52,605.50</u>
Subtotal Fees				\$52,605.50
Discount				0.00
Total Fees				52,605.50
Total Disbursements				0.00

Attorney Billing Instructions

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

Billing Instructions

expires 6/30/2024: Partners @ 545; Assoc @ 445; Paralegals @ 350

Account Summary – As Of 08/01/23

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

08/14/23 10:18:10 PROFORMA STATEMENT FOR MATTER 392775.00003 (Winkler, Geoff - Receiver for J&J Consul) (Asset Recovery & Management)

Worked	3,869.50	3,869.50	0.00	88,331.50	88,331.50	0.00	207,639.50	207,639.50	0.00
Unbilled Adj	0.00	0.00	0.00	1,090.00	1,090.00	0.00	4,868.39	4,823.07	45.32
Billed	0.00	0.00	0.00	78,838.50	78,838.50	0.00	146,450.07	146,450.07	0.00
Collected	0.00	0.00	0.00	78,838.50	78,838.50	0.00	146,450.07	146,450.07	0.00
AR Write Off	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00
	Total	Fees	Costs						
WIP	56,697.50	56,697.50	0.00						
Balance									
AR Balance	0.00	0.00	0.00						
Unalloc	0.00								
Payment									
Client Trust	0.00								
Balance									

Billing Address

Winkler, Geoff - Receiver for J&J Consulting Services, Inc.; J and J Purchasing
 LLC; The Judd Irrevocable Trust; BJ Holdings LLC
 Geoff B. Winkler
 American Fiduciary Services LLC
 715 NW Hoyt Street, Suite 4364
 Portland, OR 97208

08/14/23 10:18:12 PROFORMA STATEMENT FOR MATTER 392775.00004 (Winkler, Geoff - Receiver for J&J Consul) (Investigation & Reporting)

Preliminary Billing FormBilling Atty: 001842 - Del Castillo,
Joshua

Matter #: 392775.00004

Client Name: Winkler, Geoff - Receiver for J&J Consul

Date of Last Billing: 06/30/23

Matter Name: Investigation & Reporting

Proforma Number: 1229974

Client/Matter Joint Group # 392775.1

Client Matter Number:

Fees for Matter 392775.00004.(Investigation & Reporting)

Trans Date	Index	Description of Service Rendered	Timekeeper	Hours	Fees	Sum	Circle	Action		
04/01/23	9171352	Review notes and prepare follow-up inquiries regarding outstanding subpoenas and document requests (0.6).	Del Castillo, Joshua	0.60	327.00	327.00	WO	HD	TR	_____
04/03/23	9174971	Emails with Receiver's office and GT counsel regarding upcoming interim report (0.5); review notes and materials prepared by AM during prior quarter and commence draft summary of same (0.8).	Del Castillo, Joshua	1.30	708.50	1,035.50	WO	HD	TR	_____
04/04/23	9175864	Emails with AM team regarding follow-up document demands and subpoenas (0.5); review summary of materials obtained to date and attention to outstanding demands (0.7).	Del Castillo, Joshua	1.20	654.00	1,689.50	WO	HD	TR	_____
04/05/23	9177102	Review subpoenas served by counsel for defendant R. Madsen and confer with AM counsel regarding same (0.5).	Del Castillo, Joshua	0.50	272.50	1,962.00	WO	HD	TR	_____
04/05/23	9177723	Evaluate status of subpoena and conference with counsel as to additional defendants, bank records and strategy for turnover and accounting.	Zaro, David	0.30	163.50	2,125.50	WO	HD	TR	_____

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04/06/23	9177584	Review voicemail and teleconferences with D. Zaro and M. Pham regarding pending subpoena responses and development of baseline production set (0.5).	Del Castillo, Joshua	0.50	272.50	2,398.00	WO	HD	TR	_____
04/06/23	9180058	Evaluate issues/timing of bank account analysis and demands on Wells Fargo/U.S. Bank for turnovers, stipulation and follow-up with Receiver and counsel (.6). Several emails with Receiver/counsel (.4). Evaluate client email, then attend meeting with Receiver, Ms. Deering, Ms. Barknahoy, Mr. Hall and follow-up regarding same (.9), Conference with counsel related to inter-pleader appeal (.4).	Zaro, David	2.30	1,253.50	3,651.50	WO	HD	TR	_____
04/07/23	9178872	Review additional subpoena to Receiver (0.2); analysis and response to correspondence regarding proposed response and prospective opposition to same (0.9).	Del Castillo, Joshua	1.10	599.50	4,251.00	WO	HD	TR	_____
04/07/23	9180165	Preliminary analysis and review of subpoenas from third parties, Receiver response, protective order and email to Receiver.	Zaro, David	0.40	218.00	4,469.00	WO	HD	TR	_____
04/10/23	9180189	Review document requests and teleconference with D. Zaro regarding subpoena management and proposal to Court regarding same (0.4); review and respond to emails regarding same (0.2).	Del Castillo, Joshua	0.60	327.00	4,796.00	WO	HD	TR	_____
04/10/23	9181511	Research/analysis of FRCP 26 (c)(1)(B), related cases and approach to records, cost	Zaro, David	1.70	926.50	5,722.50	WO	HD	TR	_____

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		sharing as to discovery requests and possible strategy (.9). Draft memoranda to the Receiver to address the proposed approach to discovery, cost allocation and related issues (.8).								
04/10/23	9197054	Advise on issues relating to document management, production, potential repository and protective order covering same	Fates, Edward (Ted)	0.40	218.00	5,940.50	WO	HD	TR	_____
04/11/23	9180481	Review docket and relevant pleadings and prepare proposed language for inclusion in Receiver's interim report and transmit to Receiver and co-counsel for review and comment (0.9); attention to background summary for other interim report sections and confer with AM team regarding same (0.8).	Del Castillo, Joshua	1.70	926.50	6,867.00	WO	HD	TR	_____
04/11/23	9181470	Review emails from D. Zaro and K. Hendricks regarding discovery directed to Receiver (0.2); review subpoenas to Receiver (0.3); confer with M. Pham regarding documents produced to Receiver via Allen Matkins and document management procedures for same in connection with pending discovery demands (0.3); attention to issues regarding same (0.4).	Del Castillo, Joshua	1.20	654.00	7,521.00	WO	HD	TR	_____
04/11/23	9182571	Further analysis of issues concerning discovery strategy, coordination, cost shifting/sharing and email advice to Receiver and counsel, follow-up (.7). Calls with Receiver and counsel related to	Zaro, David	1.10	599.50	8,120.50	WO	HD	TR	_____

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		subpoenas, Receiver's response (.4).								
04/12/23	9182631	Review correspondence from Receiver, D. Zaro, and K. Hendricks regarding document demands to Receiver and proposed responses and procedures for same (0.3); confer with D. Zaro regarding same (0.3); review pleadings and proposed template protective order and analysis of issues presented by same (1.9).	Del Castillo, Joshua	2.50	1,362.50	9,483.00	WO	HD	TR	_____
04/12/23	9183586	Evaluate issues re: discovery, documents inventory, develop coordination for Receiver productions (.4). Meeting with Receiver counsel related to document inventory and follow-up (.3).	Zaro, David	0.70	381.50	9,864.50	WO	HD	TR	_____
04/13/23	9183263	Legal analysis of unique privilege and work product issue raised in recent discovery to Receiver and prepare for discussion with Receiver and GT co-counsel (2.7).	Del Castillo, Joshua	2.70	1,471.50	11,336.00	WO	HD	TR	_____
04/13/23	9186363	Evaluate discovery issues, prepare for/attend meeting with Receiver, Ms. Deering, Mr. Hall and counsel to address open/pending issues, advice as to strategy and approach (.9). Follow-up with counsel related to discovery response/motion (.2).	Zaro, David	1.10	599.50	11,935.50	WO	HD	TR	_____
04/14/23	9184405	Review and respond to correspondence regarding document subpoenas to Receiver from defendant counsel and GT co-counsel (0.5); emails with Receiver's office regarding same (0.4); emails with D. Zaro and attention to document management and anticipated production issues (0.7).	Del Castillo, Joshua	1.60	872.00	12,807.50	WO	HD	TR	_____

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04/14/23	9187574	Several emails/call concerning the records production/coordination and subpoena responses.	Zaro, David	0.40	218.00	13,025.50	WO	HD	TR	_____
04/18/23	9188027	Emails and teleconference with D. Zaro regarding document management and discovery response issues (0.7); review correspondence from K. Ewing and M. Pham regarding document production issues and prepare response and recommendation to M. Pham regarding same (0.4).	Del Castillo, Joshua	1.10	599.50	13,625.00	WO	HD	TR	_____
04/18/23	9191193	Attend meeting with Receiver ad Atherias related to subpoenas, responses, objections and procedural issues (.4).	Zaro, David	0.40	218.00	13,843.00	WO	HD	TR	_____
04/19/23	9189920	Review and respond to correspondence from GT counsel, M. Pham, and D. Zaro regarding document management and review matters and prospective responses to subpoenas to Receiver (0.7); confer with D. Zaro regarding same (0.3); review objection to Madsen subpoena and prepare notes (0.3).	Del Castillo, Joshua	1.30	708.50	14,551.50	WO	HD	TR	_____
04/19/23	9191321	Several emails and conferences with Receiver/counsel related to third party defendant/relief defendant discovery and objections, protective order (.4). Follow-up to the intervention issues and appeal (.2).	Zaro, David	0.60	327.00	14,878.50	WO	HD	TR	_____
04/20/23	9191392	Evaluate the objections to the Madsen discovery objections, evaluate the Madsen records and coordination of production (.5).	Zaro, David	1.30	708.50	15,587.00	WO	HD	TR	_____

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		Review client Receiver report, prepare for/attend meetings with Receiver, Mr. Hall, counsel and follow-up (.8).								
04/21/23	9192263	Review and respond to correspondence from GT and AM counsel regarding document management and production in response to subpoenas (0.6); legal analysis in connection with contemplated motion by Receiver for order governing discovery to Receiver and confer with D. Zaro regarding same (3.0).	Del Castillo, Joshua	3.60	1,962.00	17,549.00	WO	HD	TR	_____
04/24/23	9193063	Confer with M. Pham regarding pending discovery to Receiver and review and respond to emails regarding same (0.8).	Del Castillo, Joshua	0.80	436.00	17,985.00	WO	HD	TR	_____
04/24/23	9193306	Emails and confer with Receiver's office and co-counsel regarding interim report and attention to issues regarding same (1.0); complete legal analysis in connection with anticipated motion to establish discovery procedures and impose protective order (1.1); review co-counsel objection to document subpoena and confer with D. Zaro and M. Pham regarding same (0.5).	Del Castillo, Joshua	2.60	1,417.00	19,402.00	WO	HD	TR	_____
04/25/23	9194254	Review and respond to correspondence from local counsel and AM counsel regarding pending discovery to Receiver and related issues (0.5); legal analysis in connection with anticipated additional protective order and prepare update to receivership team regarding same (.7).	Del Castillo, Joshua	1.20	654.00	20,056.00	WO	HD	TR	_____

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04/26/23	9196125	Review and respond to correspondence from K. Ewing and M. Pham regarding Receiver responses to discovery and required notices under existing protective orders (0.6); additional legal analysis regarding presiding court's ability to enter protective order applying to all actions pending in district (0.8); revise outline for motion for protective order (0.5).	Del Castillo, Joshua	1.90	1,035.50	21,091.50	WO	HD	TR	_____
04/26/23	9204195	Work with counsel/emails concerning the subpoenas/Wells Fargo, proposed motion to address the Receiver processing of third party subpoenas, protective order.	Zaro, David	0.60	327.00	21,418.50	WO	HD	TR	_____
04/27/23	9197797	Confer with M. Pham regarding subpoena inquiry from J. Rickard (0.2); additional analysis for discovery procedures motion and continue drafting (1.1).	Del Castillo, Joshua	1.30	708.50	22,127.00	WO	HD	TR	_____
04/30/23	9201747	Review and respond to correspondence from counsel for Wells Fargo regarding document production issue (0.2); prepare follow-up inquiry to M. Pham regarding same (0.2); review notes regarding prior document turnover discussions with Wells (0.2).	Del Castillo, Joshua	0.60	327.00	22,454.00	WO	HD	TR	_____
05/01/23	9205262	Review and respond to correspondence regarding pending document subpoenas (0.5).	Del Castillo, Joshua	0.50	272.50	22,726.50	WO	HD	TR	_____
05/01/23	9234353	Prepare second subpoenas to US Bank and US Bancorp	Pham, Matt D.	0.40	178.00	22,904.50	WO	HD	TR	_____

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05/02/23	9234355	Review and analyze document production from Chase Bank and draft email to client regarding such production (0.3); Draft email to client regarding latest productions and next steps regarding Wells Fargo's production (0.2)	Pham, Matt D.	0.50	222.50	23,127.00	WO	HD	TR	_____
05/03/23	9207208	Additional legal analysis for motion for protective order and confer with counsel regarding same (1.3); continue preparation of motion (1.9); review sections of prior interim reports and confer with M. Pham regarding pending and additional anticipated discovery (0.7).	Del Castillo, Joshua	3.90	2,125.50	25,252.50	WO	HD	TR	_____
05/03/23	9221723	Analysis and determination of document productions in preparation for attorney review.	Peng, Simona	0.10	35.00	25,287.50	WO	HD	TR	_____
05/04/23	9208258	Emails with Receiver's office and M. Pham regarding follow-up document requests to banks (0.5); review notes from discussion with Receiver's accounting personnel regarding nature of materials sought and prepare draft inquiry to counsel for WF (0.6); review request from Receiver's office regarding discovery and document management and review, check document database, and confer with M. Pham regarding same (0.7).	Del Castillo, Joshua	1.80	981.00	26,268.50	WO	HD	TR	_____
05/04/23	9210837	Call/email with counsel to address the work to recover assets, accounting and prepare for meeting, review Receiver report (.4). Attend client meeting concerning status and work, legal issues as to ongoing discovery,	Zaro, David	0.80	436.00	26,704.50	WO	HD	TR	_____

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05/05/23	9209098	turnover and follow-up (.4). Teleconference with M. Pham and emails with Receiver's office regarding document management and accounting review matters (0.8); complete draft motion for protective order and deliver to D. Zaro for discussion (1.3); review SEC responses to discovery requests (0.2).	Del Castillo, Joshua	2.30	1,253.50	27,958.00	WO	HD	TR	_____
05/11/23	9214192	Email follow-up regarding draft motion for protective order (0.3); review subpoenas and prepare notes for discussion regarding same (0.7); revisions to draft motion (0.7).	Del Castillo, Joshua	1.70	926.50	28,884.50	WO	HD	TR	_____
05/11/23	9216779	Evaluate memorandum from Receiver/counsel and call/email with counsel related to legal issues/strategy (.8).	Zaro, David	0.80	436.00	29,320.50	WO	HD	TR	_____
05/12/23	9216226	Review and respond to correspondence from M. Pham and multiple bank counsel regarding outstanding subpoenas and associated document management issues (0.8).	Del Castillo, Joshua	0.80	436.00	29,756.50	WO	HD	TR	_____
05/15/23	9216478	Confer with D. Zaro regarding Receiver inquiry regarding discovery status and document management matters (0.4); follow-up responses to Receiver's office and co-counsel regarding same (0.5); revise sections of draft motion for protective order and deliver to Receiver for review and comment (0.9).	Del Castillo, Joshua	1.80	981.00	30,737.50	WO	HD	TR	_____
05/15/23	9218229	Revise draft motion for a protective order and follow-up (.8). Analysis of present	Zaro, David	2.30	1,253.50	31,991.00	WO	HD	TR	_____

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		discovery, the productions and evaluate strategy/coordinate coding/production and follow-up to prepare for meeting (.8). Attend meeting with Mr. Hall and Ms. Hendricks related to documents and discovery (.7).									
05/16/23	9217663	Review and respond to emails from and confer with M. Pham and counsel for U.S. Bank and WF regarding outstanding document subpoena issues (1.2); confer with M. Pham regarding outstanding B of A document request (0.2); review correspondence from defendants' counsel regarding objection to document subpoenas and follow-up email regarding same (0.2).	Del Castillo, Joshua	1.60	872.00	32,863.00	WO	HD	TR	_____	
05/17/23	9218809	Review turnover accounting provided by U.S. Bank and associated documents (1.0); confer with M. Pham regarding complete turnover accounting and recommend requests to Receiver's office regarding same (0.6).	Del Castillo, Joshua	1.60	872.00	33,735.00	WO	HD	TR	_____	
05/18/23	9220371	Emails and teleconferences with Receiver's office and AM counsel regarding accounting matters (0.7).	Del Castillo, Joshua	0.70	381.50	34,116.50	WO	HD	TR	_____	
05/19/23	9221508	Review and respond to emails from GT co-counsel, bank counsel, and Receiver's office regarding pending document management and subpoena issues (0.6); follow-up emails regarding and revise draft motion for protective order (1.1).	Del Castillo, Joshua	1.70	926.50	35,043.00	WO	HD	TR	_____	

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05/22/23	9223412	Emails and teleconferences with M. Pham regarding pending subpoenas and discovery to the Receiver (0.8); review materials in connection with same (0.5); attention to document management issues (0.5).	Del Castillo, Joshua	1.80	981.00	36,024.00	WO	HD	TR	_____
05/23/23	9225658	Call with counsel concerning the subpoenas and enforcement approach, motion to establish the protocol (.4). Email related to FBT turnover, the privilege and follow-up response (.4).	Zaro, David	0.80	436.00	36,460.00	WO	HD	TR	_____
05/25/23	9227245	Emails with D. Zaro and Receiver's office regarding motion for protective order and follow-up regarding same (0.5); prepare revisions to same (0.5); follow-up with local counsel regarding outstanding subpoenas (0.4).	Del Castillo, Joshua	1.40	763.00	37,223.00	WO	HD	TR	_____
05/25/23	9230943	Prepare for/attend meeting with Receiver, Mr Hall, Ms. Hendricks concerning accounting/taxes and status of recovery, disposition of assets (.4). Follow-up with Receiver counsel to address work on omnibus protective order, motion (.4).	Zaro, David	0.80	436.00	37,659.00	WO	HD	TR	_____
05/26/23	9230160	Review and respond to correspondence from counsel regarding document management and subpoena issues and prepare follow-up inquiries to M. Pham regarding same (0.7); review summary of pending subpoenas (0.2); emails to GT counsel regarding same (0.2).	Del Castillo, Joshua	1.10	599.50	38,258.50	WO	HD	TR	_____

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05/31/23	9235562	Review and respond to correspondence from counsel for Wells Fargo regarding outstanding document subpoena and anticipated production regarding same (0.4); confer with M. Pham regarding same (0.3); follow-up emails to co-counsel and Receiver's office regarding draft motion for protective order (0.5); confer with J. Robichaud regarding anticipated additional subpoenas (0.5).	Del Castillo, Joshua	1.70	926.50	39,185.00	WO	HD	TR	_____
06/01/23	9240544	Evaluate the Receiver/Mr. Hall's accounting, the email and assess/analyze the impact on discovery and potential recoveries (.4). Prepare for/attend the meeting with Receiver, follow-up with Receiver counsel (.5).	Zaro, David	0.90	490.50	39,675.50	WO	HD	TR	_____
06/05/23	9240135	Prepare for and teleconference with D. Zaro regarding pending discovery and accounting issues (0.3); follow-up emails regarding same (0.3); emails with bank counsel regarding outstanding subpoenas and document turnover issues (0.6); legal analysis of issue raised by counsel (1.1).	Del Castillo, Joshua	2.30	1,253.50	40,929.00	WO	HD	TR	_____
06/05/23	9242590	Email communication and call with Receiver counsel related to SEC emails re: discovery and production of records (.4). Call/emails with Receiver counsel concerning the SEC discovery, Receiver's accounting and foundation re: bank records as to individual relief defendants (.5).	Zaro, David	0.90	490.50	41,419.50	WO	HD	TR	_____
06/06/23	9241323	Follow-up with Receiver's office regarding motion for protective order and attention to	Del Castillo, Joshua	0.60	327.00	41,746.50	WO	HD	TR	_____

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		issues regarding same (0.6).								
06/06/23	9268379	Draft email to the Receiver's special litigation counsel regarding stipulated protective order as to US Bank/US Bancorp	Pham, Matt D.	0.20	89.00	41,835.50	WO	HD	TR	_____
06/07/23	9242593	Confer with M. Pham regarding pending document requests and productions (0.5); review correspondence from Receiver's office regarding same (0.3).	Del Castillo, Joshua	0.80	436.00	42,271.50	WO	HD	TR	_____
06/08/23	9246514	Evaluate the email/letter from Receiver related to Libertas/lender (.4). Assess the UCC issues, the issues regarding investors and emails advising the Receiver and counsel as to response (.6). Review Receiver's memorandum and then attend meeting with Receiver/Mr. Hall and counsel related to pending legal issues, accounting, and recovery (.5).	Zaro, David	1.50	817.50	43,089.00	WO	HD	TR	_____
06/09/23	9244538	Review correspondence from SEC regarding pending document productions (0.2); attention to document management and discovery issues (0.7); confer with M. Pham and prepare notes for discussion with J. Hammerman regarding Receiver's anticipated production of materials subject to protective order (0.5).	Del Castillo, Joshua	1.40	763.00	43,852.00	WO	HD	TR	_____
06/12/23	9246467	Emails and teleconference with J. Hammerman regarding US Bank questions regarding Receiver's production to Wells (0.6); review protective order and confer with AM counsel regarding implications of same (0.6); email inquiry to special litigation	Del Castillo, Joshua	1.40	763.00	44,615.00	WO	HD	TR	_____

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06/14/23	9248672	counsel (0.2). Follow-up emails and teleconferences with litigation special counsel regarding inquiry from U.S. Bank (0.7); emails to U.S. Bank counsel regarding document production inquiry (0.3); emails with M. Pham regarding document productions and management (0.3).	Del Castillo, Joshua	1.30	708.50	45,323.50	WO	HD	TR	_____
06/15/23	9249831	Review docket and notes regarding class action in connection with inquiry from U.S. Bank counsel regarding protective order and potential Receiver production of documents (0.6); teleconference with M. Diaz-Cortez regarding class and Wells Fargo protective orders and follow-up email regarding same (0.3); review materials provided by M. Diaz-Cortez (0.5).	Del Castillo, Joshua	1.40	763.00	46,086.50	WO	HD	TR	_____
06/15/23	9254774	Prepare for/attend the meeting with Receiver and accounting, asset recovery team, address pending issues (.4). Emails concerning discovery, coordination among counsel, pending requests and follow-up (.3).	Zaro, David	0.70	381.50	46,468.00	WO	HD	TR	_____
06/16/23	9251125	Follow-up correspondence to bank counsel regarding anticipated document production (0.6); review additional materials transmitted by special counsel (0.4); transmit draft motion to co-counsel for review and confer regarding same (0.6).	Del Castillo, Joshua	1.60	872.00	47,340.00	WO	HD	TR	_____
06/16/23	9254831	Several emails and call with counsel to address the discovery, document issues	Zaro, David	0.40	218.00	47,558.00	WO	HD	TR	_____

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		related to Wells Fargo action, SEC docs, FBI production and follow-up.								
06/19/23	9253273	Emails with D. Zaro and K. Hendricks regarding subpoenas to Receiver and draft motion for protective order (0.5); review notes regarding same (0.5).	Del Castillo, Joshua	1.00	545.00	48,103.00	WO	HD	TR	_____
06/19/23	9257193	Analysis of Receiver's approach to Wells Fargo discovery including evaluate stipulation as to WF document requests and Receiver's response, review of protective orders for US Bank, Eco Battery and Wells Fargo, related emails (1.4). Emails concerning the Receiver draft motion regarding discovery (.3).	Zaro, David	1.70	926.50	49,029.50	WO	HD	TR	_____
06/20/23	9253293	Emails with D. Zaro and K. Hendricks regarding document production issues (0.8); teleconfereneecs with D. Zaro regarding same (0.5); follow-up with M. Pham regarding U.S. Bank production inquiry and email to U.S. Bank counsel (0.7); review and respond to document production-related correspondence from special litigation counsel (0.5).	Del Castillo, Joshua	2.50	1,362.50	50,392.00	WO	HD	TR	_____
06/20/23	9257299	Work on the discovery issues, evaluate the related litigation, stipulation, protective orders, and analysis as to coordination among cases (.9). Attend meeting with Receiver, litigation counsel to address discovery issues, motion, stipulation and strategy (.5) Follow-up on meeting to address draft motion and approach to pending discovery (.3).	Zaro, David	1.70	926.50	51,318.50	WO	HD	TR	_____

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Fees for Matter 392775.00004.(Investigation & Reporting)

Trans Date	Index	Description of Service Rendered	Timekeeper	Hours	Fees	Sum	Circle Action			
06/21/23	9254924	Follow-up emails to co-counsel regarding document production issues (0.4); follow-up emails to lender counsel regarding document production issues (0.3); teleconference regarding lender inquiry regarding same (0.5); prepare revisions to draft motion for protective order in accordance with co-counsel recommendations and circulate for discussion (0.9).	Del Castillo, Joshua	2.10	1,144.50	52,463.00	WO	HD	TR	_____
06/23/23	9256642	Review and respond to correspondence from U.S. Bank and Wells Fargo counsel regarding anticipated production by Receiver and outstanding document requests from Receiver (0.6); confer with AM counsel regarding same (0.2); prepare for and teleconference with counsel for U.S. Bank (0.5); follow-up correspondence to and with Receiver's special litigation counsel (0.5).	Del Castillo, Joshua	1.80	981.00	53,444.00	WO	HD	TR	_____
06/23/23	9260155	Evaluate issues concerning the US Bank objections, address Receiver and special litigation counsel subpoenas/protective orders and email with counsel (.6). Follow-up with Receiver counsel related to discovery motions and coordination (.3).	Zaro, David	0.90	490.50	53,934.50	WO	HD	TR	_____
06/26/23	9263185	Follow-up on the US Bank discovery issues, documents, Receiver's draft motion for protective order (.4). Call with counsel concerning US Bank and coordination with counsel as to discovery (.3).	Zaro, David	0.70	381.50	54,316.00	WO	HD	TR	_____

08/14/23 10:18:12 PROFORMA STATEMENT FOR MATTER 392775.00004 (Winkler, Geoff - Receiver for J&J Consul) (Investigation & Reporting)

Fees for Matter 392775.00004.(Investigation & Reporting)

Trans Date	Index	Description of Service Rendered	Timekeeper	Hours	Fees	Sum	Circle	Action
06/28/23	9263154	Analysis of further issues related to discovery/production and then revise motion for protective order, follow-up (1.4). Email with Receiver counsel related to discovery (.3).	Zaro, David	1.70	926.50	55,242.50	WO	HD TR

Proforma Summary

Timekeeper

Number	Timekeeper	Hours	Rate	Amounts
000313	Zaro, David	27.50	545.00	14,987.50
001665	Fates, Edward (Ted)	0.40	545.00	218.00
001842	Del Castillo, Joshua	72.50	545.00	39,512.50
002307	Peng, Simona	0.10	350.00	35.00
002510	Pham, Matt D.	1.10	445.00	489.50
				\$55,242.50
Subtotal Fees				\$55,242.50
Discount				0.00
Total Fees				55,242.50
Total Disbursements				0.00

Attorney Billing Instructions

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

Billing Instructions

expires 6/30/2024: Partners @ 545; Assoc @ 445; Paralegals @ 350

Account Summary – As Of 08/01/23

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

08/14/23 10:18:12 PROFORMA STATEMENT FOR MATTER 392775.00004 (Winkler, Geoff - Receiver for J&J Consul) (Investigation & Reporting)

Worked	11,900.00	11,900.00	0.00	108,639.50	108,639.50	0.00	201,296.50	201,296.50	0.00
Unbilled Adj	0.00	0.00	0.00	381.50	381.50	0.00	3,383.00	3,383.00	0.00
Billed	0.00	0.00	0.00	78,279.00	78,279.00	0.00	129,136.00	129,136.00	0.00
Collected	0.00	0.00	0.00	78,279.00	78,279.00	0.00	129,136.00	129,136.00	0.00
AR Write Off	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00
	Total	Fees	Costs						
WIP Balance	68,777.50	68,777.50	0.00						
AR Balance	0.00	0.00	0.00						
Unalloc Payment	0.00								
Client Trust Balance	0.00								

Billing Address

Winkler, Geoff - Receiver for J&J Consulting Services, Inc.; J and J Purchasing
 LLC; The Judd Irrevocable Trust; BJ Holdings LLC
 Geoff B. Winkler
 American Fiduciary Services LLC
 715 NW Hoyt Street, Suite 4364
 Portland, OR 97208

08/14/23 10:18:14 PROFORMA STATEMENT FOR MATTER 392775.00006 (Winkler, Geoff - Receiver for J&J Consul) (Sale, Disposition & Transfer of Assets)

Preliminary Billing FormBilling Atty: 001842 - Del Castillo,
Joshua

Matter #: 392775.00006

Client Name: Winkler, Geoff - Receiver for J&J Consul

Date of Last Billing: 06/30/23

Matter Name: Sale, Disposition & Transfer of Assets

Proforma Number: 1229974

Client/Matter Joint Group # 392775.1

Client Matter Number:

Fees for Matter 392775.00006.(Sale, Disposition & Transfer of Assets)

Trans Date	Index	Description of Service Rendered	Timekeeper	Hours	Fees	Sum	Circle	Action		
04/04/23	9175698	Review title documents and prepare updates to receivership team regarding anticipated real property sale issues (0.8); legal analysis of title priority inquiry (0.5).	Del Castillo, Joshua	1.30	708.50	708.50	WO	HD	TR	_____
04/28/23	9199423	Legal analysis of issues arising in connection with frozen real property assets with indirect beneficial ownership and prepare outline for discussion with Receiver and counsel (3.7).	Del Castillo, Joshua	3.70	2,016.50	2,725.00	WO	HD	TR	_____
04/30/23	9201815	Review notes and emails regarding Judd Huntington Beach property and prepare inquiries to U.S. Bank and Receiver's office regarding same (1.0).	Del Castillo, Joshua	1.00	545.00	3,270.00	WO	HD	TR	_____
05/04/23	9208109	Follow-up emails and teleconferences with banks and title regarding anticipated sales of receivership properties (1.1).	Del Castillo, Joshua	1.10	599.50	3,869.50	WO	HD	TR	_____
05/22/23	9223474	Review email and documents forwarded by J. McGraw in connection with anticipated real property sale and correspondence with D. Zaro regarding same (1.0);	Del Castillo, Joshua	1.30	708.50	4,578.00	WO	HD	TR	_____

08/14/23 10:18:14 PROFORMA STATEMENT FOR MATTER 392775.00006 (Winkler, Geoff - Receiver for J&J Consul) (Sale, Disposition & Transfer of Assets)

Fees for Matter 392775.00006.(Sale, Disposition & Transfer of Assets)

Trans Date	Index	Description of Service Rendered	Timekeeper	Hours	Fees	Sum	Circle Action			
		teleconference with D. Zaro regarding same (0.3).								
05/23/23	9224609	Legal analysis of novel issue presented in connection with prospective real property sale (2.3); prepare draft stipulation for Abbey Hill sale and transmit to Receiver's office for review (0.6).	Del Castillo, Joshua	2.90	1,580.50	6,158.50	WO	HD	TR	_____
05/25/23	9227071	Additional legal analysis in connection with pending and anticipated real property sales (1.1); review lien release and related documents on Judd CA property (0.5); review and respond to correspondence from J. McGraw and D. Zaro regarding pending Nevada real property sale and associated stipulation (0.5).	Del Castillo, Joshua	2.10	1,144.50	7,303.00	WO	HD	TR	_____
06/01/23	9238270	Review documents provided by U.S. Bank in connection with Judd property in California in anticipation of eventual sale and prepare inquiry and update regarding same (0.6).	Del Castillo, Joshua	0.60	327.00	7,630.00	WO	HD	TR	_____
06/07/23	9242716	Follow-up inquiry to Receiver's office regarding status of Judd Huntington Beach property and anticipated sale of same (0.2); review correspondence from J. Hammerman regarding same (0.2).	Del Castillo, Joshua	0.40	218.00	7,848.00	WO	HD	TR	_____
06/14/23	9248950	Correspondence with AM counsel regarding Judd Huntington Beach property (0.3); review title materials (0.3); prepare inquiry to Receiver's office (0.2).	Del Castillo, Joshua	0.80	436.00	8,284.00	WO	HD	TR	_____

08/14/23 10:18:14 PROFORMA STATEMENT FOR MATTER 392775.00006 (Winkler, Geoff - Receiver for J&J Consul) (Sale, Disposition & Transfer of Assets)

Fees for Matter 392775.00006.(Sale, Disposition & Transfer of Assets)

Trans Date	Index	Description of Service Rendered	Timekeeper	Hours	Fees	Sum	Circle	Action		
06/22/23	9258954	Email with counsel and Mr. McGraw, follow-up conference related to sale/stipulation related to sale/stipulation related to Hurricane property.	Zaro, David	0.30	163.50	8,447.50	WO	HD	TR	_____
06/23/23	9255970	Review correspondence from Receiver's office, Hurricane RPA and other purchase agreement documents, and prepare draft stipulation and order for sale of property (1.6).	Del Castillo, Joshua	1.60	872.00	9,319.50	WO	HD	TR	_____
06/27/23	9260671	Emails with J. McGraw regarding prospective real property sales and stipulations (0.2); review materials transmitted by J. McGraw regarding same (0.8).	Del Castillo, Joshua	1.00	545.00	9,864.50	WO	HD	TR	_____
06/27/23	9263208	Evaluate the issues concerning the stipulations, the Rockstream and 9 Sky Arc, review emails, documents and call with Receiver counsel.	Zaro, David	0.70	381.50	10,246.00	WO	HD	TR	_____
06/28/23	9261508	Review documents, attend to matters associated with contemplated real property sales, and prepare draft stipulations associated with same (3.0); emails to Receiver's office regarding same (0.4).	Del Castillo, Joshua	3.40	1,853.00	12,099.00	WO	HD	TR	_____
06/30/23	9264638	Review sale order and attention to updated sale stipulations (0.3).	Del Castillo, Joshua	0.30	163.50	12,262.50	WO	HD	TR	_____

Proforma Summary

Timekeeper Number	Timekeeper	Hours	Rate	Amounts
000313	Zaro, David	1.00	545.00	545.00

08/14/23 10:18:14 PROFORMA STATEMENT FOR MATTER 392775.00006 (Winkler, Geoff - Receiver for J&J Consul) (Sale, Disposition & Transfer of Assets)

Proforma Summary

Timekeeper

Number	Timekeeper	Hours	Rate	Amounts
001842	Del Castillo, Joshua	21.50	545.00	11,717.50
		22.50		\$12,262.50
Subtotal Fees				\$12,262.50
Discount				0.00
Total Fees				12,262.50
Total Disbursements				0.00

Attorney Billing Instructions

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

Billing Instructions

expires 6/30/2024: Partners @ 545; Assoc @ 445; Paralegals @ 350

Account Summary – As Of 08/01/23

	Fiscal YTD			Calendar YTD			LTD		
	Total	Fees	Disb.	Total	Fees	Disb.	Total	Fees	Disbursements
Worked	713.00	713.00	0.00	46,048.50	46,048.50	0.00	151,395.50	151,395.50	0.00
Unbilled Adj	0.00	0.00	0.00	0.00	0.00	0.00	782.30	780.80	1.50
Billed	0.00	0.00	0.00	82,369.20	82,369.20	0.00	137,639.20	137,639.20	0.00
Collected	0.00	0.00	0.00	82,369.20	82,369.20	0.00	137,639.20	137,639.20	0.00
AR Write Off	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00
WIP	12,975.50	12,975.50	0.00						
Balance									
AR Balance	0.00	0.00	0.00						
Unalloc	0.00								
Payment									
Client Trust	0.00								
Balance									

08/14/23 10:18:14 PROFORMA STATEMENT FOR MATTER 392775.00006 (Winkler, Geoff - Receiver for J&J Consul) (Sale, Disposition & Transfer of Assets)

Billing Address

Winkler, Geoff - Receiver for J&J Consulting Services, Inc.; J and J Purchasing
LLC; The Judd Irrevocable Trust; BJ Holdings LLC
Geoff B. Winkler
American Fiduciary Services LLC
715 NW Hoyt Street, Suite 4364
Portland, OR 97208

08/14/23 10:18:15 PROFORMA STATEMENT FOR MATTER 392775.00009 (Winkler, Geoff - Receiver for J&J Consul) (Third Party Claims & Recoveries)

Preliminary Billing FormBilling Atty: 001842 - Del Castillo,
Joshua

Matter #: 392775.00009

Client Name: Winkler, Geoff - Receiver for J&J Consul

Date of Last Billing: 06/30/23

Matter Name: Third Party Claims & Recoveries

Proforma Number: 1229974

Client/Matter Joint Group # 392775.1

Client Matter Number:

Fees for Matter 392775.00009.(Third Party Claims & Recoveries)

Trans Date	Index	Description of Service Rendered	Timekeeper	Hours	Fees	Sum	Circle Action			
							WO	HD	TR	
05/02/23	9206290	Legal analysis regarding district court order establishing discovery procedures may be binding in cases before other judges in the same district (2.0).	Robichaud, James	2.00	890.00	890.00	WO	HD	TR	_____
05/02/23	9206364	Document review relating to prospective alter ego claim with respect to ecobattery and ecocapital (1.1).	Robichaud, James	1.10	489.50	1,379.50	WO	HD	TR	_____
05/04/23	9208207	Document review relating to prospective alter ego claim (1.4).	Robichaud, James	1.40	623.00	2,002.50	WO	HD	TR	_____
05/05/23	9209255	Continue doc review of Ecobattery production with respect to prospective alter ego claims (1.8).	Robichaud, James	1.80	801.00	2,803.50	WO	HD	TR	_____
05/05/23	9210845	Evaluate the draft of the complaint, assess the allegations/foundation (.6).	Zaro, David	0.60	327.00	3,130.50	WO	HD	TR	_____
05/08/23	9210782	Document review relating to potential alter ego claim (2.1).	Robichaud, James	2.10	934.50	4,065.00	WO	HD	TR	_____
05/09/23	9211798	Document review relating to potential alter ego claim (1.8).	Robichaud, James	1.80	801.00	4,866.00	WO	HD	TR	_____

08/14/23 10:18:15 PROFORMA STATEMENT FOR MATTER 392775.00009 (Winkler, Geoff - Receiver for J&J Consul) (Third Party Claims & Recoveries)

Fees for Matter 392775.00009.(Third Party Claims & Recoveries)

Trans Date	Index	Description of Service Rendered	Timekeeper	Hours	Fees	Sum	Circle Action			
06/02/23	9239183	Finalize Eco Battery document review with respect to prospective alter ego claim (2.1).	Robichaud, James	2.10	934.50	5,800.50	WO	HD	TR	_____
06/05/23	9241383	Complete review of text message communications produced in connection with prospective Ecobattery & Ecocapital litigation (1.5).	Robichaud, James	1.50	667.50	6,468.00	WO	HD	TR	_____
06/07/23	9242713	Follow-up emails with D. Zaro and M. Pham regarding prospective third party claims and review draft materials provided by M. Pham in connection with same (0.7).	Del Castillo, Joshua	0.70	381.50	6,849.50	WO	HD	TR	_____
06/15/23	9249829	Confer with M. Pham and J. Robichaud regarding outstanding Eco Battery issues (0.5).	Del Castillo, Joshua	0.50	272.50	7,122.00	WO	HD	TR	_____
06/27/23	9260190	Teleconference with D. Zaro regarding legal standard for establishing certain receiver claims against third parties (0.2); legal analysis in connection with prospective claims (2.2); follow-up to D. Zaro and Receiver (0.2).	Del Castillo, Joshua	2.60	1,417.00	8,539.00	WO	HD	TR	_____
06/27/23	9261040	Telephone conference and analysis re: third party recovery issues and strategy.	Farrell, Michael	0.40	218.00	8,757.00	WO	HD	TR	_____

Proforma Summary**Timekeeper**

Number	Timekeeper	Hours	Rate	Amounts
000313	Zaro, David	0.60	545.00	327.00
000739	Farrell, Michael	0.40	545.00	218.00
001842	Del Castillo, Joshua	3.80	545.00	2,071.00

08/14/23 10:18:15 PROFORMA STATEMENT FOR MATTER 392775.00009 (Winkler, Geoff - Receiver for J&J Consul) (Third Party Claims & Recoveries)

Proforma Summary

Timekeeper

Number	Timekeeper	Hours	Rate	Amounts
002592	Robichaud, James	13.80	445.00	6,141.00
		18.60		\$8,757.00
Subtotal Fees				\$8,757.00
Discount				0.00
Total Fees				8,757.00
Total Disbursements				0.00

Attorney Billing Instructions

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

Billing Instructions

expires 6/30/2024: Partners @ 545; Assoc @ 445; Paralegals @ 350

Account Summary – As Of 08/01/23

	Fiscal YTD			Calendar YTD			LTD		
	Total	Fees	Disb.	Total	Fees	Disb.	Total	Fees	Disbursements
Worked	1,030.00	1,030.00	0.00	37,735.50	37,735.50	0.00	87,766.50	87,766.50	0.00
Unbilled Adj	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00
Billed	0.00	0.00	0.00	68,779.00	68,779.00	0.00	77,935.00	77,935.00	0.00
Collected	0.00	0.00	0.00	68,779.00	68,779.00	0.00	77,935.00	77,935.00	0.00
AR Write Off	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00
WIP	9,831.50	9,831.50	0.00						
Balance									
AR Balance	0.00	0.00	0.00						
Unalloc	0.00								
Payment									
Client Trust	0.00								
Balance									

08/14/23 10:18:15 PROFORMA STATEMENT FOR MATTER 392775.00009 (Winkler, Geoff - Receiver for J&J Consul) (Third Party Claims & Recoveries)

Billing Address

Winkler, Geoff - Receiver for J&J Consulting Services, Inc.; J and J Purchasing
LLC; The Judd Irrevocable Trust; BJ Holdings LLC
Geoff B. Winkler
American Fiduciary Services LLC
715 NW Hoyt Street, Suite 4364
Portland, OR 97208

EXHIBIT 2

EXHIBIT 2

Statement

LAWRENCE J SEMENZA, III, P.C.
 dba SEMENZA KIRCHER RICKARD
 10161 Park Run Drive, Suite 150
 Las Vegas, Nevada 89145
 Telephone: (702) 835-6803
 Facsimile: (702) 920-8669

Date: 5/20/2023

American Financial Services
 c/o Geoff Winkler
 2300 West Sahara Avenue, Suite 822
 Las Vegas, NV 89102
 Receiver for J&J Consulting Services, Inc

Open Invoices Now Due \$16,154.30

Date	Open Invoice	Balance Remaining	Total Due
	7092-01 Receiver in Nevada Actions-		
07/11/2022	INV #7092-01_01. Orig. Amount \$7,006.50.	951.30	951.30
08/30/2022	INV #7092-01_02. Orig. Amount \$5,744.50.	1,148.90	2,100.20
09/30/2022	INV #7092-01_03. Orig. Amount \$4,357.50.	833.90	2,934.10
10/09/2022	INV #7092-01_04. Orig. Amount \$2,555.50.	511.10	3,445.20
11/29/2022	INV #7092-01_05. Orig. Amount \$1,960.86.	419.96	3,865.16
12/28/2022	INV #7092-01_06. Orig. Amount \$4,709.60.	1,097.84	4,963.00
01/07/2023	INV #7092-01_07. Orig. Amount \$1,931.50.	386.30	5,349.30
02/28/2023	INV #7092-01_08. Orig. Amount \$2,249.00.	2,249.00	7,598.30
03/29/2023	INV #7092-01_09. Orig. Amount \$1,946.00.	1,946.00	9,544.30
04/06/2023	INV #7092-01_10. Orig. Amount \$3,588.50.	3,588.50	13,132.80
05/16/2023	INV #7092-01_11. Orig. Amount \$3,021.50.	3,021.50	16,154.30

LAWRENCE J SEMENZA, III, P.C.
 dba SEMENZA KIRCHER RICKARD
 10161 Park Run Drive, Suite 150

American Financial Services
 c/o Geoff Winkler
 2300 West Sahara Avenue, Suite 822
 Las Vegas, NV 89102
 Receiver for J&J Consulting Services, Inc

Las Vegas, Nevada 89145
 Telephone: (702) 835-6803
 Facsimile: (702) 920-8669
 Federal I.D. # 27-4465751

Date 5/16/2023
 Invoice Number 7092-01_11
 Client Number 7092
 Matter Number 01

RE: Receiver in Nevada Actions

BILL THROUGH DATE 4/30/2023

Date	Employee	Description	Hours	Rate	Amount
		PROFESSIONAL FEES			
4/6/2023	J Rickard	Continued work on documents for disclosure	0.5	375.00	187.50
4/10/2023	O Kelly	Review e-mail from client to K Mindlin re Western Alliance Bank information/documents Beasley	0.1	145.00	14.50
4/11/2023	O Kelly	Review e-mail from K Mindlin re Western Alliance Bank information/documents Beasley	0.1	145.00	14.50
4/11/2023	J Rickard	Conference call regarding Wells Fargo subpoena to Receiver; review emailing regarding same	0.6	375.00	225.00
4/11/2023	J Rickard	Review Wells Fargo response to follow up questions regarding response to subpoena	0.2	375.00	75.00
4/17/2023	O Kelly	E-mail to Legal Wings re status of affidavit of service of subpoena on Wells Fargo Bank (22-cv-00612)	0.1	145.00	14.50
4/17/2023	J Rickard	Attorney conference call regarding Wells Fargo confidentiality designations; prepare for same	0.7	375.00	262.50
4/18/2023	O Kelly	E-mails with Legal Wings re status of affidavit of service of subpoena on Wells Fargo Bank (0.1) ; review e-mails between J Rickard/client re subpoena response documents from Wells Fargo (0.2); review proof of service of subpoena on Wells Fargo Bank (0.1); review objection to Wells Fargo subpoena (0.1) (22-cv-00612)	0.5	145.00	72.50
4/18/2023	J Rickard	Emailing regarding subpoena to Wells Fargo and response	0.3	375.00	112.50
4/19/2023	O Kelly	Review e-mails between J Rickard/M Diaz-Cortes re telephonic meeting re Wells Fargo objection to subpoena; review e-mail from J Rickard to counsel for Wells Fargo re subpoena	0.2	145.00	29.00
4/19/2023	J Rickard	Attorney conference call regarding Wells Fargo documents	0.4	375.00	150.00
4/24/2023	O Kelly	Review e-mails between client/J Rickard re upcoming hearing (0.1) (22-cv-00612); e-mails with D Saavedra re hearing information to be sent to counsel (0.2) (22-cv-00612); review Legal Wings invoice for service of Wells Fargo subpoena (0.1) (22-cv-00612); review e-mail from J Rickard to counsel for Wells Fargo re documents (0.1) (22-cv-00612)	0.5	145.00	72.50
4/24/2023	J Rickard	Review objections to Wells Fargo subpoena from class action; follow up with counsel for Wells Fargo regarding scheduling meet and confer	0.5	375.00	187.50
4/25/2023	O Kelly	Work on formatting objections to Wells Fargo subpoena (0.4) (2:22-cv-00529-GMN-NJK); calendar meet and confer with counsel re Wells Fargo objections (0.1) (22-cv-00612); send out objections to Wells Fargo subpoena (0.6) (2:22-cv-00529-GMN-NJK)	1.1	145.00	159.50
4/25/2023	J Rickard	Emailing regarding Wells Fargo meet and confer	0.2	375.00	75.00
4/26/2023	J Rickard	Prepare for status check hearing (.5); attend status check hearing (.7); attorney meeting to discuss Wells Fargo subpoenas (.3); review order denying objection to order permitting special litigation counsel (.2); emailing Wells Fargo counsel regarding meet and confer (.2)	1.9	375.00	712.50
4/27/2023	J Rickard	Prepare for and participate in counsel call in anticipation of meet and confer with Wells Fargo counsel; emailing and phone calls regarding U.S Bank protective order	0.8	375.00	300.00
4/28/2023	O Kelly	Review minute order re status hearing (0.1)(22-cv-00612)	0.1	145.00	14.50

Total Current Invoice

LAWRENCE J SEMENZA, III, P.C.
 dba SEMENZA KIRCHER RICKARD
 10161 Park Run Drive, Suite 150
 Las Vegas, Nevada 89145
 Telephone: (702) 835-6803
 Facsimile: (702) 920-8669
 Federal I.D. # 27-4465751

Date 5/16/2023
 Invoice Number 7092-01_11
 Client Number 7092
 Matter Number 01

American Financial Services
 c/o Geoff Winkler
 2300 West Sahara Avenue, Suite 822
 Las Vegas, NV 89102
 Receiver for J&J Consulting Services, Inc
 RE: Receiver in Nevada Actions

BILL THROUGH DATE 4/30/2023

Date	Employee	Description	Hours	Rate	Amount
4/28/2023	J Rickard	Participate in counsel meet and confer with counsel for Wells Fargo regarding opposing subpoenas and protective order (.5); review correspondence regarding same (.2)	0.7	375.00	262.50
		Subtotal			2,941.50
		EXPENSES/COSTS			
4/17/2023		Legal Wings Invoice P-1982162		80.00	80.00
		Subtotal			80.00

Total Current Invoice \$3,021.50

Statement

LAWRENCE J SEMENZA, III, P.C.
 dba SEMENZA KIRCHER RICKARD
 10161 Park Run Drive, Suite 150
 Las Vegas, Nevada 89145
 Telephone: (702) 835-6803
 Facsimile: (702) 920-8669

Date: 6/29/2023

American Financial Services
 c/o Geoff Winkler
 2300 West Sahara Avenue, Suite 822
 Las Vegas, NV 89102
 Receiver for J&J Consulting Services, Inc

Open Invoices Now Due \$19,718.30

Date	Open Invoice	Balance Remaining	Total Due
	7092-01 Receiver in Nevada Actions-		
07/11/2022	INV #7092-01_01. Orig. Amount \$7,006.50.	951.30	951.30
08/30/2022	INV #7092-01_02. Orig. Amount \$5,744.50.	1,148.90	2,100.20
09/30/2022	INV #7092-01_03. Orig. Amount \$4,357.50.	833.90	2,934.10
10/09/2022	INV #7092-01_04. Orig. Amount \$2,555.50.	511.10	3,445.20
11/29/2022	INV #7092-01_05. Orig. Amount \$1,960.86.	419.96	3,865.16
12/28/2022	INV #7092-01_06. Orig. Amount \$4,709.60.	1,097.84	4,963.00
01/07/2023	INV #7092-01_07. Orig. Amount \$1,931.50.	386.30	5,349.30
02/28/2023	INV #7092-01_08. Orig. Amount \$2,249.00.	2,249.00	7,598.30
03/29/2023	INV #7092-01_09. Orig. Amount \$1,946.00.	1,946.00	9,544.30
04/06/2023	INV #7092-01_10. Orig. Amount \$3,588.50.	3,588.50	13,132.80
05/16/2023	INV #7092-01_11. Orig. Amount \$3,021.50.	3,021.50	16,154.30
06/26/2023	INV #7092-01_12. Orig. Amount \$3,564.00.	3,564.00	19,718.30

LAWRENCE J SEMENZA, III, P.C.
 dba SEMENZA KIRCHER RICKARD
 10161 Park Run Drive, Suite 150

American Financial Services
 c/o Geoff Winkler
 2300 West Sahara Avenue, Suite 822
 Las Vegas, NV 89102
 Receiver for J&J Consulting Services, Inc

Las Vegas, Nevada 89145
 Telephone: (702) 835-6803
 Facsimile: (702) 920-8669
 Federal I.D. # 27-4465751

Date 6/26/2023
 Invoice Number 7092-01_12
 Client Number 7092
 Matter Number 01

RE: Receiver in Nevada Actions

BILL THROUGH DATE 5/31/2023

Date	Employee	Description	Hours	Rate	Amount
		PROFESSIONAL FEES			
5/1/2023	J Rickard	E-mail regarding U.S Bank response to notification of Wells Fargo subpoena	0.2	375.00	75.00
5/2/2023	J Rickard	Review e-mail regarding coordination of discovery between class action and Wells Fargo action	0.1	375.00	37.50
5/3/2023	O Kelly	Work with J Rickard re new Wells Fargo complaint; format same	0.6	145.00	87.00
5/3/2023	J Rickard	Reviewing draft complaint against Wells Fargo	0.7	375.00	262.50
5/4/2023	O Kelly	Continue to work on complaint against Wells Fargo Bank, summons and cover sheet; with M Diaz-Cortez/J Rickard; file same (23-cv-00703 - Wells Fargo Bank case)	2.6	145.00	377.00
5/4/2023	J Rickard	Additional reviewing for draft complaint against Wells Fargo; conference calls regarding same	0.5	375.00	187.50
5/5/2023	A Barreras	Work on notice of related cases for case 2:23-cv-00703 (0.6); work on notice of related cases for case 2:22-cv-00612 (0.6); work on notice of related cases for case 2:22-cv-00529 (0.6); review issued summons to Wells Fargo for case 2:23-cv-00703 (0.1)	1.9	145.00	275.50
5/5/2023	J Rickard	Review e-mail regarding Wells Fargo counsel accepting service; review notice of related cases; research regarding filing same	0.9	375.00	337.50
5/9/2023	O Kelly	E-mails with M Diaz-Cortes re USDC notifications (0.1)(2:23-cv-00703); e-mail pro hac vice application form/instructions to lead counsel (0.1) (2:23-cv-00703)	0.2	145.00	29.00
5/9/2023	J Rickard	E-mail regarding pro hac vice for Wells Fargo action	0.2	375.00	75.00
5/11/2023	J Rickard	E-mail regarding waiver of service for Wells Fargo Complaint	0.2	375.00	75.00
5/12/2023	O Kelly	File waiver of service (0.2); file certificate of interested parties/disclosure statement (0.3)	0.5	145.00	72.50
5/12/2023	J Rickard	Review and finalize certificate of interested parties	0.2	375.00	75.00
5/15/2023	O Kelly	E-mails with client/J Rickard re pro hac vice applications for M Diaz-Cortes, J Kellogg and J Schneider (0.1) (2:23-cv-00703); review/file pro hac vice applications/certificates of good standing for M Diaz-Cortes, J Kellogg and J Schneider (1.0)(2:23-cv-00703)	1.1	145.00	159.50
5/16/2023	O Kelly	Review orders granting pro hac vice applications for M Diaz-Cortes, J Kellogg and J Schneider (2:23-cv-00703)	0.2	145.00	29.00
5/22/2023	J Rickard	E-mail regarding form for stipulated protective order	0.3	375.00	112.50
5/30/2023	A Barreras	File joint stipulation and order re discovery coordination and case schedule	1.0	145.00	145.00
		Subtotal			2,412.00
		EXPENSES/COSTS			
5/4/2023		District Court Filing Fee		402.00	402.00
5/15/2023		Pro Hac Vice Application for Marcelo Diaz-Cortes		250.00	250.00
5/15/2023		Pro Hac Vice Application for Jason Kellogg		250.00	250.00
5/15/2023		Pro Hac Vice Application for Jeffrey Schneider		250.00	250.00
		Subtotal			1,152.00

Total Current Invoice \$3,564.00

Statement

LAWRENCE J SEMENZA, III, P.C.
 dba SEMENZA KIRCHER RICKARD
 10161 Park Run Drive, Suite 150
 Las Vegas, Nevada 89145
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Date: 7/7/2023

American Financial Services
 c/o Geoff Winkler
 2300 West Sahara Avenue, Suite 822
 Las Vegas, NV 89102
 Receiver for J&J Consulting Services, Inc

Open Invoices Now Due \$14,996.00

Date	Open Invoice	Balance Remaining	Total Due
	7092-01 Receiver in Nevada Actions-		
07/11/2022	INV #7092-01_01. Orig. Amount \$7,006.50.	951.30	951.30
08/30/2022	INV #7092-01_02. Orig. Amount \$5,744.50.	1,148.90	2,100.20
09/30/2022	INV #7092-01_03. Orig. Amount \$4,357.50.	833.90	2,934.10
10/09/2022	INV #7092-01_04. Orig. Amount \$2,555.50.	511.10	3,445.20
11/29/2022	INV #7092-01_05. Orig. Amount \$1,960.86.	419.96	3,865.16
12/28/2022	INV #7092-01_06. Orig. Amount \$4,709.60.	1,097.84	4,963.00
01/07/2023	INV #7092-01_07. Orig. Amount \$1,931.50.	386.30	5,349.30
02/28/2023	INV #7092-01_08. Orig. Amount \$2,249.00.	449.80	5,799.10
03/29/2023	INV #7092-01_09. Orig. Amount \$1,946.00.	378.20	6,177.30
04/06/2023	INV #7092-01_10. Orig. Amount \$3,588.50.	717.70	6,895.00
05/16/2023	INV #7092-01_11. Orig. Amount \$3,021.50.	3,021.50	9,916.50
06/26/2023	INV #7092-01_12. Orig. Amount \$3,564.00.	3,564.00	13,480.50
07/07/2023	INV #7092-01_13. Orig. Amount \$1,515.50.	1,515.50	14,996.00

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Date 7/7/2023
 Invoice Number 7092-01_13
 Client Number 7092
 Matter Number 01

RE: Receiver in Nevada Actions

BILL THROUGH DATE 6/30/2023

Date	Employee	Description	Hours	Rate	Amount
PROFESSIONAL FEES					
6/13/2023	O Kelly	File proposed stipulated protective order	0.7	145.00	101.50
6/13/2023	J Rickard	Review stipulated protective order with Wells Fargo; e-mail regarding same	0.5	375.00	187.50
6/14/2023	J Rickard	Review e-mail regarding Wells Fargo cross productions	0.4	375.00	150.00
6/14/2023	J Rickard	Review additional e-mail regarding Wells Fargo cross productions	0.3	375.00	112.50
6/21/2023	O Kelly	File motion to transfer	0.2	145.00	29.00
6/21/2023	J Rickard	Review for filing motion to transfer case	0.5	375.00	187.50
6/28/2023	O Kelly	Review file-stamped copy of stipulated protective order	0.1	145.00	14.50
6/29/2023	O Kelly	Review e-mails between client/J Rickard re hearing today (0.1)(22-cv-00612)	0.3	145.00	43.50
6/29/2023	J Rickard	Prepare for and attend status check hearing; meeting regarding same	1.8	375.00	675.00
6/30/2023	A Barreras	Review stipulation and order authorizing the sale of real property 2701 W. 390 N., Hurricane, UT	0.1	145.00	14.50
Subtotal					1,515.50

Total Current Invoice \$1,515.50