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UNITED STATES DISTRICT COURT
DISTRICT OF NEVADA

SECURITIES AND EXCHANGE
COMMISSION,

Plaintiff,

vs.

MATTHEW WADE BEASLEY, *et al.*,

Defendants,

THE JUDD IRREVOCABLE TRUST, *et al.*,

Relief Defendants.

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

Judge Hon. Cristina D. Silva

**THIRTEENTH 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
RICKARD LAW**

[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 in the above-entitled action, and Semenza Rickard Law (formerly Semenza
 5 Kircher Rickard, "SR Law"), the Receiver's local counsel, hereby submit this Thirteenth Quarterly
 6 Application for Payment of Fees and Reimbursement of Expenses (this "Application").

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

13 **I. INTRODUCTION.**

14 Allen Matkins and SR Law serve as Court-approved counsel to the Receiver, who was
 15 appointed pursuant to this Court's June 5, 2022 *Order Appointing Receiver* (the "Appointment
 16 Order") [ECF No. 88], and whose appointment was reaffirmed via the Court's July 28, 2022 *Order*
 17 *Amending Receivership Order (Dkt. No. 88)* (the "Amended Appointment Order") [ECF No. 207].
 18 Pursuant to the terms of the Appointment Order and Amended Appointment Order, the Receiver is
 19 vested with authority and control over J&J Consulting Services, Inc., an Alaska corporation; J&J
 20 Consulting Services, Inc., a Nevada corporation; J and J Purchasing LLC; The Judd Irrevocable
 21 Trust; and BJ Holdings LLC, and over the Wells Fargo Interest on Lawyers' Trust Account ending
 22 in 5598 and held in the name of Beasley Law Group PC, along with the personal assets of certain
 23 individual defendants in the above-entitled action (all, collectively, the "Receivership Defendants")
 24 and authorized, subject to the approval of this Court, to "engage and employ persons in his discretion
 25 ... to assist him in carrying out his duties and responsibilities [as Receiver], including, but not
 26 limited to ... attorneys" and other professionals. (*See* Appointment Order at ¶ 7(F).)

27 This Application represents the thirteenth quarterly application for payment of fees and
 28 reimbursement of expenses submitted by Allen Matkins and SR Law in accordance with

Paragraph 62 of the Appointment Order, and covers the fees and expenses incurred by each of them between April 1, 2025 and June 30, 2025 (the "Application Period").

By way of this Application, Allen Matkins and SR Law request the Court's approval of 100% of their fees and expenses incurred during the Application Period, and further request the interim payment of 80% of such fees and 100% of such expenses, to be paid from the funds of the receivership estate established in the above-entitled action (the "Receivership Estate" or "Estate"). Specifically, the amounts of the Applicants' fees and expenses sought to be approved and paid 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	\$71,746.85	\$57,397.48	\$1,020.30	\$1,020.30
SR Law	\$1,769.50	\$1,415.60	\$0.00	\$0.00
<u>TOTAL:</u>	\$73,516.35	\$58,813.08	\$1,020.30	\$1,020.30

In accordance with the commitment made to the Receiver by Allen Matkins and SR Law in connection with their engagement in this matter, the fees identified above were billed at rates significantly discounted from Allen Matkins' and SR Law's standard hourly rates, reflecting discounts approaching 60% for certain timekeepers or submatters. Consistent with the SEC's billing guidelines, and Allen Matkins' and SR Law's commitment in this federal receivership, Allen Matkins and SR Law hereby request interim payment of only 80% of their respective fees, as noted above; the remaining, unpaid 20% "holdback" of Allen Matkins' and SR Law's approved fees will be subject to final approval and payment at the conclusion of the instant receivership. **In addition, as an accommodation to the Receivership Estate and in order to maintain a blended billing rate consistent with the goals of the present receivership, Allen Matkins has applied an across-the-board discount of an additional 5% to all attorneys' fees incurred during the Application Period.¹**

¹ Allen Matkins' aggregate fees without the application of the 5% discount totaled \$75,523.00 during the Application Period.

1 **II. GENERAL SUMMARY.**

2 During the Application Period, and with assistance from Allen Matkins and SR Law, the
3 Receiver made substantial progress on key elements of Estate administration, critically including
4 document recovery, review, and analysis, asset recovery and monetization, analysis of potential
5 claims against the Estate, and related claims administration, to say nothing of satisfying the
6 Receiver's ongoing obligations to report on his progress to this Court.

7 As reflected in prior applications for payment of fees and reimbursement of expenses in this
8 matter, the Receiver and his professionals have expended significant time and effort to preserve the
9 *status quo*, pursue the recovery of receivership assets, evaluate prospective creditor claims, and
10 continue efforts to obtain and analyze financial documents and other information critical to the
11 Receiver's administration of the Estate and forensic accounting. While a full accounting of the
12 Receiver's efforts and success is impracticable here, as reflected in the Receiver's interim reporting,
13 his asset recovery efforts have been remarkably successful. Indeed, as of the date of this
14 Application, the Receiver's efforts have resulted in the recovery of tens of millions of dollars in
15 assets – including, but not limited to, cash, financial instruments, vehicles, a private aircraft,
16 cryptocurrency, and real property.

17 As detailed further below, in coordination with Allen Matkins and SR Law, the Receiver has
18 continued to attend to critical case administration deadlines and other matters of importance to the
19 receivership, as well as his ongoing efforts to obtain and review essential documents relating to the
20 business and financial activities of the Receivership Defendants, and to recover assets subject to
21 turnover for the benefit of the Estate and its creditors.

22 Given the amount and significance of the work completed by Allen Matkins and SR Law,
23 and the significant benefit of their efforts to the Estate, Allen Matkins and SR Law respectfully
24 submit – as further detailed in the accompanying motion to approve the Application (filed under
25 separate cover in omnibus form) that the fees and expenses incurred during the Application Period
26 are reasonable and appropriate, and should be approved and paid, on an interim basis, in the amounts
27 indicated above. As an accommodation to the Estate, and consistent with the SEC's billing
28 guidelines and the ordinary practice in federal receiverships, Allen Matkins and SR Law request

1 that the Court approve 100% of the fees and expenses incurred during the Application Period but
 2 authorize payment, on an interim basis, of only 80% of such fees and 100% of such expenses, at this
 3 time.

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

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

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

13 **B. The Receiver's Retention Of SR Law.**

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

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

20 During the Application Period, Allen Matkins extensively assisted the Receiver in the
 21 performance of his duties under the Appointment Order, primarily by attending to matters critical
 22 to Receivership Estate administration, asset recovery and disposition, investigation and reporting,
 23 and the claims and distribution process.

24 In all, on account of its services rendered to the Receiver during the Application Period,
 25 Allen Matkins billed 141.4 hours and \$71,746.85 in fees, and incurred \$1,020.30 in expenses, across
 26 the following categories²:

28 ² As in prior applications, a limited number of Allen Matkins' entries reflect discussions

<u>Category</u>	<u>Hours</u>	<u>Fees</u>	<u>Expenses</u>
General Receivership	44.0	\$23,950.00	\$1,020.30
Asset Recovery & Management	10.3	\$5,533.50	\$0.00
Investigation & Reporting	11.4	\$6,163.00	\$0.00
Investor Issues & Communications	1.0	\$545.00	\$0.00
Sale, Disposition & Transfer of Assets	0.4	\$218.00	\$0.00
Pending Litigation	2.3	\$1,253.50	\$0.00
Claims & Distribution	71.6	\$37,682.00	\$0.00
Third Party Claims & Recoveries	0.4	\$178.00	\$0.00
<u>TOTAL:</u>	141.4	<u>\$75,523.00</u>	<u>\$1,020.30</u>
<u>FEE DISCOUNT APPLIED:</u>		(\$3,776.15)	
<u>TOTAL AFTER DISCOUNT</u>		<u>\$71,746.85</u>	

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

As it has since the inception of this matter, Allen Matkins endeavored to staff each task efficiently, using a core team of attorneys, with specialized assistance as necessary. As noted above, Allen Matkins agreed to a significant discount from its ordinary billing rates for this matter, as well as not to charge the Estate for any travel time associated with services provided to the Receiver. The fees identified below were billed at rates reflecting discounts approaching 60% for certain

between counsel. These entries include language referencing "advice to counsel", "confer with counsel", or similar discussions in connection with a particular issue. In accordance with applicable billing guidelines, such discussions have been kept to a minimum. Where they occur, Allen Matkins 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.

timekeepers, resulting in substantial savings for the Estate.³ In addition, and as noted above and further detailed in the Declarations submitted in support of this Application, Allen Matkins' fee and expense records were transmitted to the SEC for review on a monthly basis, and have drawn no objection. As the Court may recall, and as noted above, Allen Matkins has agreed to apply a line-item discount of 5% for the fees incurred during the Application Period, as an accommodation to the Receivership Estate.

1. General Receivership.

During the Application Period, Allen Matkins attorneys billed 44.5 hours to the "General Receivership" work category, largely in connection with matters relating to the Receiver's administration of the Estate or attending to administrative matters arising from the Receiver's obligations under the Appointment Order. Allen Matkins incurred \$1,020.30 in general expenses, consisting almost entirely of: (1) monthly fees for electronic document hosting and management services; and (2) costs associated with the service of subpoenas upon financial institutions and other parties in connection with the Receiver's ongoing investigation and forensic accounting. 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	43.7	\$23,816.50
Rachael Gonzales	Associate	\$445	0.3	\$133.50
<u>TOTAL:</u>			44.0	\$23,950.00

Work performed in this category generally related to critical case and Estate administration matters. During the Application Period, Allen Matkins personnel: (1) attended to outstanding case administration tasks; (2) with receivership co-counsel, assisted in the Receiver's administration of the Estate, including outstanding matters relating indirectly to reporting, forensic accounting, and analysis; (3) conferred with representatives of the United States Attorney's Office regarding its then-proposed intervention in the above-captioned action and addressed related matters; (4) addressing

³ Indeed, had Allen Matkins billed at its standard rates, its fees for the Application Period would be thousands of dollars more than the amount requested in the Application.

appellate issues related to this Court's prior findings of contempt against a third party; and (5) monitoring, reviewing, and analyzing pleadings filed in bankruptcy cases potentially implicating matters relevant to the receivership (the "Grigsby Bankruptcies"). These efforts have contributed to a streamlined case and Estate administration strategy and facilitated the Receiver's pursuit of his obligations to the Court and interested parties.

2. Asset Recovery & Management.

During the Application Period, Allen Matkins attorneys billed 10.3 hours to the "Asset Recovery & Management" work category. 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	9.5	\$5,177.50
Matthew Pham	Associate	\$445	0.8	\$356.00
<u>TOTAL:</u>			10.3	\$5,533.50

Work performed in this category generally related to the Receiver's continued efforts to recover from third parties assets subject to the turnover provisions of the Appointment Order and Amended Appointment Order, which require all third parties in possession of assets of the Receivership Defendants to turn such assets over to the Receiver, and to access frozen accounts. During the Application Period, Allen Matkins attorneys analyzed the Grigsby bankruptcies and conducted legal analysis for lien recordation for real properties and community property issues.

As noted above, these efforts have contributed to the Receiver's recovery of tens of millions of dollars in the form of cash, vehicles, a private aircraft, cryptocurrency, real property, and other assets for the benefit of the Estate and its creditors.

3. Investigation and Reporting.

During the Application Period, Allen Matkins attorneys billed 11.4 hours to the "Investigation & Reporting" work category.

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	10.9	\$5,940.50
Matthew Pham	Associate	\$445	0.5	\$222.50
<u>TOTAL:</u>			11.4	\$6,163.00

During the Application Period, the Receiver, with assistance from Allen Matkins, devoted significant attention to ongoing document recovery, review, and analysis efforts in connection with his forensic accounting and litigation goals, as well as attending to his Court-ordered reporting obligations.

At the Receiver's request, Allen Matkins engaged in extensive and ongoing efforts to recover documents critical to the Receiver's accounting, forensic accounting, and prospective litigation efforts. This included preparing follow-up requests for additional document productions from multiple third parties, including financial institutions, as the Receiver's accounting team identified deficiencies in existing document productions. Addressing these deficiencies required the Receiver's counsel to consult with counsel for subpoenaed entities to resolve related issues. In addition, Allen Matkins provided assistance to the Receiver in connection with his interim reports to the Court.

During the Application Period, Allen Matkins attorneys, among other things: (1) contributed to the preparation of the Receiver's interim report and conducted a detailed review of the status of ongoing discovery efforts in connection therewith; (2) continued to obtain and review document productions from multiple financial institutions received since the filing of the Receiver's most recent fee application; (3) continued the review of materials in connection with the Receiver's prosecution of claims against the bank (the "Wells Fargo Action") and other contemplated or prospective litigation; (4) attended to document production issues with subpoenaed financial institutions, including preparing additional subpoenas to such institutions following the analysis of produced documents and identifying deficiencies in productions; and (5) continued to perform analysis and pleading preparation in support of the Receiver's ongoing reporting obligations to the Court.

4. Investor Issues & Communications.

During the Application Period, Allen Matkins attorneys billed 1.0 hour to the "Investor Issues & Communications" work category.

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

<u>Timekeeper</u>	<u>Position</u>	<u>Hourly Rate</u>	<u>Hours</u>	<u>Fees</u>
Joshua del Castillo	Partner	\$545	1.0	\$545.00
<u>TOTAL:</u>			1.0	\$545.00

Work performed in this category primarily related to assisting the Receiver's office in addressing investor inquiries.

5. Sale, Disposition & Transfer of Assets.

During the Application Period, Allen Matkins attorneys billed 0.4 hours to the "Sale, Disposition & Transfer of Assets" work category.

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

<u>Timekeeper</u>	<u>Position</u>	<u>Hourly Rate</u>	<u>Hours</u>	<u>Fees</u>
Joshua del Castillo	Partner	\$545	0.4	\$218.00
<u>TOTAL:</u>			0.4	\$218.00

Work performed in this category related to the Receiver's ongoing asset disposition efforts, including with respect to some of the Estate's most valuable personal and real property. During the Application Period, Allen Matkins attorneys analyzed documents relating to a real property asset associated with certain of the Receivership Defendants.

6. Pending Litigation.

During the Application Period, Allen Matkins attorneys billed 2.3 hours to the "Pending Litigation" work category.

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	2.3	\$1,253.50
<u>TOTAL:</u>			2.3	\$1,253.50

Work performed in this category related to the analysis of expert testimony issues, pleadings, and other documents prepared and filed in connection with the Wells Fargo Action, and conferences with the Receiver's office and other receivership counsel regarding the Receiver's current and contemplated litigation efforts.

7. Claims & Distribution.

During the Application Period, Allen Matkins attorneys billed 71.6 hours to the "Claims & Distribution" work category.

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

<u>Timekeeper</u>	<u>Position</u>	<u>Hourly Rate</u>	<u>Hours</u>	<u>Fees</u>
David Zaro	Partner	\$545	0.8	\$436.00
Joshua del Castillo	Partner	\$545	57.4	\$31,283.00
Matthew Pham	Associate	\$445	2.4	\$1,068.00
Rachael Gonzales	Associate	\$445	11.0	\$4,895.00
<u>TOTAL:</u>			71.6	\$37,682.00

Work performed in this category related to the review of materials and legal analysis relating to prospective pre-receivership claims reflecting amounts potentially owed to former professionals engaged by the Receivership Defendants prior to the Receiver's appointment, as well as other third parties holding prospective claims against the Estate. This work also included drafting a motion regarding the Receiver's proposed claims procedures, discussions with co-counsel and the Receiver regarding the claims procedures, and conferring with prospective pre-receivership professionals regarding prospective claims. In addition, Allen Matkins provided assistance to the Receiver by identifying prospective non-investor claimants to conduct outreach to these potential claimants. Allen Matkins attorneys also drafted letters to identified pre-receivership professionals to solicit materials and information regarding their prospective claims. Further, Allen Matkins attorneys have reviewed submitted material and information from these pre-receivership professionals to begin to understand and develop an evaluation process of these prospective claims. As the Receiver has recovered tens of millions of dollars, Allen Matkins attorneys have begun to gather and assess

preliminary information as to the claims that exist, including those of pre-receivership professionals involved in the related involuntary bankruptcy case, to develop a framework to evaluate these claims. Allen Matkins attorneys have analyzed and conducted legal research to contemplate certain concepts from bankruptcy for potential incorporation and application in the claim evaluation process of these pre-receivership professionals.

8. Third Party Claims & Recoveries.

During the Application Period, Allen Matkins attorneys billed 0.4 hours to the "Third Party Claims & Recoveries" work category.

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>
Matthew Pham	Associate	\$445	0.4	\$178.00
<u>TOTAL:</u>			0.4	\$178.00

Work performed in this category related to conferring with co-counsel regarding one of the Grigsby bankruptcies.

IV. SERVICES RENDERED BY SR LAW DURING THE APPLICATION PERIOD.

During the Application Period, SR Law provided critical local counsel support to the Receiver, largely in connection with outstanding case administration deadlines, filings, and court proceedings. Among other things, SR Law ensured outstanding filing deadlines were satisfied, provided logistical support on matters arising in connection with the above-entitled matter and other related matters, and reviewed and assisted with the submission of the Receiver's filings in this matter.

A complete description of the services rendered by SR Law can be found in the invoices collectively appended hereto as **Exhibit B.**

By way of summary, SR Law attorneys and staff billed the following amounts each month during the Application Period:

<u>Month</u>	<u>Total Fees Billed</u>
April 2025	\$928.50
May 2025	\$188.50
June 2025	\$652.50
<u>TOTAL:</u>	\$1,769.50

V. THE FEES AND EXPENSES INCURRED ARE REASONABLE AND SHOULD BE ALLOWED.

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

As reflected in the Receiver's prior submissions to this Court, Allen Matkins and SR Law are providing an extremely high quality of work in a matter involving dozens of relevant parties and hundreds of millions of dollars in assets. Their efforts are bearing fruit: The Receiver has recovered tens of millions of dollars in personal and real property assets. He has consistently succeeded in securing necessary and appropriate relief from the Court, the turnover of cash and other assets, and the sales of personal and real property. Put simply, in a highly complex receivership, and while the Receiver continues to develop a comprehensive knowledge to understand the underlying facts, critical players, and assets, the Receiver – with the help of Allen Matkins and SR Law – is recovering millions of dollars in cash, obtaining the turnover of millions of dollars in personal and real property, and has already secured Court approval of and successfully undertaken procedures aimed at

monetizing those assets in a manner intended to maximize the recovery for the benefit of the Estate and creditors, including investors. The fees and expenses incurred by Allen Matkins and SR Law during the Application Period are minimal when compared to these results⁴, and Allen Matkins and SR Law respectfully request that the Court approve 100% of their fees and expenses, and also authorize the payment of those fees and expenses on a percentage, interim basis, as requested herein.

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

VI. CONCLUSION.

For the foregoing reasons, Allen Matkins and SR Law respectfully request that the Court enter an order:

1. Granting this Application in its entirety;
2. Approving Allen Matkins' discounted fees and expenses incurred during the Application Period, in the respective amounts of \$71,746.85 and \$1,020.30;
3. Authorizing the Receiver to pay Allen Matkins, on an interim basis, 80% of its approved fees incurred during the Application Period, in the amount of \$57,397.48, and 100% of its approved expenses incurred during the Application Period, in the amount of \$1,020.30, from the funds of the Receivership Estate;
4. Approving SR Law's fees incurred during the Application Period, in the amount of \$1,769.50;
5. Authorizing the Receiver to pay SR Law, on an interim basis, 80% of its approved fees incurred during the Application Period, in the amount of \$1,415.60; and
6. Providing such other and further relief as the Court deems just and proper.

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⁴ Indeed, the less than \$80,000.00 requested in this Application reflects a small fraction of the tens of millions in assets already recovered by the Receiver.

1 Dated: August 7, 2025

SEMENZA RICKARD LAW

/s/ Jarrod L. Rickard

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Attorneys for Receiver Geoff Winkler

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CERTIFICATE OF SERVICE

I am employed by the law firm of Semenza Rickard Law 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 7th day of August, 2025, I served the document(s), described as:

**THIRTEENTH 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 RICKARD LAW

**[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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9 Edward W. Cochran edward@edwcochran.com

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

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 12 kmilks@kcnvlaw.com

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 14 cpascal@wileypetersenlaw.com

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

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

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

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

21 Timothy C. Pittsenbarger chase@lcpfirm.com

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 rosehilla@gtlaw.com

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 24 crawforda@ballardspahr.com, lvdocket@ballardspahr.com

25 Sydney Gambia srgambia@hollandhart.com, intaketeam@hollandhart.com,
 26 jeheilich@hollandhart.com

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

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

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2 vlarsen@hollandhart.com

3 Alicia Baiardo abaiardo@mcguirewoods.com, JTabisaura@mcguirewoods.com

4 K. Issac deVyver kdevyver@mcguirewoods.com, hharding@mcguirewoods.com,
5 kfox@mcguirewoods.com, mkrizan@mcguirewoods.com

6 Celiza P. Braganca lisa@secdefenseattorney.com

7 David O'Toole david@secdefenseattorney.com

8 David C. Clukey dclukey@jacksonwhitelaw.com

9 Ori Katz okatz@sheppardmullin.com

10 Nicholas Boos nboos@maynardnexsen.com, bday@maynardnexsen.com,
11 gowens@maynardcooper.com, mdunn@maynardnexsen.com, sroberon@maynardnexsen.com,
12 ynesbitt@maynardnexsen.com

13 George W. Cochran, III lawchrist@gmail.com

14 Sidhardha Kamaraju skamaraju@pryorcashman.com, docketing@pryorcashman.com

15 Michael E. Welsh welshmi@sec.gov

16 John Giardino jgiardino@pryorcashman.com

17 David Baddley baddleyd@sec.gov

18 Kamille Dean Kamille@kamilledean.com

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

27 ☐ c. **BY PERSONAL SERVICE.**

28 ☐ 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 An Employee of Semenza Rickard Law
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EXHIBIT A

EXHIBIT A

07/28/25 10:40:24 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: 04/17/25

Matter Name: General Receivership

Proforma Number: 1344296

Client/Matter Joint Group # 392775.1

Client Matter Number:

Fees for Matter 392775.00002.(General Receivership)

Trans Date	Index	Description of Service Rendered	Timekeeper	Hours	Fees	Sum	Circle Action			
04/01/25	10012278	Review correspondence from defense counsel, GT co-counsel, and Receiver regarding request for briefing deadline extension (0.3); confer with D. Zaro and M. Pham regarding case administration matters (0.6).	Del Castillo, Joshua	0.90	490.50	490.50	WO	HD	TR	_____
04/03/25	10014734	Complete initial review of issues for discussion with Receiver and GT co-counsel (0.9); prepare for call (0.1).	Del Castillo, Joshua	1.00	545.00	1,035.50	WO	HD	TR	_____
04/04/25	10036741	Review recently filed pleadings (1.2); emails with AM counsel regarding case administration matters (0.5); emails to Receiver's office and GT co-counsel (0.3).	Del Castillo, Joshua	2.00	1,090.00	2,125.50	WO	HD	TR	_____
04/09/25	10021731	Review recent filings in receivership case and related Grigsby appeal (0.9).	Del Castillo, Joshua	0.90	490.50	2,616.00	WO	HD	TR	_____
04/10/25	10022852	Prepare for and attend videoconference with Receiver and GT co-counsel regarding case administration matters (0.7); review documents in connection with outstanding estate administration	Del Castillo, Joshua	1.80	981.00	3,597.00	WO	HD	TR	_____

07/28/25 10:40:24 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 matters in anticipation of upcoming hearing and prepare notes regarding same (1.1).	Timekeeper	Hours	Fees	Sum	Circle Action			
04/14/25	10025894	Review emails and pleadings, and attention to case administration matters (0.4).	Del Castillo, Joshua	0.40	218.00	3,815.00	WO	HD	TR	_____
04/15/25	10028808	Review Ninth Circuit Grigsby denial (0.1); review docket and outstanding appellate matters (0.4); Review materials, prepare for, and attend status conference and hearing on pending motions (1.5).	Del Castillo, Joshua	2.00	1,090.00	4,905.00	WO	HD	TR	_____
04/16/25	10029716	Attention to case administration matters (0.5); emails with AM counsel and Receiver's office regarding same (0.7).	Del Castillo, Joshua	1.20	654.00	5,559.00	WO	HD	TR	_____
04/17/25	10031088	Review orders (0.1); prepare for and videoconference with Receiver and GT co-counsel regarding case administration matters (0.5); attention to same (0.4).	Del Castillo, Joshua	1.00	545.00	6,104.00	WO	HD	TR	_____
04/18/25	10032392	Review recent court orders (0.1); emails with AM counsel regarding outstanding case administration matters (0.3); review and comment on draft order regarding stay and emails regarding same (0.4).	Del Castillo, Joshua	0.80	436.00	6,540.00	WO	HD	TR	_____
04/21/25	10035901	Attention to case administration matters and emails with Receiver's office and AM counsel regarding same (0.6); review appellate dockets and confer regarding Grigsby matter (0.3); emails regarding	Del Castillo, Joshua	1.10	599.50	7,139.50	WO	HD	TR	_____

07/28/25 10:40:24 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 proposed order with GT co-counsel and Receiver (0.2).	Timekeeper	Hours	Fees	Sum	Circle Action			
04/22/25	10036746	Emails with Receiver's office and GT co-counsel regarding draft order and other case administration matters (0.5).	Del Castillo, Joshua	0.50	272.50	7,412.00	WO	HD	TR	_____
04/23/25	10038313	Confer with M. Kebeh and attention to case administration matters (0.2).	Del Castillo, Joshua	0.20	109.00	7,521.00	WO	HD	TR	_____
04/24/25	10039674	Review materials, prepare for, and attend videoconference with Receiver and GT co-counsel regarding case administration matters (0.8).	Del Castillo, Joshua	0.80	436.00	7,957.00	WO	HD	TR	_____
04/28/25	10044273	Attention to and confer with M. Pham regarding pending case administration matters (0.4).	Del Castillo, Joshua	0.40	218.00	8,175.00	WO	HD	TR	_____
04/28/25	10048380	Email correspondence from internal team regarding potential claimants.	Gonzales, Rachael	0.30	133.50	8,308.50	WO	HD	TR	_____
04/29/25	10045511	Confer with D. Zaro and M. Pham regarding Gribgsy bankruptcy (0.5); review documents associated with Grigsby debt and conveyances and analysis of consumer bankruptcy issues (3.2); prepare for and teleconference with Receiver and GT co-counsel (0.5).	Del Castillo, Joshua	4.20	2,289.00	10,597.50	WO	HD	TR	_____
04/30/25	10048015	Attention to case administration matters and confer with P. Morris regarding same (0.3); review Grigsby-related materials (0.3).	Del Castillo, Joshua	0.60	327.00	10,924.50	WO	HD	TR	_____

07/28/25 10:40:24 PROFORMA STATEMENT FOR MATTER 392775.00002 (Winkler, Geoff - Receiver for J&J Consul) (General Receivership)

Fees for Matter 392775.00002.(General Receivership)

Trans Date	Index	Description of Service Rendered	Timekeeper	Hours	Fees	Sum	Circle	Action		
05/01/25	10092452	Review additional documents in connection with Grigsby bankruptcy (1.7); correspondence with AM counsel and GT co-counsel regarding same (0.4); prepare for and videoconference with Receiver and GT co-counsel regarding case administration matters (0.5).	Del Castillo, Joshua	2.60	1,417.00	12,341.50	WO	HD	TR	_____
05/03/25	10054396	Review and respond to correspondence regarding Grigsby bankruptcies (0.3); review documents in connection with same (0.3).	Del Castillo, Joshua	0.60	327.00	12,668.50	WO	HD	TR	_____
05/07/25	10058837	Review Grigsby bankruptcy motion for extension (0.1); emails with AM and GT co-counsel regarding same (0.5); analysis of propriety of requested extension (0.5).	Del Castillo, Joshua	1.10	599.50	13,268.00	WO	HD	TR	_____
05/08/25	10059850	Review and respond to correspondence from AM and GT co-counsel regarding Grigsby bankruptcy cases and confer with M. Pham regarding same (0.8); attend to various case administration matters and confer with AM counsel regarding same (0.9).	Del Castillo, Joshua	1.70	926.50	14,194.50	WO	HD	TR	_____
05/09/25	10060896	Emails regarding Grigsby bankruptcy (0.5).	Del Castillo, Joshua	0.50	272.50	14,467.00	WO	HD	TR	_____
05/12/25	10064920	Review and respond to correspondence from AM counsel (0.4); attention to case administration matters (0.4); review Grigsby notices (0.1); legal analysis regarding question presented in Grigsby	Del Castillo, Joshua	2.30	1,253.50	15,720.50	WO	HD	TR	_____

07/28/25 10:40:24 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			
		bankruptcy matter and teleconference with M. Pham regarding same (0.6); prepare for and teleconference with GT co-counsel regarding Grigsby bankruptcy (0.8).								
05/15/25	10068448	Review materials relating to Grigsby bankruptcies (1.9); prepare for and attend videoconference with Receiver and GT co-counsel (0.4); emails with AM counsel regarding case administration matters (0.3); teleconference regarding same (0.2).	Del Castillo, Joshua	2.80	1,526.00	17,246.50	WO	HD	TR	_____
05/19/25	10072144	Attention to case administration issues and confer with AM counsel regarding same (0.5).	Del Castillo, Joshua	0.50	272.50	17,519.00	WO	HD	TR	_____
05/26/25	10080231	Attention to case administration matters and emails to M. Pham regarding same (0.4).	Del Castillo, Joshua	0.40	218.00	17,737.00	WO	HD	TR	_____
05/28/25	10084308	Review district court and ninth circuit dockets and recent filings/orders (0.4); emails and confer with M. Pham regarding Grigsby bankruptcy cases (0.4); legal analysis in connection with same (1.1).	Del Castillo, Joshua	1.90	1,035.50	18,772.50	WO	HD	TR	_____
05/29/25	10086639	Prepare for and attend videoconference with Receiver and GT co-counsel (1.0).	Del Castillo, Joshua	1.00	545.00	19,317.50	WO	HD	TR	_____
06/02/25	10093549	Attention to case administration matters (0.2).	Del Castillo, Joshua	0.20	109.00	19,426.50	WO	HD	TR	_____

07/28/25 10:40:24 PROFORMA STATEMENT FOR MATTER 392775.00002 (Winkler, Geoff - Receiver for J&J Consul) (General Receivership)

Fees for Matter 392775.00002.(General Receivership)

Trans Date	Index	Description of Service Rendered	Timekeeper	Hours	Fees	Sum	Circle	Action		
06/04/25	10096630	Attention to case administration matters and correspondence with AM counsel regarding same (0.5); prepare update and email to Receiver and GT co-counsel in advance of status teleconference (0.3).	Del Castillo, Joshua	0.80	436.00	19,862.50	WO	HD	TR	_____
06/05/25	10112315	Emails with AM counsel regarding case administration matters (0.8); prepare and transmit update to client (0.3).	Del Castillo, Joshua	1.10	599.50	20,462.00	WO	HD	TR	_____
06/10/25	10103491	Attention to case administration matters and emails with Receiver's office and GT co-counsel regarding same (0.6).	Del Castillo, Joshua	0.60	327.00	20,789.00	WO	HD	TR	_____
06/12/25	10106161	Complete review of Grigsby bankruptcy submissions (1.2); emails and teleconferences with AM counsel and GT co-counsel (0.4).	Del Castillo, Joshua	1.60	872.00	21,661.00	WO	HD	TR	_____
06/16/25	10110846	Attention to case administration matters and emails with AM counsel regarding same (0.4).	Del Castillo, Joshua	0.40	218.00	21,879.00	WO	HD	TR	_____
06/18/25	10113472	Review and respond to emails from Receiver and GT co-counsel regarding case administration matters (0.5).	Del Castillo, Joshua	0.50	272.50	22,151.50	WO	HD	TR	_____
06/19/25	10114485	Review recent docket entries and attention to case management matters (0.5); prepare for and attend videoconference with Receiver and GT co-counsel (0.6).	Del Castillo, Joshua	1.10	599.50	22,751.00	WO	HD	TR	_____
06/25/25	10121850	Review recent Grigsby bankruptcy filings, including trustee's dismissal	Del Castillo, Joshua	1.10	599.50	23,350.50	WO	HD	TR	_____

07/28/25 10:40:24 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 recommendation (0.8); confer with AM counsel regarding same (0.3).	Timekeeper	Hours	Fees	Sum	Circle Action			
06/26/25	10123411	Prepare for and attend videoconference with Receiver and GT co-counsel regarding case administration matters (0.6); analysis of trustee position regarding dismissal of Grigsby bankruptcy (0.2).	Del Castillo, Joshua	0.80	436.00	23,786.50	WO	HD	TR	_____
06/30/25	10128454	Attention to case administration matters (0.3).	Del Castillo, Joshua	0.30	163.50	23,950.00	WO	HD	TR	_____

Disbursements for Matter 392775.00002 (General Receivership)

Trans Date	Index	Type	Quantity	Amt	Circle Action			
04/01/25	2931387	EDISC – CS Disco, Inc. - Monthly Hosting for April 2025	0.00	257.31	WO	HD	TR	_____
04/09/25	2931134	POS – Nationwide Legal, LLC - Citibank, N.A. - Subpoena to produce documents, information, or objects or to permit inspection of premises in a civil action; Notice of subpoena	0.00	197.40	WO	HD	TR	_____
04/09/25	2933325	POST – Postage-RICOH-1-Regular Env	0.00	0.97	WO	HD	TR	_____
04/16/25	2936279	POS – Service of Process - Nationwide Legal LLC -Citibank, N.A. - Subpoena Processing Unit,SUBPOENA TO PRODUCE DOCUMENTS, INFORMATION, OR OBJECTS OR TO PERMIT INSPECTION OF PREMISES IN A CIVIL ACTION; NOTICE OF SUBPOENA	0.00	50.00	WO	HD	TR	_____
05/01/25	2935674	EDISC – CS Disco, Inc. - Monthly Hosting for May 2025	0.00	257.31	WO	HD	TR	_____
06/01/25	2939992	EDISC – CS Disco, Inc. - Monthly Hosting for June 2025	0.00	257.31	WO	HD	TR	_____

07/28/25 10:40:24 PROFORMA STATEMENT FOR MATTER 392775.00002 (Winkler, Geoff - Receiver for J&J Consul) (General Receivership)

Proforma Summary**Timekeeper**

Number	Timekeeper	Hours	Rate	Amounts
001842	Del Castillo, Joshua	43.70	545.00	23,816.50
002744	Gonzales, Rachael	0.30	445.00	133.50
		<u>44.00</u>		<u>\$23,950.00</u>
Subtotal Fees				\$23,950.00
Discount				0.00
Total Fees				23,950.00
Total Disbursements				1,020.30

Attorney Billing Instructions

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

Billing Instructions

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

Account Summary – As Of 07/01/25

	Fiscal YTD			Calendar YTD			LTD		
	Total	Fees	Disb.	Total	Fees	Disb.	Total	Fees	Disbursements
Worked	10,532.66	10,454.00	78.66	53,695.30	52,675.00	1,020.30	335,490.16	296,909.50	38,580.66
Unbilled Adj	0.00	0.00	0.00	0.00	0.00	0.00	2,811.94	2,414.96	396.98
Billed	0.00	0.00	0.00	13,144.01	11,999.00	1,145.01	242,145.88	242,145.88	37,560.36
Collected	0.00	0.00	0.00	13,144.01	11,999.00	1,145.01	279,706.24	242,145.88	37,560.36
AR Write Off	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00
WIP	54,870.93	52,675.00	2,195.93						
Balance									
AR Balance	0.00	0.00	0.00						
Unalloc	0.00								
Payment									
Client Trust	0.00								
Balance									

07/28/25 10:40:24 PROFORMA STATEMENT FOR MATTER 392775.00002 (Winkler, Geoff - Receiver for J&J Consul) (General Receivership)

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

07/28/25 10:40:24 PROFORMA STATEMENT FOR MATTER 392775.00003 (Winkler, Geoff - Receiver for J&J Consul) (Asset Recovery & Management)

Preliminary Billing Form

Billing Atty: 001842 - Del Castillo,
Joshua

Matter #: 392775.00003

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

Date of Last Billing: 04/17/25

Matter Name: Asset Recovery & Management

Proforma Number: 1344296

Client/Matter Joint Group # 392775.1

Client Matter Number:

Fees for Matter 392775.00003.(Asset Recovery & Management)

Trans Date	Index	Description of Service Rendered	Timekeeper	Hours	Fees	Sum	Circle	Action		
04/07/25	10017764	Review documents regarding debtor's examination of Grigsby and confer with D. Zaro regarding same (0.2); review documents regarding Judd property and outstanding estate asset matters (0.8); emails to M. Pham regarding same (0.1).	Del Castillo, Joshua	1.10	599.50	599.50	WO	HD	TR	_____
04/12/25	10026712	Legal analysis of lien recordation and notice issue regarding Huntington property (1.1).	Del Castillo, Joshua	1.10	599.50	1,199.00	WO	HD	TR	_____
04/28/25	10050250	Review bankruptcy petitions filed by Grigsbies, and email correspondence with client and co-counsel regarding same (0.6); Cursory research regarding Nevada community property law to determine implication of two Grigsby bankruptcy estates (0.2)	Pham, Matt D.	0.80	356.00	1,555.00	WO	HD	TR	_____
05/01/25	10052781	Review documents in connection with remaining monetizable property assets (0.6); emails to AM counsel regarding same (0.2).	Del Castillo, Joshua	0.80	436.00	1,991.00	WO	HD	TR	_____

07/28/25 10:40:24 PROFORMA STATEMENT FOR MATTER 392775.00003 (Winkler, Geoff - Receiver for J&J Consul) (Asset Recovery & Management)

Fees for Matter 392775.00003.(Asset Recovery & Management)

Trans Date	Index	Description of Service Rendered	Timekeeper	Hours	Fees	Sum	Circle Action			
05/20/25	10074468	Review documents regarding outstanding real property assets (1.1); review documents regarding funds turned over from attorneys (0.8).	Del Castillo, Joshua	1.90	1,035.50	3,026.50	WO	HD	TR	_____
06/11/25	10105101	Review and respond to inquiry from Receiver's office regarding outreach to financial institutions regarding frozen accounts (0.2); review documents and correspondence in connection with same (1.3).	Del Castillo, Joshua	1.50	817.50	3,844.00	WO	HD	TR	_____
06/13/25	10107563	Review demand correspondence to and responses from banks and financial institutions from commencement of receivership to present at Receiver's request (2.3); attention to related turnover issues and emails with M. Pham regarding same (0.6); prepare email summary to Receiver's office (0.2).	Del Castillo, Joshua	3.10	1,689.50	5,533.50	WO	HD	TR	_____

Proforma Summary

Timekeeper Number	Timekeeper	Hours	Rate	Amounts
001842	Del Castillo, Joshua	9.50	545.00	5,177.50
002510	Pham, Matt D.	0.80	445.00	356.00
		<u>10.30</u>		<u>\$5,533.50</u>
Subtotal Fees				\$5,533.50
Discount				0.00
Total Fees				5,533.50
Total Disbursements				0.00

Attorney Billing Instructions

() BILL ALL () Hold

07/28/25 10:40:24 PROFORMA STATEMENT FOR MATTER 392775.00003 (Winkler, Geoff - Receiver for J&J Consul) (Asset Recovery & Management)

() 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 07/01/25

	Fiscal YTD			Calendar YTD			LTD		
	Total	Fees	Disb.	Total	Fees	Disb.	Total	Fees	Disbursements
Worked	0.00	0.00	0.00	9,185.00	9,185.00	0.00	267,036.50	267,036.50	0.00
Unbilled Adj	0.00	0.00	0.00	0.00	0.00	0.00	5,952.89	5,907.57	45.32
Billed	0.00	0.00	0.00	9,249.50	9,249.50	0.00	252,275.07	252,275.07	0.00
Collected	0.00	0.00	0.00	9,249.50	9,249.50	0.00	252,275.07	252,275.07	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	9,185.00	9,185.00	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

07/28/25 10:40:24 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: 04/17/25

Matter Name: Investigation & Reporting

Proforma Number: 1344296

Client/Matter Joint Group # 392775.1

Client Matter Number:

Fees for Matter 392775.00004.(Investigation & Reporting)

Trans Date	Index	Description of Service Rendered	Timekeeper	Hours	Fees	Sum	Circle	Action	
04/01/25	10018282	Confer with Josh del Castillo regarding forensic accounting report	Pham, Matt D.	0.30	133.50	133.50	WO	HD	TR
04/11/25	10047741	Follow-ups with AM counsel regarding outstanding discovery (0.5); review subpoena file and correspondence regarding outstanding productions (0.5).	Del Castillo, Joshua	1.00	545.00	678.50	WO	HD	TR
04/19/25	10034119	Emails regarding outstanding discovery matter (0.7); review email from Receiver's office regarding interim report (0.1); review notes of discussion regarding preparation of interim report (0.3).	Del Castillo, Joshua	1.10	599.50	1,278.00	WO	HD	TR
04/21/25	10035353	Review WF expert reports and related pleadings in connection with inquiry to special litigation counsel (1.4).	Del Castillo, Joshua	1.40	763.00	2,041.00	WO	HD	TR
04/23/25	10038705	Review draft summaries for interim report and confer regarding same (0.5).	Del Castillo, Joshua	0.50	272.50	2,313.50	WO	HD	TR
04/24/25	10039673	Confer with M. Pham regarding Receiver's outstanding discovery inquiry	Del Castillo, Joshua	0.40	218.00	2,531.50	WO	HD	TR

07/28/25 10:40:24 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 and status of productions (0.2); review follow-up production requests (0.2).	Timekeeper	Hours	Fees	Sum	Circle Action			
04/25/25	10040725	Review documents (0.4); review and respond to emails from Receiver's office and GT co-counsel regarding accounting workups (0.2).	Del Castillo, Joshua	0.60	327.00	2,858.50	WO	HD	TR	_____
04/25/25	10043957	Email correspondence with Jennifer Lloyd regarding status of outstanding productions	Pham, Matt D.	0.20	89.00	2,947.50	WO	HD	TR	_____
04/28/25	10044484	Follow-up regarding outstanding discovery and productions (0.5).	Del Castillo, Joshua	0.50	272.50	3,220.00	WO	HD	TR	_____
04/29/25	10046040	Review and respond to inquiry from Receiver's office regarding updated section for interim report and attention to issues regarding same (0.5).	Del Castillo, Joshua	0.50	272.50	3,492.50	WO	HD	TR	_____
04/30/25	10048006	Review draft documents from Receiver regarding draft interim report and related submissions (1.1); review and respond to emails regarding interim report (0.3).	Del Castillo, Joshua	1.40	763.00	4,255.50	WO	HD	TR	_____
05/05/25	10056265	Review and respond to correspondence regarding reporting inquiry (0.2) emails regarding follow-up subpoenas (0.2).	Del Castillo, Joshua	0.40	218.00	4,473.50	WO	HD	TR	_____
05/06/25	10057392	Review materials and follow-up emails with AM and bank counsel regarding document production inquiries (0.5).	Del Castillo, Joshua	0.50	272.50	4,746.00	WO	HD	TR	_____
05/13/25	10066416	Attention to accounting inquiry from Receiver's office and emails with Receiver and GT co-counsel regarding	Del Castillo, Joshua	0.40	218.00	4,964.00	WO	HD	TR	_____

07/28/25 10:40:24 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 same (0.4).	Timekeeper	Hours	Fees	Sum	Circle Action			
05/19/25	10073218	Attention to outstanding production inquiries and emails with AM counsel regarding same (0.4).	Del Castillo, Joshua	0.40	218.00	5,182.00	WO	HD	TR	_____
05/27/25	10084134	Review and respond to correspondence from GT co-counsel regarding third party demands for Receiver accounting analyses (0.3); attention to issues regarding same (0.2).	Del Castillo, Joshua	0.50	272.50	5,454.50	WO	HD	TR	_____
06/17/25	10111864	Review and respond to inquiries from Receiver's office regarding document recoveries (0.6); review files regarding same (0.3).	Del Castillo, Joshua	0.90	490.50	5,945.00	WO	HD	TR	_____
06/26/25	10123426	Review documents and analysis of document turnover / discovery question raised in call with Receiver and GT co-counsel (0.4).	Del Castillo, Joshua	0.40	218.00	6,163.00	WO	HD	TR	_____

Proforma Summary

Timekeeper		Hours	Rate	Amounts
Number	Timekeeper			
001842	Del Castillo, Joshua	10.90	545.00	5,940.50
002510	Pham, Matt D.	0.50	445.00	222.50
		11.40		\$6,163.00
Subtotal Fees				\$6,163.00
Discount				0.00
Total Fees				6,163.00
Total Disbursements				0.00

Attorney Billing Instructions

07/28/25 10:40:24 PROFORMA STATEMENT FOR MATTER 392775.00004 (Winkler, Geoff - Receiver for J&J Consul) (Investigation & Reporting)

()	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
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Account Summary – As Of 07/01/25

	Fiscal YTD			Calendar YTD			LTD		
	Total	Fees	Disb.	Total	Fees	Disb.	Total	Fees	Disbursements
Worked	361.50	361.50	0.00	25,612.50	25,612.50	0.00	374,011.50	374,011.50	0.00
Unbilled Adj	0.00	0.00	0.00	0.00	0.00	0.00	6,444.22	6,444.22	0.00
Billed	0.00	0.00	0.00	12,795.80	12,795.80	0.00	342,132.78	342,132.78	0.00
Collected	0.00	0.00	0.00	12,795.80	12,795.80	0.00	342,132.78	342,132.78	0.00
AR Write Off	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00
WIP	25,612.50	25,612.50	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
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07/28/25 10:40:24 PROFORMA STATEMENT FOR MATTER 392775.00005 (Winkler, Geoff - Receiver for J&J Consul) (Investor Issues & Communications)

Preliminary Billing FormBilling Atty: 001842 - Del Castillo,
Joshua

Matter #: 392775.00005

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

Date of Last Billing: 06/01/24

Matter Name: Investor Issues & Communications

Proforma Number: 1344296

Client/Matter Joint Group # 392775.1

Client Matter Number:

Fees for Matter 392775.00005.(Investor Issues & Communications)

Trans Date	Index	Description of Service Rendered	Timekeeper	Hours	Fees	Sum	Circle	Action	
05/07/25	10058906	Review and respond to correspondence regarding third party outreach to investors (0.2).	Del Castillo, Joshua	0.20	109.00	109.00	WO	HD	TR
06/10/25	10103594	Review correspondence from Receiver's office and GT co-counsel regarding prospective responses to inquiries from investors (0.2); attend to voicemail inquiries from purported investor representative (0.6).	Del Castillo, Joshua	0.80	436.00	545.00	WO	HD	TR

Proforma Summary

Timekeeper Number	Timekeeper	Hours	Rate	Amounts
001842	Del Castillo, Joshua	1.00	545.00	545.00
		1.00		\$545.00
Subtotal Fees				\$545.00
Discount				0.00
Total Fees				545.00
Total Disbursements				0.00

Attorney Billing Instructions

07/28/25 10:40:24 PROFORMA STATEMENT FOR MATTER 392775.00005 (Winkler, Geoff - Receiver for J&J Consul) (Investor Issues & Communications)

()	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
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Account Summary – As Of 07/01/25

	Fiscal YTD			Calendar YTD			LTD		
	Total	Fees	Disb.	Total	Fees	Disb.	Total	Fees	Disbursements
Worked	0.00	0.00	0.00	1,035.50	1,035.50	0.00	7,632.00	7,632.00	0.00
Unbilled Adj	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00
Billed	0.00	0.00	0.00	0.00	0.00	0.00	6,596.50	6,596.50	0.00
Collected	0.00	0.00	0.00	0.00	0.00	0.00	6,596.50	6,596.50	0.00
AR Write Off	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00
WIP	1,035.50	1,035.50	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
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07/28/25 10:40:24 PROFORMA STATEMENT FOR MATTER 392775.00006 (Winkler, Geoff - Receiver for J&J Consul) (Sale, Disposition & Transfer of Assets)

Preliminary Billing FormBilling Atty: 001842 - Del Castillo,
Joshua

Matter #: 392775.00006

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

Date of Last Billing: 12/20/24

Matter Name: Sale, Disposition & Transfer of Assets

Proforma Number: 1344296

Client/Matter Joint Group # 392775.1

Client Matter Number:

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

Trans Date	Index	Description of Service Rendered	Timekeeper	Hours	Fees	Sum	Circle	Action	
04/22/25	10037099	Review documents in connection with real property disposition matters (0.4).	Del Castillo, Joshua	0.40	218.00	218.00	WO	HD	TR

Proforma Summary**Timekeeper**

Number	Timekeeper	Hours	Rate	Amounts
001842	Del Castillo, Joshua	0.40	545.00	218.00
		0.40		\$218.00
Subtotal Fees				\$218.00
Discount				0.00
Total Fees				218.00
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

07/28/25 10:40:24 PROFORMA STATEMENT FOR MATTER 392775.00006 (Winkler, Geoff - Receiver for J&J Consul) (Sale, Disposition & Transfer of Assets)

Account Summary – As Of 07/01/25

	Fiscal YTD			Calendar YTD			LTD		
	Total	Fees	Disb.	Total	Fees	Disb.	Total	Fees	Disbursements
Worked	0.00	0.00	0.00	981.00	981.00	0.00	158,475.00	158,475.00	0.00
Unbilled Adj	0.00	0.00	0.00	0.00	0.00	0.00	782.30	780.80	1.50
Billed	0.00	0.00	0.00	0.00	0.00	0.00	156,713.20	156,713.20	0.00
Collected	0.00	0.00	0.00	0.00	0.00	0.00	156,713.20	156,713.20	0.00
AR Write Off	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00
<i>WIP</i>	<i>Total</i>	<i>Fees</i>	<i>Costs</i>						
<i>Balance</i>	<i>981.00</i>	<i>981.00</i>	<i>0.00</i>						
<i>AR Balance</i>	<i>0.00</i>	<i>0.00</i>	<i>0.00</i>						
<i>Unalloc</i>	<i>0.00</i>								
<i>Payment</i>									
<i>Client Trust</i>	<i>0.00</i>								
<i>Balance</i>									

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

07/28/25 10:40:24 PROFORMA STATEMENT FOR MATTER 392775.00007 (Winkler, Geoff - Receiver for J&J Consul) (Pending Litigation)

Preliminary Billing FormBilling Atty: 001842 - Del Castillo,
Joshua

Matter #: 392775.00007

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

Date of Last Billing: 09/20/24

Matter Name: Pending Litigation

Proforma Number: 1344296

Client/Matter Joint Group # 392775.1

Client Matter Number:

Fees for Matter 392775.00007.(Pending Litigation)

Trans Date	Index	Description of Service Rendered	Timekeeper	Hours	Fees	Sum	Circle	Action	
05/08/25	10059845	Review draft motion and declaration circulated by special litigation counsel in connection with Daubert expert disqualification and prepare proposed revisions to same (1.5); emails with Receiver and GT co-counsel regarding same (0.3).	Del Castillo, Joshua	1.80	981.00	981.00	WO	HD	TR
05/09/25	10060883	Review and respond to correspondence regarding special litigation counsel briefing (0.5).	Del Castillo, Joshua	0.50	272.50	1,253.50	WO	HD	TR

Proforma Summary

Timekeeper Number	Timekeeper	Hours	Rate	Amounts
001842	Del Castillo, Joshua	2.30	545.00	1,253.50
		2.30		\$1,253.50
Subtotal Fees				\$1,253.50
Discount				0.00
Total Fees				1,253.50
Total Disbursements				0.00

Attorney Billing Instructions

07/28/25 10:40:24 PROFORMA STATEMENT FOR MATTER 392775.00007 (Winkler, Geoff - Receiver for J&J Consul) (Pending Litigation)

()	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 07/01/25

	Fiscal YTD			Calendar YTD			LTD		
	Total	Fees	Disb.	Total	Fees	Disb.	Total	Fees	Disbursements
Worked	1,308.00	1,308.00	0.00	3,924.00	3,924.00	0.00	30,947.00	30,947.00	0.00
Unbilled Adj	0.00	0.00	0.00	0.00	0.00	0.00	623.00	623.00	0.00
Billed	0.00	0.00	0.00	0.00	0.00	0.00	26,400.00	26,400.00	0.00
Collected	0.00	0.00	0.00	0.00	0.00	0.00	26,400.00	26,400.00	0.00
AR Write Off	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00
WIP	3,924.00	3,924.00	0.00						
Balance									
AR Balance	0.00	0.00	0.00						
Unalloc	0.00								
Payment									
Client Trust	0.00								
Balance									

Billing Address

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

07/28/25 10:40:24 PROFORMA STATEMENT FOR MATTER 392775.00008 (Winkler, Geoff - Receiver for J&J Consul) (Claims & Distribution)

Preliminary Billing FormBilling Atty: 001842 - Del Castillo,
Joshua

Matter #: 392775.00008

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

Date of Last Billing: 04/17/25

Matter Name: Claims & Distribution

Proforma Number: 1344296

Client/Matter Joint Group # 392775.1

Client Matter Number:

Fees for Matter 392775.00008.(Claims & Distribution)

Trans Date	Index	Description of Service Rendered	Timekeeper	Hours	Fees	Sum	Circle	Action	
04/01/25	10012350	Review and respond to correspondence from Receiver and GT co-counsel regarding prospective claims process (0.2); review and assemble documents in connection with anticipated draft motion regarding same (1.1).	Del Castillo, Joshua	1.30	708.50	708.50	WO	HD	TR
04/02/25	10013649	Additional analysis of prospective claims issues arising in connection with pre-receivership professional claimants (0.9); analysis of prospective differential tranced claims (0.5).	Del Castillo, Joshua	1.40	763.00	1,471.50	WO	HD	TR
04/08/25	10020464	Review documents regarding claims issues in anticipation of Receiver call (0.6); complete additional legal analysis in connection with same (0.8); email to M. Pham regarding pre-receivership professional/admin creditors (0.1).	Del Castillo, Joshua	1.50	817.50	2,289.00	WO	HD	TR
04/09/25	10021578	Prepare for and videoconference with Receiver and GT co-counsel regarding anticipated claims process and related motions (0.9); attention to claims issues	Del Castillo, Joshua	2.10	1,144.50	3,433.50	WO	HD	TR

07/28/25 10:40:24 PROFORMA STATEMENT FOR MATTER 392775.00008 (Winkler, Geoff - Receiver for J&J Consul) (Claims & Distribution)

Fees for Matter 392775.00008.(Claims & Distribution)

Trans Date	Index	Description of Service Rendered and confer with AM counsel regarding notification correspondence (1.0); emails with Receiver's office (0.2).	Timekeeper	Hours	Fees	Sum	Circle Action			
04/09/25	10027063	Confer with Josh del Castillo regarding notices to pre-receivership estate professionals and non-investors re claims	Pham, Matt D.	0.30	133.50	3,567.00	WO	HD	TR	_____
04/10/25	10022545	Confer with M. Pham regarding issues arising in connection with potential pre-receivership claims (0.2); additional analysis in connection with same (0.5); prepare template notice letters (1.3).	Del Castillo, Joshua	2.00	1,090.00	4,657.00	WO	HD	TR	_____
04/10/25	10023682	Conference with counsel related to the Receiver's claims process, the net winner claimants and advice concerning claims, forms, letters and follow up thereon.	Zaro, David	0.40	218.00	4,875.00	WO	HD	TR	_____
04/11/25	10023702	Attention to claim demand letters and confer with AM counsel regarding same (0.9); review pre-receivership dockets in connection with prospective claims (1.1); prepare inquiries to Receiver's office and GT co-counsel regarding same (0.5).	Del Castillo, Joshua	2.50	1,362.50	6,237.50	WO	HD	TR	_____
04/11/25	10027086	Review draft of letter to prospective claimants and provide comments relating thereto	Pham, Matt D.	0.20	89.00	6,326.50	WO	HD	TR	_____
04/14/25	10026985	Emails with GT co-counsel and Receiver's office regarding pre-receivership professional claims and attention to issues regarding same (0.5);	Del Castillo, Joshua	1.70	926.50	7,253.00	WO	HD	TR	_____

07/28/25 10:40:24 PROFORMA STATEMENT FOR MATTER 392775.00008 (Winkler, Geoff - Receiver for J&J Consul) (Claims & Distribution)

Fees for Matter 392775.00008.(Claims & Distribution)

Trans Date	Index	Description of Service Rendered	Timekeeper	Hours	Fees	Sum	Circle Action			
		legal analysis of claims issue raised in connection with same (1.2).								
04/17/25	10031319	Review correspondence from GT-co counsel and Receiver regarding claims matters (0.3); analysis of issues raised in same (0.4); review correspondence to prospective pre-receivership professional claimants (0.7).	Del Castillo, Joshua	1.40	763.00	8,016.00	WO	HD	TR	_____
04/18/25	10032499	Emails and confer with AM counsel regarding claims matters (0.8); legal analysis regarding subordination issue (0.5).	Del Castillo, Joshua	1.30	708.50	8,724.50	WO	HD	TR	_____
04/18/25	10035339	Review J&J bankruptcy case dockets and pull information regarding all pre-receivership professionals	Pham, Matt D.	1.70	756.50	9,481.00	WO	HD	TR	_____
04/19/25	10034127	Prepare notes for discussion with AM counsel regarding additional claims inquiry raised by Receiver (0.5); legal analysis regarding same (0.8).	Del Castillo, Joshua	1.30	708.50	10,189.50	WO	HD	TR	_____
04/21/25	10035181	Revise draft claims form letters (0.6); confer with AM counsel (0.3).	Del Castillo, Joshua	0.90	490.50	10,680.00	WO	HD	TR	_____
04/22/25	10037061	Follow-up regarding claims matters to Receiver and AM counsel (0.8); review emails from Receiver's office regarding identified prospective pre-receivership claimants and attention to issues regarding same (0.5).	Del Castillo, Joshua	1.30	708.50	11,388.50	WO	HD	TR	_____
04/23/25	10038331	Review emails from Receiver's office regarding prospective claimants and	Del Castillo, Joshua	0.70	381.50	11,770.00	WO	HD	TR	_____

07/28/25 10:40:24 PROFORMA STATEMENT FOR MATTER 392775.00008 (Winkler, Geoff - Receiver for J&J Consul) (Claims & Distribution)

Fees for Matter 392775.00008.(Claims & Distribution)

Trans Date	Index	Description of Service Rendered	Timekeeper	Hours	Fees	Sum	Circle Action			
		review documents in connection with same (0.7).								
04/24/25	10039630	Emails with AM counsel regarding claims issues (0.5); legal analysis of issue raised by Receiver (0.8).	Del Castillo, Joshua	1.30	708.50	12,478.50	WO	HD	TR	_____
04/28/25	10043346	Review emails from Receiver's office and AM counsel regarding claims issues (0.5); confer with R. Gonzales regarding same (0.5); finalize and transmit draft notice letter (0.3).	Del Castillo, Joshua	1.30	708.50	13,187.00	WO	HD	TR	_____
04/29/25	10046055	Review and respond to correspondence from Receiver's office and GT co-counsel regarding investor claims inquiries (0.3).	Del Castillo, Joshua	0.30	163.50	13,350.50	WO	HD	TR	_____
04/29/25	10048352	Drafting correspondence to potential claimants.	Gonzales, Rachael	1.70	756.50	14,107.00	WO	HD	TR	_____
04/29/25	10048357	Identifying potential claimants for the receivership.	Gonzales, Rachael	4.00	1,780.00	15,887.00	WO	HD	TR	_____
04/29/25	10050292	Review final drafts of letters to pre-receivership professionals regarding claims	Pham, Matt D.	0.20	89.00	15,976.00	WO	HD	TR	_____
04/30/25	10047057	Review emails and attention to claims issues (0.5); review voicemails from and teleconference with prospective pre-receivership professional claimants (0.7).	Del Castillo, Joshua	1.20	654.00	16,630.00	WO	HD	TR	_____
04/30/25	10048339	Identifying potential claimants in the receivership.	Gonzales, Rachael	2.80	1,246.00	17,876.00	WO	HD	TR	_____

07/28/25 10:40:24 PROFORMA STATEMENT FOR MATTER 392775.00008 (Winkler, Geoff - Receiver for J&J Consul) (Claims & Distribution)

Fees for Matter 392775.00008.(Claims & Distribution)

Trans Date	Index	Description of Service Rendered	Timekeeper	Hours	Fees	Sum	Circle	Action		
05/02/25	10053582	Additional legal analysis regarding prospective subordination issue (0.8); review and respond to claims correspondence (0.3).	Del Castillo, Joshua	1.10	599.50	18,475.50	WO	HD	TR	_____
05/03/25	10054398	Review and respond to correspondence from Receiver's office and AM counsel regarding claims issues (0.6); attention to status of claim letters to pre-receivership prospective creditors (0.4); correspondence regarding same (0.2).	Del Castillo, Joshua	1.20	654.00	19,129.50	WO	HD	TR	_____
05/06/25	10059035	Review documents and emails regarding prospective claim submission and emails regarding same (0.9).	Del Castillo, Joshua	0.90	490.50	19,620.00	WO	HD	TR	_____
05/08/25	10060081	Review pre-claim submissions by certain anticipated pre-receivership creditors (0.9); legal analysis of inquiry raised in connection with prospective claim (0.7).	Del Castillo, Joshua	1.60	872.00	20,492.00	WO	HD	TR	_____
05/08/25	10062853	Continue identifying potential claimants.	Gonzales, Rachael	1.00	445.00	20,937.00	WO	HD	TR	_____
05/09/25	10060238	Review supplemental summary of prospective pre-receivership claimants and compare as against notes and Receiver listing (0.9); confer with R. Gonzales regarding same (0.2); prepare update and recommendation to Receiver regarding same (0.5).	Del Castillo, Joshua	1.60	872.00	21,809.00	WO	HD	TR	_____
05/12/25	10063361	Emails and confer with R. Gonzales regarding additional claims letters (0.5); attention to issues regarding same (0.3); emails to Receiver's office (0.2).	Del Castillo, Joshua	1.00	545.00	22,354.00	WO	HD	TR	_____

07/28/25 10:40:24 PROFORMA STATEMENT FOR MATTER 392775.00008 (Winkler, Geoff - Receiver for J&J Consul) (Claims & Distribution)

Fees for Matter 392775.00008.(Claims & Distribution)

Trans Date	Index	Description of Service Rendered	Timekeeper	Hours	Fees	Sum	Circle Action			
05/12/25	10063717	Email correspondence to J. McGraw regarding schedules for potential claims.	Gonzales, Rachael	0.10	44.50	22,398.50	WO	HD	TR	_____
05/12/25	10066113	Review internal schedules from J. McGraw regarding potential claimants.	Gonzales, Rachael	0.20	89.00	22,487.50	WO	HD	TR	_____
05/13/25	10066110	Email correspondence with J. del Castillo regarding correspondence to send regarding potential claimants.	Gonzales, Rachael	0.20	89.00	22,576.50	WO	HD	TR	_____
05/13/25	10066299	Review claims-related submissions (0.7); emails to/from submitting parties (0.7); emails to Receiver's office (0.3); emails with AM counsel regarding additional claims letters (0.3).	Del Castillo, Joshua	2.00	1,090.00	23,666.50	WO	HD	TR	_____
05/13/25	10066415	Draft correspondence to potential claimants regarding potential claims.	Gonzales, Rachael	1.00	445.00	24,111.50	WO	HD	TR	_____
05/17/25	10072458	Prepare claim subordination (0.9).	Del Castillo, Joshua	0.90	490.50	24,602.00	WO	HD	TR	_____
05/19/25	10072601	Review additional claims letters and confer regarding same (0.6).	Del Castillo, Joshua	0.60	327.00	24,929.00	WO	HD	TR	_____
05/21/25	10076483	Emails regarding additional claims letters (0.3); review documents in connection with same (0.6).	Del Castillo, Joshua	0.90	490.50	25,419.50	WO	HD	TR	_____
05/22/25	10077806	Emails and teleconferences with prospective pre-receivership claimants and prepare notes for discussion with Receiver regarding same (0.7).	Del Castillo, Joshua	0.70	381.50	25,801.00	WO	HD	TR	_____

07/28/25 10:40:24 PROFORMA STATEMENT FOR MATTER 392775.00008 (Winkler, Geoff - Receiver for J&J Consul) (Claims & Distribution)

Fees for Matter 392775.00008.(Claims & Distribution)

Trans Date	Index	Description of Service Rendered	Timekeeper	Hours	Fees	Sum	Circle	Action	
05/25/25	10080155	Review documents in connection with pre-receivership professional prospective claims and prepare notes for discussion with AM counsel (1.7).	Del Castillo, Joshua	1.70	926.50	26,727.50	WO	HD	TR
05/27/25	10081979	Teleconference with A. Agelakopoulos regarding pre-receivership prospective claim (0.3); review documents and confer with M. Pham and R. Gonzales regarding same (0.7); attention to claims issues (0.5).	Del Castillo, Joshua	1.50	817.50	27,545.00	WO	HD	TR
05/29/25	10086635	Review pre-receivership prospective claim submission and review R. Gonzales analysis of necessary elements to prevail on "substantial contribution" claim (1.5); additional analysis on related procedural issues (0.7); prepare notes for discussion with Receiver (0.4); emails to Receiver and GT co-counsel (0.2).	Del Castillo, Joshua	2.80	1,526.00	29,071.00	WO	HD	TR
05/30/25	10088796	Review notes from discussion with Receiver and legal analysis of unusual claims issue associated with "in kind" investments (1.7); attention to issues regarding threatened motion to approve substantial contribution claim and legal analysis of additional case law (1.2).	Del Castillo, Joshua	2.90	1,580.50	30,651.50	WO	HD	TR
06/02/25	10093552	Email to A. Agelakopoulos regarding pre-receivership claim inquiry (0.3); confer with M. Pham regarding same (0.2); attention to claims issues (1.2).	Del Castillo, Joshua	1.70	926.50	31,578.00	WO	HD	TR

07/28/25 10:40:24 PROFORMA STATEMENT FOR MATTER 392775.00008 (Winkler, Geoff - Receiver for J&J Consul) (Claims & Distribution)

Fees for Matter 392775.00008.(Claims & Distribution)

Trans Date	Index	Description of Service Rendered	Timekeeper	Hours	Fees	Sum	Circle	Action		
06/05/25	10098983	Several emails with counsel, call related to approach to professionals claims, address prospective priority claims.	Zaro, David	0.40	218.00	31,796.00	WO	HD	TR	_____
06/10/25	10103598	Review and respond to emails from Receiver's office and GT co-counsel regarding claims matters (0.2); review and attend to inquiries regarding pre-receivership professional claims (0.5).	Del Castillo, Joshua	0.70	381.50	32,177.50	WO	HD	TR	_____
06/14/25	10109248	Emails to AM counsel and Receiver's office regarding responses to letters to prospective claimants (0.4); additional analysis regarding pre-receivership prospective creditor claim (1.7).	Del Castillo, Joshua	2.10	1,144.50	33,322.00	WO	HD	TR	_____
06/17/25	10112303	Review documents and attention to issues regarding prospective pre-receivership professional claims (0.9); review and respond to emails from AM counsel and Receiver's office regarding same (0.3).	Del Castillo, Joshua	1.20	654.00	33,976.00	WO	HD	TR	_____
06/19/25	10114781	Review documents in connection with pre-receivership prospective claims and prepare notes for discussion regarding same (3.7).	Del Castillo, Joshua	3.70	2,016.50	35,992.50	WO	HD	TR	_____
06/20/25	10115578	Emails with AM counsel and confer regarding claims issues (0.5).	Del Castillo, Joshua	0.50	272.50	36,265.00	WO	HD	TR	_____
06/26/25	10123410	Attention to pre-receivership creditor claims issue and review associated documents (0.7); emails to AM counsel and Receiver's office regarding same (0.2); confer with AM counsel regarding	Del Castillo, Joshua	1.20	654.00	36,919.00	WO	HD	TR	_____

07/28/25 10:40:24 PROFORMA STATEMENT FOR MATTER 392775.00008 (Winkler, Geoff - Receiver for J&J Consul) (Claims & Distribution)

Fees for Matter 392775.00008.(Claims & Distribution)

Trans Date	Index	Description of Service Rendered same (0.3).	Timekeeper	Hours	Fees	Sum	Circle	Action
06/29/25	10123789	Continue review documents submitted by prospective pre-receivership professional claimants (0.9); prepare notes for discussion with Receiver and AM counsel regarding same (0.5).	Del Castillo, Joshua	1.40	763.00	37,682.00	WO	HD TR

Proforma Summary**Timekeeper**

Number	Timekeeper	Hours	Rate	Amounts
000313	Zaro, David	0.80	545.00	436.00
001842	Del Castillo, Joshua	57.40	545.00	31,283.00
002510	Pham, Matt D.	2.40	445.00	1,068.00
002744	Gonzales, Rachael	11.00	445.00	4,895.00
		71.60		\$37,682.00
Subtotal Fees				\$37,682.00
Discount				0.00
Total Fees				37,682.00
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 07/01/25

Fiscal YTD

Calendar YTD

LTD

07/28/25 10:40:24 PROFORMA STATEMENT FOR MATTER 392775.00008 (Winkler, Geoff - Receiver for J&J Consul) (Claims & Distribution)

	Total	Fees	Disb.	Total	Fees	Disb.	Total	Fees	Disbursements
Worked	12,021.50	12,021.50	0.00	58,369.00	58,369.00	0.00	59,548.00	59,548.00	0.00
Unbilled Adj	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00
Billed	0.00	0.00	0.00	44.50	44.50	0.00	1,179.00	1,179.00	0.00
Collected	0.00	0.00	0.00	44.50	44.50	0.00	1,179.00	1,179.00	0.00
AR Write Off	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00

	Total	Fees	Costs
WIP	58,369.00	58,369.00	0.00
Balance			
AR Balance	0.00	0.00	0.00
Unalloc	0.00		
Payment			
Client Trust	0.00		
Balance			

Billing Address

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

07/28/25 10:40:25 PROFORMA STATEMENT FOR MATTER 392775.00009 (Winkler, Geoff - Receiver for J&J Consul) (Third Party Claims & Recoveries)

Preliminary Billing FormBilling Atty: 001842 - Del Castillo,
Joshua

Matter #: 392775.00009

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

Date of Last Billing: 06/01/24

Matter Name: Third Party Claims & Recoveries

Proforma Number: 1344296

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	
05/07/25	10064152	Confer with Kyle Ewing regarding approach for Grigsby chapter 13 case, including Grigsby's motion to extend deadline to file schedules	Pham, Matt D.	0.40	178.00	178.00	WO	HD	TR

Proforma Summary

Timekeeper Number	Timekeeper	Hours	Rate	Amounts
002510	Pham, Matt D.	0.40	445.00	178.00
		0.40		\$178.00
Subtotal Fees				\$178.00
Discount				0.00
Total Fees				178.00
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
--

07/28/25 10:40:25 PROFORMA STATEMENT FOR MATTER 392775.00009 (Winkler, Geoff - Receiver for J&J Consul) (Third Party Claims & Recoveries)

Account Summary – As Of 07/01/25

	Fiscal YTD			Calendar YTD			LTD		
	Total	Fees	Disb.	Total	Fees	Disb.	Total	Fees	Disbursements
Worked	0.00	0.00	0.00	1,050.00	1,050.00	0.00	93,497.00	93,497.00	0.00
Unbilled Adj	0.00	0.00	0.00	0.00	0.00	0.00	44.50	44.50	0.00
Billed	0.00	0.00	0.00	0.00	0.00	0.00	92,402.50	92,402.50	0.00
Collected	0.00	0.00	0.00	0.00	0.00	0.00	92,402.50	92,402.50	0.00
AR Write Off	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00
<i>WIP</i>	<i>1,050.00</i>	<i>1,050.00</i>	<i>0.00</i>						
<i>Balance</i>									
<i>AR Balance</i>	<i>0.00</i>	<i>0.00</i>	<i>0.00</i>						
<i>Unalloc</i>	<i>0.00</i>								
<i>Payment</i>									
<i>Client Trust</i>	<i>0.00</i>								
<i>Balance</i>									

Billing Address

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

EXHIBIT B

EXHIBIT B

LAWRENCE J SEMENZA, III, P.C.

dba SEMENZA RICKARD LAW

10161 Park Run Drive, Suite 150

American Financial Services

c/o Geoff Winkler

2300 West Sahara Avenue, Suite 822

Las Vegas, NV 89102

Receiver for J&J Consulting Services, Inc

Las Vegas, Nevada 89145

Telephone: (702) 835-6803

Facsimile: (702) 920-8669

Federal I.D. # 27-4465751

Date 6/5/2025

Invoice Number 7092-01_35

Client Number 7092

Matter Number 01

RE: Receiver in Nevada Actions

BILL THROUGH DATE 4/30/2025

Date	Employee	Description	Hours	Rate	Amount
4/1/2025	O Kelly	PROFESSIONAL FEES Review G Winkler's report re forensic accounting (0.1) (2:22-cv-00612); review order Granting stipulation to extend briefing schedule for certain motions with class certification and summary judgment (0.1) (2:22-cv-00529); review order Granting stipulation to extend briefing schedule for certain motions with class certification and summary judgment (0.1) (2:23-cv-00703); review joint status report re motion to compel discovery (0.1) (2:22-cv-00529); review stipulation to extend time to file opposition to order to show cause re compliance with subpoena and order (0.1) (2:22-cv-00612); review order approving stipulation to extend time to file opposition to order to show cause re compliance with subpoena and order (0.1) (2:22-cv-00612)	0.6	145.00	87.00
4/3/2025	O Kelly	Review J Judd's opposition to motion for order to show cause (0.1) (2:22-cv-00612)	0.1	145.00	14.50
4/4/2025	O Kelly	Review Plaintiff's reply in support of class certification and motion to redact/seal same (0.2) (2:22-cv-00529); review notice of judgment debtor examination of A Grigsby (0.1) (2:22-cv-00612)	0.3	145.00	43.50
4/9/2025	O Kelly	Review reply in support of motion for order to show cause re J Judd compliance with subpoena and order	0.1	145.00	14.50
4/10/2025	O Kelly	Review Wells Fargo's response to Plaintiff's motion to redact reply brief (0.1) (2:22-cv-00529); review Wells' Fargo's motion for summary judgment as to class Plaintiffs claims and motion to redact/seal same (0.2) (2:22-cv-00529); review Wells Fargo's motion for leave to file supplemental authority in opposition to motion for class certification (0.1) (2:22-cv-00529); review Plaintiffs' response to Wells Fargo's motion for leave to file supplemental authority in opposition to motion for class certification (0.1) (2:22-cv-00529)	0.5	145.00	72.50
4/15/2025	J Rickard	Prepare for and attend status hearing and hearing on motion to stay	1.2	375.00	450.00
4/17/2025	A Barreras	Review plaintiff's motion to redact opposition to Wells Fargo motion to exclude expert and to file under seal certain exhibits (0.1); review plaintiff's opposition to Wells Fargo's motion to exclude expert David A. Clark (0.1); review plaintiff's response to WF Mot to file under seal MSJ (0.1) (2:22-cv-00529-GMN-NJK); review order accepting eleventh status report, granting motions approve the eleventh quarterly applications (0.1) (2:22-cv-00612)	0.4	145.00	58.00
4/21/2025	A Barreras	Review minute order re status conference (2:22-cv-00612)	0.1	145.00	14.50
4/21/2025	A Barreras	Review plaintiffs' motion to redact plaintiffs opposition Wells Fargo motion to strike (0.1); review plaintiffs' opposition to Wells Fargo motion to strike declaration of G. Winkler (0.1) (00529)	0.2	145.00	29.00
4/22/2025	O Kelly	Review sealed opposition to motion to strike G Winkler (2:22-cv-005296) (0.1)	0.1	145.00	14.50
4/23/2025	O Kelly	Review receiver's notice of submission of proposed order re motion to intervene and stay proceedings (0.1) (2:22-cv-0612); review Plaintiffs' opposition to Wells Fargo's motion to exclude expert J Hall and motion to redact same (0.1) (2:22-cv-00529)	0.2	145.00	29.00

Total Current Invoice

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

Federal I.D. # 27-4465751

Date 6/5/2025

Invoice Number 7092-01_35

Client Number 7092

Matter Number 01

American Financial Services

c/o Geoff Winkler

2300 West Sahara Avenue, Suite 822

Las Vegas, NV 89102

Receiver for J&J Consulting Services, Inc

RE: Receiver in Nevada Actions

BILL THROUGH DATE 4/30/2025

Date	Employee	Description	Hours	Rate	Amount
4/24/2025	O Kelly	Review Wells Fargo's response to motion to redact opposition to motion to exclude D Clark (0.1) (2:22-cv-00529); review Wells Fargo's motion for summary judgment/motion to seal/redact same (0.2) (2:23-cv-00703); review order granting motion to intervene and stay proceedings (0.1) (2:22-cv-00612)	0.4	145.00	58.00
4/25/2025	O Kelly	Review Wells Fargo's response to motion to redact opposition to motion to strike G Winkler (0.1) (2:22-cv-00529)	0.1	145.00	14.50
4/30/2025	O Kelly	Review Wells Fargo's response to Plaintiffs' motion to redact opposition to motion to exclude expert J Hall (0.1) (2:22-c00529); review Wells Fargo's reply in support of motion to exclude expert D Clark and motion to redact same (0.1) (2:22-c00529)	0.2	145.00	29.00
		Subtotal			928.50

Total Current Invoice \$928.50

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

Federal I.D. # 27-4465751

Date 6/20/2025

Invoice Number 7092-01_36

Client Number 7092

Matter Number 01

American Financial Services

c/o Geoff Winkler

2300 West Sahara Avenue, Suite 822

Las Vegas, NV 89102

Receiver for J&J Consulting Services, Inc

RE: Receiver in Nevada Actions

BILL THROUGH DATE 5/31/2025

Date	Employee	Description	Hours	Rate	Amount
5/2/2025	O Kelly	PROFESSIONAL FEES Review Wells Fargo's reply in support of motion to strike declaration of G Winkler (0.1) (2:22-cv-00529)	0.1	145.00	14.50
5/6/2025	O Kelly	Review reply in support of motion to exclude expert J Hall and motion to redact same (2:22-cv-00529)	0.1	145.00	14.50
5/12/2025	O Kelly	Review motion to exclude portions of expert reports of K Jarek and motion to redact same (0.4) (2:22-cv-00529); review notice of A Grigsby bankruptcy (0.1) (2:22-cv-00612)	0.5	145.00	72.50
5/14/2025	A Barreras	Review notice of in camera submission of investor list (0.1)(2:22-cv-00612); review plaintiff's Securities and Exchange Commission's notice of decision (0.1)(2:22-cv-00612)	0.2	145.00	29.00
5/21/2025	O Kelly	Review Plaintiffs' opposition to motion for summary judgment, motion to redact exhibits re same and notice of manual filing of exhibits (0.2) (2:22-cv-00529)	0.2	145.00	29.00
5/28/2025	A Barreras	Review WF response to motion to redact opposition to WF motion for summary judgment and file under seal certain exhibits	0.1	145.00	14.50
5/29/2025	A Barreras	Review order re notice of bankruptcy (2:22-cv-00612)	0.1	145.00	14.50
		Subtotal			188.50

Total Current Invoice \$188.50

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

Federal I.D. # 27-4465751

Date 7/13/2025

Invoice Number 7092-01_37

Client Number 7092

Matter Number 01

American Financial Services

c/o Geoff Winkler

2300 West Sahara Avenue, Suite 822

Las Vegas, NV 89102

Receiver for J&J Consulting Services, Inc

RE: Receiver in Nevada Actions

BILL THROUGH DATE 6/30/2025

Date	Employee	Description	Hours	Rate	Amount
6/2/2025	O Kelly	PROFESSIONAL FEES Review e-mails re opposition to motion for summary judgment filing (0.1) (2:23-cv-00703); file opposition to motion for summary judgment and motion to redact same (3.0)(2:23-cv-00703) and address multiple issues re sealing	3.1	145.00	449.50
6/3/2025	O Kelly	Review minute order setting hearing on order to show cause re J Judd (2:22-cv-00612) (0.1)	0.1	145.00	14.50
6/6/2025	O Kelly	Review Wells Fargo's opposition to motion to exclude portions of K Jarek's expert report and motion to redact/seal portions of same (2:22-cv-00529) (0.2)	0.2	145.00	29.00
6/9/2025	O Kelly	Review Wells Fargo's response to motion to redact opposition to motion for summary judgment (2:23-cv-00703) (0.2); review Wells Fargo's reply in support of motion for summary judgment and motion to redact/seal same (2:22-cv-00529) (0.2)	0.4	145.00	58.00
6/13/2025	O Kelly	Review order granting stipulation to extend briefing schedule re motion for summary judgment (0.1) (2:23-cv-00703)	0.1	145.00	14.50
6/16/2025	O Kelly	Review minute order re order to show cause hearing (0.1) (2:22-cv-00612)	0.1	145.00	14.50
6/23/2025	O Kelly	Review USDC deadlines re transcript re order to show cause hearing (2:22-cv-00612) (0.1); review motion to redact portions of motion to exclude portions of expert reports of K Jarek (2:22-cv-00529) (0.1); review reply in support of motion to exclude portions of expert reports of K Jarek (2:22-cv-00529) (0.1)	0.3	145.00	43.50
6/27/2025	O Kelly	Review Wells Fargo's response to motion to redact Plaintiff's reply in support of motion to exclude expert K Jarek (2:22-cv-00529) (001)	0.1	145.00	14.50
6/30/2025	O Kelly	Review J Judd's response to the court's consideration of appointing a special master (2:22-cv-00612) (0.1)	0.1	145.00	14.50
		Subtotal			652.50

Total Current Invoice \$652.50