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

17 SECURITIES AND EXCHANGE
18 COMMISSION,

19 Plaintiff,

20 vs.

21 MATTHEW WADE BEASLEY, *et al.*,

22 Defendants,

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

24 Relief Defendants.
25

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

Judge Hon. Cristina D. Silva

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

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

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

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

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

17 **I. INTRODUCTION.**

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

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

4 This Application represents the seventh quarterly application for payment of fees and
 5 reimbursement of expenses submitted by Allen Matkins and SKR in accordance with
 6 Paragraph 62 of the Appointment Order, and covers fees and expenses incurred between
 7 October 1, 2023 and December 31, 2023 (the "Application Period").

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

<u>Applicant</u>	<u>Total Fees</u>	<u>Interim Payment Requested (Fees)</u>	<u>Expenses</u>	<u>Interim Payment Requested (Expenses)</u>
Allen Matkins	\$93,283.50	\$74,626.80	\$7,930.98	\$7,930.98
SKR	\$2,704.50	\$2,163.60	\$0.00	\$0.00
<u>TOTAL:</u>	\$95,988.00	\$76,790.40	\$7,930.98	\$7,930.98

19 In accordance with the commitment made to the Receiver by Allen Matkins and SKR in
 20 connection with their engagement in this matter, the fees identified above were billed at rates
 21 significantly discounted from Allen Matkins' and SKR's standard hourly rates, reflecting discounts
 22 in excess of 40% for certain timekeepers or submatters. In addition, consistent with the billing
 23 guidelines of the SEC, and Allen Matkins' and SKR's commitment in this federal receivership,
 24 Allen Matkins and SKR hereby request interim payment of only 80% of their respective fees, as
 25 noted above; the remaining, unpaid 20% "holdback" of Allen Matkins' and SKR's approved fees
 26 will be subject to final review and payment at the conclusion of the instant receivership.

1 **II. GENERAL SUMMARY.**

2 During the Application Period, and with assistance from Allen Matkins and SKR, the
3 Receiver made substantial progress on critical elements of Estate administration by, among other
4 things, securing the turnover of additional funds as authorized by the Appointment Order and
5 Amended Appointment Order, recovering Estate assets and subsequently monetizing certain of
6 those assets for the benefit of the Receivership Estate, attending to his filing obligations arising in
7 connection with pending litigation, including a pending appeal to the Ninth Circuit, further
8 developing his forensic accounting of the business and financial activities of the Receivership
9 Defendants, and regularly reporting on his progress to this Court.

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

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

26 Given the amount and significance of the work completed by Allen Matkins and SKR, and
27 the significant benefit of their efforts to the Estate, Allen Matkins and SKR respectfully submit –
28 as further detailed in the accompanying motion to approve the Application (filed under separate

1 cover in omnibus form) that the fees and expenses incurred during the Application Period are
2 reasonable and appropriate and should be approved and paid, on an interim basis, in the amounts
3 indicated above. Again, as an accommodation to the Estate, and consistent with the SEC's billing
4 guidelines and the ordinary practice in federal receiverships, Allen Matkins and SKR request that
5 the Court approve 100% of the fees and expenses incurred during the Application Period but
6 authorize payment, on an interim basis, of only 80% of such fees and 100% of such expenses, at
7 this time.

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

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

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

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

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

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

24 During the Application Period, Allen Matkins extensively assisted the Receiver in the
25 performance of his duties under the Appointment Order, primarily by attending to matters critical
26 to Receivership Estate administration, asset recovery and disposition, and pending and anticipated
27 litigation.
28

1 In all, on account of its services rendered to the Receiver during the Application Period,
 2 Allen Matkins billed 186.1 hours and \$93,283.50 in fees, and incurred \$7,930.98 in expenses,
 3 across the following categories¹:

<u>Category</u>	<u>Hours</u>	<u>Fees</u>	<u>Expenses</u>
General Receivership	29.9	\$15,825.50	\$7,930.98
Asset Recovery & Management	1.7	\$926.50	\$0.00
Investigation & Reporting	147.7	\$72,825.50	\$0.00
Sale, Disposition & Transfer of Assets	2.4	\$1,308.00	\$0.00
Third Party Claims & Recoveries	4.4	\$2,398.00	\$0.00
<u>TOTAL:</u>	186.1	\$93,283.50	\$7,930.98

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

16 As it has since the inception of this matter, Allen Matkins endeavored to staff each task
 17 efficiently, using a core team of attorneys, with specialized assistance as necessary. As the Court
 18 and interested parties may recall, Allen Matkins also agreed to a significant discount from its
 19 ordinary billing rates for this matter, as well as not to charge the Estate for any travel time
 20 associated with services provided to the Receiver. Accordingly, the fees identified below were
 21 billed at rates reflecting discounts of as much as 40%, resulting in substantial savings for the
 22 Estate.² In addition, and as noted above and further detailed in the Declarations submitted in
 23

24 ¹ A very limited number of Allen Matkins' entries reflect discussions between counsel. These
 25 entries include language referencing "advice to counsel", "confer with counsel", or similar
 26 discussions in connection with a particular issue. In accordance with applicable billing
 27 guidelines, such discussions have been kept to a minimum. Where they occur, Allen Matkins
 28 respectfully submits they are necessary and appropriate; on occasion, Allen Matkins attorneys
 will seek out the expertise of other personnel in the firm to avoid costly research or otherwise
 to expedite required work, in order to minimize the expense to the receivership.

² Indeed, had Allen Matkins billed at its standard rates, its fees for the Application Period would
 be tens of thousands of dollars more than the amount requested in the Application. In

1 support of this Application, Allen Matkins' fee and expense records were transmitted to the SEC
2 for review on a monthly basis, and have drawn no objection.

3 **1. General Receivership.**

4 During the Application period, Allen Matkins attorneys billed 29.9 hours to the "General
5 Receivership" work category, largely in connection with matters relating to the Receiver's
6 administration of the Estate or attending to administrative matters arising from the Receiver's
7 obligations under the Appointment Order. Allen Matkins incurred \$7,930.98 in general expenses,
8 consisting almost entirely of: (1) monthly fees for electronic document hosting and management
9 services; and (2) costs associated with the service of subpoenas upon financial institutions in
10 connection with the Receiver's ongoing investigation and forensic accounting. Allen Matkins
11 personnel billed the following time and fees during the Application Period:

<u>Timekeeper</u>	<u>Position</u>	<u>Hourly Rate</u>	<u>Hours</u>	<u>Fees</u>
David Zaro	Partner	\$545	1.9	\$1,035.50
Joshua del Castillo	Partner	\$545	23.3	\$12,698.50
Matthew Pham	Associate	\$445	1.8	\$801.00
James Robichaud	Associate	\$445	2.9	\$1,290.50
<u>TOTAL:</u>			29.9	\$15,825.50

18
19 Work performed in this category generally related to critical case and Estate administration
20 matters. During the Application Period, Allen Matkins personnel: (1) attended to outstanding
21 case administration tasks; (2) with the Receiver and co-counsel, developed strategic plans for the
22 administration of the Estate; (3) attended to issues arising in connection with a pending Ninth
23 Circuit appeal filed by prospective intervenors in the above-entitled action, and engaged in
24 necessary legal analysis and briefing in connection therewith; (4) monitored the relevant dockets
25 in connection with pending litigation; and (5) prepared for and attended meetings of counsel and
26 Court hearings. As a result of these efforts, the Receiver has streamlined his case and Estate

27
28 addition, and over and above the savings to the Estate realized from rate discounts, Allen
Matkins has written off thousands of dollars in time entries, in accordance with its
commitment to minimizing the Estate's expenses.

1 administration strategy, appropriately responded to numerous pleadings that directly implicated
 2 the viability of the Court's receivership, and continued to pursue his obligations to the Court and
 3 interested parties.

4 **2. Asset Recovery & Management.**

5 During the Application period, Allen Matkins attorneys billed 1.7 hours to the "Asset
 6 Recovery & Management" work category. Allen Matkins personnel billed the following time and
 7 fees during the Application Period:

<u>Timekeeper</u>	<u>Position</u>	<u>Hourly Rate</u>	<u>Hours</u>	<u>Fees</u>
David Zaro	Partner	\$545	0.6	\$327.00
Joshua del Castillo	Partner	\$545	1.1	\$599.50
<u>TOTAL:</u>			1.7	\$926.50

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 13 The limited time expended in this category related to the Receiver's efforts to recover from
 14 third parties assets subject to the turnover provisions of the Appointment Order and Amended
 15 Appointment Order, which require all third parties in possession of assets of the Receivership
 16 Defendants to turn such assets over to the Receiver. During the Application Period, Allen Matkins
 17 attorneys: (1) conferred with the Receiver and co-counsel on the status of a prospective
 18 disgorgement action and discussed discovery issues arising in connection therewith; (2) reviewed
 19 documents in connection with a title inquiry and advised the Receiver accordingly; and
 20 (3) monitored the appropriate dockets and reviewed filings relating to the Receiver's asset
 21 recovery efforts.

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

25 **3. Investigation and Reporting.**

26 During the Application period, Allen Matkins attorneys billed 147.7 hours to the
 27 "Investigation & Reporting" work category. Allen Matkins personnel billed the following time
 28 and fees during the Application Period:

<u>Timekeeper</u>	<u>Position</u>	<u>Hourly Rate</u>	<u>Hours</u>	<u>Fees</u>
David Zaro	Partner	\$545	11.8	\$6,431.00
Joshua del Castillo	Partner	\$545	64.7	\$35,261.50
Matthew Pham	Associate	\$445	50.0	\$22,250.00
James Robichaud	Associate	\$445	15.4	\$6,853.00
Simona Peng	Paralegal	\$350	0.9	\$315.00
Ross Neglia	Paralegal	\$350	4.9	\$1,715.00
<u>TOTAL:</u>			147.7	\$72,825.50

During the Application Period, the Receiver and his personnel redoubled their efforts to complete a preliminary forensic accounting of the business and financial activities of the Receivership Defendants and their affiliates, in accordance with Paragraph 7(A) of the Appointment Order, and consistent with a scheduling order entered in the related matter captioned as *In re J&J Investment Litigation* and bearing Case No. 2:22-cv-00529-GMN-NJK, also pending before the this Court (the "Wells Fargo Case"), which order contemplated the completion of an initial forensic accounting in January 2024. Accordingly, during the Application Period, and at the Receiver's request, Allen Matkins engaged in extensive and voluminous additional efforts to obtain additional documents relevant to the Receiver's ongoing efforts. Allen Matkins and the Receiver's accounting team communicated extensively during this period, in connection with dozens of new and outstanding discovery requests and subpoenas, and with respect to the Receiver's follow-up with producing parties when initial productions were incomplete or required supplementation. In all, Allen Matkins' document recovery efforts resulted in the production of tens of thousands of additional pages of material to the Receiver, including documents critical to the Receiver's forensic accounting in both this action and the Wells Fargo Case.

During the Application Period, and among other things, Allen Matkins attorneys:

- (1) prepared and served dozens of subpoenas and document requests on financial institutions believed to be in possession of relevant records;
- (2) corresponded extensively with counsel for

1 such financial institutions concerning the scope of the subpoenas at issue, and the institutions'
 2 subsequent productions; (3) drafted subpoena follow-up letters identifying responsive documents
 3 omitted from an initial document production and requesting the supplemental production of such
 4 documents; (4) coordinated with the Receiver's staff to manage and administer documents
 5 produced directly to Allen Matkins; (5) corresponded extensively with the Receiver's accounting
 6 team with respect to the above-described document production efforts; and (6) assisted with the
 7 satisfaction of the Receiver's reporting obligations to the Court.

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

9 During the Application period, Allen Matkins attorneys billed 2.4 hours to the "Sale,
 10 Disposition & Transfer of Assets" work category.

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

<u>Timekeeper</u>	<u>Position</u>	<u>Hourly Rate</u>	<u>Hours</u>	<u>Fees</u>
Joshua del Castillo	Partner	\$545	2.4	\$1,308.00
<u>TOTAL:</u>			2.4	\$1,308.00

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 15
 16 Work performed in this category related to the Receiver's ongoing and successful asset
 17 disposition efforts, including with respect to some of the Estate's most valuable personal and real
 18 property. During the Application Period, Allen Matkins attorneys: (1) reviewed title and other
 19 documents related to the Receiver's anticipated sale of Estate equity interests and advised the
 20 Receiver accordingly; and (2) prepared and revised documents necessary to the completion of
 21 such sale.

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

23 During the Application period, Allen Matkins attorneys billed 4.4 hours to the "Third Party
 24 Claims & Recoveries" work category.

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

<u>Timekeeper</u>	<u>Position</u>	<u>Hourly Rate</u>	<u>Hours</u>	<u>Fees</u>
Joshua del Castillo	Partner	\$545	4.4	\$2,398.00
<u>TOTAL:</u>			4.4	\$2,398.00

1
2 Work performed in this category related to the Receiver's ongoing examination and
3 evaluation of potential claims against third parties and actionable conduct appearing to implicate
4 the interests of the Estate. During the Application Period, Allen Matkins attorneys: (1) prepared a
5 legal analysis addressing questions of jurisdiction and standing in connection with a prospective
6 claim against a third party; and (2) reviewed materials relating to such claim.

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

8 During the Application Period, SKR provided critical local counsel support to the
9 Receiver, including in connection with the preparation, finalization, and filing of key documents in
10 the above-entitled action. SKR expended a substantial portion of its time during the Application
11 Period in connection with the Receiver's discovery efforts relating to ongoing litigation efforts
12 against several third parties. Pursuant to such discovery efforts, SKR attorneys and staff: (1) met
13 and conferred with subpoena respondents to facilitate the production of responsive documents;
14 (2) corresponded with opposing counsel in the Wells Fargo Case in connection with the
15 preparation of a joint discovery plan and case scheduling matters; (3) prepared and filed several
16 discovery related motions in connection with pending litigation, including motions to compel and
17 motions for sanctions; and (4) attended discovery-related hearings.

18 In addition, SKR attorneys and staff generally assisted the Receiver and Allen Matkins, as
19 necessary, with the preparation and filing of pleadings in the above-entitled action. A complete
20 description of the services rendered by SKR can be found in the invoices collectively appended
21 hereto as **Exhibit 2**.

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

<u>Month</u>	<u>Total Fees Billed</u>
October 2023	\$802.00
November 2023	\$771.50
December 2023	\$1,131.00
<u>TOTAL:</u>	<u>\$2,704.50</u>

1 **IV. THE FEES AND EXPENSES INCURRED ARE REASONABLE AND SHOULD BE**
2 **ALLOWED.**

3 Allen Matkins and SKR respectfully submit that the fees and expenses incurred during the
4 Application Period were fair, reasonable, and necessary, and that the associated services provided
5 were of significant benefit to the Estate. Specifically, and as reflected in **Exhibits 1** and **2**, Allen
6 Matkins and SKR have endeavored to staff this matter appropriately and have billed their time at
7 substantially discounted rates. Additionally, Allen Matkins and SKR have steadfastly attempted
8 to avoid duplication of effort by, among other things, coordinating with the Receiver and co-
9 counsel to allocate tasks and responsibilities and participating in regular discussions regarding
10 work in progress to minimize the likelihood of duplication.

11 As reflected in the Receiver's prior submissions to this Court, Allen Matkins and SKR are
12 providing an extremely high quality of work in a matter involving dozens of relevant parties and
13 hundreds of millions of dollars in assets. Their efforts are bearing fruit: the Receiver has
14 recovered more than \$80 million in personal and real property assets. He has consistently
15 succeeded in securing necessary and appropriate relief from the Court, the turnover of cash and
16 other assets, and the sales of personal and real property. Put simply, in a highly complex
17 receivership, and while the Receiver continues to develop a comprehensive knowledge and
18 understanding the underlying facts, critical players, and assets, the Receiver – with the help of
19 Allen Matkins and SKR – is recovering millions of dollars in cash, obtaining the turnover of
20 millions of dollars in personal and real property, and has already secured Court approval of and
21 successfully undertaken procedures aimed at monetizing those assets in a manner intended to
22 maximize the recovery for the benefit of the Estate and creditors, including investors. The fees
23 and expenses incurred by Allen Matkins and SKR during the Application Period are minimal
24 when compared to these results³, and Allen Matkins and SKR respectfully request that the Court
25 approve 100% of their fees and expenses, and also authorize the payment of those fees and
26 expenses on a percentage, interim basis, as requested herein.

27
28 ³ Indeed, the less than \$100,000.00 requested in this application reflects approximately one tenth
of one percent of the approximately \$80 million in assets already recovered by the Receiver.

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

4 **V. CONCLUSION.**

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

- 7 1. Granting this Application in its entirety;
- 8 2. Approving Allen Matkins' fees and expenses incurred during the Application
9 Period, in the respective amounts of \$93,283.50 and \$7,930.98;
- 10 3. Authorizing the Receiver to pay Allen Matkins, on an interim basis, 80% of its
11 approved fees incurred during the Application Period, in the amount of \$74,626.80 and 100% of
12 its approved expenses incurred during the Application Period, in the amount of \$7,930.98 from the
13 funds of the Receivership Estate;
- 14 4. Approving SKR's fees and expenses incurred during the Application Period, in the
15 respective amounts of \$2,704.50 and \$0.00; and
- 16 5. Authorizing the Receiver to pay SKR, on an interim basis, 80% of its approved fees
17 incurred during the Application Period, in the amount of \$2,163.60 and 100% of its approved
18 expenses incurred during the Application Period, in the amount of \$0.00; and
- 19 6. Providing such other and further relief as the Court deems just and proper.

20 Dated: February 13, 2024

SEMENZA KIRCHER RICKARD

/s/ Jarrod L. Rickard

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865 South Figueroa Street, Suite 2800
Los Angeles, California 90017-2543

Attorneys for Receiver Geoff Winkler

CERTIFICATE OF SERVICE

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

On the 13th day of February, 2024, I served the document(s), described as:

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

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

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

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

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10 Vincent J. Aiello vaiello@spencerfane.com, jramirez@spencerfane.com,
11 lwilliams@spencerfane.com

12 Louis Martin Bubala, III lbubala@kcnvlaw.com, cdrossler@kcnvlaw.com,
13 kmilks@kcnvlaw.com

14 Jonathan D. Blum jblum@wileypetersenlaw.com, cdugenia@wileypetersenlaw.com,
15 cpascal@wileypetersenlaw.com

16 Charles La Bella charles.labela@usdoj.gov, maria.nunez-simental@usdoj.gov

17 Molly M White mwhite@mcguirewoods.com, shicks@mcguirewoods.com

18 Samuel A Schwartz saschwartz@nvfirm.com, ecf@nvfirm.com

19 Jason Hicks jason.hicks@gtlaw.com, escobargaddie@gtlaw.com,
20 geoff@americanfiduciaryservices.com, jason-hicks-7754@ecf.pacerpro.com,
21 rosehilla@gtlaw.com

22 Timothy C. Pittsenbarger chase@lcpfirm.com

23 Kyle A. Ewing ewingk@gtlaw.com, flintza@gtlaw.com, kyle-ewing-7297@ecf.pacerpro.com,
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26 crawforda@ballardspahr.com, lvdocket@ballardspahr.com

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28 jeheilich@hollandhart.com

Keely Perdue Chippoletti keely@christiansenlaw.com, lit@christiansenlaw.com

Casey R. Fronk FronkC@sec.gov, #slro-docket@sec.gov

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Joseph G. Went jgwent@hollandhart.com, Intaketeam@hollandhart.com,
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Michael E. Welsh welshmi@sec.gov

John Giardino jgiardino@pryorcashman.com

David Baddley baddleyd@sec.gov

Kamille Dean Kamille@kamilledean.com

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

c. **BY PERSONAL SERVICE.**

d. **BY DIRECT EMAIL.**

///

1 e. **BY FACSIMILE TRANSMISSION.**

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

3
4 */s/ Olivia A. Kelly*
5 _____
6 An Employee of Semenza Kircher Rickard
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EXHIBIT 1

EXHIBIT 1

02/13/24 11:04:15 PROFORMA STATEMENT FOR MATTER 392775.00002 (Winkler, Geoff - Receiver for J&J Consul) (General Receivership)

Preliminary Billing FormBilling Atty: 001842 - Del Castillo,
Joshua

Matter #: 392775.00002

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

Date of Last Billing: 12/26/23

Matter Name: General Receivership

Proforma Number: 1257810

Client/Matter Joint Group # 392775.1

Client Matter Number:

Fees for Matter 392775.00002.(General Receivership)

Trans Date	Index	Description of Service Rendered	Timekeeper	Hours	Fees	Sum	Circle	Action		
10/02/23	9364694	Revise SEC appellate supplemental excerpts of record (0.6); emails and teleconferenec with J. Robichaud regarding insertion of citations into appellate opening brief (0.5).	Del Castillo, Joshua	1.10	599.50	599.50	WO	HD	TR	_____
10/04/23	9366932	Revisions to the Receiver's answering brief to Shahabe's appeal of denial of motion to intervene (2.2); discuss same with J. del Castillo (.2).	Robichaud, James	2.40	1,068.00	1,667.50	WO	HD	TR	_____
10/04/23	9368234	Confer with J. Robichaud regarding revised citations to Receiver's (intervenor) appellate brief and review same (1.0); complete additional substantive revisions and additions to brief and transmit for formatting (2.6); confer with D. Zaro regarding pending case and estate adminitration matters (0.2).	Del Castillo, Joshua	3.80	2,071.00	3,738.50	WO	HD	TR	_____
10/05/23	9368233	Complete additional revisions to appellate (intervenor) brief and confer with J. Robchaud regarding same (1.4).	Del Castillo, Joshua	1.40	763.00	4,501.50	WO	HD	TR	_____
10/05/23	9368398	Confer with J. del Castillo regarding additional revisions to be made to the	Robichaud, James	0.50	222.50	4,724.00	WO	HD	TR	_____

02/13/24 11:04:15 PROFORMA STATEMENT FOR MATTER 392775.00002 (Winkler, Geoff - Receiver for J&J Consul) (General Receivership)

Fees for Matter 392775.00002.(General Receivership)

Trans Date	Index	Description of Service Rendered	Timekeeper	Hours	Fees	Sum	Circle	Action		
		Shahabe reply brief (.5).								
10/06/23	9369361	Complete final review and edits to all appellate (intervenor) materials (1.1); confer with AM counsel regarding same (0.9); and finalize opening brief for filing (0.7).	Del Castillo, Joshua	2.70	1,471.50	6,195.50	WO	HD	TR	_____
10/09/23	9371864	Review docket and attend to opening brief filing matters (0.5); review Receiver's recently filed motions (0.5).	Del Castillo, Joshua	1.00	545.00	6,740.50	WO	HD	TR	_____
10/09/23	9373773	Evaluate final issues and appellate brief draft regarding intervention brief/order and follow-up with counsel (.7). Review/evaluate the Grigsby filings, OSC, contempt, turnover pleadings and follow-up with counsel (.6).	Zaro, David	1.30	708.50	7,449.00	WO	HD	TR	_____
10/17/23	9381177	Review case administration checklist and emails with counsel and Receiver's office regarding pending case administration matters (0.7).	Del Castillo, Joshua	0.70	381.50	7,830.50	WO	HD	TR	_____
10/18/23	9382384	Review notes from discussion with Receiver's office and attention to pending case administration matters (0.2); emails with Receiver's office regarding same (0.5).	Del Castillo, Joshua	0.70	381.50	8,212.00	WO	HD	TR	_____
10/23/23	9387935	Emails and confer with AM counsel and Receiver's office regarding upcoming status hearing (0.5); review recent filings (0.3).	Del Castillo, Joshua	0.80	436.00	8,648.00	WO	HD	TR	_____
10/26/23	9392170	Prepare for and attend videoconference with Receiver's office and co-counsel (0.4).	Del Castillo, Joshua	0.40	218.00	8,866.00	WO	HD	TR	_____

02/13/24 11:04:15 PROFORMA STATEMENT FOR MATTER 392775.00002 (Winkler, Geoff - Receiver for J&J Consul) (General Receivership)

Fees for Matter 392775.00002.(General Receivership)

Trans Date	Index	Description of Service Rendered	Timekeeper	Hours	Fees	Sum	Circle	Action		
10/30/23	9395640	Review Shahabe Appellate Reply brief and legal analysis of arguments presented therein (2.4); emails to receivership team regarding same (0.2).	Del Castillo, Joshua	2.60	1,417.00	10,283.00	WO	HD	TR	_____
11/02/23	9401940	Prepare for and attend videoconference with Receiver's office and co-counsel (0.5).	Del Castillo, Joshua	0.50	272.50	10,555.50	WO	HD	TR	_____
11/14/23	9414725	Review Shahabe appellate docket and emails to AM counsel regarding anticipated oral argument scheduling (0.2).	Del Castillo, Joshua	0.20	109.00	10,664.50	WO	HD	TR	_____
11/16/23	9417576	Review correspondence from Receiver's office regarding pending case administration tasks (0.5); prepare for and attend videoconference with Receiver's office and GT co-counsel (0.7).	Del Castillo, Joshua	1.20	654.00	11,318.50	WO	HD	TR	_____
11/21/23	9423038	Review recent filings and confer with D. Zaro regarding same (0.8).	Del Castillo, Joshua	0.80	436.00	11,754.50	WO	HD	TR	_____
11/22/23	9424653	Review docket and confer with AM counsel regarding pending case administration tasks (0.3).	Del Castillo, Joshua	0.30	163.50	11,918.00	WO	HD	TR	_____
11/30/23	9431183	Prepare for and attend videoconference regarding case administration issues with Receiver's office (0.3).	Del Castillo, Joshua	0.30	163.50	12,081.50	WO	HD	TR	_____
12/04/23	9436299	Review Ninth Circuit orders regarding oral argument and review necessary forms regarding same (0.5); confer with R. MacKenzie at SEC regarding oral argument apportionment and follow-up correspondence to Receiver regarding same (0.5).	Del Castillo, Joshua	1.00	545.00	12,626.50	WO	HD	TR	_____

02/13/24 11:04:15 PROFORMA STATEMENT FOR MATTER 392775.00002 (Winkler, Geoff - Receiver for J&J Consul) (General Receivership)

Fees for Matter 392775.00002.(General Receivership)

Trans Date	Index	Description of Service Rendered	Timekeeper	Hours	Fees	Sum	Circle Action			
12/04/23	9439816	Review the emails related to oral argument related to the intervention appeal and evaluate strategy (.4). Call with Receiver counsel, advice related to oral argument re: intervention appeal (.2).	Zaro, David	0.60	327.00	12,953.50	WO	HD	TR	_____
12/07/23	9444114	Virtually attend meeting with client's team regarding case updates and outstanding tasks	Pham, Matt D.	0.50	222.50	13,176.00	WO	HD	TR	_____
12/12/23	9445392	Review docket and recent filings (0.5); confer with AM counsel regarding upcoming hearing (0.5); follow-up with Receiver's office (0.2).	Del Castillo, Joshua	1.20	654.00	13,830.00	WO	HD	TR	_____
12/13/23	9446654	Review docket and recent filing (0.2).	Del Castillo, Joshua	0.20	109.00	13,939.00	WO	HD	TR	_____
12/13/23	9452106	Virtually attend hearing on pending motions and fee applications	Pham, Matt D.	1.00	445.00	14,384.00	WO	HD	TR	_____
12/14/23	9448353	Review notes regarding outstanding case administration and discovery related materials (0.3); prepare and respond to follow-up correspondence to AM counsel (0.4).	Del Castillo, Joshua	0.70	381.50	14,765.50	WO	HD	TR	_____
12/21/23	9456536	Review agenda from Receiver's office and confer with M. Pham regarding same (0.3); prepare for and attend videoconfereneec with Receiver and GT co-counsel (0.4); follow-up discussion with M. Pham regarding pending case administration matters (0.5).	Del Castillo, Joshua	1.20	654.00	15,419.50	WO	HD	TR	_____

02/13/24 11:04:15 PROFORMA STATEMENT FOR MATTER 392775.00002 (Winkler, Geoff - Receiver for J&J Consul) (General Receivership)

Fees for Matter 392775.00002.(General Receivership)

Trans Date	Index	Description of Service Rendered	Timekeeper	Hours	Fees	Sum	Circle	Action		
12/26/23	9459270	Review dockets and attend to pending case administration matters (0.5).	Del Castillo, Joshua	0.50	272.50	15,692.00	WO	HD	TR	_____
12/28/23	9465133	Virtually attend meeting with client, his team, and Greenberg Traurig regarding case updates and outstanding tasks	Pham, Matt D.	0.30	133.50	15,825.50	WO	HD	TR	_____

Disbursements for Matter 392775.00002 (General Receivership)

Trans Date	Index	Type	Quantity	Amt	Circle	Action		
09/05/23	2860675	DCSRCH – Document Search - PACER - Usage 3RD QTR	0.00	3.00	WO	HD	TR	_____
09/05/23	2860676	DCSRCH – Document Search - PACER - Usage 3RD QTR	0.00	12.30	WO	HD	TR	_____
09/05/23	2860677	DCSRCH – Document Search - PACER - Usage 3RD QTR	0.00	8.70	WO	HD	TR	_____
10/01/23	2844632	EDISC – CS Disco, Inc. - Monthly Hosting for October 2023	0.00	169.44	WO	HD	TR	_____
10/10/23	2842374	BW – Duplication - Black & White Copies	266.00	50.54	WO	HD	TR	_____
10/11/23	2843984	MSNGR – Federal Express - Ship To: Office of the Clerk - James R Browning Courthouse	0.00	35.71	WO	HD	TR	_____
11/01/23	2847798	EDISC – CS Disco, Inc. - Monthly Hosting for November 2023	0.00	169.44	WO	HD	TR	_____
11/13/23	2847539	POS – Nationwide Legal, LLC - Citibank, National Association, SUBPOENA TO PRODUCE DOCUMENTS, INFORMATION, OR OBJECTS OR TO PERMIT INSPECTION OF PREMISES IN A CIVIL ACTION	0.00	168.90	WO	HD	TR	_____
11/13/23	2847540	POS – Nationwide Legal, LLC - Comenity Bank, SUBPOENA TO PRODUCE DOCUMENTS, INFORMATION, OR OBJECTS OR TO PERMIT INSPECTION OF PREMISES IN A CIVIL ACTION	0.00	303.80	WO	HD	TR	_____
11/13/23	2847541	POS – Nationwide Legal, LLC - Charles Schwab & Co., Inc.,	0.00	189.60	WO	HD	TR	_____

02/13/24 11:04:15 PROFORMA STATEMENT FOR MATTER 392775.00002 (Winkler, Geoff - Receiver for J&J Consul) (General Receivership)

Disbursements for Matter 392775.00002 (General Receivership)

Trans Date	Index	Type	Quantity	Amt					
11/13/23	2847542	SUBPOENA TO PRODUCE DOCUMENTS, INFORMATION, OR OBJECTS OR TO PERMIT INSPECTION OF PREMISES IN A CIVIL ACTION POS – Nationwide Legal, LLC - Bank of America, National Association, SUBPOENA TO PRODUCE DOCUMENTS, INFORMATION, OR OBJECTS OR TO PERMIT INSPECTION OF PREMISES IN A CIVIL ACTION	0.00	171.60	WO	HD	TR	_____	
11/13/23	2847543	POS – Nationwide Legal, LLC - Discover Bank, SUBPOENA TO PRODUCE DOCUMENTS, INFORMATION, OR OBJECTS OR TO PERMIT INSPECTION OF PREMISES IN A CIVIL ACTION	0.00	189.60	WO	HD	TR	_____	
11/13/23	2847544	POS – Nationwide Legal, LLC - East West Bank, SUBPOENA TO PRODUCE DOCUMENTS, INFORMATION, OR OBJECTS OR TO PERMIT INSPECTION OF PREMISES IN A CIVIL ACTION	0.00	176.20	WO	HD	TR	_____	
11/15/23	2848461	MSNGR – Federal Express - Ship To: John Hall - American Fiduciary Services LL	0.00	34.15	WO	HD	TR	_____	
11/16/23	2853500	POS – Nationwide Legal, LLC - Washington Trust Bank, SUBPOENA TO PRODUCE DOCUMENTS, INFORMATION, OR OBJECTS OR TO PERMIT INSPECTION OF PREMISES IN A CIVIL ACTION	0.00	597.70	WO	HD	TR	_____	
11/16/23	2854136	POS – Process of Service - Nationwide Legal LLC - The Northern Trust Company SUBPOENA TO PRODUCE DOCUMENTS, INFORMATION, OR OBJECTS OR TO PERMIT INSPECTION OF PREMISES IN A CIVIL ACTION	0.00	304.90	WO	HD	TR	_____	
11/16/23	2854137	POS – Process of Service - Nationwide Legal LLC - The Bank of New York Mellon SUBPOENA TO PRODUCE DOCUMENTS, INFORMATION, OR OBJECTS OR TO PERMIT INSPECTION OF PREMISES IN A CIVIL ACTION	0.00	172.80	WO	HD	TR	_____	
11/16/23	2854140	POS – Process of Service - Nationwide Legal LLC - Vantage West Credit Union SUBPOENA TO PRODUCE DOCUMENTS, INFORMATION, OR OBJECTS OR TO PERMIT INSPECTION OF PREMISES IN A CIVIL ACTION	0.00	223.80	WO	HD	TR	_____	
11/16/23	2854142	POS – Process of Service - Nationwide Legal LLC - Mountain America Credit Union SUBPOENA TO PRODUCE DOCUMENTS, INFORMATION, OR OBJECTS OR TO	0.00	301.60	WO	HD	TR	_____	

02/13/24 11:04:15 PROFORMA STATEMENT FOR MATTER 392775.00002 (Winkler, Geoff - Receiver for J&J Consul) (General Receivership)

Disbursements for Matter 392775.00002 (General Receivership)

Trans Date	Index	Type	Quantity	Amt				
11/16/23	2854143	PERMIT INSPECTION OF PREMISES IN A CIVIL ACTION POS – Process of Service - Nationwide Legal LLC - Barclays Bank Delaware SUBPOENA TO PRODUCE DOCUMENTS, INFORMATION, OR OBJECTS OR TO PERMIT INSPECTION OF PREMISES IN A CIVIL ACTION	0.00	301.60	WO	HD	TR	_____
11/17/23	2853498	POS – Nationwide Legal, LLC - Meadows Bank, SUBPOENA TO PRODUCE DOCUMENTS, INFORMATION, OR OBJECTS OR TO PERMIT INSPECTION OF PREMISES IN A CIVIL ACTION	0.00	437.70	WO	HD	TR	_____
11/17/23	2854138	POS – Process of Service - Nationwide Legal LLC - Silver State Schools Credit Union c/o Saltzman Mugan Dushoff, PLLC-CRA SUBPOENA TO PRODUCE DOCUMENTS, INFORMATION, OR OBJECTS OR TO PERMIT INSPECTION OF PREMISES IN A CIVIL ACTION	0.00	223.80	WO	HD	TR	_____
11/17/23	2854139	POS – Process of Service - Nationwide Legal LLC - One Nevada Credit Union Attn: Representative for Service of Process SUBPOENA TO PRODUCE DOCUMENTS, INFORMATION, OR OBJECTS OR TO PERMIT INSPECTION OF PREMISES IN A CIVIL ACTION	0.00	221.60	WO	HD	TR	_____
11/17/23	2854141	POS – Process of Service - Nationwide Legal LLC - USAA Federal Savings Bank SUBPOENA TO PRODUCE DOCUMENTS, INFORMATION, OR OBJECTS OR TO PERMIT INSPECTION OF PREMISES IN A CIVIL ACTION	0.00	301.60	WO	HD	TR	_____
11/24/23	2847452	ODS – East West Bank - Produce documents in response to subpoena	0.00	111.47	WO	HD	TR	_____
11/28/23	2857184	ODS – Robertson, Anschutz, Schneid & Crane LLC - Document production by Wells Fargo in response to subpoena issued by Receiver, Geoff Winkler	0.00	82.50	WO	HD	TR	_____
12/01/23	2853788	EDISC – CS Disco, Inc. - Monthly Hosting for December 2023	0.00	1,345.19	WO	HD	TR	_____
12/04/23	2851331	BW – Duplication - Black & White Copies	11.00	2.09	WO	HD	TR	_____
12/05/23	2851421	BW – Duplication - Black & White Copies	13.00	2.47	WO	HD	TR	_____
12/05/23	2853492	POS – Nationwide Legal, LLC - American Express Travel Related Services Company, Inc., SUBPOENA TO PRODUCE	0.00	303.80	WO	HD	TR	_____

02/13/24 11:04:15 PROFORMA STATEMENT FOR MATTER 392775.00002 (Winkler, Geoff - Receiver for J&J Consul) (General Receivership)

Disbursements for Matter 392775.00002 (General Receivership)

Trans Date	Index	Type	Quantity	Amt				
12/05/23	2853493	DOCUMENTS, INFORMATION, OR OBJECTS OR TO PERMIT INSPECTION OF PREMISES IN A CIVIL ACTION POS – Nationwide Legal, LLC - American Express National Bank, SUBPOENA TO PRODUCE DOCUMENTS, INFORMATION, OR OBJECTS OR TO PERMIT INSPECTION OF PREMISES IN A CIVIL ACTION	0.00	303.80	WO	HD	TR	_____
12/05/23	2853494	POS – Nationwide Legal, LLC - UMB Bank, National Association, SUBPOENA TO PRODUCE DOCUMENTS, INFORMATION, OR OBJECTS OR TO PERMIT INSPECTION OF PREMISES IN A CIVIL ACTION	0.00	303.80	WO	HD	TR	_____
12/05/23	2853495	POS – Nationwide Legal, LLC - Citibank, National Association, SUBPOENA TO PRODUCE DOCUMENTS, INFORMATION, OR OBJECTS OR TO PERMIT INSPECTION OF PREMISES IN A CIVIL ACTION	0.00	150.90	WO	HD	TR	_____
12/05/23	2853496	POS – Nationwide Legal, LLC - JPMorgan Chase Bank, National Association, SUBPOENA TO PRODUCE DOCUMENTS, INFORMATION, OR OBJECTS OR TO PERMIT INSPECTION OF PREMISES IN A CIVIL ACTION	0.00	171.60	WO	HD	TR	_____
12/05/23	2853497	POS – Nationwide Legal, LLC - Bank of America, National Association, SUBPOENA TO PRODUCE DOCUMENTS, INFORMATION, OR OBJECTS OR TO PERMIT INSPECTION OF PREMISES IN A CIVIL ACTION	0.00	169.80	WO	HD	TR	_____
12/05/23	2853499	POS – Nationwide Legal, LLC - PayPal, Inc., SUBPOENA TO PRODUCE DOCUMENTS, INFORMATION, OR OBJECTS OR TO PERMIT INSPECTION OF PREMISES IN A CIVIL ACTION	0.00	172.20	WO	HD	TR	_____
12/18/23	2852877	ODS – Citibank N.A. - Document production in response to a subpoena served by the Receiver, Geoff Winkler	0.00	65.28	WO	HD	TR	_____
12/27/23	2857361	MSNGR – Federal Express - Ship To: John Hall - American Fiduciary Services LL	0.00	25.98	WO	HD	TR	_____

Proforma Summary**Timekeeper**

Number	Timekeeper	Hours	Rate	Amounts
000313	Zaro, David	1.90	545.00	1,035.50
001842	Del Castillo, Joshua	23.30	545.00	12,698.50
002510	Pham, Matt D.	1.80	445.00	801.00
002592	Robichaud, James	2.90	445.00	1,290.50

02/13/24 11:04:15 PROFORMA STATEMENT FOR MATTER 392775.00002 (Winkler, Geoff - Receiver for J&J Consul) (General Receivership)

Proforma Summary

Timekeeper

Number	Timekeeper	Hours	Rate	Amounts
		29.90		\$15,825.50
Subtotal Fees				\$15,825.50
Discount				0.00
Total Fees				15,825.50
Total Disbursements				7,980.96

Attorney Billing Instructions

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

Billing Instructions

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

Account Summary – As Of 02/01/24

	Fiscal YTD			Calendar YTD			LTD		
	Total	Fees	Disb.	Total	Fees	Disb.	Total	Fees	Disbursements
Worked	63,764.68	63,266.50	498.18	7,357.50	7,357.50	0.00	221,177.56	197,783.50	23,394.06
Unbilled Adj	804.40	804.40	0.00	0.00	0.00	0.00	2,595.20	2,251.20	344.00
Billed	61,241.19	59,450.70	1,790.49	0.00	0.00	0.00	172,675.12	172,675.12	15,413.10
Collected	61,241.19	59,450.70	1,790.49	0.00	0.00	0.00	188,088.22	172,675.12	15,413.10
AR Write Off	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00
WIP	31,513.59	23,183.00	8,330.59						
Balance									
AR Balance	0.00	0.00	0.00						
Unalloc	0.00								
Payment									
Client Trust	0.00								
Balance									

Billing Address

02/13/24 11:04:15 PROFORMA STATEMENT FOR MATTER 392775.00002 (Winkler, Geoff - Receiver for J&J Consul) (General Receivership)

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

02/13/24 11:04:16 PROFORMA STATEMENT FOR MATTER 392775.00003 (Winkler, Geoff - Receiver for J&J Consul) (Asset Recovery & Management)

Preliminary Billing Form

Billing Atty: 001842 - Del Castillo, Matter #: 392775.00003 Client Name: Winkler, Geoff - Receiver for J&J Consul
 Joshua
 Date of Last Billing: 12/26/23 Matter Name: Asset Recovery & Management
 Proforma Number: 1257810
 Client/Matter Joint Group # 392775.1 Client Matter Number:

Fees for Matter 392775.00003.(Asset Recovery & Management)

Trans Date	Index	Description of Service Rendered	Timekeeper	Hours	Fees	Sum	Circle	Action	
10/04/23	9368098	Review status of the Eco-battery claims and pending issues related to recovery of equity investments, conference with counsel.	Zaro, David	0.60	327.00	327.00	WO	HD	TR
10/20/23	9385167	Review Receiver motion and Grigsby response to same (0.5); review documents and follow-up emails with Receiver's office regarding real property title inquiry (0.3).	Del Castillo, Joshua	0.80	436.00	763.00	WO	HD	TR
10/27/23	9393471	Review correspondence and reply regarding Grigsby turnover (0.3).	Del Castillo, Joshua	0.30	163.50	926.50	WO	HD	TR

Proforma Summary

Timekeeper		Hours	Rate	Amounts
Number	Timekeeper			
000313	Zaro, David	0.60	545.00	327.00
001842	Del Castillo, Joshua	1.10	545.00	599.50
		<u>1.70</u>		<u>\$926.50</u>
Subtotal Fees				\$926.50
Discount				0.00
Total Fees				926.50
Total Disbursements				0.00

02/13/24 11:04:16 PROFORMA STATEMENT FOR MATTER 392775.00003 (Winkler, Geoff - Receiver for J&J Consul) (Asset Recovery & Management)

Attorney Billing Instructions

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

Billing Instructions

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

Account Summary – As Of 02/01/24

	Fiscal YTD			Calendar YTD			LTD		
	Total	Fees	Disb.	Total	Fees	Disb.	Total	Fees	Disbursements
Worked	15,839.50	15,839.50	0.00	10,389.50	10,389.50	0.00	202,382.00	202,382.00	0.00
Unbilled Adj	0.00	0.00	0.00	0.00	0.00	0.00	4,868.39	4,823.07	45.32
Billed	40,124.00	40,124.00	0.00	0.00	0.00	0.00	186,574.07	186,574.07	0.00
Collected	40,124.00	40,124.00	0.00	0.00	0.00	0.00	186,574.07	186,574.07	0.00
AR Write Off	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00
WIP Balance	11,316.00	11,316.00	0.00						
AR Balance	0.00	0.00	0.00						
Unalloc Payment	0.00								
Client Trust Balance	0.00								

Billing Address

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

02/13/24 11:04:17 PROFORMA STATEMENT FOR MATTER 392775.00004 (Winkler, Geoff - Receiver for J&J Consul) (Investigation & Reporting)

Preliminary Billing FormBilling Atty: 001842 - Del Castillo,
Joshua

Matter #: 392775.00004

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

Date of Last Billing: 12/26/23

Matter Name: Investigation & Reporting

Proforma Number: 1257810

Client/Matter Joint Group # 392775.1

Client Matter Number:

Fees for Matter 392775.00004.(Investigation & Reporting)

Trans Date	Index	Description of Service Rendered	Timekeeper	Hours	Fees	Sum	Circle	Action		
10/02/23	9364655	Follow-up emails to bank counsel regarding document turnover and related discovery requests (0.9).	Del Castillo, Joshua	0.90	490.50	490.50	WO	HD	TR	_____
10/03/23	9365751	Review docket and correspondence from Receiver's office regarding interim report (0.5); prepare draft sections for interim report (0.5); prepare follow-up inquiry to bank counsel regarding production of documents (0.3); confer with M. Pham regarding load file requested from Wells Fargo and review notes regarding same (0.4).	Del Castillo, Joshua	1.70	926.50	1,417.00	WO	HD	TR	_____
10/03/23	9366809	Conference with counsel to evaluate the records production, transfer and pending requests, follow-up.	Zaro, David	0.40	218.00	1,635.00	WO	HD	TR	_____
10/04/23	9368100	Evaluate the final draft of the intervention appeal and meeting with counsel to address the brief.	Zaro, David	0.40	218.00	1,853.00	WO	HD	TR	_____
10/09/23	9373769	Follow-up on the motion/protective order related to defendant record requests re:	Zaro, David	0.70	381.50	2,234.50	WO	HD	TR	_____

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Fees for Matter 392775.00004.(Investigation & Reporting)

Trans Date	Index	Description of Service Rendered	Timekeeper	Hours	Fees	Sum	Circle Action			
		records associated with the WFB case (.5). Confer with counsel to address compilation and anticipated production of records (.2).								
10/10/23	9378974	Email correspondence with Grace Radke and Zions Bancorporation representative regarding production of documents	Pham, Matt D.	0.30	133.50	2,368.00	WO	HD	TR	_____
10/11/23	9374952	Conference with M. Pham regarding Wells Fargo production and follow-up emails regarding same (0.6); follow-up correspondence to bank counsel regarding document productions (0.7).	Del Castillo, Joshua	1.30	708.50	3,076.50	WO	HD	TR	_____
10/11/23	9378979	Email correspondence with client regarding Chase supplemental production	Pham, Matt D.	0.20	89.00	3,165.50	WO	HD	TR	_____
10/12/23	9376024	Review and comment regarding revised litigation summary for next interim report (0.3).	Del Castillo, Joshua	0.30	163.50	3,329.00	WO	HD	TR	_____
10/12/23	9376179	Review materials and related emails to M. Pham and Receiver's office regarding outstanding discovery and discovery clarification requests (1.0).	Del Castillo, Joshua	1.00	545.00	3,874.00	WO	HD	TR	_____
10/13/23	9379030	Email correspondence with client regarding prior production from Bitcoin IRA	Pham, Matt D.	0.20	89.00	3,963.00	WO	HD	TR	_____
10/16/23	9379303	Confer with M. Pham and Receiver's office regarding document production inquiries and follow-ups (0.5); email to U.S. Bank counsel regarding document production questions (0.2).	Del Castillo, Joshua	0.70	381.50	4,344.50	WO	HD	TR	_____

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Fees for Matter 392775.00004.(Investigation & Reporting)

Trans Date	Index	Description of Service Rendered	Timekeeper	Hours	Fees	Sum	Circle Action			
10/16/23	9380493	Follow-up inquiries regarding next interim report (0.5).	Del Castillo, Joshua	0.50	272.50	4,617.00	WO	HD	TR	_____
10/20/23	9384702	Review files and bank correspondence and productions in connection with Receiver accounting inquiry (0.8); emails to Receiver and D. Zaro regarding same (0.3); attention to outstanding document and data production issues (0.9); emails to M. Pham regarding same (0.2).	Del Castillo, Joshua	2.20	1,199.00	5,816.00	WO	HD	TR	_____
10/20/23	9385001	Review and respond to inquiries regarding reporting to Court (0.6).	Del Castillo, Joshua	0.60	327.00	6,143.00	WO	HD	TR	_____
10/25/23	9390811	Review and respond to correspondence from opposing and co-counsel regarding depositions (0.2).	Del Castillo, Joshua	0.20	109.00	6,252.00	WO	HD	TR	_____
10/25/23	9390917	Review docket and correspondence with Receiver's office regarding next interim report (0.5).	Del Castillo, Joshua	0.50	272.50	6,524.50	WO	HD	TR	_____
10/25/23	9390987	Review notes relating to outstanding discovery (0.4); follow-up with U.S. Bank and Wells Fargo Bank regarding production of documents and outstanding Receiver inquiries (0.6).	Del Castillo, Joshua	1.00	545.00	7,069.50	WO	HD	TR	_____
10/31/23	9398370	Review draft interim report and emails regarding same (0.4).	Del Castillo, Joshua	0.40	218.00	7,287.50	WO	HD	TR	_____
10/31/23	9399745	Several emails with Receiver concerning the accounting for Flavocure interests, follow-up to assess interests.	Zaro, David	0.60	327.00	7,614.50	WO	HD	TR	_____

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Fees for Matter 392775.00004.(Investigation & Reporting)

Trans Date	Index	Description of Service Rendered	Timekeeper	Hours	Fees	Sum	Circle	Action		
11/01/23	9400752	Review correspondence from Receiver's office regarding outstanding document productions (0.4); review details of subpoenas transmitted on Receiver's behalf (0.5); confer with D. Zaro and M. Pham regarding same (0.6); emails to Receiver's office (0.2).	Del Castillo, Joshua	1.70	926.50	8,541.00	WO	HD	TR	_____
11/01/23	9404107	Review and analyze Bank of America and other productions and prior subpoenas regarding scope thereof (2.5); email correspondence with client' regarding Bank of America production, subpoenas to Charles Schwab and Bank of America, other document productions (1.1).	Pham, Matt D.	3.60	1,602.00	10,143.00	WO	HD	TR	_____
11/01/23	9404642	Analysis and determination of document productions in preparation for attorney review.	Peng, Simona	0.30	105.00	10,248.00	WO	HD	TR	_____
11/02/23	9401942	Review and respond to correspondence from Receiver's office regarding document production issues (0.5); confer with M. Pham regarding same (0.5).	Del Castillo, Joshua	1.00	545.00	10,793.00	WO	HD	TR	_____
11/02/23	9403065	Work with counsel to address responses to subpoenas and production issues, follow-up on several emails and communications with Receiver and counsel.	Zaro, David	0.80	436.00	11,229.00	WO	HD	TR	_____
11/02/23	9404115	Email correspondence with Wells Fargo's counsel regarding update on production of load file/spreadsheet (0.2); Email correspondence with client's regarding document productions and subpoenas (0.6)	Pham, Matt D.	0.80	356.00	11,585.00	WO	HD	TR	_____

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Fees for Matter 392775.00004.(Investigation & Reporting)

Trans Date	Index	Description of Service Rendered	Timekeeper	Hours	Fees	Sum	Circle Action			
11/03/23	9402820	Confer extensively with M. Pham and D. Zaro regarding outstanding document and related turnover issues (0.9); emails regarding same (0.5); follow-up regarding outstanding Wells Fargo and Bank of America matters (0.6).	Del Castillo, Joshua	2.00	1,090.00	12,675.00	WO	HD	TR	_____
11/03/23	9404124	Confer with Josh del Castillo regarding issues relating to document productions (0.3); Email correspondence with client's team regarding additional subpoenas (0.3)	Pham, Matt D.	0.60	267.00	12,942.00	WO	HD	TR	_____
11/06/23	9405289	Emails and teleconferences with AM personnel regarding document recovery and management matters (0.5); follow-up emails regarding Bank of America and Wells productions (0.5).	Del Castillo, Joshua	1.00	545.00	13,487.00	WO	HD	TR	_____
11/07/23	9406336	Emails and teleconferences with D. Zaro and M. Pham regarding document production issues (0.9); review and respond to inquiries from Receiver's office regarding same (0.5); follow-up with Bank of America regarding document productions (0.5).	Del Castillo, Joshua	1.90	1,035.50	14,522.50	WO	HD	TR	_____
11/07/23	9409240	Review/evaluate the prior communications with BofA and follow-up on Receiver email related to documents from Bank of America, further production/timing.	Zaro, David	0.80	436.00	14,958.50	WO	HD	TR	_____
11/07/23	9412751	Confer with David Zaro regarding Bank of America's document production (0.1); Phone calls with Bank of America representative regarding update on supplemental production (0.3); Email correspondence with client regarding	Pham, Matt D.	1.50	667.50	15,626.00	WO	HD	TR	_____

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Fees for Matter 392775.00004.(Investigation & Reporting)

Trans Date	Index	Description of Service Rendered	Timekeeper	Hours	Fees	Sum	Circle Action			
		update on Bank of America's supplemental production (0.4); Email correspondence with David Zaro and Josh del Castillo regarding Bank of America's supplemental production and related issues (0.7)								
11/08/23	9407677	Confer with M. Pham regarding pending document production issues (0.5).	Del Castillo, Joshua	0.50	272.50	15,898.50	WO	HD	TR	_____
11/08/23	9409257	Several email communications among Receiver and counsel related to accounting, bank's production and coordination of records production (.4). Call with counsel related to BofA documents and production issues, advice re: strategy to expedite production (.4).	Zaro, David	0.80	436.00	16,334.50	WO	HD	TR	_____
11/08/23	9410801	Analysis and determination of document productions in preparation for attorney review.	Peng, Simona	0.30	105.00	16,439.50	WO	HD	TR	_____
11/08/23	9412769	Phone call with Bank of America representative regarding re-production of original document production, and email correspondence with client regarding same (0.6); Prepare additional set of subpoenas to various banks and financial institutions (3.3)	Pham, Matt D.	3.90	1,735.50	18,175.00	WO	HD	TR	_____
11/09/23	9409052	Review Receiver emails regarding outstanding discovery (0.2); extensive emails and teleconferences with counsel and litigation tech support regarding same (1.4).	Del Castillo, Joshua	1.60	872.00	19,047.00	WO	HD	TR	_____

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Fees for Matter 392775.00004.(Investigation & Reporting)

Trans Date	Index	Description of Service Rendered	Timekeeper	Hours	Fees	Sum	Circle	Action		
11/09/23	9412652	Several emails/calls with Receiver, Mr. Hall and counsel to address records and productions from Wells Fargo and Bank of America, follow-up regarding same (.8). Meeting with Receiver, accounting team and counsel to address pending issues re: asset recovery and accounting (.6). Follow-up emails and calls related to discovery (.7).	Zaro, David	2.10	1,144.50	20,191.50	WO	HD	TR	_____
11/09/23	9412783	Confer with Simona Peng regarding use of Wells Fargo's spreadsheet/load file to organize production and review client's cloud drive of document productions (0.3); Confer with David Zaro regarding document production issues (0.6); Continue preparing additional subpoenas to financial institutions (2.3); Review and analyze JPMorgan Chase's document production, prior subpoena thereto, and Grace Radke's spreadsheet in preparation for follow-up request and additional subpoena (0.9)	Pham, Matt D.	4.10	1,824.50	22,016.00	WO	HD	TR	_____
11/10/23	9410088	Teleconferences and emails with U.S. Bank counsel and AM counsel regarding document demand transmitted from Receiver's office and attention to issues regarding same (0.7); follow-up communications to bank counsel and AM counsel regarding pending document requests / clarifications and attention to processing inquiry (0.5).	Del Castillo, Joshua	1.20	654.00	22,670.00	WO	HD	TR	_____
11/10/23	9410815	Analysis and determination of document productions in preparation for attorney review.	Peng, Simona	0.30	105.00	22,775.00	WO	HD	TR	_____

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Fees for Matter 392775.00004.(Investigation & Reporting)

Trans Date	Index	Description of Service Rendered	Timekeeper	Hours	Fees	Sum	Circle	Action		
11/10/23	9411969	ORGANIZE DOCUMENTS FOR ATTORNEY AND CLIENT REVIEW	Neglia, Ross	1.50	525.00	23,300.00	WO	HD	TR	_____
11/10/23	9412793	Draft emails to Tower 18 and Horizon Trust regarding follow-up requests for documents (0.5); Email correspondence with Grace Radke regarding additional document requests to Wells Fargo (0.6); Update and revise additional set of subpoenas to financial institutions (1.3); Email correspondence with Grace Radke regarding updates on document productions (0.3); Confer with Josh del Castillo regarding document productions update (0.1); Continue reviewing JPMorgan Chase's document production and Grace Radke's spreadsheet for purpose of preparing additional Chase subpoena (0.6)	Pham, Matt D.	3.40	1,513.00	24,813.00	WO	HD	TR	_____
11/10/23	9412849	Several calls related to the subpoenas and the production of records to follow-up on the recent productions from Wells Fargo and BofA, and supplemental requests.	Zaro, David	0.40	218.00	25,031.00	WO	HD	TR	_____
11/13/23	9412533	Confer with J. del Castillo and M. Pham regarding outstanding subpoenas to be drafted (.3); review spreadsheet setting forth information to be requested from banks provided by G. Radke of Receiver's staff (.5).	Robichaud, James	0.80	356.00	25,387.00	WO	HD	TR	_____
11/13/23	9413938	Teleconferences and emails with M. Pham regarding additional requests by Receiver for numerous document subpoenas (1.0); review Receiver's scheduled of additionally requested materials (0.3); emails and	Del Castillo, Joshua	2.90	1,580.50	26,967.50	WO	HD	TR	_____

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Fees for Matter 392775.00004.(Investigation & Reporting)

Trans Date	Index	Description of Service Rendered	Timekeeper	Hours	Fees	Sum	Circle Action			
		confer with J. Robichaud regarding same (0.6); review materials and prepare demand letter to Wells Fargo (1.0).								
11/13/23	9414877	Several calls/emails with counsel/Receiver related to records/subpoenas and strategy to expedite production.	Zaro, David	0.40	218.00	27,185.50	WO	HD	TR	_____
11/13/23	9420004	IDENTIFY RELEVANT WELLS FARGO DOCUMENTS FOR ATTORNEY AND CLIENT REVIEW	Neglia, Ross	2.10	735.00	27,920.50	WO	HD	TR	_____
11/13/23	9420470	Review 15 emails from Grace Radke regarding additional requests for bank records and begin preparing new subpoenas and follow-up letters (2.8); Confer with James Robichaud regarding preparation of additional subpoenas (0.2); Confer with Josh del Castillo regarding follow-up with Wells Fargo and additional subpoenas to banks (0.3)	Pham, Matt D.	3.30	1,468.50	29,389.00	WO	HD	TR	_____
11/14/23	9414647	Follow-up correspondence with counsel for Wells Fargo and Receiver's office regarding supplemental document request (0.7); emails and confer with J. Robichaud regarding outstanding subpoenas (0.4).	Del Castillo, Joshua	1.10	599.50	29,988.50	WO	HD	TR	_____
11/14/23	9414830	Review correspondence with G. Radke and M. Pham regarding additional subpoenas to be propounded (.9); research and identify addresses of registered agent for entities for service of process (.7); draft and revise subpoenas and supporting attachments (1.5).	Robichaud, James	3.10	1,379.50	31,368.00	WO	HD	TR	_____

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Fees for Matter 392775.00004.(Investigation & Reporting)

Trans Date	Index	Description of Service Rendered	Timekeeper	Hours	Fees	Sum	Circle	Action		
11/14/23	9417171	Review of several emails/call with counsel related to the subpoenas and discovery issues/additional documents.	Zaro, David	0.60	327.00	31,695.00	WO	HD	TR	_____
11/14/23	9420491	Phone call with Bank of America representative regarding access to supplemental document production (0.1); Review subpoenas to banks prepared by James Robichaud and confer with him regarding changes to be made thereto (0.6)	Pham, Matt D.	0.70	311.50	32,006.50	WO	HD	TR	_____
11/15/23	9416065	Revise subpoenas to be served upon financial institutions (.8); draft additional subpoenas (1.0); research to identify registered agents of certain financial institution (.4).	Robichaud, James	2.20	979.00	32,985.50	WO	HD	TR	_____
11/15/23	9417193	Emails related to jurisdictional issues, follow-up research and email response to inquiry (.7). Conferences with Receiver counsel related to the records, production issues and address new subpoena timing (.4).	Zaro, David	1.10	599.50	33,585.00	WO	HD	TR	_____
11/15/23	9420017	COMPILE WELLS FARGO AND ADDITIONAL DATA FOR TRANSMISSION TO CLIENT	Neglia, Ross	1.30	455.00	34,040.00	WO	HD	TR	_____
11/15/23	9420506	Email correspondence with client regarding Bank of America and Wells Fargo supplemental productions	Pham, Matt D.	0.30	133.50	34,173.50	WO	HD	TR	_____
11/16/23	9417575	Confer with M. Pham and J. Robichaud regarding pending subpoenas (0.5); prepare for and teleconference with Wells Fargo counsel regarding Receiver's position	Del Castillo, Joshua	2.10	1,144.50	35,318.00	WO	HD	TR	_____

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Fees for Matter 392775.00004.(Investigation & Reporting)

Trans Date	Index	Description of Service Rendered	Timekeeper	Hours	Fees	Sum	Circle	Action		
		regarding incomplete productions and follow-up regarding same (1.0); legal analysis of issues raised on call (0.6).								
11/17/23	9418581	Additional research regarding identifying registered agents for parties to be served (.7); draft additional subpoenas (.6).	Robichaud, James	1.30	578.50	35,896.50	WO	HD	TR	_____
11/17/23	9420561	Confer with Josh del Castillo regarding client meeting and next steps regarding document subpoenas/productions (0.2); review of document production from Ally Bank (0.2); Email correspondence with Ally Bank regarding document production (0.2)	Pham, Matt D.	0.60	267.00	36,163.50	WO	HD	TR	_____
11/20/23	9421909	Follow-up telephone calls and voicemail to bank counsel regarding pending document production inquiries (0.8); confer with M. Pham regarding same (0.2); review materials provided by Receiver's office in connection with clarification of document demand (0.4); emails regarding same (0.2).	Del Castillo, Joshua	1.60	872.00	37,035.50	WO	HD	TR	_____
11/21/23	9426394	Several conference with Receiver/counsel related to subpoenas, bank responses and advice as to strategy.	Zaro, David	0.30	163.50	37,199.00	WO	HD	TR	_____
11/21/23	9426795	Phone call with Vantage West Credit Union representative regarding subpoena and email correspondence with client regarding Vantage West's request (0.2); Phone calls with Bank of America representative and Comenity Bank representative regarding subpoenas (0.2); Email correspondence with client regarding Bank of America supplemental production and follow-up	Pham, Matt D.	1.10	489.50	37,688.50	WO	HD	TR	_____

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Fees for Matter 392775.00004.(Investigation & Reporting)

Trans Date	Index	Description of Service Rendered	Timekeeper	Hours	Fees	Sum	Circle Action			
11/22/23	9424234	request (0.7) Review response from Wells Fargo counsel regarding production follow-up request, and compare production summary to Receiver schedule for same (1.3); prepare mark-up of production schedule for discussion with Receiver (0.5); confer with AM counsel regarding same (0.3); emails with Receiver's office and special counsel regarding same (0.7); emails and teleconferences with M. Pham regarding Receiver supplemental requests for Bank of America materials (0.5).	Del Castillo, Joshua	3.30	1,798.50	39,487.00	WO	HD	TR	_____
11/22/23	9426350	Additional emails and conference with Receiver counsel related to Wells Fargo production response and Receiver strategy.	Zaro, David	0.30	163.50	39,650.50	WO	HD	TR	_____
11/22/23	9426807	Email correspondence with Grace Radke regarding additional Bank of America document requests (0.3); Confer with Josh del Castillo regarding client's additional document requests (0.4); Prepare revised version of subpoena to Comenity Bank and Comenity Capital Bank (0.3)	Pham, Matt D.	1.00	445.00	40,095.50	WO	HD	TR	_____
11/23/23	9425022	Follow-up emails to AM counsel regarding pending document demand issues (0.4); review email from Receiver's office regarding same (0.1).	Del Castillo, Joshua	0.50	272.50	40,368.00	WO	HD	TR	_____
11/24/23	9425068	Follow-up emails to AM counsel regarding Receiver's follow-up request to Bank of America (0.3); review schedule provided by Receiver's office and prepare notes	Del Castillo, Joshua	0.70	381.50	40,749.50	WO	HD	TR	_____

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Fees for Matter 392775.00004.(Investigation & Reporting)

Trans Date	Index	Description of Service Rendered	Timekeeper	Hours	Fees	Sum	Circle Action			
11/27/23	9426358	Review and respond to correspondence from Receiver's office regarding pending document discovery and review (0.5); confer with D. Zaro and M. Pham regarding same (0.6); prepare for and teleconference with Receiver and co-counsel regarding Wells Fargo document production issues (0.5); confer with J. Robichaud and M. Pham regarding same (0.5); review draft subpoena and emails with J. Robichaud and M. Pham regarding same (0.5).	Del Castillo, Joshua	2.60	1,417.00	42,166.50	WO	HD	TR	_____
11/27/23	9426861	Attend teleconference with J. del Castillo, receiver, and receiver's litigation counsel regarding Wells Fargo document production (.4); draft updated Wells Fargo subpoena (.8).	Robichaud, James	1.20	534.00	42,700.50	WO	HD	TR	_____
11/27/23	9428164	Evaluate email communications with Receiver/counsel, Wells Fargo Bank and BofA, follow-up on several issues related to the accounting/subpoenas (.7). Follow-up conference with counsel as to the strategy for records production/discovery and approach to banks (.4).	Zaro, David	1.10	599.50	43,300.00	WO	HD	TR	_____
11/27/23	9432617	Phone call and email correspondence with BNY Mellon representative regarding subpoena (0.1); Review email correspondence with and document productions from Bank of America, Charles Schwab, and Mountain America Credit Union (0.5); Phone call with Vantage West Credit Union representative regarding	Pham, Matt D.	2.30	1,023.50	44,323.50	WO	HD	TR	_____

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Fees for Matter 392775.00004.(Investigation & Reporting)

Trans Date	Index	Description of Service Rendered	Timekeeper	Hours	Fees	Sum	Circle	Action		
		information needed for subpoena and email correspondence with client regarding same (0.1); Prepare new subpoena to Chase Bank and review draft of new subpoena to Wells Fargo and other financial institutions (1.6);								
11/28/23	9427882	Revise Wells Fargo subpoena and update with information provided by G. Radke (.6); follow up with PenFed regarding registered agent address (.2); draft Citibank subpoena (.5).	Robichaud, James	1.30	578.50	44,902.00	WO	HD	TR	_____
11/28/23	9428200	Emails with AM counsel regarding pending document subpoenas and discovery follow-up (0.5); review draft subpoenas (0.5).	Del Castillo, Joshua	1.00	545.00	45,447.00	WO	HD	TR	_____
11/28/23	9432622	Review revised subpoena to Wells Fargo and email correspondence with Wells Fargo's counsel regarding service of subpoena	Pham, Matt D.	0.20	89.00	45,536.00	WO	HD	TR	_____
11/29/23	9429552	Review notes and emails with AM counsel regarding outstanding document recovery matters (0.5); follow-up emails to Receiver's office (0.2).	Del Castillo, Joshua	0.70	381.50	45,917.50	WO	HD	TR	_____
11/29/23	9429617	Draft additional subpoenas (.5).	Robichaud, James	0.50	222.50	46,140.00	WO	HD	TR	_____
11/29/23	9432650	Email correspondence and review of document productions from Bank of America, Barclays, Charles Schwab, East West Bank, Mountain America Credit Union, and USAA	Pham, Matt D.	0.80	356.00	46,496.00	WO	HD	TR	_____

02/13/24 11:04:17 PROFORMA STATEMENT FOR MATTER 392775.00004 (Winkler, Geoff - Receiver for J&J Consul) (Investigation & Reporting)

Fees for Matter 392775.00004.(Investigation & Reporting)

Trans Date	Index	Description of Service Rendered	Timekeeper	Hours	Fees	Sum	Circle Action			
11/30/23	9430795	Review subpoenas pending service and discuss same with M. Pham (.2).	Robichaud, James	0.20	89.00	46,585.00	WO	HD	TR	_____
11/30/23	9432636	Confer with M. Pham and AM team regarding pending subpoenas and related document follow-up inquiries (0.6); confer with Receiver's office regarding same (0.5).	Del Castillo, Joshua	1.10	599.50	47,184.50	WO	HD	TR	_____
12/01/23	9435936	Prepare follow-up letters to Bank of America and Chase and additional subpoenas thereto and other financial institutions	Pham, Matt D.	3.20	1,424.00	48,608.50	WO	HD	TR	_____
12/04/23	9436621	Revise and prepare for service subpoenas per M. Pham (.7).	Robichaud, James	0.70	311.50	48,920.00	WO	HD	TR	_____
12/04/23	9436729	Emails and confer with M. Pham regarding pending document subpoenas and request (0.5); follow-up inquiry of Receiver's office (0.2).	Del Castillo, Joshua	0.70	381.50	49,301.50	WO	HD	TR	_____
12/04/23	9444056	Continue drafting follow-up letter and additional subpoenas to Bank of America (2.8); Draft follow-up letters and additional subpoenas to Chase Bank and Citibank (3.1)	Pham, Matt D.	5.90	2,625.50	51,927.00	WO	HD	TR	_____
12/05/23	9437354	Review correspondence from J. Hall regarding apparent post-asset freeze transactions on Beasley account and analysis of accountng previously transmitted by Wells Fargo (1.0); follow-up correspondence to Receiver's office regarding same (0.5).	Del Castillo, Joshua	1.50	817.50	52,744.50	WO	HD	TR	_____

02/13/24 11:04:17 PROFORMA STATEMENT FOR MATTER 392775.00004 (Winkler, Geoff - Receiver for J&J Consul) (Investigation & Reporting)

Fees for Matter 392775.00004.(Investigation & Reporting)

Trans Date	Index	Description of Service Rendered	Timekeeper	Hours	Fees	Sum	Circle	Action		
12/05/23	9439834	Call/email with counsel related to the Wells Fargo records (.4).	Zaro, David	0.40	218.00	52,962.50	WO	HD	TR	_____
12/05/23	9444066	Update and finalize subpoenas to PenFed, Citibank, UMB Bank, PayPal, American Express, Chase, and Bank of America (1.8); Email correspondence with Grace Radke regarding Wells Fargo document production and other subpoenas (0.4)	Pham, Matt D.	2.20	979.00	53,941.50	WO	HD	TR	_____
12/06/23	9438491	Emails and confer with AM counsel regarding pending inquiries regarding document production to Wells Fargo and other banks (0.5).	Del Castillo, Joshua	0.50	272.50	54,214.00	WO	HD	TR	_____
12/06/23	9439067	Review current and prior subpoena requests documents submitted by client and match requests against served subpoenas to ensure that all accounts are accounted for (2.0).	Robichaud, James	2.00	890.00	55,104.00	WO	HD	TR	_____
12/07/23	9439586	Follow-up with Receiver's office regarding pending requests to Wells Fargo (0.3); emails regarding same (0.5); review additional notes and prepare correspondence to Wells Fargo counsel (0.5); review and respond to inquiry from co-counsel regarding recent subpoenas and confer with M. Pham regarding same (0.3); review letter from counsel regarding objection to subpoena and confer with M. Pham and Receiver's office regarding same (0.5).	Del Castillo, Joshua	2.10	1,144.50	56,248.50	WO	HD	TR	_____
12/07/23	9444111	Review letter and emails from Johnson's and Madsen's counsel regarding	Pham, Matt D.	0.70	311.50	56,560.00	WO	HD	TR	_____

02/13/24 11:04:17 PROFORMA STATEMENT FOR MATTER 392775.00004 (Winkler, Geoff - Receiver for J&J Consul) (Investigation & Reporting)

Fees for Matter 392775.00004.(Investigation & Reporting)

Trans Date	Index	Description of Service Rendered	Timekeeper	Hours	Fees	Sum	Circle Action			
		subpoenas; email correspondence with client regarding same								
12/08/23	9440957	Review and respond to correspondence from Receiver's office and co-counsel at GT regarding alleged objections to subpoenas and attend to related matters (0.5); follow-up inquiries to banks regarding pending productions (0.5).	Del Castillo, Joshua	1.00	545.00	57,105.00	WO	HD	TR	_____
12/08/23	9444130	Initial review of document productions from One Nevada Credit Union and PenFed Credit Union and email correspondence with client regarding same	Pham, Matt D.	0.50	222.50	57,327.50	WO	HD	TR	_____
12/11/23	9444450	Review detailed responses from Wells Fargo counsel regarding additional discovery requested by Receiver (0.5); legal analysis of issues presented (0.5); confer with M. Pham regarding same (0.3).	Del Castillo, Joshua	1.30	708.50	58,036.00	WO	HD	TR	_____
12/12/23	9445416	Emails with Receiver's office, defendants' counsel, and AM counsel regarding outstanding subpoenas and related matters (0.9).	Del Castillo, Joshua	0.90	490.50	58,526.50	WO	HD	TR	_____
12/12/23	9446054	Review correspondence and documents from J. McGraw regarding Judd account apparently not turned over (0.2); review prior turnover demands and subpoenas (0.5); correspondence with M. Pham regarding same (0.2).	Del Castillo, Joshua	0.90	490.50	59,017.00	WO	HD	TR	_____
12/12/23	9446231	Update the outgoing subpoena tracker and transmit revised version to M. Pham (1.0).	Robichaud, James	1.00	445.00	59,462.00	WO	HD	TR	_____

02/13/24 11:04:17 PROFORMA STATEMENT FOR MATTER 392775.00004 (Winkler, Geoff - Receiver for J&J Consul) (Investigation & Reporting)

Fees for Matter 392775.00004.(Investigation & Reporting)

Trans Date	Index	Description of Service Rendered	Timekeeper	Hours	Fees	Sum	Circle	Action		
12/12/23	9452088	Phone call with Citibank representative regarding new subpoena and follow up request on prior subpoena (0.2); Email correspondence with Washington Trust Bank representative regarding new subpoena (0.3); Email correspondence with Meadows Bank in-house counsel regarding withdrawal of subpoena (0.3)	Pham, Matt D.	0.80	356.00	59,818.00	WO	HD	TR	_____
12/13/23	9446852	Review pleadings in connection with asset turnover inquiry (0.6); emails with M. Pham regarding same (0.2); legal analysis regarding same (0.5).	Del Castillo, Joshua	1.30	708.50	60,526.50	WO	HD	TR	_____
12/13/23	9452096	Phone call with Chase Bank representative regarding follow-up requests on subpoena (0.1); Review prior turnover letter to Credit Union 1 and email correspondence with client regarding Judd Nevada Trust (0.4)	Pham, Matt D.	0.50	222.50	60,749.00	WO	HD	TR	_____
12/15/23	9449677	Review correspondence from Receiver's office regarding document productions (0.2); review notes regarding same (0.2); confer extensively with AM counsel (0.8); follow-up emails and voicemails to bank representatives (0.6); analysis for prospective meet and confer demand (0.5).	Del Castillo, Joshua	2.30	1,253.50	62,002.50	WO	HD	TR	_____
12/15/23	9452119	Initial review of document productions from Citibank, Discover Bank, Silver State Schools Credit Union (1.0); Confer with Josh del Castillo regarding outstanding requests from client relating to subpoenas (0.4)	Pham, Matt D.	1.40	623.00	62,625.50	WO	HD	TR	_____

02/13/24 11:04:17 PROFORMA STATEMENT FOR MATTER 392775.00004 (Winkler, Geoff - Receiver for J&J Consul) (Investigation & Reporting)

Fees for Matter 392775.00004.(Investigation & Reporting)

Trans Date	Index	Description of Service Rendered	Timekeeper	Hours	Fees	Sum	Circle	Action		
12/18/23	9452280	Emails and teleconferences with Receiver's office, D. Zaro, and M. Pham regarding pending or outstanding discovery and document recovery matters (1.5).	Del Castillo, Joshua	1.50	817.50	63,443.00	WO	HD	TR	_____
12/18/23	9453004	Update subpoena tracker per M. Pham and M. Pham, including subpoena follow-up letters (1.1).	Robichaud, James	1.10	489.50	63,932.50	WO	HD	TR	_____
12/18/23	9453553	Work with Receiver/counsel on the accounting and analysis of the discovery issues related to bank production and related emails.	Zaro, David	0.60	327.00	64,259.50	WO	HD	TR	_____
12/18/23	9458400	Phone call with Bank of America representative regarding additional subpoena and additional follow-up request (0.5); Email correspondence with Citibank representative regarding document production and cursory review of document production from Citibank (0.3)	Pham, Matt D.	0.80	356.00	64,615.50	WO	HD	TR	_____
12/19/23	9453750	Emails with M. Pham and J. Robichaud regarding pending discovery requests and subpoenas (0.5); attention to outstanding document request issues (0.5); correspondence to bank counsel regarding same (0.7).	Del Castillo, Joshua	1.70	926.50	65,542.00	WO	HD	TR	_____
12/19/23	9458407	Email correspondence with Grace Radke regarding timeline of subpoenas and document requests	Pham, Matt D.	0.70	311.50	65,853.50	WO	HD	TR	_____
12/20/23	9454841	Review correspondence from Receiver's office and confer with M. Pham regarding additional document subpoenas (0.5);	Del Castillo, Joshua	1.30	708.50	66,562.00	WO	HD	TR	_____

02/13/24 11:04:17 PROFORMA STATEMENT FOR MATTER 392775.00004 (Winkler, Geoff - Receiver for J&J Consul) (Investigation & Reporting)

Fees for Matter 392775.00004.(Investigation & Reporting)

Trans Date	Index	Description of Service Rendered	Timekeeper	Hours	Fees	Sum	Circle Action			
		review correspondence from U.S. Bank regarding same (0.4); review U.S. Bank documents and confer with M. Pham regarding additional discovery in connection with same (0.5).								
12/20/23	9458412	Prepare additional Wells Fargo subpoena and email correspondence with Wells Fargo's counsel regarding same (0.7); Review Grace Radke's email/documents regarding US Bank account and review and analyze US Bank's document production potentially relating to same (0.7); Confer with Josh del Castillo regarding US Bank documents and email correspondence and phone call with Joel Hammerman regarding US Bank accounts (0.6)Email correspondence with Grace Radke regarding explanation of misidentified US Bank account (0.4)	Pham, Matt D.	2.40	1,068.00	67,630.00	WO	HD	TR	_____
12/21/23	9455976	Follow-up with M. Pham regarding pending subpoenas and document requests and respond to inquiries regarding same (0.6).	Del Castillo, Joshua	0.60	327.00	67,957.00	WO	HD	TR	_____
12/21/23	9458415	Email correspondence with Grace Radke regarding Tanner accounts at various banks and review of subpoena spreadsheet	Pham, Matt D.	0.30	133.50	68,090.50	WO	HD	TR	_____
12/22/23	9458416	Email correspondence with Wells Fargo's counsel regarding supplemental production (0.2); Phone call with Bank of America representative regarding timing of supplemental production (0.2)	Pham, Matt D.	0.40	178.00	68,268.50	WO	HD	TR	_____

02/13/24 11:04:17 PROFORMA STATEMENT FOR MATTER 392775.00004 (Winkler, Geoff - Receiver for J&J Consul) (Investigation & Reporting)

Fees for Matter 392775.00004.(Investigation & Reporting)

Trans Date	Index	Description of Service Rendered	Timekeeper	Hours	Fees	Sum	Circle	Action		
12/22/23	9458418	Email correspondence with Grace Radke regarding status of Bank of America production	Pham, Matt D.	0.20	89.00	68,357.50	WO	HD	TR	_____
12/24/23	9459518	Legal analysis of prospective discovery meet and confer issue raised by Receiver's office and correspondence with AM counsel regarding same (2.5).	Del Castillo, Joshua	2.50	1,362.50	69,720.00	WO	HD	TR	_____
12/26/23	9459408	Follow-up emails to bank counsel regarding pending document production requests (0.5); emails to M. Pham regarding same (0.2).	Del Castillo, Joshua	0.70	381.50	70,101.50	WO	HD	TR	_____
12/26/23	9465111	Email correspondence with Grace Radke regarding Wells Fargo's supplemental document production	Pham, Matt D.	0.60	267.00	70,368.50	WO	HD	TR	_____
12/28/23	9461478	Attention to outstanding subpoenas and document requests (0.7); confer with M. Pham regarding same (0.3); review and respond to correspondence from bank counsel and representatives regarding same (0.6); review documents and correspondence with AM counsel regarding Receiver forensic accounting matters (1.0).	Del Castillo, Joshua	2.60	1,417.00	71,785.50	WO	HD	TR	_____
12/28/23	9465132	Phone call with Bank of America representative regarding status of supplemental production (0.1); Email correspondence with client's team regarding updates on productions from Bank of America, Wells Fargo, Bank of New York Mellon, Chase Bank (0.4)	Pham, Matt D.	0.50	222.50	72,008.00	WO	HD	TR	_____

02/13/24 11:04:17 PROFORMA STATEMENT FOR MATTER 392775.00004 (Winkler, Geoff - Receiver for J&J Consul) (Investigation & Reporting)

Fees for Matter 392775.00004.(Investigation & Reporting)

Trans Date	Index	Description of Service Rendered	Timekeeper	Hours	Fees	Sum	Circle	Action
12/29/23	9462062	Review documents in connection with Receiver's forensic analysis inquiry (1.2); emails with M. Pham regarding outstanding document productions (0.3).	Del Castillo, Joshua	1.50	817.50	72,825.50	WO	HD TR

Proforma Summary

Timekeeper

Number	Timekeeper	Hours	Rate	Amounts
000313	Zaro, David	11.80	545.00	6,431.00
001842	Del Castillo, Joshua	64.70	545.00	35,261.50
002307	Peng, Simona	0.90	350.00	315.00
002448	Neglia, Ross	4.90	350.00	1,715.00
002510	Pham, Matt D.	50.00	445.00	22,250.00
002592	Robichaud, James	15.40	445.00	6,853.00
				\$72,825.50
Subtotal Fees				\$72,825.50
Discount				0.00
Total Fees				72,825.50
Total Disbursements				0.00

Attorney Billing Instructions

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

Billing Instructions

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

Account Summary – As Of 02/01/24

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

02/13/24 11:04:17 PROFORMA STATEMENT FOR MATTER 392775.00004 (Winkler, Geoff - Receiver for J&J Consul) (Investigation & Reporting)

Worked	110,424.50	110,424.50	0.00	15,330.00	15,330.00	0.00	280,548.00	280,548.00	0.00
Unbilled Adj	807.50	807.50	0.00	0.00	0.00	0.00	5,335.00	5,335.00	0.00
Billed	57,921.50	57,921.50	0.00	0.00	0.00	0.00	187,057.50	187,057.50	0.00
Collected	57,921.50	57,921.50	0.00	0.00	0.00	0.00	187,057.50	187,057.50	0.00
AR Write Off	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00
	Total	Fees	Costs						
WIP	88,155.50	88,155.50	0.00						
Balance									
AR Balance	0.00	0.00	0.00						
Unalloc	0.00								
Payment									
Client Trust	0.00								
Balance									

Billing Address

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

02/13/24 11:04:19 PROFORMA STATEMENT FOR MATTER 392775.00006 (Winkler, Geoff - Receiver for J&J Consul) (Sale, Disposition & Transfer of Assets)

Preliminary Billing Form

Billing Atty: 001842 - Del Castillo, Matter #: 392775.00006 Client Name: Winkler, Geoff - Receiver for J&J Consul
 Joshua
 Date of Last Billing: 12/26/23 Matter Name: Sale, Disposition & Transfer of Assets
 Proforma Number: 1257810
 Client/Matter Joint Group # 392775.1 Client Matter Number:

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

Trans Date	Index	Description of Service Rendered	Timekeeper	Hours	Fees	Sum	Circle	Action
11/02/23	9401598	Review and respond to inquiries from Receiver's office regarding property sale/disposition matters and review associated documents (1.5); attention to and revise sale documents (0.9).	Del Castillo, Joshua	2.40	1,308.00	1,308.00	WO	HD TR

Proforma Summary

Timekeeper

Number	Timekeeper	Hours	Rate	Amounts
001842	Del Castillo, Joshua	2.40	545.00	1,308.00
		2.40		\$1,308.00
Subtotal Fees				\$1,308.00
Discount				0.00
Total Fees				1,308.00
Total Disbursements				0.00

Attorney Billing Instructions

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

Billing Instructions

02/13/24 11:04:19 PROFORMA STATEMENT FOR MATTER 392775.00006 (Winkler, Geoff - Receiver for J&J Consul) (Sale, Disposition & Transfer of Assets)

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

Account Summary – As Of 02/01/24

	Fiscal YTD			Calendar YTD			LTD		
	Total	Fees	Disb.	Total	Fees	Disb.	Total	Fees	Disbursements
Worked	2,348.00	2,348.00	0.00	327.00	327.00	0.00	153,030.50	153,030.50	0.00
Unbilled Adj	0.00	0.00	0.00	0.00	0.00	0.00	782.30	780.80	1.50
Billed	12,975.50	12,975.50	0.00	0.00	0.00	0.00	150,614.70	150,614.70	0.00
Collected	12,975.50	12,975.50	0.00	0.00	0.00	0.00	150,614.70	150,614.70	0.00
AR Write Off	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00
	Total	Fees	Costs						
WIP Balance	1,635.00	1,635.00	0.00						
AR Balance	0.00	0.00	0.00						
Unalloc Payment	0.00								
Client Trust Balance	0.00								

Billing Address

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

02/13/24 11:04:20 PROFORMA STATEMENT FOR MATTER 392775.00009 (Winkler, Geoff - Receiver for J&J Consul) (Third Party Claims & Recoveries)

Preliminary Billing FormBilling Atty: 001842 - Del Castillo,
Joshua

Matter #: 392775.00009

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

Date of Last Billing: 12/26/23

Matter Name: Third Party Claims & Recoveries

Proforma Number: 1257810

Client/Matter Joint Group # 392775.1

Client Matter Number:

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

Trans Date	Index	Description of Service Rendered	Timekeeper	Hours	Fees	Sum	Circle	Action		
11/15/23	9415774	Teleconference and emails with D. Zaro regarding EcoBattery claims and jurisdictional question arising in connection therewith (0.4); review draft memorandum and complaint (0.5); confer with M. Pham and J. Robichaud regarding same (0.2); legal analysis of related issues and transmit to D. Zaro for discussion (1.4).	Del Castillo, Joshua	2.50	1,362.50	1,362.50	WO	HD	TR	_____
11/23/23	9425024	Additional jurisdictional and standing analysis for prospective receivership claims and follow-up emails to AM counsel regarding same (1.4).	Del Castillo, Joshua	1.40	763.00	2,125.50	WO	HD	TR	_____
12/21/23	9456275	Review materials in connection with prospective EcoBattery claims (0.5).	Del Castillo, Joshua	0.50	272.50	2,398.00	WO	HD	TR	_____

Proforma Summary**Timekeeper**

Number	Timekeeper	Hours	Rate	Amounts
001842	Del Castillo, Joshua	4.40	545.00	2,398.00
		4.40		\$2,398.00
Subtotal Fees				\$2,398.00

02/13/24 11:04:20 PROFORMA STATEMENT FOR MATTER 392775.00009 (Winkler, Geoff - Receiver for J&J Consul) (Third Party Claims & Recoveries)

Proforma Summary

Timekeeper

Number	Timekeeper	Hours	Rate	Amounts
Discount				0.00
Total Fees				2,398.00
Total Disbursements				0.00

Attorney Billing Instructions

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

Billing Instructions

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

Account Summary – As Of 02/01/24

	Fiscal YTD			Calendar YTD			LTD		
	Total	Fees	Disb.	Total	Fees	Disb.	Total	Fees	Disbursements
Worked	4,954.00	4,954.00	0.00	327.00	327.00	0.00	91,690.50	91,690.50	0.00
Unbilled Adj	0.00	0.00	0.00	0.00	0.00	0.00	44.50	44.50	0.00
Billed	10,986.00	10,986.00	0.00	0.00	0.00	0.00	88,921.00	88,921.00	0.00
Collected	10,986.00	10,986.00	0.00	0.00	0.00	0.00	88,921.00	88,921.00	0.00
AR Write Off	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00
WIP	2,725.00	2,725.00	0.00						
Balance									
AR Balance	0.00	0.00	0.00						
Unalloc	0.00								
Payment									
Client Trust	0.00								
Balance									

Billing Address

Winkler, Geoff - Receiver for J&J Consulting Services, Inc.; J and J Purchasing LLC; The Judd Irrevocable Trust; BJ Holdings LLC

02/13/24 11:04:20 PROFORMA STATEMENT FOR MATTER 392775.00009 (Winkler, Geoff - Receiver for J&J Consul) (Third Party Claims & Recoveries)

Geoff B. Winkler
American Fiduciary Services LLC
715 NW Hoyt Street, Suite 4364
Portland, OR 97208

EXHIBIT 2

EXHIBIT 2

Statement

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

Date: 11/27/2023

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

Open Invoices Now Due \$16,376.80

Date	Open Invoice	Balance Remaining	Total Due
	7092-01 Receiver in Nevada Actions-		
07/11/2022	INV #7092-01_01. Orig. Amount \$7,006.50.	951.30	951.30
08/30/2022	INV #7092-01_02. Orig. Amount \$5,744.50.	1,148.90	2,100.20
09/30/2022	INV #7092-01_03. Orig. Amount \$4,357.50.	833.90	2,934.10
10/09/2022	INV #7092-01_04. Orig. Amount \$2,555.50.	511.10	3,445.20
11/29/2022	INV #7092-01_05. Orig. Amount \$1,960.86.	419.96	3,865.16
12/28/2022	INV #7092-01_06. Orig. Amount \$4,709.60.	1,097.84	4,963.00
01/07/2023	INV #7092-01_07. Orig. Amount \$1,931.50.	386.30	5,349.30
02/28/2023	INV #7092-01_08. Orig. Amount \$2,249.00.	449.80	5,799.10
03/29/2023	INV #7092-01_09. Orig. Amount \$1,946.00.	378.20	6,177.30
04/06/2023	INV #7092-01_10. Orig. Amount \$3,588.50.	717.70	6,895.00
05/16/2023	INV #7092-01_11. Orig. Amount \$3,021.50.	588.30	7,483.30
06/26/2023	INV #7092-01_12. Orig. Amount \$3,564.00.	550.62	8,033.92
07/07/2023	INV #7092-01_13. Orig. Amount \$1,515.50.	378.88	8,412.80
08/17/2023	INV #7092-01_14. Orig. Amount \$1,934.50.	1,934.50	10,347.30
09/20/2023	INV #7092-01_15. Orig. Amount \$3,520.50.	3,520.50	13,867.80
10/04/2023	INV #7092-01_16. Orig. Amount \$1,707.00.	1,707.00	15,574.80
11/25/2023	INV #7092-01_17. Orig. Amount \$802.00.	802.00	16,376.80

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 Federal I.D. # 27-4465751

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

Date 11/25/2023
 Invoice Number 7092-01_17
 Client Number 7092
 Matter Number 01

RE: Receiver in Nevada Actions

BILL THROUGH DATE 10/31/2023

Date	Employee	Description	Hours	Rate	Amount
10/1/2023	J Rickard	PROFESSIONAL FEES Conference call regarding Oberheiden request for additional time to respond to subpoena; emailing response to same	0.9	375.00	337.50
10/2/2023	O Kelly	Review e-mail from E Stepp re subpoena production (0.1) (2:22-cv-00612)	0.1	145.00	14.50
10/2/2023	J Rickard	Emailing with Oberheiden firm regarding volume and manner of production for response to subpoenas; emailing with co counsel regarding same	0.5	375.00	187.50
10/12/2023	J Rickard	Conference call with new counsel for Oberheiden firm regarding subpoena; emailing regarding same	0.4	375.00	150.00
10/16/2023	J Rickard	Emailing regarding Oberheiden subpoena and responsive documents	0.3	375.00	112.50
		Subtotal			802.00

Total Current Invoice \$802.00

Statement

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Date: 12/26/2023

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Open Invoices Now Due \$11,416.70

Date	Open Invoice	Balance Remaining	Total Due
	7092-01 Receiver in Nevada Actions-		
07/11/2022	INV #7092-01_01. Orig. Amount \$7,006.50.	951.30	951.30
08/30/2022	INV #7092-01_02. Orig. Amount \$5,744.50.	1,148.90	2,100.20
09/30/2022	INV #7092-01_03. Orig. Amount \$4,357.50.	833.90	2,934.10
10/09/2022	INV #7092-01_04. Orig. Amount \$2,555.50.	511.10	3,445.20
11/29/2022	INV #7092-01_05. Orig. Amount \$1,960.86.	419.96	3,865.16
12/28/2022	INV #7092-01_06. Orig. Amount \$4,709.60.	1,097.84	4,963.00
01/07/2023	INV #7092-01_07. Orig. Amount \$1,931.50.	386.30	5,349.30
02/28/2023	INV #7092-01_08. Orig. Amount \$2,249.00.	449.80	5,799.10
03/29/2023	INV #7092-01_09. Orig. Amount \$1,946.00.	378.20	6,177.30
04/06/2023	INV #7092-01_10. Orig. Amount \$3,588.50.	717.70	6,895.00
05/16/2023	INV #7092-01_11. Orig. Amount \$3,021.50.	588.30	7,483.30
06/26/2023	INV #7092-01_12. Orig. Amount \$3,564.00.	626.40	8,109.70
07/07/2023	INV #7092-01_13. Orig. Amount \$1,515.50.	303.10	8,412.80
08/17/2023	INV #7092-01_14. Orig. Amount \$1,934.50.	386.90	8,799.70
09/20/2023	INV #7092-01_15. Orig. Amount \$3,520.50.	704.10	9,503.80
10/04/2023	INV #7092-01_16. Orig. Amount \$1,707.00.	339.40	9,843.20
11/25/2023	INV #7092-01_17. Orig. Amount \$802.00.	802.00	10,645.20
12/12/2023	INV #7092-01_18. Orig. Amount \$771.50.	771.50	11,416.70

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 Receiver for J&J Consulting Services, Inc

Date 12/12/2023
 Invoice Number 7092-01_18
 Client Number 7092
 Matter Number 01

RE: Receiver in Nevada Actions

BILL THROUGH DATE 11/30/2023

Date	Employee	Description	Hours	Rate	Amount
11/7/2023	O Kelly	PROFESSIONAL FEES Review minute order re stay extended (0.1) (2:22-cv-00529-GMN-NJK - Wells Fargo Matter)	0.1	145.00	14.50
11/15/2023	J Rickard	Review order requiring joint discovery plan in Wells Fargo action	0.3	375.00	112.50
11/16/2023	A Barreras	Work on joint request to extend stay	0.9	145.00	130.50
11/16/2023	O Kelly	Review order directing filing of proposed discovery plan/scheduling order (2:23-cv-00703-GMN-NJK) (0.1)	0.1	145.00	14.50
11/17/2023	J Rickard	Review stipulation continuing discovery stay; emailing regarding same	0.3	375.00	112.50
11/17/2023	A Barreras	Review order granting motion to stay case	0.1	145.00	14.50
11/20/2023	O Kelly	Review minute orders re hearing scheduled for multiple motions (0.2) (22-cv-00612)	0.2	145.00	29.00
11/22/2023	O Kelly	Review order granting stipulation to continue hearing re Motion to Compel, [526] Motion, [531] Cross Motion to Stay Case (0.2) (22-cv-00612)	0.2	145.00	29.00
11/28/2023	J Rickard	Emailing regarding meet and confer for Oberheiden subpoena	0.3	375.00	112.50
11/28/2023	O Kelly	E-mails with J Rickard re new hearing date for various motions (0.2) (22-cv-00612)	0.1	145.00	14.50
11/29/2023	J Rickard	Prepare for and participate in meet and confer conference call regarding Oberheiden subpoena	0.5	375.00	187.50
		Subtotal			771.50

Total Current Invoice \$771.50

Statement

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Date: 1/8/2024

American Financial Services
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 Receiver for J&J Consulting Services, Inc

Open Invoices Now Due \$12,071.20

Date	Open Invoice	Balance Remaining	Total Due
	7092-01 Receiver in Nevada Actions-		
07/11/2022	INV #7092-01_01. Orig. Amount \$7,006.50.	951.30	951.30
08/30/2022	INV #7092-01_02. Orig. Amount \$5,744.50.	1,148.90	2,100.20
09/30/2022	INV #7092-01_03. Orig. Amount \$4,357.50.	833.90	2,934.10
10/09/2022	INV #7092-01_04. Orig. Amount \$2,555.50.	511.10	3,445.20
11/29/2022	INV #7092-01_05. Orig. Amount \$1,960.86.	261.20	3,706.40
12/28/2022	INV #7092-01_06. Orig. Amount \$4,709.60.	887.00	4,593.40
01/07/2023	INV #7092-01_07. Orig. Amount \$1,931.50.	368.90	4,962.30
02/28/2023	INV #7092-01_08. Orig. Amount \$2,249.00.	449.80	5,412.10
03/29/2023	INV #7092-01_09. Orig. Amount \$1,946.00.	378.20	5,790.30
04/06/2023	INV #7092-01_10. Orig. Amount \$3,588.50.	717.70	6,508.00
05/16/2023	INV #7092-01_11. Orig. Amount \$3,021.50.	588.30	7,096.30
06/26/2023	INV #7092-01_12. Orig. Amount \$3,564.00.	626.40	7,722.70
07/07/2023	INV #7092-01_13. Orig. Amount \$1,515.50.	303.10	8,025.80
08/17/2023	INV #7092-01_14. Orig. Amount \$1,934.50.	386.90	8,412.70
09/20/2023	INV #7092-01_15. Orig. Amount \$3,520.50.	704.10	9,116.80
10/04/2023	INV #7092-01_16. Orig. Amount \$1,707.00.	249.90	9,366.70
11/25/2023	INV #7092-01_17. Orig. Amount \$802.00.	802.00	10,168.70
12/12/2023	INV #7092-01_18. Orig. Amount \$771.50.	771.50	10,940.20
01/06/2024	INV #7092-01_19. Orig. Amount \$1,131.00.	1,131.00	12,071.20

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Date 1/6/2024
 Invoice Number 7092-01_19
 Client Number 7092
 Matter Number 01

RE: Receiver in Nevada Actions

BILL THROUGH DATE 12/31/2023

Date	Employee	Description	Hours	Rate	Amount
PROFESSIONAL FEES					
12/8/2023	J Rickard	Review supplemental production from Oberheiden firm	0.5	375.00	187.50
12/12/2023	O Kelly	Review USDC e-mails re updated time for hearing on 12/13/23 (22-cv-00612) (0.2)	0.2	145.00	29.00
12/12/2023	J Rickard	Review minute order resetting hearing; review motion for contempt	0.7	375.00	262.50
12/13/2023	J Rickard	Prepare for and attend status hearing	1.5	375.00	562.50
12/14/2023	O Kelly	Review minute order re 12/13/23 hearing outcome (0.1) (22-cv-00612)	0.1	145.00	14.50
12/18/2023	J Rickard	Review emailing regarding additional Oberheiden production	0.2	375.00	75.00
		Subtotal			1,131.00

Total Current Invoice \$1,131.00