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14 *Attorneys for Receiver Geoff Winkler*

15
16 **UNITED STATES DISTRICT COURT**
17 **DISTRICT OF NEVADA**

18
19 SECURITIES AND EXCHANGE
COMMISSION,

20 Plaintiff,

21 vs.

22 MATTHEW WADE BEASLEY, *et al.*,

23 Defendants,

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

25 Relief Defendants.
26

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

Judge Hon. Cristina D. Silva

**SIXTH 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 Sixth Quarterly Application for Payment of Fees and
10 Reimbursement of Expenses (this "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 sixth quarterly application for payment of fees and
 5 reimbursement of expenses submitted by Allen Matkins and SKR in accordance with
 6 Paragraph 62 of the Appointment Order, and covers fees and expenses incurred between July 1,
 7 2023 and September 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	\$86,219.50 ¹	\$68,975.60	\$516.52	\$516.52
SKR	\$6,704.50	\$5,363.60	\$368.00	\$368.00
<u>TOTAL:</u>	\$92,924.00	\$74,339.20	\$884.52	\$884.52

20 In accordance with the commitment made to the Receiver by Allen Matkins and SKR in
 21 connection with their engagement in this matter, the fees identified above were billed at rates
 22 significantly discounted from Allen Matkins' and SKR's standard hourly rates, in certain cases
 23 reflecting discounts in excess of 40%, not including an additional line item discount applied by
 24 Allen Matkins to align its fees with the blended rate target previously established in this case. In
 25 addition, consistent with the billing guidelines of the SEC, and Allen Matkins' and SKR's

27 _____
 28 ¹ Allen Matkins has applied a line item discount of \$3,000.00 to the fees it incurred during the Application Period in order to align its fees with the blended rate target established 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 by, among other
8 things, securing the turnover of additional funds as authorized by the Appointment Order and
9 Amended Appointment Order, recovering personal property and real property and subsequently
10 monetizing certain of those assets for the benefit of the Receivership Estate, attending to his filing
11 obligations arising in connection with pending litigation, including a pending appeal to the Ninth
12 Circuit, and regularly reporting on his progress to this Court.

13 As reflected in prior applications for payment of fees and reimbursement of expenses in
14 this matter, the Receiver and his professionals have been required to expend significant time and
15 effort to preserve the *status quo*, pursue the recovery of receivership assets, and undertake efforts
16 to obtain financial documents and other information critical to the Receiver's administration of the
17 Estate, his evaluation of prospective creditor claims, and any clawback or disgorgement litigation
18 that the Receiver ultimately determines, in his reasonable business judgment, is required to
19 recover assets for the benefit of the Estate and its creditors. While a full accounting of the
20 Receiver's efforts and success is impracticable here, as reflected in the Receiver's interim
21 reporting, his asset recovery efforts have been remarkably successful. Indeed, as of the date of
22 this Application, the Receiver's efforts have resulted in the recovery of assets – including cash,
23 financial instruments, vehicles, a private aircraft, cryptocurrency, real property, and other assets –
24 with an estimated aggregate value of more than \$80 million.

25 In addition, in coordination with Allen Matkins and SKR, the Receiver has continued to
26 attend to critical case administration deadlines and other matters of importance to the receivership,
27 and continued his efforts to obtain and review essential documents relating to the business and
28 financial activities of the Receivership Defendants.

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

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

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

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

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

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

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

27 During the Application Period, Allen Matkins extensively assisted the Receiver in the
28 performance of his duties under the Appointment Order, primarily by attending to matters critical

1 to Receivership Estate administration, asset recovery and disposition, and pending and anticipated
2 litigation.

3 In all, on account of its services rendered to the Receiver during the Application Period,
4 Allen Matkins billed 168.1 hours and \$89,219.50 in fees, and incurred \$516.52 in expenses, across
5 the following categories²:

<u>Category</u>	<u>Hours</u>	<u>Fees</u>	<u>Expenses</u>
General Receivership	91.8	\$48,723.50	\$516.52
Asset Recovery & Management	9.9	\$5,395.50	\$0.00
Investigation & Reporting	50.4	\$26,930.50	\$0.00
Sale, Disposition & Transfer of Assets	2.2	\$1,149.00	\$0.00
Pending Litigation	0.7	\$381.50	\$0.00
Third Party Claims & Recoveries	13.1	\$6,639.50	\$0.00
<u>TOTAL:</u>	168.1	\$89,219.50	\$516.52
<u>\$ FEE DISCOUNT³ APPLIED:</u>		(\$3,000.00)	\$0.00
<u>TOTAL AFTER DISCOUNT</u>		\$86,219.50	\$516.52

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

21 As it has since the inception of this matter, Allen Matkins endeavored to staff each task
22 efficiently, using a core team of attorneys, with specialized assistance as necessary. As the Court
23

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 \$3,000.00 to the fees
incurred during the Application Period in order to better align its fees with previously
proposed blended rates.

1 and interested parties may recall, Allen Matkins also agreed to a significant discount from its
 2 ordinary billing rates for this matter, as well as not to charge the Estate for any travel time
 3 associated with services provided to the Receiver. Accordingly, the fees identified below were
 4 billed at rates reflecting discounts of as much as 40%, resulting in substantial savings for the
 5 Estate.⁴ In addition, and as noted above and further detailed in the Declarations submitted in
 6 support of this Application, Allen Matkins' fee and expense records were transmitted to the SEC
 7 for review on a monthly basis, and have drawn no objection.

8 **1. General Receivership.**

9 During the Application period, Allen Matkins attorneys billed 91.8 hours to the "General
 10 Receivership" work category. Allen Matkins also incurred \$516.52 in general expenses,
 11 consisting almost entirely of monthly fees for electronic document hosting and management
 12 services. Allen Matkins personnel billed the following time and fees during the Application
 13 Period:

<u>Timekeeper</u>	<u>Position</u>	<u>Hourly Rate</u>	<u>Hours</u>	<u>Fees</u>
David Zaro	Partner	\$545	2.5	\$1,362.50
Joshua del Castillo	Partner	\$545	76.7	\$41,801.50
Matthew Pham	Associate	\$445	0.8	\$356.00
James Robichaud	Associate	\$445	11.3	\$5,028.50
Simona Peng	Paralegal	\$350	0.5	\$175.00
<u>TOTAL:</u>			91.8	\$48,723.50

21
 22 Work performed in this category generally related to critical case and Estate administration
 23 matters. During the Application Period, Allen Matkins personnel: (1) attended to outstanding
 24 case administration tasks; (2) with the Receiver and co-counsel, developed strategic plans for the
 25 administration of the Estate; (3) attended to issues arising in connection with a pending Ninth

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 Circuit appeal filed by prospective intervenors in the above-entitled action, and engaged in
 2 extensive legal analysis and briefing in connection therewith; (4) monitored the relevant dockets in
 3 connection with pending litigation; and (5) prepared for and attended meetings of counsel and
 4 Court hearings. As a result of these efforts, the Receiver has streamlined his case and Estate
 5 administration strategy, appropriately responded to numerous pleadings that directly implicated
 6 the viability of the Court's receivership, and continued to pursue his obligations to the Court and
 7 interested parties.

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

9 During the Application period, Allen Matkins attorneys billed 9.9 hours to the "Asset
 10 Recovery & Management" work category. Allen Matkins personnel billed the following time and
 11 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	1.6	\$872.00
Joshua del Castillo	Partner	\$545	8.3	\$4,523.50
<u>TOTAL:</u>			9.9	\$5,395.50

16
 17 Work performed in this category related to the Receiver's efforts to recover from third
 18 parties assets subject to the turnover provisions of the Appointment Order and Amended
 19 Appointment Order, which require all third parties in possession of assets of the Receivership
 20 Defendants to turn such assets over to the Receiver. During the Application Period, and among
 21 other things, Allen Matkins attorneys: (1) prepared, issued, and followed up regarding written
 22 turnover demands; (2) prepared stipulations for the turnover of receivership assets held by third
 23 parties; (3) communicated with third parties, including financial institutions, to ensure ongoing
 24 compliance with turnover demands; (4) reviewed materials and prepared subpoenas in connection
 25 with the Receiver's asset recovery efforts; and (5) communicated with financial institutions to
 26 ensure that actual bank account turnovers matched the agreed-upon turnovers.

1 As noted above, these efforts have contributed to the Receiver's recovery of more than
 2 approximately \$80 million in cash, vehicles, a private aircraft, cryptocurrency, real property, and
 3 other assets for the benefit of the Estate and its creditors.

4 **3. Investigation and Reporting.**

5 During the Application period, Allen Matkins attorneys billed 50.4 hours to the
 6 "Investigation & Reporting" work category. Allen Matkins personnel billed the following time
 7 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	11.7	\$6,376.50
Joshua del Castillo	Partner	\$545	33.8	\$18,421.00
Matthew Pham	Associate	\$445	3.5	\$1,557.50
James Robichaud	Associate	\$445	0.9	\$400.50
Simona Peng	Paralegal	\$350	0.5	\$175.00
<u>TOTAL:</u>			50.4	\$26,930.50

15
 16 Work performed in this category related largely to the Receiver's ongoing document
 17 recovery and review efforts, as well as to the Receiver's reporting obligations to the Court. During
 18 the Application Period, and among other things, Allen Matkins attorneys: (1) drafted a motion
 19 seeking to establish discovery procedures applicable to discovery requests propounded upon the
 20 Receiver, with an eye towards minimizing potential costs and the administrative burden upon the
 21 Receiver and his staff in connection with the preparation of the Receiver's response to anticipated
 22 discovery requests; (2) assisted with the satisfaction of the Receiver's reporting obligations to the
 23 Court; (3) engaged in ongoing and extensive discovery efforts in coordination with financial
 24 institutions believed to be in possession of relevant receivership and Receivership Defendant
 25 records; (4) prepared and served formal subpoenas and document requests; and (5) coordinated
 26 with the Receiver to manage and input into the proper document management system documents
 27 produced directly to Allen Matkins. As of the date of this Application, Allen Matkins has issued
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1 dozens of document requests and subpoenas, covering hundreds of accounts, and continues to
2 coordinate the production of records from multiple financial institutions.

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

4 During the Application period, Allen Matkins attorneys billed 2.2 hours to the "Sale,
5 Disposition & Transfer of Assets" work category.

6 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>
Joshua del Castillo	Partner	\$545	1.7	\$926.50
Matthew Pham	Associate	\$445	0.5	\$222.50
<u>TOTAL:</u>			2.2	\$1,149.00

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12 Work performed in this category related to the Receiver's ongoing and successful asset
13 disposition efforts, including with respect to some of the Estate's most valuable personal and real
14 property. Among other things, during the Application Period, Allen Matkins attorneys:
15 (1) reviewed title and related documents in anticipation of the sale of a real property;
16 (2) monitored pending real property sales and prepared stipulations and other documents in
17 connection therewith; and (3) undertook to terminate two *lis pendens* following the Receiver's sale
18 of the underlying real property for the benefit of the Estate. As a result of these efforts, the
19 Receiver has recovered tens of millions of dollars in net proceeds from the sale of personal and
20 real property assets, with potentially millions of dollars in additional sales expected over the
21 course of the receivership.

22 **5. Pending Litigation**

23 During the Application period, Allen Matkins attorneys billed 0.7 hours to the "Pending
24 Litigation" work category.

25 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>
Joshua del Castillo	Partner	\$545	0.7	\$381.50
<u>TOTAL:</u>			0.7	\$381.50

1 The limited time expended in this category during the Application Period consisted of an
 2 Allen Matkins attorney conferring with the Receiver's various counsel regarding pending and
 3 anticipated litigation.

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

5 During the Application period, Allen Matkins attorneys billed 13.1 hours to the "Third
 6 Party Claims & Recoveries" work category.

7 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>
Joshua del Castillo	Partner	\$545	8.1	\$4,414.50
Matthew Pham	Associate	\$445	0.3	\$133.50
James Robichaud	Associate	\$445	4.7	\$2,091.50
<u>TOTAL:</u>			13.1	\$6,639.50

14 Work performed in this category related to the Receiver's ongoing examination and
 15 evaluation of potential claims against third parties and actionable conduct appearing to implicate
 16 the interests of the Estate. Among other things, during the Application Period, Allen Matkins
 17 attorneys: (1) engaged in an extensive review of documents produced by third parties in
 18 possession of receivership assets in connection with the Receiver's evaluation of the viability of
 19 pursuing litigation against such third parties; and (2) reviewed the actions of third parties in
 20 possession of receivership investment assets and evaluated the viability of prospective claims
 21 arising therefrom.

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

23 During the Application Period, SKR provided critical local counsel support to the
 24 Receiver, including in connection with the preparation, finalization, and filing of key documents in
 25 the above-entitled action. SKR expended a substantial portion of its time during the Application
 26 Period in connection with the Receiver's ongoing litigation efforts against certain third parties,
 27 including a financial institution with which the Receivership Defendants banked extensively.
 28 Among other things, SKR attorneys and staff: (1) monitored the appropriate dockets and kept co-

1 counsel and the Receiver apprised of developments; (2) prepared for and attended court hearings;
2 and (3) drafted and filed certain pleadings in collaboration with co-counsel.

3 In addition, SKR attorneys and staff: (1) worked with Allen Matkins to facilitate the
4 Receiver's discovery efforts, including by corresponding with the responding parties concerning
5 the scope of documents responsive to the Receiver's subpoenas and potential protective orders;
6 (2) prepared and reviewed stipulations in connection with the sale of real property for the benefit
7 of the Estate; (3) undertook to terminate two *lis pendens* following the Receiver's sale of the
8 underlying real property; (4) drafted subpoenas in connection with the Receiver's investigative
9 efforts; and (5) otherwise assisted the Receiver and Allen Matkins, as necessary, with the
10 preparation and filing of pleadings in the above-entitled action. A complete description of the
11 services rendered by SKR can be found in the invoices collectively appended hereto as **Exhibit 2**.

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

<u>Month</u>	<u>Total Fees Billed</u>
July 2023	\$1,934.50
August 2023	\$3,520.50
September 2023	\$1,249.50
<u>TOTAL:</u>	<u>\$6,704.50</u>

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20 **IV. THE FEES AND EXPENSES INCURRED ARE REASONABLE AND SHOULD BE**
21 **ALLOWED.**

22 Allen Matkins and SKR respectfully submit that the fees and expenses incurred during the
23 Application Period were fair, reasonable, and necessary, and that the associated services provided
24 were of significant benefit to the Estate. Specifically, and as reflected in **Exhibits 1** and **2**, Allen
25 Matkins and SKR have endeavored to staff this matter appropriately and have billed their time at
26 substantially discounted rates. Additionally, Allen Matkins and SKR have steadfastly attempted
27 to avoid duplication of effort by, among other things, coordinating with the Receiver and co-
28

1 counsel to allocate tasks and responsibilities and participating in regular discussions regarding
2 work in progress to minimize the likelihood of duplication.

3 As reflected in the Receiver's prior submissions to this Court, Allen Matkins and SKR are
4 providing an extremely high quality of work in a matter involving dozens of relevant parties and
5 hundreds of millions of dollars in assets. Their efforts are bearing fruit: the Receiver has
6 recovered more than \$80 million in personal and real property assets. He has consistently
7 succeeded in securing necessary and appropriate relief from the Court, the turnover of cash and
8 other assets, and the sales of personal and real property. Put simply, in a highly complex
9 receivership, and while the Receiver continues to develop a comprehensive knowledge and
10 understanding the underlying facts, critical players, and assets, the Receiver – with the help of
11 Allen Matkins and SKR – is recovering millions of dollars in cash, obtaining the turnover of
12 millions of dollars in personal and real property, and has already secured Court approval of and
13 successfully undertaken procedures aimed at monetizing those assets in a manner intended to
14 maximize the recovery for the benefit of the Estate and creditors, including investors. The fees
15 and expenses incurred by Allen Matkins and SKR during the Application Period are minimal
16 when compared to these results⁵, and Allen Matkins and SKR respectfully request that the Court
17 approve 100% of their fees and expenses, and also authorize the payment of those fees and
18 expenses on a percentage, interim basis, as requested herein.

19 Allen Matkins' and SKR's invoices were submitted to the SEC for review prior to the filing
20 of this Application, and as of the date of the filing of this Application, the SEC has not indicated
21 that it has substantive questions regarding, or will oppose, the Application.

22 **V. CONCLUSION.**

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

- 25 1. Granting this Application in its entirety;
- 26
27

28 ⁵ Indeed, the less than \$100,000.00 requested in this application reflects approximately one tenth
of one percent of the approximately \$80 million in assets already recovered by the Receiver.

1 2. Approving Allen Matkins' fees and expenses incurred during the Application
2 Period, in the respective amounts of \$86,219.50 and \$516.52;

3 3. Authorizing the Receiver to pay Allen Matkins, on an interim basis, 80% of its
4 approved fees incurred during the Application Period, in the amount of \$68,975.60 and 100% of
5 its approved expenses incurred during the Application Period, in the amount of \$516.52, from the
6 funds of the Receivership Estate;

7 4. Approving SKR's fees and expenses incurred during the Application Period, in the
8 respective amounts of \$6,704.50 and \$368.00; and

9 5. Authorizing the Receiver to pay SKR, on an interim basis, 80% of its approved fees
10 incurred during the Application Period, in the amount of \$5,363.60 and 100% of its approved
11 expenses incurred during the Application Period, in the amount of \$368.00; and

12 6. Providing such other and further relief as the Court deems just and proper.

13 Dated: November 13, 2023

SEMENZA KIRCHER RICKARD

/s/ Jarrod L. Rickard

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Katie L. Cannata, Bar No. 14848
10161 Park Run Drive, Suite 150
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ALLEN MATKINS LECK GAMBLE
MALLORY & NATSIS LLP

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Joshua A. del Castillo (admitted *pro hac vice*)
Matthew D. Pham (admitted *pro hac vice*)
865 South Figueroa Street, Suite 2800
Los Angeles, California 90017-2543

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 13th day of November, 2023, I served the document(s), described as:

SIXTH 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:

Dean Y. Kajioka attorneys@kajiokalawlv.com

Garrett T Ogata (Terminated) court@gtogata.com

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Kamille Dean Kamille@kamilledean.com

b. **BY U.S. MAIL.** I deposited such envelope in the mail at Las Vegas, Nevada. The envelope(s) were mailed with postage thereon fully prepaid. I am readily familiar with Semenza Kircher Rickard's practice of collection and processing correspondence for mailing. Under that practice, documents are deposited with the U.S. Postal Service on the 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.

c. **BY PERSONAL SERVICE.**

d. **BY DIRECT EMAIL.**

e. **BY FACSIMILE TRANSMISSION.**

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

/s/ Olivia A. Kelly
An Employee of Semenza Kircher Rickard

EXHIBIT 1

EXHIBIT 1

11/09/23 12:11:27 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: 09/20/23

Matter Name: General Receivership

Proforma Number: 1244757

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		
07/06/23	9279107	Analysis and determination of document productions in preparation for attorney review.	Peng, Simona	0.50	175.00	175.00	WO	HD	TR	_____
07/06/23	9296319	Virtually attend weekly meet with client, Allen Matkins, and Greenberg Traurig regarding case updates and outstanding tasks	Pham, Matt D.	0.30	133.50	308.50	WO	HD	TR	_____
07/10/23	9274078	Review Ninth Circuit docket (0.2); review notes from discussions with Receiver and SEC regarding Receiver's appellate brief (0.3); legal analysis of standing inquiry (0.9).	Del Castillo, Joshua	1.40	763.00	1,071.50	WO	HD	TR	_____
07/13/23	9277388	Confer with J. Robichaud regarding upcoming appellate briefing (0.2); additional analysis of authorities in connection with contemplated respondent's brief (1.5).	Del Castillo, Joshua	1.70	926.50	1,998.00	WO	HD	TR	_____
07/18/23	9282452	Additional review of Shahabe Ninth Circuit opening brief, prepare initial notes, and confer with counsel regarding same (2.7).	Del Castillo, Joshua	2.70	1,471.50	3,469.50	WO	HD	TR	_____

11/09/23 12:11:27 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		
07/18/23	9283745	Further research and analysis related to the intervenors appellate brief, follow-up meeting with counsel related to Receiver brief.	Zaro, David	0.80	436.00	3,905.50	WO	HD	TR	_____
07/18/23	9295102	Review Shahabe/Intervenor/Appellants' opening brief (1.1).	Robichaud, James	1.10	489.50	4,395.00	WO	HD	TR	_____
07/19/23	9282703	Attention to administrative matters regarding Receiver's Ninth Circuit Respondent's Brief (0.7); emails with SEC regarding Receiver's anticipated request for deadline extension (0.2); prepare update to Receiver (0.2); confer with counsel regarding necessary additional research (0.5); commence preparation of research and briefing outline (0.9).	Del Castillo, Joshua	2.50	1,362.50	5,757.50	WO	HD	TR	_____
07/20/23	9295128	Attention to outstanding case administration matters and confer with AM counsel regarding same (0.7); prepare updates to Receiver's office regarding pending motions, turnover developments, appeal, and other case administration efforts (1.1); emails with counsel regarding additional research for appeal (0.5).	Del Castillo, Joshua	2.30	1,253.50	7,011.00	WO	HD	TR	_____
07/20/23	9296416	Virtually attend meeting with client, Allen Matkins, and Greenberg Traurig regarding case updates	Pham, Matt D.	0.30	133.50	7,144.50	WO	HD	TR	_____
07/21/23	9286147	Attention to appellate admin matters in connection with Shahabe intervenor appeal (1.0).	Del Castillo, Joshua	1.00	545.00	7,689.50	WO	HD	TR	_____

11/09/23 12:11:27 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		
07/24/23	9286814	Review notes and correspondence and confer with counsel regarding pending case administration matters (0.5).	Del Castillo, Joshua	0.50	272.50	7,962.00	WO	HD	TR	_____
07/25/23	9288022	Emails regarding Ninth Circuit extension for deadline to file opening brief in intervenor appeal (0.3); review docket in connection with same (0.2).	Del Castillo, Joshua	0.50	272.50	8,234.50	WO	HD	TR	_____
07/27/23	9290310	Prepare for and attend videoconference with Receiver's office and co-counsel at GT (0.6).	Del Castillo, Joshua	0.60	327.00	8,561.50	WO	HD	TR	_____
07/28/23	9291660	Review docket and recent court orders (0.2); follow-up correspondence to Receiver's office regarding anticipated filings (0.2).	Del Castillo, Joshua	0.40	218.00	8,779.50	WO	HD	TR	_____
07/29/23	9294062	Review dockets and notes from discussion with Receiver's office and attend to Receiver's requests (0.9).	Del Castillo, Joshua	0.90	490.50	9,270.00	WO	HD	TR	_____
08/01/23	9300159	Prepare emails to J. Robichaud regarding interevnor appellate brief (0.5); legal analysis of argument presented in appellate brief (0.7).	Del Castillo, Joshua	1.20	654.00	9,924.00	WO	HD	TR	_____
08/03/23	9302007	Prepare for and attend videconferenece with Receiver's office regarding case administration matters (0.5); review and respond to correspondence from court and co-counsel regarding motion schedule and associated matters (0.4); attention to issues regarding intervenor appeal and continue legal analysis for same (2.2).	Del Castillo, Joshua	3.10	1,689.50	11,613.50	WO	HD	TR	_____

11/09/23 12:11:27 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		
08/08/23	9305485	Confer with AM counsel regarding outstanding case administration matters (0.5).	Del Castillo, Joshua	0.50	272.50	11,886.00	WO	HD	TR	_____
08/09/23	9330669	Phone call with Greg Garman regarding professional fees of J&J debtors' counsel	Pham, Matt D.	0.20	89.00	11,975.00	WO	HD	TR	_____
08/10/23	9307563	Prepare for and attend videoconference with Receiver's office and GT counsel regarding case administration matters (0.6).	Del Castillo, Joshua	0.60	327.00	12,302.00	WO	HD	TR	_____
08/11/23	9309854	Legal analysis regarding intervenor claims with respect to standard of review and order from which intervenors appeal (1.3).	Robichaud, James	1.30	578.50	12,880.50	WO	HD	TR	_____
08/14/23	9328985	Legal analysis of issues presented in Intervenor Appellate Brief and review additional case law regarding same (2.5); prepare revised outline for brief (0.6); emails with Receiver's office and AM counsel regarding same (0.5).	Del Castillo, Joshua	3.60	1,962.00	14,842.50	WO	HD	TR	_____
08/16/23	9312602	Confer with J. Robichaud regarding analysis of issues for appellate briefing (0.5); revise outline (0.4); commence review of documents and preparation of statement of facts (1.5).	Del Castillo, Joshua	2.40	1,308.00	16,150.50	WO	HD	TR	_____
08/17/23	9313838	Legal analysis regarding relevance of magistrate judge's affirmed order to intervenors' appeal (.8).	Robichaud, James	0.80	356.00	16,506.50	WO	HD	TR	_____
08/17/23	9328980	Confer with AM counsel regarding pending case administration matters and follow-up correspondence to Receiver's office and outside counsel regarding same (0.8);	Del Castillo, Joshua	2.80	1,526.00	18,032.50	WO	HD	TR	_____

11/09/23 12:11:27 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		
		confer with J. Robichaud regarding additional intervenor appeal analysis (0.7); review materials transmitted by J. Robichaud (1.3).								
08/18/23	9314652	Complete legal analysis and drafting regarding intervenors' 9th Circuit appeal (2.1).	Robichaud, James	2.10	934.50	18,967.00	WO	HD	TR	_____
08/18/23	9315402	Revises and complete initial draft of appellate statement of facts (2.0); legal analysis and revise extended outline for argument section of appellate brief (2.8); prepare draft standard of review (0.5); prepare draft language regarding MIMO netting analysis (0.7).	Del Castillo, Joshua	6.00	3,270.00	22,237.00	WO	HD	TR	_____
08/21/23	9316889	Complete analysis for and prepare in pari delicto section of intervenor appellate argument (1.5).	Del Castillo, Joshua	1.50	817.50	23,054.50	WO	HD	TR	_____
08/22/23	9318207	Prepare draft untimeliness and MIMO sections of appellate brief (3.4).	Del Castillo, Joshua	3.40	1,853.00	24,907.50	WO	HD	TR	_____
08/23/23	9319172	Legal analysis regarding intervenors' rights to enforce underlying purported settlement sales agreements between Beasley and tort claimant (.7); legal analysis regarding intervenors' right to intervene generally, pursuant to FRCP (.2).	Robichaud, James	0.90	400.50	25,308.00	WO	HD	TR	_____
08/23/23	9319324	Legal analysis and prepare adequate representation section of appellate brief regarding intervenors (1.5); confer with J. Robichaud regarding additional required legal research and review memoranda	Del Castillo, Joshua	3.40	1,853.00	27,161.00	WO	HD	TR	_____

11/09/23 12:11:27 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			
		regarding same (0.6); revise portions of draft brief (1.3).								
08/24/23	9320552	Commence preparation of intervenor appeal supplemental record (2.0).	Robichaud, James	2.00	890.00	28,051.00	WO	HD	TR	_____
08/24/23	9328977	Review materials in connection with upcoming video conference with Receiver's office (0.5); prepare for and attend conference with Receiver's office and GT counsel (0.5); confer with M. Pham regarding critical pending case administration matters (0.6).	Del Castillo, Joshua	1.60	872.00	28,923.00	WO	HD	TR	_____
08/25/23	9321153	Additional legal analysis arising in connection with prospective novel arguments for appellate (intervenor) brief (2.4); complete initial draft of brief and deliver to Receiver for review and comment (2.6).	Del Castillo, Joshua	5.00	2,725.00	31,648.00	WO	HD	TR	_____
08/28/23	9323228	Review notes and correspondence from Receiver's office and co-counsel and attention to pending case administration tasks (0.6); confer with J. Robichaud regarding updates to appellate brief (0.5).	Del Castillo, Joshua	1.10	599.50	32,247.50	WO	HD	TR	_____
08/29/23	9324849	Confer with J. Robichaud regarding designation of supplemental record (0.5); review main receivership case docket (0.2); emails with Receiver and co-counsel regarding report due to Court and prepare language for same (0.6).	Del Castillo, Joshua	1.30	708.50	32,956.00	WO	HD	TR	_____
08/29/23	9324904	Update list of documents for inclusions in Supplement to Excerpts of Record (.7).	Robichaud, James	0.70	311.50	33,267.50	WO	HD	TR	_____

11/09/23 12:11:27 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		
08/30/23	9326390	Emails with AM counsel and attention to pending case administration deadlines (0.5); prepare for and conference with Receiver's office (0.3); review and respond to correspondence from SEC regarding intervenor appeal and provide updates to Receiver regarding same (0.5).	Del Castillo, Joshua	1.30	708.50	33,976.00	WO	HD	TR	_____
08/31/23	9328354	Prepare for and videoconference with Receiver and co-counsel regarding case administration matters (0.5).	Del Castillo, Joshua	0.50	272.50	34,248.50	WO	HD	TR	_____
09/01/23	9353726	Emails with D. Zaro, M. Pham, and Receiver's office regarding pending case administration matters (0.6); confer regarding additional arguments to appellate (intervenor) brief and prepare same for review and discussion (1.6).	Del Castillo, Joshua	2.20	1,199.00	35,447.50	WO	HD	TR	_____
09/05/23	9334981	Review docket and emails with AM and GT counsel regarding pending filings (0.5).	Del Castillo, Joshua	0.50	272.50	35,720.00	WO	HD	TR	_____
09/05/23	9366835	Follow-up to evaluate/revise the Receiver's response to appellate brief of intervention by investors (.7).	Zaro, David	0.70	381.50	36,101.50	WO	HD	TR	_____
09/06/23	9335898	Review recent status report and confer with counsel regarding same (0.3); attention to case administration matters and audit outstanding case administration tasks in connection with prospective transition of tasks to GT counsel as of Q1 2024 (1.3); confer with J. Ronichaud regarding revisions to intervenor Ninth Circuit brief and status of supplemental excerpts of	Del Castillo, Joshua	2.60	1,417.00	37,518.50	WO	HD	TR	_____

11/09/23 12:11:27 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		
		record (0.5); review materials in connection with same (0.5).								
09/06/23	9336058	Continue drafting revisions to motion to intervene appeal (1.1).	Robichaud, James	1.60	712.00	38,230.50	WO	HD	TR	_____
09/07/23	9337279	Attend to revisions to appellate opening brief (1.0); attention to outstanding case administration inquiry from Receiver's office (0.5).	Del Castillo, Joshua	1.50	817.50	39,048.00	WO	HD	TR	_____
09/11/23	9339539	Attention to case management matters and emails with J. Rickard regarding upcoming status conference (0.5).	Del Castillo, Joshua	0.50	272.50	39,320.50	WO	HD	TR	_____
09/13/23	9341358	Emails with J. Robichaud, M. Pham, and D. Zaro regarding pending case administration matters (0.8); review recent filings and orders (0.3).	Del Castillo, Joshua	1.10	599.50	39,920.00	WO	HD	TR	_____
09/13/23	9366839	Several calls concerning the hearing and review of the court order/filing (.3).	Zaro, David	0.30	163.50	40,083.50	WO	HD	TR	_____
09/14/23	9349262	Review report/emails and prepare for/attend the court hearing concerning report/recommendations (.7).	Zaro, David	0.70	381.50	40,465.00	WO	HD	TR	_____
09/19/23	9347744	Review file, correspondence with AM counsel, and attention to pending case administration matters (0.5).	Del Castillo, Joshua	0.50	272.50	40,737.50	WO	HD	TR	_____
09/20/23	9348686	Emails and teleconferences with AM counsel and SEC appellate counsel regarding intervenor appeal and upcoming briefing and related matters (1.0).	Del Castillo, Joshua	1.00	545.00	41,282.50	WO	HD	TR	_____

11/09/23 12:11:27 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		
09/21/23	9350190	Emails with SEC regarding pending intervenor appeal and confer with J. Robichaud regarding same (0.7); prepare for and attend videoconference with Receiver and GT co-counsel (0.4).	Del Castillo, Joshua	1.10	599.50	41,882.00	WO	HD	TR	_____
09/22/23	9353064	Additional analysis for appellate (intervenor) brief (1.4); emails and teleconferences with AM counsel regarding same (0.7).	Del Castillo, Joshua	2.10	1,144.50	43,026.50	WO	HD	TR	_____
09/25/23	9353607	Review draft appellate opening brief (intervenor) and prepare additional edits (1.5); complete additional legal analysis for same (1.5); confer with J. Robichaud regarding procedural issue presented by potential federal government shutdown (0.3).	Del Castillo, Joshua	3.30	1,798.50	44,825.00	WO	HD	TR	_____
09/25/23	9353690	Confer with J. del Castillo and legal analysis regarding impact of possible federal government shutdown on filing deadlines with respect to Shahabe/Intervenor's brief, in general and in light of Federal agency being party to the action (.8).	Robichaud, James	0.80	356.00	45,181.00	WO	HD	TR	_____
09/26/23	9354630	Complete revisions and substantive additions to appellate (intervenor) brief (2.7); email to Receiver regarding same (0.1).	Del Castillo, Joshua	2.80	1,526.00	46,707.00	WO	HD	TR	_____
09/28/23	9357319	Prepare for and attend videoconference with Receiver and GT co-counsel regarding pending case administration issues (0.5).	Del Castillo, Joshua	0.50	272.50	46,979.50	WO	HD	TR	_____
09/29/23	9358905	Review SEC Answering Brief in intervenor appeal and review correspondence from	Del Castillo, Joshua	1.10	599.50	47,579.00	WO	HD	TR	_____

11/09/23 12:11:27 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
		SEC counsel regarding same (1.1).						
09/30/23	9363311	Prepare additional updates and revisions to appellate (intervenor) opening brief and correspondence to J. Robichaud regarding same (2.1).	Del Castillo, Joshua	2.10	1,144.50	48,723.50	WO	HD TR

Disbursements for Matter 392775.00002 (General Receivership)

Trans Date	Index	Type	Quantity	Amt	Circle	Action
07/01/23	2826544	EDISC – CS Disco, Inc. - Monthly Hosting for July 2023	0.00	169.44	WO	HD TR
07/05/23	2838591	DCSRCH – Document Search - - PACER - Usage 2ND QTR	0.00	6.40	WO	HD TR
07/05/23	2838592	DCSRCH – Document Search - - PACER - Usage 2ND QTR	0.00	1.80	WO	HD TR
08/01/23	2832674	EDISC – CS Disco, Inc. - Monthly Hosting for August 2023	0.00	169.44	WO	HD TR
09/01/23	2840524	EDISC – CS Disco, Inc. - Monthly Hosting for September 2023	0.00	169.44	WO	HD TR

Proforma Summary

Timekeeper		Hours	Rate	Amounts
Number	Timekeeper			
000313	Zaro, David	2.50	545.00	1,362.50
001842	Del Castillo, Joshua	76.70	545.00	41,801.50
002307	Peng, Simona	0.50	350.00	175.00
002510	Pham, Matt D.	0.80	445.00	356.00
002592	Robichaud, James	11.30	445.00	5,028.50
		91.80		\$48,723.50
Subtotal Fees				\$48,723.50
Discount				0.00
Total Fees				48,723.50
Total Disbursements				516.52

11/09/23 12:11:27 PROFORMA STATEMENT FOR MATTER 392775.00002 (Winkler, Geoff - Receiver for J&J Consul) (General Receivership)

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 11/09/23

	Fiscal YTD			Calendar YTD			LTD		
	Total	Fees	Disb.	Total	Fees	Disb.	Total	Fees	Disbursements
Worked	60,485.05	60,419.50	65.55	106,884.54	104,048.00	2,836.54	210,349.60	194,936.50	15,413.10
Unbilled Adj	0.00	0.00	0.00	17.21	17.21	0.00	1,790.80	1,446.80	344.00
Billed	21,362.77	20,088.80	1,273.97	79,442.07	69,628.31	9,813.76	133,313.22	133,313.22	14,896.58
Collected	21,362.77	20,088.80	1,273.97	79,442.07	69,628.31	9,813.76	148,209.80	133,313.22	14,896.58
AR Write Off	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00
WIP Balance	61,191.71	60,419.50	772.21						
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

11/09/23 12:11:30 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: 09/20/23

Matter Name: Asset Recovery & Management

Proforma Number: 1244757

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		
07/05/23	9270970	Review court orders and correspondence from Wells Fargo and attention to turnover inquiries from Receiver and D. Zaro (1.0).	Del Castillo, Joshua	1.00	545.00	545.00	WO	HD	TR	_____
07/06/23	9271548	Emails with Wells Fargo counsel and Receiver regarding additional turnover and review materials transmitted by Wells in connection with same (0.5).	Del Castillo, Joshua	0.50	272.50	817.50	WO	HD	TR	_____
07/06/23	9271811	Confer with D. Zaro regarding Receiver inquiry regarding asset recovery claims and re-transmit analysis for same (0.5).	Del Castillo, Joshua	0.50	272.50	1,090.00	WO	HD	TR	_____
07/10/23	9274186	Emails with Receiver's office and co-counsel regarding WF turnover (0.3); follow-up with J. Robichaud regarding outstanding turnover issues (0.3).	Del Castillo, Joshua	0.60	327.00	1,417.00	WO	HD	TR	_____
07/10/23	9278079	Several emails/call with Receiver counsel related to the recovery of deposit funds/affiliates (.3). Analysis of issues related to the deposits/funds arising out of affiliate transactions and review orders (.4).	Zaro, David	0.70	381.50	1,798.50	WO	HD	TR	_____

11/09/23 12:11:30 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		
07/11/23	9278237	Evaluate the pending order to show cause/Madsen briefing and analysis of recent response to SEC briefing, follow-up with Receiver counsel.	Zaro, David	0.60	327.00	2,125.50	WO	HD	TR	_____
07/12/23	9278363	Call with Receiver/counsel related to the turnover issues concerning Madsen/affiliate entities.	Zaro, David	0.30	163.50	2,289.00	WO	HD	TR	_____
07/17/23	9280184	Review and respond to bank counsel correspondence regarding additional pending turnovers (0.3).	Del Castillo, Joshua	0.30	163.50	2,452.50	WO	HD	TR	_____
07/20/23	9283551	Emails with lender counsel and Receiver's office regarding additional Wells Fargo turnover (0.5).	Del Castillo, Joshua	0.50	272.50	2,725.00	WO	HD	TR	_____
07/21/23	9286138	Review and respond to correspondence from Receiver's office regarding asset turnovers (0.5); emails and voicemail to bank counsel regarding additional account turnovers and review accounting regarding same (1.1); emails and teleconferences with AM team regarding pending asset recovery matters (0.5).	Del Castillo, Joshua	2.10	1,144.50	3,869.50	WO	HD	TR	_____
08/15/23	9311193	Review and respond to bank correspondence regarding outstanding turnover inquiries (0.6).	Del Castillo, Joshua	0.60	327.00	4,196.50	WO	HD	TR	_____
09/11/23	9339504	Review stipulation regarding Madsen turnover (0.1); confer with J. Robichaud regarding outstanding turnover and asset recovery matters (0.5).	Del Castillo, Joshua	0.60	327.00	4,523.50	WO	HD	TR	_____

11/09/23 12:11:30 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
09/28/23	9357360	Legal analysis regarding Receiver's right to encumber assets of party in receipt of receivership funds as security for disgorgement commitment (1.1); confer with AM counsel regarding same (0.5).	Del Castillo, Joshua	1.60	872.00	5,395.50	WO	HD TR

Proforma Summary

Timekeeper

Number	Timekeeper	Hours	Rate	Amounts
000313	Zaro, David	1.60	545.00	872.00
001842	Del Castillo, Joshua	8.30	545.00	4,523.50
		<u>9.90</u>		<u>\$5,395.50</u>
Subtotal Fees				\$5,395.50
Discount				0.00
Total Fees				5,395.50
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 11/09/23

	Fiscal YTD		Calendar YTD				LTD		
	Total	Fees	Disb.	Total	Fees	Disb.	Total	Fees	Disbursements
Worked	8,547.00	8,547.00	0.00	75,781.50	75,781.50	0.00	195,089.50	195,089.50	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	35,600.50	35,600.50	0.00	114,439.00	114,439.00	0.00	182,050.57	182,050.57	0.00

11/09/23 12:11:30 PROFORMA STATEMENT FOR MATTER 392775.00003 (Winkler, Geoff - Receiver for J&J Consul) (Asset Recovery & Management)

Collected	35,600.50	35,600.50	0.00	114,439.00	114,439.00	0.00	182,050.57	182,050.57	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	8,547.00	8,547.00	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

11/09/23 12:11:31 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: 09/20/23

Matter Name: Investigation & Reporting

Proforma Number: 1244757

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		
07/03/23	9272649	Evaluate the Court orders concerning Receiver recommendations, follow-up with counsel concerning the discovery motion.	Zaro, David	0.40	218.00	218.00	WO	HD	TR	_____
07/05/23	9270756	Teleconference with D. Zaro regarding pending discovery and draft motion establishing discovery procedures (0.3); review materials transmitted by D. Zaro in connection with same (0.2); prepare revisions to draft motion and circulate to GT co-counsel for review and comment (0.7).	Del Castillo, Joshua	1.20	654.00	872.00	WO	HD	TR	_____
07/05/23	9272661	Further research/analysis of the rules governing discovery and protective order, advice to counsel (.4). Follow-up on the draft brief, email to counsel as to revisions (.4). Evaluate defendant inquiries related to the Wells Fargo turnover of accounts and email (.7). Call with counsel related to the Wells Fargo accounts, the report as to source of funds and defendants inquiry (.4).	Zaro, David	1.90	1,035.50	1,907.50	WO	HD	TR	_____
07/06/23	9275232	Evaluate emails and address the issues concerning the Wells Fargo discovery	Zaro, David	0.60	327.00	2,234.50	WO	HD	TR	_____

11/09/23 12:11:31 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		
		matters (.3). Emails with Receiver and counsel related to the Wells Fargo turnovers and related issues (.3).								
07/07/23	9272676	Revise SEC discovery requests and follow-up inquire to Receiver's office (0.5).	Del Castillo, Joshua	0.50	272.50	2,507.00	WO	HD	TR	_____
07/07/23	9277087	Emails with counsel, call to follow-up on the discovery issues concerning WFB and third party subpoenas, follow-up.	Zaro, David	0.60	327.00	2,834.00	WO	HD	TR	_____
07/11/23	9275322	Review and respond to correspondence regarding motion for protective order in context of Madsen filings and confer with AM counsel regarding same (0.5).	Del Castillo, Joshua	0.50	272.50	3,106.50	WO	HD	TR	_____
07/12/23	9276046	Emails with Receiver's office regarding interim report (0.4); emails with AM personnel regarding necessary language for report (0.5); review notes and AM files, and prepare draft language and transmit to Receiver's office and GT co-counsel for review and incorporation (1.6).	Del Castillo, Joshua	2.50	1,362.50	4,469.00	WO	HD	TR	_____
07/13/23	9277528	Confer with D. Zaro regarding Receiver's requested revisions to motion for protective order (0.3); prepare requested revisions and transmit to Receiver and co-counsel for review and discussion (0.4).	Del Castillo, Joshua	0.70	381.50	4,850.50	WO	HD	TR	_____
07/13/23	9281322	Prepare for/attend the meeting with Mr. Winkler/Mr. Hall and Ms. Hendricks related to receivership, pending issues (.5)	Zaro, David	0.50	272.50	5,123.00	WO	HD	TR	_____
07/17/23	9280181	Emails with Receiver's office and co-counsel regarding draft interim report and	Del Castillo, Joshua	0.50	272.50	5,395.50	WO	HD	TR	_____

11/09/23 12:11:31 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 related matters (0.5).	Timekeeper	Hours	Fees	Sum	Circle	Action		
07/20/23	9286529	Several emails/review of the Receiver memorandum and attend meeting with Receiver, counsel, Mr. Hall as to pending issues/matters.	Zaro, David	0.40	218.00	5,613.50	WO	HD	TR	_____
07/26/23	9289048	Review subpoena forwarded by Receiver and correspondence with counsel regarding same (0.5); teleconference with D. Zaro regarding same (0.2).	Del Castillo, Joshua	0.70	381.50	5,995.00	WO	HD	TR	_____
07/26/23	9294691	Evaluate email from the Receiver and subpoena direct to investors (.4). Analysis of issues concerning subpoena/emails to address Receiver response/approach and follow-up (.5).	Zaro, David	0.90	490.50	6,485.50	WO	HD	TR	_____
07/28/23	9291489	Emails with Receiver's office and AM personnel regarding review and revision of Receiver draft interim report (0.6); review and prepare revisions to interim report (1.4); review additional revisions from D. Zaro and incorporate (0.7); review and respond to inquiries regarding pending discovery and attend to related document assembly (0.9).	Del Castillo, Joshua	3.60	1,962.00	8,447.50	WO	HD	TR	_____
07/28/23	9294854	Revise draft narrative of Receiver's report, follow-up with several emails/call concerning further revisions to report.	Zaro, David	1.20	654.00	9,101.50	WO	HD	TR	_____
07/31/23	9294814	Confer with AM counsel and Receiver's office regarding pending discovery demands (0.3); revise and transmit motion for protective order to SEC fore meet and confer purposes (0.4).	Del Castillo, Joshua	0.70	381.50	9,483.00	WO	HD	TR	_____

11/09/23 12:11:31 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			
07/31/23	9296489	Email correspondence with client regarding Wells Fargo production; review prior emails with Wells Fargo's counsel regarding outstanding requests; draft follow-up email to Wells Fargo's counsel regarding same	Pham, Matt D.	0.90	400.50	9,883.50	WO	HD	TR	_____
08/02/23	9304259	Conference with Receiver counsel and follow-up to review outstanding discovery ad pending motion concerning the protective order/discovery limits and follow-up (.6).	Zaro, David	0.60	327.00	10,210.50	WO	HD	TR	_____
08/02/23	9330623	Review and analyze new productions from Wells Fargo and US Bank and draft email to client regarding same	Pham, Matt D.	1.30	578.50	10,789.00	WO	HD	TR	_____
08/03/23	9304449	Emails with counsel related to the WFB discovery and issues related to accounting and follow-up with Receiver counsel.	Zaro, David	0.30	163.50	10,952.50	WO	HD	TR	_____
08/07/23	9305115	Emails and teleconferences with AM attorneys regarding document review, anticipated productions, and associated discovery issues (1.1).	Del Castillo, Joshua	1.10	599.50	11,552.00	WO	HD	TR	_____
08/08/23	9330655	Draft email to client regarding Wells Fargo document production	Pham, Matt D.	0.20	89.00	11,641.00	WO	HD	TR	_____
08/10/23	9307557	Confer with AM attorney team regarding pending discovery and new procedures regarding document productions received for Receiver (0.5).	Del Castillo, Joshua	0.50	272.50	11,913.50	WO	HD	TR	_____
08/10/23	9311183	Emails/call among counsel and Receiver concerning pending discovery disputes with	Zaro, David	0.40	218.00	12,131.50	WO	HD	TR	_____

11/09/23 12:11:31 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			
08/11/23	9314486	Email/call with counsel related to records and discovery (.2). Email from Receiver related to relativity and follow-up to evaluate issues and respond accordingly (.6).	Zaro, David	0.80	436.00	12,567.50	WO	HD	TR	_____
08/11/23	9328983	Teleconference with D. Zaro regarding Receiver document management and production inquiry (0.2); review and respond to correspondence regarding same (0.3); follow-up with producing parties (0.7).	Del Castillo, Joshua	1.20	654.00	13,221.50	WO	HD	TR	_____
08/15/23	9311439	Review and respond to correspondence from Receiver's office regarding document requests and turnover and confer with AM counsel regarding same (0.3); prepare inquiries to bank counsel regarding Receiver proposal for document turnover (0.3).	Del Castillo, Joshua	0.60	327.00	13,548.50	WO	HD	TR	_____
08/16/23	9312179	Emails and teleconferences with bank counsel regarding pending document productions and related document production issues (1.0); follow-up voicemail to Receiver's office (0.1); emails with Receiver's office (0.3); attention to document management protocol (0.3).	Del Castillo, Joshua	1.70	926.50	14,475.00	WO	HD	TR	_____
08/16/23	9316665	Several emails/call with the Receiver counsel related to bank documents and subpoena issues.	Zaro, David	0.40	218.00	14,693.00	WO	HD	TR	_____
08/17/23	9330746	Draft email to client regarding Wells Fargo's document production (0.1); Phone call with client regarding issues with Wells Fargo's	Pham, Matt D.	0.50	222.50	14,915.50	WO	HD	TR	_____

11/09/23 12:11:31 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			
		production (0.4)								
08/21/23	9316890	Review inquiry from Receiver regarding follow-up for information from U.S. Bank and confer with AM counsel regarding same (0.3); review emails and notes regarding U.S. Bank production history (0.2).	Del Castillo, Joshua	0.50	272.50	15,188.00	WO	HD	TR	_____
08/22/23	9318205	Confer with M. Pham regarding Receiver inquiries and requests regarding recent and pending document productions and associated accounting matters (0.5); emails to bank counsel regarding productions (0.3).	Del Castillo, Joshua	0.80	436.00	15,624.00	WO	HD	TR	_____
08/22/23	9330787	Draft email to US Bank's counsel regarding account info request (0.1); Draft email to client regarding update on Wells Fargo production issues (0.3)	Pham, Matt D.	0.40	178.00	15,802.00	WO	HD	TR	_____
08/23/23	9319075	Review and respond to correspondence from M. Pham regarding apparent discovery dispute (0.2); review and respond to correspondence from Receiver's office regarding same (0.5); legal analysis in anticipation of demand letter to producing party (1.4).	Del Castillo, Joshua	2.10	1,144.50	16,946.50	WO	HD	TR	_____
08/24/23	9328459	Confer with J. Hall and M. Pham regarding recent Wells Fargo document production and processing and sorting issues (0.7).	Del Castillo, Joshua	0.70	381.50	17,328.00	WO	HD	TR	_____
08/24/23	9330800	Phone call with John Hall and Josh del Castillo regarding Wells Fargo account/production issue	Pham, Matt D.	0.20	89.00	17,417.00	WO	HD	TR	_____

11/09/23 12:11:31 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		
08/29/23	9324624	Confer with M. Pham regarding document management and review issues (0.4); follow-up regarding Wells Fargo production and review select documents in connection with inquiries from Receiver's office (1.1).	Del Castillo, Joshua	1.50	817.50	18,234.50	WO	HD	TR	_____
08/29/23	9329738	Analysis and determination of document productions in preparation for attorney review.	Peng, Simona	0.50	175.00	18,409.50	WO	HD	TR	_____
08/30/23	9326391	Confer with AM counsel and email to J. Hall re WF document review matters (0.8).	Del Castillo, Joshua	0.80	436.00	18,845.50	WO	HD	TR	_____
08/31/23	9328302	Teleconference with lender representatives regarding pending document productions and requests (0.7); email update to M. Pham (0.2); review and respond to correspondence from Receiver's office regarding same (0.2).	Del Castillo, Joshua	1.10	599.50	19,445.00	WO	HD	TR	_____
09/01/23	9334052	Emails with D. Zaro and co-counsel regarding status report to Court (0.3).	Del Castillo, Joshua	0.30	163.50	19,608.50	WO	HD	TR	_____
09/01/23	9335932	Follow-up with Receiver counsel concerning the US Bank records and documents, email concerning turnover (.4). Call with counsel related to the Receiver's report, the accounting and pending matters, follow-up meeting (.4).	Zaro, David	0.80	436.00	20,044.50	WO	HD	TR	_____
09/05/23	9335842	Follow-up emails to AM counsel and bank representatives regarding outstanding document productions (0.7); teleconferences regarding same (0.4); review materials associated with Wells Fargo recent production and prepare inquiry	Del Castillo, Joshua	1.70	926.50	20,971.00	WO	HD	TR	_____

11/09/23 12:11:31 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			
		to litigation technology support (0.6).								
09/05/23	9336014	Call/emails with counsel related to discovery and support for Receiver's report and accounting (.4).	Zaro, David	0.40	218.00	21,189.00	WO	HD	TR	_____
09/06/23	9335913	Follow-up regarding status of document review and load file requested by Receiver (0.5).	Del Castillo, Joshua	0.50	272.50	21,461.50	WO	HD	TR	_____
09/12/23	9339660	Emails and teleconferences with AM team regarding outstanding document inquiries from Receiver's office, necessary responses from banks, and related matters (0.7); follow-up correspondence to U.S. Bank and Wells Fargo regarding same (0.7); teleconference with counsel for U.S. Bank and prepare follow-up update to receivership team (1.0).	Del Castillo, Joshua	2.40	1,308.00	22,769.50	WO	HD	TR	_____
09/13/23	9349234	Emails/call with Receiver counsel related to Receiver's accounting issues and strategy to facilitate the Receiver direct communication with the bank and address production issues (.4).	Zaro, David	0.40	218.00	22,987.50	WO	HD	TR	_____
09/14/23	9366817	Review/evaluate pending accounting issues, call/email with counsel and Receiver regarding strategy to address banks reticence to cooperate with Receiver re: discovery and follow-up (.7).	Zaro, David	0.70	381.50	23,369.00	WO	HD	TR	_____
09/19/23	9347801	Review prior document productions to identify contact persons at banks which produced responsive documents due to Receiver's subpoena (.9).	Robichaud, James	0.90	400.50	23,769.50	WO	HD	TR	_____

11/09/23 12:11:31 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			
09/21/23	9350788	Review and respond to correspondence regarding document productions and discovery responses (0.5); follow-up emails regarding pending document demands (0.6).	Del Castillo, Joshua	1.10	599.50	24,369.00	WO	HD	TR	_____
09/21/23	9351309	Several email communications and filings concerning the SEC discovery and coordination as to productions.	Zaro, David	0.40	218.00	24,587.00	WO	HD	TR	_____
09/22/23	9351173	Follow-up emails to bank counsel regarding document production inquiries and requests (0.5); teleconferences regarding same (0.6).	Del Castillo, Joshua	1.10	599.50	25,186.50	WO	HD	TR	_____
09/28/23	9357322	Review Receiver's requests for additional bank documents and information (0.2); confer with Receiver's office regarding same (0.2); review subpoenas and production records (0.6); emails to bank representatives and AM counsel regarding turnover and production issues (0.6).	Del Castillo, Joshua	1.60	872.00	26,058.50	WO	HD	TR	_____
09/29/23	9358346	Review and respond to correspondence from Receiver's office regarding next interim report (0.2); review documents and notes in connection with preparation of sections for same (0.8).	Del Castillo, Joshua	1.00	545.00	26,603.50	WO	HD	TR	_____
09/29/23	9358412	Follow-up emails to M. Pham and bank representatives regarding pending document productions and sorting and review of same (0.4); prepare inquiry to Receiver's office regarding same (0.2).	Del Castillo, Joshua	0.60	327.00	26,930.50	WO	HD	TR	_____

11/09/23 12:11:31 PROFORMA STATEMENT FOR MATTER 392775.00004 (Winkler, Geoff - Receiver for J&J Consul) (Investigation & Reporting)

Proforma Summary

Timekeeper

Number	Timekeeper	Hours	Rate	Amounts
000313	Zaro, David	11.70	545.00	6,376.50
001842	Del Castillo, Joshua	33.80	545.00	18,421.00
002307	Peng, Simona	0.50	350.00	175.00
002510	Pham, Matt D.	3.50	445.00	1,557.50
002592	Robichaud, James	0.90	445.00	400.50
		50.40		\$26,930.50
Subtotal Fees				\$26,930.50
Discount				0.00
Total Fees				26,930.50
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 11/09/23

	Fiscal YTD		Disb.	Calendar YTD		Disb.	LTD		
	Total	Fees		Total	Fees		Total	Fees	Disbursements
Worked	38,350.00	38,350.00	0.00	115,816.50	115,816.50	0.00	208,473.50	208,473.50	0.00
Unbilled Adj	0.00	0.00	0.00	1,526.00	1,526.00	0.00	4,527.50	4,527.50	0.00
Billed	36,460.00	36,460.00	0.00	114,739.00	114,739.00	0.00	165,596.00	165,596.00	0.00
Collected	36,460.00	36,460.00	0.00	114,739.00	114,739.00	0.00	165,596.00	165,596.00	0.00
AR Write Off	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00
WIP	38,350.00	38,350.00							
Balance									
AR Balance	0.00	0.00	0.00						
Unalloc Payment	0.00								

11/09/23 12:11:31 PROFORMA STATEMENT FOR MATTER 392775.00004 (Winkler, Geoff - Receiver for J&J Consul) (Investigation & Reporting)

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

11/09/23 12:11:33 PROFORMA STATEMENT FOR MATTER 392775.00006 (Winkler, Geoff - Receiver for J&J Consul) (Sale, Disposition & Transfer of Assets)

Preliminary Billing Form

Billing Atty: 001842 - Del Castillo, Joshua
 Date of Last Billing: 09/20/23
 Proforma Number: 1244757
 Client/Matter Joint Group # 392775.1

Matter #: 392775.00006

Client Name: Winkler, Geoff - Receiver for J&J Consul
 Matter Name: Sale, Disposition & Transfer of Assets
 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	
07/19/23	9296407	Prepare 2 notices of termination of lis pendens for Sky Arc and Rockstream properties and draft email to escrow company regarding same	Pham, Matt D.	0.50	222.50	222.50	WO	HD	TR
08/03/23	9302643	Review stipulation to authorize sale of real property (0.2); review list of outstanding properties and prepare inquiries to Receiver's office and real property professionals regarding pending and anticipated sales (0.7).	Del Castillo, Joshua	0.90	490.50	713.00	WO	HD	TR
09/29/23	9358348	Review title materials and correspondence from U.S. Bank regarding Judd Huntington Beach property (0.6); follow-up emails to Receiver's office regarding same (0.2).	Del Castillo, Joshua	0.80	436.00	1,149.00	WO	HD	TR

Proforma Summary

Timekeeper Number	Timekeeper	Hours	Rate	Amounts
001842	Del Castillo, Joshua	1.70	545.00	926.50
002510	Pham, Matt D.	0.50	445.00	222.50
		<u>2.20</u>		<u>\$1,149.00</u>

11/09/23 12:11:33 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
				\$1,149.00
				0.00
				1,149.00
				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 11/09/23

	Fiscal YTD			Calendar YTD			LTD		
	Total	Fees	Disb.	Total	Fees	Disb.	Total	Fees	Disbursements
Worked	2,457.00	2,457.00	0.00	47,792.50	47,792.50	0.00	153,139.50	153,139.50	0.00
Unbilled Adj	0.00	0.00	0.00	0.00	0.00	0.00	782.30	780.80	1.50
Billed	12,262.50	12,262.50	0.00	94,631.70	94,631.70	0.00	149,901.70	149,901.70	0.00
Collected	12,262.50	12,262.50	0.00	94,631.70	94,631.70	0.00	149,901.70	149,901.70	0.00
AR Write Off	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00
WIP	2,457.00	2,457.00	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

11/09/23 12:11:33 PROFORMA STATEMENT FOR MATTER 392775.00006 (Winkler, Geoff - Receiver for J&J Consul) (Sale, Disposition & Transfer of Assets)

LLC; The Judd Irrevocable Trust; BJ Holdings LLC
Geoff B. Winkler
American Fiduciary Services LLC
715 NW Hoyt Street, Suite 4364
Portland, OR 97208

11/09/23 12:11:34 PROFORMA STATEMENT FOR MATTER 392775.00007 (Winkler, Geoff - Receiver for J&J Consul) (Pending Litigation)

Preliminary Billing Form

Billing Atty: 001842 - Del Castillo, Matter #: 392775.00007 Client Name: Winkler, Geoff - Receiver for J&J Consul
 Joshua
 Date of Last Billing: 06/30/23 Matter Name: Pending Litigation
 Proforma Number: 1244757
 Client/Matter Joint Group # 392775.1 Client Matter Number:

Fees for Matter 392775.00007.(Pending Litigation)

Trans Date	Index	Description of Service Rendered	Timekeeper	Hours	Fees	Sum	Circle	Action
08/03/23	9302630	Review updates and correspondence from Receiver's other counsel regarding pending and anticipated litigation and associated matters and respond to inquiries regarding same (0.7).	Del Castillo, Joshua	0.70	381.50	381.50	WO	HD TR

Proforma Summary

Timekeeper		Hours	Rate	Amounts
Number	Timekeeper			
001842	Del Castillo, Joshua	0.70	545.00	381.50
		0.70		\$381.50
Subtotal Fees				\$381.50
Discount				0.00
Total Fees				381.50
Total Disbursements				0.00

Attorney Billing Instructions

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

Billing Instructions

11/09/23 12:11:34 PROFORMA STATEMENT FOR MATTER 392775.00007 (Winkler, Geoff - Receiver for J&J Consul) (Pending Litigation)

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

Account Summary – As Of 11/09/23

	Fiscal YTD			Calendar YTD			LTD		
	Total	Fees	Disb.	Total	Fees	Disb.	Total	Fees	Disbursements
Worked	381.50	381.50	0.00	960.00	960.00	0.00	26,641.50	26,641.50	0.00
Unbilled Adj	0.00	0.00	0.00	0.00	0.00	0.00	623.00	623.00	0.00
Billed	0.00	0.00	0.00	9,357.00	9,357.00	0.00	25,637.00	25,637.00	0.00
Collected	0.00	0.00	0.00	9,357.00	9,357.00	0.00	25,637.00	25,637.00	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	381.50	381.50	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

11/09/23 12:11:35 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: 09/20/23

Matter Name: Third Party Claims & Recoveries

Proforma Number: 1244757

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		
07/12/23	9295148	Prepare and transmit update regarding Ecobattery draft complaint to J. del Castillo (.6).	Robichaud, James	0.60	267.00	267.00	WO	HD	TR	_____
08/07/23	9305116	Emails and confer with AM counsel regarding status of draft EcoBattery complaint (0.3); review draft document and prepare notes for discussion (0.5); analysis of additional prospective claims (0.6).	Del Castillo, Joshua	1.40	763.00	1,030.00	WO	HD	TR	_____
08/29/23	9324927	Emails and confer with M. Pham and J. Robichaud regarding Eco Battery (0.4); review documents and supplemental legal analysis in connection with Receiver's prospective claims (1.0).	Del Castillo, Joshua	1.40	763.00	1,793.00	WO	HD	TR	_____
09/11/23	9339487	Emails regarding status of Eco Battery complaint (0.3); confer with J. Robichaud and M. Pham regarding same (0.5).	Del Castillo, Joshua	0.80	436.00	2,229.00	WO	HD	TR	_____
09/12/23	9340875	Email follow-up with J. Robichaud regarding outstanding issues regarding Eco Battery complaint (0.2); review correspondence from D. Zaro, M. Farrell, and M. Pham	Del Castillo, Joshua	0.80	436.00	2,665.00	WO	HD	TR	_____

11/09/23 12:11:35 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		
		regarding Eco Battery (0.6).								
09/15/23	9344597	Outline facts and history for Ecobattery memo (.8); begin drafting memo (.6).	Robichaud, James	1.40	623.00	3,288.00	WO	HD	TR	_____
09/19/23	9348103	Emails with M. Pham regarding Eco Battery and other third party recovery matters (0.4).	Del Castillo, Joshua	0.40	218.00	3,506.00	WO	HD	TR	_____
09/20/23	9349103	Confer with J. Robichaud regarding equity investment analysis for EcoBattery and discuss issues raised by recent motion for instructions regarding note repayments from EcoBattery (1.1); review documents in connection with same (0.6).	Del Castillo, Joshua	1.70	926.50	4,432.50	WO	HD	TR	_____
09/20/23	9349121	Continue drafting Ecobattery memo for J. del Castillo in connection with prospective litigation (1.2).	Robichaud, James	1.20	534.00	4,966.50	WO	HD	TR	_____
09/21/23	9350135	Confer with J. del Castillo and M. Pham regarding Eco Battery (.5); additional revisions to Eco Battery memo (1.0).	Robichaud, James	1.50	667.50	5,634.00	WO	HD	TR	_____
09/21/23	9350189	Review memorandum regarding prospective remaining Eco Battery claims and confer with M. Pham and J. Robichaud regarding same (1.1).	Del Castillo, Joshua	1.10	599.50	6,233.50	WO	HD	TR	_____
09/21/23	9361843	Confer with Josh del Castillo and James Robichaud regarding outstanding Eco Battery claims	Pham, Matt D.	0.30	133.50	6,367.00	WO	HD	TR	_____
09/27/23	9355946	Confer with J. Robichaud regarding outstanding EcoBattery analysis and proposed update to Receiver (0.5).	Del Castillo, Joshua	0.50	272.50	6,639.50	WO	HD	TR	_____

11/09/23 12:11:35 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
001842	Del Castillo, Joshua	8.10	545.00	4,414.50
002510	Pham, Matt D.	0.30	445.00	133.50
002592	Robichaud, James	4.70	445.00	2,091.50
		13.10		\$6,639.50
Subtotal Fees				\$6,639.50
Discount				0.00
Total Fees				6,639.50
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 11/09/23

	Fiscal YTD			Calendar YTD			LTD		
	Total	Fees	Disb.	Total	Fees	Disb.	Total	Fees	Disbursements
Worked	6,906.50	6,906.50	0.00	43,612.00	43,612.00	0.00	93,643.00	93,643.00	0.00
Unbilled Adj	0.00	0.00	0.00	44.50	44.50	0.00	44.50	44.50	0.00
Billed	8,757.00	8,757.00	0.00	77,536.00	77,536.00	0.00	86,692.00	86,692.00	0.00
Collected	8,757.00	8,757.00	0.00	77,536.00	77,536.00	0.00	86,692.00	86,692.00	0.00
AR Write Off	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00
WIP	6,906.50	6,906.50	0.00						
Balance									
AR Balance	0.00	0.00	0.00						
Unalloc	0.00								
Payment									

11/09/23 12:11:35 PROFORMA STATEMENT FOR MATTER 392775.00009 (Winkler, Geoff - Receiver for J&J Consul) (Third Party Claims & Recoveries)

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

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: 8/30/2023

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 \$16,930.50

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
08/17/2023	INV #7092-01_14. Orig. Amount \$1,934.50.	1,934.50	16,930.50

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 8/17/2023
 Invoice Number 7092-01_14
 Client Number 7092
 Matter Number 01

RE: Receiver in Nevada Actions

BILL THROUGH DATE 7/31/2023

Date	Employee	Description	Hours	Rate	Amount
		PROFESSIONAL FEES			
7/5/2023	O Kelly	Review minute order re motions hearing (0.1) (22-cv-00612); review order re discovery and case schedule (0.3) (23-cv-00703)	0.4	145.00	58.00
7/6/2023	O Kelly	File notice of voluntary dismiss without prejudice of count IV (negligence) (0.7) (23-cv-00703)	0.7	145.00	101.50
7/7/2023	O Kelly	Draft/file notice of non-opposition to motion to transfer action to Judge Navarro (0.7) (23-cv-00703); review answer to complaint (0.1) (23-cv-00703)	0.8	145.00	116.00
7/7/2023	J Rickard	E-mail regarding notice of non opposition to motion to transfer in Wells Fargo action; review and revise draft of same	0.5	375.00	187.50
7/11/2023	O Kelly	Review order granting motion to transfer case to Judge G Navarro (0.1) (23-cv-00703); review clerk's minute order re case reassignment (0.1)(23-cv-00703)	0.2	145.00	29.00
7/11/2023	J Rickard	Review notice of judicial reassignment	0.3	375.00	112.50
7/20/2023	O Kelly	E-mails with client re lis pendens termination notices to be processed (0.1)(22-cv-1352); review/notarize/deliver 2 notices of termination of lis pendens to Stewart Title Company (2.3) (22-cv-1352)	2.4	145.00	348.00
7/20/2023	J Rickard	E-mail and phone calls regarding recording additional termination of lis pendens	0.5	375.00	187.50
7/24/2023	O Kelly	File response to Wells Fargo's status report (2:22-cv-00529) (0.5)	0.5	145.00	72.50
7/24/2023	J Rickard	Review for filing Receiver's response to status report in Class action litigation	0.3	375.00	112.50
7/26/2023	O Kelly	Review order granting motion to extend discovery, first request	0.3	145.00	43.50
7/27/2023	O Kelly	Review minute order setting motion for order to show cause hearing re contempt (22-cv-00612) (0.1); file stipulated discovery plan and proposed scheduling order (23-cv-00703) (0.5)	0.6	145.00	87.00
7/27/2023	J Rickard	Review draft proposed discovery plan in Wells Fargo action in anticipation of filing; e-mail regarding same	0.5	375.00	187.50
7/28/2023	O Kelly	Review order continuing status check hearing on motion to compel/order to show cause (22-cv-612)	0.1	145.00	14.50
7/31/2023	J Rickard	Review Receiver's fifth status report; review order denying proposed discovery plan in Wells Fargo action	0.7	375.00	262.50
7/31/2023	O Kelly	Review order denying proposed discovery plan/scheduling order (0.1) (23-cv-703)	0.1	145.00	14.50
		Subtotal			1,934.50

Total Current Invoice \$1,934.50

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: 9/25/2023

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 \$20,451.00

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
08/17/2023	INV #7092-01_14. Orig. Amount \$1,934.50.	1,934.50	16,930.50
09/20/2023	INV #7092-01_15. Orig. Amount \$3,520.50.	3,520.50	20,451.00

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 9/20/2023
 Invoice Number 7092-01_15
 Client Number 7092
 Matter Number 01

RE: Receiver in Nevada Actions

BILL THROUGH DATE 8/31/2023

Date	Employee	Description	Hours	Rate	Amount
8/2/2023	O Kelly	PROFESSIONAL FEES File motion to extend time to file amended scheduling order, first request (23-cv-703)	0.4	145.00	58.00
8/2/2023	J Rickard	Review for filing joint motion to extend time to submit discovery plan; emailing regarding same	0.5	375.00	187.50
8/3/2023	O Kelly	Review notices of deposition for J DiCaprio, K Monroe-Elliott, K Foreman and T Lippert	0.2	145.00	29.00
8/7/2023	O Kelly	Review order granting stipulation to extend deadline to file amended discovery plan/scheduling order (0.1) (23-cv-703); file joint motion to extend time to file amended discovery plan, second request (0.3) (23-cv-703)	0.4	145.00	58.00
8/7/2023	J Rickard	Review for filing second stipulation continuing deadline to submit discovery plan in Wells Fargo matter; emailing regarding same	0.4	375.00	150.00
8/8/2023	O Kelly	File stipulation to stay case to mediate (23-cv-703)	0.3	145.00	43.50
8/8/2023	J Rickard	Review for filing stipulation to stay for mediation in Wells Fargo matter; emailing regarding same	0.5	375.00	187.50
8/9/2023	O Kelly	Review order granting joint motion to extend time to file amended discovery plan, second request (0.1) (23-cv-703); review order setting hearing on stipulation to stay discovery (0.2) (23-cv-703); review order setting hearing on stipulation to stay discovery (0.1) (22-cv-529)	0.4	145.00	58.00
8/9/2023	J Rickard	Review order on stipulation to stay pending mediation	0.3	375.00	112.50
8/10/2023	O Kelly	Review stipulation and proposed order re request for liaison counsel at hearing (0.1) (22-cv-529)	0.1	145.00	14.50
8/11/2023	O Kelly	Review order allowing M Clark to appear remotely at hearing (0.1) (2:22-cv-00529)	0.1	145.00	14.50
8/11/2023	J Rickard	Review Wells Fargo's initial disclosures in Wells Fargo action	0.3	375.00	112.50
8/14/2023	O Kelly	Review joint status report (0.1) (2:22-cv-00529); review Wells Fargo's initial disclosures (0.1) (2:22-cv-00529); review G Winkler's initial disclosures (0.1) (2:22-cv-00529); file joint status report (0.5) (2:23-cv-00703)	0.8	145.00	116.00
8/14/2023	J Rickard	Review for filing report to court regarding mediation in Wells Fargo case	0.3	375.00	112.50
8/15/2023	O Kelly	Review minutes of hearing proceeding held on 8/15/23 (0.1) (2:22-cv-00529); review minutes of hearing proceeding held on 8/15/23 (0.1) (2:23-cv-00703)	0.2	145.00	29.00
8/15/2023	J Rickard	Prepare for and attend hearing on stipulation to stay pending mediation in Wells Fargo action	1.3	375.00	487.50
8/16/2023	O Kelly	Draft notice of subpoena/subpoena for OBERHEIDEN, P.C./review e-mails re same (0.8) (2:22-cv-00612)	0.8	145.00	116.00
8/16/2023	J Rickard	Conference call regarding Oberheiden subpoena; review same; drafting final for same; emailing regarding same	0.7	375.00	262.50
8/17/2023	A Barreras	Work on subpoena and notice of subpoena	1.0	145.00	145.00
8/17/2023	J Rickard	Draft revisions to Oberheiden subpoena; work on service for same	1.0	375.00	375.00
8/21/2023	A Barreras	E-mail exchanges with Legal Wings re service on Oberheiden's subpoena in Nevada	0.2	145.00	29.00
8/21/2023	J Rickard	Research regarding local service of subpoena on Oberheiden firm; research regarding Texas service for same; emailing regarding same	0.8	375.00	300.00
8/22/2023	A Barreras	E-mail exchanges with Legal Wings re service on Oberheiden's (0.1); e-mail to J. Rickard re same (0.1)	0.2	145.00	29.00

Total Current Invoice

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 9/20/2023
 Invoice Number 7092-01_15
 Client Number 7092
 Matter Number 01

RE: Receiver in Nevada Actions

BILL THROUGH DATE 8/31/2023

Date	Employee	Description	Hours	Rate	Amount
8/22/2023	J Rickard	Additional work on Oberheiden subpoena	0.4	375.00	150.00
8/24/2023	O Kelly	E-mails with J Rickard re hearing on motion for contempt (0.1) (22-cv-00612)	0.1	145.00	14.50
8/24/2023	A Barreras	Review e-mail from re service of subpoena duces tecum to Oberheiden	0.1	145.00	14.50
8/24/2023	J Rickard	Emailing update regarding Oberheiden service	0.3	375.00	112.50
8/30/2023	A Barreras	E-mail exchanges with Legal Wings re subpoena to Oberheiden	0.1	145.00	14.50
8/30/2023	J Rickard	Phone calls and emailing regarding Oberheiden subpoena	0.5	375.00	187.50
		Subtotal			3,520.50

Total Current Invoice \$3,520.50

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: 10/5/2023

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 \$15,574.80

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.	588.30	7,483.30
06/26/2023	INV #7092-01_12. Orig. Amount \$3,564.00.	550.62	8,033.92
07/07/2023	INV #7092-01_13. Orig. Amount \$1,515.50.	378.88	8,412.80
08/17/2023	INV #7092-01_14. Orig. Amount \$1,934.50.	1,934.50	10,347.30
09/20/2023	INV #7092-01_15. Orig. Amount \$3,520.50.	3,520.50	13,867.80
10/04/2023	INV #7092-01_16. Orig. Amount \$1,707.00.	1,707.00	15,574.80

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, IncLas Vegas, Nevada 89145
Telephone: (702) 835-6803
Facsimile: (702) 920-8669
Federal I.D. # 27-4465751Date 10/4/2023
Invoice Number 7092-01_16
Client Number 7092
Matter Number 01

RE: Receiver in Nevada Actions

BILL THROUGH DATE 9/30/2032

Date	Employee	Description	Hours	Rate	Amount
PROFESSIONAL FEES					
9/1/2023	A Barreras	Review minute order re hearing for motion for attorney fees	0.1	145.00	14.50
9/1/2023	J Rickard	Review minute order regarding motion for fees	0.2	375.00	75.00
9/5/2023	A Barreras	Review affidavit of service re subpoena to Oberheiden PC	0.1	145.00	14.50
9/6/2023	O Kelly	Review minute order re status hearing/update calendar (2:22-cv-00612)	0.1	145.00	14.50
9/6/2023	J Rickard	Review Receiver's status report on use of retained professionals	0.3	375.00	112.50
9/7/2023	J Rickard	Emailing with Oberheiden attorneys regarding subpoenas; conference calls regarding same; emailing regarding subpoena withdrawal	0.5	375.00	187.50
9/8/2023	A Barreras	Work on notice of withdrawal of subpoena to Oberheiden re Las Vegas address	1.3	145.00	188.50
9/8/2023	J Rickard	Review and revise final notice of subpoena withdrawal	0.2	375.00	75.00
9/11/2023	J Rickard	Emailing regarding upcoming status conference	0.3	375.00	112.50
9/12/2023	O Kelly	Review order granting stipulation and order to continue hearing on motion to compel/motion to stay (0.1) (2:22-cv-00612); review docket re upcoming hearings (0.2) (2:22-cv-00612)	0.3	145.00	43.50
9/14/2023	K Cannata	Prepare for status check hearing (0.4); attend same (0.5)	0.9	300.00	270.00
9/15/2023	O Kelly	Review minutes of status check hearing (2:22-cv-00612)	0.1	145.00	14.50
9/22/2023	J Rickard	Review deposition notices from counsel for Jeffrey Judd	0.2	375.00	75.00
9/27/2023	O Kelly	Review e-mails between counsel re extension to respond to Oberheiden, P.C. subpoena (2:22-cv-00612)	0.1	145.00	14.50
9/27/2023	J Rickard	Emailing regarding Oberheiden subpoena	0.3	375.00	112.50
9/29/2023	O Kelly	Review e-mails between counsel re extension to respond to Oberheiden, P.C. subpoena (2:22-cv-00612)	0.1	145.00	14.50
		Subtotal			1,249.50
					1,339.00
EXPENSES/COSTS					
9/1/2023		Legal Wings Invoice P-1990887		155.00	155.00
9/7/2023		Legal Wings Invoice P-1990888		213.00	213.00
		Subtotal			368.00

Total Current Invoice ~~\$1,707.00~~
\$1,617.50