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14 **IN THE UNITED STATES DISTRICT COURT**
15 **FOR THE DISTRICT OF NEVADA**

16 SECURITIES AND EXCHANGE
17 COMMISSION,

18 Plaintiff,

19 vs.

20 MATTHEW WADE BEASLEY, *et al.*,

21 Defendants,

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

23 Relief Defendants.
24

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

**MEMORANDUM OF FEES AND
COSTS PURSUANT TO COURT
ORDERS ON RECEIVER’S MOTION
TO FIND AARON GRIGSBY IN
CONTEMPT FOR FAILURE TO
COMPLY WITH THIS COURT’S
ORDERS (ECF No. 584) AND
MOTION FOR ORDER DIRECTING
THE TURNOVER OF
RECEIVERSHIP PROPERTY FROM
AARON GRIGSBY (ECF No. 585)**

25 Comes now, Geoff Winkler, the Court-appointed Receiver (the “Receiver”), by and through
26 his counsel of record the law firm of Greenberg Traurig, LLP (“Greenberg Traurig” or “GT”), and
27 hereby submits this Memorandum of Fees and Costs Pursuant to Court Orders on Receiver’s
28 Motion to Find Aaron Grigsby in Contempt for Failure to Comply With This Court’s Orders

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1 (ECF No. 584) and Motion for Order Directing the Turnover of Receivership Property From Aaron
2 Grigsby (ECF No. 585) (the “Memorandum of Fees”).

3 This Memorandum of Fees is based on the below Points and Authorities, the declaration
4 attached hereto, the pleadings and papers on file herein, and such other and further information as
5 may be presented to the Court at the time of any hearing.

6 DATED this 5th day of January, 2024.

7 **GREENBERG TRAUERIG, LLP**

8 */s/ Kara B. Hendricks*

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16 **MEMORANDUM OF POINTS AND AUTHORITIES**

17 **I. INTRODUCTION AND SUMMARY OF BACKGROUND**

18 This memorandum of fees represents the culmination of seventeen (17) months of efforts
19 devoted toward obtaining attorney Aaron Grigsby’s compliance with the foundational orders of this
20 case. Since his appointment in June 2022, the Receiver has worked with numerous defendants,
21 third parties, and counsel, to locate and recover assets belonging to the Receivership Estate.
22 Generally, these efforts have been met with cooperation and a lack of resistance. However, with
23 respect to Mr. Grigsby and his client, Paula Beasley, the story was not quite as simple.

24 Following his appointment, Receiver Geoff Winkler (the “Receiver”) commenced his
25 efforts to locate and recover the substantial assets comprising the Receivership Estate. The scope
26 of the Receivership Estate was established through the Court’s entry of a Temporary Restraining
27 Order (ECF No. 3), the terms of which were later affirmed via the April 21, 2022 Order Entering
28 Preliminary Injunction, Asset Freeze, and Other Equitable Relief (the “Asset Freeze”)
(ECF No. 56). Additional restrictions were implemented through the Order Appointing Receiver
(ECF No. 88) which required, among other things, prohibited the dissipation of Receivership

1 Property and expressly required cooperation with the Receiver to facilitate his duties and
2 obligations. *See* ECF No. 88 at ¶¶ 7, 17, 29.

3 From the outset, the Receiver was aware that Paula Beasley¹, continued to hold assets of
4 significant value and continued to reside in the Beasley residence, located at 5475 Ruffian Road,
5 Las Vegas, NV (the “Ruffian Property”). Just six days after his appointment, the Receiver met with
6 Paula Beasley at the Ruffian Property and took possession of several vehicles.² However, at that
7 time, a 2020 Mercedes Benz G-Wagon (the “G-Wagon”) was nowhere to be found. Ms. Beasley
8 and Mr. Grigsby thereafter represented that the G-Wagon would be turned over and that Paula
9 would vacate the Ruffian Property in July 2022, with an agreement in place for Paula to reside in a
10 less expensive home owned by the Beasleys. However, neither of those representations were
11 accurate.³

12 As the Receiver continued his attempts to recover the G-Wagon and the Ruffian Property,
13 the Receiver discovered, contrary to Ms. Beasley and Mr. Grigsby’s representations, the G-Wagon
14 had actually been sold. When the Receiver delved into the status of the G-Wagon and/or the
15 proceeds from the sale, a trove of misconduct was uncovered, revealing that Ms. Beasley, with the
16 assistance and/or guidance of Mr. Grigsby not only disposed of the G-Wagon for below market
17 value, but had also facilitated the dissipation of hundreds of thousands of dollars that should have
18 been turned over to the Receiver.⁴ After attempts to obtain the documents and information
19 necessary to demonstrate the status of the Receivership Assets in question failed, the Receiver filed
20 a Motion to Compel or Alternative Motion for Order to Show Cause Why Paula Beasley and Aaron
21 Grigsby Should Not be Held in Contempt For Failure to Comply With This Court’s Orders and
22 Request for Turnover of Mercedes G-Wagon or Value of Same (the “Motion to Compel”)

23 _____
24 ¹ Paula Beasley is the ex-wife of Defendant Matthew Beasley. Paula and Matthew were divorced in, what
25 the court referred to as, a “fast-track” divorce, facilitated by Mr. Grigsby on behalf of both spouses.

26 ² *See* ECF No. 333, A thorough recap of the Receiver’s initial efforts with respect to Paula Beasley was
27 included in the Receiver’s Motion to Compel.

28 ³ Ms. Beasley finally moved out of the Ruffian Property and the Receiver took possession in August 2022.
As a result, the Receiver’s second and third motions pertaining to Mr. Grigsby did not address the turnover
of the Ruffian Property.

⁴ As discussed in the Receiver’s Motions, the funds in question were derived from the sale of the G-Wagon
as well as the sale of a Ferrari and an Aston Martin.

1 (ECF Nos. 333, 334). Following the hearing on the Receiver’s Motion to Compel, Magistrate Judge
2 Youchah ordered a significant production of documents and information to be made by Mr. Grigsby
3 and further directed the turnover of any Receivership assets in the possession of Mr. Grigsby and/or
4 Ms. Beasley.

5 After Mr. Grigsby failed to comply with the Court’s order on the Motion to Compel, the
6 Receiver once again came before the court and filed a Motion for Order to Show Cause Why Paula
7 Beasley and Aaron Grigsby Should Not be Held in Contempt for Failure to Comply With this
8 Court’s Orders and Alternative Motion for Turnover (the “Motion for Order to Show Cause”)
9 (ECF Nos. 498, 499). The Motion for Order to Show Cause demonstrated that not only had
10 Mr. Grigsby failed to comply with the Court’s orders but also that Mr. Grigsby had facilitated the
11 waste of hundreds of thousands of dollars of Receivership funds, which he controlled and/or passed
12 through his firm’s IOLTA account. Worse, through the briefing on the Motion for Order to Show
13 Cause, it became clear that Mr. Grigsby, while purportedly acting as counsel for both Paula and
14 Matthew Beasley in their divorce, coordinated the payment to himself of more than \$110,000 on
15 Matthew Beasley’s credit cards, despite his knowledge that Mr. Beasley would have no means to
16 repay that debt. Graciously, Judge Youchah provided Mr. Grigsby one last opportunity to turnover
17 the funds or demonstrate that the assets were purchased with something other than Receivership
18 Funds. However, Judge Youchah’s order was paired with a warning that if he could not do so and
19 if he failed to turn over the funds in question, there would be a finding of contempt.

20 Mr. Grigsby’s time for compliance came and went, with no new production apart from the
21 surrender of a mere \$20.88, purportedly representing the remaining funds in Paula Beasley’s trust
22 account. By September 2023, Mr. Grigsby had withdrawn from his representation of Paula Beasley
23 and the contempt proceedings commenced against Mr. Grigsby individually.⁵ On October 6, 2023,
24 the Receiver filed a Motion to Find Aaron Grigsby in Contempt for Failure to Comply With This

26 ⁵ On September 18, 2023, Mr. Grigsby filed an Emergency Motion to Withdraw as Counsel of Record for
27 Paula Beasley (ECF No. 573) which was granted by this Court the following day. ECF No. 574. Following
28 Mr. Grigsby’s withdrawal from his representation of Paula Beasley, the Receiver segregated his efforts
toward Grigsby and Beasley. The Receiver has kept this court apprised of the status of Paula Beasley’s
compliance through periodical filings on the same. ECF No. 580, 597, 610.

1 Court's Orders (the "Motion for Contempt") and on October 9, 2023, filed a Motion for Order
2 Directing the Turnover of Receivership Property From Aaron Grigsby (the "Turnover Motion")
3 (collectively, the Motion for Contempt and the Turnover Motion are referred to as the "Contempt
4 Motions").

5 The Contempt Motions came before the Court for hearing on December 13, 2023, but
6 Mr. Grigsby failed to appear. ECF No. 616. As a result, Mr. Grigsby's appearance was ordered
7 for December 14, 2023, at which time the hearing on the Contempt Motions continued. *Id.* At the
8 conclusion of the December 14, 2023, hearing, the Court found Mr. Grigsby in contempt, directing
9 the turnover of \$405,302.40 to be accompanied by a per diem fine of \$50 beginning on the first day
10 of noncompliance, with the amount doubling every third day, and an award of attorney's fees, to
11 be established by the instant Memorandum of Fees. ECF Nos. 617, 621.

12 II. ARGUMENT

13 The background of this dispute needs little introduction, as the briefing on this dispute has
14 spanned more than 200 pages, exclusive of exhibits, and has been the subject of four (4) hearings.⁶
15 As fully presented to this Court, Mr. Grigsby has, for the better part of seventeen (17) months
16 caused the Receivership to needlessly expend valuable resources seeking the turnover of assets that
17 should have occurred immediately upon the entry of the Asset Freeze and the Appointment Order.
18 In other words, given that there was no legal, or logical, basis for Mr. Grigsby's continued refusal
19 to comply, all efforts devoted to recovering the assets held and/or controlled by Mr. Grigsby were
20 unnecessary and are subject to repayment. For the reasons stated herein, the Receiver respectfully
21 requests an award of attorney's fees representative of all efforts devoted toward obtaining
22 Mr. Grigsby's compliance with the Asset Freeze and Appointment Order.

23 a. The Receiver Requests Fees and Costs in the Amount of \$146,586.45

24 An award of reasonable attorney's fees is based on the "lodestar" calculation set forth in
25 *Hensley v. Eckerhart*, 461 U.S. 424, 433, 103 S. Ct. 1933 (1983). *Nev. Prop. 1 v. Kiwibank Ltd.*,
26 2020 U.S. Dist. LEXIS 172862, *6-7 (D. Nev. Sept. 21, 2020) (citing *Fischer v. SJB-P.D., Inc.*,
27 214 F.3d 1115, 1119 (9th Cir. 2000) (applying *Hensley*)). The Court "must first determine a

28 ⁶ See ECF Nos. 333, 334, 350, 363, 498, 499, 505, 514, 584, 590, 595, 585, 591, and 596.

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1 reasonable fee by multiplying ‘the number of hours reasonably expended on the litigation’ by ‘a
 2 reasonable hourly rate.’” *Nev. Prop. 1*, 2020 U.S. Dist. LEXIS 172862, 6-7 (quoting *Hensley*, 461
 3 U.S. at 433). Next, the Court “must decide whether to adjust the lodestar calculation based on an
 4 evaluation of the factors articulated in *Kerr v. Screen Extras Guild, Inc.*, 526 F.2d 67, 70 (9th Cir.
 5 1975), which have not been subsumed into the lodestar calculation.” *Nev. Prop. 1*, 2020 U.S. Dist.
 6 LEXIS 172862, 6-7 (citing *Fischer*, 214 F.3d at 1110). The *Kerr* factors are:

- 7 (1) the time and labor required, (2) the novelty and difficulty of the
- 8 questions involved, (3) the skill requisite to perform the legal service
- 9 properly, (4) the preclusion of other employment by the attorney due to
- 10 acceptance of the case, (5) the customary fee, (6) whether the fee is fixed or
- 11 contingent, (7) time limitations imposed by the client or the circumstances,
- 12 (8) the amount involved and the results obtained, (9) the experience,
- 13 reputation, and ability of the attorneys, (10) the “undesirability” of the case,
- 14 (11) the nature and length of the professional relationship with the client,
- 15 and (12) awards in similar cases.

14 *Kerr*, 526 F.2d at 70.

15 “Once calculated, the lodestar is presumptively reasonable.” *Nev. Prop. 1*, 2020 U.S. Dist.
 16 LEXIS 172862, *6-7 (citing *Pennsylvania v. Delaware Valley Citizens’ Council for Clean Air*, 483
 17 U.S. 711, 728, 107 S. Ct. 3078 (1987)). “Only in ‘rare and exceptional cases’ should a court adjust
 18 the lodestar figure.” *Id.* (quoting *Van Gerwen v. Guar. Mut. Life Co.*, 214 F.3d 1041, 1045 (9th
 19 Cir. 2000) and citing *Fischer*, 214 F.3d at 1119 n. 4 (stating that the lodestar figure should be
 20 adjusted only in rare and exceptional cases)).

21 In this case, the Receiver has employed three (3) firms, including Greenberg Traurig, LLP,
 22 to assist him in fulfilling his obligations under the Appointment Order. With respect to the efforts
 23 dedicated toward Mr. Grigsby, the instant Memorandum of Fees represents the efforts of the
 24 Receiver and Greenberg Traurig between July 2022 and January 2024.⁷ In total, the Receiver has
 25 incurred \$129,348.29 in reasonable and necessary attorney’s fees seeking Grigsby’s cooperation
 26 with this Court’s orders, inclusive of efforts to resolve the dispute without judicial intervention.⁸

27 _____
 28 ⁷ **Exhibit 1**, Declaration of Kara B. Hendricks (the “Hendricks Decl.”) at ¶ 15.

⁸ **Exh. 1**, Hendricks Decl. at ¶ 31.

1 *See Clark v. City of L.A.*, 803 F.2d 987, 992 (9th Cir 1986) (holding that fees incurred for work on
2 fee petitions are compensable); *Camacho v. Bridgeport Fin., Inc.*, 523 F.3d 973, 981 (9th Cir. 2008)
3 (finding “it would be inconsistent to dilute a fees award by refusing to compensate attorneys for the
4 time they reasonably spent in establishing their rightful claim to the fee.”).

5 Additionally, as set forth herein, the Receiver seeks reimbursement of the fees and expenses
6 incurred by American Fiduciary Services (“AFS”) for efforts to recover assets from Paula Beasley
7 and Mr. Grigsby. To date, AFS has incurred \$11,998.00 in fees and \$5,240.16 in expenses for the
8 Receiver and his team’s work.⁹ As such, the Receiver seeks an award \$17,238.16 for the fees and
9 expenses incurred by AFS.

10 **b. The Time and Labor Required**

11 The Receiver’s efforts with respect to Mr. Grigsby began shortly after his appointment in
12 June 2022.¹⁰ As stated in prior filings, through preliminary communications, the Receiver
13 understood that Mr. Grigsby would be complicit in the turnover of all Receivership Property in his
14 and/or Paula Beasley’s possession. However, as days and weeks passed, it became increasingly
15 clear that Mr. Grigsby was not interested in cooperating with the Receiver as required by Court
16 order,¹¹ opting instead for a course of resistance, misrepresentations, and denial. The result was
17 the significant expenditure of resources on the part of the Receiver—efforts that were unnecessary
18 as the Receiver should not have been forced to incur any fees in the pursuit of compliance from
19 Mr. Grigsby, a Nevada licensed attorney. Judge Youchah noted as such during the hearing on the
20 Motion to Compel when she stated: “*These are violations—knowing violations of federal court*
21 *orders for a licensed attorney. That’s a problem, sir, and I think you need to be really careful.*”
22 ECF No. 416 at p. 29:9-12.

23 As discussed at length in the Motion to Compel, Mr. Grigsby served as counsel for both
24 Matthew and Paula Beasley in their fast-track divorce, evidencing a clear understanding of the
25 Beasley’s impending legal issues. *See* ECF No. 333 at p. 15-16. Yet, despite this knowledge, and

26 ⁹ **Exhibit 2**, Declaration of Geoff Winkler (the “Winkler Decl.”) at ¶ 9.

27 ¹⁰ A detailed description of the Receiver’s efforts from July through October 2022 can be found in the
Motion to Compel. ECF No. 333.

28 ¹¹ *See* ECF No. 88.

1 his acknowledged receipt and understanding of the Asset Freeze, Mr. Grigsby knowingly violated
2 the Court’s orders by coordinating the dissipation of the funds derived from the previous sale of a
3 Ferrari and an Aston Martin and further facilitated and coordinated the sale of the G-Wagon—the
4 funds from which remain to be seen. All of this was done with an admitted clear understanding of
5 the Court’s orders prohibiting such dissipation of Receivership Assets.¹² Worse, Mr. Grigsby,
6 while purportedly representing Matthew Beasley in the divorce, facilitated and accepted payment
7 to himself in the amount of \$110,500.00 on Matthew Beasley’s credit cards with an undeniable
8 knowledge that Matthew would never be able to repay that debt. After the conclusion of the above
9 transactions, Mr. Grigsby could have communicated with the Receiver and worked to remedy the
10 issues he was facing, but he didn’t. Instead, Mr. Grigsby made material misrepresentations to the
11 Receiver, the SEC, and the Court as to the location and status of these assets and further implicated
12 himself by violating two subsequent clear orders of the Court, each of which were expressly
13 intended to provide an “opportunity to come clean.” *See* ECF No. 416 at 42:3-6. This resulted in
14 unnecessary motion practice and served as a significant drain on the Receivership Estate. For that
15 reason, the instant Memorandum of Fees requests all fees incurred in pursuing Mr. Grigsby and
16 Ms. Beasley’s compliance with this Court’s orders.

17 Inclusive of the Receiver’s efforts directed toward Mr. Grigsby bringing the filing a motion
18 with this Court, counsel for the Receiver allocated 371.3 hours toward recovering the Receivership
19 property.¹³ This time included diligent efforts to obtain Mr. Grigsby’s compliance without court
20 intervention, including repeat communications, meetings, an investigation into the status of the
21 assets, and the issuance of subpoenas to third parties to obtain documents and information related
22 to the sale of the G-Wagon.

23 Unfortunately, all efforts in this respect were for naught as Mr. Grigsby exhibited a pattern
24 of blatant refusal to turnover the assets or the documents and information pertaining to the same
25 while simultaneously leading the Receiver to believe the G-Wagon was still in his and/or
26 Ms. Beasley’s possession when, in fact, it had already been sold. Following prolonged efforts on

27 _____
12 *See* ECF No. 416 at p. 28:20-29:12.

28 ¹³ **Exh. 1**, Hendricks Decl. at ¶ 19.

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1 the part of the Receiver, the Receiver was left with no option but to move this court for an order
2 compelling Mr. Grigsby’s compliance, a request that was granted by this Court.

3 However, a clear order from this Court was apparently not enough to convince Mr. Grigsby.
4 Despite multiple extensions from the Receiver, Mr. Grigsby produced a set of documents that not
5 only failed to comply with the Court’s orders but further wasted Receivership resources as the
6 production required a substantial amount of time to sort, organize and de-duplicate the documents
7 before an analysis could even be performed.¹⁴ In other words, Mr. Grigsby’s lack of care caused
8 the Receiver to further incur needless attorney’s fees and costs.¹⁵ After the Receiver was able to
9 analyze the documents, the determination was made that the Mr. Grigsby had not complied and a
10 second motion was warranted. On April 13, 2023, the Receiver filed the Motion for Order to Show
11 Cause. ECF Nos. 498, 499. The Motion for Order to Show Cause resulted in a second order from
12 the Court for Mr. Grigsby’s compliance which Grigsby, again, failed to satisfy. As such, in October
13 2023, the Receiver moved for contempt, filing the Contempt Motions.

14 In sum, over the course of seventeen months, Mr. Grigsby knowingly violated, at a
15 minimum, four (4) separate and distinct orders from the Court, causing the Receiver to
16 unnecessarily allocate 371.3 hours to obtaining Mr. Grigsby’s compliance with orders dating back
17 to April 2022.

18 ///

19 ///

20 ///

21 ///

22 ///

23 _____
24 ¹⁴ See ECF Nos. 498, 499 (discussing the Receiver’s efforts to sort Mr. Grigsby’s production and filing,
25 under seal, the production in its entirety). The lack of organization was noted by Magistrate Judge Youchah
when she stated “I am not a pig searching for truffles...So if I missed one, I admit that. But that’s not my
obligation.” ECF No. 568 at p. 12:6-8.

26 ¹⁵ See e.g. ECF Nos. 333, 334, 498, 499, 584 and 585 (collectively, the “Receiver’s Motions”). In fact, the
27 Receiver opted to submit Mr. Grigsby’s entire production, as received, under seal in connection with the
28 Motion for Order to Show Cause Why Paula Beasley Should Not be Held in Contempt for Failure to Comply
With This Court’s Orders and Alternative Motion for Turnover, to demonstrate for the Court the manner in
which the documents were received. (ECF Nos. 500 - 502). During the August 25, 2023 hearing on the
matter, Magistrate Judge Youchah noted: “I am not a pig searching for truffles.” (ECF No. 568 at p. 12:6.).

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1 With respect to only court filings, the Receiver has incurred fees in the drafting of:

- 2 1. The Motion to Compel;¹⁶
- 3 2. The Receiver’s Reply in Support of the Motion to Compel;¹⁷
- 4 3. The Motion for Order to Show Cause;¹⁸
- 5 4. The Receiver’s Reply in Support of the Motion for Order to Show
- 6 Cause;¹⁹
- 7 5. The Motion for Contempt;²⁰
- 8 6. The Motion for Turnover;²¹
- 9 7. The Receiver’s Reply in Support of the Motion for Contempt;²²
- 10 8. The Receiver’s Reply in Support of the Motion for Turnover;²³

11 Additionally, the Receiver incurred fees in the preparation and participation in hearings on
12 the above motions on December 16, 2022, August 25, 2023, December 13, 2023 and December 14,
13 2023.²⁴ All of the above efforts were unnecessary given Mr. Grigsby’s understanding of the
14 situation at hand and the Receiver’s gracious efforts to take the path of least resistance. Yet, more
15 than 17 months after first contacting Mr. Grigsby, the Receiver still awaits any of the funds and/or
16 property at issue. In short, the Receivership has been substantially devalued solely by the conduct
17 of Mr. Grigsby.

18 While the efforts directed toward Mr. Grigsby were substantial, the Receiver and his counsel
19 took care not to overstaff this matter and made every effort to minimize fees to the extent possible.²⁵
20 Greenberg Traurig allocated its efforts in this matter as efficiently as reasonably possible with
21

22 ¹⁶ Filed October 21, 2022.

23 ¹⁷ Filed November 15, 2022.

24 ¹⁸ Filed April 13, 2023.

25 ¹⁹ Filed May 4, 2023.

26 ²⁰ Filed October 6, 2023.

27 ²¹ Filed October 9, 2023.

28 ²² Filed October 27, 2023.

²³ Filed October 30, 2023.

²⁴ **Exh. 1**, Hendricks Decl. at ¶ 22.

²⁵ *Id.* at ¶ 23.

1 Associate Christian Spaulding accounting for 197.1 hours, representing 53% of the 371.3 total
 2 hours worked.²⁶ Mr. Spaulding did the majority of the review of documents, research and drafting
 3 associated with the Motion to Compel, the Motion for Order to Show Cause, the Motion for
 4 Contempt and the Motion for Turnover.²⁷ Kara Hendricks managed the majority of the
 5 communications with third-parties, including Mr. Grigsby and his counsel and contributed
 6 significantly to the drafting of the Receiver’s Motions, contributing 98.6 hours.²⁸ Additionally,
 7 Associate Kyle Ewing contributed to the analysis and drafting of the Motions as well as research,
 8 investigation and strategy on the same, totaling 36 hours.²⁹ The remainder of the hours spent are
 9 attributed to work performed by the paralegals at Greenberg Traurig, accounting for 39.6 hours
 10 allocated to Paralegals Cynthia Ney and Steph Morrill.³⁰ Ms. Ney and Ms. Morrill assisted
 11 Mrs. Hendricks, Mr. Spaulding, and Mr. Ewing in strategizing and completing the filings in this
 12 matter.³¹ As can be seen from the billing entries on this matter, Greenberg Traurig took care to
 13 ensure an efficient use of resources and that efforts were not duplicated.³² Given the foregoing and
 14 in light of the circumstances giving rise to this matter, the 371.3 hours spent by Greenberg Traurig
 15 were reasonable and appropriate.³³

16 In addition, the Receiver seeks reimbursement of the fees and expenses incurred by
 17 American Fiduciary Services (“AFS”) for efforts to recover assets from Paula Beasley and
 18 Mr. Grigsby.³⁴ Specifically, AFS devoted 36.3 hours toward working with Mr. Grigsby and
 19 attempting to recover the Receivership assets in question.³⁵ AFS’s efforts in this respect included,
 20 among other things, communications and meetings with Mr. Grigsby; analyzing and reviewing
 21

22 ²⁶ **Exh. 1**, Hendricks Decl. at ¶ 24.

23 ²⁷ *Id.* at ¶ 25.

24 ²⁸ *Id.* at ¶ 26.

25 ²⁹ *Id.* at ¶ 27.

26 ³⁰ *Id.* at ¶ 28.

27 ³¹ **Exh. 1**, Hendricks Decl. at ¶ 29.

28 ³² *Id.* at ¶ 30.

³³ *Id.* at ¶ 33.

³⁴ **Exh. 2**, Winkler Decl. at ¶¶ 5-6.

³⁵ *Id.* at ¶ 7.

1 documents and information pertaining to the assets in question; reviewing, strategizing and
 2 providing feedback on motions; and attending hearings on each motion.³⁶ Additionally, AFS
 3 incurred \$5,240.16 in travel, lodging, and related expenses traveling to Las Vegas for meetings with
 4 Mr. Grigsby and to attend the hearings on the motions.³⁷ In total, AFS incurred \$11,998.00 in
 5 reasonable and necessary fees and \$5,240.16 in expenses.³⁸ As such, the Receiver requests an
 6 award of \$17,238.16 for the fees and expenses incurred by AFS for their efforts in seeking
 7 Mr. Grigsby's compliance and the turnover of the assets in question. Given the nature and duration
 8 of this dispute, the fees and costs incurred by AFS are reasonable and were necessarily incurred.³⁹

9 **c. The Novelty and Difficulty of the Questions Involved**

10 In general, proceedings in an equitable receivership are inherently complex. *See SEC v.*
 11 *Hardy*, 803 F.2d 1034, 1037 (9th Cir. 1986) (finding the district court has broad powers and wide
 12 discretion to determine the appropriate relief in an equity receivership because most receiverships
 13 involve multiple parties and complex transactions); *see also Sec. & Exch. Com. v. W. L. Moody &*
 14 *Co., Bankers (Unincorporated)*, 374 F. Supp. 465, 486 (S.D. Tex. 1974) ("An equitable
 15 receivership is by its very nature, a legally complex process"). The matters herein are no
 16 different. Indeed, the proceedings giving rise to this Memorandum of Fees consist of detailed
 17 investigations, third party discovery, the review and analysis of documents, substantial research
 18 and review of applicable authority governing the Receiver's ability to pursue this matter, and the
 19 drafting of hundreds of pages of briefing. These efforts reached multiple non-parties, their counsel,
 20 business, and government entities.⁴⁰ The Receiver's efforts in this respect were made in the interest
 21 of preserving the Receivership Assets and to further this Court's administration of the Receivership
 22 Estate for the benefit of the creditors.

23 _____
 24 ³⁶ **Exh. 2**, Winkler Decl. at ¶ 6.

25 ³⁷ *Id.* at ¶ 8.

26 ³⁸ *Id.* at ¶ 9.

27 ³⁹ *Id.* at ¶ 11.

28 ⁴⁰ As discussed in prior briefings, the Receiver subpoenaed records from individuals and entities to whom the assets in question flowed. Additionally, inquiries with the Department of Motor Vehicles were warranted as there were questions of how the G-Wagon could have been sold with the FBI in possession of the title. *See* ECF No. 333.

1 The fees incurred were necessitate by Mr. Grigsby's glaring failure to comply.
 2 Mr. Grigsby's unjustified refusal to comply is particularly egregious in light of the fact that
 3 numerous other non-parties have either fully complied or taken the proper steps with this Court to
 4 assert their desire to retain Receivership Property.⁴¹ Yet, Mr. Grigsby opted not to do so. Instead,
 5 Mr. Grigsby spent more than a year telling part of the story while delaying and kicking the can
 6 down the road as long as he could. The result was the Receiver's expenditure of hundreds of hours
 7 pursuing the turnover of funds and property that should have been turned over in mid-2022.

8 The severity of Mr. Grigsby's failures can be inferred from the Court's order granting the
 9 Receiver's Motion for Contempt and the Motion for Turnover in which this Court noted:

10 "Grigsby was given more than a year to comply with the Receivership Order
 11 (ECF No. 88), over a year to comply with Judge Youchah's order granting the
 12 Receiver's motion to compel, and four months to comply with Judge Youchah's
 13 second order granting the Receiver's motion to compel. **Grigsby's slow, or outright**
 14 **refusal, to fully cooperate with the Receiver caused unnecessary and multiple court**
 15 **proceedings. More importantly, Grigsby's action (or inaction) undermined and**
 16 **obstructed the primary purpose of equity receivership, which is 'to promote orderly**
 17 **and efficient administration of the estate by the district court for the benefit of the**
 18 **creditors."**

17 ECF No. 621 at p. 25:12-20. (emphasis added).

18 Given the length of time covered by these proceedings, the Receiver's efforts can be divided
 19 into seven (7) distinct categories:

- 20 1. Those related to the Receiver's initial communications and efforts
with Mr. Grigsby;
- 21 2. Those related to the Receiver's Motion to Compel;
- 22 3. Those related to the Receiver's efforts following the Motion to
Compel;
- 23 4. Those related to the Receiver's Motion for Order to Show Cause;
- 24 5. Those related to the Receiver's efforts following the Motion for
Order to Show Cause;
- 25 6. Those related to the Motion for Contempt and the Motion for
Turnover; and

26 _____
 27 ⁴¹ Previously, the Receiver has encountered third parties and law firms seeking to retain the funds paid to
 28 them by Defendants in the action. Generally, those parties took the proper steps by moving, *albeit*
unsuccessfully, to retain those funds. *See e.g.* ECF Nos. 235, 318. Mr. Grigsby made no such attempt here.
 Instead, he opted for self-help by concealing his actions, resulting in significant waste to the Receivership.

1 7. Those related to the preparation of this Memorandum of Fees.

2 **1. The Receiver’s Initial Communications and Efforts With Mr. Grigsby**

3 The first category of fees relates to the Receiver’s initial communications with Mr. Grigsby
4 and the subsequent efforts to locate and recover the Receivership Property in the possession of
5 Mr. Grigsby and/or Paula Beasley. Between the months of July and October 2022, the Receiver
6 made initial contact with Mr. Grigsby and thereafter engaged in substantial correspondence and
7 investigative efforts to determine the location and status of, among other things, the Mercedes Benz
8 G-Wagon. Through his efforts, the Receiver learned that the G-Wagon was, at that time, offered
9 for sale at Vegas Auto Gallery, a Las Vegas dealership. This prompted further investigation as
10 Mr. Grigsby had claimed to have still been in possession of the vehicle. The Receiver thereafter
11 subpoenaed records from Vegas Auto Gallery and subsequently subpoenaed records from Andre
12 Nelms, the individual who purchased the G-Wagon. With an utter lack of clarity, the Receiver also
13 subpoenaed the Nevada Department of Motor Vehicles in an effort to locate additional documents
14 and information. After meeting with Mr. Nelms and receiving documents in response to the
15 Receiver’s subpoena, the Receiver commenced efforts to move the court to compel Mr. Grigsby’s
16 compliance. With respect to the first category of fees, the Receiver devoted 49.1 hours to his initial
17 efforts to obtain Mr. Grigsby’s compliance.

18 **2. The Receiver’s Motion to Compel**

19 October 2022 marked the beginning of this Court’s involvement in this dispute. As above,
20 the Receiver had already spent the better part of three (3) months seeking Mr. Grigsby’s
21 compliance, including meeting directly with Mr. Grigsby, but to no avail. As a result, the second
22 category of fees relates to those incurred in the preparation of the Receiver’s Motion to Compel, as
23 well as the subsequent filings and hearing thereon. In preparation of the Motion to Compel the
24 Receiver devoted significant efforts to analyzing and developing the facts underlying this matter,
25 including through the documents and information gleaned through subpoenas to non-parties.
26 Moreover, the Motion to Compel required substantial research and analysis of relevant case law
27 and authority pertaining to complex aspects of a receiver’s reach and ability to recover assets from
28 non-parties and their counsel. Counsel for the Receiver performed a comprehensive analysis of the

1 authority of this issue, resulting in a thoroughly drafted Motion and Reply. Additionally, counsel
2 for the Receiver devoted significant time toward their preparation for the hearing on the Motion to
3 Compel. In total, the Receiver devoted 72.3 hours to the research, drafting, and argument of the
4 Motion to Compel.

5 **3. The Receiver's Efforts Following the Motion to Compel**

6 The third category of fees relates to the Receiver's efforts to obtain Mr. Grigsby's
7 compliance with the Court's orders following the December 2022 hearing on the Motion to Compel.
8 In granting the Receiver's Motion to Compel, this Court ordered Mr. Grigsby to produce documents
9 and information on eleven (11) distinct topics on or before January 20, 2023. ECF NO. 416 at p.
10 42:14-45:1. On January 20, 2023, the Receiver received a production of documents that did not
11 satisfy the Court's orders. However, given that there appeared to be some effort to comply, the
12 Receiver attempted to work with Mr. Grigsby, providing an extension and corresponded with
13 Mr. Grigsby regarding what additional documents and information would be needed. After a
14 significant extension of time, on March 24, 2023, counsel for the Receiver received a supplemental
15 production of documents that, again, fell woefully short of compliance. As discussed at length in
16 the briefing on this issue, Mr. Grigsby's haphazard productions resulted in the expenditure of
17 substantial resources organizing, de-duplicating, and analyzing the documents. After the
18 Receiver's analysis was complete, the records produced did not answer the questions posed by the
19 Court but instead, raised additional concerns over the conduct of Mr. Grigsby during the time in
20 question. In total, the Receiver devoted 21.1 hours toward seeking Mr. Grigsby's compliance with
21 the Court's order on the Motion to Compel.

22 **4. The Receiver's Motion for Order to Show Cause**

23 In April 2023, nine (9) months after the Receiver first sought Mr. Grigsby's compliance,
24 the Receiver was again forced to seek judicial intervention. Beginning in late March 2023,
25 following the Receiver's futile efforts to work with Mr. Grigsby, counsel for the Receiver began
26 researching and drafting the Motion for Order to Show Cause. Like the Motion to Compel, the
27 Motion for Order to Show Cause encompassed complex legal issues and the analysis and
28 presentation of a significant documents and information, demonstrating the need for additional

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1 orders from the Court. Consistent with each motion on this Matter, the Receiver submitted
2 comprehensive briefs, analyzing and applying controlling authority to the facts and issues
3 surrounding Mr. Grigsby's conduct. The Receiver's counsel devoted 94.9 hours to the research,
4 drafting, and argument of the Motion for Order to Show Cause and the related filings.

5 **5. The Receiver's Efforts Following the Hearing on the Motion for Order**
6 **to Show Cause**

7 As before, after the hearing on the Motion for Order to Show Cause, the Receiver diligently
8 attempted to work with Mr. Grigsby to avoid further waste of receivership resources and to prevent
9 a further strain on the judicial resources. Like the Motion to Compel, the Motion for Order to Show
10 Cause resulted in a complete and detailed directive for Mr. Grigsby, providing one month for
11 compliance. In an effort to expedite the process and to conserve efforts, the Receiver immediately
12 reached out to Mr. Grigsby to arrange a meeting with a purpose of ensuring all parties had a shared
13 understanding of what was expected to be produced and/or turned over. However, the Receiver's
14 efforts went unanswered and, instead, at the eleventh hour, counsel for Mr. Grigsby made a feeble
15 effort to refute the Court's orders, re-hashing old arguments and ignoring clear directives from the
16 court. Indeed, counsel for the Receiver went so far as to prepare a summary of what documents
17 and information were needed to comply with the Court's orders, only to receive counterpoints in
18 response. Given that Mr. Grigsby and his new counsel had not even attempted to comply with the
19 Court's most recent directive, the Receiver, as ordered by the Court, began the preparation of a
20 Motion for Contempt and a Motion for Turnover. Following the hearing on the Motion for Order
21 to Show Cause, the Receiver's counsel devoted 9.3 hours toward communicating and working with
22 Mr. Grigsby and his counsel for full compliance but was again left empty-handed.

23 **6. The Receiver's Motion for Contempt and the Motion for Turnover**

24 Following Mr. Grigsby's failure to comply with the Court's order on the Motion for Order
25 to Show Cause, counsel for the Receiver began drafting the Motion for Contempt and the Motion
26 for Turnover.⁴² Despite being advised by the Court, of the futility of his jurisdictional arguments,
27

28 ⁴² Following the August 25, 2023 hearing on the Receiver's Motion for Order to Show Cause, Mr. Grigsby
filed a Motion to Withdraw as Counsel of Record for Paula Beasley on September 18, 2023. As a result, the

1 Mr. Grigsby's response to the Receiver's Motion for Contempt and the Motion for Turnover re-
 2 hashed arguments that had been thoroughly briefed and conclusively decided by the Court, resulting
 3 in an unnecessary waste of both Receivership, and judicial, resources.⁴³

4 When the Receiver's Motion for Contempt and Motion for Turnover came before the Court
 5 for hearing on December 13, 2023, Mr. Grigsby was nowhere to be found. Counsel for Mr. Grigsby
 6 cited a conflicting hearing in another court for the missed appearance and, following testimony of
 7 Paula Beasley, the hearing was continued to the following day, December 14, 2023. The second
 8 day of hearings on the Receiver's Motion for Contempt and the Motion for Turnover resulted in a
 9 finding of contempt, an order that Mr. Grigsby turnover to the Receiver \$405,302.40 to be
 10 accompanied by a per diem fine of \$50 beginning on the first day of noncompliance, with the
 11 amount doubling every third day, and an award of attorney's fees, to be established by the instant
 12 Memorandum of Fees. ECF Nos. 617, 621. With respect to the sixth category of fees, counsel for
 13 the Receiver allocated 109.1 hours toward the Contempt Motions.

14 **7. Efforts Following the Hearing on the Motion for Contempt and the**
 15 **Motion for Turnover, Including the Preparation of the Instant**
 16 **Memorandum of Fees**

17 As of the date of this Memorandum of Fees, Mr. Grigsby has not yet complied with the
 18 Court's contempt order. Counsel for the Receiver has communicated with Mr. Kajioka in an effort
 19 to coordinate payment and has been advised of an impending substitution of counsel for
 20 Mr. Grigsby. The remainder of the Receiver's efforts in this respect have been devoted to the
 21 analysis of the fees incurred from July 2022 to the present and the preparation of the instant
 22 Memorandum of Fees. The Receiver's role in this case cannot be understated. Indeed, as

23 _____
 24 instant Memorandum of Fees does not include any fees related to the Receiver's efforts directed at Paula
 Beasley after September 18, 2023.

25 ⁴³ This Court noted that repetitive and meritless arguments presented in response to the Receiver's Motion
 26 for Contempt and Motion for Turnover. *See* ECF No. 621 at p. 10:9-12; 16:13-17 ("Again, Judge Youchah
 27 rejected Grigsby's argument that the court lacked jurisdiction over the proceeding..."); 21:2-23:4 ("Those
 28 arguments were twice rejected by Magistrate Judge Youchah; and twice, Grigsby never appealed those
 orders. When Grigsby filed his opposition to this contempt motion, the lack of jurisdiction argument was
 raised once again. [] Not only were there no points and authorities cited to support the argument, Grigsby
 failed to address the authority cited by Judge Youchah that directly contradicts his argument. []" The Court
 thereafter reminded Grigsby and his counsel for Nevada Rules of Professional Conduct 3.3 and 5.1(b)).

1 demonstrated through the Receiver's quarterly applications for fees, the invoices for the Receiver's
2 counsel are detailed and comprehensive, consisting of a significant number of entries. As a result,
3 review of the Receiver's invoices from the outset of this dispute required a significant effort on the
4 part of the Receiver, the fees for which are recoverable in this circumstance. *See Clark*, 803 F.2d
5 at 992. As of the filing of this Memorandum of Fees, the Receiver has allocated 15.1 hour to efforts
6 following the hearing on the Contempt Motions and the instant Memorandum of Fees.

7 The proceedings can be summed up as follow: Mr. Grigsby knowingly refrained from
8 complying with this Court's clear orders despite multiple opportunities to "come clean."
9 ECF No. 621 at p. 10:9-18. The Receiver performed a full and thorough course of briefing through
10 each proceeding, complete with the analysis and application of applicable and controlling case law.
11 In response, Mr. Grigsby filed, on multiple occasions, briefs bereft of any citation to authority which
12 also ignored and/or mischaracterized the Court's prior rulings and orders. ECF No. 621 at p. 21:2-
13 20 (citing the applicable rules of professional conduct implicated by Mr. Grigsby's conduct). The
14 result has been seventeen (17) months of efforts directed toward obtaining a Nevada licensed
15 attorney's compliance with foundational orders in the proceeding to which his client's husband is
16 the main defendant. At this stage, there can be little argument that the totality of efforts and
17 proceedings related to Mr. Grigsby in this case were unnecessary. Worse, despite these efforts,
18 there has been no turnover from Mr. Grigsby, apart from a check in the amount of \$20.88
19 purportedly representing the totality of funds remaining in his trust account at the time of his
20 withdrawal as counsel for Paula Beasley.

21 As such, and in light of the wide range of issues presented in the multiple filings, this Court
22 may reasonably find that the totality of the Receiver's efforts, including the filing of each motion,
23 were complex, novel and difficult.

24 **d. The Skill Requisite to Perform the Legal Service Properly**

25 In line with the preceding section, significant skill and expertise was required to perform
26 the legal services discussed herein. As above, this matter involved a wide range of complex legal
27 theories, each of which were researched, briefed, and addressed in full detail by counsel for the
28 Receiver.

1 **e. The Preclusion of Other Employment Due to Acceptance of the Case**

2 Greenberg Traurig is a global firm of significant capacity, such that although individual
3 lawyers may have been working at capacity on this matter, the firm was not, as a whole, precluded
4 from performing other work. However, given the breadth of the matters at issue in this case, the
5 substantial amount of time devoted to addressing Mr. Grigsby’s unwarranted nonclients, and the
6 multiple meritless filings, could have been allocated to other efforts to preserve and marshal the
7 Receivership Estate. Indeed, as of the date of this filing, the Receiver and his counsel continue to
8 work diligently to locate and take control of all receivership assets in accordance with the
9 Appointment Order. As such, the 371.3 hours allocated to seeking Mr. Grigsby’s compliance
10 precluded the Receiver from utilizing that time to further the interests of the Receivership Estate.

11 **f. The Customary Fee and Whether the Fee is Fixed or Contingent**

12 Greenberg Traurig has been approved by this Court as counsel for the Receiver.⁴⁴ As set
13 forth in the Motion For Order Authorizing Receiver to Employ Counsel (ECF No. 89), Greenberg
14 Traurig agreed to a substantial reduction of its customary rates in this case. With respect to the
15 fees sought through the instant Memorandum, Greenberg Traurig charged the rates previously
16 approved by this Court.⁴⁵ Indeed, only three Greenberg Traurig attorneys and two paralegal worked
17 on this matter, each of whom charged rates previously approved by this Court. Shareholder Kara
18 Hendricks devoted 98.6 hours to this dispute for a total of \$47,352.54, averaging \$480.25 per
19 hour.⁴⁶ Associate Christian Spaulding worked 197.1 hours, for a total of \$62,825.75, averaging
20 \$318.75 per hour.⁴⁷ Associate Kyle Ewing spent 36 hours on this matter for a total of \$12,240.00,
21 averaging ///

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23 ⁴⁴ ECF Nos. 89, 219.

24 ⁴⁵ ECF Nos. 219, 315 – Order Approving Amended First Application of Receiver and Receiver’s
25 Professionals for Allowance and Payment of Fees and Costs for the Period From June 3, 2022 through June
26 30, 2022 (the “Order Approving Receiver’s First Application for Fees”). Through the Order Approving
Receiver’s First Application for Fees, this Court previously approved hourly rates for Greenberg Traurig
mirroring those requested herein.

27 ⁴⁶ Through the Receiver’s Motion to Employ Counsel (ECF No. 89), this Court approved Mrs. Hendricks
hourly rate of \$480.25. ECF No. 219.

28 ⁴⁷ Through the Receiver’s Motion to Employ Counsel (ECF No. 89), this Court approved Mr. Spaulding’s
hourly rate of \$318.75. ECF No. 219.

1 \$340.00 per hour.⁴⁸ Additionally, paralegals Cynthia Ney and Steph Morrill worked 15.6 and 24
2 hours, respectively for a total of \$6,930.00, at an average rate of \$175.00 per hour. As can be seen
3 from the foregoing, Greenberg Traurig worked this matter efficiently and at a significant discount
4 from its ordinary rates.

5 **g. The Time Limitations Imposed by the Client or the Circumstances**

6 The Receiver’s efforts directed toward Mr. Grigsby were performed under narrow time
7 limitations. Indeed, at the outset of this dispute, the Receiver was in the early stages of his efforts
8 to recover Receivership assets, working quickly to locate and take control of millions of dollars of
9 property and real property from numerous parties. It was during this time that Mr. Grigsby’s non-
10 compliance first required the Receiver’s efforts—efforts that should have been allocated elsewhere.
11 That is to say, the Receiver should not have been in the position to move the court for an order
12 directing a licensed attorney to comply with a court order of which he had full knowledge. Yet, the
13 Receiver was not only forced to come before the Court once, but was thereafter required to come
14 back to the Court on two separate occasions.

15 This matter first came before the Court in October 2022—at least three (3) months after the
16 Receiver first communicated with Mr. Grigsby. The parties thereafter engaged in a contorted
17 course of litigation, replete with improper filings, repeat arguments, and half-hearted attempts at
18 compliance. With this in mind, the Receiver endeavored to allocate sufficient resources to
19 Mr. Grigsby’s non-compliance while simultaneously continuing his efforts to recover funds for the
20 Receivership Estate. All of the Receiver’s efforts in this case are necessarily conducted with a
21 “time is of the essence” mentality as each additional day that funds and/or assets are held by third
22 parties presents the possibility of dissipation of Receivership Property, potentially diminishing the
23 availability of recovery for the victims of the Ponzi-scheme. In other words, for each day that
24 Mr. Grigsby dragged this out, further dissipating the Receivership of the assets and funds under his
25 control, the Receiver was deprived of the ability to marshal and preserve those funds for the benefit

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28 ⁴⁸ Through the Receiver’s Motion to Employ Counsel (ECF No. 89), this Court approved Mr. Ewing’s hourly rate of \$340.00. ECF No. 219.

1 of the victims. For this reason, collection efforts, such as those directed toward Mr. Grigsby, are
2 conducted under tight time limitations.

3 **h. The Experience, Reputation, and Ability of the Attorneys**

4 GT was chosen by the Receiver as counsel based on GT’s expertise and ability to adequately
5 represent the Receiver and assist in the duties and obligations under the Appointment Order and the
6 firm’s local contacts and expertise.⁴⁹ GT is AV rated by Martindale Hubbell and has an excellent
7 reputation in the legal community.⁵⁰ Moreover, GT has extensive experience in all areas of
8 litigation as well as in receivership matters.⁵¹

9 Kara Hendricks is a shareholder in GT’s Las Vegas office and has over 20 years of
10 experience litigating matters as well as working with companies to resolve disputes outside of the
11 litigation context.⁵² Ms. Hendricks is experienced representing businesses in all manners of
12 contract disputes, litigating products liability matters, handling catastrophic injury cases, defending
13 civil rights claims, litigating employment non-compete agreements, handling derivative suits,
14 resolving property and construction defect disputes, assessing insurance coverage issues, and has
15 represented receivers appointed to handle matters involving insolvent insurance companies.⁵³

16 Kyle Ewing and Christian Spaulding are associates in the Las Vegas office and regularly
17 practice in both the state and federal district courts of Nevada.⁵⁴ Kyle Ewing has been practicing
18 since 2015 and has experience handling large scale and complex litigation in state and federal
19 court.⁵⁵ Likewise, Christian Spaulding has been practicing since 2016 and has experience handling
20 large scale and complex litigation in state and federal court.⁵⁶ As a shareholder, Mrs. Hendricks

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23 ⁴⁹ **Exh. 1**, Hendricks Decl. at ¶ 6.

24 ⁵⁰ **Exh. 1**, Hendricks Decl. at ¶ 7.

25 ⁵¹ *Id.* at ¶ 8.

26 ⁵² *Id.* at ¶ 9.

27 ⁵³ *Id.* at ¶ 10.

28 ⁵⁴ *Id.* at ¶ 11.

⁵⁵ **Exh. 1**, Hendricks Decl. at ¶ 12.

⁵⁶ *Id.* at ¶ 13.

1 oversaw GT’s role in this matter, with Mr. Ewing and Mr. Spaulding handling the bulk of the
2 research, drafting, and analysis required.⁵⁷

3 **i. The Undesirability of the Case**

4 This matter could be considered “undesirable” only insofar as Mr. Grigsby’s tactics have
5 created unnecessary work and expenses borne by the Receiver – and ultimately the beneficiaries of
6 the Receivership Estate. The vexatious, and potentially unethical, conduct of Mr. Grigsby is readily
7 apparent through the Receiver’s filings and further cemented by the orders of the Court in each
8 instance.

9 **j. The Nature and Length of the Professional Relationship With the Client**

10 Shortly after being appointed by this Court, the Receiver retained Greenberg Traurig to
11 assist him in carrying out his duties under the Appointment Order. ECF No. 89. In the
12 eighteen (18) months since being retained, Greenberg Traurig has worked closely with the Receiver
13 and performed a litany of services to assist the Receiver in carrying out his duties. Greenberg
14 Traurig also represents the Receiver in other receivership actions pending in this District and others
15 throughout the country.

16 **k. Awards in Similar Cases**

17 As this Court is aware, the proceedings giving rise to the instant Memorandum were the
18 direct result of Mr. Grigsby’s failure to comply with the terms of this Court’s orders. After failed
19 attempts to induce compliance, the Receiver was forced to seek judicial intervention on three (3)
20 separate occasions. Courts of this jurisdiction have awarded fee requests in situations analogous to
21 this, wherein a party was forced to compel another’s compliance with court orders or applicable
22 rules. By way of example, in *Grimsley v. Charles River Labs*, the Court granted defendants’ request
23 for attorneys’ fees in opposing plaintiff’s motion to compel. *Grimsley v. Charles River Labs.*,
24 No. 3:08-cv-00482-LRH-VPC, 2010 U.S. Dist. LEXIS 123769, at *17 (D. Nev. Nov. 2, 2010). In
25 *Grimsley*, the plaintiff failed to engage in a meaningful meet and confer despite a direct order from
26 the court to do so. Subsequently, Plaintiff filed a motion to compel discovery responses, which was
27 denied by the court. Because the plaintiff had failed to comply with the court’s order to engage in

28 ⁵⁷ *Id.* at ¶ 14.

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1 meaningful meet and confer efforts, the court awarded the defendant its attorney fees and costs.
2 Similarly, in *Invesco High Yield Field v. Jecklin*, the Court found that 60.9 hours at a blended rate
3 of \$492 per hour to be reasonably incurred in relation to a motion to compel.

4 Looking closer, this Court has, in this case, previously approved an award mirroring that
5 sought in the instant Memorandum of Fees. In December 2022, while allocating efforts toward
6 Mr. Grigsby, the Receiver was simultaneously engaged in a remarkably similarly dispute with
7 attorney Kamille Dean, who had been the recipient of Receivership Funds. Like Mr. Grigsby,
8 Ms. Dean submitted multiple meritless findings to the Court, resulting in a substantial allocation of
9 effort on the part of the Receiver. After ordering Ms. Dean to turnover the funds she had received,
10 the Court granted the Receiver an award of the fees incurred in seeking Ms. Dean’s compliance and
11 on December 29, 2022, this Court entered an order finding the fees charged by Greenberg Traurig
12 “well within the range of rates charged in Nevada for legal services.” ECF No. 417 at p. 2.
13 Additionally, this Court found the Receiver’s time entries appropriate under the Ninth Circuit’s *Van*
14 *Gerwen* analysis. *Id.* at p. 3 (citing *Van Gerwen v. Guarantee Mut. Life Co.*, 214 F.3d 1041, 1045
15 (9th Cir. 2000)).

16 As before, the rates charged by Greenberg Traurig in this dispute are unchanged from those
17 related to Ms. Dean in 2022. Additionally, Greenberg Traurig has continued its practice of billing,
18 complying with SEC billing requirements, as evidenced from the Receiver’s quarterly fee
19 applications submitted to date. *See e.g.* ECF Nos. 308, 365, 466, 519, 606.

20 With respect to the services rendered by Greenberg Traurig, the Receiver seeks
21 compensation in the amount of \$129,348.29 for 371.3 hours of work at a blended rate of
22 approximately \$348.36 per hour. Attached to Ms. Hendricks’ declaration attached hereto is a
23 spreadsheet documenting the charges related to the Receiver’s efforts toward Mr. Grigsby as well
24 as the itemized billing entries showing the time worked in tenths of hours.

25 Given that this Court has issued awards exceeding this amount, in instances less egregious
26 than this, the Receiver’s requested fees are reasonable and appropriate.

27 ///

28 ///

1 **III. CONCLUSION**

2 For the foregoing reasons, the Receiver and Greenberg Traurig respectfully request the
3 Court order the payment of the reasonable fees and costs incurred in the amount of \$146,586.45
4 which includes the fees incurred in preparing the instant Memorandum.

5 DATED this 5th day of January, 2024.

6 **GREENBERG TRAUIG, LLP**

7 */s/ Kara B. Hendricks*

8 KARA B. HENDRICKS

9 Nevada Bar No. 07743

10 KYLE A. EWING

11 Nevada Bar No. 014051

12 CHRISTIAN T. SPAULDING

13 Nevada Bar No. 14277

14 *Attorneys for Receiver Geoff Winkler*

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CERTIFICATE OF SERVICE

Pursuant to Fed. R. Civ. P. 5(b), I hereby certify that on the **5th day of January 2024**, a true and correct copy of the foregoing was filed electronically via the Court’s CM/ECF system. Notice of filing will be served on all parties registered to this case by operation of the Court’s CM/ECF system, and parties may access this filing through the Court’s CM/ECF system.

/s/ Evelyn Escobar-Gaddi
An employee of GREENBERG TRAUIG, LLP

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EXHIBIT 1

EXHIBIT 1

Declaration of Kara B. Hendricks

1 KARA B. HENDRICKS, ESQ.
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 Nevada Bar No. 014051
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9 *Attorneys for Geoff Winkler, Receiver for*
 10 *J&J Consulting Services, Inc., J&J Consulting Services, Inc.,*
 11 *J and J Purchasing LLC, The Judd Irrevocable Trust,*
 12 *and BJ Holdings LLC*

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

14 SECURITIES AND EXCHANGE
 COMMISSION,

15 Plaintiff,

16 vs.

17 MATTHEW WADE BEASLEY; *et al.*,

18 Defendants,

19 THE JUDD IRREVOCABLE TRUST; *et al.*,

20 Relief Defendants.

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

**DECLARATION OF KARA B.
 HENDRICKS IN SUPPORT
 MEMORANDUM OF FEES AND COSTS
 PURSUANT TO COURT ORDERS ON
 RECEIVER’S MOTION TO FIND
 AARON GRIGSBY IN CONTEMPT FOR
 FAILURE TO COMPLY WITH THIS
 COURT’S ORDERS (ECF No. 584) AND
 MOTION FOR ORDER DIRECTING
 THE TURNOVER OF RECEIVERSHIP
 PROPERTY FROM AARON GRIGSBY
 (ECF No. 585)**

23 I, KARA B. HENDRICKS, ESQ. declare as follows:

24 1. I am over 21 years old and I am a shareholder at Greenberg Traurig LLP, based in
 25 its Las Vegas, Nevada office. I am a licensed Nevada attorney.

26 2. By virtue of my position with Greenberg Traurig, I am competent to testify to the
 27 matters presented in this declaration, and I submit this declaration in support of the Receiver’s
 28 Memorandum of Fees and Costs Pursuant to Court Orders on Receiver’s Motion to Find Aaron

1 Grigsby in Contempt for Failure to Comply With This Court’s Orders (ECF No. 584) and Motion
2 for Order Directing the Turnover of Receivership Property From Aaron Grigsby (ECF No. 585)
3 (the “Memorandum of Fees”).

4 3. This declaration is based on my personal knowledge, except where made on
5 information and belief, and as to those matters, I believe them to be true.

6 4. Greenberg Traurig was retained by the Receiver in June 2022.

7 5. The Receiver selected Greenberg Traurig as one of two firms serving as general
8 receivership counsel due to the firm's litigation experience, receivership experience, and strong
9 Nevada base.

10 6. GT was chosen by the Receiver as counsel based on GT’s expertise and ability to
11 adequately represent the Receiver and assist in the duties and obligations under the Appointment
12 Order and the firm’s local contacts and expertise.

13 7. GT is AV rated by Martindale Hubbell and has an excellent reputation in the legal
14 community.

15 8. Moreover, GT has extensive experience in all areas of litigation as well as in
16 receivership matters.

17 9. I am a shareholder in GT’s Las Vegas office and have over 20 years of experience
18 litigating matters as well as working with companies to resolve disputes outside of the litigation
19 context.

20 10. I am experienced representing businesses in all manners of contract disputes,
21 litigating products liability matters, handling catastrophic injury cases, defending civil rights
22 claims, litigating employment non-compete agreements, handling derivative suits, resolving
23 property and construction defect disputes, assessing insurance coverage issues, and has represented
24 receivers appointed to handle matters involving insolvent insurance companies.

25 11. Kyle Ewing and Christian Spaulding are associates in the Las Vegas office and
26 regularly practice in both the state and federal district courts of Nevada.

27 12. Kyle Ewing has been practicing since 2015 and has experience handling large scale
28 and complex litigation in state and federal court.

1 13. Likewise, Christian Spaulding has been practicing since 2016 and has experience
2 handling large scale and complex litigation in state and federal court.

3 14. As a shareholder, I oversaw GT's role in this matter with Mr. Ewing and
4 Mr. Spaulding handling the bulk of the research, drafting and administrative work required.
5 Additionally, Cynthia Ney and Steph Morrill are experienced paralegals in GT's Las Vegas office
6 and have assisted in the handling of numerous matters in both state and federal courts.

7 15. The Receiver's efforts with respect to Mr. Grigsby began shortly after his
8 appointment in June 2022.

9 16. As stated in prior filings, through preliminary communications, the Receiver
10 understood that Mr. Grigsby would be complicit in the turnover of all Receivership Property in his
11 and/or Paula Beasley's possession.

12 17. However, as days and weeks passed, it became increasingly clear that Mr. Grigsby
13 was not interested in cooperating with the Receiver as required by Court order, opting instead for a
14 course of resistance, misrepresentations, and denial.

15 18. The result was the significant expenditure of resources on the part of the Receiver.

16 19. Inclusive of the Receiver's efforts directed toward Mr. Grigsby bringing the filing a
17 motion with this Court, counsel for the Receiver allocated 371.3 hours toward Mr. Grigsby's
18 compliance and the recovery of the Receivership Property in question.

19 20. This time included diligent efforts to obtain Mr. Grigsby's compliance without court
20 intervention, including repeat communications, meetings, an investigation into the status of the
21 assets, and the issuance of subpoenas to third parties to obtain documents and information related to
22 the sale of the G-Wagon.

23 21. With respect to only court filings, the Receiver has incurred fees in the drafting of:

- 24 a. The Motion to Compel;
- 25 b. The Receiver's Reply in Support of the Motion to Compel;
- 26 c. The Motion for Order to Show Cause;
- 27 d. The Receiver's Reply in Support of the Motion for Order to Show Cause;
- 28 e. The Motion for Contempt;

- 1 f. The Motion for Turnover;
- 2 g. The Receiver's Reply in Support of the Motion for Contempt;
- 3 h. The Receiver's Reply in Support of the Motion for Turnover;

4 22. Additionally, the Receiver incurred fees in the preparation and participation in
5 hearings on the above motions on December 16, 2022, August 25, 2023, December 13, 2023 and
6 December 14, 2023.

7 23. While the efforts directed toward Mr. Grigsby were substantial, the Receiver and his
8 counsel took care not to overstaff this matter and made every effort to minimize fees to the extent
9 possible.

10 24. Greenberg Traurig allocated its efforts in this matter as efficiently as reasonably
11 possible with Associate Christian Spaulding accounting for 197.1 hours, representing 53% of the
12 371.3 total hours worked.

13 25. Mr. Spaulding did the majority of the review of documents, research and drafting
14 associated with the Motion to Compel, the Motion for Order to Show Cause, the Motion for
15 Contempt and the Motion for Turnover.

16 26. I managed the majority of the communications with third-parties, including
17 Mr. Grigsby and his counsel and contributed significantly to the drafting of the Receiver's Motions,
18 contributing 98.6 hours.

19 27. Additionally, Associate Kyle Ewing contributed to the analysis and drafting of the
20 Motions as well as research, investigation and strategy on the same, totaling 36 hours.

21 28. The remainder of the hours spent are attributed to work performed by the paralegals
22 at Greenberg Traurig, accounting for 39.6 hours allocated to Paralegals Cynthia Ney and Steph
23 Morrill.

24 29. Ms. Ney and Ms. Morrill assisted Mrs. Hendricks, Mr. Spaulding, and Mr. Ewing in
25 strategizing and completing the filings in this matter.

26 30. As can be seen from the billing entries on this matter, Greenberg Traurig took care to
27 ensure an efficient use of resources and that efforts were not duplicated.

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1 31. In total, the Receiver has incurred \$129,348.29 in reasonable and necessary fees in
2 pursuing Mr. Grigsby’s compliance with the Asset Freeze, Appointment Order, and the Court’s
3 orders on the Motion to Compel, the Motion for Order to Show Cause, the Motion for Contempt and
4 the Motion for Turnover.¹

5 32. Of that amount, \$3,648.65 represents the fees incurred in preparing the instant
6 Memorandum of Fees.

7 33. Given the foregoing and in light of the circumstances giving rise to this matter, the
8 371.3 hours spent by Greenberg Traurig were reasonable and appropriate.

9 34. Attached to this declaration as **Exhibit A** is a spreadsheet prepared by Greenberg
10 Traurig demonstrating all billing entries referenced in the Memorandum of Fees. This spreadsheet
11 was prepared for this Court’s convenience with the full invoices submitted concurrently herewith.

12 35. Attached to this declaration as **Exhibit B** are true and correct copies of the invoice
13 entries related to the Receiver’s efforts directed toward Mr. Grigsby.

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

16 Executed on January 5, 2024.

17 */s/ Kara B. Hendricks*

18 KARA B. HENDRICKS, ESQ.

19 Declarant

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27 ¹ For the fees incurred in drafting this Memorandum of Fees, a 15% discount was applied to the amount
28 reflected on the December 2023 pre-bill attached hereto to reflect the hourly rates approved by this Court.
ECF No. 219. Additionally, the fees incurred by paralegal Steph Morrill were reduced to \$175.00 per hour
consistent with this Court’s order. ECF No. 219.

EXHIBIT A

EXHIBIT A

Spreadsheet

EXHIBIT A

Greenberg Traurig, LLP Attorney Fees

Date	TKPR Name	Bill Num	Bill Date	Bl Hrs	Billed Amt	Narrative
7/19/2022	Hendricks, Kara B.	1000096060	10/3/2022	0.1	\$48.02	Correspond with A. Grisby regarding list of seized assets.
7/20/2022	Hendricks, Kara B.	1000096060	10/3/2022	0.1	\$48.02	Attention to information from A. Grigsby regarding assets seized from Beasley.
7/21/2022	Hendricks, Kara B.	1000096060	10/3/2022	0.3	\$144.07	Telephone call to A. Grigsby regarding Paula Beasley default notice and research issues relating to Ruffian house and payments.
7/27/2022	Hendricks, Kara B.	1000096060	10/3/2022	0.1	\$48.02	Return call to A. Grisby regarding assets held by Paula Beasley.
7/27/2022	Hendricks, Kara B.	1000096060	10/3/2022	0.2	\$96.05	Correspond with A. Grigsby regarding P. Beasley and questions regarding assets.
8/2/2022	Hendricks, Kara B.	1000142381	11/9/2022	0.4	\$192.10	Telephone call with A. Grisby regarding Paula Beasley assets and send update to G. Winkler regarding same;
8/4/2022	Hendricks, Kara B.	1000142381	11/9/2022	1.4	\$672.35	Prepare letter to A. Grisby re: P. Beasley assets and issues with lack of cooperation (1.4); and correspond with G. Winkler regarding additional items and information to include in same (.2);
8/4/2022	Spaulding, Christian	1000142381	11/9/2022	0.2	\$63.75	Evaluate correspondence with counsel for P. Beasley regarding property to be surrendered.
8/16/2022	Hendricks, Kara B.	1000142381	11/9/2022	0.5	\$240.13	Review information provided by A. Grigsby regarding house payment (Ruffian Road) and follow-up with G. Winkler(.2); Respond to A. Grisby email and outline additional information requested and timeline for turnover (.3);
8/22/2022	Hendricks, Kara B.	1000142381	11/9/2022	0.3	\$144.08	Review emails and correspondence from A. Grisby regarding Beasley asset turnover and document requests and follow-up regarding issues raised therein with both A. Grisby and G. Winkler;
8/23/2022	Hendricks, Kara B.	1000142381	11/9/2022	1.1	\$528.28	Telephone call with G. Winkler re: concerns regarding Beasley turnover of assets (x2)(.2); Prepare correspondence to A. Grisby to further address same and follow-up regarding requested documents (.7); Update letter based on new information from G. Winkler (.2);
9/13/2022	Ewing, Kyle	1000142507	11/9/2022	0.8	\$272.00	Conference with K. Hendricks re: the receiver's discovery that P. Beasley sold her Mercedes G Wagon as a discount in derogation of the asset freeze and receivership orders; strategize re: options for halting any sale and otherwise protecting the estate's interest in the vehicle.
9/13/2022	Hendricks, Kara B.	1000142507	11/9/2022	0.3	\$144.08	Request C. Spaulding's assistance with preparation of subpoena for information regarding G-Wagon on Beasley asset list at dealership and correspond via email regarding issues arising from lack of title and C. Spaulding's research regarding same.
9/13/2022	Hendricks, Kara B.	1000142507	11/9/2022	0.5	\$240.13	Review federal rules regarding subpoenas and follow-up with K. Ewing regarding newly identified issues relating to vehicles in posses of third parties and ability to obtain additional information regarding same.
9/13/2022	Hendricks, Kara B.	1000142507	11/9/2022	0.7	\$336.18	Prepare correspondence to Vegas Valley Auto regarding G-Wagon and advising of receivership order and asset freeze.
9/13/2022	Spaulding, Christian	1000142507	11/9/2022	1.1	\$350.63	Evaluate vehicle asset list and draft subpoena to Vegas Auto Gallery regarding G-Wagon offered for sale.
9/13/2022	Spaulding, Christian	1000142507	11/9/2022	1.6	\$510.00	Evaluate Nevada authority regarding sale of vehicle without title, process for obtaining new title and rights related thereto.
9/14/2022	Hendricks, Kara B.	1000142507	11/9/2022	0.2	\$96.05	Finalize correspondence to Vegas Valley regarding G-Wagon.
9/14/2022	Hendricks, Kara B.	1000142507	11/9/2022	0.2	\$96.05	Correspond with B. Tranquillo via email regarding G-Wagon and other vehicles identified on receiver asset list.
9/14/2022	Hendricks, Kara B.	1000142507	11/9/2022	1	\$480.25	Review and revise subpoena to Vegas Auto Gallery (.2); Request C. Ney's assistance with notice of subpoena and identifying emails for service list (.3); Update notice to parties (.3); Email C. Fronk and T. Combs and provide information regarding subpoena (.2).
9/14/2022	Hendricks, Kara B.	1000142507	11/9/2022	0.2	\$96.05	Telephone call with Blake from Vegas Auto Gallery regarding G-Wagon and discussion regarding next steps.
9/14/2022	Hendricks, Kara B.	1000142507	11/9/2022	0.2	\$96.05	Discuss subpoena to auto dealership with C. Spaulding (.1); Telephone call to J. Richard to discuss subpoena related issues (.1).

EXHIBIT A

Greenberg Traurig, LLP Attorney Fees

Date	TKPR Name	Bill Num	Bill Date	Bl Hrs	Billed Amt	Narrative
9/14/2022	Ney, Cynthia L.	1000142507	11/9/2022	1.7	\$297.50	Preparation of Notice of Subpoena directed to Vegas Auto Gallery regarding P.Beasley vehicle (.3); prepare chart of parties/counsel email for receipt of Notice of Subpoena (.6); finalize notice and Subpoena and service upon parties/counsel (.3); service via email of subpoena to Vegas Auto Gallery (.1); arrangements for process server to serve subpoena upon Vegas Auto Gallery (.2); communications with K.Hendricks regarding same (.2).
9/14/2022	Spaulding, Christian	1000142507	11/9/2022	1.1	\$350.63	Revise and Finalize Subpoena and Exhibit thereto regarding Beasley G-Wagon offered for Sale at Vegas Auto Gallery.
9/20/2022	Hendricks, Kara B.	1000142507	11/9/2022	0.3	\$144.08	Telephone call with Blake from Vegas Auto Gallery regarding pick-up of G-Wagon and discussion with A. Nicholas regarding same.
9/20/2022	Hendricks, Kara B.	1000142507	11/9/2022	0.7	\$336.18	Call to B. Price-Zoom regarding Beasley Mercedes G-Wagon, subpoena, and request for pick-up and follow-up via email and exchange and review related documents.
9/21/2022	Hendricks, Kara B.	1000142507	11/9/2022	0.3	\$144.08	Review subpoena to Lexus Henderson (.1); Request C. Ney prepare notice of subpoena (.1); Follow-up with C. Spaulding regarding A. Nelms subpoena (.1).
9/21/2022	Hendricks, Kara B.	1000142507	11/9/2022	0.2	\$96.05	Review and revise subpoena to A. Nelms and request C. Ney assistance with finalizing same.
9/21/2022	Hendricks, Kara B.	1000142507	11/9/2022	0.1	\$48.03	Review information from B. Pride-Zorn regarding Beasley G-Wagon and update B. Tranquillo regarding same.
9/21/2022	Ney, Cynthia L.	1000142507	11/9/2022	0.2	\$35.00	Email communications with K.Hendricks and C.Spaulding regarding subpoenas.
9/21/2022	Spaulding, Christian	1000142507	11/9/2022	1.3	\$414.38	Evaluate response from Vegas Auto Gallery and Draft Subpoena to Andre Nelms regarding Mercedes Benz G-Wagon.
9/22/2022	Hendricks, Kara B.	1000142507	11/9/2022	0.2	\$96.05	Revise letter to A. Nelms and work with P. January to finalize and send.
9/22/2022	Hendricks, Kara B.	1000142507	11/9/2022	0.3	\$144.08	Provide B. Tranquillo documents obtained from subpoena and provide update regarding efforts to obtain additional information and email correspondence regarding additional vehicles and next steps.
9/22/2022	Hendricks, Kara B.	1000142507	11/9/2022	0.2	\$96.05	Follow-up with C. Ney regarding finalizing car subpoenas and notice and service of same.
9/22/2022	Ney, Cynthia L.	1000142507	11/9/2022	0.6	\$105.00	Edit and finalize subpoenas directed to Lexus of Henderson and Andre Helms and arrangements for service of same.
9/22/2022	Ney, Cynthia L.	1000142507	11/9/2022	0.5	\$87.50	Preparation of notice of subpoenas issued and service of same upon counsel (.4); communications with K.Hendricks regarding subpoenas and notice (.1).
9/22/2022	Spaulding, Christian	1000142507	11/9/2022	0.8	\$255.00	Draft letter to A. Nelms to accompany subpoena regarding Mercedes Benz G-Wagon purportedly obtained from P. Beasley.
9/22/2022	Ney, Cynthia L.	1000142507	11/9/2022	0.2	\$35.00	Communications with process server and K.Hendricks regarding service of subpoena upon A.Nelms.
9/23/2022	Hendricks, Kara B.	1000142507	11/9/2022	0.1	\$48.03	Correspond with G. Winkler regarding car subpoenas and potential depositions relating to the same.
9/23/2022	Ney, Cynthia L.	1000142507	11/9/2022	0.4	\$70.00	Preparation of Notice of Compliance regarding Vegas Auto Gallery subpoena (.3); forwarding of same to Blake Zorn for signature (.1).
9/26/2022	Hendricks, Kara B.	1000142507	11/9/2022	0.3	\$144.08	Attention to emails from G. Winkler and A. Grisby regarding Shoofey tax issues and request C. Ney follow-up regarding representations to confirm payments.
9/27/2022	Hendricks, Kara B.	1000142507	11/9/2022	0.1	\$48.03	Follow-up with C. Ney regarding Shoofey tax findings.
9/27/2022	Ney, Cynthia L.	1000142507	11/9/2022	0.3	\$52.50	Review property records regarding property tax payments made by P.Beasley (.2); communications with K.Hendricks and G.Winkler regarding same (.1).
10/5/2022	Hendricks, Kara B.	1000224348	2/14/2023	0.1	\$48.02	Correspond via email with B. Tranquillo regarding information on Ferrari and list of cars where duplicate title was requested.
10/6/2022	Hendricks, Kara B.	1000224348	2/14/2023	0.6	\$288.15	Telephone call with W. Schuller regarding Andre Nelms subpoena and review same (.3); Update G. Winkler (.1); Review documents produced by Vegas Valley Auto regarding Nelms (.3).
10/7/2022	Ewing, Kyle	1000224348	2/14/2023	0.3	\$102.00	Review documents provided by A. Nelms in connection with his purchase of P. Beasley's Mercedes G-Wagon from Beasley/Grisby.

EXHIBIT A

Greenberg Traurig, LLP Attorney Fees

Date	TKPR Name	Bill Num	Bill Date	Bl Hrs	Billed Amt	Narrative
10/7/2022	Hendricks, Kara B.	1000224348	2/14/2023	0.2	\$96.05	Attention to email regarding duplicate titles and request C. Spaulding research validity of same and impact on sale.
10/7/2022	Hendricks, Kara B.	1000224348	2/14/2023	0.4	\$192.10	Attention to background information on N. Nelms and M. Thomas.
10/7/2022	Hendricks, Kara B.	1000224348	2/14/2023	0.1	\$48.02	Review correspondence from A. Grisby relating to sold vehicles.
10/7/2022	Hendricks, Kara B.	1000224348	2/14/2023	2.4	\$1,152.60	Meet with W. Schueller and A. Nelms to discuss subpoena and purchase of G. Wagon (.7); Review documents provided via subpoena, research new issues and confer with G. Winker and B. Tranquillo regarding G. Wagon and next steps (1.5); Follow-up via phone and email with W. Schueller regarding additional requestes (.2).
10/7/2022	Hendricks, Kara B.	1000224348	2/14/2023	0.2	\$96.05	Follow-up with B. Schuller to arrange for car inspection.
10/7/2022	Spaulding, Christian	1000224348	2/14/2023	1.5	\$478.12	Meeting with Andre Nelms and counsel regarding background of acquisition of Mercedes Benz G-Wagon. Confer with team regarding the same.
10/7/2022	Spaulding, Christian	1000224348	2/14/2023	0.7	\$223.12	Evaluate NRS provisions regarding affect of duplicate title on original title with respect to transfer of vehicles.
10/10/2022	Hendricks, Kara B.	1000224348	2/14/2023	0.3	\$144.07	Review email and follow-up call to W. Schuller regarding A. Nelms (.2); Update G. Winkler and discuss transition of texts and photos (.1).
10/11/2022	Ewing, Kyle	1000224348	2/14/2023	0.2	\$68.00	Conference with G. Winkler, B. Tranquillo (vehicle expert), and K. Hendricks (GT) re: A. Nelms' purported purchase of Beasley Mercedes G Wagon.
10/11/2022	Hendricks, Kara B.	1000224348	2/14/2023	0.2	\$96.05	Attention to emails and additional information from B. Tanquillo regarding vehicles believed to be receivership property and request C. Ney and C. Spaulding assistance with preparing DMV subpoena to obtain additional information.
10/11/2022	Hendricks, Kara B.	1000224348	2/14/2023	1.1	\$528.27	Meet with G. Winkler and B. Tranquillo to discuss G-Wagon issues (before and after viewing of same).
10/11/2022	Hendricks, Kara B.	1000224348	2/14/2023	0.3	\$144.07	Telephone call to B. Schuller regarding G-Wagon and send follow-up email.
10/11/2022	Ney, Cynthia L.	1000224348	2/14/2023	0.6	\$105.00	Call to NV DMV regarding subpoena process (.2); prepare required application for records and affidavit (.4).
10/12/2022	Hendricks, Kara B.	1000224348	2/14/2023	0.1	\$48.02	Follow-up with G. Winkler regarding meeting with Aaron Grisby and motion to compel.
10/12/2022	Hendricks, Kara B.	1000224348	2/14/2023	0.5	\$240.12	Telephone call with G. Winkler regarding discuss with A. Grisby and motion to compel and follow-up with C. Spaulding regarding brief.
10/12/2022	Ney, Cynthia L.	1000224348	2/14/2023	0.5	\$87.50	Prepare subpoena and document requests and forwarding of same to K.Hendricks.
10/13/2022	Hendricks, Kara B.	1000224348	2/14/2023	0.2	\$96.05	Telephone call with B. Schuller regarding G-Wagon and Nelms position regarding same.
10/13/2022	Hendricks, Kara B.	1000224348	2/14/2023	0.3	\$144.07	Attention to draft subpoena and revise DMV application and follow-up with C. Ney to finalize same.
10/13/2022	Hendricks, Kara B.	1000224348	2/14/2023	0.5	\$240.12	Attention to outline for motion for fraudulent transfer and turnover of G-Wagon and request C. Spauldings assistance with preparation of same.
10/13/2022	Hendricks, Kara B.	1000224348	2/14/2023	0.4	\$192.10	Discuss Grisby motion to compel with G. Winkler (.2); Follow-up with C. Spaulding regarding preparation of motion and additional information to include based on recent events (.2).
10/13/2022	Spaulding, Christian	1000224348	2/14/2023	0.3	\$95.62	Confer with K. Hendricks regarding status of vehicle in possession by A. Nelms, potential options for recovery of the same and status of case.
10/13/2022	Ney, Cynthia L.	1000224348	2/14/2023	1	\$175.00	Review and editing of subpoena and application required directed to Nevada Department of Motor Vehicles requesting information on specific Defendant's vehicles (.7); call to DMV regarding same (.2); communications with . Hendricks regarding same (.1).
10/14/2022	Spaulding, Christian	1000224348	2/14/2023	3.3	\$1,051.87	Begin draft of Motion to Compel or Order to Show Cause Why Aaron Grigsby and Paula Beasley should not be held in contempt.
10/14/2022	Ney, Cynthia L.	1000224348	2/14/2023	0.4	\$70.00	Preparation of Notice of Subpoena issued to Nevada DMV and service of same upon counsel.
10/14/2022	Ney, Cynthia L.	1000224348	2/14/2023	0.6	\$105.00	Finalize subpoena and application and arrangements for service of same upon DMV.

EXHIBIT A

Greenberg Traurig, LLP Attorney Fees

Date	TKPR Name	Bill Num	Bill Date	Bl Hrs	Billed Amt	Narrative
10/17/2022	Ewing, Kyle	1000224348	2/14/2023	0.4	\$136.00	Review email correspondence from A. Grigsby re: his failure to provide information/receivership property consistent with the receivership order in connection with reviewing the receiver's motion to compel re: the same; conference with K. Hendricks re: next steps in light of the information provided by Grigsby.
10/17/2022	Hendricks, Kara B.	1000224348	2/14/2023	0.2	\$96.05	Respond to email from B. Scheuller regarding G-Wagon (.1); Follow-up with C. Spaulding regarding preparation of motion (.1).
10/17/2022	Hendricks, Kara B.	1000224348	2/14/2023	0.9	\$432.22	Attention to pleadings from NY action against Beasley, Family Court documents and related information to analyze position asserted regarding P. Beasley right to certain vehicles and assets.
10/17/2022	Hendricks, Kara B.	1000224348	2/14/2023	1.1	\$528.27	Review case law in support of turnover of G-Wagon as fraudulent transfer standards.
10/17/2022	Hendricks, Kara B.	1000224348	2/14/2023	0.6	\$288.15	Review correspondence from T. Combs regarding G-Wagon (.1); Review correspondence from A. Grigsby regarding G-Wagon and prior document requests (.2); Follow-up with D. Scheiss regarding G-Wagon (1.); Send update to G. Winkler (.2).
10/17/2022	Spaulding, Christian	1000224348	2/14/2023	3.1	\$988.12	Evaluate Beasley divorce proceedings and action in Kings County, NY to determine relevance to this matter. Confer with K. Hendricks regarding the same.
10/17/2022	Spaulding, Christian	1000224348	2/14/2023	0.4	\$127.50	Communications with Ben Tranquillo regarding Receivership Vehicles for sale and research regarding the same.
10/17/2022	Spaulding, Christian	1000224348	2/14/2023	8.9	\$2,836.87	Continue and finalize draft of Motion to Compel or for Order to Show Cause Why Aaron Grigsby and Paula Beasley should not be held in contempt.
10/18/2022	Hendricks, Kara B.	1000224348	2/14/2023	4.1	\$1,969.02	Review and revise motion to compel and convert to include P. Beasley and G-Wagon.
10/18/2022	Hendricks, Kara B.	1000224348	2/14/2023	0.2	\$96.05	Attention to email from B. Tranquillo regarding Vegas Valley records and value of G-Wagon on 4/30/22 (.2).
10/18/2022	Ney, Cynthia L.	1000224348	2/14/2023	0.2	\$35.00	Communications with process server and K.Hendricks regarding DMV Subpoena.
10/18/2022	Spaulding, Christian	1000224348	2/14/2023	0.3	\$95.62	Meeting with Kara Hendricks regarding possible means for turnover of Mercedes G-Wagon sold by Paula Beasley.
10/19/2022	Hendricks, Kara B.	1000224348	2/14/2023	0.8	\$384.20	Continue preparation of motion to compel, P. Beasley, A. Grigsby and G-Wagon.
10/19/2022	Hendricks, Kara B.	1000224348	2/14/2023	0.2	\$96.05	Correspond via email with B. Tranquillo regarding G-Wagon value and resources to support same.
10/19/2022	Ney, Cynthia L.	1000224348	2/14/2023	1	\$175.00	Preparation of subpoena and document requests to Vegas Auto Gallery for vehicles owned by M.Beasley (.9); communications with K.Hendricks regarding same (.1).
10/19/2022	Spaulding, Christian	1000224348	2/14/2023	0.3	\$95.62	Review and revise draft of subpoena to Vegas Auto Gallery regarding previous sale of Ferrari and Aston Martin.
10/19/2022	Spaulding, Christian	1000224348	2/14/2023	0.5	\$159.37	Evaluate list of items removed/left at Ruffian property from P. Beasley and corresponding divorce proceeding documents. Confer with K. Hendricks regarding the same.
10/20/2022	Hendricks, Kara B.	1000224348	2/14/2023	4.2	\$2,017.05	Prepare motion to compel relating to P. Beasley, Grigsby and G-Wagon including further factual analysis and research relating to value of G-Wagon for relevant time periods, and request for fees.
10/20/2022	Hendricks, Kara B.	1000224348	2/14/2023	0.1	\$48.02	Attention to subpoena for information regarding Ferrari and Aston Martin.
10/20/2022	Spaulding, Christian	1000224348	2/14/2023	1.9	\$605.62	Evaluate applicable case law regarding bona fide purchaser status and draft summary of the same for K. Hendricks to be inserted into Motion to Compel Re: Aaron Grigsby and Paula Beasley.
10/20/2022	Ney, Cynthia L.	1000224348	2/14/2023	0.8	\$140.00	Finalize subpoena to Vegas Auto Gallery and arrangements for service of same (.3); preparation of notice of subpoena and service of same upon all counsel (.4); communications with K.Hendricks regarding same (.1).
10/21/2022	Hendricks, Kara B.	1000224348	2/14/2023	2.5	\$1,200.62	Update motion to compel with comments from G. Winkler and prepare declarations of G. Winkler and B. Tranquillo in support of the same.
10/21/2022	Hendricks, Kara B.	1000224348	2/14/2023	0.4	\$192.10	Review documents from Vegas Valley and follow-up with B. Tranquillo regarding same.
10/21/2022	Hendricks, Kara B.	1000224348	2/14/2023	0.2	\$96.05	Telephone call from Kelly at the DMV regarding subpoena and follow-up with B. Tranquillo regarding number missing in VIN.
10/21/2022	Hendricks, Kara B.	1000224348	2/14/2023	0.2	\$96.05	Correspond with B. Tranquillo regarding Vegas Valley and provide copy of subpoena (.1); Email Blake at Vegas Valley copy of same (.1).

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Date	TKPR Name	Bill Num	Bill Date	Bl Hrs	Billed Amt	Narrative
10/21/2022	Spaulding, Christian	1000224348	2/14/2023	1.1	\$350.75	Review and revise most recent draft of Motion to Compel or Order to Show Cause Why Aaron Grigsby and Paula Beasley Should not be held in contempt.
10/21/2022	Ney, Cynthia L.	1000224348	2/14/2023	4.4	\$770.00	Analysis and editing of Motion to Compel sale of G-Wagon, supporting declarations of G.Winkler and B.Tranquillo and compile and prepare numerous supporting exhibits (4.2); communications with K.Hendricks regarding same (.2).
10/21/2022	Spaulding, Christian	1000224348	2/14/2023	0.3	\$95.62	Confer with team regarding Beasley Divorce proceedings and gather all available documents regarding the same.
10/21/2022	Ney, Cynthia L.	1000224348	2/14/2023	0.4	\$70.00	Review file regarding VIN numbers and call to NV DMV with same (.3); communications with K.Hendricks and B.Tranquillo regarding same (.1).
10/21/2022	Ney, Cynthia L.	1000224348	2/14/2023	1.8	\$315.00	Analysis and organization of documentation produced by Vegas Auto Gallery (1.6); communications with K.Hendricks regarding same (.2).
10/24/2022	Hendricks, Kara B.	1000224348	2/14/2023	0.3	\$144.07	Attention to emails from B. Tranquillo regarding new documents from subpoenas and follow-up.
10/24/2022	Hendricks, Kara B.	1000224348	2/14/2023	0.3	\$144.07	Provide W. Schuller and A. Grigsby courtesy copy of motion to compel and respond to email from W. Schuller regarding same.
11/2/2022	Hendricks, Kara B.	1000224498	2/14/2023	0.6	\$288.15	Review of records provided by the DMV and forward to B. Tranquillo for further assessment;
11/7/2022	Hendricks, Kara B.	1000224498	2/14/2023	0.1	\$48.03	Respond to email from C. Spaulding regarding notice non-opposition to motion to compel and attaching new text messages;
11/7/2022	Spaulding, Christian	1000224498	2/14/2023	0.2	\$63.75	Confer with team regarding passed deadline for Paula Beasley and Aaron Grigsby to respond to Motion to Compel.
11/7/2022	Spaulding, Christian	1000224498	2/14/2023	1.2	\$382.50	Draft Notice of Non-Opposition and Proposed Order regarding Motion to Compel Paula Beasley and Aaron Grigsby.
11/8/2022	Ewing, Kyle	1000224498	2/14/2023	0.3	\$102.00	Begin reviewing/analyzing P. Beasley's opposition to the receiver's motion to compel/for contempt in connection with analyzing the receiver's reply strategy; review appointment order and other relevant pleadings in connection with the same
11/8/2022	Hendricks, Kara B.	1000224498	2/14/2023	0.3	\$144.08	Review Grigsby response to motion to compel and correspond with C. Spaulding regarding preparation of response to same;
11/8/2022	Spaulding, Christian	1000224498	2/14/2023	0.2	\$63.75	Correspondence with team regarding Response to Motion to Compel filed by P. Beasley and Aaron Grigsby.
11/9/2022	Ewing, Kyle	1000224498	2/14/2023	1.7	\$578.00	Review and analyze P. Beasley's opposition to the receiver's motion to compel/for contempt in connection with analyzing the receiver's reply strategy; review appointment order and other relevant pleadings in connection with the same; research law in connection with the same
11/9/2022	Hendricks, Kara B.	1000224498	2/14/2023	0.2	\$96.05	Discuss Grigsby response and issues to include in reply with C. Spaulding;
11/9/2022	Spaulding, Christian	1000224498	2/14/2023	3.3	\$1,051.88	Evaluate P. Beasley Response to Motion to Compel and begin analysis and draft of Reply in Support.
11/10/2022	Spaulding, Christian	1000224498	2/14/2023	2.9	\$924.38	Continue draft of Reply in Support of Motion to Compel Grigsby and P. Beasley
11/11/2022	Spaulding, Christian	1000224498	2/14/2023	0.5	\$159.38	Evaluate additional filing by P. Beasley and A. Grigsby for differences.
11/11/2022	Spaulding, Christian	1000224498	2/14/2023	0.5	\$159.38	Confer with K. Hendricks regarding declaration in support of Reply brief and draft declaration for Vegas Auto Gallery.
11/11/2022	Spaulding, Christian	1000224498	2/14/2023	6.8	\$2,167.50	Continue draft of Reply in Support of Motion to Compel P. Beasley and Aaron Grigsby.
11/13/2022	Spaulding, Christian	1000224498	2/14/2023	3.3	\$1,051.88	Continue draft of Reply brief in support of P. Beasley Motion to Compel. Communications with P. Beasley regarding the same.
11/14/2022	Ewing, Kyle	1000224498	2/14/2023	0.3	\$102.00	Review and revise comments to reply in support of motion for contempt w/r/t P. Beasley and/or A. Grigsby in connection with finalizing the same and preparing for tomorrow's status check before the Court
11/14/2022	Hendricks, Kara B.	1000224498	2/14/2023	3.8	\$1,824.95	Review and revise reply in support of motion to compel Paula Beasley and A. Grigsby;
11/14/2022	Hendricks, Kara B.	1000224498	2/14/2023	0.2	\$96.05	Revise amended Winkler declaration in support of reply to motion to compel and send for comment;

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Date	TKPR Name	Bill Num	Bill Date	Bl Hrs	Billed Amt	Narrative
11/14/2022	Spaulding, Christian	1000224498	2/14/2023	0.6	\$191.20	Draft Amended Declaration of Geoff Winkler in support of Motion to Compel Re: Paula Beasley and Aaron Grigsby.
11/14/2022	Spaulding, Christian	1000224498	2/14/2023	1.3	\$414.38	Revise draft of Reply in Support of Motion to Compel per comments by client. Proofread and finalize the same.
11/14/2022	Spaulding, Christian	1000224498	2/14/2023	0.2	\$63.75	Finalize draft of Amended Declaration of Geoff Winkler in Support of Motion to Compel per comments by client.
11/14/2022	Spaulding, Christian	1000224498	2/14/2023	0.4	\$127.50	Incorporate declaration of Blake Pride-Zorn into Reply in Support of Motion to Compel. Gather all exhibits and prepare for filing.
11/22/2022	Hendricks, Kara B.	1000224498	2/14/2023	1.3	\$624.33	Revise stipulation for sale of Via Regina property and prepare email to A. Grigsby regarding same;
11/23/2022	Ewing, Kyle	1000224498	2/14/2023	0.4	\$136.00	Review and revise draft stipulation to sell via Regina property in preparation for sending the same to A. Grigsby; conference with K. Hendricks re: the same
11/23/2022	Ewing, Kyle	1000224498	2/14/2023	0.5	\$170.00	Review K. Hendrick's draft email to A. Grigsby (counsel for P. Beasley) re: Paula signing stipulation to sell via Regina property; revise the same and send to Grigsby; conference with K. Hendricks re: the same
11/23/2022	Hendricks, Kara B.	1000224498	2/14/2023	0.2	\$96.05	Confer with K. Ewing to finalize stipulation and correspondence to A. Grigsby regarding sale of Via Regina;
11/28/2022	Hendricks, Kara B.	1000224498	2/14/2023	0.8	\$384.20	Attention to email from A. Grigsby regarding stipulation and follow-up with G. Winkler (.3); Update stipulation and send to G. Ogata requesting assistance in obtaining signatures (.5);
12/1/2022	Hendricks, Kara B.	1000224438	2/14/2023	0.1	\$48.02	Review minute order regarding hearing on Grigsby motion to compel and forward to W. Schuller;
12/7/2022	Hendricks, Kara B.	1000224438	2/14/2023	0.1	\$48.02	Attention to email from A. Grigsby regarding Via Regina sale;
12/16/2022	Ewing, Kyle	1000224438	2/14/2023	2.1	\$714.00	Participate in hearing on motion to compel as to Grigsby and P. Beasley; follow-up with K. Hendricks, the Receiver, and counsel for the SEC
12/15/2022	Hendricks, Kara B.	1000224438	2/14/2023	3.7	\$1,776.92	Prepare for hearing on Grigsby/Beasley Motion to compel, follow-up with G. Winkler on document request pieces and review other filings relating to hearing matters;
12/16/2022	Hendricks, Kara B.	1000224438	2/14/2023	0.8	\$384.20	Confer with G. Winkler, K. Ewing and SEC counsel after Motion to compel and prior to status hearing regarding pending issues and next steps;
12/16/2022	Hendricks, Kara B.	1000224438	2/14/2023	2.1	\$1,008.52	Participate in hearing on motion to compel as to Grigsby and P. Beasley;
12/29/2022	Hendricks, Kara B.	1000224438	2/14/2023	0.4	\$192.10	Review transcript from Beasley/Grigsby order to show cause hearing and dates and information required to be produced and forward to Receiver;
12/27/2022	Hendricks, Kara B.	1000224438	2/14/2023	0.2	\$96.05	Telephone call from W. Scheuller regarding hearing and G-Wagon;
12/28/2022	Hendricks, Kara B.	1000224438	2/14/2023	0.1	\$48.02	Telephone call from W. Schuller regarding hearing on motion to compel and court direction;
1/20/2023	Ewing, Kyle	1000315088	5/15/2023	0.2	\$68.00	Email communication with E. Escobar-Gaddi and K. Hendricks re: receipt of documents re: P. Beasley's potentially improper use of receivership property from A. Grigsby, including cash, credit cards, and proceeds from sale of Ferrari, Aston Martin, and G. Wagon; begin reviewing list of files provided
1/21/2023	Ewing, Kyle	1000315088	5/15/2023	2	\$680.00	Initial analysis of documents provided by A. Grigsby in response to Court's order to produce documents relating to assets sold by Beasleys and potential use of the same to pay P. Beasley's legal fees (1.3), draft and transmit email memo re: the same to AFS (.5), communication with K. Hendricks re: approach for analyzing the same and supplementing the Receiver's motion for an OSC as necessary/appropriate (.2)
1/23/2023	Hendricks, Kara B.	1000315088	5/15/2023	0.5	\$240.13	Correspond with K. Ewing regarding Paula Beasley documents; Review information from G. Winkler regarding recording and next steps and follow-up with J. delCastillo;
1/27/2023	Ewing, Kyle	1000315088	5/15/2023	0.3	\$102.00	Review B. Tranquilo's notes from a review of Beasley's documents; confer with K. Hendricks re: approach to renewed motion for an OSC re: contempt of A. Grigsby and P. Beasley; plan and prepare for drafting the same
2/3/2023	Ewing, Kyle	1000315147	5/15/2023	0.6	\$204.00	Email communication with AFS (M. Chavez and J. Hall) re: Chavez's analysis of documents produced by Grigsby and missing items; confer with K. Hendricks re: approach to the same

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Date	TKPR Name	Bill Num	Bill Date	Bl Hrs	Billed Amt	Narrative
2/21/2023	Hendricks, Kara B.	1000315147	5/15/2023	0.3	\$144.08	Request C. Spaulding's assistance with Grigsby meet and confer letter and get update from K. Ewing regarding review of information received for Grigsby and information needed;
2/28/2023	Spaulding, Christian	1000315147	5/15/2023	3.2	\$1,020.00	Evaluate transcript from December 16, 2022 hearing on Motion to Compel Re: Grigsby and P. Beasley. Review documents produced in response to court order.
2/28/2023	Spaulding, Christian	1000315147	5/15/2023	1.9	\$605.62	Draft letter to A. Grigsby regarding insufficient document production.
3/1/2023	Hendricks, Kara B.	1000315185	5/15/2023	0.2	\$96.05	Follow-up with K. Ewing regarding Grigsby analysis and next steps in conjunction with turnover demand;
3/2/2023	Ewing, Kyle	1000315185	5/15/2023	2.1	\$714.00	Review and revise draft correspondence to A. Grigsby drafted by C. Spaulding; email communication with Spaulding and K. Hendricks re: the same
3/2/2023	Hendricks, Kara B.	1000315185	5/15/2023	0.2	\$96.05	Discuss Grigsby letter and anticipated motion to compel with K. Ewing;
3/2/2023	Spaulding, Christian	1000315185	5/15/2023	0.2	\$63.75	Emails with team regarding draft letter to A. Grigsby regarding deficient productions.
3/6/2023	Hendricks, Kara B.	1000315185	5/15/2023	0.2	\$96.05	Review correspondence from A. Grigsby and follow-up regarding discussion with P. Beasley;
3/9/2023	Hendricks, Kara B.	1000315185	5/15/2023	0.1	\$48.03	Review information for call with A. Grigsby;
3/9/2023	Hendricks, Kara B.	1000315185	5/15/2023	1.2	\$576.30	Call with A. Grigsby regarding Paula Beasley assets and turnover(.7); Prepare detailed email to A. Grigsby confirming discussion and outlining matters to be addressed in his response (.5);
3/9/2023	Ewing, Kyle	1000315185	5/15/2023	0.9	\$306.00	Participate in meet and confer with A. Grigsby and K. Hendricks; plan and prepare for the same and confer re: strategy going forward with K. Hendricks and C. Spaulding
3/23/2023	Hendricks, Kara B.	1000315185	5/15/2023	0.1	\$48.03	Respond to email from A. Gigsby and follow-up with C. Spaulding regarding motion;
3/23/2023	Spaulding, Christian	1000315185	5/15/2023	0.2	\$63.70	Confer with K. Hendricks regarding status of documents to be turned over by A. Grigsby and motion related to the same.
3/24/2023	Spaulding, Christian	1000315185	5/15/2023	0.2	\$63.75	Communications with team regarding receipt of any documents from A. Grigsby.
3/26/2023	Spaulding, Christian	1000315185	5/15/2023	2	\$637.50	Begin draft of Motion For Order to Show Cause Why A. Grigsby and P. Beasley Should not be held in contempt
3/27/2023	Hendricks, Kara B.	1000315185	5/15/2023	0.6	\$288.15	Initial review of documents from A. Grigsby and prepare email to G. Winkler regarding same (.4); Follow-up with C. Spaulding regarding review of information from A. Grigsby and related motion (.2);
3/27/2023	Ewing, Kyle	1000315185	5/15/2023	0.2	\$68.00	Communication with K. Hendricks and C. Spaulding re: additional documents provided by A. Grigsby on 3/24 and strategy for reviewing and renewing motion for an order to show cause and for turnover of assets
3/27/2023	Spaulding, Christian	1000315185	5/15/2023	4.1	\$1,306.88	Evaluate documents produced by A. Grigsby including consideration of amounts stated in various declarations as compared to documents produced.
3/28/2023	Hendricks, Kara B.	1000315185	5/15/2023	0.2	\$96.05	Confer with C. Spaulding regarding Grigsby document review and motion and review emails regarding same;
3/28/2023	Ewing, Kyle	1000315185	5/15/2023	0.6	\$204.00	Follow up communication with K. Hendricks and C. Spaulding re: additional documents provided by A. Grigsby on 3/24 and strategy for reviewing and renewing motion for an order to show cause and for turnover of assets (.5); follow up with M. Chavez (AFS) re: the same (.1).
3/28/2023	Spaulding, Christian	1000315185	5/15/2023	0.2	\$63.75	Emails with team regarding Aaron Grigsby's second production of documents.
3/29/2023	Hendricks, Kara B.	1000315185	5/15/2023	0.1	\$48.03	Correspond with J. del Castillo regarding correspondence from A. Grigsby;
3/29/2023	Spaulding, Christian	1000315185	5/15/2023	3.3	\$1,051.88	Analysis of prior proceedings and begin draft of Motion for Order to Show Cause why A. Grigsby and P. Beasley should not be held in contempt.
3/31/2023	Spaulding, Christian	1000315185	5/15/2023	4.5	\$1,434.38	Continue evaluation of documents and information provided by A. Grigsby and draft of Motion for Order to Show Cause.
4/2/2023	Spaulding, Christian	1000395478	8/14/2023	1.5	\$478.12	Evaluate and document funds actually demonstrated through Grigsby's second production of documents as compared to amounts purportedly received by P. Beasley and spreadsheet regarding the same. Confer with team as to inclusion in Motion for Order to Show Cause.
4/3/2023	Ewing, Kyle	1000395478	8/14/2023	0.2	\$68.00	Review analysis of latest Grigsby document production provided by C. Spaulding in preparation for reviewing and editing draft renewed motion regarding the deficiency of the same

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4/3/2023	Hendricks, Kara B.	1000395478	8/14/2023	0.4	\$192.10	Attention to emails from C. Spaulding and K. Ewing regarding Grigsby/Paula Beasley document review motion and related follow-up regarding next steps;
4/3/2023	Spaulding, Christian	1000395478	8/14/2023	3.5	\$1,115.62	Evaluate amounts actually demonstrated through production of documents and information by A. Grigsby(2.1); Draft summary of the same to team and inquire on status(1.4).
4/3/2023	Spaulding, Christian	1000395478	8/14/2023	0.3	\$95.62	Emails with team regarding additional points and strategy for Motion for Order to Show Cause Re: A. Grigsby and P. Beasley.
4/6/2023	Ewing, Kyle	1000395478	8/14/2023	0.1	\$34.00	Review and edit C. Spaulding's draft motion for order to show cause and for turnover from Beasley/Grigsby; communication with K. Hendricks and C. Spaulding re: the same (XX); review Grigsby document productions, prior court order, and correspondence in conjunction with the same
4/6/2023	Spaulding, Christian	1000395478	8/14/2023	7.5	\$2,390.62	Continue draft of Motion for Order to Show Cause and consideration of documents and information produced by A. Grigsby.
4/7/2023	Hendricks, Kara B.	1000395478	8/14/2023	0.5	\$240.13	Follow-up with C. Spaulding regarding Grigsby motion and subpoenas response;
4/7/2023	Spaulding, Christian	1000395478	8/14/2023	0.3	\$95.62	Strategize with K. Hendricks regarding presentation of evidence in Motion for Order to Show Cause re: A. Grigsby and P. Beasley.
4/7/2023	Spaulding, Christian	1000395478	8/14/2023	6.8	\$2,167.50	Continue and finalize draft of Motion for Order to Show Cause Re; A. Grigsby and P. Beasley.
4/7/2023	Spaulding, Christian	1000395478	8/14/2023	1.1	\$350.62	Gather exhibits to Motion for Order to Show Cause Re: P. Beasley and A. Grigsby.
4/10/2023	Morrill, Steph	1000395478	8/14/2023	3.1	\$542.50	Review draft motion for order to show cause regarding Paula Beasley and Ariba Grigsby and prepare index of document references, in order to begin compiling exhibits thereto; Draft and send email correspondence noting next steps and points of follow up regarding preparation of motion exhibits, to K.Hendricks and C.Spaulding;
4/10/2023	Ewing, Kyle	1000395478	8/14/2023	1	\$340.00	Review and analyze pleadings filed in Beasley criminal cases in connection with evaluating invoices produced by A. Grigsby evidencing P. Beasley's use of receivership assets to pay M. Beasley's legal defense costs in support of motion for order to show cause/compelling turnover against Grisby and P. Beasley
4/10/2023	Ewing, Kyle	1000395478	8/14/2023	5.3	\$1,802.00	Review and provide edits to motion for order to show cause/turnover re: P. Beasley and A. Grigsby; conference with K. Hendricks re: the same and finalize motion for filing
4/10/2023	Hendricks, Kara B.	1000395478	8/14/2023	0.3	\$144.08	Review and revise motion to seal and document produced by Grigsby and correspond with C. Spaulding regarding same;
4/10/2023	Hendricks, Kara B.	1000395478	8/14/2023	3.6	\$1,728.90	Review and revise motion to compel and for turnover relating to Grigsby and P. Beasley and request C. Spaulding assistance with motion to seal and declarations relating to same;
4/10/2023	Spaulding, Christian	1000395478	8/14/2023	0.5	\$159.37	Draft Motion for Leave to file exhibits to Motion for Order to Show Cause Under Seal.
4/10/2023	Spaulding, Christian	1000395478	8/14/2023	1.4	\$446.25	Finalize exhibits for Motion for Order to Show cause and confer with team regarding the same.
4/11/2023	Morrill, Steph	1000395478	8/14/2023	1.5	\$262.50	Referencing C.Spaulding review notes, begin pulling document references to the motion for order to show cause, and finalize each as an exhibit;
4/11/2023	Spaulding, Christian	1000395478	8/14/2023	0.2	\$63.75	Communications with team regarding preparation of Motion for Order to Show Cause to be filed.
4/12/2023	Morrill, Steph	1000395478	8/14/2023	1.4	\$245.00	Draft K.Hendricks declaration in support of motion to show cause and circulate for approval;
4/12/2023	Morrill, Steph	1000395478	8/14/2023	4	\$700.00	Referencing C.Spaulding review notes, continue pulling document references to the motion for order to show cause, and finalize each as an exhibit;
4/12/2023	Hendricks, Kara B.	1000395478	8/14/2023	0.2	\$96.05	Follow-up regarding finalizing Grigsby motion and exhibits and respond to questions regarding same;
4/12/2023	Ewing, Kyle	1000395478	8/14/2023	0.4	\$136.00	Further review of motion for order to show cause/for turnover re: P. Beasley and A. Grigsby, including exhibits and appendices to the same; communication with S. Morrill re: the same
4/12/2023	Spaulding, Christian	1000395478	8/14/2023	0.2	\$63.75	Confer with team regarding strategy for submitting documents with Motion for Order to Show Cause.

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4/13/2023	Morrill, Steph	1000395478	8/14/2023	0.8	\$140.00	Final pass review of motion for order to show cause against draft K.Hendricks declaration in support thereof, and advise C.Spaulding of additional brief references for inclusion in declaration; Annotate motion to include appendix pagination pin cites; Perform final review of motion to seal the appendix of exhibits;
4/13/2023	Morrill, Steph	1000395478	8/14/2023	3.3	\$577.50	Finalize exhibit set, and prepare appendix volumes for filing; Revise exhibit set in consideration of the revisions to K.Hendricks declaration in support of the motion for order to show cause, expanding the exhibit set from 5 to 15;
4/13/2023	Morrill, Steph	1000395478	8/14/2023	0.3	\$52.50	Draft appendix of exhibits to motion for order to show cause;
4/13/2023	Morrill, Steph	1000395478	8/14/2023	0.6	\$105.00	Final revisions to motion to seal; Revise appendix volume 1 with updated K.Hendricks declaration in support of motion for order to show cause;
4/13/2023	Ewing, Kyle	1000395478	8/14/2023	0.2	\$68.00	Final review of motion for order to show cause (P. Beasley and A. Grigsby) and exhibit appendices in preparation for filing; confer with GT team re: the same
4/13/2023	Ewing, Kyle	1000395478	8/14/2023	0.2	\$68.00	Research law and review appointment order in connection with determining Receiver's available discovery mechanisms for investigating whether newly discovered P. Beasley storage units house receivership assets and other concerns related to receivership property still in possession/custody of Beasleys; confer with K. Hendricks and email communication with G. Winkler re: the same
4/13/2023	Hendricks, Kara B.	1000395478	8/14/2023	0.6	\$288.15	Revise declaration in support of Grigsby motion to compel and review appendix and related exhibits;
4/13/2023	Hendricks, Kara B.	1000395478	8/14/2023	0.7	\$336.18	Correspond with C. Spaulding regarding exhibit questions and finalizing Grigsby motion to compel (.3); Follow-up with G. Winkler regarding finalizing same and discussion regarding related issues and communications with Beasley (.4);
4/13/2023	Spaulding, Christian	1000395478	8/14/2023	2.9	\$924.37	Finalize draft of Motion for Order to Show Cause Re: A. Grigsby and P. Beasley including drafting declaration of K. Hendricks, gathering exhibits and finalizing citations thereto.
4/14/2023	Ewing, Kyle	1000395478	8/14/2023	0.4	\$136.00	Email communication with G. Winkler re: yesterday's filing of the receiver's motion for an order to show cause (Beasley and Grigsby) and posting of pleadings to the receivership website; follow up re: order granting motion to seal and review the order
4/16/2023	Hendricks, Kara B.	1000395478	8/14/2023	0.1	\$48.03	Attention to minute order regarding motion to seal and attention to emails from G. Winkler and K. Ewing regarding same;
4/27/2023	Ewing, Kyle	1000395478	8/14/2023	1.1	\$374.00	Preliminary review of P. Beasley/Grigsby opposition to receiver's renewed motion for an order to show cause and/or turnover order in connection with forming strategy for responding to the same
4/27/2023	Ewing, Kyle	1000395478	8/14/2023	0.2	\$68.00	Email communication with G. Winkler, C. Spaulding, and K. Hendricks re: P. Beasley/Grigsby opposition to receiver's motion for an order to show cause and/or for turnover of assets
4/27/2023	Hendricks, Kara B.	1000395478	8/14/2023	0.2	\$96.05	Initial review of Grigsby response to motion to compel and correspond with G. Winkler regarding same;
4/28/2023	Ewing, Kyle	1000395478	8/14/2023	0.9	\$306.00	Further review of opposition to receiver's motion for turnover/order to show cause re: P. Beasley/Grigsby; confer with G. Winkler re: the same and outline receiver's arguments in reply with C. Spaulding
4/28/2023	Spaulding, Christian	1000395478	8/14/2023	0.3	\$95.68	Confer with K. Ewing regarding A. Grigsby response to Motion for Order to Show Cause and strategy in response.
5/1/2023	Ewing, Kyle	1000340006	6/9/2023	0.3	\$102.00	Discuss strategy for receiver's reply in support of motion for order to show cause re: P. Beasley and A. Grigsby with K. Hendricks and C. Spaulding (.2), follow up with K. Hendricks re: receiver's objections to various subpoenas served on receiver as third party and objections re: cost shifting (.1)
5/1/2023	Hendricks, Kara B.	1000340006	6/9/2023	0.2	\$96.05	Follow-up with C. Spaulding regarding reply in support of Grigsby motion to compel;

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5/2/2023	Ewing, Kyle	1000340006	6/9/2023	0.9	\$306.00	Preliminary review of documents produced in response to document request to JPM Chase re: Grigsby Iolta accounts in connection with determining whether they support receiver's position in reply in support of motion to show cause re: P. Beasley/Grigsby and email communication with K. Hendricks re: same.
5/2/2023	Spaulding, Christian	1000340006	6/9/2023	1.5	\$478.13	Evaluate production of documents from JPMC pertaining to A. Grigsby and confer with K. Ewing regarding the same.
5/3/2023	Hendricks, Kara B.	1000340006	6/9/2023	0.2	\$96.05	Follow-up with C. Spaulding regarding reply in support of Grigsby motion to compel;
5/3/2023	Spaulding, Christian	1000340006	6/9/2023	5.4	\$1,721.25	Finalize draft of Reply in Support of Motion for Order to Show Cause Re: Grigsby.
5/4/2023	Ewing, Kyle	1000340006	6/9/2023	2.5	\$850.00	Review and provide edits/comments to C. Spauldings draft reply in support of receiver's motion for an order to show cause re: P. Beasley and confer with Spaulding and K. Hendrick re: the same (2.3), follow up with G. Winkler and AFS team (.2)
5/4/2023	Hendricks, Kara B.	1000340006	6/9/2023	3.9	\$1,872.79	Review and revise reply in support of Grigsby motion to compel;
5/4/2023	Spaulding, Christian	1000340006	6/9/2023	0.7	\$223.11	Revise draft of Reply in Support of Motion for Order to Show Cause Re: Grigsby and communicate with team regarding filing of the same.
5/5/2023	Hendricks, Kara B.	1000340006	6/9/2023	0.1	\$48.03	Correspond with M. Pham regarding Grigsby request for confidentiality agreement;
5/5/2023	Spaulding, Christian	1000340006	6/9/2023	0.2	\$63.75	Evaluate recent filings and notice of appearance of counsel for Aaron Grigsby.
5/19/2023	Hendricks, Kara B.	1000340006	6/9/2023	1.1	\$528.28	Revise draft stipulation regarding confidentiality of Grigsby bank records and correspond with his counsel regarding concerns;
5/22/2023	Hendricks, Kara B.	1000340006	6/9/2023	0.3	\$144.08	Telephone call with Grigsby's counsel regarding confidentiality agreement and follow-up with co-counsel for template utilized;
7/13/2023	Hendricks, Kara B.	1000400792	8/24/2023	0.3	\$144.08	Correspond with G. Winkler regarding pending Grigsby P. Beasley issues and provide requested documents;
7/13/2023	Spaulding, Christian	1000400792	8/24/2023	0.7	\$223.13	Communications with K. Hendricks and G. Winkler regarding documents produced by A. Grigsby and locate said documents and work with team to transfer to G. Winkler.
8/23/2023	Hendricks, Kara B.	1000458404	10/17/2023	0.9	\$432.23	Review transcript from hearing on motion to compel (Grigsby and Paula) and follow-up with C. Spaulding regarding issues for upcoming hearing;
8/24/2023	Hendricks, Kara B.	1000458404	10/17/2023	1.4	\$672.35	Review pleadings and prepare for hearing on motion to compel/motion for order to show cause;
8/24/2023	Hendricks, Kara B.	1000458404	10/17/2023	0.2	\$96.05	Telephone call with G. Winkler regarding Grigsby/Paula Beasley hearing;
8/25/2023	Hendricks, Kara B.	1000458404	10/17/2023	3.2	\$1,536.80	Finalize outline for hearing on motion to compel discovery from P. Beasley and A. Grigsby, confer with G. Winkler regarding same and participate in hearing;
8/25/2023	Spaulding, Christian	1000458404	10/17/2023	1.3	\$414.37	Review filings and documents related to Motion to Compel Re: Paula Beasley and Aaron Grigsby in advance of hearing on the same.
8/25/2023	Spaulding, Christian	1000458404	10/17/2023	1.5	\$478.12	Meeting with G. Winkler and team in advance of hearing on Motion to Compel or for Order to Show Cause why Paula Beasley and Aaron Grigsby should not be held in contempt.
8/29/2023	Hendricks, Kara B.	1000458404	10/17/2023	0.1	\$48.03	Follow-up with A. Grigsby to confer regarding court order;
9/19/2023	Hendricks, Kara B.	1000453632	10/16/2023	0.9	\$432.23	Review order on Grigsby motion to withdraw (.1); Attention to Order requiring issues with P. Beasley and A. Grigsby to be resolved by September 29 and identify who is responsible for each category and provide same to G. Winkler (.7); Follow-up with A. Grigsby and provide outline for discussion regarding court order (.1);
9/22/2023	Spaulding, Christian	1000453632	10/16/2023	0.3	\$95.63	Communications with K. Hendricks and S. Morrill regarding tax payments by P. Beasley on Schoofey property.
9/22/2023	Spaulding, Christian	1000453632	10/16/2023	0.6	\$191.25	Evaluate status of tax documents provided by P. Beasley with respect to Schoofey property and search property tax status with county assessor.
9/24/2023	Hendricks, Kara B.	1000453632	10/16/2023	0.2	\$96.05	Review minute order and transcript regarding required compliance by P. Beasley and A. Grigsby;

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9/25/2023	Hendricks, Kara B.	1000453632	10/16/2023	1.9	\$912.47	Review time line and portions of hearing transcript relating to motion to compel P. Beasley and A. Grigsby (.8); Respond to email from D. Kajioka and follow-up with G. Winkler regarding A. Grigsby issues; Telephone call from D. Kajioka's office and follow-up (.4); Attempt to participate in meeting with A. Grigsby's counsel and G. Winkler (no appearance by Grigsby or Kajoika) (.3); Respond to additional email from D. Kajioka and provide information regarding items to be resolved by September 29 court deadline (.2); Follow-up with C. Spaulding regarding next steps (.2);
9/26/2023	Spaulding, Christian	1000453632	10/16/2023	0.3	\$95.63	Meeting with S. Morrill and K. Hendricks regarding status of A. Grigsby and P. Beasley matters, upcoming deadlines, and communications with opposing counsel.
9/27/2023	Hendricks, Kara B.	1000453632	10/16/2023	0.7	\$336.17	Telephone call with G. Winkler regarding documents requested from government and P. Beasley; Prepare declaration for P. Beasley;
9/28/2023	Hendricks, Kara B.	1000453632	10/16/2023	0.1	\$48.02	Correspond with G. Winkler regarding P. Beasley matters;
9/28/2023	Spaulding, Christian	1000453632	10/16/2023	0.3	\$95.63	Review declaration of Paula Beasley
9/29/2023	Hendricks, Kara B.	1000453632	10/16/2023	0.4	\$192.10	Attention to letter from D. Kajioka regarding A. Grigsby and follow-up with G. Winkler; Correspond with C. Spaulding regarding necessary motions;
9/29/2023	Spaulding, Christian	1000453632	10/16/2023	0.2	\$63.75	Communications with team regarding resolution proposal from A. Grigsby.
10/1/2023	Hendricks, Kara B.	1000483927	11/8/2023	2.3	\$1,104.57	Prepare response to Kajioka letter re: Grigsby (1.6); Prepare notice relating to status of compliance with court order by Grigsby and P. Beasley (.6); Send draft of same to G. Winkler for review and comment (.1);
10/2/2023	Spaulding, Christian	1000483927	11/8/2023	3.8	\$1,211.25	Begin draft of Motion to Find A. Grigsby in contempt.
10/2/2023	Spaulding, Christian	1000483927	11/8/2023	5.3	\$1,689.37	Evaluate prior proceedings, filings and transcripts for information pertinent to upcoming motion to find A. Grigsby in contempt.
10/2/2023	Hendricks, Kara B.	1000483927	11/8/2023	1	\$480.25	Revise letter to A. Grigsby counsel to incorporate G. Winkler comments and update notice to be filed with court regarding compliance with court's directive;
10/3/2023	Spaulding, Christian	1000483927	11/8/2023	5.9	\$1,880.62	Continue draft of Motion to Find A. Grigsby in contempt
10/3/2023	Spaulding, Christian	1000483927	11/8/2023	2.2	\$701.25	Research additional case law in support of motion to find A. Grigsby in contempt.
10/4/2023	Spaulding, Christian	1000483927	11/8/2023	6.9	\$2,199.37	Continue and finalize draft of Motion to find A Grigsby in contempt.
10/4/2023	Spaulding, Christian	1000483927	11/8/2023	1.5	\$478.12	Begin draft of Motion for Turnover Re. A. Grigsby.
10/5/2023	Spaulding, Christian	1000483927	11/8/2023	2.9	\$924.37	Evaluate additional authority in support of Motion for Turnover Re: A. Grigsby.
10/5/2023	Spaulding, Christian	1000483927	11/8/2023	8.5	\$2,709.46	Continue draft of Motion for turnover Re: A. Grigsby
10/5/2023	Hendricks, Kara B.	1000483927	11/8/2023	1.7	\$816.42	Review and revise motion for contempt relating to A. Grigsby and send to G. Winkler for comment;
10/6/2023	Spaulding, Christian	1000483927	11/8/2023	3.5	\$1,115.62	Continue and finalize draft of Motion for Turnover re: A. Grigsby.
10/6/2023	Hendricks, Kara B.	1000483927	11/8/2023	0.9	\$432.22	Update Grigsby motion for contempt and incorporate G. Winkler comments and review supporting declaration (.6); Review and revise motion for turnover directed to Grigsby and provide G. Winkler draft of same for review (.3);
10/9/2023	Hendricks, Kara B.	1000483927	11/8/2023	0.1	\$48.02	Attention to correspondence and \$20 check from A. Grigsby and update G. Winkler;
10/9/2023	Hendricks, Kara B.	1000483927	11/8/2023	0.6	\$288.15	Prepare declaration in support of Grigsby motion for turnover and update motion and finalize same;
10/20/2023	Hendricks, Kara B.	1000483927	11/8/2023	0.3	\$144.07	Review response from A. Grigsby to motion for contempt and provide guidance to C. Spaulding regarding reply brief;
10/20/2023	Spaulding, Christian	1000483927	11/8/2023	0.3	\$95.62	Evaluate Grigsby's Response to Motion for Contempt.
10/20/2023	Spaulding, Christian	1000483927	11/8/2023	3.8	\$1,211.25	Gather and review prior proceedings and transcripts for relevant citations in advance of drafting Reply in Support of Motion to find A. Grigsby in contempt.
10/20/2023	Spaulding, Christian	1000483927	11/8/2023	2.1	\$669.37	Begin draft of Reply in Support of Motion to Find A. Grigsby in Contempt.
10/23/2023	Hendricks, Kara B.	1000483927	11/8/2023	0.2	\$96.05	Review Grigsby response to motion for turnover and follow-up with C. Spaulding regarding reply;
10/25/2023	Hendricks, Kara B.	1000483927	11/8/2023	0.2	\$96.05	Follow-up with C. Spaulding regarding Grigsby reply briefs;
10/25/2023	Spaulding, Christian	1000483927	11/8/2023	5.9	\$1,880.62	Draft Reply in Support of Motion to Find Aaron Grigsby in Contempt.

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10/25/2023	Spaulding, Christian	1000483927	11/8/2023	2.1	\$669.37	Evaluate previous hearing transcripts and Grigsby's response to Motion to find Aaron Grigsby in Contempt.
10/25/2023	Spaulding, Christian	1000483927	11/8/2023	1.4	\$446.25	Evaluate relevant case law pertaining to payment of attorneys' fees on credit cards backed by receivership funds as it relates to reply in support of Grigsby motions.
10/26/2023	Hendricks, Kara B.	1000483927	11/8/2023	0.4	\$192.10	Follow-up with C. Spaulding regarding Grigsby reply brief and review and revise same;
10/26/2023	Spaulding, Christian	1000483927	11/8/2023	3.9	\$1,243.12	Continue and finalize draft of Reply in Support of Motion to find Aaron Grigsby in Contempt.
10/26/2023	Spaulding, Christian	1000483927	11/8/2023	0.3	\$95.62	Communications with team regarding draft of Reply in Support of Motion to Find Aaron Grigsby in Contempt.
10/26/2023	Spaulding, Christian	1000483927	11/8/2023	0.2	\$63.75	Communications with K. Hendricks regarding draft of Reply in Support of Motion to find Aaron Grigsby in contempt.
10/26/2023	Spaulding, Christian	1000483927	11/8/2023	0.2	\$63.75	Coordinate filing of Reply in Support of Motion to Find Aaron Grigsby in contempt.
10/26/2023	Spaulding, Christian	1000483927	11/8/2023	0.2	\$63.75	Email to G. Winkler regarding draft Reply in Support of Motion for Order Directing Turnover from Aaron Grigsby.
10/26/2023	Spaulding, Christian	1000483927	11/8/2023	2.4	\$765.00	Begin draft of Reply in Support of Motion for Order Directing Turnover from Aaron Grigsby.
10/27/2023	Hendricks, Kara B.	1000483927	11/8/2023	0.1	\$48.02	Attention to email from G. Winkler regarding Grigsby reply and follow-up with C. Spaulding regarding finalizing same;
10/27/2023	Spaulding, Christian	1000483927	11/8/2023	6.9	\$2,199.37	Draft Reply in Support of Motion for Order Directing Turnover of Receivership Property from Aaron Grigsby.
10/27/2023	Spaulding, Christian	1000483927	11/8/2023	0.4	\$127.50	Review and finalize draft of Reply in Support of Motion to Find Aaron Grigsby in Contempt and communicate with team regarding the same.
10/30/2023	Hendricks, Kara B.	1000483927	11/8/2023	3.1	\$1,488.77	Revise reply in support of Grigsby motion for turnover and correspond with G. Winkler regarding same;
12/5/2023	Spaulding, Christian	1000534223	1/4/2024	0.2	\$63.75	Communications with team regarding status of P. Beasley compliance with court's orders.
12/5/2023	Spaulding, Christian	1000534223	1/4/2024	0.4	\$127.50	Locate current status of P. Beasley's payments of taxes on Schoofey property.
12/11/2023	Hendricks, Kara B.	1000534223	1/4/2024	0.4	\$192.20	Begin preparation for upcoming hearing on motions to compel;
12/13/2023	Ewing, Kyle	1000534223	1/4/2024	0.4	\$136.00	Begin preparing for tomorrow's evidentiary hearing re: A. Grigsby's contempt; conference with K. Hendricks and G. Winkler re: the same
12/13/2023	Hendricks, Kara B.	1000534223	1/4/2024	4.6	\$2,209.15	Prepare for hearing on Grigsby motion to compel and status report (1.9); Attend and participate in hearing (1.7); Discuss next steps with G. Winkler (.6); Confer with K. Ewing regarding hearing and needs for rescheduled motion for turnover (.2); Request C. Spaulding assistance with Grigsby production review in preparation for hearing (.2);
12/13/2023	Spaulding, Christian	1000534223	1/4/2024	0.3	\$95.62	Evaluate record of payment of property taxes by P. Beasley and communicate with G. Winkler with respect outstanding amount and next due date.
12/13/2023	Spaulding, Christian	1000534223	1/4/2024	0.2	\$63.75	Communications with K. Hendricks following hearing on Motion to Compel and needs for continued hearing set for Thursday 12/14
12/13/2023	Spaulding, Christian	1000534223	1/4/2024	0.9	\$286.87	Begin gathering documents in advance of continued hearing on A. Grigsby Motion for Contempt.
12/14/2023	Ewing, Kyle	1000534223	1/4/2024	3.1	\$1,054.00	Attend hearing on receiver's motions for turnover and contempt against A. Grigsby and assist K. Hendricks with argument of the same and prepare for potential cross-examination of Mr. Grigsby
12/14/2023	Ewing, Kyle	1000534223	1/4/2024	4.9	\$1,666.00	Plan and prepare for today's evidentiary hearing re: A. Grigsby's contempt of court with C. Spaulding, K. Hendricks, and G. Winkler; review briefs and documents discovered in connection with Grigsby's misconduct in connection with the same and prepare witness and argument outlines; prepare to cross examine Grigsby w/r/t receipts of cash and other funds
12/14/2023	Spaulding, Christian	1000534223	1/4/2024	3.6	\$1,147.50	Attend hearing on Motion to Find Aaron Grigsby in Contempt
12/14/2023	Spaulding, Christian	1000534223	1/4/2024	1.7	\$541.87	Gather relevant documents and produce timeline for hearing of pertinent documents.
12/14/2023	Spaulding, Christian	1000534223	1/4/2024	3.9	\$1,243.12	Evaluate records produced by A. Grigsby as it relates to additional information presented by P. Beasley.
12/14/2023	Spaulding, Christian	1000534223	1/4/2024	0.6	\$191.25	Meeting with G. Winkler, K. Hendricks, and K. Ewing regarding first hearing on A. Grigsby Motion to Compel and upcoming hearing on same matter.

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12/14/2023	Hendricks, Kara B.	1000534223	1/4/2024	2.1	\$1,008.52	Participate in Grigsby hearing and debrief with G. Winkler regarding next steps;
12/14/2023	Hendricks, Kara B.	1000534223	1/4/2024	3.6	\$1,728.90	Prepare outline for evidentiary hearing and matters for further review relating to same, review case law regarding requested relief and rule of professional responsibility potentially at issues;
12/15/2023	Spaulding, Christian	1000534223	1/4/2024	0.4	\$127.50	Communications with team regarding fees relate to A. Grigsby to be located for Motion for Attorneys Fees following contempt hearing.
12/15/2023	Spaulding, Christian	1000534223	1/4/2024	0.2	\$63.75	Communications with team regarding court ruling on Grigsby Contempt Proceeding including fees to be charged for noncompliance.
12/15/2023	Spaulding, Christian	1000534223	1/4/2024	0.3	\$95.62	Review course of dispute against A. Grigsby for pertinent dates related to Motion for Attorneys Fees.
12/15/2023	Hendricks, Kara B.	1000534223	1/4/2024	0.2	\$96.05	Email D. Kajioka regarding Grigsby payment and provide wire instructions and opportunity to discuss;
12/15/2023	Hendricks, Kara B.	1000534223	1/4/2024	0.2	\$96.05	Request S. Morrill's assistance with Grigsby fee motion and update regarding hearing;
12/19/2023	Hendricks, Kara B.	1000534223	1/4/2024	0.1	\$48.02	Follow-up with S. Morrill regarding Grigsby motion for fees based on court order;
12/19/2023	Morrill, Steph	1000534223	1/4/2024	1	\$175.00	Reach out to L.Carpenter for export of attorney fees for June 2022 - present, in advance of preparing motion for fees related to 12/14/23 hearing regarding Aaron Grigsby (.1); Review spreadsheet for inclusion of pertinent billing details and follow up with L.Carpenter regarding December 2023 (not yet billed) time and when to generate same (.2); Begin review of attorney fees to identify any which relate to Aaron Grigsby and Paula Beasley (.7);
12/21/2023	Hendricks, Kara B.	1000534223	1/4/2024	0.1	\$48.02	Review and respond to email from D. Kajioka regarding A. Grigsby and follow-up with G. Winkler regarding same;
12/21/2023	Spaulding, Christian	1000534223	1/4/2024	0.2	\$63.85	Communications with team and opposing counsel regarding A. Grigsby, including response to Court order and Grigsby's malpractice insurance counsel.
12/28/2023	Spaulding, Christian	1000534223	1/4/2024	1.9	\$605.62	Begin draft of Memorandum of Fees regarding proceedings against A. Grigsby.
12/28/2023	Hendricks, Kara B.	1000534223	1/4/2024	0.2	\$96.05	Confer with S. Morrill and C. Spaulding regarding Grigsby fee motion and information needed to complete same;
12/28/2023	Morrill, Steph	1000534223	1/4/2024	1.8	\$315.00	Continue review of billing entries from August 2022 through to current, to identify any entry related to Aaron Grigsby and his representation of Paula Grigsby, in preparation of motion for attorneys fees;
12/29/2023	Morrill, Steph	1000534223	1/4/2024	6.2	\$1,085.00	Continue review of billing entries from August 2022 through to current, to identify any entry related to Aaron Grigsby and his representation of Paula Grigsby, in preparation of motion for attorneys fees (5.9); provide billing spreadsheet to C. Spaulding for review (.3)
12/31/2023	Spaulding, Christian	1000534223	1/4/2024	2.3	\$733.12	Begin analysis of charges related to A. Grigsby.
				Total: 371.3	\$129,348.29	

EXHIBIT B

EXHIBIT B

GT Invoices



Invoice No. : 1000096060
File No. : 209375.010100
Bill Date : October 3, 2022

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

Attn: Geoff Winkler

INVOICE

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

THIS INVOICE REPLACES INVOICE 1000055815

Total Fees: \$ 60,998.18

Expenses:

Parking Charges 4.00

Total Expenses: \$ 4.00

Current Invoice: \$ 61,002.18

Previous Balance (see attached statement): \$ 104,015.86

Total Amount Due: \$ 165,018.04

KBH:LC
Tax ID: 13-3613083



Invoice No.: 1000096060
File No.: 209375.010100

REMITTANCE ADVICE

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

CLIENT NAME: WINKLER, GEOFF
FILE NUMBER: 209375.010100
INVOICE NUMBER: 1000096060*
BILLING PROFESSIONAL: Kara B. Hendricks

Current Invoice:	\$	61,002.18
Previous Balance:	\$	104,015.86
Total Amount Due:	\$	165,018.04

FOR YOUR CONVENIENCE, WIRE TRANSFER FUNDS TO:

For Wire Instructions:

Bank: WELLS FARGO BANK
ABA #: 121000248

For ACH Instructions:

Bank: WELLS FARGO BANK
ABA#: 063107513

CREDIT TO: GREENBERG TRAUIG DEPOSITORY ACCOUNT
ACCOUNT #: 2000014648663

PLEASE

REFERENCE: CLIENT NAME: WINKLER, GEOFF
FILE NUMBER: 209375.010100
INVOICE NUMBER: 1000096060*
BILLING
PROFESSIONAL: Kara B. Hendricks

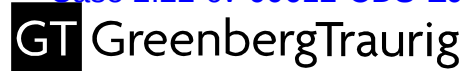
IF YOU WISH TO PAY BY CHECK PLEASE REMIT TO THE ADDRESS BELOW:

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

Wire fees may be assessed by your bank.

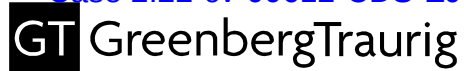
*** If paying more than one invoice, please reference all invoice numbers in wiring instructions.**

KBH:LC
Tax ID: 13-3613083



Invoice No.: 1000096060
File No. : 209375.010100

KBH:LC
Tax ID: 13-3613083



Invoice No. : 1000096060
File No. : 209375.010100

Account Statement

<u>Date</u>	<u>Invoice #</u>	<u>Fees Due</u>	<u>Expenses Due</u>	<u>Other Due</u>	<u>Total Due</u>
07/19/22	1000035547	16,627.52	0.00	0.00	16,627.52
09/14/22	1000083870	87,071.54	316.80	0.00	87,388.34
	Totals:	\$ 103,699.06	\$ 316.80	\$ 0.00	\$ 104,015.86

KBH:LC
Tax ID: 13-3613083

Invoice No.: 1000096060
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Description of Professional Services Rendered:

TASK CODE: GW001 ASSET ANALYSIS AND RECOVERY

<u>DATE</u>	<u>TIMEKEEPER</u>	<u>DESCRIPTION</u>	<u>HOURS</u>	<u>AMOUNT</u>
06/06/22	Mark E. Ferrario	Telephone conference with Kyle Ewing regarding current status and next steps.	0.30	184.88
07/01/22	Kara B. Hendricks	Call with Kevin Anderson and G. Winkler regarding Judd property and filings.	0.60	288.15
07/01/22	Kara B. Hendricks	Respond to email from K. Anderson after confirming funds received.	0.10	48.02
07/01/22	Kara B. Hendricks	Review emails regarding Bancorp Investments.	0.10	48.02
07/01/22	Kara B. Hendricks	Prepare supplement to motion to compel per order correspond with team regarding prior communication and incorporate comments from team into supplement.	1.10	528.27
07/01/22	Kara B. Hendricks	Call with SEC counsel to discuss Response to Judd Motion.	0.30	144.07
07/01/22	Kara B. Hendricks	Review FBI list of items seized and forward	0.10	48.02
07/01/22	Kara B. Hendricks	Wire instruction confirmation call from K. Anderson.	0.10	48.02
07/01/22	Kara B. Hendricks	Review emails regarding Coinbase transfer.	0.10	48.02
07/01/22	Kara B. Hendricks	Review and revise updated stipulation regarding Judd Motion to Compel.	0.20	96.05
07/02/22	Kyle Ewing	Review and analyze K. Anderson's (counsel for Judd) email letter re: contact between receiver and Judd outside of presence of counsel; research law in connection with the same; provide analysis to K. Hendricks and J. Hicks.	0.20	68.00
07/02/22	Jason Hicks	Review draft of proposed motion to approve personal property and aircraft sales and strategize with receivership team re same.	0.10	36.12
07/02/22	Jason Hicks	Review supplemental notice of non opp to motion to compel re Judd / VanCott turnover and communications/letters related to same.	0.10	36.12
07/02/22	Jason Hicks	Review non-party US Bancorp Investment Inc.'s certified statement - ECF 133 - per court order and communications with receivership team related thereto.	0.10	36.12
07/02/22	Jason Hicks	Review correspondence with Fabian VanCott re: wire transfer of funds held - partial- for Judd.	0.10	36.12
07/02/22	Jason Hicks	Review Fabian VanCott (Judd) redlines to stipulation re Motion to Compel and correspondence related thereto.	0.20	72.25
07/05/22	Cynthia L. Ney	Participate in team meeting and review	1.10	192.50

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Description of Professional Services Rendered

		recent court filings and email communications.		
07/06/22	Kara B. Hendricks	Review certified statement from US Bank and follow-up with team.	0.10	48.02
07/06/22	Kara B. Hendricks	Correspond with D. Zaro re: K. Dean.	0.10	48.02
07/06/22	Kara B. Hendricks	Follow-up with J. deCastillo regarding pending matters and turnover questions.	0.20	96.05
07/06/22	Kara B. Hendricks	Prepare correspondence to Oberheiden PC, M. Peters, K. Dean, and J. Sellers regarding funds held in trust.	1.60	768.40
07/06/22	Kara B. Hendricks	Email D. Huish and provide draft stipulation and order for release of funds.	0.10	48.02
07/06/22	Kara B. Hendricks	Review Judd statement regarding accounting and follow-up regarding exhibits.	0.20	96.05
07/06/22	Kara B. Hendricks	Review correspondence from K. Anderson regarding Judd Condo in Bahamas and provide new info to G. Winkler.	0.10	48.02
07/06/22	Jason Hicks	Review correspondence from Fabian VanCott -Judd- regarding Bahamas condominium.	0.10	36.12
07/06/22	Jason Hicks	Revise letters to Peters and Oberheiden - Judd counsel- regarding turnover and review communications regarding same.	0.30	108.37
07/06/22	Jason Hicks	Review and comment re: proposed order on motion to authorize procedure for sale of assets (ECF No 139).	0.10	36.12
07/06/22	Jason Hicks	Review receivership team task list (status and action items) and assist with assets recovery plan.	0.10	36.12
07/06/22	Jason Hicks	Review Judd's statement re: accounting (ECF No 141) and exhibits and strategize with receivership team re: same.	0.40	144.50
07/06/22	Jason Hicks	Review US Bank NA certified statement (ECF No 140).	0.10	36.12
07/06/22	Cynthia L. Ney	Review file and forward information to K.Hendricks for review.	0.30	52.50
07/07/22	Kara B. Hendricks	Review and analyze amended complaint and motion to amend preliminary injunction to assess impact on current recovery efforts.	1.20	576.30
07/07/22	Kara B. Hendricks	Revise Tanner stipulation per request of D. Huish and correspond regarding same.	0.10	48.02
07/07/22	Kara B. Hendricks	Correspond with G. Winkler regarding Bentley and other Beasley cars.	0.30	144.07
07/07/22	Kara B. Hendricks	Review correspondence with updated info regarding Judd attorneys and follow-up with E. Escobar-Gaddi regarding finalizing letters.	0.20	96.05
07/07/22	Kara B. Hendricks	Correspond with G. Ogata for confirmation that all assets have been turned over.	0.20	96.05
07/07/22	Kara B. Hendricks	Email attorney Draskovich regarding information on car sales.	0.10	48.02

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Description of Professional Services Rendered

07/07/22	Kara B. Hendricks	Correspond with D. Zaro re: K. Dean.	0.20	96.05
07/07/22	Kara B. Hendricks	Follow-up regarding funds received by J. Sellers and email J. Sellers.	0.30	144.07
07/07/22	Kara B. Hendricks	Correspond with J. delCastillo regarding Michael Peters and communication from his counsel and address pending issues.	0.20	96.05
07/07/22	Kara B. Hendricks	Follow-up regarding property turnover motion and coordinate efforts with J. Del Castillo.	0.30	144.07
07/07/22	Kara B. Hendricks	Communicate with G. Winkler regarding new turnover information and withdrawal of motion to compel Bentley.	0.10	48.02
07/07/22	Kara B. Hendricks	Request real estate team look and draft deeds to accompany sales motion.	0.10	48.02
07/07/22	Kara B. Hendricks	Review information from K. Anderson regarding PAJ consulting and Abbey Hill property, research same and follow-up with G. Winkler.	0.50	240.12
07/07/22	Jason Hicks	Strategize with receiver and team regarding Ogata -Beasley- Bentley turnover, pending motion, and other vehicles sold on behalf of Beasley and next steps.	0.30	108.37
07/07/22	Jason Hicks	Communications from defendant counsel regarding compliance with turnover order/our follow up letters and compelling the same.	0.20	72.25
07/07/22	Jason Hicks	Formulate plan regarding PAJ consulting Inc and 210 Abbey Hill St. property turnover and liquidation (Beasley/Judd).	0.10	36.12
07/08/22	Kara B. Hendricks	Review information from K. Anderson regarding additional turnover of assets and funds and follow-up with G. Winkler.	0.20	96.05
07/08/22	Kara B. Hendricks	Respond to C. Ney inquiries regarding pending projects and next steps.	0.40	192.10
07/08/22	Kara B. Hendricks	Follow-up with C. Spaulding regarding response to VanCott fee motion.	0.10	48.02
07/08/22	Kara B. Hendricks	Telephone call to M. Cook.	0.10	48.02
07/08/22	Kara B. Hendricks	Review correspondence and stipulation from K. Dean and follow-up with team regarding referenced acknowledgment.	0.50	240.12
07/08/22	Kara B. Hendricks	Review correspondence from K. Works and follow-up with G. Winkler.	0.10	48.02
07/08/22	Kara B. Hendricks	Respond to email from G. Winkler regarding Razor and asset recover efforts.	0.30	144.07
07/08/22	Kara B. Hendricks	Finalize Notice to Withdraw.	0.20	96.05
07/08/22	Kara B. Hendricks	Review correspondence from D. Huish and follow-up with C. Fronk regarding filing of stipulation re: Tanner funds and finalize same.	0.10	48.02
07/08/22	Kara B. Hendricks	Follow-up on response to accusations regarding ethical obligations.	0.10	48.02
07/08/22	Kara B. Hendricks	Follow-up to confirm parties represented by K. Anderson.	0.10	48.02

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Description of Professional Services Rendered

07/08/22	Jason Hicks	Strategize with receivership team re response to Fabian VanCott email accusing receiver of improper contact.	0.10	36.12
07/08/22	Jason Hicks	Review correspondence and proposed stipulation from Kamille Dean re: her desire to keep funds paid to her by Judd defendants.	0.20	72.25
07/08/22	Jason Hicks	Communications from VanCott re: PAJ and Preston Judd.	0.10	36.12
07/08/22	Cynthia L. Ney	Review recent email communications.	0.20	35.00
07/08/22	Cynthia L. Ney	Meet with K.Hendricks regarding outstanding projects.	0.20	35.00
07/08/22	Christian Spaulding	Emails with K. Hendricks regarding Judd's Motion for Release of Attorneys Fees or Alternatively, leave to withdraw.	0.20	63.75
07/11/22	Kara B. Hendricks	Follow-up with C. Ney regarding document request from Coinbase; Correspond with M. Cianfrani regarding same.	0.30	144.07
07/11/22	Kara B. Hendricks	Follow-up regarding K. Works request for call to discuss fees and return of same.	0.20	96.05
07/11/22	Kara B. Hendricks	Review new information from D. Zaro regarding communication with K. Dean and prepare detailed email clarifying issues regarding return of funds and providing deadlines.	0.50	240.12
07/11/22	Kara B. Hendricks	Review proposed Humphries stipulation and discuss with C. Fronk and follow-up with G. Winkler regarding same.	0.90	432.23
07/11/22	Kara B. Hendricks	Respond to C. Spaulding inquiries regarding response to Judd fee motion.	0.20	96.05
07/11/22	Kara B. Hendricks	Attention to N. Hall declaration sent in support of Humphries request for stipulation regarding expenses.	0.10	48.02
07/11/22	Kara B. Hendricks	Attention to Humphries statement regarding accounting and taxes and related documents.	0.20	96.05
07/11/22	Jason Hicks	Review court's order -ECF No. 147- setting hearings on six pending motions (ECF Nos 89, 108, 114, 119, 120, 142) and strategize with receiver and receivership team regarding same.	0.30	108.37
07/11/22	Jason Hicks	Review draft stipulation regarding living expenses as it concerns Humphries, CJ Investments and Jessica Humphries and strategize with receivership team and receiver regarding same.	0.10	36.12
07/11/22	Jason Hicks	Attention to issues concerning the proposed stipulation to waive 28 USC 2001 as it concerns contemplated sale by receiver of certain property.	0.10	36.12
07/11/22	Jason Hicks	Correspondence from Fabian VanCott - Judd- regarding his new employment and	0.20	72.25

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Description of Professional Services Rendered

		with SEC regarding same, and review supporting docs.		
07/11/22	Jason Hicks	Strategize regarding Kamille Dean (Judd) refusal to turnover all funds.	0.20	72.25
07/11/22	Jason Hicks	Strategize and formulate plan re: Mark Murphy suits/request for him to dismiss those in light of receivership.	0.10	36.12
07/11/22	Cynthia L. Ney	Download, organization and forwarding of documentation forwarded by Coinbase and communications with M.Cianfrani.	0.40	70.00
07/11/22	Cynthia L. Ney	Review recent email communications.	0.20	35.00
07/11/22	Cynthia L. Ney	Communications with K.Hendricks regarding same.	0.10	17.50
07/11/22	Christian Spaulding	Evaluate Judd's Motion to Release Attorneys' Fees or Alternatively, Motion for Leave to Withdraw, including evaluation of cases and documents relied upon therein.	4.20	1,338.75
07/11/22	Christian Spaulding	Outline arguments and begin draft of Opposition to Judd's Motion to Release Attorneys' Fees.	2.30	733.13
07/12/22	Kara B. Hendricks	Review information from K. Works on Humphries assets and proposal and discuss same in advance of call with K. Works; Conference call with K. Works, P. Johnston and P. Christiansen regarding asset turnover and fee requests.	1.10	528.27
07/12/22	Kara B. Hendricks	Review draft motion regarding procedure for sale of real property and follow-up with D. Edington regarding proposed deeds and Nevada requirements associated with sale of real property; Update G. Winkler and AM team.	0.30	144.07
07/12/22	Kara B. Hendricks	Correspond with G. Winkler regarding Humphries request to retain certain assets.	0.10	48.02
07/12/22	Kara B. Hendricks	Review order regarding turnover of Tanner funds and correspond with D. Huish to facilitate the same.	0.20	96.05
07/12/22	Kara B. Hendricks	Update counsel for the SEC regarding discussions with firm representing Humphries, asset turnover, requested fees and stipulation.	0.20	96.05
07/12/22	Kara B. Hendricks	Follow-up with G. Ogata office on vehicle sales information and information needed to account for assets; Update G. Winkler.	0.20	96.05
07/12/22	Christian Spaulding	Follow up with team regarding requirements to substitute as local counsel.	0.30	95.63
07/12/22	Christian Spaulding	Evaluate prior motions filed by Judd and status thereof.	0.40	127.50
07/12/22	Christian Spaulding	Continue evaluation of relevant documents, evidence and authority and draft of Opposition to Judd Motion to Release Fees.	5.80	1,848.75
07/13/22	Kara B. Hendricks	Correspond with K. Dean on monies	0.20	96.05

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		withheld and expected motion to retain funds.		
07/13/22	Kara B. Hendricks	Correspond with SEC regarding TRO questions needed to assess claims associated with assets.	0.10	48.02
07/13/22	Kara B. Hendricks	Review correspondence from E. Stepp regarding Oberheiden motion regarding retention of fees and follow-up with C. Spaulding regarding response to same.	0.10	48.02
07/13/22	Kara B. Hendricks	Attention to documents purporting for basis for not turning over Razor held by Taylor Richards and follow up with G. Winkler regarding same.	0.20	96.05
07/13/22	Kara B. Hendricks	Update G. Winkler on efforts to have funds turned over by counsel and anticipated motions relating to the same.	0.10	48.02
07/13/22	Kara B. Hendricks	Respond to email from L Maningo regarding turnover of assets by L. Maningo on behalf of Seybert and Rockinghorse.	0.10	48.02
07/13/22	Christian Spaulding	Confer with K. Hendricks regarding Oberheiden Motion to Retain Fees.	0.20	63.75
07/13/22	Christian Spaulding	Confer with team regarding Temporary Restraining Order filed under seal.	0.30	95.63
07/13/22	Christian Spaulding	Continue draft of Opposition to Motion to Release Fees and research case law in support of Receiver's opposition thereto.	4.80	1,530.00
07/13/22	Christian Spaulding	Evaluate Oberheiden Motion to retain fees and related documents.	1.50	478.13
07/14/22	Kara B. Hendricks	Telephone call from counsel regarding potential sale of receivership assets regarding Eco Battery; Prepare update for G. Winkler.	0.40	192.10
07/14/22	Cynthia L. Ney	Review various email communications and notes and update receiver task list for weekly call; review materials and update various charts; communications with K.Hendricks regarding same.	2.30	402.50
07/14/22	Christian Spaulding	Continue evaluation of relevant case law and draft of Opposition to Judd's Motion to Release Attorneys' Fees or Alternatively leave for Motion to Withdraw.	8.90	2,836.88
07/14/22	Christian Spaulding	Review docket and recent filings.	0.30	95.63
07/15/22	Kara B. Hendricks	Attention to correspondence from P. Johnston regarding Humphries assets and turnover and proposed stipulation and forward to G. Winkler for discussion; Request C. Ney's assistance with further researching new house identified.	0.30	144.07
07/15/22	Kara B. Hendricks	Attention to task list and attend coordination meeting to discuss project status, asset recovery efforts, next steps and division of work.	0.90	432.23
07/15/22	Kara B. Hendricks	Follow-up with Drasovich and G. Ogata to	0.20	96.05

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		get information regarding cars purportedly sold by Beasley after FBI raid.		
07/15/22	Kara B. Hendricks	Review information regarding Hurricane, UT property owned by Humphries and share same with receivership team.	0.20	96.05
07/15/22	Kara B. Hendricks	Provide information to SEC regarding upcoming filings and necessary back-up documentation.	0.10	48.02
07/15/22	Kara B. Hendricks	Respond to email from M. Cavenuagh regarding Eco Bat and potential assets for receiver.	0.10	48.02
07/15/22	Kara B. Hendricks	Follow-up with team regarding status of pending projects including response to motions to retain funds/assets.	0.30	144.07
07/15/22	Kara B. Hendricks	Correspond with J. McGraw and C. Ney regarding real property research and documents obtained as part of same.	0.10	48.02
07/15/22	Jason Hicks	Review Christopher Humphries statement re: accounting and taxes filed in court -ECF No. 148.	0.10	36.12
07/15/22	Jason Hicks	Strategy call with receivership team and the receiver to discuss status of collection and liquidation efforts, follow up efforts, personal property motion, title turnover, and other case and collection/preservation issues.	1.00	361.25
07/15/22	Jason Hicks	Review Jeff Judd's opposition to SEC's motion to amend receivership and add new defendants (ECF No 162).	0.30	108.37
07/15/22	Jason Hicks	Review Richard Madsen's response in opposition to the SEC's motions to amend the preliminary injunction and receivership order (ECF No 161).	0.20	72.25
07/15/22	Jason Hicks	Communications from receiver and with receivership team regarding Judd/Taylor Richards Razor UTV issue/turnover and accompanying documents.	0.20	72.25
07/15/22	Jason Hicks	Review Christopher Madsen's response to SEC's motions to amend the preliminary injunction and receivership order (ECF No 159).	0.20	72.25
07/15/22	Jason Hicks	Review Oberheiden P.C. motion to retain funds (Judd) for purposes of opposing same.	0.10	36.12
07/15/22	Jason Hicks	Review courts minute order and amended notice regarding July 25 upcoming hearing (ECF No 155) concerning numerous pending motions/the bankruptcy report.	0.10	36.12
07/15/22	Jason Hicks	Review correspondence with Ogata firm regarding the sale of a Ferrari and G-Wagon.	0.10	36.12
07/15/22	Jason Hicks	Review correspondence from M Cook regarding potential dismissal of Murphy	0.10	36.12

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Description of Professional Services Rendered

		action.		
07/15/22	Cynthia L. Ney	Participate in team call to to avoid duplicate efforts and update task list.	1.00	175.00
07/15/22	Cynthia L. Ney	Review file and forward materials to K.Hendricks for review.	0.30	52.50
07/15/22	Cynthia L. Ney	Forward materials to J.McGraw for review.	0.10	17.50
07/15/22	Cynthia L. Ney	Communications with K.Hendricks.	0.10	17.50
07/15/22	Cynthia L. Ney	Research regarding Humphries Utah property.	0.40	70.00
07/15/22	Cynthia L. Ney	Review communications and update receiver task list.	0.60	105.00
07/15/22	Christian Spaulding	Finalize draft of Opposition to Judd's Motion to Release Funds and email to K. Hendricks regarding the same.	3.10	988.13
07/18/22	Kara B. Hendricks	Correspond with K. Dean regarding additional time to file motion regarding retaining fees.	0.10	48.02
07/18/22	Kara B. Hendricks	Review emails from G. Winkler regarding ceased assets.	0.10	48.02
07/18/22	Kara B. Hendricks	Telephone call to D. Scheiss to discuss recovery of title for vehicles and assets recovered by the FBI.	0.40	192.10
07/18/22	Kara B. Hendricks	Revise response to Judd motion for fees and discuss further revisions with C. Spaulding; Send update draft to G. Winkler for review and comment.	3.50	1,680.87
07/18/22	Kara B. Hendricks	Attention to correspondence from M. Cook regarding Murphy background and proposal regarding certain assets and information.	0.20	96.05
07/18/22	Kara B. Hendricks	Telephone call with G. Winkler regarding new asset information and follow-up with Allen Matkins team.	0.30	144.07
07/18/22	Jason Hicks	Review letter from Marc Cook on behalf of Murphy setting forth his position as to why Murphy should not be a defendant or otherwise why certain funds should be released, and accompanying supporting documents.	0.40	144.50
07/18/22	Jason Hicks	Review communications regarding potential turnover by FBI, through USAO, of certain vehicles and coins and strategize re: same.	0.10	36.12
07/18/22	Cynthia L. Ney	Review documentation and compile listings of FBI seizures.	0.40	70.00
07/18/22	Christian Spaulding	Revise draft of Response to Judd Motion to Release Funds per edits by K. Hendricks.	1.90	605.63
07/18/22	Christian Spaulding	Draft declaration of K. Hendricks in support of Response to Judd's Motion to Release Funds.	0.60	191.19
07/18/22	Christian Spaulding	Evaluate docket for all motions for which response is needed.	0.30	95.63
07/19/22	Kara B. Hendricks	Telephone call from M. Cook regarding	0.10	48.02

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Description of Professional Services Rendered

07/19/22	Kara B. Hendricks	Murphy assistance in identifying assets. Attention to motions scheduled for hearing and follow-up with J. Hicks regarding same.	0.20	96.05
07/19/22	Kara B. Hendricks	Correspond with P. Johnston regarding Humphries stipulation.	0.10	48.02
07/19/22	Kara B. Hendricks	Review new information from K. Dean regarding motion to retain fees and update G. Winkler.	0.10	48.02
07/19/22	Kara B. Hendricks	Correspond with A. Grisby regarding list of seized assets.	0.10	48.02
07/19/22	Kara B. Hendricks	Attention to email from D. Zaro regarding frozen Judd accounts and funds transferred in March.	0.20	96.05
07/19/22	Kara B. Hendricks	Attention to fee request and information provided by K. Works regarding Humphries funds and follow-up with G. Winkler regarding same.	0.20	96.05
07/19/22	Kara B. Hendricks	Follow-up with C. Spaulding regarding response to Oberheiden fee motion.	0.10	48.02
07/19/22	Kara B. Hendricks	Attention to emails from L. Maningo regarding W. Rosegreen and Triple Threat Basketball assets and proposal.	0.20	96.05
07/19/22	Kara B. Hendricks	Follow-up with SEC and G. Winkler regarding the same.	0.20	96.05
07/19/22	Kara B. Hendricks	Attention to draft stipulation regarding asset turnover and living expenses and outline issues for further discussion with G. Winkler and SEC.	0.60	288.15
07/19/22	Jason Hicks	Review the Official Committee of Unsecured Creditors' response to our (Receiver's) status report and recommendations to the district court concerning what to do with the various bankruptcy cases (ECF No 175) and discussions re: response strategy to same with receivership team.	0.30	108.37
07/19/22	Jason Hicks	Review communications from Kamille Dean (Judd) regarding her desire to retain over \$200k in funds, and issues concerning her anticipated filing of a motion with the court requesting the same.	0.10	36.12
07/19/22	Jason Hicks	Discuss next week's hearing on multiple pending motions with receivership team and strategize regarding same as I will be appearing on behalf of our side.	0.20	72.25
07/19/22	Cynthia L. Ney	Review recent email communications and update Receiver's task list with projects to be completed.	2.00	350.00
07/19/22	Christian Spaulding	Draft Motion to Employ Accounting firm and accompanying declaration in support.	3.20	1,020.00
07/20/22	Kara B. Hendricks	Attention to response to motion to amend/correct filed by the SEC and	0.30	144.07

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Description of Professional Services Rendered

		information referenced regarding assets held by new parties in anticipation of additional action required by receivers.		
07/20/22	Kara B. Hendricks	Incorporate comments and finalize response in opposition to Judd motion for fees.	1.80	864.45
07/20/22	Kara B. Hendricks	Review information provided by A. Grigby regarding Ruffian Road residence and payment issues.	0.10	48.02
07/20/22	Kara B. Hendricks	Call with L Maningo and G. Winkler regarding W. Rosegreen and Triple Threat Basketball assets and transfer of available funds.	0.30	144.07
07/20/22	Kara B. Hendricks	Correspond with K. Dean regarding motion to retain funds.	0.10	48.02
07/20/22	Kara B. Hendricks	Attention to information from A. Grigsby regarding assets seized from Beasley.	0.10	48.02
07/20/22	Kara B. Hendricks	Confer with G. Winkler regarding various issues including Humphries stipulation and fee concerns, motions, and expected agreed upon transfers.	0.60	288.15
07/20/22	Kara B. Hendricks	Attention to response filed by the SEC relating to request by Judd's counsel to retain fees.	0.20	96.05
07/20/22	Kara B. Hendricks	Attention to offer regarding Abbey Hill property and follow-up with G. Winkler regarding potential approval of same and K. Anderson regarding willingness of P. Judd to stipulate to sale if amount approved.	0.30	144.07
07/20/22	Kara B. Hendricks	Evaluate potential for motion relating to assets seized by the FBI.	0.30	144.07
07/20/22	Kara B. Hendricks	Discuss funds held by the Christiansen firm with G. Winkler; Correspond to K. Works regarding funds retained, provide wire instructions and deadline for fee motion.	0.50	240.12
07/20/22	Jason Hicks	Review the SEC's response to Judd's motion for release of funds for attorney's fees (ECF No 180).	0.20	72.25
07/20/22	Jason Hicks	Communications from Fabian VanCott (Judd) regarding potential sale of property.	0.10	36.12
07/20/22	Jason Hicks	Review the SEC's reply in support of its motion to amend the injunction and asset freeze order (ECF No 181) and exhibits.	0.40	144.50
07/20/22	Jason Hicks	Strategize with receivership team and formulate plan regarding obtaining and preserving for later distribution per claims process certain assets, such as gold bars, jewelry and cash.	0.10	36.12
07/20/22	Jason Hicks	Review/revise opposition to Judd's motion for release of funds and strategize with receiver and receivership team re: same.	0.70	252.87
07/20/22	Cynthia L. Ney	Review recent court filings and email	0.60	105.00

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		communications.		
07/20/22	Cynthia L. Ney	Update charts.	0.50	87.50
07/20/22	Cynthia L. Ney	Compilation of materials for team's review.	0.40	70.00
07/20/22	Cynthia L. Ney	Communications with K.Hendricks regarding tasks.	0.20	35.00
07/21/22	Kyle Ewing	Conference with K. Hendricks re: tomorrow's meeting with AFS and Allen Matkins in preparation for Monday's hearing before the Court on various motions.	0.20	68.00
07/21/22	Kara B. Hendricks	Review new information regarding seized Beasley assets.	0.10	48.02
07/21/22	Kara B. Hendricks	Follow-up with G. Ogata regarding sale of Beasley vehicles.	0.10	48.02
07/21/22	Kara B. Hendricks	Attention to articles regarding claims made against Wells Fargo regarding Beasley Iota account.	0.10	48.02
07/21/22	Kara B. Hendricks	Attention to Judd filings regarding assets and information provided regarding FBI seizure to assess information needed from US Attorneys and potential assets to recover for estate.	0.30	144.07
07/21/22	Kara B. Hendricks	Attention to memo and information regarding ECOBAT and interest in purchasing receivers interest in same.	0.30	144.07
07/21/22	Kara B. Hendricks	Follow-up regarding pending projects including contact with counsel and return of assets for a number of defendants and relief defendants.	0.50	240.12
07/21/22	Kara B. Hendricks	Correspond with C. Ney regarding task list and pending projects.	0.20	96.05
07/21/22	Kara B. Hendricks	Correspond with D. Billings regarding sale of property held by Preston Judd and update G. Winkler.	0.30	144.07
07/21/22	Kara B. Hendricks	Follow-up with T. Combs and C. Fron and provide updated information.	0.20	96.05
07/21/22	Kara B. Hendricks	Attention to email from P. Johnston with new information regarding house in Hurricane. The Humphries want the rental income for and follow-up with G. Winkler regarding same.	0.20	96.05
07/21/22	Kara B. Hendricks	Telephone call to A. Grigsby regarding Paula Beasley default notice and research issues relating to Ruffian house and payments.	0.30	144.07
07/21/22	Jason Hicks	Review correspondence from Fabian VanCott regarding turnover/liquidation of Preston Judd home/proposed purchase and stipulated sales process.	0.10	36.12
07/21/22	Jason Hicks	Review draft of opposition to Oberheiden (Judd) motion to retain earned fees and expenses.	0.30	108.37
07/21/22	Cynthia L. Ney	Review email communications and update	0.80	140.00

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		receiver task list and forward same to team for call.		
07/21/22	Cynthia L. Ney	Comparison of seizure lists and communications with K.Hendricks.	0.30	52.50
07/21/22	Cynthia L. Ney	Review file and compilation of materials regarding real property and forward to K.Hendricks.	0.40	70.00
07/21/22	Christian Spaulding	Continue draft of Opposition to Oberheiden's request to retain earned fees and expenses.	2.70	860.63
07/22/22	Kara B. Hendricks	Prepare detailed email to P. Johnston regarding Humphries stipulation and issues to be further addressed based on discussion with G. Winkler and SEC.	1.00	480.25
07/22/22	Kara B. Hendricks	Get input from M. Ferrario regarding counsel for potential third party claims.	0.20	96.05
07/22/22	Kara B. Hendricks	Participate in strategy meeting to discuss upcoming hearing, status of assets recovery efforts, potential litigation and the like.	1.10	528.27
07/22/22	Kara B. Hendricks	Work with J. Hicks on outline and issues for discussion at upcoming hearing including scope of order and ability to get assets from relief defendants and others and provide additional background based on discussions with SEC.	0.50	240.12
07/22/22	Kara B. Hendricks	Call with SEC counsel and G. Winkler regarding requests from Humphries and Jager and upcoming hearing.	0.80	384.20
07/22/22	Kara B. Hendricks	Work with C. Ney identify parties and that have complied with receivership order reporting requirements and send information to G. Winkler for reference at upcoming hearing.	0.90	432.23
07/22/22	Kara B. Hendricks	Attention to emails from L. Maningo and follow-up with Allen Matkins team for assistance in having funds transferred to receiver from accounts frozen by Wells Fargo.	0.20	96.05
07/22/22	Kara B. Hendricks	Follow-up with K. Dean regarding motion to retain fees.	0.10	48.02
07/22/22	Kara B. Hendricks	Attention to emails from M. Cook regarding Murphy cooperation.	0.10	48.02
07/22/22	Kara B. Hendricks	Begin preparation of motion for turnover of property held by the FBI, DOJ and US Attorneys and request C. Spaulding conduct further research and work on same.	1.70	816.43
07/22/22	Jason Hicks	Begin preparing for Monday's hearing on multiple motions.	0.50	180.62
07/22/22	Jason Hicks	Review reply/response of Receiver to Creditor Committee's response to Receiver's report and recommendation concerning the BK cases (ECF No 184).	0.30	108.37
07/22/22	Jason Hicks	Strategy call with Receiver and	0.80	289.00

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		receivership team to discuss and formulate plans regarding next Monday's hearing on multiple motions, status of various asset identification, collection, and liquidation efforts.		
07/22/22	Cynthia L. Ney	Participate in weekly team call.	0.80	140.00
07/22/22	Cynthia L. Ney	Review and correct docketing issues.	0.30	52.50
07/22/22	Cynthia L. Ney	Communications with K.Hendricks.	0.20	35.00
07/22/22	Cynthia L. Ney	Review pleadings and preparation of chart outlying defendants and financial institutions compliance with receivership order.	2.20	385.00
07/24/22	Jason Hicks	Prepare for tomorrow's hearing on multiple motions (including reviewing the briefing and making an outline of points).	1.90	686.37
07/25/22	Jason Hicks	Further review of briefing for purposes of today's hearing; attend omnibus hearing and debrief with receiver and receivership team/formulate plan regarding next steps.	2.90	1,047.79
07/25/22	Cynthia L. Ney	Compile and forward materials to C.Spaulding for motion preparation.	0.20	35.00
07/25/22	Christian Spaulding	Finalize draft of Motion to Employ Tax Professionals and coordinate filing of the same.	0.50	159.38
07/25/22	Christian Spaulding	Confer with team regarding declaration in support of Motion to Employ Tax Professionals.	0.20	63.75
07/25/22	Christian Spaulding	Work with E. Escobar-Gaddi to finalize and file Motion to Employ Tax Professional.	0.30	95.63
07/27/22	Kara B. Hendricks	Request C. Ney's assistance with cross referencing information provided by G. Winkler regarding investors with GT records.	0.30	144.07
07/27/22	Kara B. Hendricks	Provide M. Cook requested information regarding Receivership website and return call to discuss document turnover and related issues; Update G. Winkler regarding same.	0.60	288.15
07/27/22	Kara B. Hendricks	Review research regarding self-incrimination and extent of 5th amendment protection.	0.50	240.12
07/27/22	Kara B. Hendricks	Return call to A. Grisby regarding assets held by Paula Beasley.	0.10	48.02
07/27/22	Kara B. Hendricks	Attention to parties that have not complied with document and reporting demands and correspond with team regarding mechanism to compel compliance.	0.40	192.10
07/27/22	Kara B. Hendricks	Attention to emails regarding Rosegreen/ Triple Threat transfer of funds.	0.10	48.02
07/27/22	Kara B. Hendricks	Correspond with A. Grigsby regarding P. Beasley and questions regarding assets.	0.20	96.05
07/27/22	Kara B. Hendricks	Follow-up regarding Response to	0.70	336.17

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		Oberheiden motion to retain funds and finalize same.		
07/27/22	Kara B. Hendricks	Further correspondence with K. Dean on motion for fees; Follow-up with G. Winkler and Request C. Spaulding work on motion to compel re: Dean noncompliance.	0.50	240.12
07/27/22	Kara B. Hendricks	Attention to and follow-up regarding attorneys holding funds including review of information regarding Christiansen firm transfer and follow-up with K. Dean.	0.30	144.07
07/27/22	Jason Hicks	Strategize with receiver and receivership re asset identification and collection issues, e.g., investor to investor transfers and lists from defendants, issues with the 5th amendment assertion by Judd to avoid producing documents and Kamille Dean's continued refusal to turnover.	0.50	180.62
07/27/22	Jason Hicks	Review/revise draft of response to Oberheiden firm's motion to retain funds for defense costs.	0.30	108.37
07/27/22	Cynthia L. Ney	Review pleadings and email communications regarding receipt of investor lists and those still needed (.5)	0.50	87.50
07/27/22	Cynthia L. Ney	Communications with K.Hendricks regarding same.	0.10	17.50
07/27/22	Cynthia L. Ney	Review recent email communications and court filings.	0.30	52.50
07/27/22	Christian Spaulding	Evaluate itemized lists of assets seized by FBI from Judd and Beasley. Evaluate authority and case law regarding potential to seek turnover of the same.	3.80	1,211.25
07/27/22	Christian Spaulding	Draft proposed order granting Motion for Order Authorizing Receiver to Employ Tax Professionals.	0.40	127.50
07/28/22	Kara B. Hendricks	Update information in cooperation list regarding assets and party cooperation.	0.30	144.07
07/28/22	Kara B. Hendricks	Follow-up with C. Ney regarding pending projects and prioritizing same.	0.40	192.10
07/28/22	Kara B. Hendricks	Confer with G. Winkler and J. Hall regarding missing records, motions to compel, turnover of assets and related issues.	0.70	336.17
07/28/22	Kara B. Hendricks	Attention to emails regarding information needed to sale aircraft.	0.10	48.02
07/28/22	Kara B. Hendricks	Correspond with K. Works regarding funds sent to receiver and fee motion.	0.10	48.02
07/28/22	Kara B. Hendricks	Review correspondence regarding K. Dean and prepare motion to compel.	1.10	528.27
07/28/22	Kara B. Hendricks	Review emails and follow-up regarding stipulation for transfer of funds relating to Triple Threat Basketball.	0.20	96.05
07/28/22	Kara B. Hendricks	Follow-up with C. Spaulding regarding turnover motion, provide additional	0.20	96.05

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		information and assist with outline for same.		
07/28/22	Kara B. Hendricks	Work with GT team to facilitate investor outreach meeting and follow-up with G. Winkler regarding same; Correspond with A. Deering regarding notice to investors and revise same.	0.80	384.20
07/28/22	Cynthia L. Ney	Review materials and update receiver task list, forward same to K.Hendricks; forward task list to team for call.	0.40	70.00
07/28/22	Christian Spaulding	Continue evaluation of authority for turnover of assets seized by FBI and confer with K. Hendricks regarding the same.	2.30	733.13
07/28/22	Christian Spaulding	Begin draft of Motion for Turnover of Assets Seized by FBI.	3.20	1,020.00
07/29/22	Kara B. Hendricks	Participate in meeting to review task list, assets recovery efforts, next steps and discuss division of work.	1.10	528.27
07/29/22	Kara B. Hendricks	Return call to N. Savino regarding subpoena response and follow-up with G. Winkler.	0.10	48.02
07/29/22	Kara B. Hendricks	Prepare motion to compel K. Dean turnover of funds including incorporate information from D. Zaro regarding communication with Ms. Dean; Prepare declarations of Zaro and Hendricks in support of same.	3.40	1,632.85
07/29/22	Kara B. Hendricks	Attention to email from D. Billings regarding sale of PAJ property including follow-up with G. Winkler and requesting buyer contact information.	0.10	48.02
07/29/22	Kara B. Hendricks	Call with Coinbase to discuss anticipated filing and timing related to turnover of funds.	0.30	144.07
07/29/22	Cynthia L. Ney	Participate in weekly team meeting.	1.00	175.00
07/29/22	Cynthia L. Ney	Review recent court orders.	0.20	35.00
07/29/22	Christian Spaulding	Continue draft of Motion for Turnover of assets seized by FBI.	1.40	446.25
07/30/22	Kara B. Hendricks	Request C. Spaulding assistance with response to Humphries counsel's request to retaining funds.	0.10	48.02
07/30/22	Kara B. Hendricks	Attention to quarterly report and provide comments and additional information to same.	3.10	1,488.78
07/31/22	Jason Hicks	Strategize with receivership team regarding Kamille Dean (Judd attorney) who is refusing to turn over all funds, and necessity for motion practice with court.	0.10	36.12
07/31/22	Jason Hicks	Review communications to/from Humphries counsel regarding various assets (cars, Huntington and Henderson homes, etc) and turnover agreements and from Fabian VanCott regarding property	0.20	72.25

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07/31/22	Jason Hicks	sale. Review draft of Receiver's report to the court.	0.50	180.62
07/31/22	Jason Hicks	Review correspondence from bank counsel / strategize with receiver and receivership team regarding stipulated turnover orders.	0.10	36.12
			Total Hours:	145.40
			Total Amount:	\$ 53,359.89

TIMEKEEPER SUMMARY FOR TASK CODE GW001,

ASSET ANALYSIS AND RECOVERY

Summary of Fees (Standard Rates)

<u>Timekeeper Name</u>	<u>Hours Billed</u>	<u>Standard Rate</u>	<u>Total \$ Amount</u>
Mark E. Ferrario	0.30	725.00	217.50
Kara B. Hendricks	55.30	565.00	31,244.50
Jason Hicks	17.20	425.00	7,310.00
Kyle Ewing	0.40	400.00	160.00
Christian Spaulding	53.10	375.00	19,912.50
Cynthia L. Ney	19.10	295.00	5,634.50
Totals:	145.40	443.46	\$ 64,479.00

Summary of Fees (Discounted Rates)

<u>Timekeeper Name</u>	<u>Hours Billed</u>	<u>Average Discounted Rate</u>	<u>Total \$ Amount</u>
Mark E. Ferrario	0.30	616.27	184.88
Kara B. Hendricks	55.30	480.24	26,557.41
Jason Hicks	17.20	361.25	6,213.47
Kyle Ewing	0.40	340.00	136.00
Christian Spaulding	53.10	318.75	16,925.63
Cynthia L. Ney	19.10	175.00	3,342.50
Totals:	145.40	366.99	\$ 53,359.89

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Description of Professional Services Rendered

TASK CODE: GW002 ASSET DISPOSITION

<u>DATE</u>	<u>TIMEKEEPER</u>	<u>DESCRIPTION</u>	<u>HOURS</u>	<u>AMOUNT</u>
07/11/22	David Edington	Review forms of deeds and provide comments to same.	0.50	259.25
			Total Hours:	0.50
			Total Amount:	\$ 259.25

TIMEKEEPER SUMMARY FOR TASK CODE GW002,

ASSET DISPOSITION

Summary of Fees (Standard Rates)

<u>Timekeeper Name</u>	<u>Hours Billed</u>	<u>Standard Rate</u>	<u>Total \$ Amount</u>
David Edington	0.50	610.00	305.00
Totals:	0.50	610.00	\$ 305.00

Summary of Fees (Discounted Rates)

<u>Timekeeper Name</u>	<u>Hours Billed</u>	<u>Average Discounted Rate</u>	<u>Total \$ Amount</u>
David Edington	0.50	518.50	259.25
Totals:	0.50	518.50	\$ 259.25

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TASK CODE: GW004 CASE ADMINISTRATION

<u>DATE</u>	<u>TIMEKEEPER</u>	<u>DESCRIPTION</u>	<u>HOURS</u>	<u>AMOUNT</u>
07/01/22	Kara B. Hendricks	Review correspondence from K. Works regarding tax protection.	0.10	48.02
07/01/22	Jason Hicks	Review correspondence from Fabian Van Cott re motion to compel and stip, and holding of funds, and call concerning same.	0.20	72.25
07/02/22	Jason Hicks	Review communications from Marc Cook re meeting with Receiver.	0.10	36.12
07/02/22	Jason Hicks	Review receiver report and recommendation re Chapter 11 BK cases.	0.20	72.25
07/02/22	Jason Hicks	Review redline compare of original vs. first amended complaint by SEC and communications with Receiver re: same.	0.10	36.12
07/02/22	Jason Hicks	Review FBI search warrant docs, including inventory - receipt for property- list, related to Judd provided by Fabian VanCott firm and communications thereto.	0.30	108.37
07/05/22	Kara B. Hendricks	Review order on stipulation re: Judd Motion to Compel.	0.10	48.02
07/05/22	Kara B. Hendricks	Correspond with J. Del Castro regarding title company contacts.	0.10	48.02
07/05/22	Kara B. Hendricks	Prepare draft stipulation for release of Tanner funds and follow-up with C. Fronk.	0.80	384.20
07/05/22	Kara B. Hendricks	Participate in call with G. Winkler and team regarding case priorities and next steps.	0.80	384.20
07/05/22	Kara B. Hendricks	Review petition authorizing sale of personal property and provide comments to team.	0.30	144.07
07/05/22	Kara B. Hendricks	Send investor update to G. Winkler.	0.10	48.02
07/05/22	Kara B. Hendricks	Telephone call with investor J. Butler.	0.30	144.07
07/05/22	Kara B. Hendricks	Prepare notice of withdrawal of Judd Motion and coordinate filing with A. Rosehill.	0.40	192.61
07/05/22	Kara B. Hendricks	Review communication from K. Anderson and correspond with SEC counsel regarding same.	0.20	96.05
07/05/22	Jason Hicks	Review correspondence from Fabian Vancott firm -Judd- regarding Judd's motion to clarify, request for release of funds for fees, leave to withdraw (.1)	0.10	36.12
07/05/22	Jason Hicks	Strategy call with receiver and receivership team to discuss status and next action items re: collection of assets and potential motion work necessary.	0.80	289.00
07/05/22	Jason Hicks	Review order on ECF 135.	0.10	36.12
07/07/22	Cynthia L. Ney	Preparation of Notice of Withdrawal of Motion for Order to Show Cause why	0.30	52.50

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Description of Professional Services Rendered

		Garrett Ogata Should Not be Held in Contempt and communications with K. Hendricks regarding same.		
07/08/22	Jason Hicks	Review briefing on Mark Murphy suit against certain defendants and correspondence re: potential stay or dismissal of same.	0.30	108.37
07/11/22	Kara B. Hendricks	Correspond with team regarding Murphy lawsuit and request for dismissal.	0.10	48.02
07/11/22	Kara B. Hendricks	Request C. Ney assistance with shell for new motion.	0.20	96.05
07/11/22	Kara B. Hendricks	Review email from K. Anderson regarding Judd employment and follow-up with G. Winkler.	0.10	48.02
07/11/22	Kara B. Hendricks	Review minute order resetting hearing on pending motions and cross reference matters on court docket.	0.20	96.05
07/11/22	Kara B. Hendricks	Correspond with M. Pham regarding adversary proceeding and procedure for dismissal.	0.10	48.02
07/11/22	Kara B. Hendricks	Email K. Anderson regarding withdrawal of first motion regarding receivership order and fees (doc 114).	0.10	48.02
07/11/22	Kara B. Hendricks	Telephone call with M. Cook and follow-up with AM team regarding bankruptcy overlay.	0.30	144.07
07/12/22	Kara B. Hendricks	Prepare litigation summary for use in court filings and follow-up with A. Deering regarding same.	0.80	384.20
07/12/22	Kara B. Hendricks	Review bankruptcy recommendations in order to respond to M. Cook inquiries regarding dismissal of Murphy claims and procedural issues associated with same; Attention to emails from M. Cook regarding same and follow-up with G. Winkler.	0.50	240.12
07/12/22	Kara B. Hendricks	Communicate with J. delCastillo regarding coordination and division of work.	0.20	96.05
07/12/22	Kara B. Hendricks	Prepare summary of information need for upcoming status report and fee applications.	0.40	192.10
07/12/22	Kara B. Hendricks	Review notice filed by K. Anderson regarding Judd Motion to address fees and receivership order.	0.10	48.02
07/13/22	Kara B. Hendricks	Correspond with A. Deering regarding requested court filings.	0.10	48.02
07/13/22	Kara B. Hendricks	Confer with J. delCastillo regarding preparation of quarterly reports and division of work to avoid duplicative efforts.	0.20	96.05
07/15/22	Kara B. Hendricks	Work with C. Ney to prioritize projects and deadlines.	0.20	96.05
07/15/22	Kara B. Hendricks	Correspond with J. Hall regarding receiver	0.90	432.23

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		services and statements.		
07/19/22	Kara B. Hendricks	Attention to response filed by creditors committee to bankruptcy recommendations and follow-up with Allen Matkins teams to coordinate next steps.	0.40	192.10
07/19/22	Kara B. Hendricks	Respond to C. Spaulding inquiries regarding motion to employ accounting firm and preparation of motion and supporting declaration.	0.20	96.05
07/19/22	Kara B. Hendricks	Attention to correspondence regarding engagement of tax advisor and request C. Spaulding's assistance in preparing same.	0.20	96.05
07/20/22	Kara B. Hendricks	Revise motion to employ tax professional and supporting declaration and correspond with S. Chiang regarding review.	1.60	768.40
07/21/22	Kara B. Hendricks	Review receivership order and request C. Ney review docket for compliance with paragraphs 9, 10,11 and 17.	0.30	144.07
07/21/22	Kara B. Hendricks	Attention to reply in support of bankruptcy recommendation to assist with hearing preparation.	0.20	96.05
07/21/22	Kara B. Hendricks	Follow-up with C. Spaulding regarding Oberheiden response to motion to retain funds and review and revise same and circulate to client for comment.	1.60	768.40
07/22/22	Kara B. Hendricks	Correspond with S. Chiang regarding declaration and motion to employ Baker Tilly and review and revisions to declaration.	0.20	96.05
07/27/22	Kara B. Hendricks	Follow-up with S. Chiang regarding filing of motion to employ tax professionals.	0.10	48.02
07/29/22	Kara B. Hendricks	Telephone call with investor G. Shirey regarding case status and investor meeting.	0.10	48.02
07/29/22	Kara B. Hendricks	Attention to emails regarding Baker Tilley rates and correspond with G. Winkler regarding same.	0.20	96.05
07/29/22	Kara B. Hendricks	Begin review and revisions to status report.	0.70	336.17
07/30/22	Kara B. Hendricks	Correspond with L. Maningo regarding Rosegreen transfer of funds and new information from Wells Fargo.	0.10	48.02

Total Hours: 16.10

Total Amount: \$ 7,379.04

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Description of Professional Services RenderedTIMEKEEPER SUMMARY FOR TASK CODE GW004,

CASE ADMINISTRATION

Summary of Fees (Standard Rates)

<u>Timekeeper Name</u>	<u>Hours Billed</u>	<u>Standard Rate</u>	<u>Total \$ Amount</u>
Kara B. Hendricks	13.60	565.00	7,684.00
Jason Hicks	2.20	425.00	935.00
Cynthia L. Ney	0.30	295.00	88.50
Totals:	16.10	540.84	\$ 8,707.50

Summary of Fees (Discounted Rates)

<u>Timekeeper Name</u>	<u>Hours Billed</u>	<u>Average Discounted Rate</u>	<u>Total \$ Amount</u>
Kara B. Hendricks	13.60	480.28	6,531.82
Jason Hicks	2.20	361.24	794.72
Cynthia L. Ney	0.30	175.00	52.50
Totals:	16.10	458.33	\$ 7,379.04

Invoice No.: 1000096060
Matter No.: 209375.010100

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Description of Professional Services Rendered

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Description of Professional Services Rendered**TIMEKEEPER ACTIVITY GRAND TOTAL SUMMARY****Summary of Fees (Standard Rates)**

<u>Timekeeper</u>	<u>Hours</u>	<u>Rate</u>	<u>Amount</u>
David Edington	0.50	610.00	305.00
Mark E. Ferrario	0.30	725.00	217.50
Kara B. Hendricks	68.90	565.00	38,928.50
Jason Hicks	19.40	425.00	8,245.00
Kyle Ewing	0.40	400.00	160.00
Christian Spaulding	53.10	375.00	19,912.50
Cynthia L. Ney	19.40	295.00	5,723.00
	<hr/>	<hr/>	<hr/>
Totals:	162.00	5,105.53	\$ 82,199.00

Summary of Fees (Discounted Rates)

<u>Timekeeper</u>	<u>Hours</u>	<u>Rate</u>	<u>Amount</u>
David Edington	0.50	518.50	259.25
Mark E. Ferrario	0.30	616.27	184.88
Kara B. Hendricks	68.90	480.25	33,089.23
Jason Hicks	19.40	361.25	7,008.19
Kyle Ewing	0.40	340.00	136.00
Christian Spaulding	53.10	318.75	16,925.63
Cynthia L. Ney	19.40	175.00	3,395.00
	<hr/>	<hr/>	<hr/>
Totals:	162.00	376.53	\$ 60,998.18

Invoice No.: 1000096060
Re: SEC v. Beasley (Geoff Winkler, Receiver)
Matter No.: 209375.010100

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Description of Expenses Billed:

<u>DATE</u>	<u>DESCRIPTION</u>	<u>AMOUNT</u>
07/25/22	VENDOR: Hicks, Jason INVOICE#: 5312267308011805 DATE: 8/1/2022 Parking; 07/25/22 - PARKING FEE TO ATTEND JULY 25, 2022 HEARING ON MOTION TO EMPLOY COUNSEL BY RECEIVER, MOTION FOR HEARING BEFORE DISTRICT JUDGE RE 88 ORDER ON MOTION TO APPOINT RECEIVER; 119 MOTION TO AMEND/CORRECT 56 ORDER; 120 MOTION TO AMEND/CORRECT 88 ORDER ON MOTION TO APPOINT RECEIVER; AND 142 MOTION FOR RELEASE OF ATTORNEYS FEES, OR ALTERNATIVELY, FOR LEAVE TO WITHDRAW.	\$ 4.00
	Total Expenses:	\$ 4.00



Invoice No. : 1000142381
File No. : 209375.010100
Bill Date : November 9, 2022

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

Attn: Geoff Winkler

INVOICE

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

THIS INVOICE REPLACES INVOICE 1000112328

Total Fees: \$ 83,894.08

Expenses:

Information and Research 316.80

Total Expenses: \$ 316.80

Current Invoice: \$ 84,210.88

Previous Balance (see attached statement): \$ 122,381.16

Total Amount Due: \$ 206,592.04

KBH:LC
Tax ID: 13-3613083



Invoice No.: 1000142381
File No.: 209375.010100

REMITTANCE ADVICE

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

CLIENT NAME: WINKLER, GEOFF
FILE NUMBER: 209375.010100
INVOICE NUMBER: 1000142381*
BILLING PROFESSIONAL: Kara B. Hendricks

Current Invoice:	\$	84,210.88
Previous Balance:	\$	122,381.16
Total Amount Due:	\$	206,592.04

FOR YOUR CONVENIENCE, WIRE TRANSFER FUNDS TO:

For Wire Instructions:

Bank: WELLS FARGO BANK
ABA #: 121000248

For ACH Instructions:

Bank: WELLS FARGO BANK
ABA#: 063107513

CREDIT TO: GREENBERG TRAUIG DEPOSITORY ACCOUNT
ACCOUNT #: 2000014648663

PLEASE

REFERENCE: CLIENT NAME: WINKLER, GEOFF
FILE NUMBER: 209375.010100
INVOICE NUMBER: 1000142381*
BILLING
PROFESSIONAL: Kara B. Hendricks

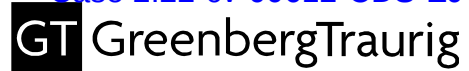
IF YOU WISH TO PAY BY CHECK PLEASE REMIT TO THE ADDRESS BELOW:

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

Wire fees may be assessed by your bank.

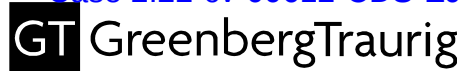
*** If paying more than one invoice, please reference all invoice numbers in wiring instructions.**

KBH:LC
Tax ID: 13-3613083



Invoice No. : 1000142381
File No. : 209375.010100

KBH:LC
Tax ID: 13-3613083



Invoice No. : 1000142381
File No. : 209375.010100

Account Statement

<u>Date</u>	<u>Invoice #</u>	<u>Fees Due</u>	<u>Expenses Due</u>	<u>Other Due</u>	<u>Total Due</u>
07/19/22	1000035547	16,627.52	0.00	0.00	16,627.52
10/03/22	1000096060	60,998.18	4.00	0.00	61,002.18
10/11/22	1000106463	43,799.26	952.20	0.00	44,751.46
	Totals:	\$ 121,424.96	\$ 956.20	\$ 0.00	\$ 122,381.16

KBH:LC
Tax ID: 13-3613083

Invoice No.: 1000142381
 Matter No.: 209375.010100

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Description of Professional Services Rendered:

TASK CODE: GW001 ASSET ANALYSIS AND RECOVERY

<u>DATE</u>	<u>TIMEKEEPER</u>	<u>DESCRIPTION</u>	<u>HOURS</u>	<u>AMOUNT</u>
08/01/22	Kyle Ewing	Telephonic communication with W. Horvath (counsel for promoter) re: payment to Draskovich firm and source of funds	0.20	68.00
08/01/22	Mark E. Ferrario	Telephone conference with receiver and follow up regarding class counsel issue.	0.30	184.88
08/01/22	Kara B. Hendricks	Review correspondence with M Cianfrani regarding account transfer information;	0.10	48.03
08/01/22	Kara B. Hendricks	Call from R. Yates regarding Judd properties that are for sale;	0.10	48.03
08/01/22	Kara B. Hendricks	Correspond with G. Windler regarding sales contract to facilitate asset recovery and review document used in prior matter to use as a template;	0.20	96.05
08/01/22	Kara B. Hendricks	Review email and additional information from J. del Castillo regarding upcoming filings and discuss with G. Winkler;	0.30	144.08
08/01/22	Kara B. Hendricks	Call with G. Winkler and M. Ferrario to discuss class action referral to collect assets on behalf of estate;	0.40	192.10
08/01/22	Kara B. Hendricks	Attention to response to motion requesting approval of sale procedures and correspond with J. del Castillo regarding same;	0.10	48.03
08/01/22	Kara B. Hendricks	Telephone call from M. Horvath regarding Beasley reporting request;	0.10	48.03
08/01/22	Kara B. Hendricks	Request C. Ney assistance with investor and asset information and organizing same;	0.20	96.05
08/01/22	Kara B. Hendricks	Email parties regarding reporting compliance with Appointment Order to get additional information need for assets recover efforts (parties contacted Beasley (.4), Jager (.3), Jongeward (.3), Seybert (.2), and Tanner (.2));	1.40	672.35
08/01/22	Kara B. Hendricks	Attention to motion to compel regarding K. Dean and follow-up regarding original source of funds we are seeking to recover, update declarations and finalize pleadings and exhibits;	1.30	624.33
08/01/22	Cynthia L. Ney	Review filings and update chart for K.Hendricks' review.	0.70	122.50
08/01/22	Cynthia L. Ney	Review Profit Connect file for draft sales agreement for use in Beasley matter, and communications with K.Hendricks regarding same.	0.40	70.00
08/02/22	Kara B. Hendricks	Call with M. Horvath regarding Beasley compliance with reporting and providing	0.20	96.05

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Description of Professional Services Rendered

08/02/22	Kara B. Hendricks	assets, tax information, etc.;		
		Review updated information regarding offer on L. Jeffries property and follow-up with G. Winkler regarding offer and proposed sales contract;	0.20	96.05
08/02/22	Kara B. Hendricks	Review correspondence from L. Palazzo regarding Jager expenses and requested financial information;	0.10	48.03
08/02/22	Kara B. Hendricks	Telephone call with A. Grisby regarding Paula Beasley assets and send update to G. Winkler regarding same;	0.40	192.10
08/02/22	Kara B. Hendricks	Correspond with D. Huish regarding Tanner report and document production requirements;	0.20	96.05
08/02/22	Kara B. Hendricks	Review correspondence from R. Goodman regarding L. Jefferies assets and proposal relating to same, follow-up with G. Winkler and request C. Ney pull lawsuits referenced;	0.20	96.05
08/02/22	Kara B. Hendricks	Attention to emails regarding funds held by US bank with security interests and mechanism for release of same;	0.10	48.03
08/02/22	Kara B. Hendricks	Revise draft order regarding Triple Threat and Rosegreen transfer of funds to Receiver and correspond with team regarding same;	0.70	336.18
08/02/22	Kara B. Hendricks	Respond to C. Spaulding inquires regarding motion for turnover and available asset lists;	0.10	48.03
08/02/22	Kara B. Hendricks	Update G. Winkler regarding communication regarding order compliance for Beasley, Jager, Joneward and Tanner and expected compliance with the same;	0.20	96.05
08/02/22	Kara B. Hendricks	Correspond with SEC, G. Winkler and Allen Matkins team regarding method to facilitate sale of Jeffery property;	0.40	192.10
08/02/22	Kara B. Hendricks	Attention to minute orders and filing requests relating to receivership reports;	0.20	96.05
08/02/22	Jason Hicks	Review correspondence from counsel and from SEC regarding proposed sale of 755 Pearl , Laguna Beach home (Jeffrey) and with receiver/receivership team re: mechanism for same.	0.10	36.12
08/02/22	Jason Hicks	Review Humphries' and CJ Investment's motion for release of funds for attorney's fees (ECF No 209)	0.20	72.25
08/02/22	Jason Hicks	Review Humphries' opposition (limited) to the Receiver's motion for order re residential property sale process (ECF No 212) and communications with receiver/receivership team regarding same.	0.10	36.12
08/02/22	Jason Hicks	Review motion for order to show cause/compel Kamille Dean to turn over	0.20	72.25

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Description of Professional Services Rendered

Date	Professional	Description	Hours	Amount
		\$201k (Judd) (ECF No 210)		
08/02/22	Cynthia L. Ney	Research regarding new complaints against Larry Jeffery.	0.50	87.50
08/02/22	Christian Spaulding	Evaluate Judd and Humphries' Statements regarding Receivership property and determine whether the same complies with court orders in the Order Appointing Receiver.	3.20	1,020.00
08/02/22	Christian Spaulding	Continue draft of Motion for turnover of assets seized by FBI.	1.10	350.63
08/02/22	Christian Spaulding	Draft summary of Statements filed by Humphries and Judd pursuant to Appointment Order and convey concerns and related issues regarding the same for K. Hendricks.	1.00	318.75
08/03/22	Kara B. Hendricks	Attention to emails regarding new defendants request for living expenses;	0.10	48.03
08/03/22	Kara B. Hendricks	Request C. Ney's assistance with downloading new information provided by M. Cook on behalf of M. Murphy;	0.10	48.03
08/03/22	Kara B. Hendricks	Respond to email from M. Cavenagh regarding potential purchase of Eco Bat;	0.10	48.03
08/03/22	Kara B. Hendricks	Follow-up regarding inquires regarding real estate agent assistance and Nevada needs;	0.10	48.03
08/03/22	Kara B. Hendricks	Follow-up with G. Winkler regarding contact with new defendants and next steps;	0.10	48.03
08/03/22	Kara B. Hendricks	Correspond with court administrator and telephone call to chambers regarding timing on stipulation that was filed;	0.10	48.03
08/03/22	Kara B. Hendricks	Work to facilitate stipulation regarding sale of Pearl Street property including reviewing and respond to email from R. Goodman regarding sale of Pearl Street property (.1); Telephone call from R. Goodman (.2); Updating G. Winkler and discuss proposed stipulation (.2); Request C. Ney assistance with tile information (.1); Preparing draft stipulation and circulate for comment (1.8); Correspond with interested parties and work towards finalizing stipulation (.6); Email court clerk heads-up regarding filing (.1); Update everyone regarding signed stipulation (.1);	3.30	1,584.83
08/03/22	Kara B. Hendricks	Respond to G. Winkler inquires regarding P. Beasley move and mortgage concerns;	0.10	48.03
08/03/22	Kara B. Hendricks	Review documents from title company regarding Jeffrey property in Laguna;	0.10	48.03
08/03/22	Kara B. Hendricks	Correspond with J. del Castillo regarding upcoming filings and division of work;	0.20	96.05
08/03/22	Kara B. Hendricks	Telephone call from M. Horvath regarding Beasley compliance request;	0.10	48.03

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Description of Professional Services Rendered

08/03/22	Kara B. Hendricks	Correspond with G. Winkler regarding third party complaints and concerns regarding diminishing assets and follow-up with R. Goodman regarding complaint filed against L. Jeffery;	0.20	96.05
08/03/22	Kara B. Hendricks	Follow-up regarding addendum needed for sale of properties;	0.10	48.03
08/03/22	Jason Hicks	Review information concerning Larry Jeffery's account at Horizon Trust Co.	0.10	36.12
08/03/22	Jason Hicks	Review draft stipulation and proposed order authorizing sale of Jeffery's home in Laguna Beach	0.10	36.12
08/03/22	Cynthia L. Ney	Download and organization of voluminous documents received from Marc Cook regarding M.Murphy.	1.10	192.50
08/03/22	Cynthia L. Ney	Review emails and documents and update task list for team call.	0.70	122.50
08/03/22	Cynthia L. Ney	Research regarding Laguna Beach property owned by Larry Jeffery (.4); communications with K.Hendricks regarding property (.1).	0.50	87.50
08/03/22	Christian Spaulding	Evaluate relevant case law and authority regarding the proper application of the Fifth Amendment privilege as it relates to this case.	5.20	1,657.50
08/03/22	Christian Spaulding	Summarize research regarding application of Fifth Amendment to the proceedings in this case for K. Hendricks.	1.20	382.50
08/04/22	Kara B. Hendricks	Attention to notice of breach and related documents regarding Ruffian property owned by Beasley including telephone call to tile company (.3); Prepare email to escrow officer regarding appoint order and Receiver's position (.2); Update G. Winkler (.1);	0.60	288.15
08/04/22	Kara B. Hendricks	Review reply in support of motion to retain funds held by Oberheiden;	0.10	48.03
08/04/22	Kara B. Hendricks	Return call to G. Ogata regarding information regarding Beasley assets and compliance with court order;	0.10	48.03
08/04/22	Kara B. Hendricks	Attention to emails with S. Jager regarding sale of Calle Francesca property;	0.10	48.03
08/04/22	Kara B. Hendricks	Prepare letter to A. Grisby re: P. Beasley assets and issues with lack of cooperation (1.4); and correspond with G. Winkler regarding additional items and information to include in same (.2);	1.40	672.35
08/04/22	Kara B. Hendricks	Correspond with C. Ney regarding documents received from Murphy counsel and early asset research;	0.10	48.03
08/04/22	Kara B. Hendricks	Telephone call to and follow-up email with B. Johnston regarding pending class action matter;	0.20	96.05

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Description of Professional Services Rendered

08/04/22	Kara B. Hendricks	Circulate task list to team for coordination call;	0.10	48.03
08/04/22	Kara B. Hendricks	Review task list and participate in team call to discuss case status, asset recovery efforts, and division of work;	1.20	576.30
08/04/22	Kara B. Hendricks	Correspond with K. Anderson regarding meeting to discuss turnover of assets and follow-up with team given the nature of the response and potential motion to compel;	1.10	528.28
08/04/22	Kara B. Hendricks	Follow-up with L. Maningo regarding status of Triple Threat stipulation;	0.10	48.03
08/04/22	Kara B. Hendricks	Attention to summary of information regarding Judd disclosures and 5th amend assertions and follow-up with K. Anderson regarding scheduling meeting with G. Winkler to discuss transition plan;	0.50	240.13
08/04/22	Kara B. Hendricks	Attention to emails from L. Maningo regarding compliance with court order and documents requested;	0.20	96.05
08/04/22	Kara B. Hendricks	Attention to requests and email from J. Jonegward regarding assets and compliance with court reporting orders;	0.40	192.10
08/04/22	Kara B. Hendricks	Respond to email from P. Johnston regarding stipulation and turnover of Humphries assets;	0.40	192.10
08/04/22	Kara B. Hendricks	Telephone call from K. Anderson and follow-up correspondence and discussions with G. Winkler regarding next steps;	1.10	528.28
08/04/22	Jason Hicks	Review draft letter to Paula Beasley regarding homes and vehicles in her possession and turnover deadlines.	0.10	36.12
08/04/22	Jason Hicks	Review correspondence concerning proposed sale of the 2008 Hawker 900XP jet	0.20	72.25
08/04/22	Jason Hicks	Review communications to / from Fabian Van Cott (Judd) regarding additional properties and discuss appropriate response with receiver.	0.20	72.25
08/04/22	Jason Hicks	Weekly strategy/update call with the receiver and receivership team to discuss status of asset identification, collection, liquidation; pending motions and required motions; next steps.	1.00	361.25
08/04/22	Cynthia L. Ney	Participate in weekly team meeting	0.90	157.50
08/04/22	Cynthia L. Ney	Communications with G.Winkler and K.Hendricks regarding asset documentation received.	0.10	17.50
08/04/22	Christian Spaulding	Confer with K. Hendricks regarding Judd and Humphries statements regarding receivership property and their compliance with the Court order.	0.30	95.63
08/04/22	Christian Spaulding	Confer with K. Hendricks and strategize regarding response to Defendants'	0.30	95.63

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Description of Professional Services Rendered

08/04/22	Christian Spaulding	invocation of Fifth Amendment privilege. Evaluate correspondence with counsel for P. Beasley regarding property to be surrendered.	0.20	63.75
08/04/22	Christian Spaulding	Participate with K. Hendricks in call with K. Anderson, counsel for Jeffrey Judd regarding procedure for transfer of property and assets and related issues.	0.50	159.38
08/04/22	Christian Spaulding	Evaluate notice of special appearance on behalf of Pezzuto entities and their relation to case.	0.20	63.75
08/05/22	Kara B. Hendricks	Review various emails from G. Winkler and team regarding asset evaluation and recover efforts;	0.20	96.05
08/05/22	Kara B. Hendricks	Update team regarding communication regarding outstanding requests for information from Judd and Humphries;	0.20	96.05
08/05/22	Kara B. Hendricks	Telephone call with R. Goodman regarding pending lawsuits, information provided by Jeffery, and asset recovery efforts,	0.20	96.05
08/05/22	Kara B. Hendricks	Revise correspondence to new defendants providing a copy of appointment orders and requesting meeting and work with C. Ney to finalize same;	0.50	240.13
08/05/22	Kara B. Hendricks	Review correspondence from R. Draskovich office regarding Beasley demands and follow-up;	0.10	48.03
08/05/22	Kara B. Hendricks	Review Seybert and Rocking Horse disclosure of assets;	0.10	48.03
08/05/22	Kara B. Hendricks	Correspond with R. Goodman regarding L. Jefferys concerns including livings expenses, sale of house, and bank accounts;	0.10	48.03
08/05/22	Kara B. Hendricks	Telephone call with G. Winkler regarding sale of Jager property (.1); Email SEC regarding willingness to stipulate to sale (.1); Review sales information and prepare draft stipulation (1.2);	1.40	672.35
08/05/22	Kara B. Hendricks	Respond to emails from J. Jongeward regarding additional document production and additional financial information regarding assets and follow-up with C. Ney regarding same;	0.20	96.05
08/05/22	Kara B. Hendricks	Respond to email from K. Anderson regarding call to discuss Judd asset turnover;	0.10	48.03
08/05/22	Kara B. Hendricks	Attention to correspondence from G. Winkler and follow-up regarding P. Beasley living allowance;	0.10	48.03
08/05/22	Jason Hicks	Review stip and order on proposed sale of Jager property 305 Calle Francesca, and communications with receiver re same	0.10	36.12
08/05/22	Jason Hicks	Review correspondence from Draskovich firm (Beasley criminal atty) regarding civil	0.10	36.19

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Description of Professional Services Rendered

Date	Professional	Description of Services	Hours	Amount
08/05/22	Jason Hicks	case Review correspondence re Fabian Vancott/Jeff Anderson (Judd) and coordination re turnover of remaining Judd properties	0.10	36.12
08/05/22	Cynthia L. Ney	Review court docket and update party list regarding new defendants	0.40	70.00
08/05/22	Cynthia L. Ney	Prepare letter to new defendants.	0.70	122.50
08/05/22	Cynthia L. Ney	Download and organization of Denny Seybert materials received and communications with G.Winkler regarding same.	0.80	140.00
08/05/22	Cynthia L. Ney	Review pleadings regarding Paula Beasley living expenses (.1); communications with K.Hendricks regarding same (.1)	0.20	35.00
08/05/22	Cynthia L. Ney	Research regarding property owned by S.Jager.	0.30	52.50
08/05/22	Cynthia L. Ney	Forward secure file request to J.Jongeward.	0.10	17.50
08/05/22	Christian Spaulding	Evaluate issues to be addressed and support for Response to Humphries's Motion for Release of Funds for Attorneys Fees. Begin draft of the same.	2.20	701.25
08/06/22	Kara B. Hendricks	Review Jager sale documents and correspond with G. Winkler regarding facilitating same;	0.10	48.03
08/06/22	Jason Hicks	Review court's order on Receiver's report and recommendation regarding the Chapter 11 cases (ECF no 231)	0.10	36.12
08/06/22	Jason Hicks	Review Seybert/Rocking Horse Properties' statement pursuant to appointment order (ECF no 232)	0.10	36.12
08/08/22	Kara B. Hendricks	Review and revise motion for turnover of assets held by federal agencies and follow-up with C. Spaulding regarding same;	0.50	240.13
08/08/22	Kara B. Hendricks	Review court order regarding Fabian VanCott and Oberheiden fee motions and requirements for compliance with prior order and turn over of funds;	0.30	144.08
08/08/22	Kara B. Hendricks	Attention to email from G. Ogata's firm regarding withdraw from civil case and follow-up regarding information required to be provided pursuant to Appointment Order;	0.20	96.05
08/08/22	Kara B. Hendricks	Telephone call from R. Brace regarding ongoing litigation and asset recovery matters;	0.20	96.05
08/08/22	Kara B. Hendricks	Finalize correspondence to defendants Rohner, Johnson, R. Madsen, C. Madsen to schedule meeting with Receiver to discuss assets and next steps;	0.30	144.08
08/08/22	Kara B. Hendricks	Review order amending relief as to C. Madsen and ACAC and businesses excluded from turnover requirements;	0.10	48.03

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Description of Professional Services Rendered

Date	Professional	Description	Hours	Amount
08/08/22	Kara B. Hendricks	Correspond with G. Winkler regarding communication with new defendants and asset recover efforts, class counsel, and new orders from court;	0.20	96.05
08/08/22	Kara B. Hendricks	Attention to information from M. Dobar regarding Ruffian house loan reinstatement and forward to A. Grisby and update G. Winkler regarding same;	0.30	144.08
08/08/22	Kara B. Hendricks	Telephone call with M. Dobar regarding Paula Beasley property, status of foreclosure and next steps;	0.20	96.05
08/08/22	Kara B. Hendricks	Work with C. Spaulding on response to Humphries motion for fees;	0.20	96.05
08/08/22	Kara B. Hendricks	Follow-up with C. Fronk regarding finalizing stipulation to sale Calle Francesca property(.1); Update and finalize stipulation for same (.1);	0.20	96.05
08/08/22	Kara B. Hendricks	Email counsel impacted by fee order and provide copy of wire instruction and direction to initiate transfer of funds today (K. Anderson, Nick at Oberheriden and K. Dean);	0.60	288.15
08/08/22	Kara B. Hendricks	Update filings to reference coordinate efforts between various law firms and work to move receivership forward;	1.80	864.45
08/08/22	Kara B. Hendricks	Attention to email and documents regarding proposed intervener's and class action complaint and illicit input from team members regarding the same;	0.80	384.20
08/08/22	Kara B. Hendricks	Correspond with K. Anderson regarding scheduled meeting to discuss transfer of assets, court order and contact with Judd going forward;	0.20	96.05
08/08/22	Jason Hicks	Review communications from counsel at Law Office of George W. Cochran regarding his desire to move to intervene on behalf of a class in the receivership action and his draft complaint and motion to intervene, and strategize amongst receiver and receivership team re: position on same.	0.40	144.50
08/08/22	Jason Hicks	Review court's order on Fabian VanCott and Oberheiden firms' motions to retain funds / withdraw (ECF 235) and communications regarding same	0.30	108.37
08/08/22	Cynthia L. Ney	Finalize various letters to new defendants and their counsel and forwarding of same.	0.70	122.50
08/08/22	Cynthia L. Ney	Review court docket and update party contacts list and pull documentation for K.Hendricks' review.	0.80	140.00
08/08/22	Cynthia L. Ney	Research regarding Jason Jenne and communications with K.Hendricks regarding same and defendant letters.	0.30	52.50

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Date	Attorney	Description of Services	Hours	Amount
08/08/22	Christian Spaulding	Evaluate Masden's Emergency Motion for Reconsideration of (1) Order Amending Preliminary Injunction and Asset Freeze Order and (2) Order Amending Receivership Order.	0.50	159.38
08/08/22	Christian Spaulding	Evaluate Court's Order Denying and Granting in Part Judd's Motion to Release Funds and Oberheiden's Motion to Release Funds.	0.40	127.50
08/08/22	Christian Spaulding	Continue evaluation of relevant authority in support for Response to Humphries' Motion to Release Funds and continue draft of the same.	7.30	2,326.88
08/09/22	Kara B. Hendricks	Confer with G. Winkler and D. Zaro on class concerns and priorities to ensure recover on behalf of estate;	0.60	288.15
08/09/22	Kara B. Hendricks	Attention to emails regarding attorney retainers that were not returned and work with team to define next steps;	0.10	48.03
08/09/22	Kara B. Hendricks	Call with C. Fronk and T. Combs regarding intervention request;	0.40	192.10
08/09/22	Kara B. Hendricks	Attention to emails from J. Jongeward and T. Ericsson regarding investor and payment records and delays associated with federal proceedings and related follow-up;	0.20	96.05
08/09/22	Kara B. Hendricks	Call to J. Beltran regarding stipulation for sale of Jager property and update G. Winkler regarding status;	0.10	48.03
08/09/22	Kara B. Hendricks	Discussion with class action counsel regarding pending action and potential to consolidate efforts to obtain additional assets for receiver;	0.50	240.13
08/09/22	Kara B. Hendricks	Continue efforts to evaluate class counsel including responding to email from B. Johnston regarding call with class action team (.1); Additional correspondence with G. Winkler and D. Zaro regarding class action due diligence (.3); Follow-up with Johnston and Brace to schedule call (.1); Review summary provided to court regard class action matters (.1);	0.50	240.13
08/09/22	Kara B. Hendricks	Provide T. Combs requested documents for review and follow-up with C. Ney to finalize motion and exhibits for filing;	0.40	192.10
08/09/22	Jason Hicks	Review court's order (ECF No 244) denying Madsen motion for reconsideration (ECF No 236)	0.10	36.12
08/09/22	Jason Hicks	Review motion / order for Garrett Ogata to withdraw as counsel for Beasley (ECF 241)	0.10	36.12
08/09/22	Jason Hicks	Review correspondence with team regarding various Judd/Beasley attorney status of withholding retainer payments and next steps	0.20	72.25

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Description of Professional Services Rendered

Date	Professional	Description	Hours	Amount
08/09/22	Christian Spaulding	Continue and finalize draft of Response in Opposition to Humphries' Motion to Release Funds and email to K. Hendricks regarding the same.	8.20	2,613.75
08/10/22	Kara B. Hendricks	Revise response to Humphries request for fees and circulate to G. Winkler and team for comment;	1.70	816.43
08/10/22	Kara B. Hendricks	Work with C. Spaulding on letter to counsel regarding Nolan claim requesting stay;	0.20	96.05
08/10/22	Kara B. Hendricks	Follow-up with R. Goodman regarding letter to counsel with claims asserted against R. Jeffery;	0.10	48.03
08/10/22	Kara B. Hendricks	Attention to proposal for L. Jefferies living expenses and correspond with G. Winkler regarding same including impact on assets recovery and proposed action in response to CA complaint;	0.30	144.08
08/10/22	Kara B. Hendricks	Attention to communication regarding bankruptcy claims bar deadline;	0.10	48.03
08/10/22	Kara B. Hendricks	Revise letter to T. Shields regarding Jeffrey litigation and update so it can be used as template going forward when claims are asserted against Receivership defendants and stay is necessary to preserve assets (.4); Correspond with G. Winkler regarding timing and next steps in regarding to claims filed by T. Shields (.1);	0.50	240.13
08/10/22	Kara B. Hendricks	Attention to email from R. Reed regarding mechanics lien on Sky Arc property and follow-up with R. Reed and G. Winkler regarding same;	0.20	96.05
08/10/22	Kara B. Hendricks	Attention to correspondence from K. Dean regarding turnover of funds and proposed settlement discussions;	0.20	96.05
08/10/22	Kara B. Hendricks	Correspond with G. Winkler regarding funds Jager paid to outside counsel;	0.10	48.03
08/10/22	Cynthia L. Ney	Electronic organization of various defendants' documentation.	0.60	105.00
08/10/22	Christian Spaulding	Evaluate filing in Nolan v. Jeffery and draft letter to Timothy F. Shields regarding stay of the same under the Receivership Order.	1.20	382.50
08/10/22	Christian Spaulding	Review and incorporate revisions in Response in Opposition to Humphries' Motion to Retain Fees	0.60	191.16
08/10/22	Christian Spaulding	Review comments and edits on Motion for Turnover of Property held by FBI, incorporate the same and finalize draft.	1.10	350.63
08/11/22	Kara B. Hendricks	Respond to K. Dean email regarding funds provided to Judd and pending motion;	0.10	48.03
08/11/22	Kara B. Hendricks	Follow-up with C. Ney regarding addendum for property sales person contracts;	0.20	96.05

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08/11/22	Kara B. Hendricks	Review information regarding proposed asset sale by D. Seybert and follow-up with G. Winkler regarding next steps;	0.20	96.05
08/11/22	Kara B. Hendricks	Follow-up with A. Grisby regarding turnover of Ruffian house and prior correspondence relating to same;	0.10	48.03
08/11/22	Kara B. Hendricks	Participate in call with Las Vegas Realtor (K. Siberman) regarding sale of Las Vegas properties turned over to Receiver and information needed for motion to employ;	0.50	240.13
08/11/22	Kara B. Hendricks	Correspond with M. Cavanaugh regarding Eco Bat next steps;	0.20	96.05
08/11/22	Kara B. Hendricks	Request A. Levine assistance with upcoming motions and calls regarding defendant assets and provide relevant case background to aide with same;	0.50	240.13
08/11/22	Kara B. Hendricks	Review information regarding mechanics lien on Judd property and correspond with R. Reeve regarding protecting receivership assets;	0.10	48.03
08/11/22	Kara B. Hendricks	Attention to emails and comments relating to Response to Humphries motion to retain funds, address same in Response and work with P. January to finalize same;	0.20	96.05
08/11/22	Kara B. Hendricks	Respond to email from N. Oberheiden regarding Judd turnover plan and next steps;	0.10	48.03
08/11/22	Kara B. Hendricks	Confer with G. Winkler regarding real property sales plan, Eco Battery evaluation, discussions with defendants and upcoming deadlines;	0.40	192.10
08/11/22	Kara B. Hendricks	Participate in call with Realtor regarding sale of South Lake Tahoe property and logistics associated with same and review related materials;	0.60	288.15
08/11/22	Kara B. Hendricks	Review emails regarding property owned by Jager and proposed purchase of interest in same and follow-up with G. Winkler;	0.20	96.05
08/11/22	Kara B. Hendricks	Begin preparing motion to employ real estate professional and professional to assist with sale of vehicles to maximize recovery for estate (1.5); Correspond with A. Deering regarding background information for real estate professional need for motion (.2); Email B. Tranquil to obtain additional information need for motion regarding experience with sale of vehicles; Correspond with C. Spaulding regarding research need for motion and assistance with preparing same (.2);	1.90	912.48
08/11/22	Cynthia L. Ney	Review file, compile documents and forward to K.Hendricks for review.	0.40	70.00
08/11/22	Cynthia L. Ney	Review dockets of Wells Fargo matter	0.40	70.00

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		regarding fee requests and communications with K.Hendricks regarding same.		
08/11/22	Cynthia L. Ney	Update team task list and forward same to K.Hendricks.	0.50	87.50
08/11/22	Christian Spaulding	Evaluate relevant case law regarding employment of professionals to assist in the sale of real property and vehicles for inclusion in Motion to Employ Real Estate Agents and Professional to Assist in Selling Real Property and Vehicles.	1.80	573.75
08/11/22	Christian Spaulding	Draft argument regarding court's authority with respect to employment of professionals to assist in sale of real property and vehicles.	1.50	478.13
08/12/22	Kara B. Hendricks	Confer with J. Hall regarding information need for application to be filed with court and work with C. Ney to finalize related exhibits;	0.20	96.05
08/12/22	Kara B. Hendricks	Attention to class action document and filings and follow-up regarding counsel issues;	0.30	144.08
08/12/22	Kara B. Hendricks	Correspond with D. Clukey regarding Johnson and Rohner assets and turnover;	0.30	144.08
08/12/22	Kara B. Hendricks	Attention to research regarding La Canasta Furnishings (lender foreclosing on Beasley Tahoe property) and forward to G. Winkler;	0.20	96.05
08/12/22	Kara B. Hendricks	Participate in team call to discuss status of recovery efforts, next steps and priorities, division of work, etc.	0.90	432.23
08/12/22	Kara B. Hendricks	Review correspondence from N. Oberheiden regarding communication with Judd regarding asset turnover and scope of representation;	0.10	48.03
08/12/22	Kara B. Hendricks	Prepare addendum to listing agreement with receivership terms and conditions;	0.50	240.13
08/12/22	Kara B. Hendricks	Correspond with K. Rough regarding listing agreement and Receivership conditions;	0.10	48.03
08/12/22	Kara B. Hendricks	Continue preparation of motion to employ professionals with emphasis on experience and expertise of same (1.6); Follow-up with B. Tranquillo regarding information need for application (.1); Follow-up with K. Routh-Siberman regarding additional information needed for same (.1);	1.80	864.45
08/12/22	Kara B. Hendricks	Confirm with C. Ney regarding researching Beasley lender and foreclosure notice on South Lake Tahoe property;	0.20	96.05
08/12/22	Kara B. Hendricks	Attention to proposed sales documents for Beasley Tahoe property and provide comments and draft addendum to include with same;	0.20	96.05

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Date	Professional	Description of Services	Hours	Amount
08/12/22	Kara B. Hendricks	Attention to draft stipulations and communication regarding assets and living expenses for Johnson and Rohner (.2); Telephone call with C. Fronk and G. Winkler to discuss same (.4);	0.60	288.15
08/12/22	Kara B. Hendricks	Attention to email and information provided by M. Cook regarding M. Murphy investor and investment lists;	0.10	47.26
08/12/22	Jason Hicks	Weekly strategy call with Receiver and receivership team to discuss status of asset identification and turnover efforts, court/motion status and potential further necessary motion practice, and related action items.	1.00	361.25
08/12/22	Cynthia L. Ney	Compilation of materials for K.Hendricks review.	0.40	70.00
08/12/22	Cynthia L. Ney	Participate in weekly team call.	1.00	175.00
08/12/22	Cynthia L. Ney	Research regarding La Canasta Furnishings who claim to be a lien holder on Beasley Lake Tahoe property and communications with K.Hendricks regarding same.	0.50	87.50
08/15/22	Akke Levin	Attend meeting with Ryan Reed and Geoff Winkler re lien for solar services.	0.10	46.75
08/15/22	Cynthia L. Ney	Email communications with and forwarding of D.Seybert materials to A.Deering.	0.30	52.50
08/16/22	Kara B. Hendricks	Call with D. Cluckey and G. Winkler to discuss Johnson and Rohner documents, assets, and turnover plan;	0.40	192.10
08/16/22	Kara B. Hendricks	Respond to email from M. Cavenuagh regarding Eco battery and information needed by the receiver to further evaluate assets;	0.20	96.05
08/16/22	Kara B. Hendricks	Review draft stipulation regarding US bank release of Judd funds and secured interest in Huntington house and correspond with G. Winkler and J. delCastillo regarding additional considerations;	0.20	96.05
08/16/22	Kara B. Hendricks	Review information provided by A. Grigsby regarding house payment (Ruffian Road) and follow-up with G. Winkler(.2); Respond to A. Grisby email and outline additional information requested and timeline for turnover (.3);	0.50	240.13
08/16/22	Kara B. Hendricks	Follow-up regarding court filings;	0.10	48.03
08/16/22	Kara B. Hendricks	Attention to Mike Levin asset transfer communication;	0.10	48.03
08/16/22	Kara B. Hendricks	Attention to multiple documents provide by K. Dean including opposition to motion to compel, motion to strike, objection to affidavits, motion for leave to file interpleader(.6); Discuss preparation of response to same with C. Spaulding and	0.90	432.23

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08/16/22	Kara B. Hendricks	outline issues to address (.2); Respond to email from C. Fronk regarding same (.1); Follow-up with C. Spaulding regarding motion to employ professionals including providing additional information regarding rate reduction and scope of work (.3); Correspond with A. Deering regarding UT Realtor and timing for motion to employ (.1);	0.40	192.10
08/16/22	Kara B. Hendricks	Review supporting documents submitted with D. Motion and prepare email to K. Dean to clarify issues therein and seeking documents supporting retainer claims;	0.30	144.08
08/16/22	Kara B. Hendricks	Review assets list provided by G. Winkler;	0.10	48.03
08/16/22	Kara B. Hendricks	Work with counsel for Eco Bat to schedule call with business leaders to further discuss pending issues;	0.20	96.05
08/16/22	Kara B. Hendricks	Attention to correspondence from M. Cianfrani regarding Coinbase transfer to Receiver;	0.10	48.03
08/16/22	Kara B. Hendricks	Attention to emails regarding Seybert document production and follow-up with G. Winkler regarding request for sale of ownership interest and SEC position regarding same;	0.10	48.03
08/16/22	Kara B. Hendricks	Call with G. Winkler and team to discuss pending matters including forensic accounting, Roshak settlement updates, plans for asset recovery moving forward;	0.60	288.15
08/16/22	Kara B. Hendricks	Attention to emails regarding Triple Threat stipulation from J. del Castillo (.1); Forward draft stipulation to L. Maningo for review and signature (.1);	0.20	96.05
08/16/22	Kara B. Hendricks	Research background regarding M. Jaroscak and relationship with K. Dean;	0.20	96.05
08/16/22	Kara B. Hendricks	Attention to emails from L. Maningo regarding Rosegreen funds held by Wells Fargo (.3); Follow-up with SEC regarding proposes stipulation regarding same (.1); Follow-up with G. Winkler and J. delCastillo regarding discrepancies in draft stipulations (.1);	0.50	240.13
08/16/22	Kara B. Hendricks	Attention to correspondence from T. Shields regarding pending action against Jeffery and follow-up with G. Winkler regarding same;	0.20	96.05
08/16/22	Christian Spaulding	Confer with team regarding arguments to be made in response to Motions filed by K. Dean and deadlines for the same.	0.90	286.88
08/16/22	Christian Spaulding	Evaluate correspondence from George & Shields, LLP regarding request to stay California litigation pursuant to District of Nevada order.	0.20	63.75

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Description of Professional Services Rendered

Date	Professional	Description of Services	Hours	Amount
08/16/22	Christian Spaulding	Continue draft of Motion to Employ Professionals to Assist with the Sale of Property and Vehicles.	2.10	669.38
08/16/22	Christian Spaulding	Draft Declaration of Kristen Routh-Silberman in Support of Motion to Employ Professionals.	0.50	159.38
08/17/22	Kara B. Hendricks	Correspond with K. Hogan regarding J. Jenne asset and plan;	0.20	96.05
08/17/22	Kara B. Hendricks	Update motion and declarations in support of motion to employ professionals to assist with asset sales based on comments from T. Wohl and B. Tranquillo;	0.30	144.08
08/17/22	Kara B. Hendricks	Correspond with G. Winkler regarding proposed stipulation for living expenses of W. Rosegreen;	0.10	48.03
08/17/22	Kara B. Hendricks	Revise Rhoner stipulation to facilitate filing and correspond with D. Cluckey and C. Fronk regarding same;	0.40	192.10
08/17/22	Kara B. Hendricks	Follow-up with N. Savino regarding subpoena and supplemental response	0.20	96.05
08/17/22	Kara B. Hendricks	Review case law regarding stay of proceedings and to address letter received in Nolan case;	0.10	48.03
08/17/22	Kara B. Hendricks	Respond to email from L. Bragnaca regarding R. Madsen assets and position;	0.10	48.03
08/17/22	Kara B. Hendricks	Correspond with G. Winkler regarding meetings with counsel for Madsen and Jenne to discuss assets and turnover;	0.10	48.03
08/17/22	Kara B. Hendricks	Attention to motion to employ including adding information regarding Ben Tranquillo methodology and pay structure and review and revisions to declarations of B. Tranquillo, T. Wahl and K. Routh-Silberman (1.6); Circulate draft declarations for review and comment to B. Tranquillo, T. Wahl and K. Routh-Silberman (2);	1.80	864.45
08/17/22	Kara B. Hendricks	Attention to email and documents to support mechanics lien at Sky Arc and request A. Levin's assistance with review and analysis of same;	0.10	48.03
08/17/22	Kara B. Hendricks	Attention to emails regarding Rhoner living expenses stipulation;	0.10	48.03
08/17/22	Kara B. Hendricks	Conference with C. Fronk and G Winkler regarding W. Rosegreen stipulation and other defendant requests (.4); Prepare response to L. Maningo email regarding Rosegreen discussion with SEC and next steps (.2);	0.60	288.15
08/17/22	Kara B. Hendricks	Respond to emails from M. Robers regarding requested documents from counsel for Jager regarding assets and investor information;	0.10	48.03

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08/17/22	Kara B. Hendricks	Attention to Rosegreen stipulation including follow-up with G. Winkler and C. Fronk regarding same;	0.20	96.05
08/17/22	Kara B. Hendricks	Attention to correspondence regarding funds provided by/held by Am Marshall;	0.10	48.03
08/17/22	Kara B. Hendricks	Attention to lender service information for Beasley Tahoe property and evaluate next steps;	0.10	48.03
08/17/22	Akke Levin	Review invoice of Lithion Battery, Inc. and invoices of its counsel (LKG) [0.4]; look into Lithion's service products and BESS models [0.2] and draft thoughts and suggestions on invoices for Kara Hendricks [0.5].	1.10	514.25
08/17/22	Akke Levin	Research re case law on stay of state court cases to facilitate and protect receiver case [2.2]; draft brief memo re same for Kara Hendricks [1.2].	3.40	1,589.50
08/17/22	Cynthia L. Ney	Review recent court filings and email communications regarding investor meeting and assets.	0.30	52.50
08/17/22	Christian Spaulding	Finalize draft of Motion to Employ Professional to Assist with Sale of Property and Vehicles and declarations in support thereof.	1.90	605.63
08/18/22	Kara B. Hendricks	Attention to reinstatement documents for Beasley Tahoe property and forward to G. Winkler for review;	0.30	144.08
08/18/22	Kara B. Hendricks	Correspond with K. Hogan to schedule meeting to discuss Jenne assets and related issues;	0.10	48.03
08/18/22	Kara B. Hendricks	Follow-up with B. Tranquillo and K. Routh Siberman and finalize declarations for motion to employ;	0.20	96.05
08/18/22	Kara B. Hendricks	Review supplemental information provided from M. Cook regarding Murphy assets;	0.10	48.03
08/18/22	Kara B. Hendricks	Follow-up with potential counsel and provide additional background regarding claims being considered by receiver in which outside counsel is needed and provide documents regarding claims asserted against Wells Fargo for further discussion ;	0.80	384.20
08/18/22	Kara B. Hendricks	Call with counsel for R. Madsen regarding assets and next steps;	0.40	192.10
08/18/22	Kara B. Hendricks	Provide A. Grisby payout information for South Lake Tahoe property;	0.10	48.03
08/18/22	Kara B. Hendricks	Correspond with T. Wohl regarding revisions to declaration and update same and make corresponding changes to motion to employ;	0.60	288.15
08/18/22	Kara B. Hendricks	Review court filings in Wells Fargo matter including stipulation regarding counsel,	0.30	144.08

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08/18/22	Kara B. Hendricks	complaint and motion to dismiss and provide same to G. Winkler; Review investor meeting notice and forward to additional requesting parties (.1); Follow-up with GT team regarding investor meeting logistics (.2);	0.30	144.08
08/18/22	Kara B. Hendricks	Conference call with M. Leavitt, G. Winkler and others regarding sale of Jager and Madsen interest in Grand Desert Behavioral Hospital (.4); Debrief with G. Winkler and A. Deering regarding same (.2);	0.60	288.15
08/18/22	Kara B. Hendricks	Confer with G. Winkler regarding contact with defendants and proposals for turnover;	0.30	144.08
08/18/22	Kara B. Hendricks	Correspond via email and telephone with L. Maningo regarding Triple Threat and Rosegreen stipulation;	0.30	144.08
08/18/22	Kara B. Hendricks	Correspond with L. Bragnaca regarding R. Madsen and meeting to discuss assets;	0.10	48.03
08/18/22	Kara B. Hendricks	Telephone call to FCI Lender Services to get information regarding Beasley South Lake Tahoe property(x2) (.4); Send follow-up email and provide copy of receivership order (.2); Update G. Winkler regarding same (.1);	0.70	336.18
08/18/22	Cynthia L. Ney	Review and edit motion to employ real estate and professional to sell cars (.8); communications with K.Hendricks regarding same (.2).	1.00	175.00
08/18/22	Cynthia L. Ney	Communications and forwarding of S.Jager materials to A.Deering.	0.20	35.00
08/18/22	Christian Spaulding	Draft Proposed Order Granting Motion to Employ Professionals to Assist with Sale of Property and Vehicles	0.30	95.63
08/18/22	Christian Spaulding	Confer and coordinate with team regarding final versions of Motion to Employ Professionals to Assist with Sale of Property and Vehicles.	0.30	95.63
08/19/22	Kara B. Hendricks	Gather information regarding potential new realtor's with background needed and provide to G. Winkler and A. Deering;	0.30	144.08
08/19/22	Kara B. Hendricks	Update G. Winkler regarding pending issues including Realtor follow-up and attempts to obtain keys for additional properties;	0.20	96.05
08/19/22	Kara B. Hendricks	Correspond with J. Rickard regarding inquiry he received regarding R. Madsen fees and follow-up with C. Perkins regarding same.	0.10	48.03
08/19/22	Kara B. Hendricks	Work with GT tech team to facilitate upcoming investor meeting, provide set up instructions, circulate Zoom information based on multiple calls received requesting	0.60	288.15

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08/19/22	Kara B. Hendricks	same; Review analysis of reinstatement from J. McGraw regarding South Lake Tahoe Property (.2); Email B. Mansilla to obtain underlying loan documents and statement regarding payments (.1);	0.30	144.08
08/19/22	Kara B. Hendricks	Follow-up with C. Spaulding regarding preparation of response to K. Dean motions and provide additional guidance regarding same including updated time summary;	0.30	144.08
08/19/22	Kara B. Hendricks	Call with C. Fronk to discuss K. Dean filings and background regarding funds at issue;	0.20	96.05
08/19/22	Kara B. Hendricks	Telephone call to A. Grisby to confirm time to pick up keys to Ruffian house;	0.10	48.03
08/19/22	Kara B. Hendricks	Telephone call with A. Deering regarding real estate agent concerns;	0.10	48.03
08/19/22	Kara B. Hendricks	Review information provided by investor regarding Jager and request C. Ney further research references to bug companies in filings;	0.20	96.05
08/19/22	Kara B. Hendricks	Work with B. Mansilla and G. Winkler to obtain documents related to South Lake Tahoe property;	0.10	48.03
08/19/22	Kara B. Hendricks	Participate in call with G. Winkler and team to review assets recovery efforts, coordinate efforts going forward and discuss next steps;	1.20	576.30
08/19/22	Kara B. Hendricks	Review information provided by investor regarding K. Routh-Siberman and follow-up to clarify facts (.4); Cross reference declaration and filings with new information received (.2); Review response to inquiry from K. Routh-Siberman and correspond with G. Winkler regarding same (.2);	0.80	384.20
08/19/22	Christian Spaulding	Evaluate motions filed by Kamille Dean (ECF Nos. 257, 258, 259, and 260) in anticipation of preparing response to same;	1.50	478.13
08/20/22	Kara B. Hendricks	Attention to emails regarding Realtor concerns and request additional information from J. DiRaffaele for declaration;	0.20	96.05
08/22/22	Kara B. Hendricks	Prepare errata to motion to employ and declaration for J. DiRaffaele in support of retention as Nevada Realtor (1.4); Incorporate comments into errata and declaration and prepare for filing (.5);	1.90	912.48
08/22/22	Kara B. Hendricks	Meet with G. Winkler, A. Deering and J. Hall in advance of investor meeting to discuss and prepare for same;	0.50	240.13
08/22/22	Kara B. Hendricks	Respond to email from K. Dean regarding pending motions and funds received from	0.10	48.03

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		Judd;		
08/22/22	Kara B. Hendricks	Review emails and correspondence from A. Grisby regarding Beasley asset turnover and document requests and follow-up regarding issues raised therein with both A. Grisby and G. Winkler;	0.30	144.08
08/22/22	Kara B. Hendricks	Participate in interview of potential counsel to assist with financial institution claims with G. Winkler, J. Hall and A. Deering;	1.10	528.28
08/22/22	Kara B. Hendricks	Review draft stipulation for Madsen living expenses and correspond with G. Winkler regarding same;	0.10	48.03
08/22/22	Kara B. Hendricks	Review email communication and documents from D. Cluckey regarding Johnson assets and ability to secure funds for the Receiver;	0.10	48.03
08/22/22	Kara B. Hendricks	Follow-up with J. diRaffaele regarding information needed for declaration;	0.10	48.03
08/22/22	Kara B. Hendricks	Attention to emails regarding South Lake Tahoe property including new reinstatement quote and correspondence from B. Mansilla regarding underlying loan documents;	0.20	96.05
08/22/22	Cynthia L. Ney	Download documents received regarding Beasley's South Lake Tahoe property, electronic organization of same and forwarding to K.Hendricks for review.	0.30	52.50
08/22/22	Cynthia L. Ney	Review consolidated cases involving Wells Fargo for pleading responses (.2); obtain updated docket (.1); communications with K.Hendricks regarding same (.1).	0.40	70.00
08/22/22	Cynthia L. Ney	Review file regarding Jager assets and connections to various pest companies and communications with K.Hendricks regarding same.	0.90	157.50
08/22/22	Cynthia L. Ney	Review file regarding S.Johnson and C.Rohner's statements and assets and communications with K.Hendricks regarding same.	0.40	70.00
08/22/22	Cynthia L. Ney	Review motion and declaration and editing of errata to motion to employ professionals (.4); communications with K.Hendricks regarding same (.1).	0.50	87.50
08/22/22	Christian Spaulding	Evaluate errata to Motion to Employ Professionals to Assist with Sale of Property and Vehicles and draft Revised Proposed Order therefor.	0.40	127.50
08/23/22	Kara B. Hendricks	Correspond with R. Goodman regarding pending suit against Jeffery in CA;	0.10	48.03
08/23/22	Kara B. Hendricks	Telephone call from J. Di Raffaele regarding motion to employ and next steps and send follow-up email with copies of filed documents;	0.20	96.05

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Description of Professional Services Rendered

08/23/22	Kara B. Hendricks	Email P. Johnson and C. Humphries team regarding requested documents and turnover of house and Jeep;	0.20	96.05
08/23/22	Kara B. Hendricks	Review report and recommendation regarding liquidation and provide comments and feedback regarding same;	0.30	144.08
08/23/22	Kara B. Hendricks	Review email from R. Reed regarding release of lien on receivership property;	0.10	48.03
08/23/22	Kara B. Hendricks	Telephone call with G. Winkler re: concerns regarding Beasley turnover of assets (x2)(.2); Prepare correspondence to A. Grisby to further address same and follow-up regarding requested documents (.7); Update letter based on new information from G. Winkler (.2);	1.10	528.28
08/23/22	Kara B. Hendricks	Telephone call from Boris regarding Beasley mortgage documents for South Lake Tahoe property;	0.10	48.03
08/23/22	Kara B. Hendricks	Attention to investor inquiries including request for video and request for additional information (G. Mangum) and apprise A. Deering of same;	0.20	96.05
08/23/22	Kara B. Hendricks	Review list of accounts and information in J. Jenne notice of compliance;	0.10	48.03
08/23/22	Kara B. Hendricks	Prepare response letter to T. Shields and provide authority supporting stay of CA proceedings against L. Jeffrey;	0.90	432.23
08/23/22	Cynthia L. Ney	Compilation and forwarding of documents regarding Beasley's South Lake Tahoe property to A.Deering and J.McGraw.	0.20	35.00
08/24/22	Kara B. Hendricks	Attention to email and documents from D. Cluckey regarding S. Johnson assets, living expenses and proposed stipulation and follow-up with G. Winkler regarding same;	0.20	96.05
08/24/22	Kara B. Hendricks	Revise draft Humphries stipulation (.6); follow-up with G. Winkler regarding proposed asset recovery plan and enforcing same(.2);	0.80	384.20
08/24/22	Kara B. Hendricks	Prepare introduction section and factual background for omnibus response to Dean motions seeking to retain funds provided by Judd including research and analysis regarding fees Judd provided to other counsel and turnover of same;	3.60	1,728.90
08/24/22	Kara B. Hendricks	Correspond with J. DelCastillo regarding his discussion with counsel and funds believed to have been provided to counsel by defendant Judd;	0.10	48.03
08/24/22	Kara B. Hendricks	Attention to correspondence relating to Grand Desert Behavioral and offer to purchase Jager and Madsen interest	0.10	48.03
08/24/22	Kara B. Hendricks	Respond to email from C. Perkins regarding funds provided by Madsen and	0.10	48.03

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Description of Professional Services Rendered

08/24/22	Kara B. Hendricks	schedule call to discuss same; Review emails from P. Johnston with requested Humphreys documents and email regarding stipulation for living expenses and follow-up with G. Winkler (.8); Respond to P. Johnston email with information regarding Huntington Beach house and request immediate turnover of keys (.1); Send additional correspondence to P. Johnston requesting bank statements and loan documents (.2);	1.10	528.28
08/24/22	Kara B. Hendricks	Correspond with G. Winkler regarding Seybert sale request and review prior email discussion regarding same for clarification on status and funds coming to receiver;	0.10	48.03
08/24/22	Christian Spaulding	Draft Omnibus Opposition to four motions filed by Kamille Dean.	9.20	2,932.50
08/24/22	Christian Spaulding	Evaluate relevant case law regarding application of 28 USC 754, personal jurisdiction, and other arguments raised by Kamille Dean in her motions.	3.70	1,179.38
08/25/22	Kara B. Hendricks	Correspond with J. Diraffaele regarding hearing and ability to proceed with Las Vegas property sales;	0.10	48.03
08/25/22	Kara B. Hendricks	Prepare detailed email to P. Johnston address concerns and making recommendations regarding Humphries proposed stipulation;	0.70	336.18
08/25/22	Kara B. Hendricks	Review amended complaint for information regarding defendant J. Jenne in preparation for a call with his counsel to discuss return of assets and next steps (.2); Participate in call with J. Jenne, K. Hogan and G. Winkler to discuss financial information and methods to protect investors;	1.30	624.33
08/25/22	Kara B. Hendricks	Participate in call with C. Fronk and G. Winkler to discuss stipulations proposed on behalf of Defendants S. Johnson and C. Humphries, discuss proposal for sale of assets by D. Seybert, provide update regarding Beasley properties and discuss issues raised by other defendants;	1.30	624.33
08/25/22	Kara B. Hendricks	Telephone call with C. Perkins and D. O'Toole regarding R. Madsen funds(.3); Review prior filings regarding R. Madsen assets (.2); Email update to G. Winkler regarding same (.1);	0.60	288.15
08/25/22	Kara B. Hendricks	Review and revise Omnibus response to Dean motions regarding funds retained from Judd;	4.40	2,113.10
08/25/22	Kara B. Hendricks	Review emails and documents from P. Johnston regarding Humphries living	0.20	96.05

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Description of Professional Services Rendered

		allowance and assets; h		
08/25/22	Kara B. Hendricks	Attention to emails from G. Winkler regarding Jager proposed sale of 16 Paradise Valley and D. Seybert proposal;	0.30	144.08
08/25/22	Kara B. Hendricks	Prepare detailed email to D. Cluckey to address concerns regarding stipulation and proposed changes and next steps;	0.50	240.13
08/25/22	Kara B. Hendricks	Call from D. Cluckey regarding S. Johnson stipulation and documents and information needed;	0.30	144.08
08/25/22	Christian Spaulding	Revise and finalize draft of Omnibus Opposition to Motions filed by Kamille Dean.	4.10	1,306.88
08/26/22	Kara B. Hendricks	Telephone call with G. Winkler to discuss status of Beasley issues including turnover of Ruffian home;	0.10	48.03
08/26/22	Kara B. Hendricks	Prepare email to A. Grisby regarding P. Beasley move from Ruffian house and Mt. Charleston key code;	0.20	96.05
08/26/22	Kara B. Hendricks	Continue review and revisions to response to Dean Motions including follow-up with C. Spaulding regarding same, circulating draft for review, and incorporating comments received;	6.10	2,929.53
08/26/22	Kara B. Hendricks	Review correspondence from D. Cluckey regarding S. Johnson living expenses and assets and follow-up with C. Fronk regarding concerns regarding same;	0.20	96.05
08/26/22	Jason Hicks	Review information concerning purchase of aircraft	0.10	36.12
08/26/22	Cynthia L. Ney	Review and editing of Omnibus motion response, including incorporating Allen Matkins revisions and preparation of supporting exhibits (1.6); communications with K.Hendricks regarding same (.1).	1.70	297.50
08/26/22	Christian Spaulding	Evaluate revisions to Opposition to Kamille Dean motions from J. del Castillo including review of SEC v. Ross and its application to this case.	1.00	318.75
08/26/22	Christian Spaulding	Confer with K. Hendricks regarding the Ninth Circuit's holding in SEC v. Ross and its application to this case and the motions filed by Kamille Dean.	0.30	95.63
08/26/22	Christian Spaulding	Confer with K. Hendricks regarding application of SEC v. Ross to the instant dispute with Kamille Dean regarding summary v. plenary proceedings.	0.40	127.50
08/27/22	Kara B. Hendricks	Review emails and follow-up with C. Spaulding regarding requested revisions to Dean response;	0.10	48.03
08/28/22	Christian Spaulding	Proofread and revise omnibus response to Kamille Dean Motions per comments from co-counsel and client.	0.90	286.88

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Description of Professional Services Rendered

Date	Professional	Description of Services	Hours	Amount
08/29/22	Kara B. Hendricks	Attention to revised stipulation regarding W. Rosegreen and Triple Threat Stipulation and follow-up with G. Winkler regarding concerns therein (.4); Prepare response email to L. Maningo regarding same (.2);	0.60	288.15
08/29/22	Kara B. Hendricks	Attention to listing agreement and addendum for Heber City property and provide input and proposed revisions to J. McGraw;	0.40	192.10
08/29/22	Kara B. Hendricks	Review receiver report and recommendation re liquidation and follow-up with J. del Castillo regarding same;	0.20	96.05
08/29/22	Kara B. Hendricks	Update and finalize response to Dean Motions and notice of non-opposition to Dean Motion to Compel;	0.80	384.20
08/29/22	Kara B. Hendricks	Correspond with D. Clukey regarding S. Johnson living expenses and proposed stipulation relating to current assets (.1); telephone call with D. Clukey to discuss his concerns regarding same (.2); Follow-up with G. Winkler regarding issues raised by D. Clukey and discuss path to resolve (.3); Group call with D. Clukey, C. Fronk and G. Winkler to work through stipulation concerns (.2); Review revised stipulation regarding same and provide comments (.3);	1.10	528.28
08/29/22	Kara B. Hendricks	Attention to information provided regarding Calle Francesca sale documents and anticipated funds to estate;	0.20	96.05
08/29/22	Cynthia L. Ney	Download, review and electronic organization of additional M.Murphy documentation (.4); communications with K.Hendricks regarding same (.1).	0.50	87.50
08/30/22	Kara B. Hendricks	Follow-up with via email and phone call with G. Winkler regarding efforts to recover keys for Beasley and Judd properties;	0.20	96.05
08/30/22	Kara B. Hendricks	Follow-up with P. Johnston regarding turnover of keys for Humphries Huntington Beach house(.1); Attention to correspondence from P. Johnston and forward information regarding access to house and turnover of vehicles to G. Winkler and discuss next steps (.4);	0.40	192.10
08/30/22	Kara B. Hendricks	Participate in call with G. Winkler, J. Hall, J.McGraw, K. Andrassy and Texas counsel and receive updates regarding Texas asset recovery efforts, status of property sale in Search Light, other recover efforts and prioritize next steps;	0.70	336.18
08/30/22	Kara B. Hendricks	Revise draft Humphries stipulation and circulate proposed changes to C. Fronk and	0.70	336.18

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Description of Professional Services Rendered

08/30/22	Kara B. Hendricks	G. Winkler (.6); Forward proposed revisions to stipulation to P. Johnston (.1); Follow-up with G. Winkler regarding S. Johnson stipulation and recovery number;	0.10	48.03
08/30/22	Kara B. Hendricks	Attention to emails from D. Cluckey regarding stipulation regarding S. Johnson assets and living expenses, finalize stipulation and request P. January file same;	0.20	96.05
08/30/22	Kara B. Hendricks	Attention to SEC response to Dean motion for leave to file interpleader;	0.10	48.03
08/30/22	Kara B. Hendricks	Correspond with P. Johnston regarding receiver's arrangements to pick-up keys to Huntington Beach House and pick-up vehicles;	0.10	48.03
08/31/22	Kara B. Hendricks	Attention to Receiver team task list and review information regarding recent activities to update team (.2); Participate in call with receivership team including G. Winkler, A. Deering, J. McGraw, J. del Castillo, and M. Pham and provide asset recover updates, discuss next steps and division of work to avoid duplicative efforts (1.0);	1.20	576.30
08/31/22	Kara B. Hendricks	Attention to email from P. Johnston regarding finalizing stipulation for Humphries living expenses and follow-up with C. Fronk regarding same (.3); Review analysis of documents provided by P. Johnston regarding vehicles turnover to confirm stipulation is accurate and required documents provided (.5); Finalize stipulation (.2);	1.00	480.25
08/31/22	Kara B. Hendricks	Attention to communication regarding missed mortgage payments for Humphries Huntington Beach house including follow-up telephone call with G. Winkler (.3); Email Humphries counsel requesting information regarding mortgage prior to finalize stipulation (.1);	0.40	192.10
08/31/22	Kara B. Hendricks	Telephone call from N. Lovelock regarding Kamille Dean representation and filing of motions (.2); Update G. Winkler and get input regarding next steps (.2); Second call with N. Lovelock (.1); Email C. Fronk and T. Combs regarding same (.1);	0.60	288.15
			<hr/>	
			Total Hours:	200.50
			Total Amount:	\$ 79,025.18

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Description of Professional Services RenderedTIMEKEEPER SUMMARY FOR TASK CODE GW001,

ASSET ANALYSIS AND RECOVERY

Summary of Fees (Standard Rates)

<u>Timekeeper Name</u>	<u>Hours Billed</u>	<u>Standard Rate</u>	<u>Total \$ Amount</u>
Mark E. Ferrario	0.30	725.00	217.50
Kara B. Hendricks	105.00	565.00	59,325.00
Jason Hicks	5.00	425.00	2,125.00
Kyle Ewing	0.20	400.00	80.00
Christian Spaulding	65.70	375.00	24,637.50
Akke Levin	4.60	550.00	2,530.00
Cynthia L. Ney	19.70	295.00	5,811.50
Totals:	200.50		\$ 94,726.50

Summary of Fees (Discounted Rates)

<u>Timekeeper Name</u>	<u>Hours Billed</u>	<u>Average Discounted Rate</u>	<u>Total \$ Amount</u>
Mark E. Ferrario	0.30	616.27	184.88
Kara B. Hendricks	105.00	480.25	50,426.17
Jason Hicks	5.00	361.25	1,806.25
Kyle Ewing	0.20	340.00	68.00
Christian Spaulding	65.70	318.75	20,941.88
Akke Levin	4.60	467.50	2,150.50
Cynthia L. Ney	19.70	175.00	3,447.50
Totals:	200.50		\$ 79,025.18

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Description of Professional Services Rendered

TASK CODE: GW004 CASE ADMINISTRATION

<u>DATE</u>	<u>TIMEKEEPER</u>	<u>DESCRIPTION</u>	<u>HOURS</u>	<u>AMOUNT</u>
08/01/22	Kara B. Hendricks	Prepare proposed order for approval of report and request for instructions and work with E. Escobar-Gaddi to finalize report and exhibits for filing;	0.60	288.15
08/01/22	Kara B. Hendricks	Correspond with T. Combs regarding filing of status report;	0.10	48.03
08/02/22	Cynthia L. Ney	Electronic case organization.	0.40	70.00
08/02/22	Cynthia L. Ney	Review recent email communications.	0.20	35.00
08/05/22	Kara B. Hendricks	Review correspondence from J. Rickard to coordinate upcoming filings;	0.10	48.03
08/05/22	Kara B. Hendricks	Attention to court order regarding bankruptcy issues and next steps to effectuate the same;	0.10	48.03
08/09/22	Kara B. Hendricks	Attention to media inquiry regarding recently ruling and forward to G. Winkler for consideration;	0.10	48.03
08/10/22	Kara B. Hendricks	Correspond with G. Winkler regarding additional professionals needed to assist receiver and applicable motion to employ;	0.10	48.03
08/12/22	Kara B. Hendricks	Correspond with C. Ney regarding team task list and updating same to avoid duplicate efforts.	0.10	48.03
08/16/22	Kara B. Hendricks	Call with G. Winkler and Allen Matkins team to address K. Dean motions strategize regarding response to same;	0.70	336.18
08/17/22	Cynthia L. Ney	Electronic case organization to assist attorneys in locating documents and information.	0.50	87.50
08/18/22	Kara B. Hendricks	Attention to mechanics lien summary and information from Lithion Battery and follow-up with G. Winkler regarding next steps;	0.20	96.05
08/18/22	Kara B. Hendricks	Finalize motion to employ and correspond with C. Ney regarding exhibits;	0.60	288.15
08/18/22	Cynthia L. Ney	Download, review and organization of S.Jager materials forwarded (.7); communications with K.Hendricks regarding same (.1).	0.80	140.00
08/19/22	Kara B. Hendricks	Review bankruptcy filings including motion to withdraw reference and judge assignment to assess next steps;	0.20	96.05
08/22/22	Kara B. Hendricks	Review email from R. Goodman regarding notice of intent to default in CA against Jeffery and respond to same (.1); Update G. Winkler (.1);	0.20	96.05
08/23/22	Kara B. Hendricks	Respond to email from J. Jongeward regarding record request and difficulties	0.20	96.05

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Description of Professional Services Rendered

08/23/22	Kara B. Hendricks	obtain necessary documents and follow-up with T. Ericson regarding same; Follow-up with C. Spaulding regarding Dean response and arguments to pending motions filed to keep funds and file new action;	0.20	96.05
08/23/22	Kara B. Hendricks	Follow-up with C. Rhoades to obtain video and chat information from investor meeting;	0.10	48.03
08/24/22	Kara B. Hendricks	Review order granting motion to withdraw bankruptcy reference and follow-up with M Pham regarding next steps and potential attendance at scheduled bankruptcy status hearing;	0.20	96.05
08/24/22	Kara B. Hendricks	Correspond with T. Combs and C. Fronk regarding defendant living expense stipulations and schedule call to discuss Humphries, S. Johnson stipulations and related issues	0.10	48.03
08/24/22	Cynthia L. Ney	Electronic case organization of C.Humphries documentation.	0.40	70.00
08/26/22	Kara B. Hendricks	Review correspondence from K. Hogan regarding J. Jenne records and follow-up with G. Winkler regarding same;	0.10	48.03
08/26/22	Kara B. Hendricks	Prepare notice of non opposition to K. Dean motion to compel;	0.30	144.08
08/30/22	Kara B. Hendricks	Correspond with J. Rickard regarding extension request he received on behalf of K. Dean;	0.10	48.03
08/31/22	Kara B. Hendricks	Attention to emails regarding Dean extension request and provide J. Rickard directive from G. Winkler regarding same (.2); Telephone call from J. Rickard regarding communication with K. Dean proposed counsel (.1);	0.30	144.08
08/31/22	Kara B. Hendricks	Initial review of motion to intervene and discussion with G. Winkler regarding same (.4); Correspond with C. Fronk regarding call to discuss (.1); Conference call with C. Fronk, T. Combs and G. Winkler regarding motion and response (.5); Outline issues addressed in call and follow-up with J. del Castro to discuss next steps including division of work to avoid duplicative efforts (.2);	1.20	576.30

Total Hours: 8.20

Total Amount: \$ 3,236.04

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Description of Professional Services RenderedTIMEKEEPER SUMMARY FOR TASK CODE GW004,

CASE ADMINISTRATION

Summary of Fees (Standard Rates)

<u>Timekeeper Name</u>	<u>Hours Billed</u>	<u>Standard Rate</u>	<u>Total \$ Amount</u>
Kara B. Hendricks	5.90	565.00	3,333.50
Cynthia L. Ney	2.30	295.00	678.50
Totals:	8.20		\$ 4,012.00

Summary of Fees (Discounted Rates)

<u>Timekeeper Name</u>	<u>Hours Billed</u>	<u>Average Discounted Rate</u>	<u>Total \$ Amount</u>
Kara B. Hendricks	5.90	480.26	2,833.54
Cynthia L. Ney	2.30	175.00	402.50
Totals:	8.20		\$ 3,236.04

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Description of Professional Services Rendered

TASK CODE: GW005 CLAIMS ADMINISTRATION AND OBJECTIONS

<u>DATE</u>	<u>TIMEKEEPER</u>	<u>DESCRIPTION</u>	<u>HOURS</u>	<u>AMOUNT</u>
08/16/22	Kara B. Hendricks	Attention to logistics associated with upcoming investor meeting including working with C. Rhoades on IT issues, coordinating with GT admin team, and correspondence with A. Deering to facilitate same;	0.80	384.20
08/19/22	Kara B. Hendricks	Review compiled information regarding investors questions, meeting attendees and script;	0.30	144.08
08/22/22	Kara B. Hendricks	Attend investor meeting and participate in discussion following same that included investors to further obtain information and answer questions regarding process moving forward;	1.80	864.45
08/22/22	Kara B. Hendricks	Follow-up with C. Rhoades regarding investor meeting technology requirements and work with front office staff to facilitate same;	0.50	240.13
Total Hours:			3.40	
Total Amount:				\$ 1,632.86

TIMEKEEPER SUMMARY FOR TASK CODE GW005,

CLAIMS ADMINISTRATION AND OBJECTIONS

Summary of Fees (Standard Rates)

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

Summary of Fees (Discounted Rates)

<u>Timekeeper Name</u>	<u>Hours Billed</u>	<u>Average Discounted Rate</u>	<u>Total \$ Amount</u>
Kara B. Hendricks	3.40	480.25	1,632.86
Totals:	3.40		\$ 1,632.86

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Description of Professional Services Rendered

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Description of Professional Services Rendered**TIMEKEEPER ACTIVITY GRAND TOTAL SUMMARY****Summary of Fees (Standard Rates)**

<u>Timekeeper</u>	<u>Hours</u>	<u>Rate</u>	<u>Amount</u>
Mark E. Ferrario	0.30	725.00	217.50
Kara B. Hendricks	114.30	565.00	64,579.50
Jason Hicks	5.00	425.00	2,125.00
Kyle Ewing	0.20	400.00	80.00
Christian Spaulding	65.70	375.00	24,637.50
Akke Levin	4.60	550.00	2,530.00
Cynthia L. Ney	22.00	295.00	6,490.00
Totals:	212.10		\$ 102,580.50

Summary of Fees (Discounted Rates)

<u>Timekeeper</u>	<u>Hours</u>	<u>Rate</u>	<u>Amount</u>
Mark E. Ferrario	0.30	616.27	184.88
Kara B. Hendricks	114.30	480.25	54,892.57
Jason Hicks	5.00	361.25	1,806.25
Kyle Ewing	0.20	340.00	68.00
Christian Spaulding	65.70	318.75	20,941.88
Akke Levin	4.60	467.50	2,150.50
Cynthia L. Ney	22.00	175.00	3,850.00
Totals:	212.10		\$ 83,894.08

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

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Description of Expenses Billed:

<u>DATE</u>	<u>DESCRIPTION</u>		<u>AMOUNT</u>
06/27/22	Lexis Charges: 06/27/22 SEARCH Requested by Spaulding, Christian Ref: 209375.010100	\$	79.20
06/28/22	Lexis Charges: 06/28/22 SEARCH Requested by Spaulding, Christian Ref: 209375.010100	\$	39.60
07/14/22	Lexis Charges: 07/14/22 SEARCH Requested by Spaulding, Christian Ref: 209375.010100	\$	39.60
07/19/22	Lexis Charges: 07/19/22 SEARCH Requested by Spaulding, Christian Ref: 209375.010100	\$	19.80
07/20/22	Lexis Charges: 07/20/22 SEARCH Requested by Hicks, Jason Ref: 209375.010100	\$	19.80
07/21/22	Lexis Charges: 07/21/22 SEARCH Requested by Spaulding, Christian Ref: 209375.010100	\$	59.40
07/27/22	Lexis Charges: 07/27/22 SEARCH Requested by Spaulding, Christian Ref: 209375.010100	\$	39.60
07/28/22	Lexis Charges: 07/28/22 SEARCH Requested by Spaulding, Christian Ref: 209375.010100	\$	19.80
	Total Expenses:	\$	316.80



Invoice No.: 1000142507
File No. : 209375.010100
Bill Date : November 9, 2022

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

Attn: Geoff Winkler

INVOICE

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

THIS INVOICE REPLACES 1000106463

Total Fees: \$ 43,547.26

Expenses:

Subpoenas 495.00
Information and Research 457.20

Total Expenses: \$ 952.20

Current Invoice: \$ 44,499.46

Previous Balance (see attached statement): \$ 77,629.70

Total Amount Due: \$ 122,129.16

KBH:LC
Tax ID: 13-3613083



Invoice No.: 1000142507
File No.: 209375.010100

REMITTANCE ADVICE

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

CLIENT NAME: WINKLER, GEOFF
FILE NUMBER: 209375.010100
INVOICE NUMBER: 1000142507*
BILLING PROFESSIONAL: Kara B. Hendricks

Current Invoice:	\$	44,499.46
Previous Balance:	\$	77,629.70
Total Amount Due:	\$	122,129.16

FOR YOUR CONVENIENCE, WIRE TRANSFER FUNDS TO:

For Wire Instructions:

Bank: WELLS FARGO BANK
ABA #: 121000248

For ACH Instructions:

Bank: WELLS FARGO BANK
ABA#: 063107513

CREDIT TO: GREENBERG TRAURIG DEPOSITORY ACCOUNT
ACCOUNT #: 2000014648663

PLEASE

REFERENCE: CLIENT NAME: WINKLER, GEOFF
FILE NUMBER: 209375.010100
INVOICE NUMBER: 1000142507*
BILLING
PROFESSIONAL: Kara B. Hendricks

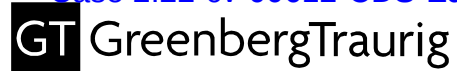
IF YOU WISH TO PAY BY CHECK PLEASE REMIT TO THE ADDRESS BELOW:

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

Wire fees may be assessed by your bank.

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

KBH:LC
Tax ID: 13-3613083



Invoice No. : 1000142507
File No. : 209375.010100

KBH:LC
Tax ID: 13-3613083



Invoice No. : 1000142507
File No. : 209375.010100

Account Statement

<u>Date</u>	<u>Invoice #</u>	<u>Fees Due</u>	<u>Expenses Due</u>	<u>Other Due</u>	<u>Total Due</u>
07/19/22	1000035547	16,627.52	0.00	0.00	16,627.52
10/03/22	1000096060	60,998.18	4.00	0.00	61,002.18
	Totals:	\$ 77,625.70	\$ 4.00	\$ 0.00	\$ 77,629.70

KBH:LC

Tax ID: 13-3613083

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TASK CODE: GW001 ASSET ANALYSIS AND RECOVERY

<u>DATE</u>	<u>TIMEKEEPER</u>	<u>DESCRIPTION</u>	<u>HOURS</u>	<u>AMOUNT</u>
07/25/22	Jason Hicks	Further review of briefing for purposes of today's hearing; attend omnibus hearing and debrief with receiver and receivership team/formulate plan regarding next steps.	1.00	361.25
09/01/22	Kara B. Hendricks	Correspond with K. Works regarding Humphries turnover and stipulation and concerns regarding mortgage payments.	0.40	192.10
09/01/22	Kara B. Hendricks	Respond to email from M. Cavanaugh regarding ECO BAT purchase discussions and information the receiver is waiting to obtain to further evaluate.	0.10	48.03
09/01/22	Kara B. Hendricks	Prepare letter to counsel of original defendants regarding retainer agreements, source of funds and potential turnover (.8); Prepare letter to counsel for new defendants regarding same (.5).	1.30	624.33
09/01/22	Kara B. Hendricks	Follow-up with L. Maningo regarding Seybert asset purchase agreement and proposed sale of condo and request additional information and clarification regarding sale proceeds going to the Receiver (.3); Respond to inquiries from L. Maningo regarding same (.1); Follow-up with G. Winkler regarding same (.1).	0.50	240.13
09/01/22	Kara B. Hendricks	Request C. Ney's assistance with review of letter templates and obtaining contact information for counsel for original defendants and new defendants and sending correspondence to each regarding funds received from defendants and turnover of same.	0.30	144.08
09/01/22	Cynthia L. Ney	Review court docket and work with K. Hendricks to track defendants and counsel.	1.20	210.00
09/01/22	Cynthia L. Ney	Review and revise form letters to defendant's counsel regarding retainers and submission of those funds to Receiver (.2); communications with K.Hendricks regarding same (.1).	0.30	52.50
09/02/22	Kara B. Hendricks	Attention to emails from K. Works and P. Johnston regarding Humphries living expenses and stipulation (.2); Telephone call with K. Works and P. Johnston regarding same (.3); Update G. Winkler (.2); Telephone call with C. Fronk, T. Combs and G. Winkler regarding discussions with counsel re: Humphries	1.10	528.28

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		and next steps (.4).		
09/02/22	Kara B. Hendricks	Review correspondence from J. Jongeward regarding documents from FBI and follow-up with G. Winkler.	0.10	48.03
09/06/22	Kyle Ewing	Prepare and attend weekly meeting with G. Winkler and AFS team, J. delCastillo and AM team and follow-up with K. Hendricks.	0.80	272.00
09/06/22	Christian Spaulding	Confer with K. Hendricks regarding language contained within local rules governing Receivers.	0.30	95.63
09/07/22	Kara B. Hendricks	Email P. Johnston regarding Humphries living expense stipulation and potential set off for Huntington Beach house mortgage payments (2); Return phone call to P. Johnston to discuss same (.1).	0.30	144.08
09/07/22	Kara B. Hendricks	Respond to email from J. Jongeward regarding living expense and asset issues(.2); Forward new information provided to G. Winkler regarding the same (.1).	0.30	144.08
09/07/22	Kara B. Hendricks	Review and revise response to motion to intervene and provide comments to J. delCastro regarding same.	0.80	384.20
09/07/22	Kara B. Hendricks	Attention to email from M. Cavanaugh regarding ECO Bat evaluation.	0.10	48.03
09/08/22	Kara B. Hendricks	Attention to emails with P. Johnston regarding titles to vehicles and follow-up with G. Winkler.	0.10	48.03
09/08/22	Kara B. Hendricks	Attention to multiple emails from P. Johnston regarding Hurricane house, tenants and turnover to the Receiver (.2); Update G. Winkler and A. Deering regarding same (.1).	0.30	144.08
09/08/22	Kara B. Hendricks	Attention to proposed Nevada listing agreement, update addendum, and communicate with A. Deering and J. DiRaffaele regarding same.	0.40	192.10
09/08/22	Kara B. Hendricks	Respond to email from K. Hyson regarding K. Dean funds and pending motion and telephone call to discuss same (.2).	0.20	96.05
09/08/22	Kara B. Hendricks	Follow-up with D. Zaro regarding mortgage analysis given asset freeze and 754 filings.	0.10	48.03
09/08/22	Kara B. Hendricks	Revise list of defense counsel and update regarding information provided regarding attorney fees provided by defendants (.4); Circulate draft letter and list of recipients to J. Winkler and J. delCastillo for review (.1).	0.50	240.13
09/08/22	Kara B. Hendricks	Telephone call from P. Johnston regarding Humphries stipulation and resolution of living expense issue.	0.30	144.08

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09/08/22	Cynthia L. Ney	Attention to C.Humphries records per K. Hendricks request.	0.30	52.50
09/08/22	Cynthia L. Ney	Download, review and electronic organization of Larry Jeffrey financial documentation (.6); communications with K.Hendricks regarding same (.1).	0.70	122.50
09/09/22	Kara B. Hendricks	Attention to emails from L. Crofton regarding listing agreements for Nevada properties including 9 Sky Arc, 5475 Ruffian, 2143 Via Regina, 8 Twisted Rock 29 Rockstream.	0.40	192.10
09/09/22	Kara B. Hendricks	Revise stipulation regarding Humphries living expenses and follow-up with G. Winkler and C. Fronk regarding same.	0.40	192.10
09/09/22	Kara B. Hendricks	Attention to emails with G. Winkler and counsel for Humphries regarding vehicles titles and information seized by FBI.	0.10	48.03
09/09/22	Kara B. Hendricks	Respond to email from J. DiRaffaele regarding addendum to listing agreement regarding receivership issues.	0.10	48.03
09/09/22	Kara B. Hendricks	Review letters regarding attorney fees to counsel for ACAC, R. Tanner, D. Seybert, S. Jager and follow-up with C. Ney to finalize same.	0.30	144.08
09/09/22	Kara B. Hendricks	Update template letter to send to multiple counsel with fee request and incorporate G. Winkler comments (.2); Work with C. Ney to update and prepare to send letters to counsel for new defendants including C. Rhoner, M. Murphey, C. Madsen, S. Johnson, J. Jenne, L. Jeffries and R. Madsen (.4).	0.60	288.15
09/09/22	Jason Hicks	Review SEC's response to Kamille Dean (Judd atty) motion for leave to file interpleader (ECF No 278).	0.10	36.12
09/09/22	Jason Hicks	Review Kamille Dean (Judd atty) reply in support of her motion for leave to file an interpleader action (ECF No 297).	0.10	36.12
09/09/22	Jason Hicks	Review non-party Bitcoin's certified statement per receivership order (ECF No. 291).	0.10	36.12
09/09/22	Jason Hicks	Review order on Seth Johnson's living expenses (ECF No 280).	0.10	36.12
09/09/22	Jason Hicks	Review omnibus brief in opposition to the various Kamille Dean (Judd) motions.	0.50	180.62
09/09/22	Jason Hicks	Review Kamille Dean (Judd atty) reply to motion to strike re order to show cause for contempt of turnover order (ECF No 296).	0.20	72.25
09/09/22	Jason Hicks	Review court's order approving first quarterly status report and petition for further instructions by receiver (ECF no 298).	0.10	36.12
09/09/22	Jason Hicks	Review Kamille Dean (Judd atty) reply to	0.30	108.37

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		motion to quash jurisdiction and exhibits (ECF No 295).		
09/09/22	Jason Hicks	Review motion to intervene by proposed plaintiffs Omid Shahabe and Kristie Young and their proposed complaint in intervention (ECF No 281).	0.60	216.75
09/09/22	Jason Hicks	Review court's minute order regarding ex parte motion for order suspending claims bar dates.	0.10	36.12
09/09/22	Jason Hicks	Review correspondence concerning offer and sale of the private airplane.	0.10	36.12
09/09/22	Cynthia L. Ney	Preparation of letters to various counsel regarding attorney funds received from defendants (1.1); finalize letters and individual service of same upon counsel (.6); communications with K.Hendricks regarding same (.2).	1.90	332.50
09/12/22	Kara B. Hendricks	Correspond via email with P. Johnston regarding Humphries keys to Hurricane house and living expense stipulation.	0.10	48.03
09/12/22	Kara B. Hendricks	Attention to email from R. Reed regarding Lithon Battery lien on Judd property and payment and follow-up with G. Winkler regarding next steps.	0.20	96.05
09/12/22	Kara B. Hendricks	Review and analysis of reply briefs filed on behalf of K. Dean (Reply in support of motion to quash, Reply in support of motion to strike, Reply in support of motion to file interpleader action) and follow-up with C. Spaulding regarding case law referenced.	0.70	336.18
09/12/22	Kara B. Hendricks	Review listing agreements for Ruffian and Stephan vacant lots and follow-up with A. Deering regarding same.	0.20	96.05
09/12/22	Jason Hicks	Review opposition to motion to intervene (ecf 300).	0.40	144.55
09/12/22	Cynthia L. Ney	Review various filed pleadings and email communications.	0.30	52.50
09/12/22	Christian Spaulding	Evaluate reply briefs filed by K. Dean and evaluate relevant case law to determine veracity of arguments made therein.	4.50	1,434.38
09/13/22	Kyle Ewing	Conference with K. Hendricks re: the receiver's discovery that P. Beasley sold her Mercedes G Wagon as a discount in derogation of the asset freeze and receivership orders; strategize re: options for halting any sale and otherwise protecting the estate's interest in the vehicle.	0.80	272.00
09/13/22	Kyle Ewing	Conference with AFS (A. Deering and J. McGraw) and Allen Matkins (J. DelCastillo, D. Zaro, and M. Pham) re: status of various efforts to liquidate assets	0.90	306.00

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		marshaled to date and recover further assets, including listing real property for sales and recent identification of the locations of several luxury vehicles.		
09/13/22	Kara B. Hendricks	Correspond with A. Deering via email regarding GCBH offer.	0.10	48.03
09/13/22	Kara B. Hendricks	Review information from B. Tanquillo regarding vehicles on asset list in possession of third parties.	0.20	96.05
09/13/22	Kara B. Hendricks	Participate in conference with A. Deering, J. Hall, J. McCraw, and Allen Matkins team to discuss recent case developments, asset recover efforts, intended next steps and division of work.	1.20	576.30
09/13/22	Kara B. Hendricks	Telephone call from G. Winkler regarding asset list from FBI and motion for turnover of items seized.	0.20	96.05
09/13/22	Kara B. Hendricks	Prepare agreement and release relating to Lithion Battery Lien on Sky Arc property (.7); Correspond via email with R. Reed regarding next steps (.1).	0.80	384.20
09/13/22	Kara B. Hendricks	Correspond via email with C. Fronk regarding Humphries stipulation (.1); Forward revised stipulation to P. Johnston for consideration (.1); Telephone call from P. Johnston to discuss same (.1); Follow-up via email to finalize stipulation and obtain consent to file with e-signatures (.3).	0.60	288.15
09/13/22	Kara B. Hendricks	Respond to email from D. Huish and schedule time to discuss R. Tanner compliance with SEC order.	0.10	48.03
09/13/22	Kara B. Hendricks	Review analysis from C. Spaulding regarding cases discussed in reply briefs filed by K. Dean to understand potential impact of same.	0.20	96.05
09/13/22	Kara B. Hendricks	Prepare correspondence to Vegas Valley Auto regarding G-Wagon and advising of receivership order and asset freeze.	0.70	336.18
09/13/22	Kara B. Hendricks	Review federal rules regarding subpoenas and follow-up with K. Ewing regarding newly identified issues relating to vehicles in posses of third parties and ability to obtain additional information regarding same.	0.50	240.13
09/13/22	Kara B. Hendricks	Telephone call with J. deCastillo regarding information regarding vehicles on asset list and third party dealers.	0.30	143.60
09/13/22	Kara B. Hendricks	Request C. Spaulding's assistance with preparation of subpoena for information regarding G-Wagon on Beasley asset list at dealership and correspond via email regarding issues arising from lack of title and C. Spaulding's research regarding	0.30	144.08

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		same.		
09/13/22	Kara B. Hendricks	Review correspondence to G. Ogata and A. Grisby regarding funds received for attorney representation.	0.10	48.03
09/13/22	Kara B. Hendricks	Review notice of compliance of report requirements for R. Madsen and email with attached documents (.1); Request C. Ney assistance with downloading information provided (.1).	0.20	96.05
09/13/22	Kara B. Hendricks	Correspond with G. Winkler regarding new information regarding G-Wagon identified on Beasley asset list (.3); Telephone call (x2) with B. Tranquillo regarding same (.4); Brainstorm regarding options to prevent sale of vehicle with K. Ewing (.2).	0.90	432.23
09/13/22	Kara B. Hendricks	Telephone call from P. Johnston regarding Humphries stipulation.	0.10	48.03
09/13/22	Kara B. Hendricks	Respond to email from L. Maningo regarding information requested regarding Seybert deal and fee information request.	0.10	48.03
09/13/22	Kara B. Hendricks	Revise correspondence to L. Maningo regarding funds relieved from D. Seybert, Rocking Horse Properties, Triple Threat Basket Ball and W. Rosegreen.	0.30	144.08
09/13/22	Kara B. Hendricks	Review materials provided by Draskovich firm regarding Beasley fees and follow-up with G. Winkler.	0.10	48.03
09/13/22	Kara B. Hendricks	Correspond via email with G. Winkler regarding Judd condo in the Bahamas and purported default.	0.10	48.03
09/13/22	Jason Hicks	Review SEC's opposition to motion to intervene (ECF No 303).	0.40	144.50
09/13/22	Cynthia L. Ney	Prepare and forward letters to various attorneys for defendants regarding funds received from defendants (.7); communications with K.Hendricks regarding same (.1).	0.80	140.00
09/13/22	Christian Spaulding	Evaluate vehicle asset list and draft subpoena to Vegas Auto Gallery regarding G-Wagon offered for sale.	1.10	350.63
09/13/22	Christian Spaulding	Evaluate Nevada authority regarding sale of vehicle without title, process for obtaining new title and rights related thereto.	1.60	510.00
09/13/22	Christian Spaulding	Continue evaluation of cases cited in Dean Reply briefs and draft summary of arguments to be made in opposition thereto.	1.60	510.00
09/13/22	Christian Spaulding	Search for additional vehicles potentially being sold or otherwise disposed of from list of identified assets of Judd, Beasley, and Humphries. Confer with K. Hendricks regarding Judd Bentley in Florida and	1.10	350.63

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09/14/22	Kyle Ewing	Range Rover in Henderson. Review/analyze bankruptcy appeal pleadings.	0.20	68.00
09/14/22	Kara B. Hendricks	Review emails and follow-up with G. Winkler regarding outstanding issues with counsel regarding fees and asset recovery questions.	0.50	240.13
09/14/22	Kara B. Hendricks	Discuss subpoena to auto dealership with C. Spaulding (.1); Telephone call to J. Richard to discuss subpoena related issues (.1).	0.20	96.05
09/14/22	Kara B. Hendricks	Telephone call with D. Huish regarding R. Tanner documents and property and turnover and update G. Winkler.	0.70	336.18
09/14/22	Kara B. Hendricks	Attention to email from C. Fronk, K. Works, and T. Carlucci regarding approval and filing of Humphries living expense/asset stipulation (.1); Work with P. January to finalize same (.1).	0.20	96.05
09/14/22	Kara B. Hendricks	Call to S. Mirkovich regarding anticipated subpoenas(.2); Forward information to team members involved in preparation of same (.1).	0.30	144.08
09/14/22	Kara B. Hendricks	Telephone call with Blake from Vegas Auto Gallery regarding G-Wagon and discussion regarding next steps.	0.20	96.05
09/14/22	Kara B. Hendricks	Review email from T. Combs regarding request from counsel for additional to reply to motion to intervene (.1); Telephone call with B. Urga regarding same (.1).	0.20	96.05
09/14/22	Kara B. Hendricks	Review and revise subpoena to Vegas Auto Gallery (.2); Request C. Ney's assistance with notice of subpoena and identifying emails for service list (.3); Update notice to parties (.3); Email C. Fronk and T. Combs and provide information regarding subpoena (.2).	1.00	480.25
09/14/22	Kara B. Hendricks	Respond to mail from K. Hogan re: Jenne and correspondence regarding records.	0.10	48.03
09/14/22	Kara B. Hendricks	Correspond with B. Tranquillo via email regarding G-Wagon and other vehicles identified on receiver asset list.	0.20	96.05
09/14/22	Kara B. Hendricks	Finalize correspondence to Vegas Valley regarding G-Wagon.	0.20	96.05
09/14/22	Cynthia L. Ney	Preparation of Notice of Subpoena directed to Vegas Auto Gallery regarding P.Beasley vehicle (.3); prepare chart of parties/counsel email for receipt of Notice of Subpoena (.6); finalize notice and Subpoena and service upon parties/counsel (.3); service via email of subpoena to Vegas Auto Gallery (.1); arrangements for process server to serve subpoena upon	1.70	297.50

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		Vegas Auto Gallery (.2); communications with K.Hendricks regarding same (.2).		
09/14/22	Christian Spaulding	Revise and Finalize Subpoena and Exhibit thereto regarding Beasley G-Wagon offered for Sale at Vegas Auto Gallery.	1.10	350.63
09/15/22	Jason Hicks	Review withdrawals of BK filed by German Turner firm.	0.10	36.12
09/16/22	Kara B. Hendricks	Respond to email from C. Spaulding regarding turnover motion and information provide to G. Winkler from US attorney and follow-up with G. Winkler for further clarification.	0.20	96.05
09/16/22	Christian Spaulding	Evaluate correspondence from Mark Cook, counsel for Mark Murphy, regarding Receiver's request for documents.	0.20	63.75
09/17/22	Kyle Ewing	Email/verbal communication with K. Hendricks (GT) and receiver (G. Winkler) re: filing of motion to compel turnover of certain valuable receivership assets (gold and cash) based on Winkler's conversations with AUSA D. Schiess (0.2); email communication with G. Winkler (AFS) and co-counsel J. DelCastillo (Allen Matkins) re: potential buyer's of 9 Sky Arc's request for return of earnest money funds (0.1).	0.30	102.00
09/17/22	Kyle Ewing	Research law in connection with the receiver's motion to compel turnover of certain valuable receivership assets (gold and cash).	0.70	238.00
09/17/22	Kara B. Hendricks	Respond to email regarding US Bank stipulation and turnover of assets.	0.10	48.03
09/17/22	Kara B. Hendricks	Respond to email from G. Winkler regarding D. Seybert and monies at issue.	0.10	48.03
09/17/22	Kara B. Hendricks	Follow-up with D. Zaron and G. Winkler regarding subpoena questions.	0.10	48.03
09/17/22	Christian Spaulding	Revise draft of Motion for Turnover of Property Held by FBI.	3.40	1,083.75
09/18/22	Christian Spaulding	Finalize draft of Motion for Turnover of Property held by FBI and email to K. Hendricks regarding the same.	0.40	127.50
09/19/22	Kyle Ewing	Review and revise motion for turnover of Judd/Beasley receivership property seized by FBI in connection with obtaining the same.	1.60	544.00
09/19/22	Kara B. Hendricks	Follow-up with R. Reed regarding Lithion Battery funds and arranging for pick-up of same.	0.20	96.05
09/19/22	Kara B. Hendricks	Review and revise turnover motion and request K. Ewing review and incorporate research.	0.30	144.08
09/19/22	Kara B. Hendricks	Request C. Ney assistance tracking responses by counsel regarding funds received from defendants.	0.20	96.05

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09/19/22	Kara B. Hendricks	Participate in call with G. Winkler and M. Levin and his partners regarding GDBH interest and value (.6); Follow-up with G. Winkler regarding same (.2).	0.80	384.20
09/19/22	Kara B. Hendricks	Discuss research in support of motion for turnover with K. Ewing.	0.20	96.05
09/20/22	Kara B. Hendricks	Call to B. Price-Zoom regarding Beasley Mercedes G-Wagon, subpoena, and request for pick-up and follow-up via email and exchange and review related documents.	0.70	336.18
09/20/22	Kara B. Hendricks	Participate in call with G. Winkler, A. Deering, J. Hall, D. Zaro, M. Pham regarding pending matters including asset recovery, property listings, information requested from various defense counsel, anticipated filings, and next steps to prioritize next steps and alleviate duplicative efforts.	0.90	432.23
09/20/22	Kara B. Hendricks	Request C. Spaulding's assistance is preparing letters to mortgage companies regarding and subpoenas regarding vehicles believed to be receivership property and provide background and documents to facilitate the same.	0.60	288.15
09/20/22	Kara B. Hendricks	Telephone call with Blake from Vegas Auto Gallery regarding pick-up of G-Wagon and discussion with A. Nicholas regarding same.	0.30	144.08
09/20/22	Kara B. Hendricks	Review K. Ewing comments on motion for turnover and forward to G. Winkler for review and comment.	0.20	96.05
09/20/22	Cynthia L. Ney	Electronic case organization.	0.20	35.00
09/20/22	Cynthia L. Ney	Compilation of materials regarding default mortgages on Beasley and Humphries properties (.3); communications with K.Hendricks and C.Spaulding regarding same (.1).	0.40	70.00
09/20/22	Christian Spaulding	Communications with team regarding additional receivership property (vehicles) for sale.	0.50	159.38
09/20/22	Christian Spaulding	Evaluate documents in file related to Lake Tahoe property and the note related thereto.	1.50	478.13
09/20/22	Christian Spaulding	Evaluate documents in file related to Humphries' Huntington Beach property.	0.90	286.88
09/21/22	Kara B. Hendricks	Correspond with C. Ney regarding Humphries Hurricane house and available information regarding lease.	0.10	48.03
09/21/22	Kara B. Hendricks	Review disclosures requested by Realtor in relation to sale of Nevada properties and correspond with A. Deering regarding same.	0.20	96.05
09/21/22	Kara B. Hendricks	Review and revise letter to lender of Humphries Huntington Beach property.	0.20	96.05

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09/21/22	Kara B. Hendricks	Revise correspondence to lender of Beasley South Lake Tahoe Property.	0.70	336.18
09/21/22	Kara B. Hendricks	Review subpoena to Lexus Henderson (.1); Request C. Ney prepare notice of subpoena (.1); Follow-up with C. Spaulding regarding A. Nelms subpoena (.1).	0.30	144.08
09/21/22	Kara B. Hendricks	Attention to email from M. Levin regarding GDBH.	0.10	48.03
09/21/22	Kara B. Hendricks	Review and revise subpoena to A. Nelms and request C. Ney assistance with finalizing same.	0.20	96.05
09/21/22	Kara B. Hendricks	Review information from B. Pride-Zorn regarding Beasley G-Wagon and update B. Tranquillo regarding same.	0.10	48.03
09/21/22	Kara B. Hendricks	Correspond with J. del Castillo and G. Winkler regarding JP Morgan request for clarification.	0.10	48.03
09/21/22	Kara B. Hendricks	Respond to email from J. Jongeward regarding return of documents from FBI and status of financial reporting.	0.10	48.03
09/21/22	Kara B. Hendricks	Attention to emails regarding Eco Bat from J. Wolfshohl and follow-up with G. Winkler to schedule time to discuss.	0.20	96.05
09/21/22	Kara B. Hendricks	Review docket for class action proceeding and request C. Ney's assistance in pulling new filings.	0.10	48.03
09/21/22	Kara B. Hendricks	Request C. Spaulding's assistance with letter to A. Chisnall re: Judd Bahama property.	0.10	48.03
09/21/22	Kara B. Hendricks	Correspond with G. Winkler regarding motion for turnover.	0.20	96.05
09/21/22	Cynthia L. Ney	Review docket for updates to Wells Fargo matter, pull docket and specific pleadings and forward same to K.Hendricks.	0.60	105.00
09/21/22	Cynthia L. Ney	Email communications with K.Hendricks and C.Spaulding regarding subpoenas.	0.20	35.00
09/21/22	Christian Spaulding	Evaluate lender in note secured by Tahoe property, including entity status in Nevada and California as well as manager and related entities.	1.20	382.50
09/21/22	Christian Spaulding	Confer with K. Hendricks regarding Judd condo in Bahamas and letter regarding the same. Evaluate documents on hand regarding the same.	0.40	127.50
09/21/22	Christian Spaulding	Evaluate correspondence from L. Palazzo regarding funds held in firm account. Email to K. Hendricks regarding the same.	0.30	95.63
09/21/22	Christian Spaulding	Evaluate response from Vegas Auto Gallery and Draft Subpoena to Andre Nelms regarding Mercedes Benz G-Wagon.	1.30	414.38
09/21/22	Christian Spaulding	Draft correspondence to PenFed Credit Union regarding Humphries' Huntington	1.30	414.38

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		Beach residence and delinquent account related thereto.		
09/21/22	Christian Spaulding	Draft Subpoena, Letter and accompanying documents to Lexus of Henderson regarding sale of Judd asset--Range Rover.	1.10	350.63
09/22/22	Kara B. Hendricks	Highlight materials for discussion with US Attorney and FBI to get clarity on items in their possession and follow-up with G. Winkler.	0.40	192.10
09/22/22	Kara B. Hendricks	Request C. Ney's assistance with download and review documents provided by D. Huish for defendant Tanner.	0.10	48.03
09/22/22	Kara B. Hendricks	Telephone call with P. Matzke regarding Lexus subpoena and provide case background (x2) (.3); Update G. Winkler regarding new information and discuss next steps (.2); Attention to email from P. Matzke (.1).	0.60	288.15
09/22/22	Kara B. Hendricks	Review recent filings in class action case including response to motion to dismiss and pleadings associated with motion to stay and update G. Winkler.	0.40	192.10
09/22/22	Kara B. Hendricks	Revise letter to A. Nelms and work with P. January to finalize and send.	0.20	96.05
09/22/22	Kara B. Hendricks	Participate in call with G. Winkler and D. Scheiss to discuss pending issues and anticipated motions.	1.10	528.28
09/22/22	Kara B. Hendricks	Work with A. Deering regarding format for investor disclosure requested by court and review of notes from hearing regarding same.	0.70	336.18
09/22/22	Kara B. Hendricks	Review correspondence from counsel regarding request for information regarding retainers provided and update chart to track same [counsel communication includes R. Draskovich (Beasley), Lous Palazzo (Jager), R. Goodman (Jeffrey), D. Clucky (Johnson & Rohner), D. Toole (R. Madsen), M. Cook (Murphy).	1.30	624.33
09/22/22	Kara B. Hendricks	Review information regarding Bahama property owned by Judd (.2); Confer with C. Spaulding regarding issues relating to Judd Bahamas property and response to information obtained (.2).	0.40	192.10
09/22/22	Kara B. Hendricks	Revise turnover motion based on discussions with G. Winkler and D. Scheiss.	2.30	1,104.58
09/22/22	Kara B. Hendricks	Provide B. Tranquillo documents obtained from subpoena and provide update regarding efforts to obtain additional information and email correspondence regarding additional vehicles and next steps.	0.30	144.08

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Description of Professional Services Rendered

09/22/22	Kara B. Hendricks	Attention to emails from L. Maningo regarding funds received from Warren Rosegreen and Danny Seybert and update chart for further reference (.3); Follow-up with L. Maningo regarding Rosegreen stipulation (.1).	0.30	144.08
09/22/22	Kara B. Hendricks	Request C. Spaulding's assistance with response to attorney letters regarding funds and researching authorities cited regarding same and provide background regarding claims made.	0.30	144.08
09/22/22	Kara B. Hendricks	Follow-up with C. Ney regarding finalizing car subpoenas and notice and service of same.	0.20	96.05
09/22/22	Cynthia L. Ney	Edit and finalize subpoenas directed to Lexus of Henderson and Andre Helms and arrangements for service of same.	0.60	105.00
09/22/22	Cynthia L. Ney	Preparation of notice of subpoenas issued and service of same upon counsel (.4); communications with K.Hendricks regarding subpoenas and notice (.1).	0.50	87.50
09/22/22	Cynthia L. Ney	Attention to correspondence from counsel in response to K. Hendricks fee letters and discuss next steps with K. Hendricks.	0.40	70.00
09/22/22	Cynthia L. Ney	Communications with process server and K.Hendricks regarding service of subpoena upon A.Nelms.	0.20	35.00
09/22/22	Christian Spaulding	Draft letter to A. Nelms to accompany subpoena regarding Mercedes Benz G-Wagon purportedly obtained from P. Beasley.	0.80	255.00
09/22/22	Christian Spaulding	Confer with K. Hendricks regarding Judd's purchased condo in Bahamas and email from counsel regarding the same.	0.40	127.50
09/22/22	Christian Spaulding	Evaluate correspondence from counsel for Lexus of Henderson regarding Range Rover and confer with K. Hendricks regarding the same.	0.40	127.50
09/23/22	Kara B. Hendricks	Attention to email and information provided regarding GDBH and LOI on property.	0.20	96.05
09/23/22	Kara B. Hendricks	Attention to emails from D. Clucky regarding R. Madsen documents and follow-up regarding scope of materials wanted for unrelated business entities based on information from G. Winkler.	0.20	96.05
09/23/22	Kara B. Hendricks	Correspond via email with C. Ney and C. Spaulding regarding re-issuing subpoena for Lexus vehicle based on new information.	0.20	96.05
09/23/22	Kara B. Hendricks	Attention to emails from G. Winkler and follow-up with Eco Battery counsel and request a formal offer to consider.	0.20	96.05

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Description of Professional Services Rendered

09/23/22	Kara B. Hendricks	Correspond with G. Winkler regarding car subpoenas and potential depositions relating to the same.	0.10	48.03
09/23/22	Kara B. Hendricks	Telephone call from Paula from Lexus regarding documents requested and information in claims file on Range Rover (.2); Review initial set of documents provided and forward to G. Winkler (.1).	0.30	144.08
09/23/22	Kara B. Hendricks	Correspond with C. Ney regarding R. Madsen policies.	0.10	48.03
09/23/22	Kara B. Hendricks	Attention to emails from G. Winkler and O. Stitt regarding Coinbase transfer of funds.	0.10	48.03
09/23/22	Kara B. Hendricks	Update motion for turnover based on email and discussion with G. Winkler and forward same to D. Scheiss.	0.70	336.18
09/23/22	Cynthia L. Ney	Review of voluminous documentation regarding Roland Tanner financials (2.3); communications with K.Hendricks and A.Deering regarding same (.1).	2.40	420.00
09/23/22	Cynthia L. Ney	Email communications with K.Hendricks and A.Deering regarding financial records of defendants.	0.10	17.50
09/23/22	Cynthia L. Ney	Review file regarding Hurricane Utah residence and communications with K.Hendricks regarding same.	0.20	35.00
09/23/22	Cynthia L. Ney	Preparation of Notice of Compliance regarding Vegas Auto Gallery subpoena (.3); forwarding of same to Blake Zorn for signature (.1).	0.40	70.00
09/23/22	Cynthia L. Ney	Download and electronic organization of Richard Madsen financial records (.9); communications with and forwarding of same to Amanda Deering (.2).	1.10	192.50
09/23/22	Cynthia L. Ney	Preparation of subpoena directed to AAG-Las Vegas and arrangements for service of same (.2); forward subpoena to P.Matzke (.1); preparation of Notice of Subpoena and service upon opposing counsel (.3).	0.60	105.00
09/23/22	Cynthia L. Ney	Review file regarding Jager financial records and forwarding of same to K.Hendricks.	0.30	52.50
09/23/22	Christian Spaulding	Confer with team regarding need for new notice of subpoena related to revised subpoena to Lexus of Henderson entity.	0.30	95.63
09/26/22	Kara B. Hendricks	Review additional correspondence from counsel defending right to keep fees and prepare summary for team discussion.	0.50	240.13
09/26/22	Kara B. Hendricks	Review initial research findings regarding property in Bahamas and follow-up with C. Spaulding regarding additional research and scope of letter to property contacts addressing same.	0.30	144.08
09/26/22	Kara B. Hendricks	Attention to L. Maningo emails and drafts	0.40	192.10

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Description of Professional Services Rendered

		of stipulations and follow-up with C. Fronk regarding same.		
09/26/22	Kara B. Hendricks	Review emails regarding turnover motion from D. Scheiss and update same.	0.30	144.08
09/26/22	Kara B. Hendricks	Attention to emails from G. Winkler regarding defendant requests for set-off and evaluate same.	0.40	192.10
09/26/22	Kara B. Hendricks	Attention to emails from G. Winkler and A. Grisby regarding Shoofey tax issues and request C. Ney follow-up regarding representations to confirm payments.	0.30	144.08
09/26/22	Cynthia L. Ney	Review article and pull case law regarding JP Morgan matter (.4); communications with K.Hendricks regarding same (.1).	0.50	87.50
09/26/22	Christian Spaulding	Evaluate jurisdiction and enforceability of Receivership Order in Bahamas in relation to Judd condominium.	3.50	1,115.63
09/27/22	Kyle Ewing	Review and analyze order denying Humphries motion for fees.	0.30	102.00
09/27/22	Kara B. Hendricks	Attention to emails from A. Deering regarding K. Christiansen request for meeting with Receiver.	0.20	96.05
09/27/22	Kara B. Hendricks	Follow-up with C. Ney regarding Shoofey tax findings.	0.10	48.03
09/27/22	Kara B. Hendricks	Attention to emails from J. deCastillo and G. Winkler and documents to facilitate stipulation with US Bank and turnover of funds.	0.20	96.05
09/27/22	Kara B. Hendricks	Telephone call with G. Winkler regarding turnover motion.	0.10	48.03
09/27/22	Kara B. Hendricks	Confer with G. Winkler via email and telephoncially regarding order on Christiansen fee request and impact on response to other counsel and propose next steps.	0.30	144.08
09/27/22	Kara B. Hendricks	Review requested property disclosures for new Nevada property listings and correspond via email with A. Deering regarding proposed language and revisions to same.	0.20	96.05
09/27/22	Kara B. Hendricks	Review information for and participate in team call to provide update on asset recovery efforts and coordinate efforts moving forward, and discuss strategy on pending case related issues and concerns (attendees include G. Winkler, J. Hall, A. Deering, D. Zaro, J. delCastillo).	1.10	528.28
09/27/22	Kara B. Hendricks	Attention to emails requesting Coinbase transfer and discuss with G. Winkler.	0.20	96.05
09/27/22	Kara B. Hendricks	Correspond via email with T. Combs regarding turnover motion and background regarding same.	0.20	96.05
09/27/22	Kara B. Hendricks	Attention to emails regarding L. Jeffries	0.20	96.05

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Description of Professional Services Rendered

		court order compliance and related issues.		
09/27/22	Cynthia L. Ney	Review property records regarding property tax payments made by P.Beasley (.2); communications with K.Hendricks and G.Winkler regarding same (.1).	0.30	52.50
09/27/22	Christian Spaulding	Evaluate information regarding Judd's purchase of condominium in Bahamas and draft letter to Bahamian counsel for developer regarding the same.	2.20	701.25
09/27/22	Christian Spaulding	Evaluate Court's Order Denying Humphries' Motion for Release of Funds for Attorneys Fees.	0.30	95.56
09/28/22	Kara B. Hendricks	Attention to email from K. Christiansen regarding claims filed in bankruptcy case and follow-up to explain Receiver's position and arrange for discussion.	0.20	96.05
09/28/22	Kara B. Hendricks	Review and revise motion for turnover and prepare proposed order relating to same.	1.10	528.28
09/28/22	Kara B. Hendricks	Correspond with A. Deering regarding inquiry regarding unfreezing of N. Hall account by Wells Fargo.	0.10	48.03
09/29/22	Kara B. Hendricks	Review documents provided regarding ECO Bat offer and correspond with G. Winkler regarding same.	0.10	48.03
09/29/22	Kara B. Hendricks	Correspond with A. Deering regarding use of DocuSign by defendants and mechanisms to get additional records.	0.10	48.03
09/29/22	Kara B. Hendricks	Correspond via email with A. Deering regarding additional information needed from R. Tanner (.1); Email D. Huish with request (.1).	0.20	96.05
09/29/22	Kara B. Hendricks	Review emails to A. Grisby regarding unpaid house maintenance bills.	0.10	48.03
09/29/22	Kara B. Hendricks	Review email from D. O'Toole regarding Madsen production.	0.10	48.03
09/29/22	Kara B. Hendricks	Review car fax report and new information from B. Tranquillo regarding vehicle research and follow-up with B. Tranquillo regarding same.	0.30	144.08
09/29/22	Kara B. Hendricks	Review new information regarding purchase of Judd purchase of Land Rover and update G. Winkler.	0.10	48.03
09/29/22	Kara B. Hendricks	Correspond via email with A. Deering regarding Seybert asset purchase.	0.10	48.03
09/29/22	Kara B. Hendricks	Telephone call from Dan at US attorney office regarding stipulation for turnover x2(.2); Follow-up with G. Winkler regarding turnover options (.1).	0.30	144.08
09/29/22	Kara B. Hendricks	Follow-up with C. Fronk regarding D. Sebert and W. Rosegreen requests.	0.10	48.03
09/29/22	Kara B. Hendricks	Attention to information regarding Range Rover purchase by Judd and request C. Spaulding follow-up.	0.10	48.03

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09/30/22	Kara B. Hendricks	Revise letter to A. Chisnall regarding Judd Goldwinn condo purchase.	0.60	288.15
09/30/22	Kara B. Hendricks	Attention to email from A Deering regarding Hurricane rental property and agreement with renter going forward.	0.20	96.05
09/30/22	Kara B. Hendricks	Follow-up with C. Ney regarding new information on Beasley property, and requested case law from 8th Circuit.	0.10	48.03
09/30/22	Kara B. Hendricks	Attention to information from S. Jager regarding Eco Battery offer.	0.20	96.05
09/30/22	Kara B. Hendricks	Attention to email and documents regarding 16 Paradise loan and correspond with G. Winkler regarding same.	0.20	96.05
09/30/22	Kara B. Hendricks	Correspond via email with G. Winkler regarding information regarding what FBI recovered from Humphries.	0.10	48.03
09/30/22	Kara B. Hendricks	Attention to emails and new insurance information for Shoofey residence (P. Beasley).	0.10	48.03
09/30/22	Cynthia L. Ney	Attention to S.Jager and Beasley financial documentation.	0.30	52.50

Total Hours: 107.00

Total Amount: \$ 39,945.34

TIMEKEEPER SUMMARY FOR TASK CODE GW001,

ASSET ANALYSIS AND RECOVERY

Summary of Fees (Standard Rates)

<u>Timekeeper Name</u>	<u>Hours Billed</u>	<u>Standard Rate</u>	<u>Total \$ Amount</u>
Kara B. Hendricks	49.00	565.00	27,685.00
Jason Hicks	4.20	425.00	1,785.00
Kyle Ewing	5.60	400.00	2,240.00
Christian Spaulding	31.70	375.00	11,887.50
Cynthia L. Ney	16.50	295.00	4,867.50
Totals:	107.00		\$ 48,465.00

Summary of Fees (Discounted Rates)

<u>Timekeeper Name</u>	<u>Hours Billed</u>	<u>Average Discounted Rate</u>	<u>Total \$ Amount</u>
Kara B. Hendricks	49.00	480.25	23,532.21
Jason Hicks	4.20	361.25	1,517.25
Kyle Ewing	5.60	340.00	1,904.00
Christian Spaulding	31.70	318.75	10,104.38
Cynthia L. Ney	16.50	175.00	2,887.50
Totals:	107.00		\$ 39,945.34

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Description of Professional Services Rendered

TASK CODE: GW004 CASE ADMINISTRATION

<u>DATE</u>	<u>TIMEKEEPER</u>	<u>DESCRIPTION</u>	<u>HOURS</u>	<u>AMOUNT</u>
09/02/22	Kara B. Hendricks	Review stipulation regarding K. Dean response and correspond with K. Hyson regarding same.	0.20	96.05
09/02/22	Kara B. Hendricks	Review tax professional employment application and emails to determine discounted rate being provided by proposed tax professionals for discussion at upcoming hearing.	0.40	192.10
09/06/22	Kara B. Hendricks	Prepare for hearings on Receiver applications to employ tax professional, Realtor ', party to assist with sale of vehicles, first status report and fee application and outline issues to address with the court.	1.10	528.28
09/07/22	Kara B. Hendricks	Attend hearing on Receiver applications to employ tax professional, realtors, party to assist with sale of vehicles, first status report and fee application.	1.40	672.35
09/07/22	Kara B. Hendricks	Attention to emails from G. Winkler and J. del Castillo regarding hearing and additional information requested by judge.	0.20	96.05
09/09/22	Kara B. Hendricks	Update proposed order regarding motion to employ tax professional and request P. January assistance in filing same.	0.20	96.05
09/13/22	Kara B. Hendricks	Review email from B. Urgra regarding extension request for motion to intervene and follow-up with G. Winkler and J. deCastillo.	0.10	48.03
09/13/22	Kara B. Hendricks	Email C. Fronk and T. Combs regarding request for additional time to file a reply in support of the interpleader moon.	0.20	96.05
09/13/22	Kara B. Hendricks	Review upcoming deadlines including new deadlines referenced by Court at recent hearing including filing of investor lists.	0.20	96.05
09/14/22	Kara B. Hendricks	Telephone call with J. Rickard regarding subpoena notice issues (.2).	0.20	96.05
09/21/22	Kara B. Hendricks	Review draft of frequently asked questions and follow-up with A. Deering regarding same and inquire regarding filing of investor list.	0.20	96.05
09/21/22	Kara B. Hendricks	Review and provide comments to A. Deering regarding investor email update.	0.10	48.03
09/22/22	Kara B. Hendricks	Correspond via email with J. del Castillo regarding deadline for reply to motion to intervene and new filing threats.	0.10	48.03
09/22/22	Kara B. Hendricks	Provide J. Beltran word version of proposed order.	0.10	48.03

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Description of Professional Services Rendered

09/26/22	Kara B. Hendricks	Attention to investor information sheet and follow-up with counsel for C. Masen and L. Jeffries to obtain additional information to update same (.3); Work with A. Deering to update same based on court request for filing (.2).	0.50	240.13
09/26/22	Kara B. Hendricks	Attention to minute order regarding orders rendered and setting hearing and request that P. January follow-up with court clerk regarding scope of same.	0.20	96.05
09/28/22	Kara B. Hendricks	Attention to email from D. O'Toole regarding investor information request and attorney fee issue including response to same and updating A. Deering and G. Winkler.	0.20	96.05
09/29/22	Kara B. Hendricks	Respond to email from attorney K. Christensen regarding client inquiry regarding potential claims.	0.10	48.03
09/30/22	Kara B. Hendricks	Telephone call from M. Cook regarding M. Murphy information.	0.10	48.03
09/30/22	Kara B. Hendricks	Review email from E. Escobar-Gaddi regarding service of investor list (.1); Discuss related issues with G. Winkler (.1); Telephone call to court regarding service (.1); Email counsel requesting deleting and destruction of sealed files and attention to response emails regarding same (.3).	0.60	288.15
09/30/22	Kara B. Hendricks	Review court orders and notes from hearing regarding the filing of investor list (.3); Prepare notice of filing (.2); Follow-up with A. Deering regarding status of list (.1); Draft disclosure language to be included on investors list (.4); Work with E. Escobar-Gaddi to facilitate filing (.1).	1.10	528.28
			Total Hours:	7.50
			Total Amount:	\$ 3,601.92

TIMEKEEPER SUMMARY FOR TASK CODE GW004,

CASE ADMINISTRATION

Summary of Fees (Standard Rates)

Timekeeper Name	Hours Billed	Standard Rate	Total \$ Amount
Kara B. Hendricks	7.50	565.00	4,237.50
Totals:	7.50		\$ 4,237.50

Summary of Fees (Discounted Rates)

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Description of Professional Services Rendered

<u>Timekeeper Name</u>	<u>Hours Billed</u>	<u>Average Discounted Rate</u>	<u>Total \$ Amount</u>
Kara B. Hendricks	7.50	480.26	3,601.92
Totals:	7.50		\$ 3,601.92

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Description of Professional Services Rendered

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Description of Professional Services Rendered**TIMEKEEPER ACTIVITY GRAND TOTAL SUMMARY****Summary of Fees (Standard Rates)**

<u>Timekeeper</u>	<u>Hours</u>	<u>Rate</u>	<u>Amount</u>
Kara B. Hendricks	56.50	565.00	31,922.50
Jason Hicks	4.20	425.00	1,785.00
Kyle Ewing	5.60	400.00	2,240.00
Christian Spaulding	31.70	375.00	11,887.50
Cynthia L. Ney	16.50	295.00	4,867.50
Totals:	114.50		\$ 56,940.00

Summary of Fees (Discounted Rates)

<u>Timekeeper</u>	<u>Hours</u>	<u>Rate</u>	<u>Amount</u>
Kara B. Hendricks	56.50	480.25	27,134.13
Jason Hicks	4.20	361.25	1,517.25
Kyle Ewing	5.60	340.00	1,904.00
Christian Spaulding	31.70	318.75	10,104.38
Cynthia L. Ney	16.50	175.00	2,887.50
Totals:	114.50		\$ 43,547.26

Invoice No.: 1000142507
 Re: SEC v. Beasley (Geoff Winkler, Receiver)
 Matter No.: 209375.010100

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Description of Expenses Billed:

<u>DATE</u>	<u>DESCRIPTION</u>	<u>AMOUNT</u>
08/03/22	VENDOR: LexisNexis - ACH INVOICE#: 3094024818 DATE: 8/31/2022 Lexis Charges: 08/03/22 SEARCH Requested by Berrios, Jerrell Ref: 209375.010100	\$ 15.24
08/09/22	VENDOR: LexisNexis - ACH INVOICE#: 3094024818 DATE: 8/31/2022 Lexis Charges: 08/09/22 SEARCH Requested by Spaulding, Christian Ref: 209375.010100	\$ 15.24
08/11/22	VENDOR: LexisNexis - ACH INVOICE#: 3094024818 DATE: 8/31/2022 Lexis Charges: 08/11/22 SEARCH Requested by Spaulding, Christian Ref: 209375.010100	\$ 137.16
08/12/22	VENDOR: LexisNexis - ACH INVOICE#: 3094024818 DATE: 8/31/2022 Lexis Charges: 08/12/22 SEARCH Requested by Spaulding, Christian Ref: 209375.010100	\$ 182.88
08/24/22	VENDOR: LexisNexis - ACH INVOICE#: 3094024818 DATE: 8/31/2022 Lexis Charges: 08/24/22 SEARCH Requested by Spaulding, Christian Ref: 209375.010100	\$ 15.24
08/25/22	VENDOR: LexisNexis - ACH INVOICE#: 3094024818 DATE: 8/31/2022 Lexis Charges: 08/25/22 SEARCH Requested by Spaulding, Christian Ref: 209375.010100	\$ 91.44
09/14/22	VENDOR: Nationwide Legal, LLC - 4527 INVOICE#: 00000048305 DATE: 9/30/2022 STANDARD PROCESS (48 to 72 HRS)- Vegas Auto Gallery Lotus Cars Las Vegas, 3055 Palms Center Drive, Suite B, Las Vegas NV on 9/14/22 Req'd by/for Ney, Cynthia L.	\$ 105.00
09/22/22	VENDOR: Nationwide Legal, LLC - 4527 INVOICE#: 00000048305 DATE: 9/30/2022 RUSH PROCESS (24 HRS)- Andre Nicholas Nelms, 6035 McLeod Drive, Las Vegas NV on 9/22/22 Req'd by/for Ney, Cynthia L.	\$ 125.00
09/22/22	VENDOR: Nationwide Legal, LLC - 4527 INVOICE#: 00000048305 DATE: 9/30/2022 RUSH PROCESS (24 HRS)- LEXUS OF HENDERSON, 7736 Eastgate Road, Henderson NV on 9/22/22 Req'd by/for Ney, Cynthia L.	\$ 125.00
09/23/22	VENDOR: Nationwide Legal, LLC - 4527 INVOICE#: 00000048305 DATE: 9/30/2022 STANDARD PROCESS (48 to 72 HRS)- , 701 S. Carson Street, Suite 200, Carson City NV on 9/23/22 Req'd by/for Ney, Cynthia L.	\$ 140.00
Total Expenses:		\$ 952.20



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

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

Attn: Geoff Winkler

INVOICE

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

THIS INVOICE REPLACES INVOICE 1000150214

Total Fees: \$ 73,224.57

Expenses:

Other Charges	144.00
Subpoenas	252.00
Information and Research	63.00

Total Expenses: \$ 459.00

Current Invoice: \$ 73,683.57

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

Total Amount Due: \$ 234,564.25

KBH:LC
 Tax ID: 13-3613083



Invoice No.: 1000224348
File No. : 209375.010100

REMITTANCE ADVICE

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

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

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

FOR YOUR CONVENIENCE, WIRE TRANSFER FUNDS TO:

For Wire Instructions:

Bank: WELLS FARGO BANK
ABA #: 121000248

For ACH Instructions:

Bank: WELLS FARGO BANK
ABA# 063107513

CREDIT TO: GREENBERG TRAUIG DEPOSITORY ACCOUNT
ACCOUNT #: 2000014648663

PLEASE

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

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

Greenberg Traurig
PO Box 936769
ATLANTA GA 31193-6769

Wire fees may be assessed by your bank.

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

KBH:LC
Tax ID: 13-3613083

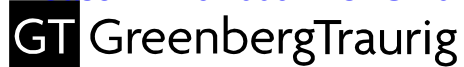


Invoice No. : 1000224348
File No. : 209375.010100

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

KBH:LC

Tax ID: 13-3613083



Invoice No. : 1000224348
 File No. : 209375.010100

Account Statement

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

KBH:LC

Tax ID: 13-3613083

Description of Professional Services Rendered:

TASK CODE: GW001 ASSET ANALYSIS AND RECOVERY

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

Total Hours: 191.90

Total Amount: \$ 68,394.47

TIMEKEEPER SUMMARY FOR TASK CODE GW001,

ASSET ANALYSIS AND RECOVERY

Summary of Fees (Base Rates)

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

Summary of Fees (Discounted Rates)

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

TASK CODE: GW004 CASE ADMINISTRATION

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

10/31/22	Kara B. Hendricks	and send proposed changes to A. Deering and G. Winkler for review. Correspond with A. Deering regarding updating investor list for in camera submission.	0.10	48.02
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Total Hours: 12.50

Total Amount: \$ 3,197.28

TIMEKEEPER SUMMARY FOR TASK CODE GW004,

CASE ADMINISTRATION

Summary of Fees (Base Rates)

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

Summary of Fees (Discounted Rates)

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

TASK CODE: GW005 CLAIMS ADMINISTRATION AND OBJECTIONS

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

TIMEKEEPER SUMMARY FOR TASK CODE GW005.

CLAIMS ADMINISTRATION AND OBJECTIONS

Summary of Fees (Base Rates)

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

Summary of Fees (Discounted Rates)

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

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

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

Summary of Fees (Discounted Rates)

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

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

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Description of Expenses Billed:

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



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

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

Attn: Geoff Winkler

INVOICE

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

THIS INVOICE REPLACES INVOICE 1000197471

Total Fees: \$ 63,414.70

Expenses:

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

Total Expenses: \$ 1,241.00

Current Invoice: \$ 64,655.70

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

Total Amount Due: \$ 225,536.38

KBH:LC

Tax ID: 13-3613083



Invoice No. : 1000224438
File No. : 209375.010100

REMITTANCE ADVICE

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

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

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

FOR YOUR CONVENIENCE, WIRE TRANSFER FUNDS TO:

For Wire Instructions:

Bank: WELLS FARGO BANK
ABA #: 121000248

For ACH Instructions:

Bank: WELLS FARGO BANK
ABA# 063107513

CREDIT TO: GREENBERG TRAUIG DEPOSITORY ACCOUNT
ACCOUNT #: 2000014648663

PLEASE

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

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

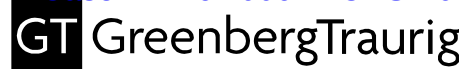
Greenberg Traurig
PO Box 936769
ATLANTA GA 31193-6769

Wire fees may be assessed by your bank.

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

KBH:LC

Tax ID: 13-3613083

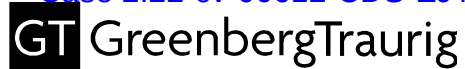


Invoice No. : 1000224438
File No. : 209375.010100

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

KBH:LC

Tax ID: 13-3613083



Invoice No. : 1000224438
 File No. : 209375.010100

Account Statement

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

KBH:LC

Tax ID: 13-3613083

Description of Professional Services Rendered:

TASK CODE: GW001 ASSET ANALYSIS AND RECOVERY

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

TotalHours: 171.80

TotalAmount: \$ 61,803.74

TIMEKEEPER SUMMARY FOR TASK CODE GW001,

ASSET ANALYSIS AND RECOVERY

Summary of Fees (Base Rates)

<u>Timekeeper Name</u>	<u>Hours Billed</u>	<u>Base Rate</u>	<u>Total\$ Amount</u>
Kara B. Hendricks	47.70	565.00	26,950.50
Kyle Ewing	54.30	400.00	21,720.00
Adrianna Gorton	1.00	450.00	450.00
Zaniah A. Jordan	0.80	370.00	296.00
Christian Spaulding	53.60	375.00	20,100.00
Amy L. Hershberger	2.20	310.00	682.00
Cynthia L. Ney	12.20	295.00	3,599.00
Totals:	171.80		\$ 73,797.50

Summary of Fees (Discounted Rates)

<u>Timekeeper Name</u>	<u>Hours Billed</u>	<u>Average Discounted Rate</u>	<u>Total\$ Amount</u>
Kara B. Hendricks	47.70	480.25	22,907.94
Kyle Ewing	54.30	340.00	18,462.00
Adrianna Gorton	1.00	382.50	382.50
Zaniah A. Jordan	0.80	314.50	251.60
Christian Spaulding	53.60	318.75	17,085.00
Amy L. Hershberger	2.20	263.50	579.70
Cynthia L. Ney	12.20	175.00	2,135.00
Totals:	171.80		\$ 61,803.74

TASK CODE: GW002 ASSET DISPOSITION

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

TIMEKEEPER SUMMARY FOR TASK CODE GW002.

ASSET DISPOSITION

Summary of Fees (Base Rates)

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

Summary of Fees (Discounted Rates)

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

TASK CODE: GW004 CASE ADMINISTRATION

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

TIMEKEEPER SUMMARY FOR TASK CODE GW004.

CASE ADMINISTRATION

Summary of Fees (Base Rates)

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

Summary of Fees (Discounted Rates)

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

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

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

Summary of Fees (Discounted Rates)

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

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

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Description of Expenses Billed:

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



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

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

Attn: Geoff Winkler

INVOICE

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

THIS INVOICE REPLACES INVOICE 1000166978

Total Fees: \$ 59,170.30

Expenses:

Information and Research 389.93

Total Expenses: \$ 389.93

Current Invoice: \$ 59,560.23

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

Total Amount Due: \$ 159,018.12

KBH:LC
Tax ID: 13-3613083



Invoice No. : 1000224498
File No. : 209375.010100

REMITTANCE ADVICE

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

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

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

FOR YOUR CONVENIENCE, WIRE TRANSFER FUNDS TO:

For Wire Instructions:

Bank: WELLS FARGO BANK
ABA #: 121000248

For ACH Instructions:

Bank: WELLS FARGO BANK
ABA#: 063107513

CREDIT TO: GREENBERG TRAUIG DEPOSITORY ACCOUNT
ACCOUNT #: 2000014648663

PLEASE

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

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

Greenberg Traurig
PO Box 936769
ATLANTA GA 31193-6769

Wire fees may be assessed by your bank.

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

KBH:LC
Tax ID: 13-3613083

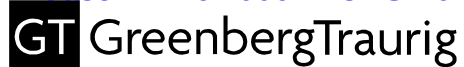


Invoice No. : 1000224498
File No. : 209375.010100

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

KBH:LC

Tax ID: 13-3613083



Invoice No. : 1000224498
 File No. : 209375.010100

Account Statement

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

KBH:LC

Tax ID: 13-3613083

Description of Professional Services Rendered:

TASK CODE: GW001 ASSET ANALYSIS AND RECOVERY

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

Total Hours: 149.80

Total Amount: \$ 54,100.77

TIMEKEEPER SUMMARY FOR TASK CODE GW001,

ASSET ANALYSIS AND RECOVERY

Summary of Fees (Base Rates)

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

Summary of Fees (Discounted Rates)

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

TASK CODE: GW004 CASE ADMINISTRATION

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

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

Total Hours: 12.95

Total Amount: \$ 3,967.50

TIMEKEEPER SUMMARY FOR TASK CODE GW004,

CASE ADMINISTRATION

Summary of Fees (Base Rates)

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

Summary of Fees (Discounted Rates)

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

TASK CODE: GW005 CLAIMS ADMINISTRATION AND OBJECTIONS

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

TIMEKEEPER SUMMARY FOR TASK CODE GW005.

CLAIMS ADMINISTRATION AND OBJECTIONS

Summary of Fees (Base Rates)

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

Summary of Fees (Discounted Rates)

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

TASK CODE: GW011 STATUS REPORTS

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

TIMEKEEPER SUMMARY FOR TASK CODE GW011,

STATUS REPORTS

Summary of Fees (Base Rates)

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

Summary of Fees (Discounted Rates)

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

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

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

Summary of Fees (Discounted Rates)

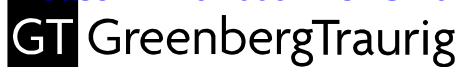
<u>Timekeeper</u>	<u>Hours</u>	<u>Rate</u>	<u>Amount</u>
David Edington	0.30	518.50	155.55
Kara B. Hendricks	51.00	481.91	24,577.50
Kyle Ewing	49.40	340.00	16,796.00
Zaniah A. Jordan	0.50	314.50	157.25
Christian Spaulding	41.80	318.75	13,323.75
Akke Levin	0.40	467.50	187.00
Cynthia L. Ney	20.30	175.00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

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

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Description of Expenses Billed:

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



Invoice No.: 1000315088
 File No. : 209375.010100
 Bill Date : May 15, 2023

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

Attn: Geoff Winkler

INVOICE

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

THIS INVOICE REPLACES INVOICE 1000219800 and INVOICE 1000290373

Total Fees: \$ 43,747.08

Expenses:

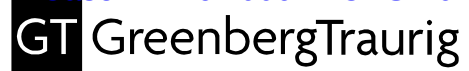
Business Meals	384.21	
Messenger/Courier Services	52.50	
Recording Charges	60.00	
UPS Charges	15.22	
Information and Research	69.00	
Total Expenses:		\$ 580.93

Current Invoice: \$ **44,328.01**

Previous Balance (see attached statement): \$ 235,692.81

Total Amount Due: \$ **280,020.82**

KBH:LC
 Tax ID: 13-3613083



Invoice No.: 1000315088
File No. : 209375.010100

KBH:LC
Tax ID: 13-3613083



Invoice No.: 1000315088
File No. : 209375.010100

REMITTANCE ADVICE

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

CLIENT NAME: WINKLER, GEOFF
FILE NUMBER: 209375.010100
INVOICE NUMBER: 1000315088*
BILLING PROFESSIONAL: Kara B. Hendricks

Current Invoice:	\$	44,328.01
Previous Balance:	\$	235,692.81
Total Amount Due:	\$	280,020.82

FOR YOUR CONVENIENCE, WIRE TRANSFER FUNDS TO:

For Wire Instructions:

Bank: WELLS FARGO BANK
ABA #: 121000248

For ACH Instructions:

Bank: WELLS FARGO BANK
ABA#: 063107513

CREDIT TO: GREENBERG TRAUIG DEPOSITORY ACCOUNT
ACCOUNT #: 2000014648663

PLEASE

REFERENCE: CLIENT NAME: WINKLER, GEOFF
FILE NUMBER: 209375.010100
INVOICE NUMBER: 1000315088*
BILLING
PROFESSIONAL: Kara B. Hendricks

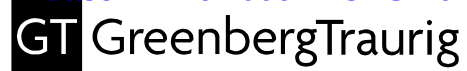
IF YOU WISH TO PAY BY CHECK PLEASE REMIT TO THE ADDRESS BELOW:

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

Wire fees may be assessed by your bank.

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

KBH:LC
Tax ID: 13-3613083

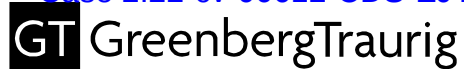


Invoice No. : 1000315088
File No. : 209375.010100

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

KBH:LC

Tax ID: 13-3613083



Invoice No. : 1000315088
 File No. : 209375.010100

Account Statement

<u>Date</u>	<u>Invoice #</u>	<u>Fees Due</u>	<u>Expenses Due</u>	<u>Other Due</u>	<u>Total Due</u>
07/19/22	1000035547	16,627.52	0.00	0.00	16,627.52
10/03/22	1000096060	12,029.69	0.00	0.00	12,029.69
11/09/22	1000142381	16,674.86	0.00	0.00	16,674.86
11/09/22	1000142507	8,666.16	0.00	0.00	8,666.16
02/14/23	1000224348	14,644.91	0.00	0.00	14,644.91
02/14/23	1000224438	12,682.94	0.00	0.00	12,682.94
02/14/23	1000224498	11,834.06	0.00	0.00	11,834.06
04/17/23	1000271876	45,156.86	0.00	0.00	45,156.86
04/25/23	1000290396	35,566.93	0.00	0.00	35,566.93
05/11/23	1000312069	60,596.93	1,211.95	0.00	61,808.88
	Totals:	\$ 234,480.86	\$ 1,211.95	\$ 0.00	\$ 235,692.81

KBH:LC

Tax ID: 13-3613083

Description of Professional Services Rendered:

TASK CODE: GW001 ASSET ANALYSIS AND RECOVERY

<u>DATE</u>	<u>TIMEKEEPER</u>	<u>DESCRIPTION</u>	<u>HOURS</u>	<u>AMOUNT</u>
01/03/23	Kara B. Hendricks	Update stipulation for sale of Heber City properties and forward to L. Palazzo for signature (.2); Update J. McGraw and A. Deering regarding same (.1);	0.30	144.08
01/03/23	Kara B. Hendricks	Correspond via email from A. Deering and J. del Castillo regarding litigation update for status report;	0.10	48.03
01/03/23	Kara B. Hendricks	Telephone call with G. Winkler regarding US Marshall request and email J. Beltran regarding same;	0.20	96.05
01/03/23	Kara B. Hendricks	Review email and telephone call with A. Deering regarding Ruffian House and next steps with lender;	0.20	96.05
01/03/23	Kara B. Hendricks	Review emails regarding Seybert stipulation;	0.10	48.03
01/03/23	Cynthia L. Ney	Analysis and forwarding of supplemental materials received from Mark Murphy to A.Deering (.4); electronic case organization of defendant materials (.3)	0.70	122.50
01/04/23	Kyle Ewing	Conference with K. Hendricks re: arrangements to visit prison to obtain property transfer signatures from M. Beasley and notary requirements for the same; email communication re: the same	0.10	34.00
01/04/23	Kara B. Hendricks	Follow-up regarding notary requirements for prisoners and confer with K. Neilson regarding assistance to obtain M. Beasley signatures on documents and various emails with G. Winkler regarding same;	0.40	192.10
01/04/23	Kara B. Hendricks	Telephone call with A. Deering regarding Beasley documents needed to be finalized to facilitate property transfer;	0.20	96.05
01/04/23	Kara B. Hendricks	Telephone call from J. McGraw regarding revisions needed to Heber City stipulation and pending transactions (.2); Review new materials and update stipulation for Jager signature(.2); Revise stipulation and discuss same with J. McGraw (1.1);	1.50	720.38
01/04/23	Kara B. Hendricks	Attention to email from A. Deering regarding Ruffian property fees and telephone call to discuss same;	0.10	48.03
01/04/23	Kara B. Hendricks	Review email and information from G. Winkler regarding Beasley visit and follow-up;	0.20	96.05
01/04/23	Kara B. Hendricks	Review email and documents from A. Deering regarding previously filed Jager stipulation and related follow-up;	0.30	144.08

01/05/23	Kyle Ewing	Participate in weekly receivership meeting with AFS team, GT (K. Hendricks), and AM (D. Zaro and J. DelCastillo) re: ongoing work, including sales of real property (and obtaining Beasleys' signatures as necessary); defendants' failures to provide document required by appointment order; documents related to pest control companies; and ongoing issues with contempt by various defendants and issues re: title insurance for sales of property; follow-up with K. Hendricks	1.60	544.00
01/05/23	Kyle Ewing	Plan and prepare for attending (observing) tomorrow's Rule 26(f) conference initiated by plaintiff (SEC); communication with K. Hendricks re: the same	0.20	68.00
01/05/23	Kara B. Hendricks	Telephone call from J. McGraw regarding revisions to Heber City stipulation and timing concerns (.2); Review proposed revisions to stipulation and finalize same (.3);	0.50	240.13
01/05/23	Kara B. Hendricks	Correspond with K. Ewing regarding 26(f) conference;	0.10	48.03
01/05/23	Kara B. Hendricks	Review order denying motion to strike as moot and follow-up with K. Dean regarding payment;	0.10	48.03
01/05/23	Kara B. Hendricks	Reach out to contacts for Realtor recommendations in Southern Utah;	0.10	48.03
01/05/23	Kara B. Hendricks	Follow-up with C. Jorgenson regarding transfer tax issue;	0.10	48.03
01/05/23	Kara B. Hendricks	Email C. Perkins regarding funds expected from Howard & Howard;	0.10	48.03
01/05/23	Kara B. Hendricks	Review and respond to email from J. Beltran regarding Beasley visit;	0.10	48.03
01/05/23	Kara B. Hendricks	Participate in team (with G. Winkler, A. Deering, J. McGraw, K. Ewing, D. Zaro, J. delCastillo) call and discuss forensic accounting, asset recover efforts including status of property sales and documentation needed from Beasley, title issues, business assets and pending motions;	1.50	720.38
01/06/23	Kyle Ewing	Attend the parties' Rule 26(f) conference (for observational purposes only); plan and prepare for the same and provide email update on results of conference to receiver's team	1.40	476.00
01/06/23	Kyle Ewing	Conference with K. Hendricks re: efforts to terminate/not renew lease of Hurraacan, UT, property and receiver's rights with regard to the same	0.10	34.00
01/06/23	Kara B. Hendricks	Respond to email from J. delCastillo regarding 26(f) conference;	0.10	48.03
01/06/23	Kara B. Hendricks	Request K. Ewing's assistance with Hurricane property lease letter;	0.10	48.03
01/08/23	Kara B. Hendricks	Email counsel for SEC regarding status meeting with Receiver;	0.10	48.03
01/08/23	Kara B. Hendricks	Review email and information from L.	0.10	48.03

		Jeffery;		
01/09/23	Kara B. Hendricks	Follow-up with L. Palazza regarding Jager stipulation for sale of Heber City property;	0.10	48.03
01/09/23	Kara B. Hendricks	Correspond with G. Winkler and C. Fronk regarding updates;	0.10	48.03
01/09/23	Kara B. Hendricks	Confer with G. Winkler and G. McGraw regarding pending sales and realtor and title questions;	0.50	240.13
01/09/23	Christian Spaulding	Confer with K. Hendricks regarding retention of eDiscovery vendor and need for motion to employ.	0.20	63.75
01/10/23	Kyle Ewing	Review and analyze SEC's draft Rule 26(f) conference report/scheduling order; telephonic communication with K. Hendricks re: the same	0.40	136.00
01/10/23	Kyle Ewing	Email communication with C. Fronk (counsel for SEC) re: proposed scheduling order	0.20	68.00
01/10/23	Kara B. Hendricks	Attention to email from A. Priebe regarding stipulation compliance and request C. Ney review and verify information contained therein;	0.10	48.03
01/10/23	Kara B. Hendricks	Telephone call and email to D. Hollingsworth to get update on Judd stipulation and update G. Winkler;	0.40	192.10
01/10/23	Kara B. Hendricks	Correspond with J. McGraw regarding title company request relating to Heber City properties;	0.10	48.03
01/10/23	Kara B. Hendricks	Review email from C. Fronk and draft 26(f) report and correspond and confer with K. Ewing regarding same;	0.30	144.08
01/10/23	Cynthia L. Ney	Review compliance documents prepared by A.Priebe and defendants' documentation provided to assure we had not received missing materials (.7); communications and pull documents for K.Hendricks review (.3).	1.00	175.00
01/11/23	Kyle Ewing	Email communication with K. Hendricks re: continuing the investor call previously scheduled for today and next steps w/ respect to receivership real property located in Hurricane, UT	0.10	34.00
01/11/23	Kara B. Hendricks	Review initial information from Realtor regarding Hurricane property and correspond with G. Winkler regarding same;	0.20	96.05
01/11/23	Kara B. Hendricks	Follow-up regarding potential Utah Realtors to assist with sale of Hurricane property and telephone call with T. Miller regarding same (.6); Request assistance from Utah attorney regarding lease termination agreement and provide background (.3); Prepare draft lease termination letter (.3);	1.20	576.30
01/11/23	Kara B. Hendricks	Correspond with M. Pham regarding release of lis pendens on Heber City properties and reach out to Utah office for	0.40	192.10

		assistance in finalizing and notarizing same;		
01/11/23	Kara B. Hendricks	Review email with executed Jager stipulation relating to Heber City properties and follow-up with C. Fronk regarding finalizing and filing same;	0.20	96.05
01/11/23	Kara B. Hendricks	Attention to emails from J. Hall and G. Winkler regarding defendant reconciliation;	0.10	48.03
01/11/23	Kara B. Hendricks	Review and follow-up regarding defendants and compliance with disclosure requirements;	0.30	144.08
01/12/23	Kyle Ewing	Brief preliminary review of K. Dean's latest repetitive filing; email communication with G. Winkler, K. Hendricks, and C. Spaulding re: the same	0.10	34.00
01/12/23	Kara B. Hendricks	Review order regarding Heber City property and forward to J. McGraw with update re lis pendens issues;	0.10	48.03
01/12/23	Kara B. Hendricks	Review emails regarding M. Beasley meeting;	0.10	48.03
01/12/23	Kara B. Hendricks	Participate in team meeting and discussion regarding asset identification and recover, forensic accounting, court filings, assistance needed and next steps (G. Winkler, J. Hall, A. Deering, J. del Castillo, D. Zaro, M. Pham, M. McCraw in attendance);	1.20	576.30
01/12/23	Kara B. Hendricks	Correspond with S. Williams to work through logistics associated with Heber City lis pendens request;	0.20	96.05
01/12/23	Kara B. Hendricks	Work to facilitate termination of lis pendens for Heber City properties including discussions with M. McCraw and M. Pham and M. Rasich (.8); Update lis pendens documents (.3);	1.10	528.28
01/12/23	Christian Spaulding	Communications with team regarding most recent filing by Kamille Dean and avenue to respond thereto.	0.30	95.62
01/13/23	Kara B. Hendricks	Review new Dean objection/appeal relating to fee award and follow-up with C. Spaulding regarding response;	0.20	96.05
01/13/23	Kara B. Hendricks	Call with C. Fronk, P. Salmi, J. Hall and G. Winkler regarding accounting records;	0.40	192.10
01/13/23	Kara B. Hendricks	Correspond with T. Miller regarding Hurricane Property and forward pictures to AFS team; Revise lease termination letter and notice to vacate;	0.60	288.15
01/13/23	Kara B. Hendricks	Follow-up regarding lis pendens documents for Heber City sale;	0.20	96.05
01/13/23	Kara B. Hendricks	Review information regarding Utah lease termination provisions and follow-up with A. Weinberg-Fahey regarding service requirements;	0.20	96.05
01/16/23	Kyle Ewing	Review preliminary schedule of outflows for Beasley IOLTA account provided by J. Hall; confer with K. Hendricks re: the same	0.30	102.00

		and tomorrow's meetings		
01/16/23	Kara B. Hendricks	Attention to emails regarding Hurricane property and finalize letter and notice;	0.10	48.03
01/16/23	Kara B. Hendricks	Attention to emails from G. Winkler regarding Judd stipulation and forward to D. Hollingsworth;	0.10	48.03
01/16/23	Kara B. Hendricks	Attention to email from J. McGraw regarding Huntington Beach stipulation and follow-up regarding same;	0.10	48.03
01/16/23	Kara B. Hendricks	Confer with K. Ewing regarding upcoming client meeting and hearing coverage;	0.20	96.05
01/17/23	Kyle Ewing	Attend meeting with G. Winkler, K. Hendricks, and counsel for the SEC (XX) in advance of today's hearings before the Court; plan and prepare for the same and follow up with K. Hendricks	1.50	510.00
01/17/23	Kara B. Hendricks	Telephone call with J. McGraw regarding Beasley and Humphries stipulations;	0.20	96.05
01/17/23	Kara B. Hendricks	Prepare for and attend status check and hearings before Judge Silva;	2.80	1,344.70
01/17/23	Kara B. Hendricks	Meet with G. Winkler, C. Fronk, and K. Ewing to discuss defendant accounting information and case issues;	1.20	576.30
01/17/23	Kara B. Hendricks	Correspond with D. Hollingsworth regarding Judd stipulation and asset turnover;	0.10	48.03
01/17/23	Kara B. Hendricks	Update stipulation to facilitate sale of Humphries property in Huntington Beach and circulate to counsel for review, comment and signatures;	0.50	240.13
01/17/23	Kara B. Hendricks	Return call to C. Jorgensen regarding transfer tax issues;	0.10	48.03
01/17/23	Kara B. Hendricks	Correspond via email with A. Deering Hurricane property and sale price; Finalize letter to tenant and work with E. Escobar-Gaddi on service of notice to vacate;	0.30	144.08
01/17/23	Kara B. Hendricks	Review court docket to address pending matters at status hearing; Correspond with M. Pham regarding hearing on motion to remand adversary proceeding back to state court;	0.40	192.10
01/17/23	Christian Spaulding	Evaluate consulting agreement and draft Motion to Employ Aitheras, LLC for litigation support services.	2.00	637.53
01/18/23	Kyle Ewing	Email communication with G. Winkler re: his receipt of Humphries funds seized by FBI and review prior correspondence on the issue; follow-up with US Attorneys' office re: the same	0.50	170.00
01/18/23	Kyle Ewing	Conference with K. Hendricks re: C. Perkins' request to reduce receivership property turnover ordered by the Court and the results of yesterday's status hearing with the Court and the Receiver's meeting today with M. Beasley	0.50	170.00
01/18/23	Kara B. Hendricks	Attention to emails to/from G. Winkler regarding transfer from Treasury and	0.10	48.03

01/18/23	Kara B. Hendricks	follow-up regarding Judd transfer; Follow-up with K. Neilson regarding documents and information needed for notary project;	0.20	96.05
01/18/23	Kara B. Hendricks	Meet with G. Winkler and discuss meeting with M. Beasley and review signed documents;	0.60	288.15
01/18/23	Kara B. Hendricks	Correspond with A. Deering regarding communication with tenants at Hurricane property and provide correspondence regarding same;	0.10	48.03
01/18/23	Kara B. Hendricks	Meet with G. Winkler and collect Arizona lis pendens and follow-up with Phoenix office for recording of same;	0.20	96.05
01/18/23	Kara B. Hendricks	Telephone call with K. Perkins regarding retained Madsen funds; Follow-up with K. Ewing regarding hearing notes;	0.30	144.08
01/18/23	Amy L. Hershberger	Assist with reviewing executed Notices of Lis Pendens for Pecos Road and S. 163 Street properties for recordation with Maricopa County Recorder.	0.10	17.50
01/18/23	Christian Spaulding	Evaluate K. Dean's Objection to Magistrate 12/29/22 Order and begin draft of Response thereto.	5.30	1,689.37
01/18/23	Christian Spaulding	Review authority cited by Kamille Dean for applicability to the instant matter. Review Dean's prior filings.	2.70	860.62
01/19/23	Kyle Ewing	Multiple emails with C. Farago (DOJ) re: transfer from USMS of seized cash of Humphries and Judds; conference with K. Hendricks re: the same; review documentation of interest computed and provided by USMS and email communication with G. Winkler re: the same	0.50	170.00
01/19/23	Kyle Ewing	Participate in weekly receiver team meeting with G. Winkler and AFS staff (.9), AM (J. DelCastillo, D. Zaro, and M. Pham) and K. Hendricks re: receiver's ongoing pursuit of receivership property, including real and personal property possessed by amended defendants, the ongoing effort to sell real property already in Receiver's possession, and issues related to various investments that now belong to the estate (.8), plan and prepare for the same and follow up with K. Hendricks re: GT action items (.5)	2.20	748.00
01/19/23	Kara B. Hendricks	Debrief with K. Nielson regarding meeting with Beasley, next steps regarding signed documents and expected notary needs going forward;	0.30	144.08
01/19/23	Kara B. Hendricks	Confer with K. Ewing regarding pending projects including Motion to employ Aethrias, assessment of M&MP holdings, assessment of pest control entities, and anticipated information from A. Gigsby;	0.50	240.13

01/19/23	Kara B. Hendricks	Participate in call with Receiver team (A. Deering, G. Winkler, J. Hall, J. McGraw), J. del Castillo, D. Zaro, K. Ewing, discuss Beasley meeting, pending asset transactions, meetings with defendants, recovery efforts, court filings, etc.	0.90	432.23
01/19/23	Amy L. Hershberger	Assist with recording Notices of Lis Pendens for Pecos Road and S. 163 Street properties with Maricopa County Recorder's Office.	0.40	70.00
01/19/23	Christian Spaulding	Evaluate docket and Dean's prior filings. Determine that Dean's prior filings contained same arguments made in present Objection. Draft overview of the same for team.	2.30	733.12
01/20/23	Kyle Ewing	Review and analyze ancillary proceeding pleadings, including any impact on Receiver's investigation under the appointment order	0.20	68.00
01/20/23	Kyle Ewing	Develop and consider strategic options for approaching remaining defendants re: turnover of remaining assets frozen by the court's preliminary injunction; begin drafting form letter for use in connection with the same	0.30	102.00
01/20/23	Kyle Ewing	Telephonic conference with J. McGraw (AFS) re: stipulation and order to sell Humphries property (.3), multiple email communications with counsel for Humphries and the SEC (.9), edit stipulation to address edits of counsel for J. Humphries and finalize stipulation in preparation for filing (.7)	1.90	646.00
01/20/23	Kyle Ewing	Attend and observe AFS investor meeting via zoom (led by G. Winkler); note investor questions including re: pest control business; follow-up with A. Deering re: investor questions	0.80	272.00
01/20/23	Kyle Ewing	Continue review and analysis of pest businesses in which defendants' interests belong to the receivership estate and information re: the businesses received to date to evaluate the receiver's options for monetizing the value of the receivership property, including various pest control businesses maintained by defendants	1.50	510.00
01/20/23	Kyle Ewing	Review and analyze documents related to search of Humphries residences in connection with evaluating recovery of Humphries' assets in Huntington Beach property	0.30	102.00
01/20/23	Kyle Ewing	Email communication with E. Escobar-Gaddi and K. Hendricks re: receipt of documents re: P. Beasley's potentially improper use of receivership property from A. Grigsy, including cash, credit cards, and proceeds from sale of Ferrari, Aston	0.20	68.00

		Martin, and G. Wagon; begin reviewing list of files provided		
01/20/23	Kara B. Hendricks	Review emails regarding Huntington Beach stipulation and follow-up with K. Ewing regarding same;	0.20	96.05
01/21/23	Kyle Ewing	Initial analysis of documents provided by A. Grigsby in response to Court's order to produce documents relating to assets sold by Beasleys and potential use of the same to pay P. Beasley's legal fees (1.3), draft and transmit email memo re: the same to AFS (.5), communication with K. Hendricks re: approach for analyzing the same and supplementing the Receiver's motion for an OSC as necessary/appropriate (.2)	2.00	680.00
01/23/23	Kyle Ewing	Receive various deeds and stipulations executed by P. Beasley; communication with K. Hendricks, AFS team, and AM team re: procedure for moving sales of Beasley properties toward closing and stipulation(s) in support of the same	0.50	170.00
01/23/23	Kyle Ewing	Begin evaluating potential subpoenas to be issued to individuals/entities associated with various pest control businesses in which Defendants invested and/or transferred assets belonging to J&J entities; confer with K. Hendricks re: the same	0.30	102.00
01/23/23	Kara B. Hendricks	Correspond with K. Ewing regarding Paula Beasley documents; Review information from G. Winkler regarding recording and next steps and follow-up with J. delCastillo;	0.50	240.13
01/23/23	Kara B. Hendricks	Follow-up on status report;	0.10	48.03
01/23/23	Kara B. Hendricks	Telephone call with G. Winkler regarding transfer of Beasley properties to J&J Consulting and prepare update to SEC and provide documents for approval and signature (.5); Discuss document concerns with K. Ewing and follow-up regarding exhibits needed for filing of stipulation (.6); Review emails and documents from A. Deering regarding property descriptions and follow-up (.3);	1.40	672.35
01/23/23	Kara B. Hendricks	Telephone call with J. McGraw regarding sale of Lake Tahoe Property and follow-up via email with E. Dobberstein regarding payoff amount;	0.30	144.08
01/23/23	Christian Spaulding	Evaluate Kamille Dean Objection to Magistrate Order and draft response thereto.	5.90	1,880.62
01/24/23	Kyle Ewing	Continue coordinating filing of stipulation(s) related to sale of properties owned by Beasleys (.3), email communication and conference with GT team and AFS team re: the same (.6), review and revise stipulation and its	1.70	578.00

		exhibits in connection with the same and finalize in preparation for filing (.8)		
01/24/23	Kyle Ewing	Email communication/conference with G. Winkler and K. Hendricks re: obtaining Judd assets seized by FBI (cash/wire and physical items) from U.S. Marshalls service	0.40	136.00
01/24/23	Kara B. Hendricks	Discuss return of property from US Marshall office with G. Winkler and return call to facilitate same;	0.40	192.10
01/24/23	Kara B. Hendricks	Review email regarding Beasley stipulation and follow-up with K. Ewing regarding same;	0.30	144.08
01/24/23	Kara B. Hendricks	Review and revise response to objection filed by Dean regarding fee award and follow-up with C. Spaulding regarding same;	1.50	720.38
01/24/23	Christian Spaulding	Continue and finalize draft of Response to Kamille Dean Objection to Magistrate 12-29-22 Order.	5.80	1,848.75
01/25/23	Kyle Ewing	Review and revise C. Spaulding's draft motion to employ Aitheras (2.7), review Aitheras proposed contract in connection with the same (.3), email communication with J. Hall re: the motion and Aitheras's onboarding process (.3)	3.30	1,122.00
01/25/23	Kyle Ewing	Begin drafting declaration of Aitheras in support of receiver's motion to employ Aitheras (litigation support consultant)	0.90	306.00
01/25/23	Kyle Ewing	Revise stipulation and order to transfer Beasley properties to reflect the Receiver and SEC's consent to interlineations provided by M. Beasley; email communication with K. Hendricks, G. Winkler, and C. Fronk (counsel for SEC) re: the same; draft, review, and revise notice of compliance with Court's minute order re: the same	1.00	340.00
01/25/23	Kara B. Hendricks	Correspond with G. Winkler regarding ORC holdings and letter to general partner;	0.10	48.03
01/25/23	Kara B. Hendricks	Attention to emails from A. Deering and J. Hall regarding additional document request to Murphy and follow-up regarding scope based on review and information in court filings from Murphy regarding extent of work done;	0.50	240.13
01/25/23	Kara B. Hendricks	Attention to email from C. Perkins regarding turnover of Madsen funds paid to counsel and update G. Winkler;	0.10	48.03
01/26/23	Kyle Ewing	Finish drafting declaration of Aitheras in support of receiver's motion to employ litigation support consultant (1.5), review and revise the same (.5), conference with K. Hendricks and email communication with J. Hall re: the same (.2)	2.20	748.00
01/26/23	Kyle Ewing	Email communication with D. Zaro (AM)	1.80	612.00

		and A. Deering (AFS) re: follow-up stipulations for sales of specific Beasley properties (.9), review stipulations and edits suggested by title officer to ensure consistency with as-filed M. Beasley stipulation re: the same (.2), confer with K. Hendricks re: the same (.2), revise and finalize stipulations and exhibits in preparation for filing the same (.5)		
01/26/23	Kyle Ewing	Continue reviewing and revising C. Spaulding's draft motion to employ Aitheras (2.2), research law re: reasonableness of data hosting and other eDiscovery costs (1.8)	4.00	1,360.00
01/26/23	Kyle Ewing	Conference with K. Hendricks and C. Ney (GT) re: GT needs for transferring (and accessing) data to be managed by Aitheras	0.30	102.00
01/26/23	Kara B. Hendricks	Attention to stipulations for the sale of Ruffian properties including correspondence with D. Zaro regarding same and forwarding to counsel for SEC and K. Ewing's assistance with exhibits;	0.50	240.13
01/26/23	Kara B. Hendricks	Attention to email from M. Barkhanoy regarding document access and storage and follow-up with C. Ney and K. Ewing regarding same;	0.20	96.05
01/26/23	Kara B. Hendricks	Follow-up with K. Ewing on finalizing employment application for e-services;	0.10	48.03
01/26/23	Kara B. Hendricks	Follow-up with G. Winkler regarding response to Dean appeal;	0.20	96.05
01/26/23	Kara B. Hendricks	Begin preparation of letter regarding ORC holdings and follow-up with G. Winkler based on available information from secretary of state;	0.40	192.10
01/27/23	Kyle Ewing	Finalize stipulations related to sales of 4 Beasley properties (3 Ruffian Road and Via Regina) for filing; communication with GT team and A. Deering (AFS) re: the same	0.30	102.00
01/27/23	Kyle Ewing	Finish researching law re: reasonableness of data hosting and eDiscovery costs in support of draft motion to employ Aitheras (1.3), review and revise draft motion accordingly (2.2), transmit motion to K. Hendricks and AFS/AM for review (.3)	3.80	1,292.00
01/27/23	Kyle Ewing	Review B. Tranquilo's notes from a review of Beasley's documents; confer with K. Hendricks re: approach to renewed motion for an OSC re: contempt of A. Grigsby and P. Beasley; plan and prepare for drafting the same	0.30	102.00
01/27/23	Kyle Ewing	Email communication with M. Pham (AM) and K. Hendricks re: procedure on remand in Nevada state court	0.20	68.00
01/27/23	Kara B. Hendricks	Correspond with M. Pham and K. Ewing regarding remand order and state court action; Follow-up with M. Cook and	0.30	144.08

		request filing of remand notice and dismissal;		
01/27/23	Kara B. Hendricks	Correspond with A. Deering regarding Ruffian foreclosure notice;	0.10	48.03
01/27/23	Kara B. Hendricks	Prepare letters regarding ORC Holdings including letter regarding distributions and letter to authorize Colletti to look for purchaser and sale interest;	1.30	624.33
01/27/23	Kara B. Hendricks	Follow-up with A. Deering regarding filing of stip for Ruffian properties, review emails and finalize same;	0.30	144.08
01/27/23	Kara B. Hendricks	Attention to emails regarding Via Regina sale and stipulation and correspond with C. Fronk regarding same;	0.20	96.05
01/27/23	Kara B. Hendricks	Review and finalize stipulations for Beasley South Lake Tahoe property and correspond with C. Fronk regarding same;	0.20	96.05
01/30/23	Kyle Ewing	Email communication with D. Zaro (AM) and J. Hall (AFS) re: comments/revisions to motion to employ Aitheras and declaration of J. Friend in support of the same	0.10	34.00
01/30/23	Kyle Ewing	Weekly meeting with AFS, GT, and AM teams (rescheduled from last week) with G. Winkler, J. Hall, K. Hendricks (GT), D. Zaro (AM); and others, including discussion of	0.90	306.00
01/30/23	Kara B. Hendricks	Review email from C. Fronk and follow-up regarding filing of stipulation for South Lake Tahoe property; Forward signed order to J. McGraw and G. Winkler;	0.20	96.05
01/30/23	Kara B. Hendricks	Participate in meeting regarding pending case issues including forensic accounting, property sales, asset evaluation of businesses, document requests, pending motion and recover efforts (participants included G. Winkler, J. Hall, A. Deering, K. Ewing, D. Zaro, M. Pham);	0.80	384.20
01/30/23	Kara B. Hendricks	Review and revise quarterly status report;	1.60	768.40
01/30/23	Kara B. Hendricks	Respond to email from M. Cook regarding state court proceeding and M. Murphy issues;	0.10	48.03
01/31/23	Kyle Ewing	Review and revise motion to employ Aitheras (data hosting/eDiscovery) to address comments of D. Zaro; finalize the same in preparation for filing	1.40	476.00
01/31/23	Kyle Ewing	Email communication with L. Milstein (Aitheras), GT team, and AFS team re: uploading of data and documents received by GT to Aitheras's cloud database	0.20	68.00
01/31/23	Kara B. Hendricks	Attention to emails regarding sale of Ruffian property and foreclosure notice;	0.10	48.03
01/31/23	Kara B. Hendricks	Correspond with A. Deering regarding status report;	0.10	48.03
01/31/23	Kara B. Hendricks	Attention to emails from J. Hall and D. Zaro regarding document storage issues and related follow-up;	0.50	240.13

01/31/23	Kara B. Hendricks	Review emails and letter from G. Winkler regarding ORC holding issues;	0.10	48.03
Total Hours:			104.10	
Total Amount:				\$ 39,685.91

TIMEKEEPER SUMMARY FOR TASK CODE GW001,

ASSET ANALYSIS AND RECOVERY

Summary of Fees (Base Rates)

Timekeeper Name	Hours Billed	Base Rate	Total \$ Amount
Kara B. Hendricks	36.90	565.00	20,848.50
Kyle Ewing	40.50	400.00	16,200.00
Christian Spaulding	24.50	375.00	9,187.50
Amy L. Hershberger	0.50	340.00	170.00
Cynthia L. Ney	1.70	295.00	501.50
Totals:	104.10		\$ 46,907.50

Summary of Fees (Discounted Rates)

Timekeeper Name	Hours Billed	Average Discounted Rate	Total \$ Amount
Kara B. Hendricks	36.90	480.26	17,721.53
Kyle Ewing	40.50	340.00	13,770.00
Christian Spaulding	24.50	318.75	7,809.38
Amy L. Hershberger	0.50	175.00	87.50
Cynthia L. Ney	1.70	175.00	297.50
Totals:	104.10		\$ 39,685.91

TASK CODE: GW002 ASSET DISPOSITION

<u>DATE</u>	<u>TIMEKEEPER</u>	<u>DESCRIPTION</u>	<u>HOURS</u>	<u>AMOUNT</u>
01/11/23	Alison R. Weinberg-Fahey	Review and respond to correspondence; examine lease agreement; confirm termination requirements per lease; review statutory provisions; note additional follow up; follow up regarding termination of lis pendens; address open questions; examine termination details; coordinate signatures.	0.60	461.54
01/12/23	Michael F. Thomson	Analyze lis pendens termination documents related to Utah real property, and multiple email correspondence regarding same.	0.50	378.25
01/12/23	Alison R. Weinberg-Fahey	Review and respond to correspondence; determine additional follow up; examine feedback regarding lease termination; review statutes and notice details; address open questions; prepare follow up regarding notice requirements; examine no cause notice to vacate forms; provide forms to K. Hendricks.	0.80	615.40
01/12/23	Suzanne Williams	Review of emails from A. Weinberg-Fahey and K. Hendricks re signing and notarization of termination notices by Utah attorney; revise for notary jurat and prepare same for overnight delivery to Bonnie Moon at Stewart Title of Utah in Bountiful, Utah.	0.80	140.00
01/13/23	Alison R. Weinberg-Fahey	Review and respond to correspondence; determine additional follow up; examine feedback regarding lease termination; review statutes and notice details; address open questions; follow up with K. Hendricks regarding notice details and delivery requirements.	0.30	230.78
01/18/23	Alison R. Weinberg-Fahey	Review and respond to correspondence; determine additional follow up; examine feedback regarding lease termination; review statutes and notice details; address open questions.	0.10	76.93
			<hr/>	
			Total Hours:	3.10
			Total Amount:	\$ 1,902.90

TIMEKEEPER SUMMARY FOR TASK CODE GW002.

ASSET DISPOSITION

Summary of Fees (Base Rates)

<u>Timekeeper Name</u>	<u>Hours Billed</u>	<u>Base Rate</u>	<u>Total \$ Amount</u>
Michael F. Thomson	0.50	890.00	445.00
Alison R. Weinberg-Fahey	1.80	905.00	1,629.00
Suzanne Williams	0.80	300.00	240.00
Totals:	3.10		\$ 2,314.00

Summary of Fees (Discounted Rates)

<u>Timekeeper Name</u>	<u>Hours Billed</u>	<u>Average Discounted Rate</u>	<u>Total \$ Amount</u>
Michael F. Thomson	0.50	756.50	378.25
Alison R. Weinberg-Fahey	1.80	769.25	1,384.65
Suzanne Williams	0.80	175.00	140.00
Totals:	3.10		\$ 1,902.90

TASK CODE: GW004 CASE ADMINISTRATION

<u>DATE</u>	<u>TIMEKEEPER</u>	<u>DESCRIPTION</u>	<u>HOURS</u>	<u>AMOUNT</u>
01/09/23	Kara B. Hendricks	Attention to emails regarding retention of vendor to assist with electronic documents and correspond with K. Ewing regarding preparation of motion to employ;	0.10	48.03
01/09/23	Kara B. Hendricks	Correspond with A. Deering and J. del Castillo regarding litigation updates for status report;	0.10	48.03
01/12/23	Marc Rasich	Confer re release of lis pendens issues	0.50	403.75
01/25/23	Kara B. Hendricks	Review emails regarding Aitheras contract and follow-up with K. Ewing on motion to employ;	0.10	48.03
01/25/23	Kara B. Hendricks	Respond to email from A. Deering regarding status report and filing of investor list and provide litigation updates;	0.20	96.05
01/27/23	Kara B. Hendricks	Attention to updated investor list and prepare notice of in camera submittal to accompany same and coordinate efforts with A. Preibe and E. Escobar-Gaddi;	0.20	96.05
01/31/23	Kara B. Hendricks	Correspond with A. Deering and finalize status report;	0.20	96.05
Total Hours:			1.40	
Total Amount:				\$ 835.99

TIMEKEEPER SUMMARY FOR TASK CODE GW004,

CASE ADMINISTRATION

Summary of Fees (Base Rates)

<u>Timekeeper Name</u>	<u>Hours Billed</u>	<u>Base Rate</u>	<u>Total \$ Amount</u>
Kara B. Hendricks	0.90	565.00	508.50
Marc Rasich	0.50	950.00	475.00
Totals:	1.40		\$ 983.50

Summary of Fees (Discounted Rates)

<u>Timekeeper Name</u>	<u>Hours Billed</u>	<u>Average Discounted Rate</u>	<u>Total \$ Amount</u>
Kara B. Hendricks	0.90	480.27	432.24
Marc Rasich	0.50	807.50	403.75
Totals:	1.40		\$ 835.99

TASK CODE: GW005 CLAIMS ADMINISTRATION AND OBJECTIONS

<u>DATE</u>	<u>TIMEKEEPER</u>	<u>DESCRIPTION</u>	<u>HOURS</u>	<u>AMOUNT</u>
01/03/23	Kara B. Hendricks	Review emails from A. Deering regarding Ruffian Road request and new documents obtained from Murphy;	0.10	48.03
01/03/23	Kara B. Hendricks	Correspond with J. delCastillo regarding stipulation for sale of Heber City property and update and finalize stipulation;	0.10	47.69
01/09/23	Kara B. Hendricks	Review outline for investor meeting and follow-up with A. Deering regarding questions and comments;	0.40	192.10
01/11/23	Kara B. Hendricks	Call with A. Deering and A. Priebe regarding compliance concerns and issues related to defendant stipulations;	0.60	288.15
01/11/23	Kara B. Hendricks	Review multiple emails regarding investor team and follow-up with IT team on rescheduling issues;	0.20	96.05
01/13/23	Kara B. Hendricks	Correspond with D. Hollingsworth regarding Judd stipulation and contact information and update G. Winkler;	0.30	144.08
01/19/23	Kara B. Hendricks	Review emails with US attorneys office regarding asset transfer concerns;	0.10	48.03
01/19/23	Kara B. Hendricks	Review and provide comments regarding investor questionnaire;	0.40	192.10
01/23/23	Kara B. Hendricks	Review emails regarding Huntington Beach stipulation and forward signed order to J. McGraw;	0.20	96.05
Total Hours:			2.40	
Total Amount:				\$ 1,152.28

TIMEKEEPER SUMMARY FOR TASK CODE GW005.

CLAIMS ADMINISTRATION AND OBJECTIONS

Summary of Fees (Base Rates)

<u>Timekeeper Name</u>	<u>Hours Billed</u>	<u>Base Rate</u>	<u>Total \$ Amount</u>
Kara B. Hendricks	2.40	565.00	1,356.00
Totals:	2.40		\$ 1,356.00

Summary of Fees (Discounted Rates)

<u>Timekeeper Name</u>	<u>Hours Billed</u>	<u>Average Discounted Rate</u>	<u>Total \$ Amount</u>
Kara B. Hendricks	2.40	480.12	1,152.28
Totals:	2.40		\$ 1,152.28

TASK CODE: GW011 STATUS REPORTS

<u>DATE</u>	<u>TIMEKEEPER</u>	<u>DESCRIPTION</u>	<u>HOURS</u>	<u>AMOUNT</u>
01/31/23	Kyle Ewing	Assist K. Hendricks with finalizing exhibits in support of the Receiver's status report in preparation for filing the same	0.10	34.00
			Total Hours:	0.10
			Total Amount:	\$ 34.00

TIMEKEEPER SUMMARY FOR TASK CODE GW011,

STATUS REPORTS

Summary of Fees (Base Rates)

<u>Timekeeper Name</u>	<u>Hours Billed</u>	<u>Base Rate</u>	<u>Total \$ Amount</u>
Kyle Ewing	0.10	400.00	40.00
Totals:	0.10		\$ 40.00

Summary of Fees (Discounted Rates)

<u>Timekeeper Name</u>	<u>Hours Billed</u>	<u>Average Discounted Rate</u>	<u>Total \$ Amount</u>
Kyle Ewing	0.10	340.00	34.00
Totals:	0.10		\$ 34.00

TASK CODE: GW014 TAX ISSUES

<u>DATE</u>	<u>TIMEKEEPER</u>	<u>DESCRIPTION</u>	<u>HOURS</u>	<u>AMOUNT</u>
01/27/23	Kyle Ewing	Review and analyze Jager asset list; confer with K. Hendricks re: the same and conduct further analysis	0.40	136.00
			Total Hours:	0.40
			Total Amount:	\$ 136.00

TIMEKEEPER SUMMARY FOR TASK CODE GW014,

TAX ISSUES

Summary of Fees (Base Rates)

<u>Timekeeper Name</u>	<u>Hours Billed</u>	<u>Base Rate</u>	<u>Total \$ Amount</u>
Kyle Ewing	0.40	400.00	160.00
Totals:	0.40		\$ 160.00

Summary of Fees (Discounted Rates)

<u>Timekeeper Name</u>	<u>Hours Billed</u>	<u>Average Discounted Rate</u>	<u>Total \$ Amount</u>
Kyle Ewing	0.40	340.00	136.00
Totals:	0.40		\$ 136.00

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

<u>Timekeeper</u>	<u>Hours</u>	<u>Rate</u>	<u>Amount</u>
Kara B. Hendricks	40.20	565.00	22,713.00
Marc Rasich	0.50	950.00	475.00
Michael F. Thomson	0.50	890.00	445.00
Alison R. Weinberg-Fahey	1.80	905.00	1,629.00
Kyle Ewing	41.00	400.00	16,400.00
Christian Spaulding	24.50	375.00	9,187.50
Amy L. Hershberger	0.50	340.00	170.00
Cynthia L. Ney	1.70	295.00	501.50
Suzanne Williams	0.80	300.00	240.00
	<hr/>	<hr/>	<hr/>
Totals:	111.50		\$ 51,761.00

Summary of Fees (Discounted Rates)

<u>Timekeeper</u>	<u>Hours</u>	<u>Rate</u>	<u>Amount</u>
Kara B. Hendricks	40.20	480.25	19,306.05
Marc Rasich	0.50	807.50	403.75
Michael F. Thomson	0.50	756.50	378.25
Alison R. Weinberg-Fahey	1.80	769.25	1,384.65
Kyle Ewing	41.00	340.00	13,940.00
Christian Spaulding	24.50	318.75	7,809.38
Amy L. Hershberger	0.50	175.00	87.50
Cynthia L. Ney	1.70	175.00	297.50
Suzanne Williams	0.80	175.00	140.00
	<hr/>	<hr/>	<hr/>
Totals:	111.50		\$ 43,747.08

Invoice No.: 1000315088
 Re: SEC v. Beasley (Geoff Winkler, Receiver)
 Matter No.: 209375.010100

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Description of Expenses Billed:

<u>DATE</u>	<u>DESCRIPTION</u>		<u>AMOUNT</u>
01/17/23	VENDOR: LexisNexis - ACH INVOICE#: 3094289160 DATE: 1/31/2023 Lexis Charges:Period January 01 - January 31 2023	\$	119.24
01/19/23	Maricopa County Recorders Fee	\$	30.00
	5360		
01/19/23	Maricopa County Recorders Fee	\$	30.00
	5360		
01/23/23	VENDOR: LexisNexis - ACH INVOICE#: 3094289160 DATE: 1/31/2023 Lexis Charges:Period January 01 - January 31 2023	\$	26.49
01/23/23	VENDOR: Nationwide Legal, LLC - 4527 INVOICE#: 00000052971 DATE: 1/31/2023 SPECIAL DELIVERY (IMMEDIATELY) - Stewart Title, 7251 W Lake Mead Boulevard Las Vegas NV on 1/23/23 Req'd by/for Escobar	\$	52.50
01/23/23	VENDOR: United Parcel Service, Inc.(UPS) - ACH INVOICE#: 00012823349 DATE: 1/28/2023 Trk'ing No. 1ZE0W1330196029245 / Next Day Air Commercial from Greenberg Traurig - Las Vegas Fred Cox to Escrow Of The West Lisa Williams on 1/23/2023 - 209375.010100	\$	15.22
01/24/23	VENDOR: LexisNexis - ACH INVOICE#: 3094289160 DATE: 1/31/2023 Lexis Charges:Period January 01 - January 31 2023	\$	66.24
01/24/23	WestlawNext Research by Christian Spaulding on 1/24/23 - Re: 209375.010100	\$	69.00
01/26/23	VENDOR: LexisNexis - ACH INVOICE#: 3094289160 DATE: 1/31/2023 Lexis Charges:Period January 01 - January 31 2023	\$	92.75
01/27/23	VENDOR: LexisNexis - ACH INVOICE#: 3094289160 DATE: 1/31/2023 Lexis Charges:Period January 01 - January 31 2023	\$	79.49
Total Expenses:		\$	580.93



Invoice No.: 1000315147
 File No. : 209375.010100
 Bill Date : May 15, 2023

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

Attn: Geoff Winkler

INVOICE

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

THIS INVOICE REPLACES INVOICE 1000246248 AND INVOICE 1000290396

	Total Fees:	\$	34,564.81
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Expenses:

Business Meals	-350.02	
Local Travel	11.00	
Service Company Charges	30.74	
Information and Research	32.43	

	Total Expenses:	\$	-275.85
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	Current Invoice:	\$	34,288.96
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	Previous Balance (see attached statement):	\$	154,969.02
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	Total Amount Due:	\$	189,257.98
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KBH:LC
 Tax ID: 13-3613083



Invoice No.: 1000315147
File No. : 209375.010100

REMITTANCE ADVICE

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

CLIENT NAME: WINKLER, GEOFF
FILE NUMBER: 209375.010100
INVOICE NUMBER: 1000315147*
BILLING PROFESSIONAL: Kara B. Hendricks

Current Invoice:	\$	34,288.96
Previous Balance:	\$	154,969.02
Total Amount Due:	\$	189,257.98

FOR YOUR CONVENIENCE, WIRE TRANSFER FUNDS TO:

For Wire Instructions:

Bank: WELLS FARGO BANK
ABA #: 121000248

For ACH Instructions:

Bank: WELLS FARGO BANK
ABA#: 063107513

CREDIT TO: GREENBERG TRAUIG DEPOSITORY ACCOUNT
ACCOUNT #: 2000014648663

PLEASE

REFERENCE: **CLIENT NAME:** WINKLER, GEOFF
FILE NUMBER: 209375.010100
INVOICE NUMBER: 1000315147*
BILLING
PROFESSIONAL: Kara B. Hendricks

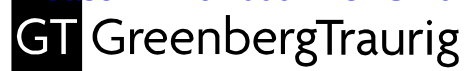
IF YOU WISH TO PAY BY CHECK PLEASE REMIT TO THE ADDRESS BELOW:

Greenberg Traurig
PO Box 936769
ATLANTA GA 31193-6769

Wire fees may be assessed by your bank.

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

KBH:LC
Tax ID: 13-3613083

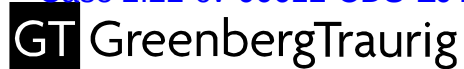


Invoice No. : 1000315147
File No. : 209375.010100

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

KBH:LC

Tax ID: 13-3613083



Invoice No. : 1000315147
 File No. : 209375.010100

Account Statement

<u>Date</u>	<u>Invoice #</u>	<u>Fees Due</u>	<u>Expenses Due</u>	<u>Other Due</u>	<u>Total Due</u>
07/19/22	1000035547	16,627.52	0.00	0.00	16,627.52
10/03/22	1000096060	12,029.69	0.00	0.00	12,029.69
11/09/22	1000142381	16,674.86	0.00	0.00	16,674.86
11/09/22	1000142507	8,666.16	0.00	0.00	8,666.16
02/14/23	1000224348	14,644.91	0.00	0.00	14,644.91
02/14/23	1000224438	12,682.94	0.00	0.00	12,682.94
02/14/23	1000224498	11,834.06	0.00	0.00	11,834.06
05/11/23	1000312069	60,596.93	1,211.95	0.00	61,808.88
	Totals:	\$ 153,757.07	\$ 1,211.95	\$ 0.00	\$ 154,969.02

KBH:LC

Tax ID: 13-3613083

Description of Professional Services Rendered:

TASK CODE: GW001 ASSET ANALYSIS AND RECOVERY

<u>DATE</u>	<u>TIMEKEEPER</u>	<u>DESCRIPTION</u>	<u>HOURS</u>	<u>AMOUNT</u>
02/01/23	Kara B. Hendricks	Attention to emails from J. McGraw and G. Winkler regarding Lucerene closing and email E. Dobberstein to discuss his clients demands;	0.50	240.13
02/01/23	Kara B. Hendricks	Respond to email form L. Maningo regarding Seybert;	0.10	48.03
02/02/23	Kara B. Hendricks	Review and relay compromise offer from E. Dobberstein to G. Winkler and correspond regarding same (.8); Follow-up with E. Dobberstein via email and phone to try and facilitate a resolution (.2).	1.00	480.25
02/02/23	Kara B. Hendricks	Telephone call with L. Maningo regarding Denny Seybert matters;	0.30	144.08
02/02/23	Kara B. Hendricks	Attention to emails from E. Dobberstein and J. McGraw regarding Lucerene property and fees and review case law and receivership order (1.8); Telephone call with G. Winkler to discuss options (.2); prepare detailed email to E. Dobberstein regarding proposal (.5); Telephone call with E. Dobberstein regarding same (.1);	2.60	1,248.65
02/02/23	Kara B. Hendricks	Telephone call with J. McGraw regarding interest issue with South Lake Tahoe;	0.20	96.05
02/02/23	Christian Spaulding	Evaluate Kamille Dean Reply in Support of Objection to Magistrate 12-29-22 Order and email to team regarding the lack of merit in the same.	0.70	223.12
02/03/23	Kyle Ewing	Email communication with K. Hendricks re: Court's minute order(s) setting K. Dean's objections for hearing during monthly status conference	0.10	34.00
02/03/23	Kyle Ewing	Email communication with AFS (M. Chavez and J. Hall) re: Chavez's analysis of documents produced by Grigsby and missing items; confer with K. Hendricks re: approach to the same	0.60	204.00
02/03/23	Kyle Ewing	Conference with K. Hendricks re: Ruffian Beasley property buyer's purported cancellation of sale agreement and options for approaching the same	0.20	68.00
02/03/23	Kyle Ewing	Email communication with J. Hall re: providing GT circulation emails to Receiver and his team	0.10	34.00
02/03/23	Kara B. Hendricks	Review email from A. Deering and G. Winkler regarding investor information;	0.10	48.03
02/03/23	Kara B. Hendricks	Review email from E. Dobberstein; Follow-up with G. Winkler and J. McGraw	0.30	144.08

02/03/23	Kara B. Hendricks	regarding Lucerene closing; Attention to email and documents from A. Deering regarding buyer communication regarding Ruffian/Hammer property and related review and follow-up;	0.30	144.08
02/03/23	Kara B. Hendricks	Correspond with K. Ewing regarding Dean reply and upcoming hearing;	0.10	48.03
02/03/23	Kara B. Hendricks	Follow-up regarding A. Deering subpoena request for SND LLC including online corporate records search and outlining information needed; Request C. Ney and C. Spaulding prepare same;	0.20	96.05
02/06/23	Kyle Ewing	Email communication with K. Hendricks and GT staff re: access to dropbox and effort to collect documents to be uploaded to the same (.1), email communication with AFS and Aitheras in connection with the same (.2), review draft letter to AFS re: cloud storage of sensitive data (.3)	0.60	204.00
02/06/23	Kyle Ewing	Email communication with K. Dean and M. Jarosak re: next week's hearing on K. Deans objections/appeals of the magistrate judge's rulings	0.30	102.00
02/06/23	Kyle Ewing	Review/analyze email from D. Clukey re: privacy concerns for C. Rohner and S. Johnson documents; email communication with K. Hendricks re: the same; draft response to Clukey in connection with the same	0.80	272.00
02/06/23	Kara B. Hendricks	Call with G. Winkler, A. Deering and Realtor regarding issues emerging regarding Beasley property sales;	0.40	192.10
02/06/23	Kara B. Hendricks	Correspond via email with K. Dean regarding hearing;	0.10	48.03
02/06/23	Kara B. Hendricks	Review sale documents and cancellation notice relating to Ruffian and Hammer property and correspond with A. Deering and G. Winkler regarding same;	0.50	240.13
02/06/23	Kara B. Hendricks	Review emails and information from J. Humphries;	0.10	48.03
02/06/23	Kara B. Hendricks	Review email and documents from L. Jeffery;	0.10	48.03
02/06/23	Kara B. Hendricks	Prepare detailed email to C. Fronk regarding pending questions regarding defendants (Rhoner, Johnson, Madsen, Murphy, Seybert) and requests received regarding same;	0.40	192.10
02/06/23	Kara B. Hendricks	Follow-up regarding tech issues and storage of documents;	0.10	48.03
02/06/23	Kara B. Hendricks	Attention to information received from C. Fronk regarding Rhoner, Johnson, Madsen, Murphy, Seybert, update A. Priebe and follow-up regarding next steps;	0.60	288.15
02/06/23	Cynthia L. Ney	Preparation of subpoena and document request directed to SND LLC (.4); communications with K.Hendricks regarding same (.1).	0.50	87.50

02/07/23	Kyle Ewing	Review email communications between S. Schone (EcoBattery COO) and J. Hall (AFS) re: status of EcoBattery financials; telephonic conference with K. Hendricks re: options for seeking EcoBattery receivership, injunction, or other equitable relief	0.50	170.00
02/07/23	Kyle Ewing	Conference with J. McGraw (AFS) re: next week's status conference/hearing with the Court and ongoing and upcoming issues with the sales of real property and certain parties to the transactions	0.20	68.00
02/07/23	Kara B. Hendricks	Telephone call with M. Cook regarding M. Murphy documents, stipulation, and available assets (.5), follow-up with C. Ney and request assistance with document review (.2)	0.70	336.18
02/07/23	Kara B. Hendricks	Correspond with G. Winkler regarding expected funds from R. Madsen counsel and sale of South Lake Tahoe property;	0.10	48.03
02/07/23	Kara B. Hendricks	Correspond with K. Ewing regarding defendant request for protective order over tax records and legal authority supporting same and respond to email from D. Clukey regarding same;	0.30	144.08
02/07/23	Kara B. Hendricks	Review emails and revise correspondence to G. Winkler regarding Box storage;	0.20	96.05
02/07/23	Kara B. Hendricks	Attention to email from B. Manislla regarding Lucerene property and follow-up with J. McGraw regarding closing;	0.20	96.05
02/07/23	Kara B. Hendricks	Review emails and documents regarding Eco Battery issues and confer with K. Ewing regarding prior research and potential next steps;	0.50	240.13
02/08/23	Kyle Ewing	Plan and prepare for next week's hearing on K. Dean's appeals of magistrate judge orders (.8), confer with K. Hendricks re: previous research associated with the same and follow-up research re same (.4)	1.20	408.00
02/08/23	Kyle Ewing	Begin reviewing timeline and analysis of EcoBattery issues re: fraud/misstatement of inventory and unlawful insider transactions provided by M. Pham (AM) (.3), continue reviewing recent email communication from EcoBttery re: inventory accounting issues and confer with K. Hendricks re: the same (.2)	0.50	170.00
02/08/23	Kara B. Hendricks	Respond to emails from A. Priebe and A. Deering regarding communication with investors and order compliance;	0.20	96.05
02/08/23	Kara B. Hendricks	Call with C. Fronk regarding Murphy stipulation and property issues;	0.30	144.08
02/08/23	Kara B. Hendricks	Respond to email from K. Dean regarding upcoming hearing;	0.20	96.05
02/08/23	Kara B. Hendricks	Attention to minute order regarding status hearing and forward to K. Dean;	0.10	48.03
02/08/23	Kara B. Hendricks	Telephone call to US Marshall's office	0.40	192.10

		regarding pick-up of seized items and follow-up with G. Winkler regarding procedural issues;		
02/08/23	Kara B. Hendricks	Respond to email from C. Fronk regarding Murphy;	0.10	48.03
02/08/23	Kara B. Hendricks	Review Eco Battery documents and follow-up with M. Farrell regarding next steps;	0.30	144.08
02/09/23	Kyle Ewing	Continue reviewing timeline and analysis of EcoBattery issues re: fraud/misstatement of inventory and unlawful insider transactions provided by M. Pham (AM) (.8); confer with K. Hendricks (GT) re: the same in preparation for today's call with AFS and AM (.3); follow-up with K. Hendricks re: assignments of various interests (.2)	1.30	442.00
02/09/23	Kyle Ewing	Weekly coordination call with AFS, GT, and AM, including discussion of next week's status conference, ongoing efforts to sell real property, issues with S. Jager and J. Jongeward investments in EcoBattery and other litigation claims for the Receiver's pursuit (.7), follow-up call re: EcoBattery with K. Hendricks, AFS (G. Winkler and J. Hall), and AM (M. Farrell and M. Pham) (.4)	1.10	374.00
02/09/23	Pete J. Georgis	Review and revise assignment of membership interest (.5), analyze and prepare correspondence re transfer of voting rights (.3)	0.80	367.20
02/09/23	Kara B. Hendricks	Correspond with C. Ney regarding transfer of documents and materials to platform for team access (.1), review information from M. Barkhanoy regarding same and follow-up with C. Ney (.3)	0.30	144.08
02/09/23	Kara B. Hendricks	Review proposed Murphy stipulation and discuss with G. Winkler (.3), revise stipulation and send to C. Fronk with comments (.4)	0.70	336.18
02/09/23	Kara B. Hendricks	Review SND subpoena and follow-up with G. Winkler to facilitate finalizing same;	0.20	96.05
02/09/23	Kara B. Hendricks	Review documents from M. Murphy and follow-up with M. Cook regarding additional information needed;	0.50	240.13
02/09/23	Kara B. Hendricks	Prepare assignment of Jager's interest in Eco Battery and outline issues for further consideration to G. Winkler including follow-up on loans made to Eco Battery by Defendants and/or related entities incorporate comments from corporate team into assignment;	2.40	1,152.60
02/09/23	Kara B. Hendricks	Review time line regarding Eco Battery transaction and assessment of potential claims;	0.20	96.05
02/09/23	Cynthia L. Ney	Communications with K.Hendricks regarding loading of documentation into cloud based service.	0.20	35.00

02/09/23	Cynthia L. Ney	Review Mark Murphy documentation and compilation of materials for K.Hendricks review.	0.40	70.00
02/09/23	Christian Spaulding	Evaluate draft of Subpoena to SND LLC and revise exhibit 1 thereto.	0.30	95.62
02/13/23	Kyle Ewing	Continue planning and preparing for Wednesday's hearing on K. Dean motions and status check with K. Hendricks	0.10	34.00
02/13/23	Kara B. Hendricks	Review various emails regarding tax records from D. Clukey for Rohner, Johnson and Prestige and follow-up;	0.10	48.03
02/13/23	Kara B. Hendricks	Attention to email regarding Ruffian property buyer and fees and follow-up with A. Deering and D. Zaro;	0.30	144.08
02/13/23	Kara B. Hendricks	Identify documents to review in preparation for hearing on Dean Objections/appeals and request E. Escobar-Gaddi compile same for review and hearing preparation;	0.20	95.71
02/13/23	Kara B. Hendricks	Follow-up with G. Winkler regarding obtaining documents and assets seized by FBI;	0.30	144.08
02/13/23	Kara B. Hendricks	Review notice of remand and voluntary dismissal of state court receivership proceeding and respond to email from S. Fagin regarding same;	0.20	96.05
02/13/23	Kara B. Hendricks	Evaluate issues relating to turnover of funds held in accounts by relief defendants (JL2 Investments and Triple Threat) and correspond with J. delCastillo regarding same;	0.20	96.05
02/13/23	Kara B. Hendricks	Initial review of loan information regarding Ecobattery and request Z. Jordan's assistance with assignments of interest and provide case background to documents to assist with same;	0.40	192.10
02/13/23	Kara B. Hendricks	Review emails from M. Murphy counsel including 1099s from J&J and forward to A. Deering and J. Hall;	0.10	48.03
02/13/23	Kara B. Hendricks	Telephone call with Jeff from US Marshall service regarding release of Judd assets and follow-up with G. Winkler regarding procedure and time frame for same;	0.30	144.08
02/13/23	Kara B. Hendricks	Return call to M. Cook regarding M. Murphy assets (.2); Review and respond to email from C. Fronk regarding same (.1);	0.30	144.08
02/13/23	Cynthia L. Ney	Analysis, compilation and forwarding of materials received regarding defendants Rohner and Johnson to A.Deering and G.Winkler.	0.30	52.50
02/14/23	Kyle Ewing	Review K. Hendrick's draft form letter to defendants re: the receiver's intention of securing assets held by those defendants; telephonic conference re: comments to the same	0.30	102.00
02/14/23	Kara B. Hendricks	Attention to email from M. Cook regarding Murphy assets and stipulation (.1); Review	0.20	96.05

02/14/23	Kara B. Hendricks	stipulation and correspondence from C. Fronk and authorize filing of same (.1); Review documents and meet with Z. Jordan and provide context and documents for evaluation regarding Eco Battery loan assignments;	0.60	288.15
02/14/23	Kara B. Hendricks	Attention to emails from G. Winkler regarding asset pick-up and Ruffian fees;	0.10	48.03
02/14/23	Kara B. Hendricks	Review pleadings and prepare for hearing regarding Dean motions;	1.20	576.30
02/14/23	Kara B. Hendricks	Prepare draft form letter to send to defendants to facilitate additional turnover and incorporate proposed revisions from K. Ewing (.9); Correspond with G. Winkler regarding same (.1);	1.00	480.25
02/14/23	Kara B. Hendricks	Review and revise letter for Receiver to send to defendants regarding production of monthly bank statements;	0.50	240.13
02/14/23	Kara B. Hendricks	Attention to emails from G. Winkler regarding assets to be picked up from US Marshall's office and request C. Ney's assistance with list of items seized;	0.50	240.13
02/14/23	Cynthia L. Ney	Analysis of file and compilation of materials for K.Hendricks regarding Judd seized assets (.1).	0.10	17.50
02/15/23	Kyle Ewing	Confer with K. Hendricks re: results of today's meeting with FBI for turnover of assets (.2), final preparation with K. Hendricks for her appearance at today's hearing on K. Dean motions for reconsideration and follow-up re: results (.2)	0.40	136.00
02/15/23	Kyle Ewing	Review draft petition for remission requested by FBI; confer with K. Hendricks re: the same	0.40	136.00
02/15/23	Kara B. Hendricks	Review payment proposal from K. Dean and forward to G. Winkler;	0.10	48.03
02/15/23	Kara B. Hendricks	Review email from M. Rasich regarding Utah research request and follow-up with C. Spaulding and provide background relating to information needed;	0.30	144.08
02/15/23	Kara B. Hendricks	Attention to email communication from K. Dean and forward to G. Winkler for consideration;	0.10	48.03
02/15/23	Kara B. Hendricks	Correspond with C. Fronk regarding meeting prior to hearing for discussion;	0.20	96.05
02/15/23	Kara B. Hendricks	Review email from Utah counsel and request C. Spaulding assist with research needs to facilitate EcoBattery transfer;	0.10	48.03
02/15/23	Kara B. Hendricks	Correspond with G. Winkler regarding information requested by FBI to facilitate turnover of additional assets;	0.10	48.03
02/15/23	Kara B. Hendricks	Meet G. Winkler and US Marshall to transfer Judd items seized by FBI;	2.60	1,248.65
02/15/23	Kara B. Hendricks	Prepare request for turnover of Beasley property forfeited to FBI;	0.80	384.20
02/15/23	Kara B. Hendricks	Update C. Fronk and M. Welsh regarding	0.40	192.10

02/15/23	Cynthia L. Ney	asset pick-up and case issues; Analysis and electronic organization of new documents received from defendant Humphries.	0.20	35.00
02/16/23	Kyle Ewing	Weekly telephonic conference with AFS, GT, and AM teams re: various issues, including yesterday's status check and related rulings from the Court, continued efforts to secure and dispose of real estate and other assets; forensic accounting; and ancillary litigation and other issues related to investments and other transfers of receivership funds under investigation	0.90	306.00
02/16/23	Kara B. Hendricks	Follow-up with Z. Jordan regarding Eco Battery loan assignment;	0.10	48.03
02/16/23	Kara B. Hendricks	Correspond with J. Hall regarding obtaining additional tax records from defendants;	0.10	48.03
02/16/23	Kara B. Hendricks	Telephone call with G. Winkler regarding EcoBattery concerns and discuss with C. Spaulding for further analysis;	0.30	144.08
02/16/23	Kara B. Hendricks	Prepare response to Dean email and settlement proposal;	0.30	144.08
02/16/23	Kara B. Hendricks	Correspond with A. Deering regarding Hurricane real estate options and follow-up with T. Miller regarding potential use;	0.20	96.05
02/16/23	Kara B. Hendricks	Work with E. Escobar-Gaddi on submittal to FBI for return of Beasley seized assets;	0.30	144.08
02/16/23	Christian Spaulding	Evaluate Utah authority pertaining to transfer of membership interests, including right to assert claims on behalf of assignor as it relates to Jager's interest in Eco Battery.	2.30	733.15
02/16/23	Christian Spaulding	Revise draft of assignment of interest in Eco Battery following research and confer with K. Hendricks regarding the same.	0.50	159.37
02/17/23	Kara B. Hendricks	Review minute order and follow-up with AFS team regarding employment of Aitheras;	0.10	48.03
02/17/23	Kara B. Hendricks	Follow-up with J. Hall regarding communication with defendants regarding tax issues;	0.10	48.03
02/17/23	Kara B. Hendricks	Correspond with A. Deering regarding attorney retainers and request C. Ney's assistance with review of file records;	0.20	96.05
02/17/23	Kara B. Hendricks	Review updated information from T. Miller regarding Hurricane property value and respond to email from J. McGraw regarding Realtor plan;	0.20	96.05
02/17/23	Cynthia L. Ney	Analysis and electronic organization of discovery documentation from defendants for loading into box.com.	1.40	245.00
02/17/23	Cynthia L. Ney	Review file and communications with John Hall regarding email addresses for various defendants/counsel.	0.40	70.00
02/20/23	Kara B. Hendricks	Attention to emails from G. Winkler regarding EcoCapital visit (.2); Telephone	0.40	192.10

02/21/23	Kyle Ewing	call to discuss same (.2); Review/analyze court's orders granting motions to employ Aitheras and special litigation counsel	0.10	34.00
02/21/23	Kara B. Hendricks	Request C. Spaulding's assistance with Grigsby meet and confer letter and get update from K. Ewing regarding review of information received for Grigsby and information needed;	0.30	144.08
02/21/23	Kara B. Hendricks	Telephone call with J. Freel and G. Winkler regarding EcoBattery/Eco Capital issues (.7); Follow-up with G. Winkler regarding same (.2);	0.90	432.23
02/21/23	Kara B. Hendricks	Review email from J. Freel regarding meeting to discuss Eco Capital/Eco Battery issues and correspond with G. Winkler regarding same;	0.10	48.03
02/21/23	Kara B. Hendricks	Review emails regarding attorney fees from Peters and Sellers;	0.10	48.03
02/21/23	Kara B. Hendricks	Correspond with Z. Jordan regarding EcoBattery loan assignments and review initial draft of same;	0.30	144.08
02/21/23	Kara B. Hendricks	Review subpoena to obtain Beasley bank records;	0.10	48.03
02/22/23	Kara B. Hendricks	Follow-up with M. Pham regarding Eco Battery loan analysis and correspond with Z. Jordan regarding loan documents;	0.30	144.08
02/22/23	Kara B. Hendricks	Attention to emails regarding EcoCapital meeting and follow-up with G. Winkler regarding same;	0.30	144.08
02/22/23	Kara B. Hendricks	Attention to record documents releasing lis pendens on Utah properties;	0.10	48.03
02/22/23	Kara B. Hendricks	Attention to email from L. Maningo regarding Seybert property and securing funds for the Receiver and follow-up with G. Winkler regarding same;	0.10	48.03
02/22/23	Kara B. Hendricks	Review emails from D. Zaro and A. Deering regarding sale of Hammer lot;	0.10	48.03
02/22/23	Cynthia L. Ney	Compilation, organization and electronic forwarding of documentation to vendor for eventual loading into Relativity.	1.30	227.50
02/23/23	Kara B. Hendricks	Participate in team call to discuss accounting, asset recovery efforts, entity investigations, asset investigation, contact with defendants and related issues (present were G. Winkler, J. Hall, A. Deering, D. Zaro, J. delCastillo, J. McGraw and others from AFS team);	0.60	288.15
02/23/23	Kara B. Hendricks	Confer with M. Shalmy and Z. Jordan regarding JL2 investment issues and information needed to determine next steps;	0.50	240.13
02/23/23	Kara B. Hendricks	Update letter to defendants regarding assets turnover, review data and work with C. Ney to finalize and personalize same;	0.50	240.13
02/23/23	Kara B. Hendricks	Attention to email from M. Pham with additional information regarding Eco	0.50	240.13

		Battery loans, review JL2 Investment Group formation documents and follow-up with G. Winkler regarding further analysis and next steps;		
02/24/23	Kara B. Hendricks	Review and respond to email from L. Maningo regarding Seybert property;	0.10	48.03
02/24/23	Cynthia L. Ney	Preparation of letters and asset lists to various defendants (2.3); communications with K.Hendricks regarding same (.2).	2.50	437.50
02/27/23	Kyle Ewing	Conference with K. Hendricks re: upcoming tasks, including revision and finalization of letters to defendants re: securing outstanding assets; review email communications and draft letters in connection with the same	0.30	102.00
02/27/23	Kyle Ewing	Email communication with M. Pham (Allen Matkins) re: status of M. Murphy's state court action in connection with receiver's effort to withdraw notices of receivership from prior state court receiver; review state court filings/docket in connection with the same; review today's order filed by state court in response to M. Murphy's notice of remand/dismissal	0.40	136.00
02/27/23	Kara B. Hendricks	Follow-up with J. Jongeward regarding documents and information needed for Ecobattery loan analysis and talk to Z. Jordan regarding same;	0.30	144.08
02/27/23	Kara B. Hendricks	Attention to email and documents from L. Maningo regarding Horizon Ridge condo and follow-up with G. Winkler regarding next steps;	0.20	96.05
02/27/23	Kara B. Hendricks	Follow-up with G. Winkler and A. Deering regarding Jager trust and loan assignment and provide background;	0.20	96.05
02/27/23	Kara B. Hendricks	Correspond with A. Deering regarding investor communication and concerns regarding sale of Hammer property;	0.10	48.03
02/27/23	Kara B. Hendricks	Attention to email and documents from M. Cook regarding notice of remand and dismissal filed in state court action; Review state court docket and follow-up with G. Winkler regarding next steps;	0.30	144.08
02/27/23	Kara B. Hendricks	Review minute order issued in Murphy state court action and follow-up with M. Cook (.2); Telephone call to and email W. Frazier regarding dismissal of state court proceeding (.3); Update M. Cook on agreement from Eco battery to sign stipulation to dismiss state court proceedings (.1);	0.60	288.15
02/28/23	Kara B. Hendricks	Correspond with Z. Jordan regarding JL2 Investment corporate filings;	0.10	48.03
02/28/23	Kara B. Hendricks	Review stipulations and supporting exhibits for the sale of Ruffian/Hammer property and 8 Twisted Rock and follow-up with A. Deering and forward to C.	0.50	240.13

02/28/23	Kara B. Hendricks	Fronk for review and comment; Prepare letters to defendants for turnover and follow-up with G. Winkler to clarify information as needed, letters include Defendant including Humphries (.3); Beasley (.3); Rosegreen (.2); Jager (.2); R. Madsen (.2); Judd (.3); Murphy (.2); Jeffrey (.2); Jenne (.2); C. Madsen (.2);	2.30	1,104.58
02/28/23	Cynthia L. Ney	Finalize and forwarding of letters to various defendants regarding securing and turnover of receivership property (.8); communications with K.Hendricks regarding same (.1).	0.90	157.50
02/28/23	Christian Spaulding	Evaluate transcript from December 16, 2022 hearing on Motion to Compel Re: Grigsby and P. Beasley. Review documents produced in response to court order.	3.20	1,020.00
02/28/23	Christian Spaulding	Draft letter to A. Grigsby regarding insufficient document production.	1.90	605.62
Total Hours:			67.20	
Total Amount:				\$ 26,856.79

TIMEKEEPER SUMMARY FOR TASK CODE GW001.

ASSET ANALYSIS AND RECOVERY

Summary of Fees (Base Rates)

<u>Timekeeper Name</u>	<u>Hours Billed</u>	<u>Base Rate</u>	<u>Total \$ Amount</u>
Pete J. Georgis	0.80	540.00	432.00
Kara B. Hendricks	38.90	565.00	21,978.50
Kyle Ewing	10.40	400.00	4,160.00
Christian Spaulding	8.90	375.00	3,337.50
Cynthia L. Ney	8.20	295.00	2,419.00
Totals:	67.20		\$ 32,327.00

Summary of Fees (Discounted Rates)

<u>Timekeeper Name</u>	<u>Hours Billed</u>	<u>Average Discounted Rate</u>	<u>Total \$ Amount</u>
Pete J. Georgis	0.80	459.00	367.20
Kara B. Hendricks	38.90	480.25	18,681.71
Kyle Ewing	10.40	340.00	3,536.00
Christian Spaulding	8.90	318.75	2,836.88
Cynthia L. Ney	8.20	175.00	1,435.00
Totals:	67.20		\$ 26,856.79

TASK CODE: GW004 CASE ADMINISTRATION

<u>DATE</u>	<u>TIMEKEEPER</u>	<u>DESCRIPTION</u>	<u>HOURS</u>	<u>AMOUNT</u>
02/06/23	Cynthia L. Ney	Preparation of letter to G.Winkler regarding use of cloud based services for case (.3); communications with K.Hendricks regarding same (.1).	0.40	70.00
02/09/23	Kara B. Hendricks	Participate in call with Receivership team (G. Winkler, J. Hall, K. Ewing, M. Pham, M, Ferrell, A. Deering, J. McGraw) and discuss status of forensic accounting, asset recover, expected transfers, business evaluations and potential litigation regarding same;	1.00	480.25
02/13/23	Kara B. Hendricks	Request M. Rasich assistance in evaluating assignment of Utah LLC rights and assignability of tort claims under Utah law;	0.40	192.10
02/15/23	Kara B. Hendricks	Prepare for status check and hearing on Dean Motions (2.7); Attend status hearing (1.5); Debrief with G. Winkler and team and discuss next steps and priorities (.5);	4.20	2,017.05
02/16/23	Kara B. Hendricks	Attention to email from K. Works regarding communication with Humphries;	0.30	144.08
02/16/23	Kara B. Hendricks	Participate in coordination call and review an update regarding forensic accounting, asset recovery (homes sales and turnover), bank records, ancillary proceedings, defendant concerns and related items (G. Winkler, A. Deering, J. Hall, J. del Castillo, D. Zaro, K. Ewing participants);	0.80	384.20
02/17/23	Cynthia L. Ney	Analysis and electronic organization of case files including case memos(.9); communications with team regarding same (.1).	1.00	175.00
02/22/23	Kara B. Hendricks	Respond to C. Ney inquires regarding documents storage and review related emails with Aitheras;	0.20	96.05
02/22/23	Kara B. Hendricks	Attention to order approving status report and continued work of receiver and order approving employment of special counsel;	0.30	144.08
02/23/23	Kara B. Hendricks	Attention to emails from L. Milstein and J. Hall regarding data storage plan and related follow-up;	0.10	48.03
02/27/23	Kara B. Hendricks	Begin review of Safeguard agreement and follow-up with J. Hall regarding same;	0.40	192.10
Total Hours:			9.10	
Total Amount:				\$ 3,942.94

TIMEKEEPER SUMMARY FOR TASK CODE GW004,

CASE ADMINISTRATION

Summary of Fees (Base Rates)

<u>Timekeeper Name</u>	<u>Hours Billed</u>	<u>Base Rate</u>	<u>Total \$ Amount</u>
Kara B. Hendricks	7.70	565.00	4,350.50
Cynthia L. Ney	1.40	295.00	413.00
Totals:	9.10		\$ 4,763.50

Summary of Fees (Discounted Rates)

<u>Timekeeper Name</u>	<u>Hours Billed</u>	<u>Average Discounted Rate</u>	<u>Total \$ Amount</u>
Kara B. Hendricks	7.70	480.25	3,697.94
Cynthia L. Ney	1.40	175.00	245.00
Totals:	9.10		\$ 3,942.94

TASK CODE: GW005 CLAIMS ADMINISTRATION AND OBJECTIONS

<u>DATE</u>	<u>TIMEKEEPER</u>	<u>DESCRIPTION</u>	<u>HOURS</u>	<u>AMOUNT</u>
02/06/23	Kara B. Hendricks	Attention to email from J. McGraw regarding closing issue with Lucerene and follow-up via email and voice message to E. Dobberstein (.3); Return call to Debora at Dobberstein's office (.1); Follow-up with J. McGraw regarding next steps (.2);	0.60	288.15
02/14/23	Kara B. Hendricks	Review documents showing assets of individual defendants and accounting of funds to defendants from IOLTA;	0.80	384.20
02/21/23	Kara B. Hendricks	Attention to emails from L. Maningo regarding Seybert liability and securing funds and related follow-up;	0.30	144.08
02/21/23	Kara B. Hendricks	Attention to email from A. Deering regarding Hammer stipulation and review, revise and circulate same;	0.80	384.20
02/24/23	Kara B. Hendricks	Review and revise letter to investors with focus on disclaimer language regarding questionnaire;	0.20	96.05
Total Hours:			2.70	
Total Amount:				\$ 1,296.68

TIMEKEEPER SUMMARY FOR TASK CODE GW005.

CLAIMS ADMINISTRATION AND OBJECTIONS

Summary of Fees (Base Rates)

<u>Timekeeper Name</u>	<u>Hours Billed</u>	<u>Base Rate</u>	<u>Total \$ Amount</u>
Kara B. Hendricks	2.70	565.00	1,525.50
Totals:	2.70		\$ 1,525.50

Summary of Fees (Discounted Rates)

<u>Timekeeper Name</u>	<u>Hours Billed</u>	<u>Average Discounted Rate</u>	<u>Total \$ Amount</u>
Kara B. Hendricks	2.70	480.25	1,296.68
Totals:	2.70		\$ 1,296.68

TASK CODE: GW010 DATA ANALYSIS

<u>DATE</u>	<u>TIMEKEEPER</u>	<u>DESCRIPTION</u>	<u>HOURS</u>	<u>AMOUNT</u>
02/13/23	Zaniah A. Jordan	Analyze loan agreement between Jager Family Trust and Eco Battery, LLC and loan agreement and promissory note between JL2 Investments Group, LLC and Eco Battery, LLC in order to determine who the appropriate creditor is in anticipation of assignment to the receiver	1.50	471.75
02/13/23	Zaniah A. Jordan	Strategy meeting with Ms. Hendricks regarding loans made to Eco Battery, LLC and the necessity for an assignment of the interest in the subject loans to the receiver	0.40	125.80
02/14/23	Zaniah A. Jordan	Analyze entity documents of JI2 Investment Group, LLC and Eco Battery, LLC in anticipation of drafting assignment agreement (.5), draft assignment and assumption agreement and corresponding resolutions (1.4)	1.90	597.55
02/16/23	Zaniah A. Jordan	Draft assignment of loan for both loans to Eco Battery, LLC by the Jager Family Trust and JL2 Investment Group, LLC	1.50	471.75
02/21/23	Zaniah A. Jordan	Incorporate edits to the assignment of loan agreements in light of discussion with Mr. Shalmy	1.10	345.95
02/22/23	Zaniah A. Jordan	Research regarding source of loan funds to Eco Battery, LLC; legal research regarding how to appropriately classify loan funds when directly deposited by individual members; draft correspondence regarding the same	0.50	157.25
02/24/23	Zaniah A. Jordan	Strategy discussion with Ms. Rohrbach regarding status of JI2 Investment Group, LLC; research regarding business operating as an LLC but not registered as an LLC with the secretary of state; draft correspondence regarding the same	0.30	94.35
Total Hours:			7.20	
Total Amount:				\$ 2,264.40

TIMEKEEPER SUMMARY FOR TASK CODE GW010,

DATA ANALYSIS

Summary of Fees (Base Rates)

<u>Timekeeper Name</u>	<u>Hours Billed</u>	<u>Base Rate</u>	<u>Total \$ Amount</u>
Zaniah A. Jordan	7.20	370.00	2,664.00
Totals:	7.20		\$ 2,664.00

Summary of Fees (Discounted Rates)

<u>Timekeeper Name</u>	<u>Hours Billed</u>	<u>Average Discounted Rate</u>	<u>Total \$ Amount</u>
Zaniah A. Jordan	7.20	314.50	2,264.40
Totals:	7.20		\$ 2,264.40

TASK CODE: GW014 TAX ISSUES

<u>DATE</u>	<u>TIMEKEEPER</u>	<u>DESCRIPTION</u>	<u>HOURS</u>	<u>AMOUNT</u>
02/02/23	Kyle Ewing	Research re: Beasley Tahoe property lender's claim that it is entitled to default interest purportedly assessed after appointment of receiver; review email communications, order, and loan agreement in connection with the same and confer with K. Hendricks re: strategy for addressing the same	0.60	204.00
			Total Hours:	0.60
			Total Amount:	\$ 204.00

TIMEKEEPER SUMMARY FOR TASK CODE GW014,

TAX ISSUES

Summary of Fees (Base Rates)

<u>Timekeeper Name</u>	<u>Hours Billed</u>	<u>Base Rate</u>	<u>Total \$ Amount</u>
Kyle Ewing	0.60	400.00	240.00
Totals:	0.60		\$ 240.00

Summary of Fees (Discounted Rates)

<u>Timekeeper Name</u>	<u>Hours Billed</u>	<u>Average Discounted Rate</u>	<u>Total \$ Amount</u>
Kyle Ewing	0.60	340.00	204.00
Totals:	0.60		\$ 204.00

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

<u>Timekeeper</u>	<u>Hours</u>	<u>Rate</u>	<u>Amount</u>
Pete J. Georgis	0.80	540.00	432.00
Kara B. Hendricks	49.30	565.00	27,854.50
Kyle Ewing	11.00	400.00	4,400.00
Zaniah A. Jordan	7.20	370.00	2,664.00
Christian Spaulding	8.90	375.00	3,337.50
Cynthia L. Ney	9.60	295.00	2,832.00
Totals:	86.80		\$ 41,520.00

Summary of Fees (Discounted Rates)

<u>Timekeeper</u>	<u>Hours</u>	<u>Rate</u>	<u>Amount</u>
Pete J. Georgis	0.80	459.00	367.20
Kara B. Hendricks	49.30	480.25	23,676.33
Kyle Ewing	11.00	340.00	3,740.00
Zaniah A. Jordan	7.20	314.50	2,264.40
Christian Spaulding	8.90	318.75	2,836.88
Cynthia L. Ney	9.60	175.00	1,680.00
Totals:	86.80		\$ 34,564.81

Invoice No.: 1000315147
 Re: SEC v. Beasley (Geoff Winkler, Receiver)
 Matter No.: 209375.010100

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Description of Expenses Billed:

<u>DATE</u>	<u>DESCRIPTION</u>		<u>AMOUNT</u>
12/16/22	VENDOR: Hendricks, Kara B. INVOICE#: 1361 DATE: 2/9/2023	\$	34.19
12/16/22	VENDOR: Hendricks, Kara B. INVOICE#: 1361 DATE: 2/9/2023	\$	2.00
12/16/22	VENDOR: Hendricks, Kara B. INVOICE#: 1361 DATE: 2/9/2023	\$	3.00
12/16/22	VENDOR: Hendricks, Kara B. INVOICE#: 1361 DATE: 2/9/2023	\$	4.00
01/17/23	VENDOR: Hendricks, Kara B. INVOICE#: 1361 DATE: 2/9/2023	\$	2.00
02/03/23	VENDOR: 24 Hour Express, LLC INVOICE#: 1215-1880 DATE: 2/3/2023 Delivery Service Stewart Tile of Utah	\$	30.74
02/09/23	Cancellation of: VENDOR: LexisNexis - ACH INVOICE#: 3094289160 DATE: 1/31/2023 Lexis Charges:Period January 01 - January 31 2023	\$	-92.75
02/09/23	Cancellation of: VENDOR: LexisNexis - ACH INVOICE#: 3094289160 DATE: 1/31/2023 Lexis Charges:Period January 01 - January 31 2023	\$	-79.49
02/09/23	Cancellation of: VENDOR: LexisNexis - ACH INVOICE#: 3094289160 DATE: 1/31/2023 Lexis Charges:Period January 01 - January 31 2023	\$	-119.24
02/09/23	Cancellation of: VENDOR: LexisNexis - ACH INVOICE#: 3094289160 DATE: 1/31/2023 Lexis Charges:Period January 01 - January 31 2023	\$	-26.49
02/09/23	Cancellation of: VENDOR: LexisNexis - ACH INVOICE#: 3094289160 DATE: 1/31/2023 Lexis Charges:Period January 01 - January 31 2023	\$	-66.24
02/16/23	VENDOR: LexisNexis - ACH INVOICE#: 3094353631 DATE: 2/28/2023 Lexis Charges Period: February 01 - February 28 2023	\$	32.43
	Total Expenses:	\$	-275.85



Invoice No. : 1000315185
File No. : 209375.010100
Bill Date : May 15, 2023

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

Attn: Geoff Winkler

INVOICE

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

THIS INVOICE REPLACES INVOICE 1000271876

Total Fees:	\$	45,156.86
Current Invoice:	\$	<u>45,156.86</u>
Previous Balance (see attached statement):	\$	154,969.02
Total Amount Due:	\$	<u><u>200,125.88</u></u>

KBH:LC
Tax ID: 13-3613083



Invoice No.: 1000315185
File No. : 209375.010100

REMITTANCE ADVICE

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

CLIENT NAME: WINKLER, GEOFF
FILE NUMBER: 209375.010100
INVOICE NUMBER: 1000315185*
BILLING PROFESSIONAL: Kara B. Hendricks

Current Invoice:	\$	45,156.86
Previous Balance:	\$	154,969.02
Total Amount Due:	\$	200,125.88

FOR YOUR CONVENIENCE, WIRE TRANSFER FUNDS TO:

For Wire Instructions:

Bank: WELLS FARGO BANK
ABA #: 121000248

For ACH Instructions:

Bank: WELLS FARGO BANK
ABA#: 063107513

CREDIT TO: GREENBERG TRAUIG DEPOSITORY ACCOUNT
ACCOUNT #: 2000014648663

PLEASE

REFERENCE: CLIENT NAME: WINKLER, GEOFF
FILE NUMBER: 209375.010100
INVOICE NUMBER: 1000315185*
BILLING
PROFESSIONAL: Kara B. Hendricks

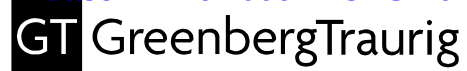
IF YOU WISH TO PAY BY CHECK PLEASE REMIT TO THE ADDRESS BELOW:

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

Wire fees may be assessed by your bank.

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

KBH:LC
Tax ID: 13-3613083

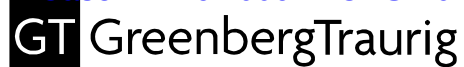


Invoice No.: 1000315185
File No. : 209375.010100

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

KBH:LC

Tax ID: 13-3613083



Invoice No. : 1000315185
 File No. : 209375.010100

Account Statement

<u>Date</u>	<u>Invoice #</u>	<u>Fees Due</u>	<u>Expenses Due</u>	<u>Other Due</u>	<u>Total Due</u>
07/19/22	1000035547	16,627.52	0.00	0.00	16,627.52
10/03/22	1000096060	12,029.69	0.00	0.00	12,029.69
11/09/22	1000142381	16,674.86	0.00	0.00	16,674.86
11/09/22	1000142507	8,666.16	0.00	0.00	8,666.16
02/14/23	1000224348	14,644.91	0.00	0.00	14,644.91
02/14/23	1000224438	12,682.94	0.00	0.00	12,682.94
02/14/23	1000224498	11,834.06	0.00	0.00	11,834.06
05/11/23	1000312069	60,596.93	1,211.95	0.00	61,808.88
	Totals:	\$ 153,757.07	\$ 1,211.95	\$ 0.00	\$ 154,969.02

KBH:LC

Tax ID: 13-3613083

Description of Professional Services Rendered:

TASK CODE: GW001 ASSET ANALYSIS AND RECOVERY

<u>DATE</u>	<u>TIMEKEEPER</u>	<u>DESCRIPTION</u>	<u>HOURS</u>	<u>AMOUNT</u>
03/01/23	Kyle Ewing	Conference with K. Hendricks re: status of letters to defendants re: securing assets subject to freeze, status of EcoBattery/EcoCapital investigation and analysis, and comments re: draft letter to A. Grigsby re: failure to cure contempt	0.30	102.00
03/01/23	Kara B. Hendricks	Review order denying Dean motion for reconsideration and awarding fees and request C. Spaulding's assistance with preparation of memo of costs;	0.20	96.05
03/01/23	Kara B. Hendricks	Follow-up with K. Ewing regarding Grigsby analysis and next steps in conjunction with turnover demand;	0.20	96.05
03/01/23	Christian Spaulding	Evaluate minute order (ECF 473) regarding Kamille Dean appeals of magistrate orders and confer with team regarding fee memorandum related to the same.	0.30	95.63
03/02/23	Kyle Ewing	Participate in weekly team call with AFS, Allen Matkins (J. delCastillo and M. Pham), and GT (K. Hendricks) re: ongoing work, activities, and tasks including progress on forensic accounting, securing assets from amended defendants, continuing efforts to dispose of vehicles and real property, investigation of litigation opportunities, and other items	1.10	374.00
03/02/23	Kyle Ewing	Review and revise draft correspondence to A. Grigsby drafted by C. Spaulding; email communication with Spaulding and K. Hendricks re: the same	2.10	714.00
03/02/23	Kara B. Hendricks	Further review of proposed safeguard contract relating to data imaging services and follow-up with J. Hall regarding comments/concerns regarding same;	1.00	480.25
03/02/23	Kara B. Hendricks	Attention to email and listen to voice mail message from J. Jongeward and follow-up with M. Shalmy and Z. Jordan on next steps given lack of filed corporate records (.3); Telephone call with M. Shalmy to provide additional information for review (.3); Update G. Winkler (.1);	0.70	336.18
03/02/23	Kara B. Hendricks	Attention to emails from K. Dean regarding credit card payments and follow-up with G. Winkler regarding same;	0.10	48.03
03/02/23	Kara B. Hendricks	Discuss Grisby letter and anticipated motion to compel with K. Ewing;	0.20	96.05
03/02/23	Kara B. Hendricks	Participate in call for update regarding	1.00	480.25

		forensic accounting, tax issues, asset recovery matters, communication with defendants and next steps (participants include J. Hall, A. Deering, K. Ewing, M. Pham, J. delCastillo);		
03/02/23	Michael S. Shalmy	Review and research regarding assignments and related issues regarding general partnership;	0.70	354.03
03/02/23	Christian Spaulding	Emails with team regarding draft letter to A. Grigsby regarding deficient productions.	0.20	63.75
03/03/23	Kara B. Hendricks	Review emails and work with E. Escobar-Gaddi to finalize stipulation for sale of Hammer property;	0.30	144.08
03/03/23	Kara B. Hendricks	Update Stipulation for sale of 8 Twisted Rock and work with E. Escobar-Gaddi on exhibits and finalizing same;	0.30	144.08
03/03/23	Kara B. Hendricks	Correspond with G. Winkler regarding meeting with Eco Capital and email F. Feel and R. Dahlson regarding scheduled meeting;	0.30	144.08
03/03/23	Kara B. Hendricks	Correspond with G. Winkler regarding questions raised regarding JL2 Investment Group and follow-up via email and phone call with J. Jongeward;	0.80	384.20
03/03/23	Kara B. Hendricks	Correspond via emails with G. Winkler regarding correspond with the DOJ regarding Beasley turnover and K. Dean payment issues;	0.20	96.05
03/03/23	Kara B. Hendricks	Review correspondence from K. Issac deVyver regarding anticipated objections to special counsel and forward to G. Winkler;	0.10	48.03
03/03/23	Kara B. Hendricks	Review emails and documents and correspond with A. Preibe and A. Deering regarding DETR notices sent to ACAC;	0.10	48.03
03/06/23	Kyle Ewing	Telephonic conference with K. Hendricks and M. Shalmy (GT) re: corporate entity issues with investments of J. Jongeward/JL2 investments in Ecobattery and related issues re: other investors	0.30	102.00
03/06/23	Kyle Ewing	Email communication with G. Winkler and K. Hendricks re: K. Dean payment of outstanding fee awards	0.10	34.00
03/06/23	Kara B. Hendricks	Review various emails from G. Winkler and SEC counsel regarding EcoBattery issues;	0.10	48.03
03/06/23	Kara B. Hendricks	Review documents and information from J. Jongeward, follow-up with corporate team for further analysis and preparation of transfer documents (.7); Provide summary of same to G. Winkler (.2);	0.90	432.23
03/06/23	Kara B. Hendricks	Review correspondence from A. Grigsby and follow-up regarding discussion with P. Beasley;	0.20	96.05
03/06/23	Kara B. Hendricks	Review emails from L. Maningo regarding Seybert matters and follow-up with G. Winkler regarding same;	0.10	48.03
03/06/23	Kara B. Hendricks	Discussion with G. Winkler regarding Eco	0.10	48.03

03/06/23	Kara B. Hendricks	Capital meeting; Correspond via email from A. Deering regarding Jager trust and meeting requested with counsel;	0.10	48.03
03/06/23	Michael S. Shalmy	Continue review of issues related to assignment, including issues related to general partnership items and not filing with Secretary of State (.8); review of documents related to loans and investments in JL2 Investment Group (.5);	1.30	657.46
03/07/23	Kara B. Hendricks	Discuss ability to accept credit card payments with accounting team and follow-up with K. Dean (.1); Follow-up with C. Spaulding regarding new memo of fees (.1);	0.20	96.05
03/07/23	Kara B. Hendricks	Review updated Safeguard agreement and correspond with G. Winkler regarding same;	0.10	48.03
03/07/23	Kara B. Hendricks	Telephone call with M. Cook to discuss Murphy asset list and dismissal of state court action;	0.20	96.05
03/07/23	Kara B. Hendricks	Provide M. Shalmy additional information regarding JL2 Investment Group and discuss plan to transition managerial control to G. Winkler;	0.20	96.05
03/07/23	Kara B. Hendricks	Correspond with C. Fronk regarding protective order and D. Seybert request;	0.30	144.08
03/07/23	Kara B. Hendricks	Call with G. Winkler and J. Hall regarding Seybert and JL2 issues and work through same;	0.60	288.15
03/07/23	Kara B. Hendricks	Review orders authorizing the sale of Hammer and Twisted Rock properties and follow-up with A. Deering regarding same;	0.10	48.03
03/07/23	Kara B. Hendricks	Review objection to appeal and forward to conflict counsel to handle going forward;	0.20	96.05
03/08/23	Kyle Ewing	Plan and prepare for drafting final K. Dean memorandum of fees and costs; email communication with C. Ney and C. Spaulding re: the same	0.20	68.00
03/08/23	Kara B. Hendricks	Telephone call from L. Maningo regarding turnover of additional assets and next steps (.3); Prepare detailed email to C. Fronk and G. Winkler regarding same (.2);	0.50	240.13
03/08/23	Kara B. Hendricks	Review Eco Battery operating to evaluate issues raised by L. Palzza and follow-up with real estate team regarding language in assignment;	0.30	144.08
03/08/23	Kara B. Hendricks	Correspond with J. Hall regarding Safeguard proposal;	0.20	96.05
03/08/23	Kara B. Hendricks	Call with L. Pallazo and A. Deering regarding Jager/Eco Battery issues;	0.30	144.08
03/08/23	Kara B. Hendricks	Call with C. Fronk and M. Welsh regarding defendant demands and securing assets;	0.70	336.18
03/08/23	Kara B. Hendricks	Confer with A. Deering regarding demand letters to defendants (Judd, Humphries, Madsen) and asset lists to accompany same;	0.30	144.08

03/08/23	Kara B. Hendricks	Review asset recovery list provided by A. Deering and request C. Ney's assistance in finalizing additional turnover demand letters for Judd, Humphries and Madsen;	0.30	144.08
03/08/23	Kara B. Hendricks	Review information to include with memo of costs relating to Dean appeals/objections and follow-up with C. Ney regarding same;	0.30	144.08
03/08/23	Cynthia L. Ney	Analysis of billings and redact time entries not applicable to motion for fees regarding Dean's reconsideration, complete spreadsheet of hours and fees for entry into Motion (3.4); communications with K.Hendricks and C.Spaulding regarding same (.3).	3.70	647.50
03/08/23	Christian Spaulding	Communications with team regarding invoices and charges related to Objections filed by Kamille Dean pursuant to Court's order.	0.50	159.38
03/08/23	Christian Spaulding	Evaluate order affirming magistrate judge's orders. Review billing entries related to Response to K. Dean Objection and begin draft of Memorandum of Fees related to the same.	2.50	796.88
03/09/23	Kyle Ewing	Participate in weekly call with AFS, GT Team (K. Hendricks), and Allen Matkins team, including discussion of issues with Jager investment in EcoBattery; ongoing attempt to get understanding of Grigsby/P. Beasley issues, ongoing disposition of real estate; securing assets from relief defendants, and other items	0.80	272.00
03/09/23	Kyle Ewing	Participate in meet and confer with A. Grigsby and K. Hendricks; plan and prepare for the same and confer re: strategy going forward with K. Hendricks and C. Spaulding	0.90	306.00
03/09/23	Kyle Ewing	Email communication re: comments and edits to final K. Dean memorandum of fees/costs with K. Hendricks and C. Spaulding; review order granting fees in connection with the same	0.30	102.00
03/09/23	Kara B. Hendricks	Review information for call with A. Grigsby;	0.10	48.03
03/09/23	Kara B. Hendricks	Review emails from G. Winkler regarding EcoBattery; Email L. Palazzo to get additional payment information relating to Jager;	0.10	48.03
03/09/23	Kara B. Hendricks	Correspond with A. Priebe regarding letters to defendants regarding documents and review draft of same;	0.10	48.03
03/09/23	Kara B. Hendricks	Correspond with C. Spaulding regarding scope of memo of costs to address Dean	0.10	48.03
03/09/23	Kara B. Hendricks	Finalize turnover letter to Judd and Humphries;	0.80	384.20
03/09/23	Kara B. Hendricks	Call with A. Grigsby regarding Paula Beasley assets and turnover(.7); Prepare detailed email to A. Grigsby confirming	1.20	576.30

03/09/23	Kara B. Hendricks	discussion and outlining matters to be addressed in his response (.5); Correspond with G. Winkler regarding communication with FBI and turnover of assets seized from Beasley;	0.30	144.08
03/09/23	Kara B. Hendricks	Review and revise proposal from TCW for services and follow-up with J. Hall regarding same;	0.90	432.23
03/09/23	Kara B. Hendricks	Call with Receivership team (G. Winkler, J. Hall, A. Deering, D. Zaro, j. delCastillo and K. Ewing) to discuss status of forensic account, discussions with defendants and counsel, asset value and turnover and other pending matters;	0.70	336.18
03/09/23	Kara B. Hendricks	Participate in call with G. Winkler, J. Hall, C. Fronk and others from SEC to discuss Eco Battery recovery issues;	0.70	336.18
03/09/23	Kara B. Hendricks	Review and evaluate information provided by A. Deering regarding recovered assets compared with identified but unrecovered assets of named defendants;	0.40	192.10
03/09/23	Cynthia L. Ney	Preparation of spreadsheet regarding assets received from various defendants and forwarding of same to K.Hendricks.	0.90	157.50
03/09/23	Cynthia L. Ney	Finalize letters regarding securing receivership property for J.Judd and counsel for C.Humphries and service of same (.7); communications with K.Hendricks regarding same (.1).	0.80	140.00
03/09/23	Michael S. Shalmy	Continue review of documents related to loans by and investments in JL2 Investment Group;	1.70	859.78
03/09/23	Christian Spaulding	Begin draft of declaration of Kara Hendricks ISO Memorandum of Fees related to Ms. Dean's Objections	0.70	223.13
03/09/23	Christian Spaulding	Revise Memorandum of fees regarding Kamille Dean Objections per comments by K. Hendricks and confer with team regarding the same.	0.40	127.50
03/09/23	Christian Spaulding	Continue draft of Memorandum of Fees following Court's order in ECF No. 473 for those fees incurred in responding to K. Dean's objections.	4.10	1,306.88
03/10/23	Kyle Ewing	Finalize draft memorandum of fees and costs in preparation for filing, including final review/edits to the brief and communication with GT team re: filing the same	0.70	238.00
03/10/23	Kyle Ewing	Review and finalize draft declaration of K. Hendricks in support of memo of fees and costs (.3); follow up with C. Spaulding and C. Ney re: the same (.1)	0.40	136.00
03/10/23	Cynthia L. Ney	Attention to communications from counsel for defendants Jenne and Richard Madsen and update chart regarding securing receivership property.	0.30	52.50
03/10/23	Cynthia L. Ney	Redaction of further invoices and editing of	2.40	420.00

		application for fees regarding K.Dean (2.2); communications with C.Spaulding regarding same (.2).		
03/10/23	Christian Spaulding	Confer with K. Ewing regarding finalizing memorandum of fees and declarations in support.	0.20	63.75
03/10/23	Christian Spaulding	Continue and finalize draft of Declaration for Kara Hendricks (.4); update draft of memorandum of fees accordingly (.9).	1.30	414.38
03/10/23	Christian Spaulding	Gather invoice for recent work, calculate relevant fees and revise draft of Memorandum of Fees and Declaration of Kara Hendricks with amounts.	1.90	605.63
03/10/23	Christian Spaulding	Assist in finalizing memorandum of fees and declaration for filing (.5); adjust calculated amounts for pre-bill to reflect discounted rates and revise drafts accordingly (.4); confer with team to facilitate filing (.3).	1.20	382.50
03/14/23	Michael S. Shalmy	Continue review of assignment items and related documents;	1.70	859.78
03/15/23	Kyle Ewing	Begin researching law re: 28 U.S.C. S. 2001 in connection with addressing comment of G. Winkler re: receiver's motion for approval of interim distributions and other procedures in preparation for call with Winkler re: the same	0.80	272.00
03/15/23	Kara B. Hendricks	Review correspondence from D. O'Toole (R. Madsen) and J. Giardino (C. Madsen) relating to turnover demand and review underlying documents (.5); Follow-up with G. Winkler regarding next steps (.1);	0.60	288.15
03/15/23	Kara B. Hendricks	Attention to emails from L. Maningo regarding Seybert and follow-up regarding security and proposed release and update G. Winkler regarding same;	0.30	144.08
03/15/23	Kara B. Hendricks	Review responses from counsel for defendants regarding scheduling time to discuss asset recovery including T. Elson (Jenne), M. Cook (M. Murphy) and follow-up with G. Winkler regarding same;	0.40	191.79
03/15/23	Kara B. Hendricks	Review email from C. Fronk regarding protective order and numerous responses from counsel regarding same and follow-up with G. Winkler;	0.30	144.08
03/15/23	Cynthia L. Ney	Analysis of attorney response communications regarding securing receivership property and update chart with responses (.9); communications with K.Hendricks regarding same (.1)	1.00	175.00
03/15/23	Cynthia L. Ney	Preparation of letter to J.Jongeward regarding receivership assets (.3); communications with A.Deering requesting asset listing for additional defendants (.1); communications with K.Hendricks regarding same (.1).	0.50	87.50
03/15/23	Cynthia L. Ney	Review email communications from	0.30	52.50

		A.Deering regarding IOLTA and update file regarding same.		
03/16/23	Kara B. Hendricks	Attention to emails from A. Deering regarding R. Madsen issues and L. Jeffrey funds;	0.10	48.03
03/16/23	Kara B. Hendricks	Attention to email from L. Maningo regarding Seybert turnover and follow-up with L. Maningo regarding Rosegreen letter;	0.20	96.05
03/16/23	Kara B. Hendricks	Participate in call with Receivership team including G. Winkler, J. Hall, A. Deering, J. del Castillo, D. Zaro and M. Pham to discuss status of accounting, defendant demands, motion practice and asset recovery efforts;	0.60	288.15
03/16/23	Kara B. Hendricks	Confer with M. Shalmy regarding Jager assignment regarding EcoBattery interest and trouble shoot issues relating to JL2 Investment Group assignment and goals relating to same;	0.70	336.18
03/16/23	Cynthia L. Ney	Communications with K.Ewing and process server regarding service of subpoenas.	0.20	35.00
03/17/23	Kara B. Hendricks	Correspond with counsel for Defendants D. O'Toole (R. Madsen), M. Cook (M. Murphy), J. Giradino (C. Madsen) regarding further turnover conversations;	0.20	96.05
03/17/23	Michael S. Shalmy	Continue review of documents and partnership agreement for JL2 Investment Group; drafting of assignment documents and consent;	1.80	910.35
03/19/23	Michael S. Shalmy	Continue drafting of written consent of partners related to assignments of loans; revise assignments of loan documents and membership interest; send drafts to Ms. Hendricks;	2.50	1,264.38
03/20/23	Kara B. Hendricks	Correspond with G. Winkler and N. Umpruss regarding case meeting;	0.10	48.03
03/20/23	Kara B. Hendricks	Review Jager assignments relating to Eco Battery and discuss same with M. Shalmy (.4); Prepare detailed email to G. Winkler outlining issues and next steps (.4);	0.80	384.20
03/20/23	Kara B. Hendricks	Review email and documents from M. Shalmy relating to JL2 Investment Group assignments (.3); Discuss scope and related issues with M. Shalmy (.4); Review updated documents and provide to G. Winkler with comments (.2);	0.90	432.23
03/20/23	Kara B. Hendricks	Respond to email from L. Jeffery regarding Nolan lawsuit and provide copies of prior correspondence with filing attorney (.2); update G. Winkler (.1).	0.30	144.08
03/20/23	Kara B. Hendricks	Attention to email and attachments from L. Palazzo regarding Jager payments to Ecobattery and follow-up with G. Winkler regarding same;	0.30	144.08
03/20/23	Kara B. Hendricks	Attention to emails regarding meeting with	0.10	48.03

03/20/23	Michael S. Shalmy	counsel for C. Madsen; Conference with Ms. Hendricks regarding assignment documents (.2); revise same and send to Ms. Hendricks (.8).	1.00	505.75
03/21/23	Kara B. Hendricks	Revise correspondence to J. Jonegward regarding turnover of assets and request C. Ney use same as a template for other defendant letters;	0.20	96.05
03/21/23	Kara B. Hendricks	Telephone call with D. O'Toole regarding R. Madsen asset turnover (.5); Prepare confirming email (.2); Follow-up with G. Winkler and A. Deering regarding turnover and pick-up (.4);	1.10	528.28
03/21/23	Kara B. Hendricks	Correspond with A. Deering regarding Madsen Duck Creek property and turnover issues;	0.10	48.03
03/21/23	Kara B. Hendricks	Correspond with C. Fronk regarding upcoming hearing;	0.20	96.05
03/21/23	Kara B. Hendricks	Correspond with L. Palazzo regarding Jager assignment documents and provide updated versions of same;	0.20	96.05
03/21/23	Kara B. Hendricks	Attention to email from L. Maningo regarding Rosegreen assets;	0.20	96.05
03/21/23	Kara B. Hendricks	Call with M. Cook and G. Winkler regarding asset turnover and send follow-up email with wire instructions and additional information (.7); Prepare email to A. Deering outlining items agreed to be turned over and discussing next steps (.2);	0.90	432.23
03/21/23	Cynthia L. Ney	Analysis and electronic organization of defendant materials.	0.30	52.50
03/22/23	Kara B. Hendricks	Correspond with J. del Castillo and J. Rickard regarding upcoming hearing coverage; Outline pending matters for discussion at hearing;	0.40	192.10
03/22/23	Kara B. Hendricks	Respond to emails from C. Madsen counsel and correspond with G. Winkler regarding same;	0.20	96.05
03/22/23	Kara B. Hendricks	Review correspondence to R. Tanner regarding turnover of assets;	0.10	48.03
03/22/23	Kara B. Hendricks	Discussion with C. Fronk, M. Welsh, G. Winkler regarding upcoming hearing and case issues;	0.50	240.13
03/22/23	Kara B. Hendricks	Attend status hearing and debrief with G. Winkler regarding pending matters and next steps;	2.30	1,104.58
03/22/23	Cynthia L. Ney	Preparation of additional letters to defendants regarding securing and turnover of receivership property and forwarding of letters (.9); finalize and forwarding to defendants (.4); communications with K.Hendricks regarding letters (.1).	1.40	245.00
03/23/23	Kara B. Hendricks	Review Hurricane listing agreement and prepare addendum to accompany same providing additional information regarding receivership;	0.60	288.15
03/23/23	Kara B. Hendricks	Participate in call with team to discuss	0.60	288.15

		forensic accounting, contact with defendants and asset recovery efforts, investor communications, and pending matters (G. Winkler, A. Deering, J. del Castillo, M. Pham and other participating)		
03/23/23	Kara B. Hendricks	Provide draft assignments to D. Zaro for use as template for Flavocure;	0.10	48.03
03/23/23	Kara B. Hendricks	Respond to email from A. Grigsby and follow-up with C. Spaulding regarding motion;	0.10	48.03
03/23/23	Kara B. Hendricks	Attention to email from K. Works regarding Humphries turnover and review asset recovery list and related stipulations (.5); Follow-up with G. Winkler and A. Deering regarding same (.1);	0.60	288.15
03/23/23	Christian Spaulding	Confer with K. Hendricks regarding status of documents to be turned over by A. Grigsby and motion related to the same.	0.20	63.70
03/24/23	Kara B. Hendricks	Attempt conference with J. Giardino and send 2 follow-up emails due to delay; Confer with G. Winkler regarding next steps;	0.40	192.10
03/24/23	Christian Spaulding	Communications with team regarding receipt of any documents from A. Grigsby.	0.20	63.75
03/26/23	Christian Spaulding	Begin draft of Motion For Order to Show Cause Why A. Grigsby and P. Beasley Should not be held in contempt	2.00	637.50
03/27/23	Kyle Ewing	Communication with K. Hendricks and C. Spaulding re: additional documents provided by A. Grigsby on 3/24 and strategy for reviewing and renewing motion for an order to show cause and for turnover of assets	0.20	68.00
03/27/23	Kara B. Hendricks	Attention to email from G. Winkler regarding JL2 Investor consent and follow-up regarding Ecobattery documents requested from Jager;	0.10	48.03
03/27/23	Kara B. Hendricks	Call with L. Maningo and G. Winkler to discuss Rosegreen turnover and D. Seybert issues (.4); Debrief with G. Winkler regarding other turnover issues (.1);	0.50	240.13
03/27/23	Kara B. Hendricks	Initial review of documents from A. Grigsby and prepare email to G. Winkler regarding same (.4); Follow-up with C. Spaulding regarding review of information from A. Grigsby and related motion (.2);	0.60	288.15
03/27/23	Christian Spaulding	Evaluate documents produced by A. Grigsby including consideration of amounts stated in various declarations as compared to documents produced.	4.10	1,306.88
03/28/23	Kyle Ewing	Plan and prepare with K. Hendricks for tomorrow's meetings with lawyers for EcoSource/Eco Capital re: their efforts to extinguish receivership estate's interests in EcoSource; discuss strategic options for compromise of receiver's claims re: the same	0.20	68.00

03/28/23	Kyle Ewing	Follow up communication with K. Hendricks and C. Spaulding re: additional documents provided by A. Grigsby on 3/24 and strategy for reviewing and renewing motion for an order to show cause and for turnover of assets (.5); follow up with M. Chavez (AFS) re: the same (.1).	0.60	204.00
03/28/23	Kara B. Hendricks	Confer with C. Spaulding regarding Grigsby document review and motion and review emails regarding same;	0.20	96.05
03/28/23	Kara B. Hendricks	Attention to emails from K. Dean proposing payment schedule review prior filings for amounts due and follow-up with G. Winkler and correspond with C. Spaulding regarding same (.5); Review and revise draft stipulation and send to K. Dean (.3);	0.80	384.20
03/28/23	Kara B. Hendricks	Review documents for upcoming meeting with Eco Capital including loan documents, assignments, prior communication etc. (3.1) ; Follow-up with L. Palazzo regarding signed Eco Battery documents from S. Jager (.2); Email L. Abbott regarding meeting (.1);	3.40	1,632.85
03/28/23	Kara B. Hendricks	Review information regarding Carver investments and potential law suit;	0.50	240.13
03/28/23	Christian Spaulding	Draft stipulation and order regarding Kamille Dean payment of fees owed.	1.70	541.88
03/28/23	Christian Spaulding	Emails with team regarding Aaron Grigsby's second production of documents.	0.20	63.75
03/29/23	Kyle Ewing	Email communication with K. Dean and AFS re: w-9 in connection with Dean's payment of the receiver's fee award	0.10	34.00
03/29/23	Kyle Ewing	Email communication with K. Hendricks and E. Escobar re: apparent indictment of M. Beasley; review media reports of the same	0.20	68.00
03/29/23	Kyle Ewing	Draft NDA for execution by outside forensic accountant prior to his beginning work; review and revise the same	1.60	544.00
03/29/23	Kyle Ewing	Email communication with K. Hendricks, J. Hall, and M. Chavez re: NDA for O. Reyvch governing receivership documents/information; review protective orders entered in receivership proceeding in connection with the same	0.40	136.00
03/29/23	Kara B. Hendricks	Review information regarding Beasley indictment and correspond with K. Ewing and G. Winkler regarding same;	0.30	144.08
03/29/23	Kara B. Hendricks	Attend meeting with representatives of Eco Capital and debrief with G. Winkler;	2.60	1,248.65
03/29/23	Kara B. Hendricks	Review emails and confer with G. Winkler regarding concerns relating to Defendant funds not turned over by banks and next steps;	0.20	96.05
03/29/23	Kara B. Hendricks	Discuss negotiations and Eco Battery documents with G. Winkler, review	1.40	672.35

		assignment documents and loan materials ad discuss meeting strategy;		
03/29/23	Kara B. Hendricks	Request E. Esobar-Gaddi's assistance with filing of Dean stipulation; respond to emails from K. Dean regarding same;	0.30	144.08
03/29/23	Kara B. Hendricks	Correspond with J. del Castillo regarding correspondence from A. Grigsby;	0.10	48.03
03/29/23	Christian Spaulding	Analysis of prior proceedings and begin draft of Motion for Order to Show Cause why A. Grigsby and P. Beasley should not be held in contempt.	3.30	1,051.88
03/30/23	Kyle Ewing	Follow-up with J. Hall and A. Deering re: W-9 for payment of Dean's fee awards	0.10	34.00
03/30/23	Kyle Ewing	Review and analyze subpoena waiver request from counsel for R. Madsen re: discovery from the receiver; confer with K. Hendricks re: receiver's options for regarding the same, including acceptance of subpoena and objections/motion for a protective order (.1); begin researching law in support of objections and motion and follow up with K. Hendricks re: the same (.3).	0.40	136.00
03/30/23	Kyle Ewing	Review and analyze Beasley indictment in criminal case initiated against him by USA; review documents related to his initial appearance on Friday and communication with G. Winkler and K. Hendricks re: the impact on this case.	0.30	102.00
03/30/23	Kyle Ewing	Participate in weekly receiver team call with AFS (G. Winkler and others) and AM (J. DelCastillo and D. Zaro) re: ongoing asset recovery efforts, including discussion of results of meeting with EcoCapital counsel; recent developments in the class action litigation against third parties; recent criminal indictment of M. Beasley and effect of case on receivership proceeding, latest production of Grigsby documents; and other items (0.8); plan and prepare for the same with K. Hendricks and follow up (0.7)	1.50	510.00
03/30/23	Kara B. Hendricks	Attention to emails regarding K. Dean wire transfer and confirm receipt of same;	0.10	48.03
03/30/23	Kara B. Hendricks	Follow-up with K. Ewing regarding team meeting and issues to discuss.	0.20	96.05
03/30/23	Kara B. Hendricks	Review information from L. Maningo regarding Rocking Horse; Correspond with A. Deering regarding Rocking Horse property status;	0.20	96.05
03/30/23	Kara B. Hendricks	Pick up Beasley assets from US Marshal's office; Update G. Winkler and discuss other turnover issues and concerns;	0.70	336.18
03/30/23	Kara B. Hendricks	Attention to emails regarding C. Madsen and meeting to discuss turnover;	0.10	48.03
03/30/23	Kara B. Hendricks	Attention to email from D. Toole regarding R. Madsen turnover and follow-up with A.	0.40	192.10

		Deering regarding same; Follow-up with G. Winkler regarding subpoena/discovery request; Correspond with A. Deering and A. Toole regarding Madsen property in Utah;		
03/30/23	Kara B. Hendricks	Respond to email from L. Maningo regarding Rosgreen turnover and follow-up with A. Deering regarding same;	0.10	48.03
03/30/23	Kara B. Hendricks	Review indictment and Beasley criminal filings (.2) Review and respond to email from I. Ducosin regarding pick-up with Beasley assets seized by FBI (.2); Follow-up with G. Winkler regarding pick up plan (.2);	0.60	288.15
03/30/23	Kara B. Hendricks	Attention to correspondence from D. Clukey regarding meeting to discuss turnover by Johnson and Rohner and follow-up with G. Winkler regarding same;	0.10	48.03
03/30/23	Cynthia L. Ney	Analysis and electronic organization of defendant materials.	0.30	52.50
03/30/23	Cynthia L. Ney	Attention to criminal indictment and information regarding M.Beasley.	0.20	35.00
03/31/23	Kyle Ewing	Email communication with A. Deering (AFS) and K. Dean re: Dean's request for a w-9 for the receiver in connection with her payments of attorneys' fees and costs	0.20	68.00
03/31/23	Kyle Ewing	Confer with K. Hendricks re: result of conference with counsel for C. Madsen re: Madsen's failure to comply with the receivership order and document requests	0.20	68.00
03/31/23	Kyle Ewing	Research law re: limited participation of receiver in discovery under Nevada/Ninth Circuit precedent in light of counsel for R. Madsen indicating Madsen intends to improperly seek discovery from the Receiver; review the appointment order in connection with the same; confer with K. Hendricks re: the same	0.30	102.00
03/31/23	Kyle Ewing	Research appealability of motion to intervene in connection with assessing options for receiver's response to intervenors' appeal to the Ninth Circuit; email communication with G. Winkler and K. Hendricks re: the same	0.40	136.00
03/31/23	Kyle Ewing	Email communication with A. Deering and K. Hendricks re: subpoenaing cell phone carriers for text messages and phone records of defendant promoters; plan and prepare for drafting/issuing subpoenas	0.30	102.00
03/31/23	Kara B. Hendricks	Attention to email from A. Deering regarding Beasley watches and provide paperwork obtained from US Marshal; Follow-up with B. Tranquillo regarding picking up same;	0.20	96.05
03/31/23	Kara B. Hendricks	Call with G. Winkler regarding Beasley assets and impact of upcoming hearing;	0.20	96.05
03/31/23	Kara B. Hendricks	Telephone call with G. Winkler and J.	1.10	528.28

		Giradino regarding C. Madsen assets (.5); Review prior emails and send follow-up confirming discussion to J. Giradino (.5); Email C. Fonk regarding same (.1);		
03/31/23	Kara B. Hendricks	Respond to email from T. Elson regarding Jenne assets;	0.10	48.03
03/31/23	Kara B. Hendricks	Correspond with K. Ewing regarding strategy for obtaining telephone records;	0.10	48.03
03/31/23	Kara B. Hendricks	Attention to emails from A. Deering regarding various issues including R. Madsen house, attorney retainer balances, investment turnover, Rosegreen turnover,	0.20	96.05
03/31/23	Cynthia L. Ney	Analysis and organization of documentation related to defendants and asset recovery.	0.40	70.00
03/31/23	Christian Spaulding	Evaluate court order granting stipulation for fees Re: Kamille Dean.	0.20	63.75
03/31/23	Christian Spaulding	Continue evaluation of documents and information provided by A. Grigsby and draft of Motion for Order to Show Cause.	4.50	1,434.38
Total Hours:			115.40	
Total Amount:				\$ 44,916.73

TIMEKEEPER SUMMARY FOR TASK CODE GW001,

ASSET ANALYSIS AND RECOVERY

Summary of Fees (Base Rates)

<u>Timekeeper Name</u>	<u>Hours Billed</u>	<u>Base Rate</u>	<u>Total \$ Amount</u>
Kara B. Hendricks	47.30	565.00	26,724.50
Michael S. Shalmy	10.70	595.00	6,366.50
Kyle Ewing	15.00	400.00	6,000.00
Christian Spaulding	29.70	375.00	11,137.50
Cynthia L. Ney	12.70	295.00	3,746.50
Totals:	115.40		\$ 53,975.00

Summary of Fees (Discounted Rates)

<u>Timekeeper Name</u>	<u>Hours Billed</u>	<u>Average Discounted Rate</u>	<u>Total \$ Amount</u>
Kara B. Hendricks	47.30	480.25	22,715.82
Michael S. Shalmy	10.70	505.75	5,411.53
Kyle Ewing	15.00	340.00	5,100.00
Christian Spaulding	29.70	318.75	9,466.88
Cynthia L. Ney	12.70	175.00	2,222.50
Totals:	115.40		\$ 44,916.73

TASK CODE: GW005 CLAIMS ADMINISTRATION AND OBJECTIONS

<u>DATE</u>	<u>TIMEKEEPER</u>	<u>DESCRIPTION</u>	<u>HOURS</u>	<u>AMOUNT</u>
03/03/23	Kara B. Hendricks	Follow-up with J. Hall regarding new information reviewed regarding Safeguard assistance with document issues;	0.10	48.03
03/20/23	Kara B. Hendricks	Review and revise draft update to investors regarding March activities and provide comments to A. Priebe;	0.40	192.10
Total Hours:			0.50	
Total Amount:				\$ 240.13

TIMEKEEPER SUMMARY FOR TASK CODE GW005,

CLAIMS ADMINISTRATION AND OBJECTIONS

Summary of Fees (Base Rates)

<u>Timekeeper Name</u>	<u>Hours Billed</u>	<u>Base Rate</u>	<u>Total \$ Amount</u>
Kara B. Hendricks	0.50	565.00	282.50
Totals:	0.50		\$ 282.50

Summary of Fees (Discounted Rates)

<u>Timekeeper Name</u>	<u>Hours Billed</u>	<u>Average Discounted Rate</u>	<u>Total \$ Amount</u>
Kara B. Hendricks	0.50	480.26	240.13
Totals:	0.50		\$ 240.13

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

<u>Timekeeper</u>	<u>Hours</u>	<u>Rate</u>	<u>Amount</u>
Kara B. Hendricks	47.80	565.00	27,007.00
Michael S. Shalmy	10.70	595.00	6,366.50
Kyle Ewing	15.00	400.00	6,000.00
Christian Spaulding	29.70	375.00	11,137.50
Cynthia L. Ney	12.70	295.00	3,746.50
	<hr/>	<hr/>	<hr/>
Totals:	115.90		\$ 54,257.50

Summary of Fees (Discounted Rates)

<u>Timekeeper</u>	<u>Hours</u>	<u>Rate</u>	<u>Amount</u>
Kara B. Hendricks	47.80	480.25	22,955.95
Michael S. Shalmy	10.70	505.75	5,411.53
Kyle Ewing	15.00	340.00	5,100.00
Christian Spaulding	29.70	318.75	9,466.88
Cynthia L. Ney	12.70	175.00	2,222.50
	<hr/>	<hr/>	<hr/>
Totals:	115.90		\$ 45,156.86

Invoice No.: 1000315185
Re: SEC v. Beasley (Geoff Winkler, Receiver)
Matter No.: 209375.010100

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Description of Expenses Billed:

<u>DATE</u>	<u>DESCRIPTION</u>	<u>AMOUNT</u>
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No expenses charged to this file



Invoice No. : 1000340006
 File No. : 209375.010100
 Bill Date : June 9, 2023

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

Attn: Geoff Winkler

INVOICE

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

Legal Services through May 31, 2023:

	Total Fees:	\$	37,923.86
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Expenses:

Off-site Printing and Copying Charges	8.69	
Subpoenas	345.00	
UPS Charges	22.64	

	Total Expenses:	\$	376.33
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	Current Invoice:	\$	38,300.19
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	Previous Balance (see attached statement):	\$	107,120.75
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	Total Amount Due:	\$	145,420.94
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KBH:TKK

Tax ID: 13-3613083



Invoice No.: 1000340006
File No. : 209375.010100

REMITTANCE ADVICE

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

CLIENT NAME: WINKLER, GEOFF
FILE NUMBER: 209375.010100
INVOICE NUMBER: 1000340006*
BILLING PROFESSIONAL: Kara B. Hendricks

Current Invoice:	\$	38,300.19
Previous Balance:	\$	107,120.75
Total Amount Due:	\$	145,420.94

FOR YOUR CONVENIENCE, WIRE TRANSFER FUNDS TO:

For Wire Instructions:

Bank: WELLS FARGO BANK
ABA #: 121000248

For ACH Instructions:

Bank: WELLS FARGO BANK
ABA#: 063107513

CREDIT TO: GREENBERG TRAUIG DEPOSITORY ACCOUNT
ACCOUNT #: 2000014648663

PLEASE

REFERENCE: **CLIENT NAME:** WINKLER, GEOFF
FILE NUMBER: 209375.010100
INVOICE NUMBER: 1000340006*
BILLING
PROFESSIONAL: Kara B. Hendricks

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

Greenberg Traurig
PO Box 936769
ATLANTA GA 31193-6769

Wire fees may be assessed by your bank.

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

KBH:TKK
Tax ID: 13-3613083



Invoice No. : 1000340006
File No. : 209375.010100

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

KBH:TKK

Tax ID: 13-3613083



Invoice No. : 1000340006
 File No. : 209375.010100

Account Statement

<u>Date</u>	<u>Invoice #</u>	<u>Fees Due</u>	<u>Expenses Due</u>	<u>Other Due</u>	<u>Total Due</u>
07/19/22	1000035547	16,627.52	0.00	0.00	16,627.52
10/03/22	1000096060	12,029.69	0.00	0.00	12,029.69
11/09/22	1000142381	16,674.86	0.00	0.00	16,674.86
11/09/22	1000142507	8,666.16	0.00	0.00	8,666.16
02/14/23	1000224348	14,644.91	0.00	0.00	14,644.91
02/14/23	1000224438	12,682.94	0.00	0.00	12,682.94
02/14/23	1000224498	11,834.06	0.00	0.00	11,834.06
05/15/23	1000315147	6,912.96	0.00	0.00	6,912.96
05/15/23	1000315185	7,047.65	0.00	0.00	7,047.65
	Totals:	\$ 107,120.75	\$ 0.00	\$ 0.00	\$ 107,120.75

KBH:TKK

Tax ID: 13-3613083

Description of Professional Services Rendered:

TASK CODE: GW001 ASSET ANALYSIS AND RECOVERY

<u>DATE</u>	<u>TIMEKEEPER</u>	<u>DESCRIPTION</u>	<u>HOURS</u>	<u>AMOUNT</u>
05/01/23	Kyle Ewing	Discuss strategy for receiver's reply in support of motion for order to show cause re: P. Beasley and A. Grigsby with K. Hendricks and C. Spaulding (.2), follow up with K. Hendricks re: receiver's objections to various subpoenas served on receiver as third party and objections re: cost shifting (.1)	0.30	102.00
05/01/23	Kyle Ewing	Review/finalize subpoena to Verizon and further review of AT&T, and T-Mobile subpoenas; communication with K. Hendricks and S. Morrill re: service of the same and follow-up with J. Rickard re: the same (.2); communication with Hendricks re: the receiver's status report (.1).	0.30	102.00
05/01/23	Kara B. Hendricks	Correspond with B. Tranquillo regarding R. Madsen documents;	0.10	48.03
05/01/23	Kara B. Hendricks	Follow-up with C. Spaulding regarding reply in support of Grigsby motion to compel;	0.20	96.05
05/01/23	Kara B. Hendricks	Correspond with K. Dean regarding payment of fees owed;	0.10	48.03
05/01/23	Kara B. Hendricks	Follow-up with A. Priebe regarding status report and review and revise same (1.1) ; Correspond with A. Priebe regarding investor list and prepare notice to allow for filing of same (.2);	1.30	624.33
05/01/23	Kara B. Hendricks	Meet with B. Tranquillo and discuss asset recovery efforts, vehicle status and provide signed Madsen documents;	0.20	96.05
05/01/23	Kara B. Hendricks	Correspond with S. Morrill regarding service issues relating to telephone company subpoenas;	0.10	48.03
05/01/23	Steph Morrill	Having cleared conflicts regarding service of the subpoena duces tecum on Verizon, reach out to Verizon compliance contact and inquire as to service preference (.2); Serve notice of subpoenas duces tecum (.2); Initiate service project with Nationwide and provide subpoena packets (.7);	1.10	192.50
05/02/23	Kyle Ewing	Preliminary review of documents produced in response to document request to JPM Chase re: Grigsby Iolta accounts in connection with determining whether they support receiver's position in reply in support of motion to show cause re: P.	0.90	306.00

		Beasley/Grigsby and email communication with K. Hendricks re: same.		
05/02/23	Kara B. Hendricks	Attention to email from J. Humphries with bank records; Attention to email from G. Winkler regarding funds received from K. Dean;	0.10	48.03
05/02/23	Steph Morrill	Review receipts for service of process on AT&T, T-Mobile, and Verizon carriers, and circulate received documentation to K. Ewing, and K. Hendricks;	0.30	52.50
05/02/23	Christian Spaulding	Evaluate production of documents from JPMC pertaining to A. Grigsby and confer with K. Ewing regarding the same.	1.50	478.13
05/03/23	Kyle Ewing	Review securities regulator complaint against P. La Jiness related to his role as a J&J promoter and confer with K. Hendricks and G. Winkler re: the same (.2), follow up with K. Hendricks re: D. O'Toole's position on sale of Madsen's residence (.2)	0.40	136.00
05/03/23	Kara B. Hendricks	Review emails regarding Eco Battery payments from G. Winkler and L. Abbott; Update G. Winkler regarding subpoenas for phone records;	0.20	96.05
05/03/23	Kara B. Hendricks	Follow-up with C. Spaulding regarding reply in support of Grigsby motion to compel;	0.20	96.05
05/03/23	Kara B. Hendricks	Review email from counsel for R. Madsen and forward to G. Winkler for discussion (.1); Follow-up with B. Tranquillo regarding power of attorney and Madsen MSO issues and provide draft for review (.4);	0.50	240.13
05/03/23	Kara B. Hendricks	Review information from C. Madsen counsel and correspond with G. Winkler regarding next steps;	0.30	144.08
05/03/23	Kara B. Hendricks	Attention to emails regarding P. LaJines and proceedings in Washington relating to same and review receivership order to determine implications (.5); Follow-up with G. Winkler regarding same(.1);	0.60	288.15
05/03/23	Christian Spaulding	Finalize draft of Reply in Support of Motion for Order to Show Cause Re: Grigsby.	5.40	1,721.25
05/04/23	Kyle Ewing	Review and provide edits/comments to C. Spauldings draft reply in support of receiver's motion for an order to show cause re: P. Beasley and confer with Spaulding and K. Hendrick re: the same (2.3), follow up with G. Winkler and AFS team (.2)	2.50	850.00
05/04/23	Kyle Ewing	Research law re: LLC members' rights to books and records under Utah law and review company operating agreement in connection with drafting K. Hendricks' response to H. Hatfield 4/24 letter and demand for books and records and forming	0.90	306.00

05/04/23	Kyle Ewing	litigation strategy against Eco Battery Follow up email communication with AFS team re: their review of Eco Battery/Eco Capital documents	0.10	34.00
05/04/23	Kyle Ewing	Attend weekly receiver counsel call with AFS (G. Winkler and others), AM (D. Zaro and others) and GT (K. Hendricks and myself) to discuss outstanding receivership items and issues, including recently issued subpoenas and forthcoming books and records demand, status of ancillary proceedings and sales of real property and vehicles	0.60	204.00
05/04/23	Kyle Ewing	Begin drafting K. Hendricks' response to H. Hatfield 4/24 letter and demand for books and records and full repayment of loans	0.60	204.00
05/04/23	Kara B. Hendricks	Attention to emails and information regarding amounts due from Eco Battery and record concerns;	0.20	96.05
05/04/23	Kara B. Hendricks	Review and revise reply in support of Grigsby motion to compel;	3.90	1,872.79
05/04/23	Kara B. Hendricks	Participate in team call with G. Winkler, J. Hall, D. Zaro, K. Ewing and others to discuss forensic accounting, communication with defendants, subpoenas, and asset recovery efforts;	0.40	192.10
05/04/23	Christian Spaulding	Revise draft of Reply in Support of Motion for Order to Show Cause Re: Grigsby and communicate with team regarding filing of the same.	0.70	223.11
05/05/23	Kyle Ewing	Finish drafting K. Hendricks' response demand letter and books and record request to Eco Battery (1.0); further research re: UT books and records statute in connection with the same; confer with K. Hendricks re: the letter and provide draft for her review (0.2)	1.20	408.00
05/05/23	Kara B. Hendricks	Attention to email from A. Priebe regarding documents received from defendants and follow-up with S. Morrill; Correspond with G. Winkler regarding defendants Tanner and C. Madsen; Respond to email from L. Maningo re: Seybert property; Respond to email from D. Clukey regarding subpoenas;	0.60	288.15
05/05/23	Kara B. Hendricks	Attention to email from A. Priebe with document questions and confer with S. Morrill regarding same;	0.20	96.05
05/05/23	Kara B. Hendricks	Follow-up with K. Ewing regarding Eco Battery issues and review and finalize letter to Eco Battery addressing concerns;	0.40	192.10
05/05/23	Christian Spaulding	Evaluate recent filings and notice of appearance of counsel for Aaron Grigsby.	0.20	63.75
05/08/23	Kara B. Hendricks	Confer with W. Welch-Kirmse regarding Montana deed and conversations with Seybert's counsel and provide receivership	0.20	96.05

05/08/23	Whitney Welch-Kirmse	order and additional background; Telephone conference with First American Title Company regarding title work for Montana residential property (.2), research property details and prior encumbrances/title work to ascertain next steps to secure property (1.1)	1.30	552.50
05/09/23	Kyle Ewing	Conference with K. Hendricks re: objections to subpoenas to cell phone carriers served by R. Madsen and the Humphries and the Receiver's position with regard to any production received from the cell phone companies in response to the subpoenas (while objections are pending)	0.20	68.00
05/09/23	Kyle Ewing	Review and analyze Humphries' objections to the receiver's subpoenas for cell phone records	0.10	34.00
05/09/23	Kara B. Hendricks	Telephone call from D. Clukey regarding phone subpoena concerns (.3); Discuss response to subpoena objections with K. Ewing (.2)	0.50	240.13
05/09/23	Kara B. Hendricks	Attention to emails regarding R. Madsen assets and revise power of attorney and follow-up with D. O'Toole regarding vehicle issues and concerns raised regarding house (.3), Correspond with J. McGraw and G. Winkler regarding same (.2)	0.50	240.13
05/09/23	Kara B. Hendricks	Respond to email from D. Heish and follow-up with C. Fronk and G. Winkler to discuss Tanner and C. Madsen issues;	0.20	96.05
05/10/23	Kyle Ewing	Legal research and analysis re: effect of certain defendants' objections on the receiver's subpoenas to the cell phone companies	0.20	68.00
05/10/23	Kyle Ewing	Preliminary review of S. Johnson's objections to subpoenas from receiver (.2), email communication with K. Hendricks re: the same (.1), confer with K. Hendricks re: effect of objections on subpoenas and further research required, as well as other outstanding items and tasks and begin same (.6)	0.90	306.00
05/10/23	Kyle Ewing	Preliminary review of Verizon's response to receiver's subpoena	0.10	34.00
05/10/23	Kara B. Hendricks	Telephone call with C. Jorgensen regarding county tax position and request for AG guidance;	0.20	96.05
05/10/23	Kara B. Hendricks	Telephone call with G. Winkler to discuss defendant request, including R. Madsen, C. Madsen and J. Jenne asset recovery efforts and related matters;	0.40	192.10
05/10/23	Kara B. Hendricks	Confer with G. Winkler and C. Fronk regarding defendant requests, including R. Madsen and C. Madsen, asset recovery efforts and forensic accounting expectations;	0.60	288.15

05/10/23	Kara B. Hendricks	Attention to email with objections to subpoenas and correspond with K. Ewing regarding same;	0.40	192.10
05/11/23	Kyle Ewing	Finish legal research and analysis re: effect of certain defendants' objections on the receiver's subpoenas to the cell phone companies and email communication with K. Hendricks re: the same	0.50	170.00
05/11/23	Kara B. Hendricks	Follow-up with T. Elson regarding J. Jenne turnover (.1); Prepare detailed email to J. Giradino regarding C. Madsen turnover concerns (.5)	0.60	288.15
05/11/23	Kara B. Hendricks	Correspond with D. O'Toole regarding R. Madsen turnover issues and follow-up with B. Tranquillo;	0.20	96.05
05/11/23	Kara B. Hendricks	Attention to Verizon request and follow-up with G. Winkler regarding fee request (.3); Request R. Santos assistance in review of phone subpoena objections to assess viability and next steps and provide background regarding same (.4);	0.70	336.18
05/11/23	Kara B. Hendricks	Attention to email from B. Tranquillo and follow-up regarding Harley pick-up plan and related issues;	0.10	48.03
05/11/23	Kara B. Hendricks	Participate in team call to discuss asset recover, communication with defendants, forensic accounting and related issues (G. Winkler, A. Priebe, J. del Castillo, M. Pham and others on call);	0.40	192.10
05/12/23	Kara B. Hendricks	Communicate with B. Tranquillo regarding Madsen assets;	0.10	48.03
05/12/23	Whitney Welch-Kirmse	Telephone conference with Dorinda Gray with Insured Titles regarding process to record Deed of Trust in Montana and to discuss lender's policy.	0.80	340.00
05/15/23	Kara B. Hendricks	Correspond with A. Ramos regarding subpoena to T-Mobile; Request S. Morrill assistance with formatting request;	0.10	48.03
05/15/23	Kara B. Hendricks	Review emails from T. Elson regarding J. Jenne and request J. McGraw assistance getting information regarding value of residence and next steps to sale same;	0.30	144.08
05/15/23	Kara B. Hendricks	Review email and draft stipulation relating to document subpoenas relating to the Grigsby Iolta and respond to email from D. Kajoka regarding same;	0.10	48.03
05/15/23	Kara B. Hendricks	Call with J. Hall, D. Zaro and M. Barkhanoy regarding defendant accounts records and documents provided (.6); Follow-up with M. Barkhanoy regarding list provided of additional defendant related entities and scope of information request (.2);	0.80	384.20
05/15/23	Steph Morrill	Prepare Exhibit 2 of T-Mobile subpoena as .CSV file and provide to K.Hendricks to forward onto Ashley Ramos, Specialist with Case Management for T-Mobile;	0.10	17.50

05/15/23	Rowena Santos	Review and analyze email from K. Hendricks regarding general facts of the case, subpoenas and objections, and requested research regarding the same.	0.40	170.00
05/15/23	Whitney Welch-Kirmse	Review current Deed of Trust on Montana Property (Guaranteed Rate, Inc.), draft second Deed of Trust.	4.80	2,040.00
05/16/23	Jodi Goodheart	Review incoming documents and proposed deed of trust; request additional information from K. Hendricks, W. Welch-Kirmse.	0.70	583.10
05/16/23	Kara B. Hendricks	Review motion to dismiss filed by US Attorney's Office (.1); Attention to email from C. Jorgenson regarding transfer tax issues and update G. Winkler (.1);	0.20	96.05
05/16/23	Kara B. Hendricks	Attention to email from J. McGraw regarding potential sale of Jenne property (.1);	0.10	48.03
05/17/23	Kyle Ewing	Conference/email communication with K. Hendricks and R. Santos re: objections to cell phone carrier subpoenas and receiver's responses to the objections and strategic options for narrowing the same (.6), discuss other outstanding items with K. Hendricks in preparation for tomorrow's team call with AFS and AM (.3)	0.90	306.00
05/17/23	Jodi Goodheart	Review applicable documents regarding Seybert and Montana property transfer to trust; confer with K. Hendricks and W. Welch-Kirmse regarding lis pendens.	0.50	416.50
05/17/23	Kara B. Hendricks	Review subpoena joinders and conduct research on initial issues (.5); Follow-up with R. Santos regarding next steps and provide context (.4) ; Follow-up with G. Winkler regarding information from Verizon on costs for response (.1); Intial review of objections from T. Mobile (.1);	1.10	528.28
05/17/23	Kara B. Hendricks	Communicate with B. Tranquillo regarding pick-up of Madsen's Harley and follow-up with D. Toole (.3); Follow-up regarding Montana property security (.1);	0.40	192.10
05/17/23	Kara B. Hendricks	Discuss procedural issues regarding Montana property with J. Goodheart and W. Welch-Kirmse; Follow-up with L. Maningo regarding family trust;	0.40	192.10
05/17/23	Steph Morrill	Provide project status to K.Hendricks regarding the consolidation of competeing and near-duplicate records uploaded to Box, and generation of corresponding document log.	0.10	17.50
05/17/23	Rowena Santos	Exchange emails and teleconference with K. Hendricks regarding general facts of the case, receivership, the breadth of the subpoenas, and narrowing the same to address/resolve objections.	0.80	340.00
05/18/23	Kyle Ewing	Participate in weekly team meeting with AFS (G. Winkler and others) and AM (D.	1.00	340.00

		Zaro and others), including discussion of cell phone subpoenas; recent asset acquisitions; ongoing dispute with Grigsby and recent communications with P. Beasley re: Grigsby; forensic reporting progress; and related items (0.6); follow up with K. Hendricks (0.4)		
05/18/23	Kara B. Hendricks	Review notice to investors and correspond with G. Winkler regarding same;	0.30	144.08
05/18/23	Kara B. Hendricks	Attention to emails regarding value of J. Jenne property and communication with J. Elson; Correspond with G. Winkler regarding SEC inquiry;	0.20	96.05
05/18/23	Kara B. Hendricks	Attend portion of J&J team call to discuss asset recovery efforts and communication with counsel (G. Winkler, J. del Castillo, K. Ewing, A. Priebe and others participating) and follow-up with K. Ewing regarding next steps and division of work;	0.70	336.18
05/18/23	Kara B. Hendricks	Attention to email from E. Mason regarding phone subpoena (.1); Return call to S. Boyd regarding subpoena(.1); Telephone call from D. Gomez regarding subpoena(.1); Create document to track communication regarding third party subpoena questions and include and request R. Santos conduct additional research and analysis regarding same (.8);	1.10	528.28
05/18/23	Rowena Santos	Exchange emails with K. Hendricks regarding notice of subpoena to consumers and response to subpoena (objections v. motion).	0.10	42.50
05/18/23	Rowena Santos	Research whether notice needs to be provided to account holder for purposes of a subpoena for telephone records and the response to a subpoena (objections v. motion).	0.50	212.50
05/19/23	Kara B. Hendricks	Respond to questions from R. Santos regarding subpoena issues;	0.20	96.05
05/19/23	Kara B. Hendricks	Revise draft stipulation regarding confidentiality of Grigsby bank records and correspond with his counsel regarding concerns;	1.10	528.28
05/19/23	Kara B. Hendricks	Correspond with D. O'Toole and B. Tranquillo regarding pick-up; Review emails regarding document concerns;	0.10	48.03
05/19/23	Kara B. Hendricks	Follow-up with C. Spaulding regarding C. Madsen concerns an potential motion to compel;	0.10	48.03
05/19/23	Rowena Santos	Exchange emails with K. Hendricks regarding source of telephone numbers, discussions with account holders, and possible list of questions to ask account holders.	0.20	85.00
05/19/23	Christian Spaulding	Communications with K. Hendricks regarding status of Madsen production and need for Motion to Compel.	0.20	63.75

05/19/23	Whitney Welch-Kirmse	Research Montana law applicable to Lis Pendens; Draft Notice of Lis Pendens for Montant Property (Seybert); Correspond with Insured Titles to confirm recording requirements.	2.10	892.50
05/22/23	Kyle Ewing	Conference with K. Hendricks re: receivership tasks for the week, including continued efforts to narrow subpoenas to cell phone carriers and discussions with counsel for A. Grigsby re: stipulating to a protective order governing use of subpoenaed IOLTA records	0.20	68.00
05/22/23	Kara B. Hendricks	Telephone call with Grigsby's counsel regarding confidentiality agreement and follow-up with co-counsel for template utilized;	0.30	144.08
05/22/23	Kara B. Hendricks	Telephone call with J. McGraw regarding R. Madsen and J. Jennee assets and next steps;	0.30	144.08
05/22/23	Kara B. Hendricks	Attention to emails regarding R. Madsen pick-up; Follow-up with B. Trujillo;	0.20	96.05
05/23/23	Kara B. Hendricks	Telephone call from C. Jorgensen regarding tax appeal issue and prepare detailed email to G. Winkler with supporting documents for further discussion;	0.40	192.10
05/23/23	Kara B. Hendricks	Attention to email from J. Giradino regarding C. Madsen and follow-up with G. Winkler;	0.10	48.03
05/23/23	Kara B. Hendricks	Attention to emails relating to funds from EcoBattery;	0.20	96.05
05/23/23	Kara B. Hendricks	Telephone call with G. Winkler regarding attorney/client privilege waiver (.2); Follow-up with AM team regarding prior research and respond to inquiries (.3); Begin analyzing relevant issues relating to same (.4);	0.90	432.23
05/24/23	Kara B. Hendricks	Work with B. Tranquilo regarding R. Madsen pick-up issues (.1); Follow-up with C. Spaulding regarding C. Madsen motion (.1);	0.20	96.05
05/24/23	Kara B. Hendricks	Review communication with Allen Matkins regarding waiver of privilege (.2); Review case law and receivership order (.3); Follow-up with G. Winkler (.1); Draft correspondence to D. Scheiss regarding privilege (.6); Telephone call with G. Winkler and prepare second letter to address issues raised (.4);	1.60	768.40
05/24/23	Christian Spaulding	Evaluate communications from team regarding waiver of attorney client privilege and authority in support of the same.	1.00	318.75
05/25/23	Kara B. Hendricks	Participate in call with G. Winkler and others from AFS team, D. Zaro and C. Spaulding regarding forensic accounting, communication with defendants and asset	0.30	144.08

		recovery matters;		
05/25/23	Christian Spaulding	Participate in weekly update call.	0.30	95.63
05/25/23	Christian Spaulding	Gather and evaluate prior communications, productions, and filings by C. Madsen in preparation of Motion to Compel.	3.50	1,115.63
05/26/23	Kara B. Hendricks	Correspond with C. Spaulding regarding C. Madsen motion to compel;	0.20	96.05
05/26/23	Kara B. Hendricks	Review emails and prepare agreement for turnover of Jenne property; and follow-up with J. McGraw regarding same;	0.80	384.20
05/26/23	Christian Spaulding	Begin draft of Motion to Compel re: C. Madsen.	4.20	1,338.75
05/26/23	Christian Spaulding	Continue analysis of documents and information related to C. Madsen and draft of Motion to Compel pertaining to the same.	4.60	1,466.25
05/29/23	Christian Spaulding	Continue draft of Motion to Compel Re; C. Madsen.	1.50	478.13
05/30/23	Kara B. Hendricks	Follow-up with G. Winkler regarding narrowing phone carrier subpoenas (.1); Attention to email from L. Jeffery regarding stock account and review of prior data and follow-up with G. Winkler regarding same (.2);	0.30	144.08
05/30/23	Kara B. Hendricks	Respond to C. Spaulding inquiries regarding C. Madsen motion;	0.20	96.05
05/30/23	Kara B. Hendricks	Review emails regarding Jenne property and turnover and correspond with T. Elson and G. Winkler regarding same;	0.40	192.10
05/30/23	Kara B. Hendricks	Attention to email from K. Dean and follow-up with G. Winkler;	0.10	48.03
05/30/23	Christian Spaulding	Finalize draft of Motion to Compel Re: C. Madsen and confer with K. Hendricks regarding the same.	3.80	1,211.25
05/31/23	Kara B. Hendricks	Confer with G. Winkler and J. McGraw regarding J. Jenne property, Seybert Montana property, R. Madsen next steps, L Jeffries request and C. Madsen motion;	0.40	192.10
05/31/23	Kara B. Hendricks	Respond to email from T. Elson regarding J. Jenne house turnover;	0.20	96.05
05/31/23	Kara B. Hendricks	Correspond with C. Fronk regarding discovery extension and forensic accounting;	0.10	48.03

Total Hours: 81.80

Total Amount: \$ 32,598.25

TIMEKEEPER SUMMARY FOR TASK CODE GW001,

ASSET ANALYSIS AND RECOVERY

Summary of Fees (Standard Rates)

<u>Timekeeper Name</u>	<u>Hours Billed</u>	<u>Standard Rate</u>	<u>Total \$ Amount</u>
Jodi Goodheart	1.20	980.00	1,176.00
Kara B. Hendricks	29.20	610.00	17,812.00
Kyle Ewing	11.90	450.00	5,355.00
Rowena Santos	2.00	800.00	1,600.00
Christian Spaulding	26.90	395.00	10,625.50
Whitney Welch-Kirmse	9.00	500.00	4,500.00
Steph Morrill	1.60	295.00	472.00
Totals:	81.80	507.83	\$ 41,540.50

Summary of Fees (Discounted Rates)

<u>Timekeeper Name</u>	<u>Hours Billed</u>	<u>Average Discounted Rate</u>	<u>Total \$ Amount</u>
Jodi Goodheart	1.20	833.00	999.60
Kara B. Hendricks	29.20	480.25	14,023.27
Kyle Ewing	11.90	340.00	4,046.00
Rowena Santos	2.00	425.00	850.00
Christian Spaulding	26.90	318.75	8,574.38
Whitney Welch-Kirmse	9.00	425.00	3,825.00
Steph Morrill	1.60	175.00	280.00
Totals:	81.80	398.51	\$ 32,598.25

TASK CODE: GW003 BUSINESS OPERATIONS

<u>DATE</u>	<u>TIMEKEEPER</u>	<u>DESCRIPTION</u>	<u>HOURS</u>	<u>AMOUNT</u>
05/15/23	Jennifer Rohrbach	Prepared annual report for J & J Consulting Services, Inc. to be filed with the Nevada Secretary of State.	0.60	105.00
05/31/23	Jennifer Rohrbach	Reviewed and filed 2023 annual report for J & J Consulting Services, Inc. with Nevada Secretary of State.	0.50	87.50
Total Hours:			1.10	
Total Amount:				\$ 192.50

TIMEKEEPER SUMMARY FOR TASK CODE GW003,

BUSINESS OPERATIONS

Summary of Fees (Standard Rates)

<u>Timekeeper Name</u>	<u>Hours Billed</u>	<u>Standard Rate</u>	<u>Total \$ Amount</u>
Jennifer Rohrbach	1.10	285.00	313.50
Totals:	1.10	285.00	\$ 313.50

Summary of Fees (Discounted Rates)

<u>Timekeeper Name</u>	<u>Hours Billed</u>	<u>Average Discounted Rate</u>	<u>Total \$ Amount</u>
Jennifer Rohrbach	1.10	175.00	192.50
Totals:	1.10	175.00	\$ 192.50

TASK CODE: GW004 CASE ADMINISTRATION

<u>DATE</u>	<u>TIMEKEEPER</u>	<u>DESCRIPTION</u>	<u>HOURS</u>	<u>AMOUNT</u>
05/04/23	Steph Morrill	Continue review of records received by GT and uploaded to Box by C.Ney;	1.80	315.00
05/05/23	Steph Morrill	Conference with K.Hendricks regarding review of documentation and records, so far received by Receiver, requested by AFS;	0.30	52.50
05/09/23	Kara B. Hendricks	Correspond with J. McGraw regarding SOS filings and work with paralegals on follow-up;	0.10	48.03
05/09/23	Christian Spaulding	Confer with team regarding utilization of services by Aitheras to date.	0.20	63.75
05/10/23	Kara B. Hendricks	Follow-up with W. Welch-Kirmse regarding deed of trust for Seybert property (.1), Attention to emails from Montana title company and respond to email from L. Maningo regarding document status for Seybert property (.2)	0.30	144.08
05/11/23	Steph Morrill	Draft and send status update to Milana Barkhanoy regarding upload of documentation and records received by the Receiver, and request for a log of the same, to track date of records received, from whom the records were received, and which party is associated;	0.10	17.50
05/11/23	Steph Morrill	Continue to generate document log of records received by GT and uploaded to Box by C.Ney;	1.50	262.50
05/12/23	Steph Morrill	Continue review and unification of competing and near duplicate documentation sets, uploaded on behalf of GT, within Box (Titled "209375_010100_Discovery" and "Discovery"), and simultaneously continue document index generation, including received date, received from, and affiliated party.	0.20	35.00
05/13/23	Steph Morrill	Continue review and unification of competing and near duplicate documentation sets, uploaded on behalf of GT, within Box (Titled "209375_010100_Discovery" and "Discovery"), and simultaneously continue document index generation, including received date, received from, and affiliated party	2.40	420.00
05/14/23	Kara B. Hendricks	Review emails and correspond with team regarding document issues;	0.10	48.03
05/15/23	Kara B. Hendricks	Follow-up with J. Rohrbach regarding filings required with the Secretary of State for J&J Consulting;	0.10	48.03
05/15/23	Kara B. Hendricks	Confer with M. Barkhanoy and S. Morrill	0.40	192.10

		regarding documents received from defendants and utilization of same to avoid duplicative efforts between receivership teams;		
05/15/23	Steph Morrill	Continue review and unification of competing and near duplicate documentation sets, uploaded on behalf of GT, within Box (Titled "209375_010100_Discovery" and "Discovery"), and simultaneously continue document index generation, including received date, received from, and affiliated party;	4.00	700.00
05/15/23	Steph Morrill	Teams Call with Milana Barkhanoy, Grace Radke, and K.Hendricks regarding the status of project related to the documentation received from Defendants and uploaded by GT (or on behalf of GT) into Box, the organization necessary to prepare for upload into Relativity, and the unification necessary to the two competing and nearly-duplicative sets (titled "209375_010100_Discovery", and "Discovery") (.8); Post-call meeting with K.Hendricks (.1);	0.90	157.50
05/16/23	Kara B. Hendricks	Review annual list for J&J and follow-up with J. McGraw regarding finalizing and filing same;	0.10	48.03
05/17/23	Steph Morrill	Review email correspondence from Milana Barkhanoy regarding document log and Box unification project, draft and send response summarizing understanding of project.	0.50	87.50
05/18/23	Steph Morrill	Complete unification of competing and near duplicate documentation sets, uploaded on behalf of GT, within Box (Titled "209375_010100_Discovery" and "Discovery"), and continue document index generation, including received date, received from, and affiliated party;	1.80	315.00
05/19/23	Steph Morrill	Having completed unification of competing upload sets, halt effort to identify Date Received and Received From information for records which remain unorganized within Box, and prepare GT Received Records and Box Document index at current stage, for distribution to Milana Barkhanoy, Grace Radke, John Hall, Joshua del Castillo, and K.Hendricks; Draft cover email with key points for understanding log, and status thereof, and send to distribution group;	3.80	665.00
05/23/23	Steph Morrill	Review matter correspondence and email correspondence to identify cover emails for document transfers from Defendants in order to match against remaining, unorganized records uploaded by GT into	1.00	175.00

05/25/23	Steph Morrill	Box. Continue review of matter correspondence and email correspondence to identify cover emails for document transfers from Defendants in order to match against remaining, unorganized records uploaded by GT into Box.	1.90	332.50
05/25/23	Steph Morrill	Correspond with Milana Barkhanoy, Grace Radke, and Anna Priebe of AFS, and K.Hendricks regarding Box review and update regarding efforts;	0.40	70.00
05/26/23	Steph Morrill	Based on Order Appointing Receiver, calculate and calendar reminders for next quarterly status reports, preparing fees to send to the SEC, and filing fee applications, for the next 4 quarters;	0.70	122.50
05/26/23	Steph Morrill	Continue review of matter correspondence and email correspondence to identify cover emails for document transfers from Defendants in order to match against remaining, unorganized records uploaded by GT into Box.	2.00	350.00
05/30/23	Kara B. Hendricks	Follow-up with G. Winkler and J. McGraw regarding secretary of state filing;	0.10	48.03
05/31/23	Steph Morrill	Focusing on Coinbase, Grand Desert Behavior, Chris Humphries and Danny Seybert, unorganized record sets (.5), Continue effort to identify Date Received and Received From information and simultaneously, update the GT Received Records and Box Document Index (1.6);	2.10	367.50
Total Hours:			26.80	
Total Amount:				\$ 5,085.08

TIMEKEEPER SUMMARY FOR TASK CODE GW004,

CASE ADMINISTRATION

Summary of Fees (Standard Rates)

<u>Timekeeper Name</u>	<u>Hours Billed</u>	<u>Standard Rate</u>	<u>Total \$ Amount</u>
Kara B. Hendricks	1.20	610.00	732.00
Christian Spaulding	0.20	395.00	79.00
Steph Morrill	25.40	295.00	7,493.00
Totals:	26.80	309.85	\$ 8,304.00

Summary of Fees (Discounted Rates)

<u>Timekeeper Name</u>	<u>Hours Billed</u>	<u>Average Discounted Rate</u>	<u>Total \$ Amount</u>
Kara B. Hendricks	1.20	480.28	576.33
Christian Spaulding	0.20	318.75	63.75
Steph Morrill	25.40	175.00	4,445.00
Totals:	26.80	189.74	\$ 5,085.08

TASK CODE: GW005 CLAIMS ADMINISTRATION AND OBJECTIONS

<u>DATE</u>	<u>TIMEKEEPER</u>	<u>DESCRIPTION</u>	<u>HOURS</u>	<u>AMOUNT</u>
05/05/23	Kara B. Hendricks	Correspond with M. Pham regarding Grigsby request for confidentiality agreement;	0.10	48.03
Total Hours:			0.10	
Total Amount:				\$ 48.03

TIMEKEEPER SUMMARY FOR TASK CODE GW005.

CLAIMS ADMINISTRATION AND OBJECTIONS

Summary of Fees (Standard Rates)

<u>Timekeeper Name</u>	<u>Hours Billed</u>	<u>Standard Rate</u>	<u>Total \$ Amount</u>
Kara B. Hendricks	0.10	610.00	61.00
Totals:	0.10	610.00	\$ 61.00

Summary of Fees (Discounted Rates)

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

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

<u>Timekeeper</u>	<u>Hours</u>	<u>Rate</u>	<u>Amount</u>
Jodi Goodheart	1.20	980.00	1,176.00
Kara B. Hendricks	30.50	565.00	17,232.50
Kyle Ewing	11.90	400.00	4,760.00
Rowena Santos	2.00	500.00	1,000.00
Christian Spaulding	27.10	375.00	10,162.50
Whitney Welch-Kirmse	9.00	500.00	4,500.00
Steph Morrill	27.00	295.00	7,965.00
Jennifer Rohrbach	1.10	285.00	313.50
Totals:	109.80		\$ 47,109.50

Summary of Fees (Discounted Rates)

<u>Timekeeper</u>	<u>Hours</u>	<u>Rate</u>	<u>Amount</u>
Jodi Goodheart	1.20	833.00	999.60
Kara B. Hendricks	30.50	480.25	14,647.63
Kyle Ewing	11.90	340.00	4,046.00
Rowena Santos	2.00	425.00	850.00
Christian Spaulding	27.10	318.75	8,638.13
Whitney Welch-Kirmse	9.00	425.00	3,825.00
Steph Morrill	27.00	175.00	4,725.00
Jennifer Rohrbach	1.10	175.00	192.50
Totals:	109.80		\$ 37,923.86

Invoice No.: 1000340006
 Re: SEC v. Beasley (Geoff Winkler, Receiver)
 Matter No.: 209375.010100

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Description of Expenses Billed:

<u>DATE</u>	<u>DESCRIPTION</u>		<u>AMOUNT</u>
04/04/23	VENDOR: LAC Group LLC - ACH INVOICE#: IN29156 DATE: 5/1/2023 Conduct research to obtain the docket and filing #13 in the case Nolan v. Jeffery; utilizing Orange County Superior (CA) Court; for C. Ney. - Service Date: 4/4/23 Req.'d by Tomczyk, Joseph M. - File Ref: 209375.010100	\$	8.69
04/28/23	VENDOR: United Parcel Service, Inc.(UPS) - ACH INVOICE#: 00050623416 DATE: 5/6/2023 Trk'ing No. 1Z451W692497988669 / Next Day Air Commercial from Greenberg Traurig Llp Suzanne Williams to Greenberg Traurig, Llp Evy Escobar-Gaddi on 4/28/2023 - 209375.010100	\$	22.64
05/01/23	VENDOR: Nationwide Legal, LLC (4527) - ACH INVOICE#: 00000057285 DATE: 5/15/2023 STANDARD PROCESS (48 to 72 HRS) - AT&T Mobility, LLC, 701 S. Carson Street, Suite 200, Carson City NV on 5/1/23 Req'd by/for Morrill, Steph	\$	140.00
05/01/23	VENDOR: Nationwide Legal, LLC (4527) - ACH INVOICE#: 00000057285 DATE: 5/15/2023 STANDARD PROCESS (48 to 72 HRS) - T-Mobile USA, Inc., 112 N. Curry Street, Carson City NV on 5/1/23 Req'd by/for Morrill, Steph	\$	140.00
05/01/23	VENDOR: Nationwide Legal, LLC (4527) - ACH INVOICE#: 00000057285 DATE: 5/15/2023 STANDARD PROCESS (48 to 72 HRS) - Verizon Services Corp., 701 S. Carson Street, Suite 200, Carson City NV on 5/1/23 Req'd by/for Morrill, Steph	\$	65.00
		Total Expenses:	\$ 376.33



Invoice No. : 1000395478
 File No. : 209375.010100
 Bill Date : August 14, 2023

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

Attn: Geoff Winkler

INVOICE

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

THIS INVOICE REPLACES INVOICE 1000312069

	Total Fees:	\$	58,700.69
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Expenses:

Local Travel	565.60	
Subpoenas	65.00	
Travel and Lodging Out of Town	581.35	

	Total Expenses:	\$	1,211.95
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	Current Invoice:	\$	59,912.64
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	Previous Balance (see attached statement):	\$	176,994.70
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	Total Amount Due:	\$	236,907.34
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KBH:TKK

Tax ID: 13-3613083



Invoice No.: 1000395478
File No. : 209375.010100

REMITTANCE ADVICE

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

CLIENT NAME: WINKLER, GEOFF
FILE NUMBER: 209375.010100
INVOICE NUMBER: 1000395478*
BILLING PROFESSIONAL: Kara B. Hendricks

Current Invoice:	\$	59,912.64
Previous Balance:	\$	176,994.70
Total Amount Due:	\$	236,907.34

FOR YOUR CONVENIENCE, WIRE TRANSFER FUNDS TO:

For Wire Instructions:

Bank: WELLS FARGO BANK
ABA #: 121000248

For ACH Instructions:

Bank: WELLS FARGO BANK
ABA#: 063107513

CREDIT TO: GREENBERG TRAUIG DEPOSITORY ACCOUNT
ACCOUNT #: 2000014648663

PLEASE

REFERENCE: **CLIENT NAME:** WINKLER, GEOFF
FILE NUMBER: 209375.010100
INVOICE NUMBER: 1000395478*
BILLING
PROFESSIONAL: Kara B. Hendricks

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

Greenberg Traurig
PO Box 936769
ATLANTA GA 31193-6769

Wire fees may be assessed by your bank.

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

KBH:TKK
Tax ID: 13-3613083



Invoice No. : 1000395478
File No. : 209375.010100

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

KBH:TKK

Tax ID: 13-3613083



Invoice No. : 1000395478
 File No. : 209375.010100

Account Statement

<u>Date</u>	<u>Invoice #</u>	<u>Fees Due</u>	<u>Expenses Due</u>	<u>Other Due</u>	<u>Total Due</u>
07/19/22	1000035547	16,627.52	0.00	0.00	16,627.52
10/03/22	1000096060	12,029.69	0.00	0.00	12,029.69
11/09/22	1000142381	16,674.86	0.00	0.00	16,674.86
11/09/22	1000142507	8,666.16	0.00	0.00	8,666.16
02/14/23	1000224348	14,644.91	0.00	0.00	14,644.91
02/14/23	1000224438	12,682.94	0.00	0.00	12,682.94
02/14/23	1000224498	11,834.06	0.00	0.00	11,834.06
05/15/23	1000315147	6,912.96	0.00	0.00	6,912.96
05/15/23	1000315185	7,047.65	0.00	0.00	7,047.65
06/09/23	1000340006	37,923.86	376.33	0.00	38,300.19
07/10/23	1000358210	31,545.76	28.00	0.00	31,573.76
	Totals:	\$ 176,590.37	\$ 404.33	\$ 0.00	\$ 176,994.70

KBH:TKK

Tax ID: 13-3613083

Description of Professional Services Rendered:

TASK CODE: GW001 ASSET ANALYSIS AND RECOVERY

<u>DATE</u>	<u>TIMEKEEPER</u>	<u>DESCRIPTION</u>	<u>HOURS</u>	<u>AMOUNT</u>
04/02/23	Christian Spaulding	Evaluate and document funds actually demonstrated through Grigsby's second production of documents as compared to amounts purportedly received by P. Beasley and spreadsheet regarding the same. Confer with team as to inclusion in Motion for Order to Show Cause.	1.50	478.12
04/03/23	Kyle Ewing	Discuss Madsen subpoena request and issues with lawsuit related to L. Jeffries pending in California and plaintiff's counsel's failure to stay the case despite receiving several notices of the receivership	0.20	68.00
04/03/23	Kyle Ewing	Review analysis of latest Grigsby document production provided by C. Spaulding in preparation for reviewing and editing draft renewed motion regarding the deficiency of the same	0.20	68.00
04/03/23	Kara B. Hendricks	Respond to email from D. Clukey regarding call to discuss Johnson and Rohner issues;	0.10	48.03
04/03/23	Kara B. Hendricks	Review court filings relating to L. Jeffery, request C. Ney's assistance obtaining additional information regarding CA proceeding; Follow-up with L. Jeffery regarding same;	0.40	192.10
04/03/23	Kara B. Hendricks	Attention to emails from C. Spaulding and K. Ewing regarding Grigsby/Paula Beasley document review motion and related follow-up regarding next steps;	0.40	192.10
04/03/23	Kara B. Hendricks	Meet with Ben Tranquillo, turnover Beasley watches and discuss other assets to be provided by Defendants and timing of same and send and review follow-up emails;	0.70	336.18
04/03/23	Kara B. Hendricks	Attention to emails from A. Deering and J. del Castillo regarding pending litigation matters including responding to inquiry regarding appeal filed to Ninth Circuit by intervenor's;	0.30	144.08
04/03/23	Kara B. Hendricks	Attention to emails from G. Winkler regarding pending litigation against defendants and promoters and telephone call to discuss same;	0.40	192.10
04/03/23	Kara B. Hendricks	Discuss investor questionnaire with G. Winkler and review and respond to email from A. Priebe regarding same;	0.20	96.05

04/03/23	Kara B. Hendricks	Review subpoena requirements and follow-up with G. Winkler regarding D. O'Toole subpoena inquiry and draft proposed response to same;	0.30	144.08
04/03/23	Kara B. Hendricks	Prepare draft response letter to J. Piskel regarding threatened lawsuit against P. LaJiness, review receivership order and stay language and follow-up with G. Winkler to get additional information regarding same;	1.00	480.25
04/03/23	Christian Spaulding	Evaluate amounts actually demonstrated through production of documents and information by A. Grigsby(2.1); Draft summary of the same to team and inquire on status(1.4).	3.50	1,115.62
04/03/23	Christian Spaulding	Emails with team regarding additional points and strategy for Motion for Order to Show Cause Re: A. Grigsby and P. Beasley.	0.30	95.62
04/04/23	Kyle Ewing	Continue researching law re: limited participation of receiver in discovery under Nevada/Ninth Circuit precedent in light of counsel for R. Madsen indicating Madsen intends to improperly seek discovery from the Receiver	2.90	986.00
04/04/23	Kara B. Hendricks	Correspond via email with D. O'Toole regarding R. Madsen turnover and related issues;	0.10	48.03
04/04/23	Kara B. Hendricks	Review available information from J. Jenne (.2); Telephone call with T. Elson and G. Winkler regarding Jenne compliance and turnover (.5); Send follow-up email to T. Elson with pleadings requested(.3);	1.00	480.25
04/04/23	Cynthia L. Ney	Review file regarding Jason Jenne documentation and communications with K.Hendricks regarding same.	0.20	35.00
04/04/23	Cynthia L. Ney	Research regarding Nolan v. Larry Jeffery matter (.3); communications with K.Hendricks regarding same (.1).	0.40	70.00
04/05/23	Kyle Ewing	Begin drafting demand letters to EcoBattery re: promissory notes; communication with K. Hendricks re: the same	0.20	68.00
04/05/23	Kyle Ewing	Preliminary review of R. Madsen subpoena; email communication with G. Winkler re: the same	0.20	68.00
04/05/23	Kara B. Hendricks	Attention to email from L. Maningo regarding Seybert turnover and follow-up with G. Winkler regarding documentation and moving forward;	0.20	96.05
04/05/23	Kara B. Hendricks	Attention to emails from D. O'Toole regarding R. Madsen turnover and provide updated information to B. Tranquillo (.3); Telephone call with D. O'Toole to discuss Madsen turnover (.5); Prepare email to A. Deering and B. Tranquillo regarding additional information and pick-up plan	1.20	576.30

04/05/23	Kara B. Hendricks	(.4); Initial review of subpoena and discovery from D. O'Toole;	0.10	48.03
04/05/23	Kara B. Hendricks	Correspond with G. Winkler regarding Beasley turnover and information request by his counsel;	0.20	96.05
04/05/23	Kara B. Hendricks	Review and respond emails from G. Winkler regarding Eco Battery funds and emails from L. Abbott regarding meeting;	0.20	96.05
04/06/23	Kyle Ewing	Confer with K. Hendricks re: letter to counsel in L. Jeffery's ancillary proceeding re: violation of the stay	0.10	34.00
04/06/23	Kyle Ewing	Follow-up conference with K. Hendricks re: contents of R. Madsen subpoena and approach to objecting to the same in preparation for quashing or limiting the overbroad/abusive subpoena	0.30	102.00
04/06/23	Kyle Ewing	Review and edit C. Spaulding's draft motion for order to show cause and for turnover from Beasley/Grigsby; communication with K. Hendricks and C. Spaulding re: the same (XX); review Grigsby document productions, prior court order, and correspondence in conjunction with the same	0.10	34.00
04/06/23	Kyle Ewing	Continue drafting EcoBattery demand letters re: JL2 Investments/Jager Trust promissory notes (2.8); review and revise the same and provide to K. Hendricks for her review (.4); revise to address comments of K. Hendricks and provide to AFS (G. Winkler) for review(.8).	4.00	1,360.00
04/06/23	Kyle Ewing	Participate in weekly receivership team call with AFS (G. Winkler, J. Hall, and others); AM (D. Zaro and M. Pham), and GT (K. Hendricks), including discussion of ongoing EcoBattery issues and demand letters, further rounds of subpoenas to be issued and enforcement of previously issued subpoenas, handling of documents, and subpoenas received from party defendants; follow-up with K. Hendricks	1.00	340.00
04/06/23	Kara B. Hendricks	Finalize correspondence to J. Piskel address concerns regarding violation of stay order and drain on receivership assets;	0.40	192.10
04/06/23	Kara B. Hendricks	Review court documents regarding Nolan v. Jeffery matter and prepare correspondence to attorney Shields (.5); Update L. Jeffrey and follow-up regarding meeting to discuss assets (.1);	0.60	288.15
04/06/23	Kara B. Hendricks	Attention to emails and documents provided regarding assets including Seybert Montana property and R. Madsen Utah cabin;	0.40	192.10
04/06/23	Kara B. Hendricks	Revise demand letter to Eco Battery regarding Jager note and follow-up with K. Ewing regarding same;	0.70	336.18

04/06/23	Kara B. Hendricks	Participate in team call to discuss status of forensic accounting, tax issues, communication with defendants, asset recovery efforts, third party claims, division of work and next steps (G. Winkler, J. Hall, A. Deering, K. Ewing, D. Zaro, J. del Castillo and other participants);	1.00	480.25
04/06/23	Kara B. Hendricks	Correspond with K. Ewing regarding JL2 assignment and demand for payment to Eco Battery;	0.20	96.05
04/06/23	Kara B. Hendricks	Review R. Madsen subpoena and compare with discovery requests made to the SEC;	0.20	96.05
04/06/23	Kara B. Hendricks	Draft declaration relating to cooperation from M. Beasley, review protective order relating to bank records and correspond with G. Winkler regarding same;	0.80	384.20
04/06/23	Kara B. Hendricks	Meet with S. Morrill and C. Ney and discuss projects needing assistance including follow-up regarding defendant asset recovery letters, attorney retention turnover and asset lists.	0.90	432.23
04/06/23	Steph Morrill	Engage in team meeting to discuss matter status and priority task assignments with K.Hendricks and C.Ney;	0.50	87.50
04/06/23	Cynthia L. Ney	Analysis and electronic organization of defendant documentation.	0.40	70.00
04/06/23	Cynthia L. Ney	Analysis of files and compilation of materials for K.Hendricks' review.	0.30	52.50
04/06/23	Christian Spaulding	Continue draft of Motion for Order to Show Cause and consideration of documents and information produced by A. Grigsby.	7.50	2,390.62
04/07/23	Kara B. Hendricks	Attention to email from L. Jeffrey and follow-up with G. Winkler regarding meeting to discuss asset recovery;	0.10	48.03
04/07/23	Kara B. Hendricks	Follow-up with C. Spaulding regarding Grigsby motion and subpoenas response;	0.50	240.13
04/07/23	Kara B. Hendricks	Update G. Winkler and A. Deering regarding communication with K. Dean and missing funds;	0.10	48.03
04/07/23	Kara B. Hendricks	Attention to emails regarding subpoena from Wells Fargo to receiver and coordinate efforts;	0.20	96.05
04/07/23	Kara B. Hendricks	Attention to emails from A. Deering and D. O'Toole regarding bus inspection, vehicle pick-up and related follow-up;	0.30	144.08
04/07/23	Christian Spaulding	Gather exhibits to Motion for Order to Show Cause Re: P. Beasley and A. Grigsby.	1.10	350.62
04/07/23	Christian Spaulding	Continue and finalize draft of Motion for Order to Show Cause Re; A. Grigsby and P. Beasley.	6.80	2,167.50
04/07/23	Christian Spaulding	Strategize with K. Hendricks regarding presentation of evidence in Motion for Order to Show Cause re: A. Grigsby and P. Beasley.	0.30	95.62
04/08/23	Kyle Ewing	Email communication with G. Winkler, K.	0.20	68.00

		Hendricks, and D. Zaro re: media stories involving M. Beasley		
04/10/23	Kyle Ewing	Review and analyze pleadings filed in Beasley criminal cases in connection with evaluating invoices produced by A. Grigsby evidencing P. Beasley's use of receivership assets to pay M. Beasley's legal defense costs in support of motion for order to show cause/compelling turnover against Grisby and P. Beasley	1.00	340.00
04/10/23	Kyle Ewing	Review and provide edits to motion for order to show cause/turnover re: P. Beasley and A. Grigsby; conference with K. Hendricks re: the same and finalize motion for filing	5.30	1,802.00
04/10/23	Kyle Ewing	Review D. Zaro's email memo re: approach to discovery requests to the Receiver; conference with K. Hendricks re: the same	0.20	68.00
04/10/23	Kara B. Hendricks	Attention to email from D. Zaro regarding subpoenas and production issues; Attention to email from J. del Castillo regarding information to include in status report;	0.20	96.05
04/10/23	Kara B. Hendricks	Review C. Madsen information and file up with team regarding motion to compel;	0.10	48.03
04/10/23	Kara B. Hendricks	Correspond with D. Zaro and J. Kellogg regarding subpoena directed to Receiver;	0.10	48.03
04/10/23	Kara B. Hendricks	Attention to email from A. Deering regarding CJ Investments and related follow-up including review of proposed SOS filings;	0.30	144.08
04/10/23	Kara B. Hendricks	Review emails from D. O'Toole; Telephone call with A. Deering regarding R. Madsen assets and turnover issues;	0.20	96.05
04/10/23	Kara B. Hendricks	Review and respond to emails from A. Deering regarding Jongeward investments and case summary for status report; Follow-up with J. Jongeward to get additional investment information;	0.30	144.08
04/10/23	Kara B. Hendricks	Review and revise motion to compel and for turnover relating to Grigsby and P. Beasley and request C. Spaulding assistance with motion to seal and declarations relating to same;	3.60	1,728.90
04/10/23	Steph Morrill	Review draft motion for order to show cause regarding Paula Beasley and Ariba Grigsby and prepare index of document references, in order to begin compiling exhibits thereto; Draft and send email correspondence noting next steps and points of follow up regarding preparation of motion exhibits, to K.Hendricks and C.Spaulding;	3.10	542.50
04/10/23	Christian Spaulding	Email with team regarding potential release of M. Beasley and review of Government's request for de novo review.	0.40	127.50
04/10/23	Christian Spaulding	Draft Motion for Leave to file exhibits to	0.50	159.37

		Motion for Order to Show Cause Under Seal.		
04/10/23	Christian Spaulding	Finalize exhibits for Motion for Order to Show cause and confer with team regarding the same.	1.40	446.25
04/11/23	Kyle Ewing	Review D. Zaro's analysis of subpoena procedure and discovery plan for receiver in preparation for today's calls re: the same; confer with K. Hendricks re: the same	0.30	102.00
04/11/23	Kyle Ewing	Conference with K. Hendricks and C. Spaulding re: motion to compel C. Madsen, various subpoenas served on the receiver, attorneys still in possession of receivership funds, and defendants' failures to turn over assets and strategy for resolving each; review correspondence record re: Madsen's failure to comply in connection with the same	0.70	238.00
04/11/23	Kara B. Hendricks	Telephone call with D. Clukey, G. Winkler and C. Fronk and discuss assets of C. Rohner and S. Johnson (.6); Discuss next steps with G. Winkler and request A. Deering assistance update asset chart (.3); Request B. Bigler's assistance in preparation of lis pendens for Rohner Gilbert AZ property (.1);	1.00	480.25
04/11/23	Kara B. Hendricks	Telephone call with G. Winkler, D. Zaro, J. Rickard and other to discuss subpoenas to Receiver and respond to email from counsel agreeing to accept service of same;	0.40	192.10
04/11/23	Kara B. Hendricks	Confer and strategize with K. Ewing and C. Spaulding regarding pending projects (subpoena responses, third party subpoenas, communication with counsel regarding turnover issues, motions to compel) and divisions of work;	0.50	240.13
04/11/23	Kara B. Hendricks	Research issues relating to Judd attorney payments and amounts received and follow-up with J. del Castillo regarding return of funds from A. Marshall, J. Sellers, J. Bell;	0.90	432.23
04/11/23	Kara B. Hendricks	Discuss Las Vegas meetings with G. Winkler; Correspond with A. Deering regarding upcoming investor meeting;	0.20	96.05
04/11/23	Kara B. Hendricks	Correspond with G. Winkler regarding motion to compel and follow-up with C. Spaulding regarding finalizing declaration	0.20	96.05
04/11/23	Kara B. Hendricks	Attention to emails from D. Zaro and K. Ewing regarding subpoena response strategy;	0.20	96.05
04/11/23	Kara B. Hendricks	Telephone call with G. Winkler and L. Jeffrey regarding assets and next steps;	0.50	240.13
04/11/23	Steph Morrill	Referencing C.Spaulding review notes, begin pulling document references to the motion for order to show cause, and finalize each as an exhibit;	1.50	262.50
04/11/23	Christian Spaulding	Review letters to C.Madsen and meeting	0.80	255.00

		with team regarding the same.		
04/11/23	Christian Spaulding	Communications with team regarding preparation of Motion for Order to Show Cause to be filed.	0.20	63.75
04/12/23	Kyle Ewing	Further review of motion for order to show cause/for turnover re: P. Beasley and A. Grigsby, including exhibits and appendices to the same; communication with S. Morrill re: the same	0.40	136.00
04/12/23	Kyle Ewing	Email communication with G. Winkler re: Eco Battery's failure to comply with the Receiver's demand letters	0.10	34.00
04/12/23	Kyle Ewing	Conference with K. Hendricks re: receivership funds still held in attorney trust accounts and the receiver's position with regard to fees purportedly earned and applied by attorneys prior to the asset freeze	0.20	68.00
04/12/23	Kara B. Hendricks	Follow-up regarding finalizing Grigsby motion and exhibits and respond to questions regarding same;	0.20	96.05
04/12/23	Kara B. Hendricks	Attention to emails regarding Jager assignment; Respond to G. Winkler email regarding Eco Battery demand;	0.20	96.05
04/12/23	Kara B. Hendricks	Work with S. Morrill to identify documents and information to be shared with larger group and develop plan paralegal transition plan (.5); Connect S. Morill and M. Barkhov to coordinate efforts with AFS (.1);	0.60	288.15
04/12/23	Kara B. Hendricks	Attention to email from L. Jeffrey with bank statements and email regarding investment balance sheet;	0.10	48.03
04/12/23	Kara B. Hendricks	Attention to emails form C. Fronk regarding Tanner discussion and appeal issues;	0.10	48.03
04/12/23	Kara B. Hendricks	Follow-up with A Deering regarding attorney retainer concerns and prepare detailed email outlining issues of concerns based on review of court orders and information received from counsel;	0.80	384.20
04/12/23	Steph Morrill	Draft K.Hendricks declaration in support of motion to show cause and circulate for approval;	1.40	245.00
04/12/23	Steph Morrill	Referencing C.Spaulding review notes, continue pulling document references to the motion for order to show cause, and finalize each as an exhibit;	4.00	700.00
04/12/23	Christian Spaulding	Confer with team regarding strategy for submitting documents with Motion for Order to Show Cause.	0.20	63.75
04/13/23	Kyle Ewing	Final review of motion for order to show cause (P. Beasley and A. Grigsby) and exhibit appendices in preparation for filing; confer with GT team re: the same	0.20	68.00
04/13/23	Kyle Ewing	Participate in weekly receivership team call to discuss various asset marshaling and	0.90	306.00

		forensic accounting issues, including ongoing efforts to secure assets from defendants, their attorneys, and others; appeal of motion to intervene opposed by receiver, defendants and others' efforts to obtain discovery from the receiver and other items		
04/13/23	Kyle Ewing	Telephonic conference with K. Hendricks, G. Winkler, and J. Hall re: results of today's interview of M. Beasley and next steps re: discovery based on new information; follow-up with K. Hendricks re: the same	0.60	204.00
04/13/23	Kyle Ewing	Research law and review appointment order in connection with determining Receiver's available discovery mechanisms for investigating whether newly discovered P. Beasley storage units house receivership assets and other concerns related to receivership property still in possession/custody of Beasleys; confer with K. Hendricks and email communication with G. Winkler re: the same	0.20	68.00
04/13/23	Kara B. Hendricks	Participate in call with team to discuss pending matters including communication with defendants, asset turnover, accounting issues, additional follow-up needed, etc. (participants include G. Winkler, A. Deering, J. del Castillo, K. Ewing);	1.10	528.28
04/13/23	Kara B. Hendricks	Correspond with C. Spaulding regarding exhibit questions and finalizing Grigsby motion to compel (.3); Follow-up with G. Winkler regarding finalizing same and discussion regarding related issues and communications with Beasley (.4);	0.70	336.18
04/13/23	Kara B. Hendricks	Follow-up with I. Dvyver regarding subpoena; Correspond with C. Fronk regarding subpoenas;	0.30	144.08
04/13/23	Kara B. Hendricks	Follow-up with C. Jorgenson regarding transfer tax issues;	0.10	48.03
04/13/23	Kara B. Hendricks	Revise declaration in support of Grigsby motion to compel and review appendix and related exhibits;	0.60	288.15
04/13/23	Kara B. Hendricks	Call with T. Elson regarding J. Jenne assets and turnover issues and review and respond to follow-up emails;	0.50	240.13
04/13/23	Kara B. Hendricks	Follow-up with K. Ewing regarding phone carrier subpoena issues;	0.20	96.05
04/13/23	Steph Morrill	Review weekly meeting notes received from client A.Deering in order to gain understanding of movement, and actions taken, over course of matter;	0.60	105.00
04/13/23	Steph Morrill	Final revisions to motion to seal; Revise appendix volume 1 with updated K.Hendricks declaration in support of motion for order to show cause;	0.60	105.00

04/13/23	Steph Morrill	Draft appendix of exhibits to motion for order to show cause;	0.30	52.50
04/13/23	Steph Morrill	Finalize exhibit set, and prepare appendix volumes for filing; Revise exhibit set in consideration of the revisions to K.Hendricks declaration in support of the motion for order to show cause, expanding the exhibit set from 5 to 15;	3.30	577.50
04/13/23	Steph Morrill	Final pass review of motion for order to show cause against draft K.Hendricks declaration in support thereof, and advise C.Spaulding of additional brief references for inclusion in declaration; Annotate motion to include appendix pagination pin cites; Perform final review of motion to seal the appendix of exhibits;	0.80	140.00
04/13/23	Christian Spaulding	Finalize draft of Motion for Order to Show Cause Re: A. Grigsby and P. Beasley including drafting declaration of K. Hendricks, gathering exhibits and finalizing citations thereto.	2.90	924.37
04/13/23	Christian Spaulding	Confer with K. Hendricks regarding outcome of meeting between Client and Matthew Beasley.	0.20	63.75
04/14/23	Kyle Ewing	Begin drafting receiver's objections to R. Madsen's subpoena and requests for documents from the receiver	1.40	476.00
04/14/23	Kyle Ewing	Email communication with G. Winkler re: yesterday's filing of the receiver's motion for an order to show cause (Beasley and Grigsby) and posting of pleadings to the receivership website; follow up re: order granting motion to seal and review the order	0.40	136.00
04/14/23	Kyle Ewing	Review EcoBattery's response to the Receiver's demand letters; review underlying promissory notes in connection with analysis of the same and provide analysis to G. Winkler and K. Hendricks	1.10	374.00
04/14/23	Kyle Ewing	Email communication with G. Winkler re: popular local news sources (tv, radio, print)	0.20	68.00
04/14/23	Christian Spaulding	Emails with client regarding news outlets in Las Vegas of importance.	0.20	63.75
04/16/23	Kyle Ewing	Preliminary review of subpoena responses from various entities related to CapSource; review email analysis of K. Hendricks	0.20	68.00
04/16/23	Kara B. Hendricks	Attention to minute order regarding motion to seal and attention to emails from G. Winkler and K. Ewing regarding same;	0.10	48.03
04/16/23	Kara B. Hendricks	Attention to email from D. O'Toole regarding Madsen items and follow-up with A. Deering and B. Tranquillo regarding same; Provide additional information to D. O'toole and follow-up regarding house turnover;	0.40	192.10
04/16/23	Kara B. Hendricks	Request real estate team assistance with lis pendens on Syebert Montana property and	0.20	96.05

		respond to email from L. Maningo regarding same;		
04/16/23	Kara B. Hendricks	Review correspondence from counsel from Eco Battery regarding payment demand and correspond with G. Winkler and K. Ewing regarding focus of response and next steps;	0.40	192.10
04/16/23	Kara B. Hendricks	Attention to emails (x4) between K. deVyvever and K. Ewing regarding service of subpoena on Receiver and follow-up related to same;	0.20	96.05
04/16/23	Amy L. Hershberger	Assist with preparing Notice of Lis Pendens regarding property 3652 E. Robin Ln, Gilbert, AZ 85296-1849 for recording in Maricopa County.	0.40	70.00
04/17/23	Beth Bigler	Prepare notice of lis pendens for 3652 E. Robin Lane.	0.30	122.40
04/17/23	Kyle Ewing	Draft, review, and revise letter in response to April 14 letter from H. Hatfield, counsel for Eco Battery; email communication with K. Hendricks and G. Winkler re: the same	1.50	510.00
04/17/23	Kyle Ewing	High-level review of documents provided by Eco Battery/Eco Capital in connection with drafting Receiver's response to April 14 letter of H. Hatfield, counsel for Eco Battery	0.30	102.00
04/17/23	Kyle Ewing	Begin planning and preparing with K. Hendricks and G. Winkler for defending Winkler in his requested testimony during hearing in M. Beasley criminal proceeding re: his detention	0.20	68.00
04/17/23	Kyle Ewing	Continue drafting objections to R. Madsen's subpoena to the receiver; review and revise the same and provide to K. Hendricks for her review; conference with K. Hendricks re: the same	0.40	136.00
04/17/23	Kyle Ewing	Telephonic conference with C. Fronk, G. Winkler, and K. Hendricks re: discovery efforts by defendants; ongoing efforts to secure assets from defendants including C. Madsen; failure to cooperate from certain defendants, and forensic accounting efforts; follow up with K. Hendricks and G. Winkler	0.40	136.00
04/17/23	Kyle Ewing	Review notes of G. Winkler re: Beasley interview in connection with determining next steps based on information provided and in preparation for Winkler's requested appearance at Beasley detention hearing	0.30	102.00
04/17/23	Kyle Ewing	Telephonic conference with G. Winkler and K. Hendricks re: approach to Eco Battery demand letter response in preparation for drafting the same	0.30	102.00
04/17/23	Kara B. Hendricks	Confer with G. Winkler and K. Ewing regarding response to EcoBatt communication and next steps (.4); Follow-up with M. Pham regarding	0.60	288.15

		document production by both Eco entities (.2);		
04/17/23	Kara B. Hendricks	Review notes from G. Winkler meeting with M. Beasley(.3); Review access grant between G. Winkler and SEC and follow-up regarding initial communication (.1);	0.40	192.10
04/17/23	Kara B. Hendricks	Attention to email from J. Jongeward and provide account records to A. Deering for further review; Review email with links regarding Jongeward investments and request paralegal assistance with download and initial review;	0.20	96.05
04/17/23	Kara B. Hendricks	Discussion with C. Fronk, G. Winkler and K. Ewing regarding R. Madsen subpoena response (and prior review of same), SEC anticipated production and C. Madsen compliance concerns;	0.60	288.15
04/17/23	Kara B. Hendricks	Attention to email from G. Winkler regarding lien on Abby Hill property and prepare email to attorney J. Leach and follow-up via phone with request for payoff (.3); Forward initial response to A. Deering and request update on sale proceedings (.1);	0.40	192.10
04/18/23	Kyle Ewing	Review comments/edits of K. Hendricks to draft response letter to H. Hatfield; email communication with K. Hendricks and G. Winkler re: the same	0.20	68.00
04/18/23	Kyle Ewing	Finish drafting objections to R. Madsen subpoena and forward to K. Hendricks for her review; confer with Hendricks re: the same	4.00	1,360.00
04/18/23	Kyle Ewing	Conference with K. Hendricks re: results of C. Madsen meet and confer and next steps for filing motion to compel re: the same	0.10	34.00
04/18/23	Kyle Ewing	Continue preparing for defending hearing testimony of G. Winkler at Friday's detention hearing in the Beasley criminal matter, including review of affidavit of Winkler dated April 6, 2023, further review of notes of last week's interview of Beasley, and pleadings in criminal matter	0.90	306.00
04/18/23	Kara B. Hendricks	Respond to email from S. Morrill regarding Jongeward documents; Attention to email from D. O'Toole regarding R. Madsen matters and follow-up;	0.20	96.05
04/18/23	Kara B. Hendricks	Review correspondence from J. Piskel regarding purported claims against LaJines;	0.20	96.05
04/18/23	Kara B. Hendricks	Telephone call with J. Giradino, C. Fronk and G. Winkler and prepare confirming email based on discussion and review of documents(.8); Follow-up with C. Spaulding regarding motion to compel (.1);	0.90	432.23
04/18/23	Kara B. Hendricks	Revise Eco Battery letter and follow-up with G. Winkler and K. Ewing regarding same;	0.80	384.20
04/18/23	Christian Spaulding	Confer with K. Hendricks regarding status	0.20	63.75

04/19/23	Kyle Ewing	of dispute pertaining to C. Madsen. Further review and revise draft declaration of G. Winkler re: Beasley cooperation and Beasley asset dissipation	0.20	68.00
04/19/23	Kyle Ewing	Continue planning and preparing for representing receiver at Friday's Beasley detention hearing, including conference with K. Hendricks; finish reviewing relevant pleadings/notes and research law re: extent of receiver work product protection and participation in criminal proceedings as witness in connection with the same	1.80	612.00
04/19/23	Kyle Ewing	Telephonic communication with E. Schmale, counsel for the US, re: Friday's detention hearing and the Receiver's limited declarations; confer with K. Hendricks re: the same	0.30	102.00
04/19/23	Kyle Ewing	Email communication with G. Winkler re: scheduling preparation session for his potential testimony at Beasley's criminal hearing on Friday	0.10	34.00
04/19/23	Kyle Ewing	Review and revise objections to R. Madsen subpoena to address edits/comments of K. Hendricks; research law re: accountant-client privilege in connection with addressing comments; finalize the objections in preparation for service of the same	3.90	1,326.00
04/19/23	Kyle Ewing	Review information from M. Pham re: production of documents provided by banks in connection with revising receiver's objections to R. Madsen subpoena; follow up	0.30	102.00
04/19/23	Kara B. Hendricks	Revise objections to Madsen subpoena and confer with K. Ewing regarding same and scope of requests;	1.80	864.45
04/19/23	Kara B. Hendricks	Review emails regarding bank records and subpoena responses;	0.20	96.05
04/19/23	Kara B. Hendricks	Follow-up regarding information provided to counsel relating to Beasley and representations made at release hearing and revise draft declaration;	0.80	384.20
04/19/23	Kara B. Hendricks	Correspond with G. Winkler regarding Eco Battery payments and allocation of disputed funds;	0.10	48.03
04/20/23	Kyle Ewing	Continue preparing for potential appearance of receiver as witness during Beasley detention hearing, including conference with K. Hendricks and G. Winkler; review further case law re: receiver's role as witness	2.00	680.00
04/20/23	Kyle Ewing	Attend weekly team call with K. Hendricks, AFS (G. Winkler, J. Hall, and others) and AM (J. delCastillo and D. Zaro), including discussion of real property sales offers, bank turnover, outstanding	0.70	238.00

		attorney turnover, and other issues re: defendants' assets including Eco Battery negotiations, obtaining text messages, and other items		
04/20/23	Kyle Ewing	Continue preparing subpoenas to cell phone carriers of Defendants seeking text messages and call records; review information from AFS re: defendants' cell phones in connection with the same and begin researching law re: permissible scope of cell phone record subpoenas and confidentiality concerns to ensure document requests are properly tailored	0.50	170.00
04/20/23	Kara B. Hendricks	Follow-up with K. Dean to reissue check to make-up missing fees; Review correspondence with Allen Matkins regarding bank records; Follow-up regarding notarization in Utah office;	0.40	192.10
04/20/23	Kara B. Hendricks	Participate in call with G. Winkler, A. Priebe, J. delCastillo, D. Zaro and K. Ewing to review cases status and next including discussion regarding communication with defendants, asset turnover issues, investor leads, upcoming hearings and potential third party recovery;	0.70	336.18
04/20/23	Kara B. Hendricks	Confer with G. Winkler regarding upcoming hearing, expectations and research relating to same;	0.30	144.08
04/21/23	Kyle Ewing	Conference with K. Hendricks re: objections to subpoenas due next week, subpoenas to the cell phone companies, and issues re: C. Madsen's failure to comply with appointment order provisions requiring turnover of information and documents	0.30	102.00
04/21/23	Kyle Ewing	Research law re: subpoenas to cell phone carriers in connection with preparing subpoenas for relevant records of individual defendants	1.40	476.00
04/21/23	Kyle Ewing	Follow up re: rescheduling of hearing in Beasley's criminal proceeding	0.30	102.00
04/21/23	Kara B. Hendricks	Follow-up with K. Ewing regarding subpoena objections and service of same and discussions with defendants regarding turnover;	0.50	240.13
04/21/23	Kara B. Hendricks	Attention to matters involving signing of title documents from R. Madsen and email D. O'Toole and AFS and B. Tranquillo to coordinate efforts;	0.40	192.10
04/21/23	Kara B. Hendricks	Review correspondence from J. Giardino re C. Madsen and follow-up with G. Winkler regarding proposal;	0.20	96.05
04/22/23	Kyle Ewing	Email communication with E. Schmale re: call about Monday's hearing and receiver's declarations re: Beasley's cooperation	0.10	34.00
04/23/23	Kyle Ewing	Telephonic conference with E. Schmale re: tomorrow's hearing and receiver's	0.50	170.00

04/23/23	Kyle Ewing	attendance; review receiver's declarations in connection with the same Draft objections to Wells Fargo's subpoena to the Receiver; research law and review pleadings in ancillary litigation in connection with the same	1.70	578.00
04/24/23	Kyle Ewing	Email communication with M. Pham re: objections to C. Madsen's subpoena in connection with providing determining the scope of the materials subject to bank protective orders included in the subpoena	0.20	68.00
04/24/23	Kyle Ewing	Finish drafting and review/revise objections to Wells Fargo's subpoena to the Receiver; email communication with K. Hendricks re: the same	1.70	578.00
04/24/23	Kyle Ewing	Attend today's hearing in Beasley's criminal proceeding in light of declarations of receiver submitted by Beasley and the government in connection with the hearing; final review of declarations and final preparation with G. Winkler for the same	3.90	1,326.00
04/24/23	Kara B. Hendricks	Prepare litigation status report and correspond with A. Preibe regarding the same;	1.50	720.38
04/24/23	Kara B. Hendricks	Attention to email from D. O'Toole regarding Madsen signing of titles and follow-up with B. Tranquillo and E. Escobar-Gaddi;	0.30	144.08
04/24/23	Kara B. Hendricks	Follow-up with Allen Matkins regarding subpoena objections and request J. Rickard assistance in finalizing same;	0.30	144.08
04/25/23	Kyle Ewing	Review documents previously produced by Eco Captial/Eco Battery in connection with determining deficiencies under receiver's subpoena in conjunction with drafting K. Hendricks' response to latest correspondence from Eco Battery	0.20	68.00
04/25/23	Kyle Ewing	Email communication with J. Hall and K. Hendricks re: AFS's review of documents previously produced by Eco Captial/Eco Battery in connection with determining deficiencies under receiver's subpoena in conjunction with drafting K. Hendricks' response to latest correspondence from Eco Battery	0.20	68.00
04/25/23	Kara B. Hendricks	Correspond via email with J. Rickard regarding subpoena objection; Request C. Spaulding cover weekly Receivership team call;	0.10	48.03
04/25/23	Kara B. Hendricks	Work with SLC office regarding Madsen document issues and discuss needs with S. Williams (.3); Review information regarding value of Madsen Duck Creek property (.1); Email D. O'Toole regarding same (.2);	0.60	288.15
04/25/23	Kara B. Hendricks	Confer with K. Ewing regarding Beasley hearing, Eco Battery analysis, subpoenas	0.40	192.10

04/25/23	Kara B. Hendricks	and review of status report; Attention to email from G. Winkler regarding M. Murphy and follow-up regarding accounting information provided;	0.30	144.08
04/25/23	Kara B. Hendricks	Review email G. Winkler regarding Eco Battery and follow-up with K. Ewing regarding documents obtained and records demand;	0.20	95.80
04/25/23	Steph Morrill	Review Mark Murphy documentation, and opposition to SEC motion to amend preliminary injunction order, for any analysis regarding profits, and circulate to K.Hendricks;	1.40	245.00
04/25/23	Christian Spaulding	Confer with team regarding weekly meeting and updates pertinent to the same.	0.20	63.75
04/26/23	Kyle Ewing	Follow up with M. Pham re: notice to banks of subpoenas and the receiver's objections to the same	0.10	34.00
04/26/23	Kyle Ewing	Email communication re: subpoenas and objections to subpoenas and the receiver's positions	0.20	68.00
04/26/23	Kyle Ewing	Confer with K. Hendricks re: results of the status check hearing with the Court and discussions with co-counsel re: receiver's objections to various subpoenas	0.30	102.00
04/26/23	Kyle Ewing	Continue preparing subpoenas to cell phone carriers re: defendants text messages and call logs	1.60	544.00
04/26/23	Kara B. Hendricks	Attention to emails from M. Pham regarding subpoena objections; Follow-up regarding phone record subpoena issues;	0.20	96.05
04/26/23	Kara B. Hendricks	Review Murphy summary and follow-up with G. Winkler regarding M. Murphy assets and next steps;	0.30	144.08
04/26/23	Kara B. Hendricks	Attention to emails regarding R. Madsen assets including follow-up with S. Williams and B. Tranquillo and responding to D. O'Toole emails;	0.30	144.08
04/26/23	Kara B. Hendricks	Review docket and identify pending pleadings to discuss with court at hearing, attend hearing and debrief with G. Winkler regarding pending matters and next steps;	2.10	1,008.53
04/26/23	Kara B. Hendricks	Respond to J. Rickard inquiries regarding records received and meet and confer request and follow-up with K. Ewing regarding same;	0.50	240.13
04/27/23	Kyle Ewing	Further conferral re: receiver's objections to various subpoenas regarding undue burden imposed by improper shifting of discovery costs to receiver; follow-up with J. Rickard	0.80	272.00
04/27/23	Kyle Ewing	Review subpoena document requests to cell phone carriers to address comments/edits of K. Hendricks; confer with K. Hendricks re: the same; communication with J. Rickard re: the same	0.50	170.00
04/27/23	Kyle Ewing	Review letter from J. Piskel re: alleged Carver claims against Lajiness; confer with	0.20	68.00

04/27/23	Kyle Ewing	K. Hendricks re: the same Preliminary review of P. Beasley/Grigsby opposition to receiver's renewed motion for an order to show cause and/or turnover order in connection with forming strategy for responding to the same	1.10	374.00
04/27/23	Kyle Ewing	Email communication with G. Winkler, C. Spaulding, and K. Hendricks re: P. Beasley/Grigsby opposition to receiver's motion for an order to show cause and/or for turnover of assets	0.20	68.00
04/27/23	Kyle Ewing	Begin reviewing Eco Battery and Eco Capital document analysis from G. Winkler in preparation for drafting letters to Eco Battery and Eco Capital demanding further books and records	0.20	68.00
04/27/23	Kara B. Hendricks	Attention to emails regrading Eco Battery payments from G. Winkler, and emails from M. Barkhanoy regarding document review; Follow-up with K. Ewing regarding book and records demand, subpoena follow-up and Jager interest;	0.30	144.08
04/27/23	Kara B. Hendricks	Respond to email from K. Carter regarding La Jiness claims;	0.30	144.08
04/27/23	Kara B. Hendricks	Participate in team call with G. Winkler, J.McGraw, A. Priebe, C. Spaulding, and Allen Matkins team to discuss forensic account status, discussions with defendants and turnover efforts, third party subpoenas and recovery efforts, anticipated filings;	0.50	240.13
04/27/23	Kara B. Hendricks	Review and revise draft subpoena for phone records and discuss pending concerns with K. Ewing;	0.60	288.15
04/27/23	Kara B. Hendricks	Follow-up with real estate team regarding encumbering Seybert property in Montana and provide additional information for preparation of deed of trust;	0.40	192.10
04/27/23	Kara B. Hendricks	Initial review of Grigsby response to motion to compel and correspond with G. Winkler regarding same;	0.20	96.05
04/27/23	Kara B. Hendricks	Provide C. Spaulding background to share with AFS on upcoming call regarding asset recovery efforts and communications with defendants;	0.30	144.08
04/27/23	Steph Morrill	Research registered agents through NV Secretary of State and draft subpoenas duces tecums to Verizon, AT&T, and T-Mobile; Circulate drafts to K.Hendricks and K.Ewing for consideration;	1.70	297.50
04/27/23	Christian Spaulding	Review weekly meeting notes and confer with K. Hendricks regarding updates to be provided to team.	0.50	159.37
04/27/23	Christian Spaulding	Confer with K. Hendricks and participate in weekly update meeting with team.	0.60	191.25
04/28/23	Kyle Ewing	Review, revise, and finalize subpoenas to AT&T and T-Mobile and email communication with GT team re: the same	1.10	374.00

04/28/23	Kyle Ewing	(0.9); email communication with J. Rickard re: Verizon subpoena (0.2) Further review of opposition to receiver's motion for turnover/order to show cause re: P. Beasley/Grigsby; confer with G. Winkler re: the same and outline receiver's arguments in reply with C. Spaulding	0.90	306.00
04/28/23	Kara B. Hendricks	Review emails regarding outgoing subpoenas and related follow-up;	0.30	144.08
04/28/23	Steph Morrill	Draft exhibit 2 to subpoena duces tecums to Verizon, AT&T, and T-Mobile; Prepare Verizon packet pieces for K.Ewing review;	0.40	70.00
04/28/23	Steph Morrill	In order to properly notice all represented and pro se defendants, review Pacer party list against service lists(2.1); Meet with K.Ewing to discuss certain pro se defendants without readily available contact information(.3); Draft Notice of Subpoenas Duces Tecum(1.0); Having received updated contact information for certain Pro Se defendants, revise service list in draft notice of subpoenas(.3); Draft cover service email to all counsel (including pro se defendant contact emails) for service of the notice, but withhold sending as conflict clearance still pending(.4);	4.10	717.50
04/28/23	Christian Spaulding	Confer with K. Ewing regarding A. Grigsby response to Motion for Order to Show Cause and strategy in response.	0.30	95.68

Total Hours: 162.60

Total Amount: \$ 57,272.49

TIMEKEEPER SUMMARY FOR TASK CODE GW001,

ASSET ANALYSIS AND RECOVERY

Summary of Fees (Standard Rates)

<u>Timekeeper Name</u>	<u>Hours Billed</u>	<u>Standard Rate</u>	<u>Total \$ Amount</u>
Kara B. Hendricks	48.40	610.00	29,524.00
Beth Bigler	0.30	480.00	144.00
Kyle Ewing	58.90	450.00	26,505.00
Christian Spaulding	29.60	395.00	11,692.00
Amy L. Hershberger	0.40	340.00	136.00
Steph Morrill	23.70	295.00	6,991.50
Cynthia L. Ney	1.30	295.00	383.50
Totals:	162.60	463.57	\$ 75,376.00

Summary of Fees (Discounted Rates)

<u>Timekeeper Name</u>	<u>Hours Billed</u>	<u>Average Discounted Rate</u>	<u>Total \$ Amount</u>
Kara B. Hendricks	48.40	480.25	23,244.08
Beth Bigler	0.30	408.00	122.40
Kyle Ewing	58.90	340.00	20,026.00
Christian Spaulding	29.60	318.75	9,435.01
Amy L. Hershberger	0.40	175.00	70.00
Steph Morrill	23.70	175.00	4,147.50
Cynthia L. Ney	1.30	175.00	227.50
Totals:	162.60	352.23	\$ 57,272.49

TASK CODE: GW003 BUSINESS OPERATIONS

<u>DATE</u>	<u>TIMEKEEPER</u>	<u>DESCRIPTION</u>	<u>HOURS</u>	<u>AMOUNT</u>
04/10/23	Jennifer Rohrbach	Reviewed Nevada Secretary of State rejection notices regarding Certificate of Amendment and Registered Agent Acceptance filings. Rejections received by C. Ney. Provided information to K. Hendricks.	0.40	70.00
			Total Hours:	0.40
			Total Amount:	\$ 70.00

TIMEKEEPER SUMMARY FOR TASK CODE GW003,

BUSINESS OPERATIONS

Summary of Fees (Standard Rates)

<u>Timekeeper Name</u>	<u>Hours Billed</u>	<u>Standard Rate</u>	<u>Total \$ Amount</u>
Jennifer Rohrbach	0.40	285.00	114.00
Totals:	0.40	285.00	\$ 114.00

Summary of Fees (Discounted Rates)

<u>Timekeeper Name</u>	<u>Hours Billed</u>	<u>Average Discounted Rate</u>	<u>Total \$ Amount</u>
Jennifer Rohrbach	0.40	175.00	70.00
Totals:	0.40	175.00	\$ 70.00

TASK CODE: GW004 CASE ADMINISTRATION

<u>DATE</u>	<u>TIMEKEEPER</u>	<u>DESCRIPTION</u>	<u>HOURS</u>	<u>AMOUNT</u>
04/04/23	LAC GROUP LAC GROUP	Conduct research to obtain the docket and filing #13 in the case Nolan v. Jeffery; utilizing Orange County Superior (CA) Court; for C. Ney.	0.50	116.88
04/10/23	Kara B. Hendricks	Review information from Ninth Circuit regarding appeal relating to motion to intervene and correspond with J. del Castillo regarding same.	0.10	48.03
04/12/23	Steph Morrill	Meet with K.Hendricks to discuss matter status and to receive task assignments;	0.30	52.50
04/14/23	Steph Morrill	Conference with M.Barkhanoy to discuss Box upload best practices and record organization; Draft and send follow up email correspondence to K.Hendricks summarizing telephone call with M.Barkhanoy;	0.80	140.00
04/18/23	Kara B. Hendricks	Participate in call with representatives of Aitheras, G. Winkler, and D. Zaro to discuss document sharing, storage and access and follow-up with L. Milstein with GT users;	0.50	240.13
04/21/23	Suzanne Williams	Communications with Evy Escobar-Gaddi re scheduling of notary in Salt Lake to accommodate signing by Mr. Madsen.	0.20	35.00
04/24/23	Suzanne Williams	Emails from / to Evy Escobar-Gaddi re arrangements to meet with Mr. Madsen for notary on Tuesday, April 25th.	0.20	35.00
04/25/23	Suzanne Williams	Emails and telephone calls with Evy re receipt of docs to be provided via UPS and scheduling of notary; telephone conference with Kara Hendricks.	0.40	70.00
04/26/23	Suzanne Williams	Continued monitoring of correspondence re scheduling of notary; receipt of package from UPS and review contents; email copy of contents to K. Hendricks and Evy Escobar-Gaddi.	0.30	52.50
04/27/23	Suzanne Williams	Prepare for travel and meeting with Mr. Madsen for notarized signing of titles; travel to destination to meet Mr. Madsen; notarization of Nevada titles.	1.00	175.00
04/28/23	Suzanne Williams	Prepare notarized documents for mailing to K. Hendricks.	0.60	105.00
Total Hours:			4.90	
Total Amount:				\$ 1,070.04

TIMEKEEPER SUMMARY FOR TASK CODE GW004,

CASE ADMINISTRATION

Summary of Fees (Standard Rates)

<u>Timekeeper Name</u>	<u>Hours Billed</u>	<u>Standard Rate</u>	<u>Total \$ Amount</u>
Kara B. Hendricks	0.60	610.00	366.00
Steph Morrill	1.10	295.00	324.50
Suzanne Williams	2.70	300.00	810.00
LAC GROUP LAC GROUP	0.50	275.00	137.50
Totals:	4.90	334.29	\$ 1,638.00

Summary of Fees (Discounted Rates)

<u>Timekeeper Name</u>	<u>Hours Billed</u>	<u>Average Discounted Rate</u>	<u>Total \$ Amount</u>
Kara B. Hendricks	0.60	480.27	288.16
Steph Morrill	1.10	175.00	192.50
Suzanne Williams	2.70	175.00	472.50
LAC GROUP LAC GROUP	0.50	233.76	116.88
Totals:	4.90	218.38	\$ 1,070.04

TASK CODE: GW005 CLAIMS ADMINISTRATION AND OBJECTIONS

<u>DATE</u>	<u>TIMEKEEPER</u>	<u>DESCRIPTION</u>	<u>HOURS</u>	<u>AMOUNT</u>
04/10/23	Kara B. Hendricks	Attention to email from A. Priebe and revise/update investor update for April;	0.30	144.08
04/10/23	Kara B. Hendricks	Review and revise motion to seal and document produced by Grigsby and correspond with C. Spaulding regarding same;	0.30	144.08
Total Hours:			0.60	
Total Amount:				\$ 288.16

TIMEKEEPER SUMMARY FOR TASK CODE GW005,

CLAIMS ADMINISTRATION AND OBJECTIONS

Summary of Fees (Standard Rates)

<u>Timekeeper Name</u>	<u>Hours Billed</u>	<u>Standard Rate</u>	<u>Total \$ Amount</u>
Kara B. Hendricks	0.60	610.00	366.00
Totals:	0.60	610.00	\$ 366.00

Summary of Fees (Discounted Rates)

<u>Timekeeper Name</u>	<u>Hours Billed</u>	<u>Average Discounted Rate</u>	<u>Total \$ Amount</u>
Kara B. Hendricks	0.60	480.27	288.16
Totals:	0.60	480.27	\$ 288.16

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

<u>Timekeeper</u>	<u>Hours</u>	<u>Rate</u>	<u>Amount</u>
Kara B. Hendricks	49.60	565.00	28,024.00
Beth Bigler	0.30	480.00	144.00
Kyle Ewing	58.90	400.00	23,560.00
Christian Spaulding	29.60	375.00	11,100.00
Amy L. Hershberger	0.40	340.00	136.00
Steph Morrill	24.80	295.00	7,316.00
Cynthia L. Ney	1.30	295.00	383.50
Jennifer Rohrbach	0.40	285.00	114.00
Suzanne Williams	2.70	300.00	810.00
LAC GROUP LAC GROUP	0.50	275.00	137.50
Totals:	168.50		\$ 71,725.00

Summary of Fees (Discounted Rates)

<u>Timekeeper</u>	<u>Hours</u>	<u>Rate</u>	<u>Amount</u>
Kara B. Hendricks	49.60	480.25	23,820.40
Beth Bigler	0.30	408.00	122.40
Kyle Ewing	58.90	340.00	20,026.00
Christian Spaulding	29.60	318.75	9,435.01
Amy L. Hershberger	0.40	175.00	70.00
Steph Morrill	24.80	175.00	4,340.00
Cynthia L. Ney	1.30	175.00	227.50
Jennifer Rohrbach	0.40	175.00	70.00
Suzanne Williams	2.70	175.00	472.50
LAC GROUP LAC GROUP	0.50	233.76	116.88
Totals:	168.50		\$ 58,700.69

Invoice No.: 1000395478
 Re: SEC v. Beasley (Geoff Winkler, Receiver)
 Matter No.: 209375.010100

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Description of Expenses Billed:

<u>DATE</u>	<u>DESCRIPTION</u>		<u>AMOUNT</u>
03/23/23	VENDOR: Nationwide Legal, LLC (4527) - ACH INVOICE#: 00000055350 DATE: 3/31/2023 STANDARD PROCESS (48 to 72 HRS) - , 10701 Moon Flower Arbor Pl, Las Vegas NV on 3/23/23 Req'd by/for Ney, Cynthia L.	\$	65.00
03/28/23	VENDOR: Hendricks, Kara B. INVOICE#: 1665 DATE: 3/28/2023	\$	26.43
03/28/23	VENDOR: Hendricks, Kara B. INVOICE#: 1665 DATE: 3/28/2023	\$	534.96
03/29/23	VENDOR: Hendricks, Kara B. INVOICE#: 1665 DATE: 3/28/2023	\$	565.60
03/29/23	VENDOR: Hendricks, Kara B. INVOICE#: 1665 DATE: 3/28/2023	\$	19.96
		Total Expenses:	\$ 1,211.95



Invoice No. : 1000400792
File No. : 209375.010100
Bill Date : August 24, 2023

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

Attn: Geoff Winkler

INVOICE

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

Legal Services through July 31, 2023:

Total Fees: \$ 21,735.95

Expenses:

Filing Fees 650.00

Total Expenses: \$ 650.00

Current Invoice: \$ 22,385.95

Previous Balance (see attached statement): \$ 236,854.84

Total Amount Due: \$ 259,240.79

KBH:LC
Tax ID: 13-3613083



Invoice No.: 1000400792
File No. : 209375.010100

REMITTANCE ADVICE

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

CLIENT NAME: WINKLER, GEOFF
FILE NUMBER: 209375.010100
INVOICE NUMBER: 1000400792*
BILLING PROFESSIONAL: Kara B. Hendricks

Current Invoice:	\$	22,385.95
Previous Balance:	\$	236,854.84
Total Amount Due:	\$	259,240.79

FOR YOUR CONVENIENCE, WIRE TRANSFER FUNDS TO:

For Wire Instructions:

Bank: WELLS FARGO BANK
ABA #: 121000248

For ACH Instructions:

Bank: WELLS FARGO BANK
ABA#: 063107513

CREDIT TO: GREENBERG TRAUIG DEPOSITORY ACCOUNT
ACCOUNT #: 2000014648663

PLEASE

REFERENCE: **CLIENT NAME:** WINKLER, GEOFF
FILE NUMBER: 209375.010100
INVOICE NUMBER: 1000400792*
BILLING
PROFESSIONAL: Kara B. Hendricks

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

Greenberg Traurig
PO Box 936769
ATLANTA GA 31193-6769

Wire fees may be assessed by your bank.

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

KBH:LC

Tax ID: 13-3613083



Invoice No. : 1000400792
File No. : 209375.010100

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

KBH:LC

Tax ID: 13-3613083



Invoice No. : 1000400792
 File No. : 209375.010100

Account Statement

<u>Date</u>	<u>Invoice #</u>	<u>Fees Due</u>	<u>Expenses Due</u>	<u>Other Due</u>	<u>Total Due</u>
07/19/22	1000035547	16,627.52	0.00	0.00	16,627.52
10/03/22	1000096060	12,029.69	0.00	0.00	12,029.69
11/09/22	1000142381	16,674.86	0.00	0.00	16,674.86
11/09/22	1000142507	8,666.16	0.00	0.00	8,666.16
02/14/23	1000224348	14,644.91	0.00	0.00	14,644.91
02/14/23	1000224438	12,682.94	0.00	0.00	12,682.94
02/14/23	1000224498	11,834.06	0.00	0.00	11,834.06
05/15/23	1000315147	6,912.96	0.00	0.00	6,912.96
05/15/23	1000315185	7,047.65	0.00	0.00	7,047.65
06/09/23	1000340006	37,923.86	376.33	0.00	38,300.19
08/14/23	1000395478	58,700.69	1,211.95	0.00	59,912.64
08/14/23	1000395520	31,493.26	28.00	0.00	31,521.26
	Totals:	\$ 235,238.56	\$ 1,616.28	\$ 0.00	\$ 236,854.84

KBH:LC

Tax ID: 13-3613083

Description of Professional Services Rendered:

TASK CODE: GW001 ASSET ANALYSIS AND RECOVERY

<u>DATE</u>	<u>TIMEKEEPER</u>	<u>DESCRIPTION</u>	<u>HOURS</u>	<u>AMOUNT</u>
07/03/23	Kara B. Hendricks	Attention to email from K. Chippoletti regarding Humphries Flavocure assignment and correspond with G. Winkler regarding same;	0.10	48.03
07/03/23	Kara B. Hendricks	Correspond with C. Fronk regarding stipulation to sale Jager properties;	0.10	48.03
07/03/23	Kara B. Hendricks	Follow-up with R. Santos regarding subpoena analysis;	0.10	48.03
07/05/23	Kara B. Hendricks	Review minute order from Judge Silva regarding hearing and follow-up with team regarding status report requested and hearing coverage;	0.10	48.03
07/05/23	Kara B. Hendricks	Attention to emails regarding L. Jeffery accounts (from G. Winkler and L. Jeffery) and review email with documents from J. Humphries;	0.10	48.03
07/06/23	Kara B. Hendricks	Attention to emails from J. Giardino regarding sale of Madsen property and agreement with minority members and correspond with G. Winkler regarding same;	0.20	96.05
07/06/23	Kara B. Hendricks	Participate in call with G. Winkler, J. Hall, A. Priebe, M, Pham regarding status of forensic accounting, asset recovery efforts, communication with counsel, etc. (.3); Attention to emails and confer with G. Winkler regarding third party litigation claims (.1);	0.40	192.10
07/06/23	Kara B. Hendricks	Attention to emails from L. Palazzo and provide requested documents to finalize stipulation for sale of Rockstream and Sky Arc properties;	0.20	96.05
07/06/23	Steph Morrill	Update Winkler pleadings and discovery chart in preparation of, and engage in, weekly team meeting and matter status check, with K.Hendricks and C.Spaulding;	0.20	35.00
07/06/23	Christian Spaulding	Evaluate correspondence from counsel for Chris Humphries and attached assignment.	0.20	63.75
07/06/23	Christian Spaulding	Confer with K. Hendricks and S. Morrill regarding upcoming deadlines, hearings, and movement in case.	0.30	95.63
07/07/23	Kyle Ewing	Email communication with K. Hendricks and C. Spaulding re: presenting argument on Madsen contempt motions and related issues;	0.10	34.00
07/07/23	Kara B. Hendricks	Attention to emails form L. Palazzo regarding Jager and follow-up with G.	0.20	96.05

07/07/23	Kara B. Hendricks	Winkler regarding calculations requested; Correspond with K. Ewing regarding C. Madsen matters and upcoming hearing regarding motion to compel;	0.10	48.03
07/07/23	Kara B. Hendricks	Attention to emails from J. McGraw regarding stipulations to sale of SkyArc and Rockstream properties (Jager) and work with E. Escobar-Gaddi to finalize same;	0.30	144.08
07/07/23	Kara B. Hendricks	Review draft motion regarding handling of subpoenas and discovery matters and correspond with J. delCastillo regarding process (.3); Review discovery from SEC and follow-up with G. Winkler regarding same (.2);	0.50	240.13
07/07/23	Kara B. Hendricks	Respond to email from L. Maningo and follow-up regarding additional information needed to facilitate release requested by D. Seybert; Follow-up with G. Winkler regarding same;	0.30	144.08
07/10/23	Kyle Ewing	Confer with K. Hendricks re: status of discussions with C. Madsen over his efforts to cure his contempts of the receivership order;	0.20	68.00
07/10/23	Kara B. Hendricks	Correspond with A. Preibe regarding funds provided by Wells Fargo and follow-up with G. Winkler and J. delCastillo regarding same;	0.20	96.05
07/10/23	Kara B. Hendricks	Follow-up with R. Santos regarding subpoena analysis;	0.10	48.03
07/10/23	Kara B. Hendricks	Attention to information regarding R. Madsen Duck Creek property and follow-up with J. McGraw to evaluate address discrepancy;	0.20	96.05
07/10/23	Kara B. Hendricks	Follow-up with W. Welch-Kirmse regarding R. Madsen lis pendens;	0.10	48.03
07/10/23	Whitney Welch-Kirmse	Research Madsen's Duck Creek, UT property for ownership records and analyze issues to file lis pendens.	0.80	340.00
07/11/23	Kara B. Hendricks	Review Madsen response to SEC discovery motion and discuss with G. Winkler (.4); Email C. Fronk regarding R. Madsen response and discovery requests (.1);	0.50	240.13
07/11/23	Kara B. Hendricks	Correspond with G. Winkler and D. Huish regarding Tanner;	0.10	48.03
07/11/23	Kara B. Hendricks	Attention to emails regarding Duck Creek property issues (R. Madsen);	0.10	48.03
07/12/23	Kara B. Hendricks	Attention to emails regarding Montana lis pendens and confer with W. Welch-Kirmse regarding recording of same;	0.10	48.03
07/12/23	Kara B. Hendricks	Attention to email from G. Winkler regarding sale of Grand Desert and send follow-up emails requesting additional information to J. Giardino, L. Palazo and G. Mullins;	0.20	96.05
07/12/23	Kara B. Hendricks	Attend creditor meeting and correspond with AFS team regarding questions raised	1.00	480.25

		therein;		
07/12/23	Kara B. Hendricks	Follow-up with J. McGraw regarding lis pendens questions and status of properties list for sale;	0.20	95.80
07/13/23	Kara B. Hendricks	Attention to emails from title regarding Seybert Montana property and follow-up with J. McGraw regarding same (.1); Correspond with L. Maningo regarding Seybert accounts (.1);	0.20	96.05
07/13/23	Kara B. Hendricks	Participate in call with G. Winkler, D. Zaro; A. Preibe, J. Hall, and M. Bakhanoy regarding forensic accounting status, communication with defendants, asset recovery efforts, and anticipated court filings;	0.30	144.08
07/13/23	Kara B. Hendricks	Attention to email from L. Jefferys regarding accounts and new address;	0.10	48.03
07/13/23	Kara B. Hendricks	Participate in call with C. Fronk, G. Winkler, D. Baddley regarding case issues including communication with Seybert, C. Madsen, propounded discovery and response to R. Madsen motion;	0.60	288.15
07/13/23	Kara B. Hendricks	Review information from J. Giardino regarding Grand Desert sale (.1); Review information from G. Winkler relating to sale and LLC membership issues and provide feedback and suggested next steps relating to same (.4);	0.50	240.13
07/13/23	Kara B. Hendricks	Prepare declaration to support SEC reply regarding motion to continue discovery and clarify record regarding Receiver actions (1.1); Correspond with G. Winkler regarding same (.1);	1.20	576.30
07/13/23	Kara B. Hendricks	Correspond with G. Winkler regarding pending Grigsby P. Beasley issues and provide requested documents;	0.30	144.08
07/13/23	Christian Spaulding	Communications with K. Hendricks and G. Winkler regarding documents produced by A. Grigsby and locate said documents and work with team to transfer to G. Winkler.	0.70	223.13
07/13/23	Whitney Welch-Kirmse	Correspondence with MT title officer re recording Seybert Lis Pendens.	0.40	170.00
07/14/23	Kara B. Hendricks	Discuss Grand Desert sale concerns with K. Ewing;	0.10	48.03
07/14/23	Kara B. Hendricks	Follow-up with G. Winkler on declaration regarding R. Madsen issues, incorporate proposed changes and forward to C. Fronk for review;	0.40	192.10
07/14/23	Christian Spaulding	Communications with team regarding draft of stipulation to sell real property.	0.20	63.75
07/16/23	Kara B. Hendricks	Correspond with G. Winker regarding Ecobattery and LDS church payments;	0.10	48.03
07/16/23	Kara B. Hendricks	Prepare stipulation for sale of Canis Minor (Rosegreen property) and follow-up with J. McGraw regarding same;	0.60	288.15
07/17/23	Kara B. Hendricks	Attention to email from C. Fronk and follow-up with E. Esobar-Gaddi to	0.20	96.05

07/17/23	Kara B. Hendricks	finalize declaration of G. Winkler; Review draft letters and information regarding phone subpoenas from R. Santos and cross reference revised phone lists with contact sheet of phone call received from third parties;	0.40	192.10
07/17/23	Kara B. Hendricks	Review reply in support of motion to extend discovery deadlines filed by SEC;	0.10	48.03
07/17/23	Kara B. Hendricks	Review information provided by J. del Castillo and prepare litigation status to be included in quarterly report and correspond with A. Preibe regarding same;	0.70	336.18
07/18/23	Kara B. Hendricks	Update G. Winkler regarding phone subpoena plan (.2); Respond to emails from J. Kellogg regarding subpoena question (.1);	0.30	144.08
07/18/23	Kara B. Hendricks	Call with G. Winkler and discuss pending matters including GDBH sale, Eco Battery concerns, C. Madsen communication, obtaining records from US Attorney office;	0.60	288.15
07/19/23	Kara B. Hendricks	Review C. Madsen communication and discuss spreadsheet provided with G. Winkler (.4); Request C. Spaulding review documents provided and prepare letter to counsel addressing outstanding issues (.1);	0.50	240.13
07/19/23	Kara B. Hendricks	Review correspondence from J. Giardino regarding GDBH sale (x3) and correspond with G. Winkler regarding same (.3); Prepare email to J. Giardino to discuss funds being wired to the receiver and pending motion (.3);	0.60	288.15
07/19/23	Kara B. Hendricks	Attention to email regarding recorded lis pendens on Seybert Montana property and follow-up with J. McGraw regarding lis pendens matters in Utah involving R. Madsen and Judd (.2); Review updated information from title regarding Duck Creek property (.1);	0.30	144.08
07/19/23	Kara B. Hendricks	Correspond with D. O'Toole regarding R. Madsen subpoena;	0.10	48.03
07/19/23	Kara B. Hendricks	Review Eco Battery information including prior correspondence and draft letter to counsel regarding amounts remaining and missing documents and follow-up with G. Winkler regarding interest calculations	1.10	528.28
07/19/23	Kara B. Hendricks	Telephone call with J. Kellogg regarding status of records request from US attorneys and phone subpoenas;	0.20	96.05
07/19/23	Christian Spaulding	Evaluate documents produced to date by C. Madsen and prepare chart of the same.	2.90	924.38
07/20/23	Kara B. Hendricks	Attention to emails from J. Giardino and G. Winkler regarding C. Madsen documents and sale of GDBH including providing funds to Receiver (.2); Follow-up emails regarding missing documents (.2);	0.40	192.10
07/20/23	Kara B. Hendricks	Review emails and information from J. McGraw regarding amounts due from Eco	0.40	192.10

		Battery and update letter to counsel requesting same;		
07/20/23	Kara B. Hendricks	Call with J. Kellogg regarding investor list;	0.10	48.03
07/20/23	Kara B. Hendricks	Conference with K. Pscion regarding asset information in KCC database and accessing same;	0.70	336.18
07/20/23	Kara B. Hendricks	Participate in call with J. Winkler, A. Preibe, D. Zaro, J. Hall regarding status of forensic accounting, communication with defendants, asset discovery issues and pending matters;	0.30	144.08
07/20/23	Steph Morrill	Continue effort to identify Date Received and Received From information for records which remain unorganized within Box, and simultaneously, update the GT received records and Box document index;	0.60	105.00
07/20/23	Steph Morrill	Prepare GT received records and Box document index, at current stage, for circulation to Milana Barkhanoy, and Grace Radke of AFS, and K.Hendricks;	0.50	87.50
07/20/23	Christian Spaulding	Continue analysis of documents produced by C. Madsen and preparation of summary of the same.	4.50	1,434.38
07/21/23	Kara B. Hendricks	Work with E. Esobar-Gaddi to finalize Ecobattery letter;	0.10	48.03
07/21/23	Kara B. Hendricks	Attention to emails from J. Giardino and request C. Spaulding review new bank records for C. Madsen that were provided (.2); Discuss records and pending motion with G. Winkler (.2);	0.40	192.10
07/21/23	Steph Morrill	Evaluate incoming tax records from John Giardino, counsel for Chris Madsen, and circulate same to K.Hendricks and C.Spaulding for consideration (.3); Provide additional upload link through GT Liquid Files share file system to Emily Carlino of Pryor Cashman for upload of ACAC tax return documents (.1); Evaluate ACAC tax records from Emily Carlino and circulate same to K.Hendricks and C.Spaulding for consideration (.2);	0.60	105.00
07/21/23	Christian Spaulding	Review additional documents provided pertaining to C. Madsen and update summary chart regarding the same.	0.90	286.88
07/21/23	Christian Spaulding	Review tax returns for Chris and Andrea Madsen and update summary chart regarding the same.	0.40	127.50
07/21/23	Christian Spaulding	Evaluate additional documents provided by counsel for C. Madsen regarding sale of property at issue and loans between ACAC and Dirt Money.	0.30	95.63
07/23/23	Kara B. Hendricks	Review prior compiled information regarding phone subpoenas and prepare letters to AT&T, T-Mobile and Verizon and correspondence to opposing counsel that objected to subpoenas to address issues raised;	2.10	1,008.53

07/24/23	Kyle Ewing	Conference with K. Hendricks re: various receivership tasks including the sale of certain real properties, the results of call with C. Giardino (counsel for C. Madsen) re: Madsen's efforts to provide sufficient funds or security to avoid enforcement of full asset turnover and latest machinations with respect to sale of Grand Desert Behavioral facility and ongoing disputes with EcoBattery/EcoCapital and interim loan payments received;	0.30	102.00
07/24/23	Kara B. Hendricks	Call with G. Winkler, C. Fronk and J. Giardino regarding C. Madsen motion and request assistance with preparation of stipulation to continue hearing;	0.30	144.08
07/24/23	Kara B. Hendricks	Telephone call with D. O'Toole regarding R. Madsen subpoena and limiting scope (.4); Follow-up call with G. Winkler to discuss items raised by D. O'Toole (.2);	0.60	288.15
07/24/23	Kara B. Hendricks	Correspond with J. Kellogg regarding communication with the SEC regarding investor list production;	0.10	48.03
07/24/23	Kara B. Hendricks	Correspond with J. McGraw regarding finalizing sale of Rosegreen property and follow-up with L. Maningo regarding same;	0.20	96.05
07/24/23	Kara B. Hendricks	Discuss required subpoena follow-up with A. Levin and assistance with finalizing and filing status report;	0.30	144.08
07/24/23	Steph Morrill	Evaluate draft subpoena related letters addressed to mobile providers, AT&T and Verizon, and search for and confirm contact details;	0.40	70.00
07/24/23	Christian Spaulding	Evaluate response to objections pertaining to subpoena of phone records.	0.20	63.75
07/24/23	Christian Spaulding	Confer with K. Hendricks and A. Levin regarding upcoming deadlines and filings.	0.20	63.75
07/25/23	Kara B. Hendricks	Attention to emails from M. Cook and G. Winkler regarding M. Murphy RV concerns and related follow-up;	0.20	96.05
07/25/23	Kara B. Hendricks	Review emails regarding status of Seybert and prepare detailed response to L. Seybert and provide additional information regarding anticipated closing (.4); Respond to J. McGraw inquiry regarding information needed to close transaction (.1);	0.50	240.13
07/25/23	Kara B. Hendricks	Review letter from M. Cook and correspond with G. Winkler regarding issues raised regarding RV (.2); Respond to emails from M. Cook to address issues raised (.1)	0.30	144.08
07/25/23	Kara B. Hendricks	Attention to emails from J. Kellogg regarding pending document requests;	0.10	48.03
07/25/23	Steph Morrill	Update pleadings and discovery chart in preparation of, and engage in, weekly team meeting and matter status check, with	0.20	35.00

07/25/23	Christian Spaulding	K.Hendricks and C.Spaulding; Confer with team regarding status of C. Madsen communications and next steps related to other defendants including the pending sales of real property.	0.20	63.75
07/26/23	Kara B. Hendricks	Revise stipulation regarding Madsen motion and provide to J. Giardino for consideration and approval and finalize same (.1); Review multiple emails from J. Giardino with additional documents requested including certified statements and bank records and discuss review with C. Spaulding (.3);	0.40	192.10
07/26/23	Kara B. Hendricks	Follow-up with C. Fronk regarding sale of Rosegreen condo (.1); Request C. Spaulding's assistance with further follow-up and finalizing same (.1);	0.20	96.05
07/26/23	Kara B. Hendricks	Attention to email regarding request for investor list and efforts made by third parties to contact investors;	0.10	48.03
07/26/23	Kara B. Hendricks	Review order granting motion to extend discovery;	0.10	48.03
07/26/23	Kara B. Hendricks	Pick up records from C. Madsen and get explanation of what was provided and provide to S. Morrill for review (.4); update G. Winkler regarding records received and discuss next steps in evaluation with G. Winkler and C. Spaulding (.3);	0.70	336.18
07/26/23	Kara B. Hendricks	Review discovery requests to J&J and follow-up with C. Spaulding regarding scope and objections;	0.20	96.05
07/26/23	Kara B. Hendricks	Follow-up with G. Winkler and A. Priebe regarding status report;	0.10	48.03
07/26/23	Christian Spaulding	Confer with K. Hendricks, S. Morrill, and G. Winkler regarding conference with C. Madsen, funds received and strategy regarding turnover of funds and documents.	0.60	191.25
07/26/23	Christian Spaulding	Confer with team regarding upcoming matters and coverage for matters during week of 7/31.	0.30	95.63
07/26/23	Christian Spaulding	Evaluate correspondence from counsel for C. Madsen and documents therewith (.7); confer with team regarding the documents produced were already produced and did not contain any new information (.5)	1.20	382.47
07/27/23	Kyle Ewing	Conference with K. Hendricks re: status of stipulation and order to continue Monday's hearing re: Madsen motion for an order to show cause and plan for hearing attendance in the case that court denies stipulation or does not enter order before the hearing	0.20	68.00
07/27/23	Kara B. Hendricks	Email J. Giardino confirming receipt of documents from C. Madsen and follow-up regarding additional back-up requested;	0.10	48.03
07/27/23	Kara B. Hendricks	Prepare summary of pending motion to be included in status report and correspond	0.30	144.08

07/27/23	Kara B. Hendricks	with A. Preibe regarding same; Participate in call with G. Winkler, A. Priebe, J. delCastillo regarding case matters including communication with defendants, investor outreach, asset recovery, subpoenas and pending discovery;	0.40	192.10
07/27/23	Kara B. Hendricks	Follow-up with C. Spaulding regarding response to SEC discovery and communications with G. Winkler regarding pre-receivership documents;	0.10	48.03
07/27/23	Kara B. Hendricks	Discuss M. Murphy RV concerns with A. Levin and review and forward documents relating to dispute;	0.40	192.10
07/27/23	Kara B. Hendricks	Correspond with J. McGraw regarding status report;	0.10	48.03
07/27/23	Akke Levin	Review correspondence related to RV and ownership of same and letter of Mark Cook re same in preparation for Monday call (.3); brief inquiry into formation date of LLC and ownership of RV and discuss same with Kara Hendricks (.2)	0.50	233.75
07/27/23	Steph Morrill	Update GT received records and Box document index, at current stage, for circulation to Milana Barkhanoy, and Grace Radke of AFS, and K.Hendricks;	0.40	70.00
07/27/23	Steph Morrill	Focusing on Beasleys, J&J Consulting, Larry Jeffery, Seth Johnson, and Jason Jongeward (collection of 497 records), continue effort to identify Date Received and Received From information for records which remain unorganized within Box, and simultaneously, update the GT received records and Box document index;	2.20	385.00
07/28/23	Akke Levin	Review and make suggested changes to draft status report.	0.30	140.25
07/28/23	Christian Spaulding	Evaluate communications from L. Maningo regarding W. Rosegreen condo and additional funds and email in response.	0.20	63.75
07/28/23	Christian Spaulding	Communications with team regarding responses to discovery requests.	0.20	63.75
07/31/23	Akke Levin	Participate in call with Mark Cook (counsel for Mark Murphy) re assets, value and recovery and email to Geoff Winkler re same (.3); oversee filing of various reports (.2).	0.50	233.75
07/31/23	Christian Spaulding	Communications with W. Welch-Kirmse regarding notice of lis pendens for R. Madsen's Duck Creek, UT property and review file for documents needed to finalize the same.	0.40	127.50
07/31/23	Whitney Welch-Kirmse	Draft Notice of Lis Pendens for Madsen UT property.	1.50	637.50

Total Hours: 49.10

Total Amount: \$ 19,500.69

TIMEKEEPER SUMMARY FOR TASK CODE GW001,

ASSET ANALYSIS AND RECOVERY

Summary of Fees (Base Rates)

<u>Timekeeper Name</u>	<u>Hours Billed</u>	<u>Base Rate</u>	<u>Total \$ Amount</u>
Kara B. Hendricks	25.30	565.00	14,294.50
Kyle Ewing	0.80	400.00	320.00
Christian Spaulding	13.90	375.00	5,212.50
Akke Levin	1.30	550.00	715.00
Whitney Welch-Kirmse	2.70	500.00	1,350.00
Steph Morrill	5.10	295.00	1,504.50
Totals:	49.10		\$ 23,396.50

Summary of Fees (Discounted Rates)

<u>Timekeeper Name</u>	<u>Hours Billed</u>	<u>Average Discounted Rate</u>	<u>Total \$ Amount</u>
Kara B. Hendricks	25.30	480.25	12,150.31
Kyle Ewing	0.80	340.00	272.00
Christian Spaulding	13.90	318.75	4,430.63
Akke Levin	1.30	467.50	607.75
Whitney Welch-Kirmse	2.70	425.00	1,147.50
Steph Morrill	5.10	175.00	892.50
Totals:	49.10		\$ 19,500.69

TASK CODE: GW004 CASE ADMINISTRATION

<u>DATE</u>	<u>TIMEKEEPER</u>	<u>DESCRIPTION</u>	<u>HOURS</u>	<u>AMOUNT</u>
07/10/23	Kara B. Hendricks	Correspond with G. Winkler regarding response to discovery motion filed by R. Madsen;	0.20	96.05
07/11/23	Steph Morrill	Prepare matter status chart to be used during weekly GT team meetings;	0.40	70.00
07/13/23	Steph Morrill	Update matter status chart and circulate to K.Hendricks and C.Spaulding (1.0); Provide materials related to Grisgby and requested by G.Winkler via sharefile (.2);	1.20	210.00
07/19/23	Kara B. Hendricks	Attention to SEC discovery requests to J&J entities and discuss objections and limited response to same with C. Spaulding;	0.20	96.05
07/19/23	Steph Morrill	Attention to K.Hendricks task assignment email and procure copies of objections to mobile carrier subpoena duces tecum for review;	0.50	87.50
07/20/23	Steph Morrill	Update pleadings and discovery chart in preparation of, and engage in, weekly team meeting and matter status check, with K.Hendricks and C.Spaulding;	0.40	70.00
			Total Hours:	2.90
			Total Amount:	\$ 629.60

TIMEKEEPER SUMMARY FOR TASK CODE GW004.

CASE ADMINISTRATION

Summary of Fees (Base Rates)

<u>Timekeeper Name</u>	<u>Hours Billed</u>	<u>Base Rate</u>	<u>Total \$ Amount</u>
Kara B. Hendricks	0.40	565.00	226.00
Steph Morrill	2.50	295.00	737.50
Totals:	2.90		\$ 963.50

Summary of Fees (Discounted Rates)

<u>Timekeeper Name</u>	<u>Hours Billed</u>	<u>Average Discounted Rate</u>	<u>Total \$ Amount</u>
Kara B. Hendricks	0.40	480.25	192.10
Steph Morrill	2.50	175.00	437.50
Totals:	2.90		\$ 629.60

TASK CODE: GW005 CLAIMS ADMINISTRATION AND OBJECTIONS

<u>DATE</u>	<u>TIMEKEEPER</u>	<u>DESCRIPTION</u>	<u>HOURS</u>	<u>AMOUNT</u>
07/05/23	Kara B. Hendricks	Review and revise investor update and correspond with A. Priebe regarding same;	0.30	144.08
07/10/23	Kara B. Hendricks	Correspond with A. Preibe regarding investor questions and upcoming hearing and provide comments regarding proposed outline;	0.30	144.08
			Total Hours:	0.60
			Total Amount:	\$ 288.16

TIMEKEEPER SUMMARY FOR TASK CODE GW005,

CLAIMS ADMINISTRATION AND OBJECTIONS

Summary of Fees (Base Rates)

<u>Timekeeper Name</u>	<u>Hours Billed</u>	<u>Base Rate</u>	<u>Total \$ Amount</u>
Kara B. Hendricks	0.60	565.00	339.00
Totals:	0.60		\$ 339.00

Summary of Fees (Discounted Rates)

<u>Timekeeper Name</u>	<u>Hours Billed</u>	<u>Average Discounted Rate</u>	<u>Total \$ Amount</u>
Kara B. Hendricks	0.60	480.27	288.16
Totals:	0.60		\$ 288.16

TASK CODE: GW012 LITIGATION CONSULTING

<u>DATE</u>	<u>TIMEKEEPER</u>	<u>DESCRIPTION</u>	<u>HOURS</u>	<u>AMOUNT</u>
07/11/23	Rowena Santos	Prepare draft meet and confer correspondence including review of objections to phone subpoenas from defendants and phone carriers.	3.10	1,317.50
			Total Hours:	3.10
			Total Amount:	\$ 1,317.50

TIMEKEEPER SUMMARY FOR TASK CODE GW012.

LITIGATION CONSULTING

Summary of Fees (Base Rates)

<u>Timekeeper Name</u>	<u>Hours Billed</u>	<u>Base Rate</u>	<u>Total \$ Amount</u>
Rowena Santos	3.10	500.00	1,550.00
Totals:	3.10		\$ 1,550.00

Summary of Fees (Discounted Rates)

<u>Timekeeper Name</u>	<u>Hours Billed</u>	<u>Average Discounted Rate</u>	<u>Total \$ Amount</u>
Rowena Santos	3.10	425.00	1,317.50
Totals:	3.10		\$ 1,317.50

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

<u>Timekeeper</u>	<u>Hours</u>	<u>Rate</u>	<u>Amount</u>
Kara B. Hendricks	26.30	565.00	14,859.50
Kyle Ewing	0.80	400.00	320.00
Rowena Santos	3.10	500.00	1,550.00
Christian Spaulding	13.90	375.00	5,212.50
Akke Levin	1.30	550.00	715.00
Whitney Welch-Kirmse	2.70	500.00	1,350.00
Steph Morrill	7.60	295.00	2,242.00
	<hr/>	<hr/>	<hr/>
Totals:	55.70		\$ 26,249.00

Summary of Fees (Discounted Rates)

<u>Timekeeper</u>	<u>Hours</u>	<u>Rate</u>	<u>Amount</u>
Kara B. Hendricks	26.30	480.25	12,630.57
Kyle Ewing	0.80	340.00	272.00
Rowena Santos	3.10	425.00	1,317.50
Christian Spaulding	13.90	318.75	4,430.63
Akke Levin	1.30	467.50	607.75
Whitney Welch-Kirmse	2.70	425.00	1,147.50
Steph Morrill	7.60	175.00	1,330.00
	<hr/>	<hr/>	<hr/>
Totals:	55.70		\$ 21,735.95

Invoice No.: 1000400792
Re: SEC v. Beasley (Geoff Winkler, Receiver)
Matter No.: 209375.010100

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Description of Expenses Billed:

<u>DATE</u>	<u>DESCRIPTION</u>		<u>AMOUNT</u>
05/31/23	Kinsey, Teri INVOICE#: 2335 DATE: 6/13/2023 - Nevada Secretary of State - Annual List fee and Business License fee for J&J Consulting Services, Inc.	\$	650.00
	Total Expenses:	\$	650.00



Invoice No. : 1000453632
File No. : 209375.010100
Bill Date : October 16, 2023

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

Attn: Geoff Winkler

INVOICE

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

Legal Services through September 30, 2023:

Total Fees: \$ 34,339.63

Expenses:

Local Travel 15.00

Total Expenses: \$ 15.00

Current Invoice: \$ 34,354.63

Previous Balance (see attached statement): \$ 189,614.23

Total Amount Due: \$ 223,968.86

KBH:LC
Tax ID: 13-3613083



Invoice No.: 1000453632
File No.: 209375.010100

Important: If you receive a request to change the manner or location of your payment to Greenberg Traurig, please immediately contact Greenberg Traurig's accounting team at 305-418-6503. To assure that your payment is made and received correctly, please do not make any payment per the requested change until you verbally confirm with Greenberg Traurig that the change is legitimate.

REMITTANCE ADVICE

PLEASE RETURN WITH YOUR PAYMENT

Note: Payment is Due 30 Days from Date of Invoice

CLIENT NAME: WINKLER, GEOFF
FILE NUMBER: 209375.010100
INVOICE NUMBER: 1000453632*
BILLING PROFESSIONAL: Kara B. Hendricks

Current Invoice:	\$	34,354.63
Previous Balance:	\$	189,614.23
Total Amount Due:	\$	223,968.86

FOR YOUR CONVENIENCE, WIRE TRANSFER FUNDS TO:

For Wire Instructions:

Bank: WELLS FARGO BANK
ABA #: 121000248

For ACH Instructions:

Bank: WELLS FARGO BANK
ABA#: 063107513

CREDIT TO: GREENBERG TRAUIG DEPOSITORY ACCOUNT
ACCOUNT #: 2000014648663

PLEASE

REFERENCE: **CLIENT NAME:** WINKLER, GEOFF
FILE NUMBER: 209375.010100
INVOICE NUMBER: 1000453632*
BILLING
PROFESSIONAL: Kara B. Hendricks

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

Greenberg Traurig
PO Box 936769

KBH:LC

Tax ID: 13-3613083



Invoice No. : 1000453632
File No. : 209375.010100

ATLANTA GA 31193-6769

Wire fees may be assessed by your bank.

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

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

KBH:LC

Tax ID: 13-3613083



Invoice No. : 1000453632
 File No. : 209375.010100

Account Statement

<u>Date</u>	<u>Invoice #</u>	<u>Fees Due</u>	<u>Expenses Due</u>	<u>Other Due</u>	<u>Total Due</u>
07/19/22	1000035547	16,627.52	0.00	0.00	16,627.52
10/03/22	1000096060	12,029.69	0.00	0.00	12,029.69
11/09/22	1000142381	16,674.86	0.00	0.00	16,674.86
11/09/22	1000142507	8,666.16	0.00	0.00	8,666.16
02/14/23	1000224348	14,644.91	0.00	0.00	14,644.91
02/14/23	1000224438	12,682.94	0.00	0.00	12,682.94
02/14/23	1000224498	11,834.06	0.00	0.00	11,834.06
05/15/23	1000315147	6,912.96	0.00	0.00	6,912.96
05/15/23	1000315185	7,047.65	0.00	0.00	7,047.65
06/09/23	1000340006	7,584.77	0.00	0.00	7,584.77
08/14/23	1000395478	11,716.78	0.00	0.00	11,716.78
08/14/23	1000395520	6,298.65	0.00	0.00	6,298.65
08/24/23	1000400792	21,735.95	650.00	0.00	22,385.95
09/15/23	1000425099	34,349.83	157.50	0.00	34,507.33
	Totals:	\$ 188,806.73	\$ 807.50	\$ 0.00	\$ 189,614.23

KBH:LC

Tax ID: 13-3613083

Description of Professional Services Rendered:

TASK CODE: GW001 ASSET ANALYSIS AND RECOVERY

<u>DATE</u>	<u>TIMEKEEPER</u>	<u>DESCRIPTION</u>	<u>HOURS</u>	<u>AMOUNT</u>
09/01/23	Kara B. Hendricks	Revise status report and incorporate G. Winkler revisions to same;	0.80	384.20
09/01/23	Kara B. Hendricks	Confer with G. Winkler, C. Fronk and S. Kamaraju regarding C. Madsen assets and proposed compromise (.5); Follow-up discussion with C. Fronk (.2); Discuss next steps with G. Winkler (.1);	0.80	384.20
09/01/23	Akke Levin	Emails with AT&T records production [0.1] and review scope of same [0.4].	0.50	233.75
09/01/23	Christian Spaulding	Continue and finalize draft of response to written discovery requests propounded by the SEC and communications with team regarding the same.	2.60	828.75
09/04/23	Kara B. Hendricks	Receipt of bank statements from J. Humphries and forward to S. Morrill;	0.10	48.02
09/04/23	Kara B. Hendricks	Revise motion regarding Eco Battery distribution and follow-up with C. Spaulding on areas needing further attention;	1.30	624.32
09/05/23	Kara B. Hendricks	Update status report and incorporate D. Ellingson comments;	0.90	432.23
09/05/23	Kara B. Hendricks	Follow-up with H. Hatfield regarding Eco Battery meeting; Follow-up with A. Grigsby regarding meeting to discuss turnover issues;	0.20	96.05
09/05/23	Kara B. Hendricks	Follow-up with A. Levin regarding telephone subpoena records received and next steps;	0.10	48.02
09/05/23	Kara B. Hendricks	Follow-up with G. Winkler regarding status report regarding professionals; Respond to email from J. del Castillo regarding same; Finalize status report;	0.30	144.07
09/05/23	Akke Levin	Conduct review of documents produced by AT&T [1.0]; email Kara Hendricks re same [0.1].	1.10	514.25
09/06/23	Kara B. Hendricks	Follow-up with C. Spaulding regarding Eco Battery distribution motion; Correspond with G. Winkler regarding communication with Eco Battery counsel and next steps;	0.20	96.05
09/06/23	Kara B. Hendricks	Attention to email from L. Seybert regarding attorney fee distribution and follow-up with G. Winkler;	0.10	48.02
09/06/23	Akke Levin	Analyze AT&T phone reports for scope and content [0.9]; assign work re same to Steph Morrill [0.2]; email to Geoff Winkler re receipt of records [0.1].	1.20	561.00

09/06/23	Steph Morrill	Conference with A.Levin regarding AT&T subpoena records and removal of portions related to third-party phone number identified after information provided to AT&T to run searches, and regarding need to send response documents to Receiver team;	0.30	52.50
09/07/23	Kara B. Hendricks	Review correspondence from H. Hatfield and follow-up with G. Winkler regarding Eco Battery concerns;	0.10	48.02
09/07/23	Kara B. Hendricks	Follow-up with J. Rickard regarding Oberheiden subpoena, review correspondence from Oberheiden firm and discuss next steps with J. Rickard;	0.20	96.05
09/07/23	Kara B. Hendricks	Attention to email from J. Giardino regarding Madsen turnover issues, confer with G. Winkler regarding same and respond to J. Giardino email with proposal;	0.40	192.10
09/07/23	Akke Levin	Discuss content of AT&T phone reports with Steph Morrill [0.3]; strategy re same [0.2]; outline strategy re same [0.1].	0.60	280.50
09/07/23	Steph Morrill	Review AT&T records, produced in response to subpoena duces tecum, in order to identify content for removal related to phone number 321-3655, as requested by A.Levin (2.8); Telephone conference with A.Levin regarding seemingly duplicative reports, review of 321-3655 related entries and where in the AT&T reports the data is present and potential next steps regarding removing content (.5); Correspondence to Receiver and Jason Kellogg regarding confidential nature of 321-3655 related information and transmittal of AT&T reports (.3);	3.60	630.00
09/07/23	Christian Spaulding	Communications with C. Fronk regarding deadline to respond to written discovery requests.	0.20	63.75
09/07/23	Christian Spaulding	Continue review of documents produced by Eco Battery to determine need for any additional documents and pertinent information located therein.	6.90	2,199.38
09/08/23	Kara B. Hendricks	Confer with G. Winkler regarding C. Madsen requests and follow-up with J. Giardino (.2); Attention to email from L. Maningo regarding Seybert, discuss with G. Winkler, follow-up with C. Fronk and respond to L. Maningo inquiry (.2);	0.40	192.10
09/08/23	Kara B. Hendricks	Follow-up with C. Spaulding regarding Eco Battery background and distribution motion including loan to Jongeward;	0.20	96.18
09/08/23	Steph Morrill	Update pleadings and discovery chart with pertinent details from recent filings and related project updates and overall matter status;	0.70	122.50
09/08/23	Christian Spaulding	Review and revise draft of Motion to Distribute Eco Battery funds with	2.70	860.56

		additional information pertaining to other funds and incorporation of comments by K. Hendricks		
09/08/23	Christian Spaulding	Evaluate documents in file related to transfer of funds to Eco Battery and bank statements pertaining to the same for use in Motion to Distribute Eco Battery Funds.	2.00	637.50
09/11/23	Kara B. Hendricks	Attention to emails from A. Levin regarding communication with phone companies regarding subpoenas;	0.10	48.02
09/11/23	Kara B. Hendricks	Attention to email from J. Giradino regarding C. Madsen turnover and follow-up with G. Winkler regarding same;	0.60	288.15
09/11/23	Akke Levin	Respond to J. Giardino email and confer with G. Winkler regarding stipulation; Telephone conference with T-Mobile re status of documents [0.1]; email to Kara Hendricks re same [0.1].	0.20	93.50
09/11/23	Christian Spaulding	Communications regarding J. Giardino's request to continue hearing on Madsen Motion to Compel.	0.20	63.75
09/11/23	Christian Spaulding	Finalize stipulation to continue C. Madsen hearing on Motion to Compel for filing.	0.20	63.75
09/11/23	Christian Spaulding	Draft stipulation and proposed order to continue hearing on Motion to Compel Re: C. Madsen.	0.30	95.63
09/13/23	Kara B. Hendricks	Review docket and prepare for upcoming status hearing;	0.20	96.05
09/13/23	Kara B. Hendricks	Revise motion to distribute funds to Eco Battery and correspond with G. Winkler regarding same (1.1); Follow-up with C. Spaulding regarding information requested for Eco Battery demand letter (.3); Discuss numbers referenced in motion with G. Winkler and review related emails (.2);	1.60	768.40
09/13/23	Kara B. Hendricks	Confer with W. Welch-Kirmse regarding R. Madsen lis pendens issues;	0.10	48.02
09/13/23	Steph Morrill	Continue evaluation of approx 286 unsigned purchase agreements contained in box hand-delivered by Chris Madsen, and prepare matrix of the information contained, in order to assess financial damages and investor information in full;	2.00	350.00
09/13/23	Christian Spaulding	Confer with K. Hendricks regarding eco battery documents and status of review.	0.20	63.75
09/13/23	Whitney Welch-Kirmse	Revise Lis Pendens per new information from defendant re family trust	0.80	340.00
09/14/23	Kara B. Hendricks	Review status report and follow-up regarding pending matters in preparation for status hearing;	0.60	288.15
09/14/23	Kara B. Hendricks	Attend status hearing and confer with G. Winkler prior to and after same regarding case issues;	2.30	1,104.57
09/14/23	Kara B. Hendricks	Review information compiled by S. Morrill relating to C. Madsen documents and contract information and correspond with G. Winkler and J. Hall regarding same;	0.50	240.12

09/14/23	Kara B. Hendricks	Follow-up with C. Spaulding regarding revisions to Eco Battery motion and information needed for demand letter;	0.10	48.02
09/14/23	Kara B. Hendricks	Discuss revisions to discovery; Review information from W. Welch-Kirmse regarding Duck Creek lis pendens; Email D. O'Toole to get additional information regarding R. Madsen trust;	0.20	96.05
09/14/23	Steph Morrill	Finish evaluation of approx 286 unsigned purchase agreements contained in box hand-delivered by Chris Madsen, and prepare matrix of the information contained, in order to assess financial damages and investor information in full (1.2); Correspondence to K.Hendricks and C.Spaulding providing summary of evaluation and spreadsheet of information (.4);	1.60	280.00
09/15/23	Kara B. Hendricks	Correspond with D. O'Toole regarding R. Madsen (.1); Attention to various emails from M. Cook and J. McGraw regarding motor home turnover (.1);	0.20	96.05
09/15/23	Kara B. Hendricks	Respond to email from M. Pham regarding Eco Battery payments (.1); Review loan documents and information regarding initial investments and confer with S. Morrill regarding same (.4); Review and revise motion for Eco Battery distribution and follow-up with C. Spaulding regarding investment numbers (1.6);	2.10	1,008.52
09/15/23	Steph Morrill	Review EcoBat records to identify JL2 investor loan group amounts to support the draft motion to distribute funds to the JL2 Investment Group members, and conference with K.Hendricks regarding same;	1.40	245.00
09/15/23	Christian Spaulding	Revise draft of Motion to Distribute funds per comments by G. Winkler and K. Hendricks and communications with team regarding the same.	1.90	605.63
09/17/23	Kara B. Hendricks	Update Eco Battery distribution motion and follow-up with C. Spaulding; Send draft motion to G. Winkler;	0.80	384.20
09/18/23	Kara B. Hendricks	Communicate with G. Winkler regarding Eco Battery motion and investor questions; Follow-up with S. Morrill regarding moving Eco Battery documents into relativity;	0.20	96.05
09/18/23	Kara B. Hendricks	Telephone call with D. O'Toole regarding R. Madsen matters including accounting and Duck Creek property; Update G. Winkler and J. McGraw;	0.40	192.10
09/18/23	Kara B. Hendricks	Attention to email from J. Jenne regarding investors and follow-up with G. Winkler (.1); Review motion to withdraw by A. Grigsby and correspond with G. Winkler regarding same (.2);	0.30	144.07

09/19/23	Kara B. Hendricks	Attention to email from J. Giardino regarding C. Madsen and follow-up with G. Winkler;	0.10	48.02
09/19/23	Kara B. Hendricks	Update Eco Battery motion; Follow-up with C. Spaulding regarding exhibits and finalize same;	1.10	528.27
09/19/23	Kara B. Hendricks	Review order on Grigsby motion to withdraw (.1); Attention to Order requiring issues with P. Beasley and A. Grigsby to be resolved by September 29 and identify who is responsible for each category and provide same to G. Winkler (.7); Follow-up with A. Grigsby and provide outline for discussion regarding court order (.1);	0.90	432.23
09/19/23	Steph Morrill	Conference with K.Hendricks regarding matter, project status updates, and upcoming assignments and filings (.2); Update Winkler pleadings and discovery chart with details from team conference (.4);	0.60	105.00
09/19/23	Steph Morrill	Reach out to Milana Barkhanoy regarding Relativity and upload of the EcoBattery and Eco Capital collections into same;	0.30	52.50
09/19/23	Christian Spaulding	Gather exhibits for Motion to Distribute EcoBattery funds and communicate with team regarding the same.	0.30	95.63
09/20/23	Kara B. Hendricks	Respond to email from J. Giardino regarding C. Madsen discussion; Respond to email from D. Kajoika regarding Grigsby meeting and follow-up with G. Winkler regarding same;	0.30	144.07
09/20/23	Christian Spaulding	Revise responses to SEC's Discovery Requests per comments by K. Hendricks.	2.30	733.13
09/21/23	Kara B. Hendricks	Participate in team call with G. Winkler, J. Hall, A. Priebe, J. del Castillo regarding case status, communication with defendants, forensic accounting and related matters;	0.40	192.10
09/21/23	Kara B. Hendricks	Attention to emails with Altherias regarding document issues and correspond with S. Morrill regarding same;	0.20	96.05
09/21/23	Kara B. Hendricks	Follow-up with J. Giardino regarding C. Madsen issues;	0.10	48.02
09/21/23	Steph Morrill	Per request by Jason Kellog, resend AT&T subpoena response documents (.2); Review Mark Murphy records in Box for J&J Tax Returns and conference with K.Hendricks and C.Spaulding on same, in relation to responses to SEC discovery requests for production (.4); Prepare 2017-2021 tax related documents for production, redacting as necessary, and finalize for service (2.8);	3.40	595.00
09/21/23	Christian Spaulding	Additional revisions to responses to SEC written discovery requests and email to G. Winkler regarding the same.	0.50	159.38
09/21/23	Christian Spaulding	Coordinate with S. Morrill regarding final versions of responses to written discovery	1.10	350.63

		requests and documents to be produced.		
09/22/23	Kara B. Hendricks	Follow-up with C. Spaulding regarding review of Eco Battery documents and begin preparation of demand letter;	0.70	336.17
09/22/23	Kara B. Hendricks	Correspond with J. Giardino re C. Madsen; Review and respond to email regarding Schoofey tax issue and have C. Spaulding review prior documents and discuss same;	0.30	144.07
09/22/23	Akke Levin	Check on status of T-Mobile subpoena response.	0.10	46.75
09/22/23	Christian Spaulding	Communications with K. Hendricks and S. Morrill regarding tax payments by P. Beasley on Schoofey property.	0.30	95.63
09/22/23	Christian Spaulding	Evaluate status of tax documents provided by P. Beasley with respect to Schoofey property and search property tax status with county assessor.	0.60	191.25
09/22/23	Christian Spaulding	Continue review of documents produced by Eco Battery.	6.50	2,071.88
09/22/23	Christian Spaulding	Continue draft of summary of documents produced by Eco Battery.	1.30	414.38
09/24/23	Kara B. Hendricks	Review minute order and transcript regarding required compliance by P. Beasley and A. Grigsby;	0.20	96.05
09/24/23	Kara B. Hendricks	Review summary of information regarding Eco Battery prepared by C. Spaulding and cross reference with prior analysis and findings and follow-up to clarify information for demand letter;	1.20	576.30
09/24/23	Christian Spaulding	Communications with K. Hendricks regarding Eco Battery documents and potential for claims arising therefrom.	0.20	63.75
09/25/23	Kara B. Hendricks	Confer with C. Spaulding regarding Eco Battery claims and documents supporting same (.5); Follow-up with S. Morrill regarding document needs (.1);	0.60	288.15
09/25/23	Kara B. Hendricks	Review time line and portions of hearing transcript relating to motion to compel P. Beasley and A. Grigsby (.8); Respond to email from D. Kajioka and follow-up with G. Winkler regarding A. Grigsby issues; Telephone call from D. Kajioka's office and follow-up (.4); Attempt to participate in meeting with A. Grigsby's counsel and G. Winkler (no appearance by Grigsby or Kajioka) (.3); Respond to additional email from D. Kajioka and provide information regarding items to be resolved by September 29 court deadline (.2); Follow-up with C. Spaulding regarding next steps (.2);	1.90	912.47
09/25/23	Kara B. Hendricks	Telephone call from M. Cook regarding AT&T subpoena; Attention to emails from A. Levin regarding subpoena response by T-Mobile;	0.20	96.05
09/25/23	Kara B. Hendricks	Attention to email from T. Elson regarding J. Jenne and follow-up with G. Winkler	0.10	48.02

		and J. Hall;		
09/25/23	Akke Levin	Telephone conference with T-Mobile re status and hurdles in T-Mobile's response to subpoena [0.2].	0.20	93.50
09/25/23	Akke Levin	Gather T-Mobile communications [0.2]; and draft email to T-Mobile re delay in response to subpoena, status of production, approval of opposing counsel, and request to forward to legal department [0.8].	1.00	467.50
09/25/23	Steph Morrill	Continue effort to identify Date Received and Received From information for records which remain unorganized within Box, and simultaneously, update the GT received records and Box document index;	3.50	612.50
09/25/23	Christian Spaulding	Confer with K. Hendricks regarding Eco Battery as it relates to documents and potential claims against.	0.50	159.38
09/26/23	Kara B. Hendricks	Conference call with G. Winkler, J. Giardino and S. Kamaraju regarding C. Madsen assets and turnover plan;	0.40	192.10
09/26/23	Kara B. Hendricks	Telephone call with D. Schiess regarding J&J document turnover and follow-up G. Winkler regarding next steps;	0.50	240.12
09/26/23	Kara B. Hendricks	Correspond with J. Kellogg regarding privilege issues relating to Judd/Beasley; Follow-up with J. Rickard regarding Oberheiden production; Review email from G. Winkler regarding request to US attorney for document turnover and follow-up;	0.40	192.10
09/26/23	Kara B. Hendricks	Attention to email from T. Elson regarding J. Jenne issues; Attention to emails from D. O'Tolle regarding R. Madsen;	0.20	96.05
09/26/23	Steph Morrill	Continue effort to identify Date Received and Received From information for records which remain unorganized within Box, and simultaneously, update the GT received records and Box document index;	0.50	87.50
09/26/23	Steph Morrill	Conference with K.Hendricks, and C.Spaulding regarding matter, project status updates, and upcoming assignments and filings;	0.30	52.50
09/26/23	Christian Spaulding	Meeting with S. Morrill and K. Hendricks regarding status of A. Grigsby and P. Beasley matters, upcoming deadlines, and communications with opposing counsel.	0.30	95.63
09/27/23	Kara B. Hendricks	Telephone call with G. Winkler regarding documents requested from government and P. Beasley; Prepare declaration for P. Beasley;	0.70	336.17
09/27/23	Kara B. Hendricks	Attention to email from J. McGraw regarding sale of Courtney Ridge and request C. Spaulding's assistance with stipulation to facilitate same;	0.10	48.02
09/27/23	Christian Spaulding	Locate relevant documents related to D. Hayes and confer with K. Hendricks regarding the same.	0.40	127.50

09/28/23	Kara B. Hendricks	Correspond with G. Winkler regarding P. Beasley matters;	0.10	48.02
09/28/23	Kara B. Hendricks	Participate in meeting with G. Winkler, J. Hall, A. Priebe, J. del Castillo and discuss bank records/forensic accounting, tax issues raised by defendants, asset recovery efforts, communication with defendants and related issues;	0.50	240.12
09/28/23	Akke Levin	Email from T-Mobile legal counsel regarding need for agreement on phone numbers [0.1]; gather and verify proposal and list of phone numbers [0.2] and draft email to opposing counsel re same [0.2].	0.50	233.75
09/28/23	Christian Spaulding	Review declaration of Paula Beasley	0.30	95.63
09/29/23	Kara B. Hendricks	Attention to letter from D. Kajoka regarding A. Grisby and follow-up with G. Winkler; Correspond with C. Spaulding regarding necessary motions;	0.40	192.10
09/29/23	Kara B. Hendricks	Respond to email from J. Rickard regarding Oberheiden subpoena and telephone call to discuss production concerns;	0.30	144.07
09/29/23	Kara B. Hendricks	Follow-up with C. Spaulding regarding Courtney Ridge stipulation(.1); Review and revise stipulation and send to J. McGraw for title review, T. Elson for review on behalf of Jennes, and C. Fronk (.6);	0.70	336.17
09/29/23	Akke Levin	Obtain confirmation re agreement on T-Mobile subpoena from opposing counsel; draft email to T-Mobile's legal department re same.	0.50	233.75
09/29/23	Christian Spaulding	Evaluate Eco Battery and their actions to date for potential claims and draft overview of the same.	4.90	1,561.88
09/29/23	Christian Spaulding	Evaluate relevant purchase documents and draft stipulation for the sale of 6175 Cortney Ridge.	1.40	446.25
09/29/23	Christian Spaulding	Communications with team regarding resolution proposal from A. Grigsby.	0.20	63.75
Total Hours:			92.20	
Total Amount:				\$ 32,418.63

TIMEKEEPER SUMMARY FOR TASK CODE GW001,

ASSET ANALYSIS AND RECOVERY

Summary of Fees (Base Rates)

<u>Timekeeper Name</u>	<u>Hours Billed</u>	<u>Base Rate</u>	<u>Total \$ Amount</u>
Kara B. Hendricks	29.00	565.00	16,385.00
Christian Spaulding	38.30	375.00	14,362.50
Akke Levin	5.90	550.00	3,245.00
Whitney Welch-Kirmse	0.80	500.00	400.00
Steph Morrill	18.20	295.00	5,369.00
Totals:	92.20		\$ 39,761.50

Summary of Fees (Discounted Rates)

<u>Timekeeper Name</u>	<u>Hours Billed</u>	<u>Average Discounted Rate</u>	<u>Total \$ Amount</u>
Kara B. Hendricks	29.00	480.25	13,927.25
Christian Spaulding	38.30	318.75	12,208.13
Akke Levin	5.90	467.50	2,758.25
Whitney Welch-Kirmse	0.80	425.00	340.00
Steph Morrill	18.20	175.00	3,185.00
Totals:	92.20		\$ 32,418.63

TASK CODE: GW004 CASE ADMINISTRATION

<u>DATE</u>	<u>TIMEKEEPER</u>	<u>DESCRIPTION</u>	<u>HOURS</u>	<u>AMOUNT</u>
09/06/23	Kara B. Hendricks	Review and revise Receiver responses to request for production of documents and correspond with C. Spaulding and G. Winkler regarding same;	1.20	576.30
09/21/23	Kara B. Hendricks	Review and revise responses to request for production and interrogatories (.7); Follow-up with C. Spaulding regarding same and additional information needed(.4); Requested S. Morrill do further review for tax records (.1); Email and phone call to C. Fronk regarding request for admissions (.2); Correspond with G. Winkler regarding responses (.3);	1.70	816.43
09/25/23	Kara B. Hendricks	Confer with AFS team, AItheras and S. Morrill to discuss document transition to Relativity and follow-up with S. Morrill regarding document priorities;	0.60	288.15
09/28/23	Kara B. Hendricks	Review and revise investor update and correspond with A. Priebe regarding same;	0.50	240.12
Total Hours:			4.00	
Total Amount:				\$ 1,921.00

TIMEKEEPER SUMMARY FOR TASK CODE GW004.

CASE ADMINISTRATION

Summary of Fees (Base Rates)

<u>Timekeeper Name</u>	<u>Hours Billed</u>	<u>Base Rate</u>	<u>Total \$ Amount</u>
Kara B. Hendricks	4.00	565.00	2,260.00
Totals:	4.00		\$ 2,260.00

Summary of Fees (Discounted Rates)

<u>Timekeeper Name</u>	<u>Hours Billed</u>	<u>Average Discounted Rate</u>	<u>Total \$ Amount</u>
Kara B. Hendricks	4.00	480.25	1,921.00
Totals:	4.00		\$ 1,921.00

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

<u>Timekeeper</u>	<u>Hours</u>	<u>Rate</u>	<u>Amount</u>
Kara B. Hendricks	33.00	565.00	18,645.00
Christian Spaulding	38.30	375.00	14,362.50
Akke Levin	5.90	550.00	3,245.00
Whitney Welch-Kirmse	0.80	500.00	400.00
Steph Morrill	18.20	295.00	5,369.00
	<hr/>	<hr/>	<hr/>
Totals:	96.20		\$ 42,021.50

Summary of Fees (Discounted Rates)

<u>Timekeeper</u>	<u>Hours</u>	<u>Rate</u>	<u>Amount</u>
Kara B. Hendricks	33.00	480.25	15,848.25
Christian Spaulding	38.30	318.75	12,208.13
Akke Levin	5.90	467.50	2,758.25
Whitney Welch-Kirmse	0.80	425.00	340.00
Steph Morrill	18.20	175.00	3,185.00
	<hr/>	<hr/>	<hr/>
Totals:	96.20		\$ 34,339.63

Invoice No.: 1000453632
Re: SEC v. Beasley (Geoff Winkler, Receiver)
Matter No.: 209375.010100

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Description of Expenses Billed:

<u>DATE</u>	<u>DESCRIPTION</u>		<u>AMOUNT</u>
08/25/23	VENDOR: Spaulding, Christian INVOICE#: 10505 DATE: 9/14/2023 Parking; 08/25/2023 Order to Show Cause Parking; Merchant: Flash Parking	\$	3.00
08/25/23	VENDOR: Spaulding, Christian INVOICE#: 10505 DATE: 9/14/2023 Parking; 08/25/2023 Client Meeting prior to hearing; Merchant: Tower 300 Parking	\$	12.00
	Total Expenses:	\$	15.00



Invoice No. : 1000458404
File No. : 209375.010100
Bill Date : October 17, 2023

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

Attn: Geoff Winkler

INVOICE

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

THIS INVOICE REPLACES INVOICE 1000425099

Total Fees: \$ 34,262.33

Expenses:

Filing Fees

157.50

Total Expenses: \$ 157.50

Current Invoice: \$ 34,419.83

Previous Balance (see attached statement): \$ 189,461.53

Total Amount Due: \$ 223,881.36

KBH:LC

Tax ID: 13-3613083



Invoice No.: 1000458404
File No.: 209375.010100

Important: If you receive a request to change the manner or location of your payment to Greenberg Traurig, please immediately contact Greenberg Traurig's accounting team at 305-418-6503. To assure that your payment is made and received correctly, please do not make any payment per the requested change until you verbally confirm with Greenberg Traurig that the change is legitimate.

REMITTANCE ADVICE

PLEASE RETURN WITH YOUR PAYMENT

Note: Payment is Due 30 Days from Date of Invoice

CLIENT NAME: WINKLER, GEOFF
FILE NUMBER: 209375.010100
INVOICE NUMBER: 1000458404*
BILLING PROFESSIONAL: Kara B. Hendricks

Current Invoice:	\$	34,419.83
Previous Balance:	\$	189,461.53
Total Amount Due:	\$	223,881.36

FOR YOUR CONVENIENCE, WIRE TRANSFER FUNDS TO:

For Wire Instructions:

Bank: WELLS FARGO BANK
ABA #: 121000248

For ACH Instructions:

Bank: WELLS FARGO BANK
ABA#: 063107513

CREDIT TO: GREENBERG TRAUIG DEPOSITORY ACCOUNT
ACCOUNT #: 2000014648663

PLEASE

REFERENCE: **CLIENT NAME:** WINKLER, GEOFF
FILE NUMBER: 209375.010100
INVOICE NUMBER: 1000458404*
BILLING
PROFESSIONAL: Kara B. Hendricks

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

Greenberg Traurig
PO Box 936769

KBH:LC

Tax ID: 13-3613083



Invoice No. : 1000458404
File No. : 209375.010100

ATLANTA GA 31193-6769

Wire fees may be assessed by your bank.

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

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

KBH:LC

Tax ID: 13-3613083



Invoice No. : 1000458404
 File No. : 209375.010100

Account Statement

<u>Date</u>	<u>Invoice #</u>	<u>Fees Due</u>	<u>Expenses Due</u>	<u>Other Due</u>	<u>Total Due</u>
07/19/22	1000035547	16,627.52	0.00	0.00	16,627.52
10/03/22	1000096060	12,029.69	0.00	0.00	12,029.69
11/09/22	1000142381	16,674.86	0.00	0.00	16,674.86
11/09/22	1000142507	8,666.16	0.00	0.00	8,666.16
02/14/23	1000224348	14,644.91	0.00	0.00	14,644.91
02/14/23	1000224438	12,682.94	0.00	0.00	12,682.94
02/14/23	1000224498	11,834.06	0.00	0.00	11,834.06
05/15/23	1000315147	6,912.96	0.00	0.00	6,912.96
05/15/23	1000315185	7,047.65	0.00	0.00	7,047.65
06/09/23	1000340006	7,584.77	0.00	0.00	7,584.77
08/14/23	1000395478	11,716.78	0.00	0.00	11,716.78
08/14/23	1000395520	6,298.65	0.00	0.00	6,298.65
08/24/23	1000400792	21,735.95	650.00	0.00	22,385.95
10/16/23	1000453632	34,339.63	15.00	0.00	34,354.63
	Totals:	\$ 188,796.53	\$ 665.00	\$ 0.00	\$ 189,461.53

KBH:LC

Tax ID: 13-3613083

Description of Professional Services Rendered:

TASK CODE: GW001 ASSET ANALYSIS AND RECOVERY

<u>DATE</u>	<u>TIMEKEEPER</u>	<u>DESCRIPTION</u>	<u>HOURS</u>	<u>AMOUNT</u>
08/02/23	Christian Spaulding	Evaluate previous communications with Rosegreen, documents produced, and pertinent information pertaining to the same.	1.70	541.87
08/03/23	Kyle Ewing	Review and finalize stipulation and order re: sale of 3795 Canis property in preparation for approving the same for filing; email communication with C. Spaulding re: the same	0.10	34.00
08/03/23	Kyle Ewing	Email communication with G. Winkler and K. Hendricks re: the court's request to consolidate motion hearings with next status conference;	0.20	68.00
08/03/23	Christian Spaulding	Work to finalize stipulation and order for the sale of property held by W. Rosegreen and coordinate filing of the same.	1.40	446.25
08/04/23	Christian Spaulding	Draft response to written discovery requests from the SEC (1.4); confer with team regarding the same (.3)	1.70	541.87
08/07/23	Kara B. Hendricks	Review correspondence from H. Hatfield regarding Eco Battery and respond to schedule meeting (.1); Correspond with G. Winkler regarding meeting in Hurricane Utah and follow-up with K. Ewing and C. Spaulding regarding document review (.3); Attention to emails from G. Winkler regarding potential distribution of funds collected and Jongeward request (.2);	0.60	288.15
08/07/23	Kara B. Hendricks	Attention to emails from L. Maningo regarding Seybert including funds to be sent to receiver and next step to unfreeze certain accounts and follow-up with G. Winkler and L. Maningo regarding same;	0.30	144.08
08/07/23	Kara B. Hendricks	Review emails regarding status of third party action and potential for mediation;	0.10	48.03
08/07/23	Kara B. Hendricks	Correspond with C. Spaulding regarding written discovery requested by SEC and review emails from C. Fronk regarding same;	0.20	96.05
08/07/23	Christian Spaulding	Confer with team regarding response to SEC discovery requests and email to C. Fronk regarding the same.	0.20	63.81
08/08/23	Kara B. Hendricks	Attention to email from H. Hatfield regarding Eco Battery meeting and correspond with G. Winkler regarding strategy and next steps;	0.40	192.10
08/08/23	Kara B. Hendricks	Review order allowing for sale of Canis	0.10	47.86

08/08/23	Kara B. Hendricks	Minor property and follow-up with J. McGraw regarding same; Discuss Eco Battery distribution options with G. Winkler (.1); Call with G. Winkler, L. Abbot, M. Welsh, T. Combs regarding Eco Battery distributions and non- J&J investor payments and C. Madsen issues (.6);	0.70	336.18
08/08/23	Kara B. Hendricks	Follow-up with C. Spaulding regarding pending matters including Eco Battery document review, C. Madsen materials provided, and preparation of motion relating to JL2 investors;	0.30	144.08
08/08/23	Steph Morrill	Focusing on Jason Jongeward, continue effort to identify Date Received and Received From information for records which remain unorganized within Box, and simultaneously, update the GT received records and Box document index;	0.40	70.00
08/09/23	Kara B. Hendricks	Telephone call with J. Kellogg regarding outstanding document requests from US Attorney and phone providers (.1); Follow-up with A. Levine regarding responses to phone subpoena letters and next steps (.2);	0.30	144.08
08/09/23	Kara B. Hendricks	Attention to emails regarding finalizing sale of Canis Minor property and information needed from W. Rosegreen to facilitate same;	0.10	48.03
08/09/23	Akke Levin	Discuss outstanding subpoenas and objections with Kara Hendricks.	0.20	93.50
08/09/23	Christian Spaulding	Evaluate prior correspondence with EcoBattery and counsel and review file and documents to date for current status of payments, obligations, and other requests.	3.80	1,211.25
08/09/23	Christian Spaulding	Evaluate documents produced by Porter Hedges on behalf of Eco Battery and determine responsiveness to previous requests (2.1), draft summary of documents and analysis of documents and information still outstanding (1.0)	3.10	988.12
08/10/23	Kara B. Hendricks	Follow-up with J. Giradino regarding C. Madsen information;	0.10	48.03
08/10/23	Kara B. Hendricks	Review summary of information provided by Eco Battery and correspond with G. Winkler regarding same; Follow-up with H. Hatfield regarding meeting with Eco Battery principals;	0.40	192.10
08/10/23	Kara B. Hendricks	Participate in call with G. Winkler, J. Hall, A. Preibe and J. delCastillo and discuss forensic accounting, asset recovery efforts, pending matters including those with C. Madsen and D. Seybert; upcoming hearings and case issues;	0.60	288.15
08/10/23	Kara B. Hendricks	Correspond with G. Winkler regarding Jongeward investor, and communication from Godaddy account (.2); Attention to	0.30	144.08

08/10/23	Kara B. Hendricks	emails regarding M. Murphy assets (.1): Discuss phone subpoena issues with A. Levine;	0.10	48.03
08/11/23	Kara B. Hendricks	Discuss phone subpoena issues with A. Levin and review email with AT&T;	0.20	96.05
08/11/23	Akke Levin	Call Verizon, T-Mobile, and AT&T for status on subpoena production (.5); review subpoenas and prepare documents per request of AT&T records department and email re same (.6); narrow down list per telephone numbers involving privilege issues and prepare to follow up with T-Mobile and Verizon (.4)	1.50	701.25
08/12/23	Steph Morrill	Commence review of purchase agreements, both executed and draft, contained in box hand-delivered by Chris Madsen, and prepare matrix of the information contained in each agreement in order to assess financial damages and investor information in full;	2.40	420.00
08/14/23	Kara B. Hendricks	Correspond with L. Maningo regarding Seybert stipulation;	0.10	48.03
08/14/23	Kara B. Hendricks	Attention to emails and information from A. Levin regarding phone subpoena progress and phone call to discuss (.3); Prepare update and proposal for G. Winkler regarding same (.2)	0.50	240.13
08/14/23	Akke Levin	Draft update email to Kara Hendricks re issues with T-Mobile cost estimate and potential approval requirements (.1); strategy re limitation of scope and time period and review complaint for same (.3); share and discuss strategy with Kara Hendricks (.1)	0.50	233.75
08/14/23	Akke Levin	Draft email to Verizon confirming record gathering, narrowed-down list of phone numbers, and agreement with opposing counsel related to same;	0.40	187.00
08/14/23	Akke Levin	Calls to and from Verizon and T-Mobile about status of record gathering, objections of opposing counsel, narrowing of subpoenas, cost issues and approval for production of archived records (T-Mobile)	0.90	420.75
08/15/23	Kara B. Hendricks	Telephone call with G. Winkler to discuss C. Madsen communication and upcoming Eco Battery meeting (.4); Review Eco Battery communication and follow-up with H. Hatfield regarding document concern (.2); Correspond with C. Fronk regarding C. Madsen (.1);	0.70	336.18
08/15/23	Kara B. Hendricks	Review correspondence from counsel for C. Madsen regarding settlement calculations and follow-up with G. Winkler; Follow-up with C. Spaulding regarding fees associated with preparation of Madsen motion;	0.40	192.10
08/15/23	Kara B. Hendricks	Correspond with G. Winkler regarding	0.20	96.05

		attorneys formerly representing Judd; Review correspondence from J. Hall regarding bank contacts and J. del Castillo response;		
08/15/23	Kara B. Hendricks	Review email regarding status of third party litigation; Correspond with J. Kellogg regarding potential mediators;	0.10	48.03
08/15/23	Kara B. Hendricks	Telephone call with Eco Battery representatives and counsel regarding document request and payment of Jager ownership interest (.4); Follow-up call with G. Winkler regarding next steps (.3);	0.70	336.18
08/15/23	Steph Morrill	Evaluate received Chris Humphries July 2023 bank statements, Eco Battery Production and continue effort to identify Date Received and Received From information for records which remain unorganized within Box, and simultaneously, update the GT received records and Box document index;	0.30	52.50
08/15/23	Christian Spaulding	Evaluate invoices and charges related to fees incurred in drafting Motion to Compel Re: C. Madsen.	0.50	159.37
08/15/23	Christian Spaulding	Review notes regarding statements by Judd regarding purchase agreement and communications with G. Winkler regarding the same.	0.20	63.75
08/15/23	Christian Spaulding	Participate in conference call regarding Eco Battery with G. Winkler, K. Hendricks, and Opposing counsel and parties.	0.40	127.50
08/15/23	Christian Spaulding	Communications with team regarding finalized drafts of filings and approval of the same.	0.30	95.62
08/15/23	Christian Spaulding	Confer with K. Hendricks regarding documents received from Eco Battery and needed additional documents.	0.20	63.75
08/16/23	Kara B. Hendricks	Telephone call with G. Winkler regarding Beasley interview and further follow-up needed regarding defendants and prior counsel for J&J;	0.40	192.10
08/16/23	Kara B. Hendricks	Confer with A. Levin regarding phone subpoena issues and further refining same to expedite record production and work through concerns raised by Defendants;	0.20	96.05
08/16/23	Kara B. Hendricks	Review proposed Seybert stipulation and follow-up with L. Maningo regarding account information;	0.20	96.05
08/16/23	Kara B. Hendricks	Request S. Morrill's assistance with identifying additional Eco Battery documents and confer regarding status of review of C. Madsen records and R. Madsen lis pendens;	0.30	144.08
08/16/23	Kara B. Hendricks	Review records relating to Oberheiden representation of J&J entities and prepare subpoena exhibit relating to same (1.8); Telephone call with J. Rickard regarding service of and handling of subpoena and	2.10	1,008.53

08/16/23	Kara B. Hendricks	follow-up email regarding same (.3); Correspond with M. Cook regarding state court proceedings against M. Murphy and impact of stay order; Review email from T. Elson regarding Jenne property;	0.10	48.03
08/16/23	Kara B. Hendricks	Follow-up with C. Spaulding regarding additional Eco battery review including documents in Box and provide direction for motion to release funds to JL2 investor group and provide direction for additional C. Madsen follow-up;	0.60	288.15
08/16/23	Akke Levin	Review spreadsheet of Beasley and Judd phone numbers for T-Mobile subpoena (.4); prepare list of phone numbers with limited time scope (.5); brief strategy re same with Kara Hendricks (.1); draft email to T-Mobile re same (.2); attention to email from T-Mobile re need for confirmation from objecting parties (.2); draft email re same to T-Mobile and counsel for Humphries and Rohner (.4)	1.80	841.50
08/16/23	Christian Spaulding	Meeting with S. Morrill and K. Hendricks regarding case updates, strategy, deadlines, and next steps.	0.40	127.50
08/16/23	Christian Spaulding	Evaluate corporate documents for Eco Battery, JL2 Investments, and related entities and individuals as it pertains to Eco Battery's receivership property.	1.70	541.87
08/18/23	Kara B. Hendricks	Attention to mail from J. Godsey with additional Eco Battery documents and follow-up with C. Spaulding regarding review;	0.10	48.03
08/18/23	Kara B. Hendricks	Attention to emails with AT&T regarding phone subpoena;	0.10	48.03
08/18/23	Akke Levin	Telephone call and conference with AT&T representative re status of subpoena and costs involved (.3); draft confirming email re same to AT&T (.2)	0.50	233.75
08/18/23	Steph Morrill	Evaluate, download, and prepare working set of the ECOBATTERY and ECOCAPITAL related records contained within Box, rec'd and uploaded by Allen Matkins and GT, and provide to C.Spaulding in preparation of review of same (1.4); Prepare index of ECO Capital records to aid C.Spaulding review, and provide in correspondence, with summary of the record sets provided, to K.Hendricks and C.Spaulding (.4);	1.80	315.00
08/18/23	Christian Spaulding	Communications with team regarding additional documents produced by Eco Battery and preliminary evaluation of the same.	0.50	159.37
08/18/23	Christian Spaulding	Continue draft of Motion to Approve interim distribution plan regarding funds recovered through Eco Battery.	5.90	1,880.62
08/21/23	Kara B. Hendricks	Attention to email from M. Cook with	1.10	528.28

		information regarding lawsuit brought against M. Murphy regarding J&J investment, review pleadings and follow-up with G. Winkler regarding same (.3); Prepare email to counsel for RPS regarding receivership stay and requesting confirmation that no action will be taken in state court proceeding (.7); Respond to email from RPS counsel regarding stay (.1);		
08/21/23	Kara B. Hendricks	Review J. Hall analysis regarding C. Madsen number comparison; Follow-up with C. Fronk regarding Madsen; Review emails and information from L. Maningo regarding D. Seybert and follow-up with G. Winkler regarding same;	0.30	144.08
08/21/23	Steph Morrill	Continue review of approx 210 unsigned purchase agreements contained in box hand-delivered by Chris Madsen, and prepare matrix of the information contained, in order to assess financial damages and investor information in full;	1.50	262.50
08/21/23	Steph Morrill	Evaluate, download, and prepare working set of the ECOBATTERY supplemental production ECOBATTERY 5946-5959 and provide to C.Spaulding in preparation of review of same;	0.50	87.50
08/21/23	Christian Spaulding	Communications with team regarding access to Box account (.2); review contents of folder pertaining to eco battery (2.2)	2.40	765.00
08/21/23	Christian Spaulding	Continue draft of Motion for Approval of Interim Distribution Plan as to Eco Battery.	2.20	701.25
08/22/23	Kara B. Hendricks	Request E. Escobar-Gaddi's assistance with pulling documents and information for upcoming hearing on motion to compel;	0.10	48.03
08/22/23	Kara B. Hendricks	Attention to email from A. Levin regarding AT&T subpoena response;	0.10	48.03
08/22/23	Kara B. Hendricks	Follow-up with C. Spaulding regarding SEC discovery responses and Eco Battery document review;	0.30	144.08
08/22/23	Christian Spaulding	Meeting with K. Hendricks and S. Morrill regarding recent changes in dispute with Eco Battery, Discovery and other related matters.	0.20	63.75
08/23/23	Kara B. Hendricks	Call with G. Winker regarding Seybert analysis and C. Madsen issues (.2); Review emails and correspondence regarding funds held by L. Maningo (.2); Call with G. Winkler and C. Fronk regarding Seybert funds and C. Madsen issues (.3); Respond to calls from L. Maningo and D. Chesnoff regarding Seybert and send follow-up email (.2); Call with D. Chesnoff (.1); Revise Seybert stipulation (.6);	1.60	768.40
08/23/23	Kara B. Hendricks	Review transcript from hearing on motion to compel (Grigsby and Paula) and follow-up with C. Spaulding regarding issues for	0.90	432.23

08/23/23	Akke Levin	upcoming hearing; Calls, messages and emails from William and Wendy Hanlon (subject of AT&T subpoena) re AT&T subpoena (.2); review subpoena, list of phone numbers and search records re same and telephone conferences with Hanlons re same (.4); email to Geoff Winkler re same (.1); revise subpoena list and draft email re same to AT&T (.2)	0.90	420.75
08/24/23	Kara B. Hendricks	Attention to emails relating to subpoena response from A. Levin; Respond to email from J. Kellogg regarding production;	0.10	48.03
08/24/23	Kara B. Hendricks	Attention to Seybert stipulation and make additional revisions and circulate to G. Winkler, L. Maningo and C. Fronk for review and comment;	0.60	288.15
08/24/23	Kara B. Hendricks	Telephone call with G. Winkler regarding Grigsby/Paula Beasley hearing;	0.20	96.05
08/24/23	Kara B. Hendricks	Review pleadings and prepare for hearing on motion to compel/motion for order to show cause;	1.40	672.35
08/24/23	Kara B. Hendricks	Follow-up regarding Eco Battery meeting with opposing counsel and discuss document review with C. Spaulding;	0.20	96.05
08/24/23	Kara B. Hendricks	Confer with G. Winkler, J. Hall, A. Priebe and J. delCastillo regarding case issues including status of forensic accounting, appeal, upcoming hearing, communication with defendants and asset recovery;	0.40	192.10
08/25/23	Kara B. Hendricks	Attention to email from J. Giardino with information regarding attorney fees and follow-up with G. Winkler regarding same; Prepare email to J. Giardino based on review of supplemental information to discuss additional asset turnover and Flavocure assignment;	0.80	384.20
08/25/23	Kara B. Hendricks	Finalize outline for hearing on motion to compel discovery from P. Beasley and A. Grigsby, confer with G. Winkler regarding same and participate in hearing;	3.20	1,536.80
08/25/23	Kara B. Hendricks	Respond to emails from L. Mangio regarding Seybert stipulation;	0.30	144.08
08/25/23	Christian Spaulding	Review filings and documents related to Motion to Compel Re: Paula Beasley and Aaron Grigsby in advance of hearing on the same.	1.30	414.37
08/25/23	Christian Spaulding	Work on responses to written discovery requests propounded by the SEC.	0.90	286.87
08/25/23	Christian Spaulding	Meeting with G. Winkler and team in advance of hearing on Motion to Compel or for Order to Show Cause why Paula Beasley and Aaron Grigsby should not be held in contempt.	1.50	478.12
08/27/23	Steph Morrill	Continue review of approx 286 unsigned purchase agreements contained in box hand-delivered by Chris Madsen, and prepare matrix of the information	2.80	490.00

08/28/23	Kara B. Hendricks	contained, in order to assess financial damages and investor information in full; Attention to emails from T-Mobile regarding subpoena and follow-up with A. Levin (.2); Respond to email from J. Kellogg regarding subpoenas and provide prior summaries regarding defendant numbers(.2); Review correspondence and production from Verizon and discuss download of information with E. Escobar-Gaddi and follow-up with G. Winkler (.8);	1.20	576.30
08/28/23	Kara B. Hendricks	Attention to emails forwarded by G. Winkler regarding claim transfers; Correspond with L. Maningo regarding revisions to Seybert stipulation and correspond with G. Winkler regarding same;	0.20	96.05
08/28/23	Akke Levin	Calls to and telephone conference with T-Mobile and AT&T re recent correspondence and status of productions in response to subpoenas (.4); report back re same to Kara Hendricks and discuss same (.2); skim Verizon production for scope of same (.4); review list of non-processed numbers and compare same to T-Mobile lists (.3); emails with Kara Hendricks re next steps (.2)	1.50	701.25
08/29/23	Kara B. Hendricks	Follow-up with A. Grigsby to confer regarding court order;	0.10	48.03
08/29/23	Kara B. Hendricks	Prepare status report regarding use of professional in receivership and incorporate J. delCastillo comments and send draft to G. Winkler for review;	1.80	864.45
08/29/23	Kara B. Hendricks	Call with G. Winkler to discuss investor assignment inquiry, plan for professionals and court submittal, D. Seybert request, updated numbers from forensic accounting team;	0.70	336.18
08/29/23	Kara B. Hendricks	Telephone call from R. Sacca regarding AT&T subpoena and request A. Levin follow-up;	0.20	96.05
08/29/23	Kara B. Hendricks	Review emails and documents from G. Winkler regarding Seybert investments (.3); Correspond with L. Maningo regarding information from forensic accounting team on Seybert transactions and request additional information (.2);	0.50	240.13
08/29/23	Kara B. Hendricks	Attention to correspondence from T. Elson regarding J. Jenne including documents provided, cross reference dates of court orders and follow-up with G. Winkler regarding concerns;	0.60	288.15
08/29/23	Akke Levin	Calls from, to, and with business owner re concern re subpoena; calls with AT&T and strategy emails with Kara Hendricks re possible middle solution.	0.80	374.00
08/29/23	Christian Spaulding	Evaluate documents produced by Eco	7.30	2,326.87

		Battery. Index and draft summary of the same.		
08/30/23	Kara B. Hendricks	Meet with C. Spaulding and S. Morrill to discuss Eco Battery document review, updated information regarding Seybert and C. Madsen, review of phone company records and Grigsby plan;	0.40	192.10
08/30/23	Kara B. Hendricks	Review appeal update from J. del Castillo; Attention to email from W. Lindsey regarding inquiry on Utah lis pendens and request J. McGraw follow-up;	0.10	48.03
08/30/23	Christian Spaulding	Meeting with S. Morrill and K. Hendricks regarding status of Eco Battery Negotiations, recent hearing on Motion to Compel Re: P. Beasley and A. Grigsby.	0.40	127.50
08/31/23	Kara B. Hendricks	Correspond with G. Winkler regarding Eco Battery and C. Madsen issues and follow-up with opposing counsel relating to same;	0.30	144.08
08/31/23	Kara B. Hendricks	Confer with G. Winkler regarding email from counsel for J. Jenne and Eco Battery issues;	0.20	96.05
08/31/23	Kara B. Hendricks	Participate in call with G. Winkler and J. delCastillo regard case status including forensic accounting, communication with defendants, status of appeal and upcoming filings;	0.30	144.08
08/31/23	Kara B. Hendricks	Follow-up with L. Maningo regarding D. Seybert stipulation and requested release of funds; Email T. Elson to schedule time to discuss Jenne concerns;	0.40	192.10
08/31/23	Christian Spaulding	Continue review and summary of eco battery documents	3.20	1,020.00
Total Hours:			90.60	
Total Amount:				\$ 33,706.80

TIMEKEEPER SUMMARY FOR TASK CODE GW001.

ASSET ANALYSIS AND RECOVERY

Summary of Fees (Standard Rates)

<u>Timekeeper Name</u>	<u>Hours Billed</u>	<u>Standard Rate</u>	<u>Total \$ Amount</u>
Kara B. Hendricks	30.20	610.00	18,422.00
Kyle Ewing	0.30	450.00	135.00
Christian Spaulding	41.40	395.00	16,353.00
Akke Levin	9.00	550.00	4,950.00
Steph Morrill	9.70	295.00	2,861.50
Totals:	90.60	471.54	\$ 42,721.50

Summary of Fees (Discounted Rates)

<u>Timekeeper Name</u>	<u>Hours Billed</u>	<u>Average Discounted Rate</u>	<u>Total \$ Amount</u>
Kara B. Hendricks	30.20	480.25	14,503.55
Kyle Ewing	0.30	340.00	102.00
Christian Spaulding	41.40	318.75	13,196.25
Akke Levin	9.00	467.50	4,207.50
Steph Morrill	9.70	175.00	1,697.50
Totals:	90.60	372.04	\$ 33,706.80

TASK CODE: GW004 CASE ADMINISTRATION

<u>DATE</u>	<u>TIMEKEEPER</u>	<u>DESCRIPTION</u>	<u>HOURS</u>	<u>AMOUNT</u>
08/07/23	Steph Morrill	Matter status check, with K.Hendricks;	0.30	52.50
08/08/23	Steph Morrill	Update Winkler pleadings and discovery chart in preparation of, and engage in, weekly team meeting and matter status check, with K.Hendricks and C.Spaulding;	0.60	105.00
08/11/23	Kara B. Hendricks	Correspond with J. Hall and D. Zaro regarding document storage issues and limited use of Relativity platform;	0.10	48.03
08/15/23	Steph Morrill	Update Winkler pleadings and discovery chart in preparation of weekly team meeting and matter status check, with K.Hendricks and C.Spaulding;	0.50	87.50
08/16/23	Steph Morrill	Update Winkler pleadings and discovery chart in preparation of, and engage in, weekly team meeting and matter status check, with K.Hendricks and C.Spaulding;	0.80	140.00
08/22/23	Steph Morrill	Update Winkler pleadings and discovery chart in preparation of weekly team meeting (5); Engage in, weekly team meeting and matter status check, with K.Hendricks and C.Spaulding (2);	0.70	122.50
Total Hours:			3.00	
Total Amount:				\$ 555.53

TIMEKEEPER SUMMARY FOR TASK CODE GW004,

CASE ADMINISTRATION

Summary of Fees (Standard Rates)

<u>Timekeeper Name</u>	<u>Hours Billed</u>	<u>Standard Rate</u>	<u>Total \$ Amount</u>
Kara B. Hendricks	0.10	610.00	61.00
Steph Morrill	2.90	295.00	855.50
Totals:	3.00	305.50	\$ 916.50

Summary of Fees (Discounted Rates)

<u>Timekeeper Name</u>	<u>Hours Billed</u>	<u>Average Discounted Rate</u>	<u>Total \$ Amount</u>
Kara B. Hendricks	0.10	480.30	48.03
Steph Morrill	2.90	175.00	507.50
Totals:	3.00	185.18	\$ 555.53

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

<u>Timekeeper</u>	<u>Hours</u>	<u>Rate</u>	<u>Amount</u>
Kara B. Hendricks	30.30	565.00	17,119.50
Kyle Ewing	0.30	400.00	120.00
Christian Spaulding	41.40	375.00	15,525.00
Akke Levin	9.00	550.00	4,950.00
Steph Morrill	12.60	295.00	3,717.00
	<hr/>	<hr/>	<hr/>
Totals:	93.60		\$ 41,431.50

Summary of Fees (Discounted Rates)

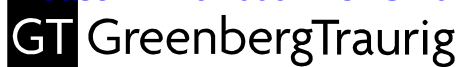
<u>Timekeeper</u>	<u>Hours</u>	<u>Rate</u>	<u>Amount</u>
Kara B. Hendricks	30.30	480.25	14,551.58
Kyle Ewing	0.30	340.00	102.00
Christian Spaulding	41.40	318.75	13,196.25
Akke Levin	9.00	467.50	4,207.50
Steph Morrill	12.60	175.00	2,205.00
	<hr/>	<hr/>	<hr/>
Totals:	93.60		\$ 34,262.33

Invoice No.: 1000458404
Re: SEC v. Beasley (Geoff Winkler, Receiver)
Matter No.: 209375.010100

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Description of Expenses Billed:

<u>DATE</u>	<u>DESCRIPTION</u>	<u>AMOUNT</u>
08/28/23	VENDOR: Nationwide Legal, LLC (4527) - ACH INVOICE#: 00000061439 DATE: 8/31/2023 STANDARD FILING (4 HRS) - UNITED STATES DISTRICT COURT DISTRICT OF NEVADA, 333 LAS VEGAS BLVD., SOUTH on 8/28/23 Req'd by/for Escobar-Gaddi, Evelyn	\$ 157.50
	Total Expenses:	<hr/> \$ 157.50



Invoice No. : 1000483927
File No. : 209375.010100
Bill Date : November 8, 2023

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

Attn: Geoff Winkler

INVOICE

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

Legal Services through October 31, 2023:

Total Fees:	\$	43,280.36
Current Invoice:	\$	<u>43,280.36</u>
Previous Balance (see attached statement):	\$	223,881.36
Total Amount Due:	\$	<u><u>267,161.72</u></u>

KBH:LC
Tax ID: 13-3613083



Invoice No.: 1000483927
File No.: 209375.010100

Important: If you receive a request to change the manner or location of your payment to Greenberg Traurig, please immediately contact Greenberg Traurig's accounting team at 305-418-6503. To assure that your payment is made and received correctly, please do not make any payment per the requested change until you verbally confirm with Greenberg Traurig that the change is legitimate.

REMITTANCE ADVICE

PLEASE RETURN WITH YOUR PAYMENT

Note: Payment is Due 30 Days from Date of Invoice

CLIENT NAME: WINKLER, GEOFF
FILE NUMBER: 209375.010100
INVOICE NUMBER: 1000483927*
BILLING PROFESSIONAL: Kara B. Hendricks

Current Invoice:	\$	43,280.36
Previous Balance:	\$	223,881.36
Total Amount Due:	\$	267,161.72

FOR YOUR CONVENIENCE, WIRE TRANSFER FUNDS TO:

For Wire Instructions:

Bank: WELLS FARGO BANK
ABA #: 121000248

For ACH Instructions:

Bank: WELLS FARGO BANK
ABA#: 063107513

CREDIT TO: GREENBERG TRAURIG DEPOSITORY ACCOUNT
ACCOUNT #: 2000014648663

PLEASE

REFERENCE: **CLIENT NAME:** WINKLER, GEOFF
FILE NUMBER: 209375.010100
INVOICE NUMBER: 1000483927*
BILLING
PROFESSIONAL: Kara B. Hendricks

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

Greenberg Traurig
PO Box 936769

KBH:LC

Tax ID: 13-3613083



Invoice No. : 1000483927
File No. : 209375.010100

ATLANTA GA 31193-6769

Wire fees may be assessed by your bank.

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

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

KBH:LC

Tax ID: 13-3613083



Invoice No. : 1000483927
 File No. : 209375.010100

Account Statement

<u>Date</u>	<u>Invoice #</u>	<u>Fees Due</u>	<u>Expenses Due</u>	<u>Other Due</u>	<u>Total Due</u>
07/19/22	1000035547	16,627.52	0.00	0.00	16,627.52
10/03/22	1000096060	12,029.69	0.00	0.00	12,029.69
11/09/22	1000142381	16,674.86	0.00	0.00	16,674.86
11/09/22	1000142507	8,666.16	0.00	0.00	8,666.16
02/14/23	1000224348	14,644.91	0.00	0.00	14,644.91
02/14/23	1000224438	12,682.94	0.00	0.00	12,682.94
02/14/23	1000224498	11,834.06	0.00	0.00	11,834.06
05/15/23	1000315147	6,912.96	0.00	0.00	6,912.96
05/15/23	1000315185	7,047.65	0.00	0.00	7,047.65
06/09/23	1000340006	7,584.77	0.00	0.00	7,584.77
08/14/23	1000395478	11,716.78	0.00	0.00	11,716.78
08/14/23	1000395520	6,298.65	0.00	0.00	6,298.65
08/24/23	1000400792	21,735.95	650.00	0.00	22,385.95
10/16/23	1000453632	34,339.63	15.00	0.00	34,354.63
10/17/23	1000458404	34,262.33	157.50	0.00	34,419.83
	Totals:	\$ 223,058.86	\$ 822.50	\$ 0.00	\$ 223,881.36

KBH:LC

Tax ID: 13-3613083

Description of Professional Services Rendered:

TASK CODE:

<u>DATE</u>	<u>TIMEKEEPER</u>	<u>DESCRIPTION</u>	<u>HOURS</u>	<u>AMOUNT</u>
10/13/23	Kara B. Hendricks	Call with S. Fronk and B. Wood to discuss whistle blower position and concerns and update G. Winkler;	0.50	240.13
			Total Hours:	0.50
			Total Amount:	\$ 240.13

TIMEKEEPER SUMMARY FOR TASK CODE,

Summary of Fees (Base Rates)

<u>Timekeeper Name</u>	<u>Hours Billed</u>	<u>Base Rate</u>	<u>Total \$ Amount</u>
Kara B. Hendricks	0.50	565.00	282.50
Totals:	0.50		\$ 282.50

Summary of Fees (Discounted Rates)

<u>Timekeeper Name</u>	<u>Hours Billed</u>	<u>Average Discounted Rate</u>	<u>Total \$ Amount</u>
Kara B. Hendricks	0.50	480.26	240.13
Totals:	0.50		\$ 240.13

TASK CODE: GW001 ASSET ANALYSIS AND RECOVERY

<u>DATE</u>	<u>TIMEKEEPER</u>	<u>DESCRIPTION</u>	<u>HOURS</u>	<u>AMOUNT</u>
10/01/23	Kara B. Hendricks	Prepare response to Kajioka letter re: Grigsby (1.6); Prepare notice relating to status of compliance with court order by Grigsby and P. Beasley (.6); Send draft of same to G. Winkler for review and comment (.1);	2.30	1,104.57
10/02/23	Kara B. Hendricks	Revise letter to A. Grigsby counsel to incorporate G. Winkler comments and update notice to be filed with court regarding compliance with court's directive;	1.00	480.25
10/02/23	Kara B. Hendricks	Attention to email from AT&T regarding subpoena response and work with S. Morrill on document download; Correspond with J. Rickard regarding Oberheiden subpoena production;	0.20	96.05
10/02/23	Kara B. Hendricks	Correspond with T. Elson regarding sale of Courtney Ridge house and J. Jenne issues;	0.10	48.02
10/02/23	Kara B. Hendricks	Attention to emails from AT&T regarding subpoena response and follow-up with team regarding documents.	0.10	48.02
10/02/23	Christian Spaulding	Begin draft of Motion to Find A. Grigsby in contempt.	3.80	1,211.25
10/02/23	Christian Spaulding	Evaluate prior proceedings, filings and transcripts for information pertinent to upcoming motion to find A. Grigsby in contempt.	5.30	1,689.37
10/03/23	Kara B. Hendricks	Correspond with D. O'Toole regarding R. Madsen trust documents and follow-up with W. Welch-Kirmse regarding lis pendens; Follow-up with J. Giardino regarding C. Madsen turnover status;	0.30	144.07
10/03/23	Kara B. Hendricks	Follow-up with C. Spaulding regarding Eco Battery information and Grigsby motion;	0.20	96.05
10/03/23	Christian Spaulding	Continue draft of Motion to Find A. Grigsby in contempt	5.90	1,880.62
10/03/23	Christian Spaulding	Research additional case law in support of motion to find A. Grigsby in contempt.	2.20	701.25
10/04/23	Kara B. Hendricks	Attention to email from L. Maningo regarding D. Seybert and follow-up regarding forensic accounting related issues; Correspond with G. Winkler regarding K. Dean payments and provide update on Grigsby motion; Follow-up regarding Jenne sale stipualtion;	0.40	192.10
10/04/23	Christian Spaulding	Continue and finalize draft of Motion to find A Grigsby in contempt.	6.90	2,199.37
10/04/23	Christian Spaulding	Begin draft of Motion for Turnover Re. A. Grigsby.	1.50	478.12
10/05/23	Kara B. Hendricks	Respond to G. Winkler email regarding	0.30	144.07

		Eco Battery; Respond to email from J. Giardino regarding C. Madsen resolution and telephone call regarding same; Correspond with G. Winkler regarding C. Madsen issues;		
10/05/23	Kara B. Hendricks	Correspond with P. Armeni regarding potential Paula Beasley representation;	0.20	96.05
10/05/23	Kara B. Hendricks	Discuss UCC research needed with K. Ray and provide background documents regarding C. Madsen vehicles;	0.30	144.07
10/05/23	Kara B. Hendricks	Review and revise motion for contempt relating to A. Grigsby and send to G. Winkler for comment;	1.70	816.42
10/05/23	Steph Morrill	Per request from Miriam Roberts of Palazzo Law Firm, resend document set responsive to SEC discovery requests;	0.20	35.00
10/05/23	Christian Spaulding	Evaluate additional authority in support of Motion for Turnover Re: A. Grigsby.	2.90	924.37
10/05/23	Christian Spaulding	Continue draft of Motion for turnover Re: A. Grigsby	8.50	2,709.46
10/06/23	Kara B. Hendricks	Attention to email from T. Elson and finalize stipulation for sale of Cortney Ridge property and update G. Winkler and J. McGraw regarding same;	0.30	144.07
10/06/23	Kara B. Hendricks	Call with G. Winkler, J. Hall, and J. McGraw regarding C. Madsen;	0.10	48.20
10/06/23	Kara B. Hendricks	Update Grigsby motion for contempt and incorporate G. Winkler comments and review supporting declaration (.6); Review and revise motion for turnover directed to Grigsby and provide G. Winkler draft of same for review (.3);	0.90	432.22
10/06/23	Kirche Ray	Evaluate Uniform Commercial Code and Nevada legal authority to determine how to perfect a security interest in a motor vehicle (2.9); email correspondence to K. Hendricks re: analysis for C. Madsen proposal (.3).	3.20	992.80
10/06/23	Christian Spaulding	Continue and finalize draft of Motion for Turnover re: A. Grigsby.	3.50	1,115.62
10/09/23	Kara B. Hendricks	Attention to correspondence and \$20 check from A. Grigsby and update G. Winkler;	0.10	48.02
10/09/23	Kara B. Hendricks	Prepare declaration in support of Grigsby motion for turnover and update motion and finalize same;	0.60	288.15
10/09/23	Kara B. Hendricks	Follow-up with J. Giardino regarding security interest, payment of fees and Flavocure requests relating to C. Madsen; Respond to email from T. Elson regarding Jenne issues;	0.30	144.07
10/09/23	Kirche Ray	Analyze correspondence from G. Winkler re: steps to acquire security interest in a motor vehicle.	0.10	31.03
10/09/23	Christian Spaulding	Continue analysis and summary of Eco Battery Documents as it relates to potential for claims.	3.90	1,243.12
10/11/23	Kara B. Hendricks	Return call with counsel considering	0.30	144.07

10/12/23	Kara B. Hendricks	representation of P. Beasley; Telephone call with J. Rickard regarding Oberheiden subpoena and follow-up with G. Winkler regarding same;	0.20	96.05
10/12/23	Kara B. Hendricks	Prepare litigation update from status report and correspond with A. Priebe regarding same;	0.70	336.17
10/13/23	Kara B. Hendricks	Email J. Giardino regarding lack of payment and response to prior email;	0.10	48.02
10/13/23	Kara B. Hendricks	Telephone call with G. Winkler to discuss pending matters including Jenne request, C. Madsen payment, P. Beasley issues and Eco Battery demand;	0.30	144.07
10/16/23	Kara B. Hendricks	Attention to emails from G. Winkler and J. Rickard regarding Oberheiden subpoena and email R. March regarding same; Respond to email from J. Giardino regarding C. Madsen;	0.20	96.05
10/16/23	Kara B. Hendricks	Review Eco Battery analysis and follow-up with C. Spaulding regarding IP and related issues;	0.80	384.20
10/16/23	Christian Spaulding	Evaluate Answering Brief in Shahabe and Young appeal.	0.30	95.62
10/17/23	Kara B. Hendricks	Discuss anticipated A. Grisby filings and reply briefs with C. Spaulding and follow-up regarding Eco Battery requests;	0.30	144.07
10/17/23	Kara B. Hendricks	Telephone call with J. Girardino regarding C. Madsen resolution (.2); Prepare email update for G. Winkler and team outlining proposal (.1); Correspond with G. Winkler regarding options to secure interest and reach resolution (.2); Follow-up with C. Spaulding regarding fees owed relating to motion (.1); Email J. Giardino to clarify issues raised (.2);	0.80	384.20
10/17/23	Steph Morrill	Conference with K.Hendricks, and C.Spaulding regarding matter, project status updates, and upcoming assignments and filings (.2); Update Winkler pleadings and discovery chart with details from team conference (.4);	0.60	105.00
10/17/23	Christian Spaulding	Gather and evaluate Eco Battery documents pertinent to S. Jager investment and subsequent communications.	4.60	1,466.25
10/17/23	Christian Spaulding	Meeting with S. Morrill regarding case updates, upcoming deadlines and case needs.	0.20	63.75
10/18/23	Kara B. Hendricks	Respond to email from G. Winkler regarding Eco Battery motion and proposed order;	0.10	48.02
10/18/23	Kara B. Hendricks	Attention to email from C. Fronk regarding stipulation for release of funds and follow-up with C. Spaulding regarding preparation of same (.1); Review C. Madsen account history and revise stipulation for release of Boulder Dam funds and circulate to counsel (1.2);	1.30	624.32

10/18/23	Kara B. Hendricks	Telephone call with J. Giradino regarding C. Madsen asset turnover and update G. Winkler;	0.30	144.07
10/18/23	Christian Spaulding	Review correspondence and draft Stipulation and Proposed Order for the Release of Funds from C. Madsen Boulder Dam Account.	1.50	478.12
10/18/23	Christian Spaulding	Confer with K. Hendricks regarding background of agreement with C. Madsen and response from Bank related to transfer of funds.	0.20	63.75
10/19/23	Kara B. Hendricks	Update K. Ewing regarding case issues and discuss Eco Battery complaint;	0.20	96.05
10/19/23	Kara B. Hendricks	Prepare notice of non-opposition to Eco Battery distribution motion and prepare two draft orders providing for alternative relief and work with E. Escobar-Gaddi to finalize and file same;	1.00	480.25
10/19/23	Kara B. Hendricks	Attention to email from J. Giardino with revised stipulation for C. Madsen transfer of funds and further comment and review regarding same (.4); Review exhibit to be included in security agreement regarding C. Madsen vehicles (.1); Prepare email to G. Winkler and J. McGraw outlining issues and items for further discussion (.4); Circulate updated draft stipulation to C. Fronk and J. Giardino (.1); Confer with J. McGraw regarding value of vehicles and concerns regarding proposed security agreement and car value (.4); Follow-up with J. Giardino to get VIN information for vehicles (.1);	1.50	720.37
10/19/23	Christian Spaulding	Evaluate documents related to C. Madsen security agreement.	0.30	95.62
10/20/23	Kara B. Hendricks	Review response from A. Grigsby to motion for contempt and provide guidance to C. Spaulding regarding reply brief;	0.30	144.07
10/20/23	Christian Spaulding	Evaluate Grigsby's Response to Motion for Contempt.	0.30	95.62
10/20/23	Christian Spaulding	Gather and review prior proceedings and transcripts for relevant citations in advance of drafting Reply in Support of Motion to find A. Grigsby in contempt.	3.80	1,211.25
10/20/23	Christian Spaulding	Begin draft of Reply in Support of Motion to Find A. Grigsby in Contempt.	2.10	669.37
10/23/23	Kyle Ewing	Conference/email communication with K. Hendricks re: potential depositions of FBI agents and Beasley and potential effect on estate interests	0.20	68.00
10/23/23	Kara B. Hendricks	Review Grigsby response to motion for turnover and follow-up with C. Spaulding regarding reply;	0.20	96.05
10/23/23	Kara B. Hendricks	Correspond with G. Winkler regarding hearing relating to C. Madsen motion(.1); Telephone call with J. Giardino regarding status of negotiations and upcoming	0.50	240.12

		hearing (.1); Review related emails (.1); Telephone call with G. Winkler regarding hearing and pending issues (.2)		
10/23/23	Kara B. Hendricks	Attention to email from C. Fronk and various defense counsel regarding depositions scheduled by counsel Judd (FBI agents and Beasley) and follow-up with K. Ewing regarding coverage of same;	0.20	96.05
10/23/23	Kara B. Hendricks	Discuss Eco Battery issues with G. Winkler and email L. Palazzo to schedule discussion with S. Jager regarding claims;	0.30	144.07
10/24/23	Kara B. Hendricks	Telephone call from G. Winkler regarding mediations and various case issues including defendant requests and upcoming depositions (.2); Send follow-up email with rule citation requested (.1);	0.30	144.07
10/24/23	Kara B. Hendricks	Prepare for and attend hearing regarding C. Madsen motion and update G. Winkler (1.4); Discuss case issues with J. Blum and send follow-up email with documents requested (.3);	1.70	816.42
10/24/23	Kara B. Hendricks	Review order relating to transfer of C. Madsen funds to the receiver and correspond with G. Winkler regarding same;	0.20	96.05
10/24/23	Kara B. Hendricks	Follow-up with L. Palazzo regarding Eco Battery issues and call with S. Jager;	0.20	96.05
10/25/23	Kara B. Hendricks	Follow-up with C. Spaulding regarding Grigsby reply briefs;	0.20	96.05
10/25/23	Kara B. Hendricks	Review emails and follow-up with counsel noticing depositions of Coder, Scott and Beasley and logistics associated with same; Review correspondence from defense counsel regarding depositions; Update G. Winkler regarding same;	0.80	384.20
10/25/23	Kara B. Hendricks	Continue Eco Battery evaluation and prepare for meeting with S. Jager to discuss initial investment background;	0.80	384.20
10/25/23	Steph Morrill	Conference with K.Hendricks, and C.Spaulding regarding matter, project status updates, and upcoming assignments and filings (.2);	0.20	35.00
10/25/23	Christian Spaulding	Draft Reply in Support of Motion to Find Aaron Grigsby in Contempt.	5.90	1,880.62
10/25/23	Christian Spaulding	Evaluate previous hearing transcripts and Grigsby's response to Motion to find Aaron Grigsby in Contempt.	2.10	669.37
10/25/23	Christian Spaulding	Evaluate relevant case law pertaining to payment of attorneys' fees on credit cards backed by receivership funds as it relates to reply in support of Grigsby motions.	1.40	446.25
10/26/23	Kara B. Hendricks	Telephone call with G. Winkler, L. Palazzo and S. Jager regarding Eco Battery background;	0.70	336.17
10/26/23	Kara B. Hendricks	Participate in team meeting with G. Winkler, J. Hall, A. Priebe, J. del Castillo and others regarding case status including	0.50	240.12

		forensic accounting, asset sales, communication with defendants, and case priorities;		
10/26/23	Kara B. Hendricks	Follow-up with C. Spaulding regarding Grigsby reply brief and review and revise same;	0.40	192.10
10/26/23	Kara B. Hendricks	Follow-up with J. Giardino regarding Madsen compliance with agreement;	0.20	96.05
10/26/23	Steph Morrill	Update Winkler pleadings and discovery chart with details from team conference;	0.40	70.00
10/26/23	Christian Spaulding	Continue and finalize draft of Reply in Support of Motion to find Aaron Grigsby in Contempt.	3.90	1,243.12
10/26/23	Christian Spaulding	Communications with team regarding draft of Reply in Support of Motion to Find Aaron Grigsby in Contempt.	0.30	95.62
10/26/23	Christian Spaulding	Communications with K. Hendricks regarding draft of Reply in Support of Motion to find Aaron Grigsby in contempt.	0.20	63.75
10/26/23	Christian Spaulding	Coordinate filing of Reply in Support of Motion to Find Aaron Grigsby in contempt.	0.20	63.75
10/26/23	Christian Spaulding	Email to G. Winkler regarding draft Reply in Support of Motion for Order Directing Turnover from Aaron Grigsby.	0.20	63.75
10/26/23	Christian Spaulding	Begin draft of Reply in Support of Motion for Order Directing Turnover from Aaron Grigsby.	2.40	765.00
10/26/23	Whitney Welch-Kirmse	Review Richard Madsen's trust documents to confirm beneficiary status re property subject to lis pendens.	0.30	127.50
10/27/23	Kara B. Hendricks	Review notice continuing FBI and Beasley depositions;	0.10	48.02
10/27/23	Kara B. Hendricks	Attention to email from G. Winkler regarding Grigsby reply and follow-up with C. Spaulding regarding finalizing same;	0.10	48.02
10/27/23	Kara B. Hendricks	Discuss P. Beasley request with G. Winkler and discussion regarding C. Madsen; Review declaration from P. Beasley and follow-up with G. Winkler regarding status report;	0.30	144.07
10/27/23	Kara B. Hendricks	Call with J. Hall and T. Elson regarding J. Jenne matters;	0.70	336.17
10/27/23	Christian Spaulding	Draft Reply in Support of Motion for Order Directing Turnover of Receivership Property from Aaron Grigsby.	6.90	2,199.37
10/27/23	Christian Spaulding	Review and finalize draft of Reply in Support of Motion to Find Aaron Grigsby in Contempt and communicate with team regarding the same.	0.40	127.50
10/30/23	Kara B. Hendricks	Prepare Second notice to file with the court regarding Paula Beasley and correspond with G. Winkler to finalize same;	0.60	288.15
10/30/23	Kara B. Hendricks	Revise reply in support of Grigsby motion for turnover and correspond with G. Winkler regarding same;	3.10	1,488.77
10/30/23	Kara B. Hendricks	Attention to email from S. Jager regarding Eco Battery communications; Attention to	0.30	144.07

10/30/23	Kara B. Hendricks	emails from T. Elson regarding J. Jenne tax filings (.1); Review updated lis pendens relating to R. Madsen property and forward to G. Winkler for review and signature (.2);	0.10	48.02
10/30/23	Kara B. Hendricks	Attention to email from J. Selik and follow-up with G. Winkler;		
10/30/23	Kara B. Hendricks	Telephone call with J. Giardino regarding finalize issues related to C. Madsen agreement;	0.20	96.05
10/30/23	Christian Spaulding	Evaluate draft and correspondence related to Declaration of Paula Beasley concerning compliance with Court's orders.	0.20	63.75
10/31/23	Kara B. Hendricks	Attention to emails from J. Giardino regarding C. Madsen issues and telephone call regarding same;	0.20	96.05
10/31/23	Kara B. Hendricks	Review and revise quarterly report and prepare notice of investors submittal (.7); Telephone calls with G. Winkler regarding same (.2);	0.90	432.22
10/31/23	Steph Morrill	Manage and evaluate records received from Shane Jager- videos and text threads;	1.30	227.50
10/31/23	Steph Morrill	Conference with K.Hendricks, and C.Spaulding regarding matter, project status updates, and upcoming assignments and filings (.2);	0.20	35.00
10/31/23	Christian Spaulding	Meeting with S. Morrill regarding case updates, upcoming deadlines and case needs.	0.20	63.75
Total Hours:			120.30	
Total Amount:				\$ 43,040.23

TIMEKEEPER SUMMARY FOR TASK CODE GW001,

ASSET ANALYSIS AND RECOVERY

Summary of Fees (Base Rates)

<u>Timekeeper Name</u>	<u>Hours Billed</u>	<u>Base Rate</u>	<u>Total \$ Amount</u>
Kara B. Hendricks	31.60	565.00	17,854.00
Kyle Ewing	0.20	400.00	80.00
Kirche Ray	3.30	365.00	1,204.50
Christian Spaulding	82.00	375.00	30,750.00
Whitney Welch-Kirmse	0.30	500.00	150.00
Steph Morrill	2.90	295.00	855.50
Totals:	120.30		\$ 50,894.00

Summary of Fees (Discounted Rates)

<u>Timekeeper Name</u>	<u>Hours Billed</u>	<u>Average Discounted Rate</u>	<u>Total \$ Amount</u>
Kara B. Hendricks	31.60	480.25	15,175.90
Kyle Ewing	0.20	340.00	68.00
Kirche Ray	3.30	310.25	1,023.83
Christian Spaulding	82.00	318.75	26,137.50
Whitney Welch-Kirmse	0.30	425.00	127.50
Steph Morrill	2.90	175.00	507.50
Totals:	120.30		\$ 43,040.23

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

<u>Timekeeper</u>	<u>Hours</u>	<u>Rate</u>	<u>Amount</u>
Kara B. Hendricks	32.10	565.00	18,136.50
Kyle Ewing	0.20	400.00	80.00
Kirche Ray	3.30	365.00	1,204.50
Christian Spaulding	82.00	375.00	30,750.00
Whitney Welch-Kirmse	0.30	500.00	150.00
Steph Morrill	2.90	295.00	855.50
	<hr/>	<hr/>	<hr/>
Totals:	120.80		\$ 51,176.50

Summary of Fees (Discounted Rates)

<u>Timekeeper</u>	<u>Hours</u>	<u>Rate</u>	<u>Amount</u>
Kara B. Hendricks	32.10	480.25	15,416.03
Kyle Ewing	0.20	340.00	68.00
Kirche Ray	3.30	310.25	1,023.83
Christian Spaulding	82.00	318.75	26,137.50
Whitney Welch-Kirmse	0.30	425.00	127.50
Steph Morrill	2.90	175.00	507.50
	<hr/>	<hr/>	<hr/>
Totals:	120.80		\$ 43,280.36

Invoice No.: 1000483927
Re: SEC v. Beasley (Geoff Winkler, Receiver)
Matter No.: 209375.010100

Page 12

Description of Expenses Billed:

<u>DATE</u>	<u>DESCRIPTION</u>	<u>AMOUNT</u>
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No expenses charged to this file



Invoice No. : 1000534223
File No. : 209375.010100
Bill Date : January 4, 2024

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

Attn: Geoff Winkler

INVOICE

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

Legal Services through December 31, 2023:

Total Fees: \$ 31,597.42

Expenses:

Local Travel 2.80

Total Expenses: \$ 2.80

Current Invoice: \$ 31,600.22

Previous Balance (see attached statement): \$ 212,165.30

Total Amount Due: \$ 243,765.52

KBH:LC
Tax ID: 13-3613083



Invoice No.: 1000534223
File No.: 209375.010100

Important: If you receive a request to change the manner or location of your payment to Greenberg Traurig, please immediately contact Greenberg Traurig's accounting team at 305-418-6503. To assure that your payment is made and received correctly, please do not make any payment per the requested change until you verbally confirm with Greenberg Traurig that the change is legitimate.

REMITTANCE ADVICE

PLEASE RETURN WITH YOUR PAYMENT

Note: Payment is Due 30 Days from Date of Invoice

CLIENT NAME: WINKLER, GEOFF
FILE NUMBER: 209375.010100
INVOICE NUMBER: 1000534223*
BILLING PROFESSIONAL: Kara B. Hendricks

Current Invoice:	\$	31,600.22
Previous Balance:	\$	212,165.30
Total Amount Due:	\$	243,765.52

FOR YOUR CONVENIENCE, WIRE TRANSFER FUNDS TO:

For Wire Instructions:

Bank: WELLS FARGO BANK
ABA #: 121000248

For ACH Instructions:

Bank: WELLS FARGO BANK
ABA#: 063107513

CREDIT TO: GREENBERG TRAUIG DEPOSITORY ACCOUNT
ACCOUNT #: 2000014648663

PLEASE

REFERENCE: **CLIENT NAME:** WINKLER, GEOFF
FILE NUMBER: 209375.010100
INVOICE NUMBER: 1000534223*
BILLING
PROFESSIONAL: Kara B. Hendricks

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

Greenberg Traurig
PO Box 936769

KBH:LC

Tax ID: 13-3613083



Invoice No. : 1000534223
File No. : 209375.010100

ATLANTA GA 31193-6769

Wire fees may be assessed by your bank.

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

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

KBH:LC

Tax ID: 13-3613083



Invoice No. : 1000534223
 File No. : 209375.010100

Account Statement

<u>Date</u>	<u>Invoice #</u>	<u>Fees Due</u>	<u>Expenses Due</u>	<u>Other Due</u>	<u>Total Due</u>
07/19/22	1000035547	16,627.52	0.00	0.00	16,627.52
10/03/22	1000096060	12,029.69	0.00	0.00	12,029.69
11/09/22	1000142381	16,674.86	0.00	0.00	16,674.86
11/09/22	1000142507	8,666.16	0.00	0.00	8,666.16
02/14/23	1000224348	14,644.91	0.00	0.00	14,644.91
02/14/23	1000224438	12,682.94	0.00	0.00	12,682.94
02/14/23	1000224498	11,834.06	0.00	0.00	11,834.06
05/15/23	1000315147	6,912.96	0.00	0.00	6,912.96
05/15/23	1000315185	7,047.65	0.00	0.00	7,047.65
06/09/23	1000340006	7,584.77	0.00	0.00	7,584.77
08/14/23	1000395478	11,716.78	0.00	0.00	11,716.78
08/14/23	1000395520	6,298.65	0.00	0.00	6,298.65
08/24/23	1000400792	4,347.19	0.00	0.00	4,347.19
10/16/23	1000453632	6,867.93	0.00	0.00	6,867.93
10/17/23	1000458404	8,836.19	0.00	0.00	8,836.19
11/08/23	1000483927	43,280.36	0.00	0.00	43,280.36
12/08/23	1000519107	16,101.68	11.00	0.00	16,112.68
	Totals:	\$ 212,154.30	\$ 11.00	\$ 0.00	\$ 212,165.30

KBH:LC

Tax ID: 13-3613083

Description of Professional Services Rendered:

TASK CODE: GW001 ASSET ANALYSIS AND RECOVERY

<u>DATE</u>	<u>TIMEKEEPER</u>	<u>DESCRIPTION</u>	<u>HOURS</u>	<u>AMOUNT</u>
12/01/23	Kara B. Hendricks	Follow-up with G. Winkler via email and phone regarding P. Beasley issues and Eco Capital Response (.2); Request C. Spaulding's assistance with Eco Capital response and revise same (.3); Follow-up with C. Spaulding on Eco Battery complaint (.2);	0.70	336.17
12/01/23	Christian Spaulding	Continue development of claims for Complaint against Eco Battery.	3.40	1,083.75
12/01/23	Christian Spaulding	Evaluate response from Counsel for ECO Capital and prepare response letter.	2.90	924.37
12/01/23	Christian Spaulding	Confer with K. Hendricks regarding Complaint against EcoBattery and related motion.	0.30	95.62
12/04/23	Kara B. Hendricks	Review and respond to email from R. Marsh regarding Oberheiden production;	0.10	48.02
12/04/23	Kara B. Hendricks	Attention to emails from J. del Castillo regarding 9th Circuit oral argument plan regarding intervenor appeal;	0.10	48.02
12/04/23	Steph Morrill	Resend Receiver's document production related to answer and responses to propounded discovery requests by SEC, to Patricia Zellner of Jackson White, per request;	0.20	35.00
12/04/23	Christian Spaulding	Begin draft of Motion to Pursue and Initiate litigation against Eco Battery.	2.80	892.50
12/05/23	Kara B. Hendricks	Return call with W. Urga regarding appeal and status check;	0.20	96.05
12/05/23	Kara B. Hendricks	Attention to email from J. Humphries with bank records;	0.10	48.02
12/05/23	Steph Morrill	Conference with K.Hendricks, and C.Spaulding regarding matter, project status updates, and upcoming assignments and filings (.2);	0.20	35.00
12/05/23	Christian Spaulding	Communications with team regarding status of P. Beasley compliance with court's orders.	0.20	63.75
12/05/23	Christian Spaulding	Locate current status of P. Beasley's payments of taxes on Schoofey property.	0.40	127.50
12/05/23	Christian Spaulding	Meeting with S. Morrill and K. Hendricks regarding status of case, upcoming deadlines and next steps.	0.20	63.75
12/05/23	Christian Spaulding	Continue draft of Motion to pursue and initiate litigation against Eco Battery.	2.70	860.62
12/06/23	Kara B. Hendricks	Respond to email from J. Giardino regarding C. Madsen issues and follow-up with J. McGraw regarding valuation of	0.20	96.05

		vehicles;		
12/07/23	Kara B. Hendricks	Attention to emails regarding value of C. Madsen assets from J. McGraw and G. Winkler; Respond to email from J. Giardino regarding subpoena and follow-up regarding collateral; Telephone call with J. McGraw regarding asset valuation; Send follow-up email to J. Giardino regarding same;	0.70	336.17
12/07/23	Kara B. Hendricks	Telephone call with G. Winkler regarding P. Beasley issues;	0.20	96.05
12/07/23	Kara B. Hendricks	Participate in team call with J. Hall, A. Preibe, M. Pham regarding case status including forensic accounting, asset recovery and sale efforts, and upcoming hearing;	0.50	240.12
12/07/23	Christian Spaulding	Communications with team regarding draft of Motion for Order Authorizing litigation against Eco Battery.	0.20	63.75
12/07/23	Christian Spaulding	Finalize draft of Motion to Pursue and Initiate litigation against Eco Battery.	3.90	1,243.12
12/07/23	Christian Spaulding	Finalize draft of Motion for Order Authorizing Litigation against Eco Battery.	3.50	1,115.62
12/07/23	Christian Spaulding	Communications with team regarding draft motion to pursue litigation against Eco Battery including additionally information gleaned in review.	0.20	63.75
12/08/23	Kara B. Hendricks	Attention to email from J. Giardino regarding bank subpoena and follow-up with J. Hall and M. Pham regarding same;	0.20	96.05
12/10/23	Kara B. Hendricks	Review and revise motion to pursue claims against Eco Battery/ Eco Capital and send draft of same to G. Winkler and C. Fronk;	0.90	432.22
12/11/23	Kara B. Hendricks	Begin preparation for upcoming hearing on motions to compel;	0.40	192.20
12/11/23	Kara B. Hendricks	Attention to email from C. Fronk and follow-up with G. Winkler regarding Eco Battery Motion and C. Madsen issues;	0.20	96.05
12/11/23	Christian Spaulding	Communications with counsel for SEC regarding Motion for Order Authorizing Litigation Against Eco Battery.	0.20	63.75
12/12/23	Kara B. Hendricks	Attention to email from G. Winkler regarding new Realtor and follow-up with C. Spaulding regarding motion to employ;	0.10	48.02
12/12/23	Kara B. Hendricks	Follow-up with C. Spaulding regarding Eco battery motion and correspond with E. Esocbar-Gaddi regarding finalizing same;	0.20	96.05
12/12/23	Kara B. Hendricks	Telephone call with G. Winkler and J. Giardino regarding pending C. Madsen issues (.4); Subsequent call from J. Giardino (.1); Follow-up with G. Winkler and send follow-up email (.3);	0.80	384.20
12/12/23	Christian Spaulding	Draft Motion for Order Authorizing the Employment of Real Estate Professionals - Zanganeh.	2.10	669.37
12/12/23	Christian Spaulding	Evaluate prior motions and orders related to sale of real property and review	1.80	573.75

		properties sold to date under the same.		
12/12/23	Christian Spaulding	Finalize and coordinate filing of Motion to Authorize Litigation against Eco Battery.	0.50	159.37
12/12/23	Christian Spaulding	Review correspondence between G. Winkler and Z. Zanganeh regarding sale of Paradise Valley Property.	0.30	95.62
12/13/23	Kyle Ewing	Begin preparing for tomorrow's evidentiary hearing re: A. Grigsby's contempt; conference with K. Hendricks and G. Winkler re: the same	0.40	136.00
12/13/23	Kara B. Hendricks	Work with G. Winkler to facilitate notarization of lis pendens for Utah property;	0.10	48.02
12/13/23	Kara B. Hendricks	Prepare status report regarding professionals and correspond with G. Winkler regarding same;	0.50	240.12
12/13/23	Kara B. Hendricks	Prepare for hearing on Grigsby motion to compel and status report (1.9); Attend and participate in hearing (1.7); Discuss next steps with G. Winkler (.6); Confer with K. Ewing regarding hearing and needs for rescheduled motion for turnover (.2); Request C. Spaulding assistance with Grigsby production review in preparation for hearing (.2);	4.60	2,209.15
12/13/23	Kara B. Hendricks	Respond to email from J. Giardino regarding C. Madsen motion;	0.10	48.02
12/13/23	Christian Spaulding	Evaluate record of payment of property taxes by P. Beasley and communicate with G. Winkler with respect outstanding amount and next due date.	0.30	95.62
12/13/23	Christian Spaulding	Communications with K. Hendricks following hearing on Motion to Compel and needs for continued hearing set for Thursday 12/14	0.20	63.75
12/13/23	Christian Spaulding	Begin gathering documents in advance of continued hearing on A. Grigsby Motion for Contempt.	0.90	286.87
12/13/23	Christian Spaulding	Communications with AFS regarding details of agreement with Z. Zanganeh for inclusion in Motion to Employ.	0.20	63.75
12/13/23	Christian Spaulding	Finalize draft of Motion to Employ Real Estate Professional and Related Declaration.	1.30	414.37
12/13/23	Christian Spaulding	Review status of communications with P. Beasley and information still needed related to issues raised in Motion to Compel.	1.30	414.37
12/13/23	Christian Spaulding	Continue draft of Complaint against Eco Battery.	2.80	892.50
12/14/23	Kyle Ewing	Plan and prepare for today's evidentiary hearing re: A. Grigsby's contempt of court with C. Spaulding, K. Hendricks, and G. Winkler; review briefs and documents discovered in connection with Grigsby's misconduct in connection with the same and prepare witness and argument outlines;	4.90	1,666.00

		prepare to cross examine Grigsby w/r/t receipts of cash and other funds		
12/14/23	Kyle Ewing	Attend hearing on receiver's motions for turnover and contempt against A. Grigsby and assist K. Hendricks with argument of the same and prepare for potential cross-examination of Mr. Grigsby	3.10	1,054.00
12/14/23	Kara B. Hendricks	Participate in Grigsby hearing and debrief with G. Winkler regarding next steps;	2.10	1,008.52
12/14/23	Kara B. Hendricks	Review and revise motion to employ new real estate professional and follow-up with G. Winkler and J. McGraw regarding same;	0.30	144.07
12/14/23	Kara B. Hendricks	Prepare outline for evidentiary hearing and matters for further review relating to same, review case law regarding requested relief and rule of professional responsibility potentially at issues;	3.60	1,728.90
12/14/23	Christian Spaulding	Attend hearing on Motion to Find Aaron Grigsby in Contempt	3.60	1,147.50
12/14/23	Christian Spaulding	Gather relevant documents and produce timeline for hearing of pertinent documents.	1.70	541.87
12/14/23	Christian Spaulding	Evaluate records produced by A. Grigsby as it relates to additional information presented by P. Beasley.	3.90	1,243.12
12/14/23	Christian Spaulding	Meeting with G. Winkler, K. Hendricks, and K. Ewing regarding first hearing on A. Grigsby Motion to Compel and upcoming hearing on same matter.	0.60	191.25
12/15/23	Kara B. Hendricks	Finalize motion to employ new real estate professional and prepare proposed order regarding same;	0.40	192.10
12/15/23	Kara B. Hendricks	Follow-up with C. Spaulding regarding preparation of Eco Battery complaint and provide update on court order allowing claims to proceed;	0.30	144.07
12/15/23	Kara B. Hendricks	Email D. Kajioka regarding Grigsby payment and provide wire instructions and opportunity to discuss;	0.20	96.05
12/15/23	Kara B. Hendricks	Request S. Morrill's assistance with Grigsby fee motion and update regarding hearing;	0.20	96.05
12/15/23	Steph Morrill	Procure Exhibit A and Exhibit B to Notice of Lis Pendens re Richard Madsen's Duck Creek Property;	0.50	87.50
12/15/23	Christian Spaulding	Communications with team regarding fees relate to A. Grigsby to be located for Motion for Attorneys Fees following contempt hearing.	0.40	127.50
12/15/23	Christian Spaulding	Communications with team regarding court ruling on Grigsby Contempt Proceeding including fees to be charged for noncompliance.	0.20	63.75
12/15/23	Christian Spaulding	Review course of dispute against A. Grigsby for pertinent dates related to Motion for Attorneys Fees.	0.30	95.62
12/18/23	Kara B. Hendricks	Attention to email and letter from D.	0.40	192.10

		Clukey regarding subpoenas relating to S. Johnson accounts and prepare response to same; Follow-up with G. Winkler and J. Hall regarding counsel request;		
12/18/23	Kara B. Hendricks	Review exhibit and follow-up regarding filing of Utah lis pendens;	0.20	96.05
12/18/23	Kara B. Hendricks	Follow-up with R. Marsh regarding Oberheiden production; Discuss document review with C. Spaulding;	0.10	48.02
12/18/23	Steph Morrill	Update Winkler pleadings and discovery chart with details from recently received correspondence and motion practice in matter;	1.90	332.50
12/18/23	Christian Spaulding	Communications with team regarding analysis of Oberheiden engagement agreements provided.	0.30	95.62
12/18/23	Christian Spaulding	Review engagement agreements provided by Oberheiden as compared to previously produced documents.	0.80	255.00
12/18/23	Christian Spaulding	Communications with team regarding engagement letters between J&J Consulting and Oberheiden.	0.20	63.75
12/18/23	Christian Spaulding	Communications with team regarding Oberheiden fee agreements for J&J Consulting.	0.20	63.75
12/18/23	Christian Spaulding	Evaluate engagement agreements for J&J Consulting provided by Oberheiden and compare with previously produced version.	0.50	159.37
12/19/23	Kara B. Hendricks	Follow-up with S. Morrill regarding Grigsby motion for fees based on court order;	0.10	48.02
12/19/23	Steph Morrill	Reach out to L.Carpenter for export of attorney fees for June 2022 - present, in advance of preparing motion for fees related to 12/14/23 hearing regarding Aaron Grigsby (.1); Review spreadsheet for inclusion of pertinent billing details and follow up with L.Carpenter regarding December 2023 (not yet billed) time and when to generate same (.2); Begin review of attorney fees to identify any which relate to Aaron Grigsby and Paula Beasley (.7);	1.00	175.00
12/20/23	Kara B. Hendricks	Attention to emails from C. Spaulding regarding Eco Battery analysis and follow-up with G. Winkler and J. Hall regarding new questions raised; Follow-up with S. Morrill regarding researching new entities identified;	0.40	192.10
12/21/23	Kara B. Hendricks	Participate in call with team including J. Winkler, A. Priebe, J. del Castillo and others regarding status of forensic accounting, communication with defendants, pending motions, etc.	0.30	144.07
12/21/23	Kara B. Hendricks	Review and respond to email from D. Kajioka regarding A. Grigsby and follow-up with G. Winkler regarding same;	0.10	48.02
12/21/23	Kara B. Hendricks	Attention to emails regarding Eco Battery	0.10	48.02

		research and assets;		
12/21/23	Christian Spaulding	Communications with team and opposing counsel regarding A. Grigsby, including response to Court order and Grigsby's malpractice insurance counsel.	0.20	63.85
12/22/23	Kara B. Hendricks	Correspond with R. Mash regarding Oberheiden production;	0.10	48.02
12/22/23	Christian Spaulding	Email communications with opposing counsel regarding Oberheiden documents.	0.20	63.75
12/22/23	Whitney Welch-Kirmse	Correspondence with escrow agent requesting recording of lis pendens.	0.20	85.00
12/26/23	Christian Spaulding	Evaluate deadlines and communicate with team regarding deadline to oppose motion to employ real estate professional.	0.20	63.75
12/27/23	Kara B. Hendricks	Follow-up with J. Giardino regarding lis pendens and moving forward on C. Madsen issues and review proposed document and follow-up regarding revisions needed (.2); Review Flavorcure document signed by C. Madsen (.1); Update G. Winkler and J. McGraw regarding C. Madsen issues (.1);	0.40	192.10
12/27/23	Kara B. Hendricks	Follow-up with C. Spaulding and S. Morrill regarding deadline for response to motion to employ and preparation of notice of non-opposition;	0.10	48.02
12/27/23	Christian Spaulding	Communications with team regarding response from R. Marsh.	0.20	63.75
12/28/23	Kara B. Hendricks	Confer with S. Morrill and C. Spaulding regarding Grigsby fee motion and information needed to complete same;	0.20	96.05
12/28/23	Kara B. Hendricks	Participate in call with G. Winkler, A. Priebe and others from AFS team, and M. Pham regarding case issues including document production and forensic accounting issues and asset recovery efforts;	0.40	192.10
12/28/23	Kara B. Hendricks	Discuss Eco Battery complaint with C. Spaulding and potential new parties;	0.20	96.05
12/28/23	Steph Morrill	Conference with K.Hendricks, and C.Spaulding regarding matter, project status updates, and upcoming assignments and filings (.1); Update Winkler pleadings and discovery chart with details from prior week filings and correspondence, and team conference (.5);	0.60	105.00
12/28/23	Steph Morrill	Continue review of billing entries from August 2022 through to current, to identify any entry related to Aaron Grigsby and his representation of Paula Grigsby, in preparation of motion for attorneys fees;	1.80	315.00
12/28/23	Christian Spaulding	Begin draft of Memorandum of Fees regarding proceedings against A. Grigsby.	1.90	605.62
12/28/23	Christian Spaulding	Meeting with S. Morrill and K. Hendricks regarding status of pending motions and next steps.	0.10	31.87
12/29/23	Steph Morrill	Continue review of billing entries from August 2022 through to current, to identify	6.20	1,085.00

12/31/23	Christian Spaulding	any entry related to Aaron Grigsby and his representation of Paula Grigsby, in preparation of motion for attorneys fees (5.9); provide billing spreadsheet to C. Spaulding for review (.3) Begin analysis of charges related to A. Grigsby.	2.30	733.12
			Total Hours:	92.50
			Total Amount:	\$ 31,309.27

TIMEKEEPER SUMMARY FOR TASK CODE GW001,

ASSET ANALYSIS AND RECOVERY

Summary of Fees (Standard Rates)

<u>Timekeeper Name</u>	<u>Hours Billed</u>	<u>Standard Rate</u>	<u>Total \$ Amount</u>
Kara B. Hendricks	21.10	610.00	12,871.00
Kyle Ewing	8.40	450.00	3,780.00
Christian Spaulding	50.40	395.00	19,908.00
Whitney Welch-Kirmse	0.20	500.00	100.00
Steph Morrill	12.40	295.00	3,658.00
Totals:	92.50	435.86	\$ 40,317.00

Summary of Fees (Discounted Rates)

<u>Timekeeper Name</u>	<u>Hours Billed</u>	<u>Average Discounted Rate</u>	<u>Total \$ Amount</u>
Kara B. Hendricks	21.10	480.25	10,133.27
Kyle Ewing	8.40	340.00	2,856.00
Christian Spaulding	50.40	318.75	16,065.00
Whitney Welch-Kirmse	0.20	425.00	85.00
Steph Morrill	12.40	175.00	2,170.00
Totals:	92.50	338.48	\$ 31,309.27

TASK CODE: GW004 CASE ADMINISTRATION

<u>DATE</u>	<u>TIMEKEEPER</u>	<u>DESCRIPTION</u>	<u>HOURS</u>	<u>AMOUNT</u>
12/07/23	Kara B. Hendricks	Attention to letter from D. Clukey and follow-up with G. Winkler regarding subpoena questions;	0.20	96.05
12/18/23	Kara B. Hendricks	Update report for investors and correspond with A. Priebe and G. Winkler regarding same;	0.40	192.10
			Total Hours:	0.60
			Total Amount:	\$ 288.15

TIMEKEEPER SUMMARY FOR TASK CODE GW004.

CASE ADMINISTRATION

Summary of Fees (Standard Rates)

<u>Timekeeper Name</u>	<u>Hours Billed</u>	<u>Standard Rate</u>	<u>Total \$ Amount</u>
Kara B. Hendricks	0.60	610.00	366.00
Totals:	0.60	610.00	\$ 366.00

Summary of Fees (Discounted Rates)

<u>Timekeeper Name</u>	<u>Hours Billed</u>	<u>Average Discounted Rate</u>	<u>Total \$ Amount</u>
Kara B. Hendricks	0.60	480.25	288.15
Totals:	0.60	480.25	\$ 288.15

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

<u>Timekeeper</u>	<u>Hours</u>	<u>Rate</u>	<u>Amount</u>
Kara B. Hendricks	21.70	565.00	12,260.50
Kyle Ewing	8.40	400.00	3,360.00
Christian Spaulding	50.40	375.00	18,900.00
Whitney Welch-Kirmse	0.20	500.00	100.00
Steph Morrill	12.40	295.00	3,658.00
	<hr/>	<hr/>	<hr/>
Totals:	93.10		\$ 38,278.50

Summary of Fees (Discounted Rates)

<u>Timekeeper</u>	<u>Hours</u>	<u>Rate</u>	<u>Amount</u>
Kara B. Hendricks	21.70	480.25	10,421.42
Kyle Ewing	8.40	340.00	2,856.00
Christian Spaulding	50.40	318.75	16,065.00
Whitney Welch-Kirmse	0.20	425.00	85.00
Steph Morrill	12.40	175.00	2,170.00
	<hr/>	<hr/>	<hr/>
Totals:	93.10		\$ 31,597.42

Invoice No.: 1000534223
Re: SEC v. Beasley (Geoff Winkler, Receiver)
Matter No.: 209375.010100

Page 11

Description of Expenses Billed:

<u>DATE</u>	<u>DESCRIPTION</u>	<u>AMOUNT</u>
12/14/23	VENDOR: Hendricks, Kara B. INVOICE#: 23815 DATE: 12/18/2023 Parking; 12/14/2023 PARKING FEE TO ATTEND DECEMBER 14, 2023 HEARING; Merchant: Las Vegas Court Parking	\$ 2.80
	Total Expenses:	<hr/> \$ 2.80

EXHIBIT 2

EXHIBIT 2

Declaration of Geoff Winkler

1 KARA B. HENDRICKS, ESQ.
 Nevada Bar No. 07743
 2 KYLE A. EWING, ESQ.
 Nevada Bar No. 014051
 3 CHRISTIAN T. SPAULDING, ESQ.
 Nevada Bar No. 014277
 4 **GREENBERG TRAUIG, LLP**
 10845 Griffith Peak Drive, Suite 600
 5 Las Vegas, Nevada 89135
 Telephone: (702) 792-3773
 6 Facsimile: (702) 792-9002
 7 Email: hendricksk@gtlaw.com
 ewingk@gtlaw.com
 8 spauldingc@gtlaw.com

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

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

14 SECURITIES AND EXCHANGE
 COMMISSION,

15 Plaintiff,

16 vs.

17 MATTHEW WADE BEASLEY; *et al.*,

18 Defendants,

19 THE JUDD IRREVOCABLE TRUST; *et al.*,

20 Relief Defendants.
 21

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

**DECLARATION OF GEOFF WINKLER
 IN SUPPORT MEMORANDUM OF
 FEES AND COSTS PURSUANT TO
 COURT ORDERS ON RECEIVER’S
 MOTION TO FIND AARON GRIGSBY
 IN CONTEMPT FOR FAILURE TO
 COMPLY WITH THIS COURT’S
 ORDERS (ECF No. 584) AND MOTION
 FOR ORDER DIRECTING THE
 TURNOVER OF RECEIVERSHIP
 PROPERTY FROM AARON GRIGSBY
 (ECF No. 585)**

22
 23 I, GEOFF WINKLER declare as follows:

24 1. I am over 21 years old and am a founding member and the chief executive officer of
 25 American Fiduciary Services LLC (“American Fiduciary Services” or “AFS”), which is based in
 26 Portland, Oregon

27 2. I make this declaration in support of the Receiver’s Memorandum of Fees and Costs
 28 Pursuant to Court Orders on Receiver’s Motion to Find Aaron Grigsby in Contempt for Failure to

1 Comply With This Court’s Orders (ECF No. 584) and Motion for Order Directing the Turnover of
2 Receivership Property From Aaron Grigsby (ECF No. 585) (the “Memorandum of Fees”).

3 3. This declaration is based on my personal knowledge, except where made on
4 information and belief, and as to those matters, I believe them to be true.

5 4. On June 3, 2022, the Court appointed me as the permanent receiver in *Securities and*
6 *Exchange Commission v. Matthew Wade Beasley, et al.*, Case No. 2:22-cv-00612-CDS-EJY,
7 pending in the U.S. District Court of the District of Nevada (the “Receivership Action”).

8 5. From June 2022 through January 2024, I and my firm, AFS devoted significant time
9 and effort toward working with Mr. Grigsby and Paula Beasley to recover Receivership assets.

10 6. The efforts in this respect included, among other things, communications and
11 meetings with Mr. Grigsby; analyzing and reviewing documents and information pertaining to the
12 assets in question; reviewing, strategizing and providing feedback on motions; and attending
13 hearings on each motion.

14 7. In total, AFS allocated 36.3 hours toward this matter which were billed in
15 accordance with the rates approved by this Court, for a total of \$11,998.00.

16 8. Additionally, AFS incurred \$5,240.16 in travel, lodging, and related expenses
17 related to my travel to Las Vegas for meetings with Mr. Grigsby and to attend the hearings on the
18 motions.

19 9. In total, I and AFS, incurred fees in the amount of \$11,998.00 and costs in the
20 amount of \$5,240.16.

21 10. The fees and costs incurred by AFS are detailed in the spreadsheet attached hereto
22 as **Exhibit A**. The back-up documentation for the aforementioned fees and expenses were
23 previously submitted to the Court with the Receiver’s quarterly fee applications.
24

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1 11. The fees and costs discussed herein were reasonable and necessarily incurred.

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

4 Executed on January 5, 2024.

5 */s/ Geoff Winkler*

6 _____
GEOFF WINKLER

7 Declarant
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EXHIBIT A

EXHIBIT A

Spreadsheet

E bit A
Re eiver s Fees

Date	Billor	Notes	Time	Rate	Total	Activity Code
8/3/2022	Geoff Winkler	Email with counsel KH re turnover of vehicle in possession of	0.1	340.00	34.00	Legal - Asset Analysis and Recovery
8/3/2022	Geoff Winkler	Update from counsel AG for third party PB, emails with counsel KH re timing, questions.	0.2	340.00	68.00	Legal - Case Administration
8/4/2022	Geoff Winkler	Review draft letter to AG, email to counsel KH with clarification.	0.1	340.00	34.00	Legal - Case Administration
8/8/2022	Geoff Winkler	Emails with AG re information on RV.	0.1	340.00	34.00	Legal - Asset Disposition
8/8/2022	Geoff Winkler	Review emails with counsel KH re foreclosure status, need for discussion with AG.	0.1	340.00	34.00	Legal - Case Administration
9/1/2022	Geoff Winkler	Emails with AG representing PB re access to Mount Charleston property.	0.1	340.00	34.00	Legal - Asset Analysis and Recovery
9/2/2022	Geoff Winkler	Emails with BT and AG re key pickup.	0.1	340.00	34.00	Legal - Asset Analysis and Recovery
9/9/2022	Geoff Winkler	Email to PB counsel AG re HOA invoices.	0.1	340.00	34.00	Legal - Case Administration
9/9/2022	Geoff Winkler	Review vehicle title issue and discuss with BT.	0.2	340.00	68.00	Legal - Case Administration
9/9/2022	Geoff Winkler	Discussion of security key with BT, emails with AG re security key code.	0.2	340.00	68.00	Legal - Asset Analysis and Recovery
9/15/2022	Geoff Winkler	Discuss titles needed with BT, available, process for obtaining titles for sale of vehicles.	0.3	340.00	102.00	Legal - Asset Analysis and Recovery
9/29/2022	Geoff Winkler	Emails with AG re PB HOA and insurance letters.	0.1	340.00	34.00	Legal - Case Administration
10/6/2022	Geoff Winkler	Email with counsel for MB and PB re title signoff.	0.1	340.00	34.00	Legal - Asset Analysis and Recovery
10/7/2022	Geoff Winkler	Call with BT re title endorsement, emails with AG re meeting, logistics.	0.3	340.00	102.00	Legal - Asset Disposition
10/11/2022	Geoff Winkler	Asset analysis of G Wagon and GT.	1.0	340.00	340.00	Legal - Asset Analysis and Recovery
10/11/2022	Geoff Winkler	Meeting with AG and PB to discuss assets and sign titles.	1.4	340.00	476.00	Legal - Asset Analysis and Recovery
10/17/2022	Geoff Winkler	Email to counsel KH and KE re meeting with AG.	0.1	340.00	34.00	Legal - Case Administration
11/11/2022	Geoff Winkler	Review motion for turnover, response by DOJ, SEC, review response to motion to compel PB and AG.	0.4	340.00	136.00	Legal - Case Administration
11/14/2022	Geoff Winkler	Review and edit reply in support of motion to compel PB and	0.2	340.00	68.00	Legal - Case Administration
11/18/2022	Geoff Winkler	Review list of vehicles with missing titles and work with parties to obtain missing titles.	0.2	340.00	68.00	Legal - Asset Analysis and Recovery
11/21/2022	Geoff Winkler	Emails to AG re: stipulation for Via Regina.	0.2	340.00	68.00	Legal - Asset Disposition
11/22/2022	Geoff Winkler	Review email from AG re stipulation signature, response to counsel KH.	0.1	340.00	34.00	Legal - Asset Disposition
11/28/2022	John Hall	Review Ruffian broker issue from GBW, and discuss with GBW.	0.3	310.00	93.00	Legal - Case Administration
11/28/2022	Geoff Winkler	Review email from AG re PB assistance with deeds, discussion with counsel KH re next steps.	0.2	340.00	68.00	Legal - Case Administration
11/29/2022	Geoff Winkler	Review tax memo and letter to AG, comments with counsel KE.	0.2	340.00	68.00	Financial - Tax Issues
12/5/2022	Geoff Winkler	Emails with AG re signature on deed for Via Regina Coeli.	0.1	340.00	34.00	Legal - Asset Disposition
12/7/2022	Geoff Winkler	Emails with AG and AMD re deed execution timing.	0.1	340.00	34.00	Legal - Asset Disposition
12/8/2022	John Hall	Review PB POA from 3/22	0.3	310.00	93.00	Legal - Case Administration
12/12/2022	Geoff Winkler	Review emails with AG, counsel KH, develop plan to work around issues.	0.1	340.00	34.00	Legal - Case Administration
12/14/2022	John Hall	Discussing update re: asset management with AMD.	0.1	310.00	31.00	Legal - Asset Analysis and Recovery
12/29/2022	John Hall	Review of PB hearing transcript per GBW request, discuss with GBW.	0.8	310.00	248.00	Legal - Case Administration
1/10/2023	Anna Priebe	Asset property tax management for each current property including assessor website, tax due dates, and pulling invoices.	1.6	230.00	368.00	Legal - Case Administration
2/10/2023	John Hall	Review memo from MCC and attachments on Grigsby. Discussion with GBW re: same.	0.4	310.00	124.00	Legal - Case Administration
2/10/2023	Geoff Winkler	Call with KM and AG to discuss asset turnover re MB assets.	0.5	340.00	170.00	Legal - Asset Analysis and Recovery
2/13/2023	John Hall	Review Grigsby doc index from MCC, discussion re: same with KAE and MBB.	0.4	310.00	124.00	Legal - Case Administration
3/2/2023	John Hall	Review and discuss KAE letter to AG, cross reference properties and entities against accounting records, discuss with GBW and MCC.	0.5	310.00	155.00	Legal - Asset Analysis and Recovery
3/3/2023	John Hall	Review and discuss AG memo and findings with MBB.	0.3	310.00	93.00	Financial - Accounting/Auditing
3/3/2023	Geoff Winkler	Communication with MBB re Grigsby documents.	0.2	340.00	68.00	Legal - Case Administration
3/3/2023	Geoff Winkler	Review petition re asset seized from MB home.	0.1	340.00	34.00	Legal - Asset Analysis and Recovery
3/23/2023	Geoff Winkler	Review request for extension to turnover documents from AG, discuss with counsel KH.	0.2	340.00	68.00	Legal - Case Administration
3/28/2023	John Hall	Review KAE request re: Grigsby, discuss completion with team.	0.3	310.00	93.00	Financial - Accounting/Auditing
3/28/2023	Geoff Winkler	Review documents provided by AG, notes to counsel KH and	0.3	340.00	102.00	Legal - Case Administration
3/30/2023	Geoff Winkler	Discuss account subpoena needs re AG documents with counsel	0.2	340.00	68.00	Legal - Case Administration
3/30/2023	Geoff Winkler	Email to MB counsel re meeting in two weeks.	0.1	340.00	34.00	Legal - Case Administration
5/2/2023	Geoff Winkler	Review document production from JPMC re PB and AG.	0.3	340.00	102.00	Legal - Case Administration
5/4/2023	Geoff Winkler	Review and edit reply in support of motion for OSC re PB and	0.2	340.00	68.00	Legal - Case Administration

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5/4/2023	Geoff Winkler	Review reply in support of motion for OSC re PB and AG, discuss with counsel.	0.3	340.00	102.00	Legal - Case Administration
5/9/2023	Geoff Winkler	Emails with JT and MH re MB and PB.	0.1	340.00	34.00	Legal - Case Administration
5/9/2023	Geoff Winkler	Call with counsel KH to discuss MB call.	0.3	340.00	102.00	Legal - Case Administration
5/9/2023	Geoff Winkler	Call with MH to discuss PB issues.	0.3	340.00	102.00	Legal - Case Administration
5/10/2023	Geoff Winkler	Review documents from PB re paychecks, employment.	0.2	340.00	68.00	Legal - Case Administration
5/10/2023	Geoff Winkler	Review PB transactions, paycheck deposits, review turnover records, prepare memo.	0.3	340.00	102.00	Legal - Asset Analysis and Recovery
5/11/2023	Geoff Winkler	Emails with MH re PB account, research BA turnover, plan to reimburse if necessary.	0.2	340.00	68.00	Legal - Asset Analysis and Recovery
5/15/2023	Geoff Winkler	Call with MH re PB bank account, email with counsel MP re account turnover, review bank statements, calculate paycheck, expenditures, email to MH, draft letter to PB.	0.4	340.00	136.00	Legal - Case Administration
5/16/2023	Geoff Winkler	Emails with MH re PB update and bank records assistance from	0.1	340.00	34.00	Legal - Case Administration
5/17/2023	Geoff Winkler	Emails with MH re PB account, counsel MP re account status.	0.1	340.00	34.00	Legal - Case Administration
5/18/2023	Geoff Winkler	Emails with MH re PB account.	0.1	340.00	34.00	Legal - Case Administration
5/22/2023	Geoff Winkler	Discussion with MH re PB assets, motion pending.	0.2	340.00	68.00	Legal - Asset Analysis and Recovery
5/24/2023	Geoff Winkler	Emails with MH re PB meeting, discussion.	0.1	340.00	34.00	Legal - Case Administration
5/31/2023	Geoff Winkler	Emails with MH re PB account turnover.	0.1	340.00	34.00	Legal - Case Administration
6/5/2023	Geoff Winkler	Call with counsel KH to discuss account turnover, refund of PB paycheck, defendant update to turnover asset, defendant response to discovery.	0.2	340.00	68.00	Legal - Case Administration
6/5/2023	Geoff Winkler	Call with counsel KH to discuss PB bank account, JJ turnover, review draft agreement.	0.5	340.00	170.00	Legal - Asset Analysis and Recovery
6/6/2023	Anna Priebe	Discussing storage agreements, verifying insurance on personal property, and asset turnover procedures with JPM.	0.6	230.00	138.00	Legal - Asset Analysis and Recovery
6/6/2023	Geoff Winkler	Process five accounts payable, draft letter to PB re refund of paycheck.	0.3	340.00	102.00	Financial - Accounting/Auditing
7/13/2023	Geoff Winkler	Review documents related to PB and AG motion to compel, prepare documents for delivery to FCI.	1.4	340.00	476.00	Legal - Case Administration
8/25/2023	Geoff Winkler	Attend hearing re turnover and OSC for PB and AG.	1.2	340.00	408.00	Financial - Litigation Consulting
8/29/2023	Geoff Winkler	Preparation for meeting with KH and AG.	0.1	340.00	34.00	Legal - Case Administration
8/30/2023	Geoff Winkler	Call with JPM re: asset turnover and results of the PB hearing.	0.1	340.00	34.00	Legal - Asset Analysis and Recovery
8/31/2023	Geoff Winkler	Work with AG to ensure keys and remotes are available, work with BT to arrange pickup.	0.2	340.00	68.00	Legal - Case Administration
9/19/2023	Geoff Winkler	Email communication from KH with GLG regarding PB & G items to be resolved.	0.1	340.00	34.00	Legal - Case Administration
9/22/2023	Geoff Winkler	Call with PB to discuss case status, representation, timing and next steps.	0.7	340.00	238.00	Legal - Case Administration
9/22/2023	Geoff Winkler	Call with KH to discuss call with PB.	0.4	340.00	136.00	Legal - Case Administration
9/25/2023	Geoff Winkler	Coordination of meeting with KH and counsel for AG.	0.1	340.00	34.00	Legal - Case Administration
9/27/2023	Geoff Winkler	Email communication with KH and CS regarding PB	0.2	340.00	68.00	Legal - Case Administration
9/27/2023	Geoff Winkler	Call with PB.	0.5	340.00	170.00	Legal - Case Administration
9/29/2023	Geoff Winkler	Email communication with KH and CS regarding AG Response to Outstanding Issues.	0.2	340.00	68.00	Legal - Case Administration
10/6/2023	Geoff Winkler	Communication with KH regarding AG motion.	0.2	340.00	68.00	Legal - Case Administration
10/9/2023	Geoff Winkler	Communication with KH regarding incoming check from AG.	0.1	340.00	34.00	Legal - Case Administration
10/9/2023	Geoff Winkler	Communication with KH regarding AG motion.	0.1	340.00	34.00	Legal - Case Administration
10/27/2023	Geoff Winkler	Call with MH, counsel for MB, to discuss deposition, declaration, PB hearing.	0.4	340.00	136.00	Legal - Case Administration
10/27/2023	Geoff Winkler	Follow call and email to MH re PB potential new counsel, extension, declaration needed.	0.2	340.00	68.00	Legal - Case Administration
10/27/2023	Geoff Winkler	Call to discuss PB extension request, CM asset turnover.	0.2	340.00	68.00	Legal - Case Administration
10/27/2023	Geoff Winkler	Call with MH to discuss MB and PB.	0.3	340.00	102.00	Legal - Case Administration
10/30/2023	Geoff Winkler	Review and edit notice for extension re PB, emails with counsel	0.2	340.00	68.00	Legal - Case Administration
10/30/2023	Geoff Winkler	Discussion with MH re PB Notice, email copy of filed Notice.	0.2	340.00	68.00	Legal - Case Administration
10/30/2023	Geoff Winkler	Review and edit Motion to Find AG in Contempt, emails with counsel, KH.	0.2	340.00	68.00	Legal - Case Administration
10/30/2023	Geoff Winkler	Email to PB re status of Notice and copy of filing.	0.1	340.00	34.00	Legal - Case Administration
11/6/2023	Geoff Winkler	Communication with KH and KE regarding property taxes for Schoofrey Street.	0.1	340.00	34.00	Legal - Case Administration
11/7/2023	Geoff Winkler	Communication with KH regarding property taxes on PB home.	0.1	340.00	34.00	Financial - Tax Issues
11/17/2023	Geoff Winkler	Communication with MH regarding attorney for PB.	0.1	340.00	34.00	Legal - Case Administration
11/20/2023	Geoff Winkler	Communication with KH regarding tax issue and communication with PB.	0.1	340.00	34.00	Financial - Tax Issues
11/20/2023	Geoff Winkler	Communication with KH regarding Third Notice re PB.	0.1	340.00	34.00	Legal - Case Administration

Exhibit A

Receivers Fees

12/10/2023	Geoff Winkler	Communication with PB regarding receipt for RR registration.	0.1	340.00	34.00	Legal - Case Administration
12/12/2023	Geoff Winkler	Call with PB to discuss upcoming hearing.	0.8	340.00	272.00	Legal - Case Administration
12/13/2023	Geoff Winkler	Communication with KH regarding property taxes for PB.	0.1	340.00	34.00	Legal - Asset Analysis and Recovery
12/13/2023	Geoff Winkler	Prepare (1.8) and attend hearing (1.1)	2.9	340.00	986.00	Legal - Case Administration
12/13/2023	Geoff Winkler	Prepare for additional hearing (1.7)	1.7	340.00	578.00	Legal - Case Administration
12/14/2023	Geoff Winkler	Meeting with KE, CS and KH to prepare for additional hearing	3.1	340.00	1,054.00	Legal - Case Administration
12/14/2023	Geoff Winkler	Attend AG OSC hearing	1.6	340.00	544.00	Legal - Case Administration
12/15/2023	Geoff Winkler	Communication with KH regarding AG wire instructions.	0.1	340.00	34.00	Legal - Case Administration
12/15/2023	Geoff Winkler	Communication with KH and KW regarding AG penalties and wire instructions.	0.1	340.00	34.00	Legal - Case Administration
Total			36.3		11,998.00	

Exhibit A

Receivers Expenses

Date	Billor	Category	Descriptor	Amount
8/24/2022	Winkler, Geoff	Marriott Hotel (2 nights)	Hotel	732.51
8/24/2022	Winkler, Geoff	Per Diem Meals	Meals	51.75
8/24/2022	Winkler, Geoff	Port of Portland Parking	Automotive Expense	96.00
12/5/2022	Winkler, Geoff	Airfare	Alaska Airlines - Airfare	500.01
12/15/2022	Winkler, Geoff	GoGo Internet	Miscellaneous	8.00
12/15/2022	Winkler, Geoff	Per Diem Meals	Meals	51.75
12/15/2022	Winkler, Geoff	Uber - Taxi	Automotive Expense	14.96
12/15/2022	Winkler, Geoff	Uber - Taxi	Automotive Expense	29.94
12/16/2022	Winkler, Geoff	Marriott Hotel (1 day)	Hotel	243.77
12/16/2022	Winkler, Geoff	Port of Portland Parking	Automotive Expense	54.00
12/16/2022	Winkler, Geoff	Uber - Taxi	Automotive Expense	15.91
12/16/2022	Winkler, Geoff	Uber - Taxi	Automotive Expense	20.00
12/16/2022	Winkler, Geoff	Uber - Taxi	Automotive Expense	26.45
8/15/2023	Winkler, Geoff	Airfare	Alaska Airlines - Airfare	396.79
8/24/2023	Winkler, Geoff	Per Diem Meals	Per Diem Meals	51.75
8/24/2023	Winkler, Geoff	Uber - Taxi	Automotive Expense	13.94
8/24/2023	Winkler, Geoff	Uber - Taxi	Automotive Expense	13.96
8/24/2023	Winkler, Geoff	Uber - Taxi	Automotive Expense	50.97
8/25/2023	Winkler, Geoff	Marriott Hotel (1 night)	Hotel	198.42
8/25/2023	Winkler, Geoff	Per Diem Meals	Per Diem Meals	51.75
8/25/2023	Winkler, Geoff	Port of Portland Parking	Automotive Expense	60.00
8/25/2023	Winkler, Geoff	Uber - Taxi	Automotive Expense	22.95
9/6/2023	Winkler, Geoff	Airfare	Alaska Airlines - Airfare	511.87
9/20/2023	Winkler, Geoff	Airfare	Alaska Airlines - Airfare	573.92
9/25/2023	Winkler, Geoff	Per Diem Meals	Per Diem Meals	51.75
9/25/2023	Winkler, Geoff	Port of Portland Parking	Automotive Expense	30.00
12/12/2023	Winkler, Geoff	Airfare	Alaska Airlines - Airfare	552.91
12/12/2023	Winkler, Geoff	Lyft - Taxi	Automotive Expense	29.64
12/12/2023	Winkler, Geoff	Per Diem Meals	Per Diem Meals	51.75
12/13/2023	Winkler, Geoff	City of Las Vegas - Parking	Automotive Expense	2.00
12/13/2023	Winkler, Geoff	Lyft - Taxi	Automotive Expense	14.23
12/13/2023	Winkler, Geoff	Lyft - Taxi	Automotive Expense	27.52
12/13/2023	Winkler, Geoff	Lyft - Taxi	Automotive Expense	29.42
12/13/2023	Winkler, Geoff	Per Diem Meals	Per Diem Meals	69.00
12/14/2023	Winkler, Geoff	Lyft - Taxi	Automotive Expense	36.93
12/14/2023	Winkler, Geoff	Lyft - Taxi	Automotive Expense	37.03
12/14/2023	Winkler, Geoff	Marriott Hotel (2 nights)	Hotel	464.86
12/14/2023	Winkler, Geoff	Per Diem Meals	Per Diem Meals	51.75
			Total	, 0.16