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12 *Attorneys for Receiver Geoff Winkler*

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

17 SECURITIES AND EXCHANGE  
18 COMMISSION,

19 Plaintiff,

20 vs.

21 MATTHEW WADE BEASLEY, *et al.*,

22 Defendants,

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

24 Relief Defendants.  
25

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

Judge Hon. Cristina D. Silva

**EIGHTH 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 in the above-entitled action, and Semenza Kircher Rickard ("SKR"), the  
5 Receiver's local counsel, hereby submit this Eighth Quarterly Application for Payment of Fees and  
6 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 SKR 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  
11 SKR 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 SKR 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  
24 Defendants") and authorized, subject to the approval of this Court, to "engage and employ persons  
25 in his discretion ... to assist him in carrying out his duties and responsibilities [as Receiver],  
26 including, but not limited to ... attorneys" and other professionals. (*See* Appointment Order at  
27 ¶ 7(F).)

28

1 This Application represents the eighth quarterly application for payment of fees and  
 2 reimbursement of expenses submitted by Allen Matkins and SKR in accordance with  
 3 Paragraph 62 of the Appointment Order, and covers the fees and expenses incurred by each of  
 4 them between January 1, 2024 and March 31, 2024 (the "Application Period").

5 By way of this Application, Allen Matkins and SKR request the Court's approval of 100%  
 6 of their fees and expenses incurred during the Application Period, and further request the interim  
 7 payment of 80% of such fees and 100% of such expenses, to be paid from the funds of the  
 8 receivership estate established in the above-entitled action (the "Receivership Estate" or "Estate").  
 9 Specifically, the amounts of the Applicants' fees and expenses sought to be approved and paid  
 10 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	\$80,429.00	\$64,343.20	\$4,655.59	\$4,655.59
SKR	\$1,649.50	\$1,319.60	\$98.00	\$98.00
<b><u>TOTAL:</u></b>	\$82,078.50	\$65,662.60	\$4,753.59	\$4,753.59

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

## 24 **II. GENERAL SUMMARY.**

25 During the Application Period, and with assistance from Allen Matkins and SKR, the  
 26 Receiver made substantial progress on critical elements of Estate administration, critically  
 27 including document recovery, review, and analysis, asset recovery and monetization, and case  
 28

1 administration – including in connection with pending Ninth Circuit appellate matters implicating  
2 the interests of the Receiver and the Estate, to say nothing of satisfying the Receiver's ongoing  
3 filing obligations arising in connection with pending litigation, and regularly reporting on his  
4 progress to this Court.

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

17 As detailed further below, in coordination with Allen Matkins and SKR, the Receiver has  
18 continued to attend to critical case administration deadlines and other matters of importance to the  
19 receivership, and continued his efforts to obtain and review essential documents relating to the  
20 business and financial activities of the Receivership Defendants.

21 Given the amount and significance of the work completed by Allen Matkins and SKR, and  
22 the significant benefit of their efforts to the Estate, Allen Matkins and SKR respectfully submit –  
23 as further detailed in the accompanying motion to approve the Application (filed under separate  
24 cover in omnibus form) that the fees and expenses incurred during the Application Period are  
25 reasonable and appropriate and should be approved and paid, on an interim basis, in the amounts  
26 indicated above. Again, as an accommodation to the Estate, and consistent with the SEC's billing  
27 guidelines and the ordinary practice in federal receiverships, Allen Matkins and SKR request that  
28 the Court approve 100% of the fees and expenses incurred during the Application Period but

1 authorize payment, on an interim basis, of only 80% of such fees and 100% of such expenses, at  
2 this time.

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

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

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

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

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

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

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

23 In all, on account of its services rendered to the Receiver during the Application Period,  
24 Allen Matkins billed 160.2 hours and \$80,429.00 in fees, and incurred \$4,655.59 in expenses,  
25 across the following categories<sup>1</sup>:

26  
27 <sup>1</sup> As in prior applications, a limited number of Allen Matkins' entries reflect discussions  
28 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

<u>Category</u>	<u>Hours</u>	<u>Fees</u>	<u>Expenses</u>
General Receivership	28.6	\$15,427.00	\$4,655.59
Asset Recovery & Management	16.0	\$8,210.00	\$0.00
Investigation & Reporting	111.3	\$54,678.50	\$0.00
Investor Issues & Communications	0.8	\$436.00	\$0.00
Sale, Disposition & Transfer of Assets	1.2	\$594.00	\$0.00
Third Party Claims & Recoveries	2.3	\$1,083.50	\$0.00
<b><u>TOTAL:</u></b>	<b>160.2</b>	<b>\$80,429.00</b>	<b>\$4,655.59</b>

Provided below are narrative summaries of the work performed under each of the categories, and attached hereto as **Exhibit 1** 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 of as much as 40%, resulting in substantial savings for the Estate.<sup>2</sup> 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.

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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.

<sup>2</sup> 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 addition, and over and above the savings to the Estate realized from rate discounts, Allen Matkins has written off tens of thousands of dollars in time entries, in accordance with its commitment to minimizing the Estate's expenses.

1                   **1.       General Receivership.**

2                   During the Application period, Allen Matkins attorneys billed 28.6 hours to the "General  
3 Receivership" work category, largely in connection with matters relating to the Receiver's  
4 administration of the Estate or attending to administrative matters arising from the Receiver's  
5 obligations under the Appointment Order. Allen Matkins incurred \$4,655.59 in general expenses,  
6 consisting almost entirely of: (1) monthly fees for electronic document hosting and management  
7 services; and (2) costs associated with the service of subpoenas upon financial institutions and  
8 other parties in connection with the Receiver's ongoing investigation and forensic accounting.  
9 Allen Matkins personnel billed the following time and fees during the Application Period:

<u>Timekeeper</u>	<u>Position</u>	<u>Hourly Rate</u>	<u>Hours</u>	<u>Fees</u>
David Zaro	Partner	\$545	1.0	\$545.00
Joshua del Castillo	Partner	\$545	26.0	\$14,170.00
Matthew Pham	Associate	\$445	1.6	\$712.00
<b><u>TOTAL:</u></b>			<b>28.6</b>	<b>\$15,427.00</b>

15                   Work performed in this category generally related to critical case and Estate administration  
16 matters. During the Application Period, Allen Matkins personnel: (1) attended to outstanding  
17 case administration tasks; (2) with the Receiver and co-counsel, continued the development of the  
18 Receiver's plans for the administration of the Estate; (3) attended to issues arising in connection  
19 with two then pending Ninth Circuit appellate matters; (4) monitored the relevant dockets in  
20 connection with pending litigation; and (5) prepared for and attended meetings of counsel and  
21 Court hearings. As a result of these efforts, the Receiver has streamlined his case and Estate  
22 administration strategy, appropriately responded to numerous pleadings that directly implicated  
23 the viability of the Court's receivership, and continued to pursue his obligations to the Court and  
24 interested parties.  
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1                                   **2.     Asset Recovery & Management.**

2                   During the Application period, Allen Matkins attorneys billed 16.0 hours to the "Asset  
3 Recovery & Management" work category. Allen Matkins personnel billed the following time and  
4 fees during the Application Period:

5

<u>Timekeeper</u>	<u>Position</u>	<u>Hourly Rate</u>	<u>Hours</u>	<u>Fees</u>
6 Joshua del Castillo	Partner	\$545	10.9	\$5,940.50
7 Matthew Pham	Associate	\$445	2.4	\$1,068.00
8 James Robichaud	Associate	\$445	2.7	\$1,201.50
9 <b><u>TOTAL:</u></b>			<b>1.7</b>	<b>\$8,210.00</b>

10

11                   The time expended in this category related to the Receiver's efforts to recover from third  
12 parties assets subject to the turnover provisions of the Appointment Order and Amended  
13 Appointment Order, which require all third parties in possession of assets of the Receivership  
14 Defendants to turn such assets over to the Receiver. During the Application Period, Allen Matkins  
15 attorneys: (1) conferred with the Receiver's office regarding the status of a variety of turnover-  
16 related matters; (2) completed an analysis of prospective additional turnover claims; (3) reviewed  
17 materials relating to pending turnover demands; and (4) prepared new and follow-up turnover  
18 demands to third parties, including at least one financial institution in possession of funds subject  
19 to turnover to the Receiver.

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

23                                   **3.     Investigation and Reporting.**

24                   During the Application period, Allen Matkins attorneys billed 111.3 hours to the  
25 "Investigation & Reporting" work category.

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

27

28



<u>Timekeeper</u>	<u>Position</u>	<u>Hourly Rate</u>	<u>Hours</u>	<u>Fees</u>
David Zaro	Partner	\$545	7.5	\$4,087.50
Joshua del Castillo	Partner	\$545	44.0	\$23,980.00
Matthew Pham	Associate	\$445	31.7	\$14,106.50
James Robichaud	Associate	\$445	28.1	\$12,504.50
<b><u>TOTAL:</u></b>			<b>111.3</b>	<b>\$54,678.50</b>

During the Application Period, the Receiver and his personnel continued extensive efforts to refine and update his 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 in order to satisfy obligations arising in connection with both 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"), as well as his anticipated claims and distribution process in this matter. During the Application Period, and at the Receiver's request, Allen Matkins engaged in extensive and voluminous efforts to obtain additional documents relevant to the Receiver's ongoing accounting 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 existing productions were incomplete or otherwise required supplementation. Allen Matkins' recent document recovery efforts have 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 certain financial institutions concerning the scope of the subpoenas at issue, and the institutions' subsequent and supplemental productions;
- (3) drafted subpoena follow-up letters identifying

1 responsive documents omitted from an initial document production and requesting the  
 2 supplemental production of such documents; (4) coordinated with the Receiver's staff to manage  
 3 and administer documents produced directly to Allen Matkins; (5) corresponded extensively with  
 4 the Receiver's accounting team with respect to the above-described document production efforts;  
 5 (6) attended to legal analyses and discussions concerning actual and contemplated discovery  
 6 requests made to the Receiver; and (7) assisted with the satisfaction of the Receiver's reporting  
 7 obligations to the Court.

#### 8 **4. Investor Issues & Communications.**

9 During the Application period, Allen Matkins attorneys billed 0.8 hours to the "Investor  
 10 Issues & Communications" 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	0.8	\$436.00
<b><u>TOTAL:</u></b>			<b>0.8</b>	<b>\$436.00</b>

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 15  
 16 Work performed in this category related to an inquiry made to Allen Matkins from a  
 17 purported representative of certain allegedly defrauded investors regarding the status of the  
 18 receivership case and any timetable for the presentation of the Receiver's contemplated claims and  
 19 distribution plan to the Court.

#### 20 **5. Sale, Disposition & Transfer of Assets.**

21 During the Application period, Allen Matkins attorneys billed 1.2 hours to the "Sale,  
 22 Disposition & Transfer of Assets" work category.

23 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	0.6	\$327.00
Matthew Pham	Associate	\$445	0.6	\$267.00
<b><u>TOTAL:</u></b>			<b>1.2</b>	<b>\$594.00</b>

1 Work performed in this category related to the Receiver's ongoing asset disposition efforts,  
 2 including with respect to some of the Estate's most valuable personal and real property. During  
 3 the Application Period, Allen Matkins attorneys: (1) attended to inquiries from the Receiver's  
 4 office regarding pending and contemplated real property sales; and (2) prepared the termination of  
 5 a *lis pendens* relating to a real property under the Receiver's authority and control.

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

7 During the Application period, Allen Matkins attorneys billed 2.3 hours to the "Third Party  
 8 Claims & Recoveries" work category.

9 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	0.6	\$327.00
Matthew Pham	Associate	\$445	1.7	\$756.50
<b><u>TOTAL:</u></b>			<b>4.4</b>	<b>\$1,083.50</b>

14  
 15 Work performed in this category related to the Receiver's ongoing examination and  
 16 evaluation of potential claims against third parties and actionable conduct appearing to implicate  
 17 the interests of the Estate. During the Application Period, Allen Matkins attorneys worked with  
 18 the Receiver's office and co-counsel to review, analyze, and prosecute claims against EcoBattery,  
 19 an entity believed to have been the recipient of millions of dollars diverted from investors (and  
 20 with whom the Receiver has since negotiated a tentative settlement), including via the review of  
 21 documents, legal analysis of prospective claims, and reviewing and editing the Receiver's final  
 22 complaint against EcoBattery and affiliated parties.

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

24 During the Application Period, SKR provided critical local counsel support to the  
 25 Receiver, largely in connection with outstanding case administration deadlines, filings, and  
 26 pending discovery inquiries. Among other things, SKR attended to ensuring outstanding filing  
 27 deadlines were satisfied, provided logistical support on matters arising in connection with the  
 28

1 above-entitled matter and the Wells Fargo Case, and reviewed and assisted with the submission of  
2 a number of the Receiver's filings in this matter.

3 A complete description of the services rendered by SKR can be found in the invoices  
4 collectively appended hereto as **Exhibit 2**.

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

<u>Month</u>	<u>Total Fees Billed</u>
January 2024	\$179.00
February 2024	\$488.50
March 2024	\$982.00
<b><u>TOTAL:</u></b>	<b>\$1,649.50</b>
<b><u>TOTAL (including \$98.00 expenses)</u></b>	<b>\$1,747.50</b>

14 **IV. THE FEES AND EXPENSES INCURRED ARE REASONABLE AND SHOULD BE**  
15 **ALLOWED.**

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

24 As reflected in the Receiver's prior submissions to this Court, Allen Matkins and SKR are  
25 providing an extremely high quality of work in a matter involving dozens of relevant parties and  
26 hundreds of millions of dollars in assets. Their efforts are bearing fruit: the Receiver has  
27 recovered more than \$80 million in personal and real property assets. He has consistently  
28 succeeded in securing necessary and appropriate relief from the Court, the turnover of cash and

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

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

15 **V. CONCLUSION.**

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

- 18 1. Granting this Application in its entirety;
- 19 2. Approving Allen Matkins' fees and expenses incurred during the Application  
20 Period, in the respective amounts of \$80,429.00 and \$4,655.59;
- 21 3. Authorizing the Receiver to pay Allen Matkins, on an interim basis, 80% of its  
22 approved fees incurred during the Application Period, in the amount of \$64,343.20, and 100% of  
23 its approved expenses incurred during the Application Period, in the amount of \$4,655.59, from  
24 the funds of the Receivership Estate;
- 25 4. Approving SKR's fees and expenses incurred during the Application Period, in the  
26 respective amounts of \$1,649.50 and \$98.00; and

27  
28 <sup>3</sup> Indeed, the less than \$90,000.00 requested in this application reflects approximately one tenth  
of one percent of the approximately \$80 million in assets already recovered by the Receiver.

1           5.       Authorizing the Receiver to pay SKR, on an interim basis, 80% of its approved fees  
2 incurred during the Application Period, in the amount of \$1,319.60, and 100% of its approved  
3 expenses incurred during the Application Period, in the amount of \$98.00; and

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

5 Dated: May 14, 2024

SEMENZA KIRCHER RICKARD

*/s/ Jarrod L. Rickard*

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ALLEN MATKINS LECK GAMBLE  
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Joshua A. del Castillo (admitted *pro hac vice*)  
Matthew D. Pham (admitted *pro hac vice*)  
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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 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 14th day of May, 2024, I served the document(s), described as:

**EIGHTH 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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30 Casey R. Fronk FronkC@sec.gov, #slro-docket@sec.gov



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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.**

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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*  
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6 An Employee of Semenza Kircher Rickard  
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# **EXHIBIT 1**

# **EXHIBIT 1**

04/09/24 13:37:52 PROFORMA STATEMENT FOR MATTER 392775.00002 (Winkler, Geoff - Receiver for J&amp;J Consul) (General Receivership)

**Preliminary Billing Form**Billing Atty: 001842 - Del Castillo,  
Joshua

Matter #: 392775.00002

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

Date of Last Billing: 12/26/23

Matter Name: General Receivership

Proforma Number: 1269755

Client/Matter Joint Group # 392775.1

Client Matter Number:

**Fees for Matter 392775.00002.(General Receivership)**

<b>Trans Date</b>	<b>Index</b>	<b>Description of Service Rendered</b>	<b>Timekeeper</b>	<b>Hours</b>	<b>Fees</b>	<b>Sum</b>	<b>Circle</b>	<b>Action</b>		
01/01/24	9464466	Review notes, dockets, and emails from co-counsel and correspondence regarding case administration matters (0.5).	Del Castillo, Joshua	0.50	272.50	272.50	WO	HD	TR	_____
01/04/24	9468304	Prepare for and attend videoconference with Receiver and GT co-counsel (0.3).	Del Castillo, Joshua	0.30	163.50	436.00	WO	HD	TR	_____
01/08/24	9470982	Review notes from emails with Receiver's office and follow-up regarding case administration matters (0.5).	Del Castillo, Joshua	0.50	272.50	708.50	WO	HD	TR	_____
01/09/24	9472425	Confer with J. Robichaud regarding pending and necessary case administration matters (0.5).	Del Castillo, Joshua	0.50	272.50	981.00	WO	HD	TR	_____
01/10/24	9473584	Review docket and recent filings, prepare notes for discussion with receiver, and attention to case administration matters (1.1).	Del Castillo, Joshua	1.10	599.50	1,580.50	WO	HD	TR	_____
01/18/24	9481961	Prepare for and attend videoconference with Receiver's office and GT co-counsel (0.5).	Del Castillo, Joshua	0.50	272.50	1,853.00	WO	HD	TR	_____

04/09/24 13:37:52 PROFORMA STATEMENT FOR MATTER 392775.00002 (Winkler, Geoff - Receiver for J&amp;J Consul) (General Receivership)

**Fees for Matter 392775.00002.(General Receivership)**

<b>Trans Date</b>	<b>Index</b>	<b>Description of Service Rendered</b>	<b>Timekeeper</b>	<b>Hours</b>	<b>Fees</b>	<b>Sum</b>	<b>Circle</b>	<b>Action</b>		
01/22/24	9485901	Review recent docket entries and recent filings/orders (0.5); prepare updates and inquiries regarding pending or outstanding case administration matters (0.7).	Del Castillo, Joshua	1.20	654.00	2,507.00	WO	HD	TR	_____
01/25/24	9489787	Emails with Receiver's office regarding pending case administration matters (0.3); emails to M. Pham and J. Ronichaud regarding same (0.3).	Del Castillo, Joshua	0.60	327.00	2,834.00	WO	HD	TR	_____
01/26/24	9491199	Emails with AM counsel regarding case administration matters (0.3); review docket and recent filings (0.2).	Del Castillo, Joshua	0.50	272.50	3,106.50	WO	HD	TR	_____
01/29/24	9495139	Emails with AM counsel regarding case administration matters (0.3); review notice of appeal regarding Grigsby sanction and confer with counsel regarding prospective appellate coverage (0.5).	Del Castillo, Joshua	0.80	436.00	3,542.50	WO	HD	TR	_____
02/01/24	9501021	Prepare for and attend videoconference with Receiver and co-counsel (0.5).	Del Castillo, Joshua	0.50	272.50	3,815.00	WO	HD	TR	_____
02/05/24	9503947	Email with Ninth Circuit clerk regarding scheduling and review docket (0.3); review ninth circuit correspondence regarding new appeal (0.2).	Del Castillo, Joshua	0.50	272.50	4,087.50	WO	HD	TR	_____
02/07/24	9506593	Prepare for and videoconference with Receiver and GT co-counsel regarding forensic accounting, claims, and mediation-related matters, and anticipated additional discovery for same (0.6); analysis of and review documents in connection with same (1.8).	Del Castillo, Joshua	2.40	1,308.00	5,395.50	WO	HD	TR	_____

04/09/24 13:37:52 PROFORMA STATEMENT FOR MATTER 392775.00002 (Winkler, Geoff - Receiver for J&amp;J Consul) (General Receivership)

**Fees for Matter 392775.00002.(General Receivership)**

<b>Trans Date</b>	<b>Index</b>	<b>Description of Service Rendered</b>	<b>Timekeeper</b>	<b>Hours</b>	<b>Fees</b>	<b>Sum</b>	<b>Circle</b>	<b>Action</b>		
02/08/24	9507673	Prepare for and attend videoconference with Receiver and GT co-counsel (0.6); review Grigsby appellate docket and analysis of issue raised by co-counsel (0.6); emails and teleconferences with AM counsel regarding pending case administration matters (0.8); review documents in connection with same (0.3).	Del Castillo, Joshua	2.30	1,253.50	6,649.00	WO	HD	TR	_____
02/12/24	9512052	Review ninth circuit dockets and prepare notes regarding upcoming deadlines (0.3); emails to GT co-counsel regarding case administration (0.2); attention to case admin matters and emails to Receiver's office (0.3).	Del Castillo, Joshua	0.80	436.00	7,085.00	WO	HD	TR	_____
02/14/24	9531179	Attention to issues regarding Shahabe oral argument (0.4); review Gigsby appellate docket (0.2).	Del Castillo, Joshua	0.60	327.00	7,412.00	WO	HD	TR	_____
02/15/24	9515024	Virtually attend Shahabe intervenor argument at Ninth Circuit (0.5); follow-up emails and calls regarding same (0.5); prepare for and attend videoconference with Receiver regarding case status and administration issues (0.6).	Del Castillo, Joshua	1.60	872.00	8,284.00	WO	HD	TR	_____
02/15/24	9519300	Call/emails with counsel related to the appeal and argument (.4). Follow-up as to outstanding issues related to accounting with counsel (.2).	Zaro, David	0.60	327.00	8,611.00	WO	HD	TR	_____
02/16/24	9516255	Review docket and recent filings, including Grigsby motion (0.5); legal analysis regarding Grigsby motion and prepare correspondence to GT co-counsel	Del Castillo, Joshua	1.80	981.00	9,592.00	WO	HD	TR	_____

04/09/24 13:37:52 PROFORMA STATEMENT FOR MATTER 392775.00002 (Winkler, Geoff - Receiver for J&amp;J Consul) (General Receivership)

**Fees for Matter 392775.00002.(General Receivership)**

<b>Trans Date</b>	<b>Index</b>	<b>Description of Service Rendered</b>	<b>Timekeeper</b>	<b>Hours</b>	<b>Fees</b>	<b>Sum</b>	<b>Circle</b>	<b>Action</b>		
		regarding same (1.0); review and respond to correspondence from and assemble requested materials for receiver regarding Shahabe intervenor appeal (0.3).								
02/20/24	9519534	Review and confer regarding emails regarding Grigsby appeal and mediation conference (0.5); review notes and attention to pending case administration matters (0.3); follow-up with M. Pham and J. Robichaud regarding same (0.3).	Del Castillo, Joshua	1.10	599.50	10,191.50	WO	HD	TR	_____
02/21/24	9523487	Evaluate court's minute orders and emails concerning the pending issues, follow-up with Receiver counsel.	Zaro, David	0.40	218.00	10,409.50	WO	HD	TR	_____
02/22/24	9522396	Review Receiver agenda for videoconference and follow-up regarding issues for same (0.4); prepare for and attend videoconferene with Receiver's office and GT co-counsel (0.4).	Del Castillo, Joshua	0.80	436.00	10,845.50	WO	HD	TR	_____
02/23/24	9531182	Review documents and emails to AM and GT counsel regarding case administration matters (0.9).	Del Castillo, Joshua	0.90	490.50	11,336.00	WO	HD	TR	_____
02/28/24	9529681	Emails with Receiver's office regarding case administration matters (0.2).	Del Castillo, Joshua	0.20	109.00	11,445.00	WO	HD	TR	_____
02/29/24	9531143	Review agenda from Receiver's office and prepare for and attend videoconference with Receiver's office and GT counsel (0.6); confer with D. Zaro regarding same (0.2).	Del Castillo, Joshua	0.80	436.00	11,881.00	WO	HD	TR	_____
03/01/24	9554352	Review Grigsby Ninth Circuit docket and emails regarding same (0.2); follow-up	Del Castillo, Joshua	0.40	218.00	12,099.00	WO	HD	TR	_____

04/09/24 13:37:52 PROFORMA STATEMENT FOR MATTER 392775.00002 (Winkler, Geoff - Receiver for J&amp;J Consul) (General Receivership)

**Fees for Matter 392775.00002.(General Receivership)**

<b>Trans Date</b>	<b>Index</b>	<b>Description of Service Rendered</b>	<b>Timekeeper</b>	<b>Hours</b>	<b>Fees</b>	<b>Sum</b>	<b>Circle</b>	<b>Action</b>		
		inquiry to M. Pham regarding case administration matter (0.2).								
03/07/24	9544088	Virtually meet with client and co-counsel regarding case updates and outstanding tasks	Pham, Matt D.	0.20	89.00	12,188.00	WO	HD	TR	_____
03/08/24	9541754	Review docket and recent filings (0.5); emails to D. Zaro and M. Pham regarding case administration matters (0.3).	Del Castillo, Joshua	0.80	436.00	12,624.00	WO	HD	TR	_____
03/14/24	9548364	Confer with D. Zaro and M. Pham regarding case administration matters (0.3); prepare for and attend videoconference with Receiver and co-counsel (0.4).	Del Castillo, Joshua	0.70	381.50	13,005.50	WO	HD	TR	_____
03/15/24	9549275	Review decision on Shahabe appeal and email to Receiver (0.3); confer with counsel regarding same (0.2).	Del Castillo, Joshua	0.50	272.50	13,278.00	WO	HD	TR	_____
03/20/24	9555534	Review docket and recent filings, including Court orders (0.2); confer with M. Pham regarding upcoming hearing (0.2).	Del Castillo, Joshua	0.40	218.00	13,496.00	WO	HD	TR	_____
03/21/24	9556773	Review submission from Receiver's office, along with notes regarding discussins with AM team, and prepare for and attend videoconfernce with Receiver and GT counsel (0.8).	Del Castillo, Joshua	0.80	436.00	13,932.00	WO	HD	TR	_____
03/21/24	9559818	Email correspondence with Judge Silva's courtroom deputy regarding appearance at upcoming status conference	Pham, Matt D.	0.20	89.00	14,021.00	WO	HD	TR	_____
03/22/24	9557713	Attention to case administration issues and emails to local counsel regarding same	Del Castillo, Joshua	0.30	163.50	14,184.50	WO	HD	TR	_____



04/09/24 13:37:52 PROFORMA STATEMENT FOR MATTER 392775.00002 (Winkler, Geoff - Receiver for J&amp;J Consul) (General Receivership)

**Fees for Matter 392775.00002.(General Receivership)**

<b>Trans Date</b>	<b>Index</b>	<b>Description of Service Rendered (0.3).</b>	<b>Timekeeper</b>	<b>Hours</b>	<b>Fees</b>	<b>Sum</b>	<b>Circle Action</b>			
03/25/24	9561118	Confer with M. Pham regarding preparation for hearing (0.2); review notes and confer with M. Pham and D. Zaro regarding case administration and pending discovery matters (0.5).	Del Castillo, Joshua	0.70	381.50	14,566.00	WO	HD	TR	_____
03/25/24	9569171	Virtually attend status conference (1.0); Confer with Josh del Castillo regarding recap of status conference (0.2)	Pham, Matt D.	1.20	534.00	15,100.00	WO	HD	TR	_____
03/28/24	9564839	Review documents and emails and attend to case administration issues, including with respect to ongoing deadline and discovery matters, and follow-up emails to M. Pham, GT co-counsel, and Receiver's office regarding same (0.6).	Del Castillo, Joshua	0.60	327.00	15,427.00	WO	HD	TR	_____

**Disbursements for Matter 392775.00002 (General Receivership)**

<b>Trans Date</b>	<b>Index</b>	<b>Type</b>	<b>Quantity</b>	<b>Amt</b>	<b>Circle Action</b>			
01/01/24	2858582	EDISC – CS Disco, Inc. - Monthly Hosting for January 2024	0.00	257.31	WO	HD	TR	_____
01/17/24	2861110	MSNGR – Federal Express - Ship To: John Hall - American Fiduciary Services LL	0.00	27.59	WO	HD	TR	_____
01/22/24	2858227	BW – Duplication - Black & White Copies	74.00	14.06	WO	HD	TR	_____
01/22/24	2861141	MSNGR – Federal Express - Ship To: Attn Lucy Michel, VP Legal - Credit Union 1	0.00	21.33	WO	HD	TR	_____
01/22/24	2861142	MSNGR – Federal Express - Ship To: Attn General Counsel - Credit Union 1	0.00	29.34	WO	HD	TR	_____
02/01/24	2864625	EDISC – CS Disco, Inc. - Monthly Hosting for February 2024	0.00	257.31	WO	HD	TR	_____

04/09/24 13:37:52 PROFORMA STATEMENT FOR MATTER 392775.00002 (Winkler, Geoff - Receiver for J&amp;J Consul) (General Receivership)

**Disbursements for Matter 392775.00002 (General Receivership)**

Trans Date	Index	Type	Quantity	Amt				
02/15/24	2863990	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	172.20	WO	HD	TR	_____
02/15/24	2863991	POS – Nationwide Legal, LLC - Charles Schwab & Co., 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	_____
02/15/24	2863992	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	172.20	WO	HD	TR	_____
02/15/24	2863993	POS – 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	172.20	WO	HD	TR	_____
02/15/24	2868035	POS – Service of Process - Nationwide Legal LLC - UMB Bank, National Association c/o United Agent Group Inc. SUBPOENA TO PRODUCE DOCUMENTS, INFORMATION, OR OBJECTS OR TO PERMIT INSPECTION OF PREMISES IN A CIVIL ACTION	0.00	301.60	WO	HD	TR	_____
02/15/24	2868040	POS – Service of Process - 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	302.70	WO	HD	TR	_____
02/21/24	2863497	BW – Duplication - Black & White Copies	35.00	6.65	WO	HD	TR	_____
02/21/24	2867843	POS – Nationwide Legal, LLC - Prudential Financial, Inc., SUBPOENA TO PRODUCE DOCUMENTS, INFORMATION, OR OBJECTS OR TO PERMIT INSPECTION OF PREMISES IN A CIVIL ACTION	0.00	301.60	WO	HD	TR	_____
02/21/24	2868033	POS – Service of Process - Nationwide Legal LLC - American Express Travel Related Services Company, Inc. SUBPOENA TO PRODUCE DOCUMENTS, INFORMATION, OR OBJECTS OR TO PERMIT INSPECTION OF PREMISES IN A CIVIL	0.00	301.60	WO	HD	TR	_____

04/09/24 13:37:52 PROFORMA STATEMENT FOR MATTER 392775.00002 (Winkler, Geoff - Receiver for J&amp;J Consul) (General Receivership)

**Disbursements for Matter 392775.00002 (General Receivership)**

Trans Date	Index	Type	Quantity	Amt					
02/21/24	2868034	ACTION POS – Service of Process - Nationwide Legal LLC - National Financial Services LLC SUBPOENA TO PRODUCE DOCUMENTS, INFORMATION, OR OBJECTS OR TO PERMIT INSPECTION OF PREMISES IN A CIVIL ACTION	0.00	55.20	WO	HD	TR	_____	
02/21/24	2868036	POS – Service of Process - 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	54.60	WO	HD	TR	_____	
02/21/24	2868037	POS – Service of Process - Nationwide Legal LLC - Fidelity Brokerage Services LLC SUBPOENA TO PRODUCE DOCUMENTS, INFORMATION, OR OBJECTS OR TO PERMIT INSPECTION OF PREMISES IN A CIVIL ACTION	0.00	172.20	WO	HD	TR	_____	
02/21/24	2868038	POS – Service of Process - 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	54.60	WO	HD	TR	_____	
02/21/24	2868039	POS – Service of Process - Nationwide Legal LLC - Fidelity Workplace Services LLC SUBPOENA TO PRODUCE DOCUMENTS, INFORMATION, OR OBJECTS OR TO PERMIT INSPECTION OF PREMISES IN A CIVIL ACTION	0.00	302.70	WO	HD	TR	_____	
02/21/24	2868041	POS – Service of Process - Nationwide Legal LLC - City & Police Federal Credit Union SUBPOENA TO PRODUCE DOCUMENTS, INFORMATION, OR OBJECTS OR TO PERMIT INSPECTION OF PREMISES IN A CIVIL ACTION	0.00	301.60	WO	HD	TR	_____	
02/21/24	2868042	POS – Service of Process - Nationwide Legal LLC - City National Bank SUBPOENA TO PRODUCE DOCUMENTS, INFORMATION, OR OBJECTS OR TO PERMIT INSPECTION OF PREMISES IN A CIVIL ACTION	0.00	150.90	WO	HD	TR	_____	
02/21/24	2868043	POS – Service of Process - Nationwide Legal LLC - TD Bank, National Association SUBPOENA TO PRODUCE DOCUMENTS, INFORMATION, OR OBJECTS OR TO PERMIT INSPECTION OF PREMISES IN A CIVIL ACTION	0.00	198.60	WO	HD	TR	_____	
02/27/24	2864915	BW – Duplication - Black & White Copies	6.00	1.14	WO	HD	TR	_____	
02/28/24	2865121	ADV – Citibank N.A. - Fee for document production in	0.00	68.00	WO	HD	TR	_____	

04/09/24 13:37:52 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		
03/01/24	2869064	response to a subpoena issued by the Receiver, Geoff Winkler EDISC – CS Disco, Inc. - Monthly Hosting for March 2024	0.00	257.31	WO	HD TR
03/04/24	2866868	ADV – American Express - Fee for document production in response to a subpoena issued by the Receiver, Geoff Winkler	0.00	49.00	WO	HD TR
03/05/24	2867845	POS – Nationwide Legal, LLC - Citibank, SUBPOENA TO PRODUCE DOCUMENTS, INFORMATION, OR OBJECTS OR TO PERMIT INSPECTION OF PREMISES IN A CIVIL ACTION	0.00	281.60	WO	HD TR
03/07/24	2867844	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	173.40	WO	HD TR
03/08/24	2868667	MSNGR – Federal Express - Ship To: John Hall - American Fiduciary Services LL	0.00	24.85	WO	HD TR

**Proforma Summary**

**Timekeeper**

Number	Timekeeper	Hours	Rate	Amounts
000313	Zaro, David	1.00	545.00	545.00
001842	Del Castillo, Joshua	26.00	545.00	14,170.00
002510	Pham, Matt D.	1.60	445.00	712.00
				\$15,427.00
Subtotal Fees				\$15,427.00
Discount				0.00
Total Fees				15,427.00
Total Disbursements				4,655.59

**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

04/09/24 13:37:52 PROFORMA STATEMENT FOR MATTER 392775.00002 (Winkler, Geoff - Receiver for J&amp;J Consul) (General Receivership)

**Account Summary – As Of 04/04/24**

	Fiscal YTD			Calendar YTD			LTD		
	Total	Fees	Disb.	Total	Fees	Disb.	Total	Fees	Disbursements
Worked	72,219.80	71,826.50	393.30	20,573.09	15,917.50	4,655.59	234,343.17	206,343.50	27,999.67
Unbilled Adj	854.38	804.40	49.98	0.00	0.00	0.00	2,645.18	2,251.20	393.98
Billed	84,997.67	75,276.20	9,721.47	23,756.48	15,825.50	7,930.98	188,500.62	188,500.62	23,344.08
Collected	84,997.67	75,276.20	9,721.47	23,756.48	15,825.50	7,930.98	211,844.70	188,500.62	23,344.08
AR Write Off	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00
	<b>Total</b>	<b>Fees</b>	<b>Costs</b>						
<b>WIP</b>	<b>20,740.21</b>	<b>15,917.50</b>	<b>4,822.71</b>						
<b>Balance</b>									
<b>AR Balance</b>	<b>0.00</b>	<b>0.00</b>	<b>0.00</b>						
<b>Unalloc</b>	<b>0.00</b>								
<b>Payment</b>									
<b>Client Trust</b>	<b>0.00</b>								
<b>Balance</b>									

**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

04/09/24 13:37:53 PROFORMA STATEMENT FOR MATTER 392775.00003 (Winkler, Geoff - Receiver for J&amp;J Consul) (Asset Recovery &amp; Management)

**Preliminary Billing Form**Billing Atty: 001842 - Del Castillo,  
Joshua

Matter #: 392775.00003

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

Date of Last Billing: 12/26/23

Matter Name: Asset Recovery &amp; Management

Proforma Number: 1269755

Client/Matter Joint Group # 392775.1

Client Matter Number:

**Fees for Matter 392775.00003.(Asset Recovery & Management)**

<b>Trans Date</b>	<b>Index</b>	<b>Description of Service Rendered</b>	<b>Timekeeper</b>	<b>Hours</b>	<b>Fees</b>	<b>Sum</b>	<b>Circle</b>	<b>Action</b>		
01/02/24	9469435	Cursory review of Wells Fargo's supplemental production and email correspondence with Grace Radke regarding same	Pham, Matt D.	0.60	267.00	267.00	WO	HD	TR	_____
01/15/24	9477182	Review and respond to correspondence from Receiver's office regarding bank account turnover (0.4); review materials relating to same, and emails to M. Pham regarding same (0.9).	Del Castillo, Joshua	1.30	708.50	975.50	WO	HD	TR	_____
01/16/24	9478633	Confer with J. Robichaud regarding turnover issues (0.2); assemble and deliver associated materials to J. Robichaud (0.3); analysis of issues regarding turnover and confer with AM counsel regarding same (1.3).	Del Castillo, Joshua	1.80	981.00	1,956.50	WO	HD	TR	_____
01/17/24	9480584	Confer with J. Robichaud regarding Judd Trust turnover issues (0.5); emails with co-counsel at GT regarding same (0.1); review documents associated with subject accounts (0.5).	Del Castillo, Joshua	1.10	599.50	2,556.00	WO	HD	TR	_____

04/09/24 13:37:53 PROFORMA STATEMENT FOR MATTER 392775.00003 (Winkler, Geoff - Receiver for J&amp;J Consul) (Asset Recovery &amp; Management)

**Fees for Matter 392775.00003.(Asset Recovery & Management)**

<b>Trans Date</b>	<b>Index</b>	<b>Description of Service Rendered</b>	<b>Timekeeper</b>	<b>Hours</b>	<b>Fees</b>	<b>Sum</b>	<b>Circle</b>	<b>Action</b>		
01/17/24	9480689	Review documents relating to Judd Nevada Trust Credit One accounts and correspondence with client regarding same (.6); draft turnover letter to transmit to Credit Union (1.0); confer with J. del Castillo regarding same (.2).	Robichaud, James	1.80	801.00	3,357.00	WO	HD	TR	_____
01/18/24	9481959	Review and revise renewed and supplemental turnover demands and confer with AM counsel regarding same (1.7); emails to Receiver's office regarding same (0.3).	Del Castillo, Joshua	2.00	1,090.00	4,447.00	WO	HD	TR	_____
01/19/24	9483186	Review and revise turnover demands and confer with J. Robichaud regarding same (0.3).	Del Castillo, Joshua	0.30	163.50	4,610.50	WO	HD	TR	_____
01/19/24	9485342	Revise turnover demand letter to Credit Union regarding accounts held by Judd Nevada Trust and arrange for sending via Fedex overnight (.9).	Robichaud, James	0.90	400.50	5,011.00	WO	HD	TR	_____
01/23/24	9487608	Confer with J. Robichaud regarding outstanding turnover demand and follow-up regarding same (0.5).	Del Castillo, Joshua	0.50	272.50	5,283.50	WO	HD	TR	_____
01/25/24	9490065	Review and respond to correspondence from Receiver's office regarding asset turnover issue and review documents regarding same (0.5).	Del Castillo, Joshua	0.50	272.50	5,556.00	WO	HD	TR	_____
02/06/24	9531686	Confer with J. Robichaud regarding prospective third party claim and follow-up analysis regarding same (0.8).	Del Castillo, Joshua	0.80	436.00	5,992.00	WO	HD	TR	_____

04/09/24 13:37:53 PROFORMA STATEMENT FOR MATTER 392775.00003 (Winkler, Geoff - Receiver for J&amp;J Consul) (Asset Recovery &amp; Management)

**Fees for Matter 392775.00003.(Asset Recovery & Management)**

<b>Trans Date</b>	<b>Index</b>	<b>Description of Service Rendered</b>	<b>Timekeeper</b>	<b>Hours</b>	<b>Fees</b>	<b>Sum</b>	<b>Circle Action</b>			
02/08/24	9507634	Review correspondence from J. Robichaud and confer regarding analysis of prospective recovery claim (0.5).	Del Castillo, Joshua	0.50	272.50	6,264.50	WO	HD	TR	_____
02/09/24	9508276	Confer with J. Robichaud regarding prospective turnover claim and supplemental legal analysis regarding same (0.9).	Del Castillo, Joshua	0.90	490.50	6,755.00	WO	HD	TR	_____
02/14/24	9515021	Review documents relating to outstanding receivership assets (0.5); emails to M. Pham and J. Robichaud regarding asset recovery / disposition analysis and confer regarding same (0.7).	Del Castillo, Joshua	1.20	654.00	7,409.00	WO	HD	TR	_____
02/22/24	9535098	Cross reference Grace Radke's spreadsheet regarding outstanding items from banks with follow-up letters and subpoenas (1.8)	Pham, Matt D.	1.80	801.00	8,210.00	WO	HD	TR	_____

**Proforma Summary****Timekeeper**

<b>Number</b>	<b>Timekeeper</b>	<b>Hours</b>	<b>Rate</b>	<b>Amounts</b>
001842	Del Castillo, Joshua	10.90	545.00	5,940.50
002510	Pham, Matt D.	2.40	445.00	1,068.00
002592	Robichaud, James	2.70	445.00	1,201.50
		16.00		\$8,210.00
Subtotal Fees				\$8,210.00
Discount				0.00
Total Fees				8,210.00
Total Disbursements				0.00

**Attorney Billing Instructions**

( ) BILL ALL

( ) Hold



04/09/24 13:37:53 PROFORMA STATEMENT FOR MATTER 392775.00003 (Winkler, Geoff - Receiver for J&J Consul) (Asset Recovery & Management)

( ) BILL FEES ONLY  
 ( ) BILL COST ONLY

( ) Write Off  
 ( ) Transfer All

**Billing Instructions**

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

**Account Summary – As Of 04/04/24**

	Fiscal YTD			Calendar YTD			LTD		
	Total	Fees	Disb.	Total	Fees	Disb.	Total	Fees	Disbursements
Worked	16,385.00	16,385.00	0.00	10,935.00	10,935.00	0.00	202,927.50	202,927.50	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	41,050.50	41,050.50	0.00	926.50	926.50	0.00	187,500.57	187,500.57	0.00
Collected	41,050.50	41,050.50	0.00	926.50	926.50	0.00	187,500.57	187,500.57	0.00
AR Write Off	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00
	<b>Total</b>	<b>Fees</b>	<b>Costs</b>						
<i>WIP Balance</i>	<b>10,935.00</b>	<b>10,935.00</b>	<b>0.00</b>						
<i>AR Balance</i>	<b>0.00</b>	<b>0.00</b>	<b>0.00</b>						
<i>Unalloc Payment</i>	<b>0.00</b>								
<i>Client Trust Balance</i>	<b>0.00</b>								

**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

04/09/24 13:37:55 PROFORMA STATEMENT FOR MATTER 392775.00004 (Winkler, Geoff - Receiver for J&amp;J Consul) (Investigation &amp; Reporting)

**Preliminary Billing Form**Billing Atty: 001842 - Del Castillo,  
Joshua

Matter #: 392775.00004

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

Date of Last Billing: 12/26/23

Matter Name: Investigation &amp; Reporting

Proforma Number: 1269755

Client/Matter Joint Group # 392775.1

Client Matter Number:

**Fees for Matter 392775.00004.(Investigation & Reporting)**

<b>Trans Date</b>	<b>Index</b>	<b>Description of Service Rendered</b>	<b>Timekeeper</b>	<b>Hours</b>	<b>Fees</b>	<b>Sum</b>	<b>Circle</b>	<b>Action</b>		
01/02/24	9465582	Review documents from Wells Fargo and Bank of America representatives regarding pending productions and confer regarding same (0.6); review recent court filings and orders and prepare sections for Receiver's next interim report (1.4); correspondence with co-counsel and Receiver's office regarding same (0.3).	Del Castillo, Joshua	2.30	1,253.50	1,253.50	WO	HD	TR	_____
01/03/24	9466639	Emails and teleconferences with bank representatives and M. Pham regarding pending document subpoenas and productions (0.5); prepare outline for prospective meet and confer demand (0.6).	Del Castillo, Joshua	1.10	599.50	1,853.00	WO	HD	TR	_____
01/03/24	9466732	Correspondence with AM counsel regarding interim report (0.5).	Del Castillo, Joshua	0.50	272.50	2,125.50	WO	HD	TR	_____
01/04/24	9468306	Review and respond to correspondence from GT co-counsel regarding discovery follow-up demand from attorney R. Clukey (0.2); review notes regarding subpoenas in issue (0.2); emails to Receiver's office regarding same (0.2).	Del Castillo, Joshua	0.60	327.00	2,452.50	WO	HD	TR	_____

04/09/24 13:37:55 PROFORMA STATEMENT FOR MATTER 392775.00004 (Winkler, Geoff - Receiver for J&amp;J Consul) (Investigation &amp; Reporting)

**Fees for Matter 392775.00004.(Investigation & Reporting)**

<b>Trans Date</b>	<b>Index</b>	<b>Description of Service Rendered</b>	<b>Timekeeper</b>	<b>Hours</b>	<b>Fees</b>	<b>Sum</b>	<b>Circle Action</b>			
01/08/24	9471019	Follow-up emails and calls to bank counsel regarding outstanding document productions (1.0); correspondence regarding atty Clukey demands regarding subpoenas (0.2); review K. Hendricks' response (0.1).	Del Castillo, Joshua	1.30	708.50	3,161.00	WO	HD	TR	_____
01/08/24	9473956	Several emails and conference with counsel concerning the outstanding requests for bank records.	Zaro, David	0.30	163.50	3,324.50	WO	HD	TR	_____
01/08/24	9477811	Prepare additional subpoenas and follow-up requests for various banks and financial institutions	Pham, Matt D.	3.40	1,513.00	4,837.50	WO	HD	TR	_____
01/10/24	9477820	Email correspondence with Grace Radke regarding Citibank production (0.2); Email correspondence with Grace Radke regarding status updates on various document productions (0.2)	Pham, Matt D.	0.40	178.00	5,015.50	WO	HD	TR	_____
01/11/24	9474565	Review and respond to correspondence from Receiver's office and M. Pham regarding status of outstanding document productions (0.7), additional subpoena requests (0.3), and forensic accounting matters (0.3); review materials transmitted by Receiver's office (0.2).	Del Castillo, Joshua	1.50	817.50	5,833.00	WO	HD	TR	_____
01/11/24	9475086	Review outstanding discovery requests and begin drafting follow-ups as needed (1.7).	Robichaud, James	1.70	756.50	6,589.50	WO	HD	TR	_____
01/11/24	9475799	Evaluate issues and responses from banks and scope of responses per client emails (.4). follow-up call with counsel related to	Zaro, David	0.60	327.00	6,916.50	WO	HD	TR	_____

04/09/24 13:37:55 PROFORMA STATEMENT FOR MATTER 392775.00004 (Winkler, Geoff - Receiver for J&amp;J Consul) (Investigation &amp; Reporting)

**Fees for Matter 392775.00004.(Investigation & Reporting)**

<b>Trans Date</b>	<b>Index</b>	<b>Description of Service Rendered</b>	<b>Timekeeper</b>	<b>Hours</b>	<b>Fees</b>	<b>Sum</b>	<b>Circle Action</b>			
		the accounting and timing for forensic report (.2).								
01/11/24	9477822	Phone call with Bank of America representative regarding status of document production (0.3); Email correspondence with Jennifer Floyd regarding status of Bank of America document production (0.3)	Pham, Matt D.	0.60	267.00	7,183.50	WO	HD	TR	_____
01/12/24	9475991	Emails and teleconference with M. Pham regarding pending and outstanding discovery (0.3); review correspondence and schedule from Wells Fargo counsel regarding same (0.2); respond to inquiries from Receiver's office (0.4).	Del Castillo, Joshua	0.90	490.50	7,674.00	WO	HD	TR	_____
01/12/24	9476131	Review productions and prepare follow-up letters (1.6).	Robichaud, James	1.60	712.00	8,386.00	WO	HD	TR	_____
01/15/24	9477550	Prepare additional subpoenas (.5).	Robichaud, James	0.50	222.50	8,608.50	WO	HD	TR	_____
01/16/24	9479242	Draft additional subpoena (.5); confer with J. del Castillo regarding discovery pertaining to Judd Trust account (.2).	Robichaud, James	0.70	311.50	8,920.00	WO	HD	TR	_____
01/22/24	9488729	Several emails, call with counsel related to the accounting/subpoena status and follow-up.	Zaro, David	0.40	218.00	9,138.00	WO	HD	TR	_____
01/23/24	9487607	Review correspondence regarding outstanding document recovery efforts and emails with M. Pham and J. Robichaud regarding same (0.3); review tracking chart and prepare follow-up inquiries (0.3); email	Del Castillo, Joshua	0.70	381.50	9,519.50	WO	HD	TR	_____

04/09/24 13:37:55 PROFORMA STATEMENT FOR MATTER 392775.00004 (Winkler, Geoff - Receiver for J&amp;J Consul) (Investigation &amp; Reporting)

**Fees for Matter 392775.00004.(Investigation & Reporting)**

<b>Trans Date</b>	<b>Index</b>	<b>Description of Service Rendered</b>	<b>Timekeeper</b>	<b>Hours</b>	<b>Fees</b>	<b>Sum</b>	<b>Circle Action</b>			
		to co-counsel (0.1).								
01/27/24	9493204	Follow-up emails to AM counsel regarding outstanding turnover demands (0.4); attention to issues regarding same (0.2).	Del Castillo, Joshua	0.60	327.00	9,846.50	WO	HD	TR	_____
01/27/24	9493208	Emails to AM counsel regarding pending subpoenas and document demands (0.7); review correspondence from Receiver's office regarding same (0.5).	Del Castillo, Joshua	1.20	654.00	10,500.50	WO	HD	TR	_____
01/29/24	9494430	Review correspondence with G. Radke and draft subpoena for newly identified Prudential account (.6); review latest information provided by G. Radke (.2).	Robichaud, James	0.80	356.00	10,856.50	WO	HD	TR	_____
01/29/24	9499178	Continue drafting follow-up letters to various banks regarding missing documents from productions	Pham, Matt D.	3.30	1,468.50	12,325.00	WO	HD	TR	_____
01/30/24	9499180	Prepare correspondence to Bank of America regarding authorized points of contact	Pham, Matt D.	0.50	222.50	12,547.50	WO	HD	TR	_____
01/31/24	9496694	Review and comment on draft interim report (0.9); review and confer regarding GT comments (0.3); review documents received in connection with outstanding document demands as relate to certain receivership assets (3.4).	Del Castillo, Joshua	4.60	2,507.00	15,054.50	WO	HD	TR	_____
01/31/24	9497258	Confer with M. Pham regarding outstanding discovery matters (.5).	Robichaud, James	0.50	222.50	15,277.00	WO	HD	TR	_____
01/31/24	9499202	Review of document production from US Bank and email correspondence with Grace	Pham, Matt D.	0.40	178.00	15,455.00	WO	HD	TR	_____

04/09/24 13:37:55 PROFORMA STATEMENT FOR MATTER 392775.00004 (Winkler, Geoff - Receiver for J&amp;J Consul) (Investigation &amp; Reporting)

**Fees for Matter 392775.00004.(Investigation & Reporting)**

<b>Trans Date</b>	<b>Index</b>	<b>Description of Service Rendered</b>	<b>Timekeeper</b>	<b>Hours</b>	<b>Fees</b>	<b>Sum</b>	<b>Circle</b>	<b>Action</b>		
		Radke regarding same (0.2); Confer with James Robichaud regarding additional subpoenas and follow-up letters to banks (0.2)								
02/01/24	9503908	Draft additional follow-up letters for transmittal and revise past subpoenas to incorporate additional new accounts (1.9).	Robichaud, James	1.90	845.50	16,300.50	WO	HD	TR	_____
02/02/24	9502058	Review and respond to correspondence from AM counsel regarding pending and outstanding discovery requests (0.5).	Del Castillo, Joshua	0.50	272.50	16,573.00	WO	HD	TR	_____
02/06/24	9505207	Follow-up with M. Pham and J. Robichaud regarding outstanding discovery and document turnover issues and correspondence to Receiver's office regarding same (0.7).	Del Castillo, Joshua	0.70	381.50	16,954.50	WO	HD	TR	_____
02/08/24	9518164	Continue drafting Beasley discovery documents - letters and subpoenas (2.4).	Robichaud, James	2.40	1,068.00	18,022.50	WO	HD	TR	_____
02/09/24	9508957	Teleconference with bank counsel regarding pending document production requests (0.5); follow-up emails to M. Pham and J. Robichaud regarding same (0.5).	Del Castillo, Joshua	1.00	545.00	18,567.50	WO	HD	TR	_____
02/09/24	9518165	Continue drafting Beasley discovery documents - letters and subpoenas (1.9).	Robichaud, James	1.90	845.50	19,413.00	WO	HD	TR	_____
02/12/24	9512038	Confer with M. Pham regarding pending follow-up efforts in connection with outstanding discovery (0.3); emails to Receiver's office regarding forensic accounting matters (0.2); review notes regarding same (0.2).	Del Castillo, Joshua	0.70	381.50	19,794.50	WO	HD	TR	_____

04/09/24 13:37:55 PROFORMA STATEMENT FOR MATTER 392775.00004 (Winkler, Geoff - Receiver for J&amp;J Consul) (Investigation &amp; Reporting)

**Fees for Matter 392775.00004.(Investigation & Reporting)**

<b>Trans Date</b>	<b>Index</b>	<b>Description of Service Rendered</b>	<b>Timekeeper</b>	<b>Hours</b>	<b>Fees</b>	<b>Sum</b>	<b>Circle</b>	<b>Action</b>		
02/12/24	9519904	Review and analyze drafts of subpoenas and follow-up letters prepared by James Robichaud	Pham, Matt D.	1.00	445.00	20,239.50	WO	HD	TR	_____
02/13/24	9513059	Follow-ups with M. Pham regarding supplemental subpoenas (0.3).	Del Castillo, Joshua	0.30	163.50	20,403.00	WO	HD	TR	_____
02/15/24	9515499	Review email from Receiver's office regarding transition of WF subpoena matters and confer with M. Pham regarding same (0.5).	Del Castillo, Joshua	0.50	272.50	20,675.50	WO	HD	TR	_____
02/16/24	9516144	Emails and teleconferences with D. Zaro and M. Pham regarding current set of discovery and subpoenas and Receiver discovery transition plan (0.5).	Del Castillo, Joshua	0.50	272.50	20,948.00	WO	HD	TR	_____
02/21/24	9521351	Confer with M. Pham regarding outstanding and anticipated discovery requests and subpoenas (0.5).	Del Castillo, Joshua	0.50	272.50	21,220.50	WO	HD	TR	_____
02/21/24	9527015	Meet with AFS staff regarding outstanding document production follow-up tasks (.5).	Robichaud, James	0.50	222.50	21,443.00	WO	HD	TR	_____
02/22/24	9527205	Finalize revised subpoenas and subpoena follow-ups for Chase, Wells Fargo, and US Bank in accordance with request of GR (2.0).	Robichaud, James	2.00	890.00	22,333.00	WO	HD	TR	_____
02/23/24	9523855	Confer with M. Pham regarding subpoena transition agreement with Receiver's office and analysis of issues presented by same (1.1); review emails from Receiver's office regarding WF production and attention to issues regarding same (0.5).	Del Castillo, Joshua	1.60	872.00	23,205.00	WO	HD	TR	_____

04/09/24 13:37:55 PROFORMA STATEMENT FOR MATTER 392775.00004 (Winkler, Geoff - Receiver for J&amp;J Consul) (Investigation &amp; Reporting)

**Fees for Matter 392775.00004.(Investigation & Reporting)**

<b>Trans Date</b>	<b>Index</b>	<b>Description of Service Rendered</b>	<b>Timekeeper</b>	<b>Hours</b>	<b>Fees</b>	<b>Sum</b>	<b>Circle Action</b>			
02/23/24	9525941	Review and analyze prior subpoena to Wells Fargo and production in response thereto and draft email correspondence with Grace Radke regarding same	Pham, Matt D.	1.00	445.00	23,650.00	WO	HD	TR	_____
02/23/24	9526422	Review/respond to email communications related to the subpoenas and strategy to enforce and expedite discovery.	Zaro, David	0.60	327.00	23,977.00	WO	HD	TR	_____
02/26/24	9534941	Phone call with City FCU regarding subpoena (0.1); Review latest version of Grace Radke's spreadsheet regarding outstanding items from banks and begin preparing additional follow up letters and subpoenas (1.4)	Pham, Matt D.	1.50	667.50	24,644.50	WO	HD	TR	_____
02/27/24	9528102	Review client communication regarding outstanding discovery and confer with D. Zaro and M. Pham regarding same (0.5); review correspondence from WF counsel regarding discovery follow-up and emails with M. Pham regarding same (0.3); review history and summary of discovery and compare to request for updates from Receiver's office (1.0).	Del Castillo, Joshua	1.80	981.00	25,625.50	WO	HD	TR	_____
02/27/24	9528846	Finalize all outstanding letters and subpoenas (1.7); complete inventory of all items listed in GR's 2/21/24 spreadsheet and confirm that all have been transmitted (1.1).	Robichaud, James	2.80	1,246.00	26,871.50	WO	HD	TR	_____
02/27/24	9529497	Follow-up with counsel related to strategy to enforce subpoenas/WFB records production and review, respond to emails.	Zaro, David	0.60	327.00	27,198.50	WO	HD	TR	_____



04/09/24 13:37:55 PROFORMA STATEMENT FOR MATTER 392775.00004 (Winkler, Geoff - Receiver for J&amp;J Consul) (Investigation &amp; Reporting)

**Fees for Matter 392775.00004.(Investigation & Reporting)**

<b>Trans Date</b>	<b>Index</b>	<b>Description of Service Rendered</b>	<b>Timekeeper</b>	<b>Hours</b>	<b>Fees</b>	<b>Sum</b>	<b>Circle Action</b>			
02/27/24	9534965	Prepare, revise, and finalize additional subpoenas to Chase, US Bank, and Wells Fargo (1.7); Prepare, revise, and finalize follow up letters to Citibank, US Bank, Wells Fargo, and Chase (2.9); Review latest version of Grace Radke's spreadsheet to determine outstanding requests (0.8); Email correspondence with Grace Radke regarding status of subpoenas and follow up letters and internal procedure moving forward (0.5)	Pham, Matt D.	5.90	2,625.50	29,824.00	WO	HD	TR	_____
02/28/24	9529188	Attention to issues regarding Receiver's office requests regarding forthcoming discovery and confer with AM counsel regarding same (0.6); emails regarding same (0.2); review response from Wells Fargo counsel to follow-up request and emails to Receiver's office and M. Pham regarding same (0.4).	Del Castillo, Joshua	1.20	654.00	30,478.00	WO	HD	TR	_____
02/28/24	9529468	Review East West Bank and Paypal productions and confer with G. Radke regarding same (.5).	Robichaud, James	0.50	222.50	30,700.50	WO	HD	TR	_____
02/28/24	9531306	Further review and evaluation of the email communications with Receiver office and counsel related to discovery, follow-up advice related to enforcement of subpoenas.	Zaro, David	0.40	218.00	30,918.50	WO	HD	TR	_____
02/28/24	9534989	Email correspondence with BNY Mellon and Barclays regarding subpoenas and email correspondence with Grace Radke regarding Barclays, Discover, BNY Mellon	Pham, Matt D.	2.60	1,157.00	32,075.50	WO	HD	TR	_____

04/09/24 13:37:55 PROFORMA STATEMENT FOR MATTER 392775.00004 (Winkler, Geoff - Receiver for J&amp;J Consul) (Investigation &amp; Reporting)

**Fees for Matter 392775.00004.(Investigation & Reporting)**

<b>Trans Date</b>	<b>Index</b>	<b>Description of Service Rendered</b>	<b>Timekeeper</b>	<b>Hours</b>	<b>Fees</b>	<b>Sum</b>	<b>Circle Action</b>				
		(0.9); Email correspondence with Mountain America Credit Union representative regarding outstanding bank records (0.6); Confer with James Robichaud regarding PayPal/Venmo accounts and East West Bank account (0.4); Cursory review of document productions from Citibank, Washington Trust, and Mountain America Credit Union (0.5); Email correspondence with Grace Radke regarding supplemental productions from Citibank, Washington Trust, and Mountain America Credit Union (0.2)									
02/29/24	9530775	Confer with D. Zaro and M. Pham regarding Receiver's office requests regarding pending and outstanding discovery, and follow-up regarding GT requests regarding document production matters (0.8); emails with AM counsel and Receiver's office regarding same (0.2); confer regarding forensic accounting inquiry from GT (0.5).	Del Castillo, Joshua	1.50	817.50	32,893.00	WO	HD	TR	_____	
02/29/24	9531379	Further conferences with counsel and review of emails related to the Receiver's accounting and brief call with Receiver.	Zaro, David	0.40	218.00	33,111.00	WO	HD	TR	_____	
02/29/24	9535028	Prepare form letter to banks regarding authorized points of contact and email correspondence with Grace Radke regarding same and subpoenas (0.7)	Pham, Matt D.	0.70	311.50	33,422.50	WO	HD	TR	_____	
03/04/24	9537437	Confer with G. Radke regarding past document requests for certain accounts (.5).	Robichaud, James	0.50	222.50	33,645.00	WO	HD	TR	_____	

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**Fees for Matter 392775.00004.(Investigation & Reporting)**

<b>Trans Date</b>	<b>Index</b>	<b>Description of Service Rendered</b>	<b>Timekeeper</b>	<b>Hours</b>	<b>Fees</b>	<b>Sum</b>	<b>Circle</b>	<b>Action</b>		
03/04/24	9537956	Emails with Receiver's office and AM counsel regarding outstanding discovery and follow-up to producing banks (0.5).	Del Castillo, Joshua	0.50	272.50	33,917.50	WO	HD	TR	_____
03/05/24	9538102	Correspond with G. Radke concerning pending discovery (.8); prepare updated subpoena to Citibank to incorporate new address for service of process (.3); draft and revise additional subpoenas for Wells and Bank of America (1.0); prepare follow-ups on Wells transactions identified by G. Radke (1.5); prepare follow-ups for US Bank (.6); compare documents and accounts subject to current set of requests to pending requests to eliminate duplicates (.7); confirm that WF 2894 account request was previously included in WF subpoena #3 (.2); compile set of all formal follow-up letters and faxes to date (.8).	Robichaud, James	5.90	2,625.50	36,543.00	WO	HD	TR	_____
03/05/24	9538266	Prepare for and videoconference with Receiver's office regarding outstanding discovery issues (0.6); review file and correspondence from Wells counsel regarding same and transmit materials to Receiver (0.2); emails and teleconferences with M. Pham and J. Robichaud regarding materials due to Receiver (0.9).	Del Castillo, Joshua	1.70	926.50	37,469.50	WO	HD	TR	_____
03/05/24	9544061	Confer with Josh del Castillo regarding subpoenas and follow-up letters to banks (0.2); Virtually meet with Jennifer Floyd and Josh del Castillo regarding US Bank and Wells Fargo outstanding requests (0.4); Email correspondence with Enterprise Bank regarding follow-up request (0.2); Email	Pham, Matt D.	1.90	845.50	38,315.00	WO	HD	TR	_____

04/09/24 13:37:55 PROFORMA STATEMENT FOR MATTER 392775.00004 (Winkler, Geoff - Receiver for J&amp;J Consul) (Investigation &amp; Reporting)

**Fees for Matter 392775.00004.(Investigation & Reporting)**

Trans Date	Index	Description of Service Rendered	Timekeeper	Hours	Fees	Sum	Circle	Action		
		correspondence with Grace Radke regarding status of Horizon Trust document production (0.2); Review status of outstanding subpoenas and follow-up letters (0.9)								
03/06/24	9539488	Provide copies of follow-up letters to banks to AFS (.2); revise the Bank of America to add sections 2 and 3 (.6).	Robichaud, James	0.80	356.00	38,671.00	WO	HD	TR	_____
03/06/24	9540666	Several meetings, call with counsel related to the subpoenas, the remedies for Receiver to gain expedited turnover of records.	Zaro, David	0.80	436.00	39,107.00	WO	HD	TR	_____
03/06/24	9544069	Email correspondence with Grace Radke regarding manner of service of subpoena to Bank of America (0.3); Phone call with Fidelity's in-house counsel regarding subpoena (0.1); Phone call with John Hall regarding Bank of America production (0.1)	Pham, Matt D.	0.50	222.50	39,329.50	WO	HD	TR	_____
03/07/24	9540478	Finalize and transmit new Bank of America subpoena (.3); review additional follow-up requests (.5).	Robichaud, James	0.80	356.00	39,685.50	WO	HD	TR	_____
03/07/24	9541557	Calls/emails with counsel and review of Receiver agenda related to pending matters/accounting.	Zaro, David	0.20	109.00	39,794.50	WO	HD	TR	_____
03/07/24	9544076	Review of document productions from Charles Schwab and City National Bank (0.4); Email correspondence with Grace Radke regarding document productions from Schwab and City National Bank (0.2); Email correspondence with Fidelity	Pham, Matt D.	2.70	1,201.50	40,996.00	WO	HD	TR	_____

04/09/24 13:37:55 PROFORMA STATEMENT FOR MATTER 392775.00004 (Winkler, Geoff - Receiver for J&amp;J Consul) (Investigation &amp; Reporting)

**Fees for Matter 392775.00004.(Investigation & Reporting)**

<b>Trans Date</b>	<b>Index</b>	<b>Description of Service Rendered</b>	<b>Timekeeper</b>	<b>Hours</b>	<b>Fees</b>	<b>Sum</b>	<b>Circle Action</b>			
		regarding additional point of contact (0.1); Phone call with Citi's representative regarding subpoena and follow-up requests (0.1); Email correspondence with Citi's representative regarding clarification on subpoena and follow-up requests (0.5); Review and revise draft of subpoena to Bank of America (0.2); Virtually meet with Krista Freitag and Ted Fates regarding status of social media captures and subpoenas (1.0); Email correspondence with Grace Radke regarding service of subpoena on Bank of America (0.2)								
03/08/24	9541410	Review correspondence from Receiver's office regarding follow-ups to WF productions and prepare response (0.2); emails and teleconferences with AM counsel regarding discovery follow-up status and procedures (0.8).	Del Castillo, Joshua	1.00	545.00	41,541.00	WO	HD	TR	_____
03/08/24	9544093	Confer with Josh del Castillo regarding client's inquiry relating to follow-up requests to banks (0.1); Phone with Citi's representative regarding subpoena and follow-up requests (0.1); Email correspondence with Citi's representative regarding additional point of contact (0.2); Email correspondence with Grace Radke regarding results of TD Bank's search for accounts (0.2); Email correspondence with Grade Radke regarding Seth Johnson accounts (0.2)	Pham, Matt D.	0.80	356.00	41,897.00	WO	HD	TR	_____
03/08/24	9544103	Conference call with David Cluckey, Casey Fronk, and Kara Hendricks regarding	Pham, Matt D.	0.20	89.00	41,986.00	WO	HD	TR	_____

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**Fees for Matter 392775.00004.(Investigation & Reporting)**

<b>Trans Date</b>	<b>Index</b>	<b>Description of Service Rendered</b>	<b>Timekeeper</b>	<b>Hours</b>	<b>Fees</b>	<b>Sum</b>	<b>Circle</b>	<b>Action</b>		
		outstanding subpoenas to banks								
03/08/24	9544255	Evaluate and investigate issues related to email from Receiver office regarding Wells Fargo Bank records and issues concerning the production, follow-up on prior communications (.4). Advice to counsel as to Wells Fargo Bank records production/expediting production/responses to emails (.5).	Zaro, David	0.90	490.50	42,476.50	WO	HD	TR	_____
03/08/24	9553760	Confer with G. Radke regarding pending Bank of America subpoena (.5).	Robichaud, James	0.50	222.50	42,699.00	WO	HD	TR	_____
03/11/24	9552322	Review of document production from Charles Schwab and email correspondence with Grace Radke regarding same (0.3); Email correspondence with Grace Radke regarding Seth Johnson bank accounts (0.2)	Pham, Matt D.	0.50	222.50	42,921.50	WO	HD	TR	_____
03/12/24	9546980	Review correspondence from Receiver's office and confer with M. Pham and J. Robichaud regarding outstanding discovery issues and status (0.7); review subpoenas (0.3).	Del Castillo, Joshua	1.00	545.00	43,466.50	WO	HD	TR	_____
03/12/24	9552331	Review and analyze prior stipulated protective orders and email correspondence with co-counsel regarding same (0.2); Review prior correspondence regarding Bank of America document productions (0.5)	Pham, Matt D.	0.70	311.50	43,778.00	WO	HD	TR	_____
03/13/24	9547133	Review inquiry from Receiver regarding document production matters and confer	Del Castillo, Joshua	2.60	1,417.00	45,195.00	WO	HD	TR	_____

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**Fees for Matter 392775.00004.(Investigation & Reporting)**

<b>Trans Date</b>	<b>Index</b>	<b>Description of Service Rendered</b>	<b>Timekeeper</b>	<b>Hours</b>	<b>Fees</b>	<b>Sum</b>	<b>Circle Action</b>				
		with counsel regarding same (0.5); review document upload history for all subpoenas and work with counsel and lit support to confirm as against DISCO and Box upload histories (1.1); emails with Receiver and D. Zaro regarding same (0.5); conference with M. Pham regarding discovery procedures and associated matters (0.5).									
03/13/24	9551428	Several emails/calls and investigation related to the Bank of America subpoena, production and advice to counsel.	Zaro, David	0.70	381.50	45,576.50	WO	HD	TR	_____	
03/13/24	9552340	Phone call with Chase representative regarding subpoena and follow-up request and email correspondence with Grace Radke regarding same	Pham, Matt D.	0.50	222.50	45,799.00	WO	HD	TR	_____	
03/14/24	9548204	Teleconference and emails with Receiver regarding discovery issues and Bank of America voicemail (0.3); confer with M. Pham and J. Robichaud regarding outstanding discovery matters (0.5); review subpoenas and follow-up correspondence to banks (0.6); analysis of issues regarding prospective SEC subpoena and alternative production scenarios, and confer with AM attorneys regarding same (1.3).	Del Castillo, Joshua	2.70	1,471.50	47,270.50	WO	HD	TR	_____	
03/14/24	9551854	Work with counsel related to the strategy as to production to SEC and call/email to advise counsel (.5). Call/email related to the BofA account documents and follow-up as to next steps (.8).	Zaro, David	1.30	708.50	47,979.00	WO	HD	TR	_____	

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**Fees for Matter 392775.00004.(Investigation & Reporting)**

<b>Trans Date</b>	<b>Index</b>	<b>Description of Service Rendered</b>	<b>Timekeeper</b>	<b>Hours</b>	<b>Fees</b>	<b>Sum</b>	<b>Circle</b>	<b>Action</b>		
03/14/24	9552353	Phone call with US Bank's counsel regarding subpoenas and follow-up requests (0.1); Confer with Josh del Castillo regarding document production and other issues (0.3)	Pham, Matt D.	0.40	178.00	48,157.00	WO	HD	TR	_____
03/15/24	9549278	Follow-up with M. Pham regarding Bank of America inquiry in connection with subpoena and Receiver's office follow-up and attention to issues regarding same (0.5).	Del Castillo, Joshua	0.50	272.50	48,429.50	WO	HD	TR	_____
03/15/24	9552359	Phone call with Chase representative regarding subpoenas and follow-up requests and email correspondence with Grace Radke regarding same (0.3); Cursory review of document productions from One Nevada Credit Union, Mountain America Credit Union, Fidelity Workplace Services and email correspondence with Grace Radke regarding same (0.6);	Pham, Matt D.	0.90	400.50	48,830.00	WO	HD	TR	_____
03/18/24	9551887	Emails with M. Pham and Receiver's office regarding recent document productions (0.3); follow-up discussion regarding same (0.3); confer with M. Pham regarding SEC subpoena and alternative (0.3).	Del Castillo, Joshua	0.90	490.50	49,320.50	WO	HD	TR	_____
03/18/24	9559758	Review of latest document production from Wells Fargo and email correspondence with Jen Floyd regarding same (0.4); Email correspondence with US Bank's and Wells Fargo's counsel regarding Receiver's productions to SEC (0.2)	Pham, Matt D.	0.60	267.00	49,587.50	WO	HD	TR	_____



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**Fees for Matter 392775.00004.(Investigation & Reporting)**

<b>Trans Date</b>	<b>Index</b>	<b>Description of Service Rendered</b>	<b>Timekeeper</b>	<b>Hours</b>	<b>Fees</b>	<b>Sum</b>	<b>Circle</b>	<b>Action</b>		
03/19/24	9554345	Review and respond to status inquiry regarding discovery from co-counsel (0.1); confer with M. Pham regarding bank follow-up (0.2); emails with M. Pham and bank counsel (0.3).	Del Castillo, Joshua	0.60	327.00	49,914.50	WO	HD	TR	_____
03/19/24	9559776	Email correspondence with Chase representative regarding subpoena (0.3); Cursory review of document production from City & Police Federal Credit Union and email correspondence with Grace Radke regarding same (0.2)	Pham, Matt D.	0.50	222.50	50,137.00	WO	HD	TR	_____
03/20/24	9555295	Prepare for and videoconference with counsel for U.S. Bank regarding document production request (0.3); confer with M. Pham regarding same (0.3); email to K. Hendricks and Receiver regarding same (0.1); review protective order and analysis of issues presented by prospective voluntary production (0.9); call with K. Henricks regarding same (0.2).	Del Castillo, Joshua	1.60	872.00	51,009.00	WO	HD	TR	_____
03/20/24	9555383	Correspond with J. Floyd regarding outstanding document production requests dated 3/11, and demand letters to US Bank and WF dated 2/27 (0.7).	Robichaud, James	0.70	311.50	51,320.50	WO	HD	TR	_____
03/20/24	9559785	Virtually meet with Joel Hammerman and Josh del Castillo regarding Receiver's production of US Bank records to SEC	Pham, Matt D.	0.20	89.00	51,409.50	WO	HD	TR	_____
03/21/24	9557427	Review correspondence from Receiver's office regarding additional discovery and inquiries and confer with M. Pham and J. Robichaud regarding same (0.5); follow-up	Del Castillo, Joshua	1.00	545.00	51,954.50	WO	HD	TR	_____

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**Fees for Matter 392775.00004.(Investigation & Reporting)**

<b>Trans Date</b>	<b>Index</b>	<b>Description of Service Rendered</b>	<b>Timekeeper</b>	<b>Hours</b>	<b>Fees</b>	<b>Sum</b>	<b>Circle</b>	<b>Action</b>		
		regarding status of discussions regarding subpoenas with US Bank and Wells Fargo and confer regarding same (0.5).								
03/22/24	9557583	Follow-up regarding additional Receiver inquires to Wells Fargo regarding document production and confer with M. Pham regarding same (0.6); review and respond to correspondence from Wells Fargo counsel (0.2); analysis of request from Wells Fargo counsel and follow-up discussion with M. Pham regarding same (0.6).	Del Castillo, Joshua	1.40	763.00	52,717.50	WO	HD	TR	_____
03/25/24	9561107	Confer with AM counsel regarding Wells Fargo response to document sharing inquiry and analysis of issue raised (0.6); prepare and respond to emails from Receiver and GT counsel regarding same (0.2).	Del Castillo, Joshua	0.80	436.00	53,153.50	WO	HD	TR	_____
03/25/24	9563514	Conference and review status of subpoenas related to the banks, accounting and advice to counsel.	Zaro, David	0.30	163.50	53,317.00	WO	HD	TR	_____
03/25/24	9564331	Review correspondence with J. Floyd and review outstanding discovery requests along with new Subpoena request to be directed to Wells Fargo (.4).	Robichaud, James	0.40	178.00	53,495.00	WO	HD	TR	_____
03/27/24	9563917	Emails and confer with K. Hendricks and M. Pham regarding outstanding inquiries to Bank of America and additional thid party subpoenas (0.5).	Del Castillo, Joshua	0.50	272.50	53,767.50	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	
03/28/24	9565028	Attention to outstanding discovery issues and emails to AM counsel regarding same (0.5).	Del Castillo, Joshua	0.50	272.50	54,040.00	WO	HD	TR
03/28/24	9565118	Review correspondence with J. Floyd relating to Chase accounts and prepare Chase subpoena accordingly (.4); review prior Wells Fargo subpoenas and prepare requested Wells Fargo subpoena for the accounts not previously subpoenaed (.3).	Robichaud, James	0.70	311.50	54,351.50	WO	HD	TR
03/29/24	9566187	Follow-up regarding status inquiries to Wells and US Bank, along with outstanding subpoenas and follow-up discovery requests (0.3); emails with M. Pham and J. Robichaud regarding same (0.3).	Del Castillo, Joshua	0.60	327.00	54,678.50	WO	HD	TR

**Proforma Summary**

**Timekeeper**

Number	Timekeeper	Hours	Rate	Amounts
000313	Zaro, David	7.50	545.00	4,087.50
001842	Del Castillo, Joshua	44.00	545.00	23,980.00
002510	Pham, Matt D.	31.70	445.00	14,106.50
002592	Robichaud, James	28.10	445.00	12,504.50
		<u>111.30</u>		<u>\$54,678.50</u>
Subtotal Fees				\$54,678.50
Discount				0.00
Total Fees				54,678.50
Total Disbursements				0.00

**Attorney Billing Instructions**

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

04/09/24 13:37:55 PROFORMA STATEMENT FOR MATTER 392775.00004 (Winkler, Geoff - Receiver for J&J Consul) (Investigation & Reporting)

**Billing Instructions**

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

**Account Summary – As Of 04/04/24**

	Fiscal YTD			Calendar YTD			LTD		
	Total	Fees	Disb.	Total	Fees	Disb.	Total	Fees	Disbursements
Worked	139,331.00	139,331.00	0.00	62,848.00	62,848.00	0.00	309,454.50	309,454.50	0.00
Unbilled Adj	852.70	852.70	0.00	0.00	0.00	0.00	5,380.20	5,380.20	0.00
Billed	112,090.30	112,090.30	0.00	54,168.80	54,168.80	0.00	241,226.30	241,226.30	0.00
Collected	112,090.30	112,090.30	0.00	54,168.80	54,168.80	0.00	241,226.30	241,226.30	0.00
AR Write Off	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00
	<b>Total</b>	<b>Fees</b>	<b>Costs</b>						
<b>WIP</b>	<b>62,848.00</b>	<b>62,848.00</b>	<b>0.00</b>						
<b>Balance</b>									
<b>AR Balance</b>	<b>0.00</b>	<b>0.00</b>	<b>0.00</b>						
<b>Unalloc</b>	<b>0.00</b>								
<b>Payment</b>									
<b>Client Trust</b>	<b>0.00</b>								
<b>Balance</b>									

**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

04/09/24 13:37:56 PROFORMA STATEMENT FOR MATTER 392775.00005 (Winkler, Geoff - Receiver for J&J Consul) (Investor Issues & Communications)

**Preliminary Billing Form**

Billing Atty: 001842 - Del Castillo, Matter #: 392775.00005 Client Name: Winkler, Geoff - Receiver for J&J Consul  
 Joshua  
 Date of Last Billing: 06/30/23 Matter Name: Investor Issues & Communications  
 Proforma Number: 1269755  
 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
02/28/24	9529677	Review voicemail from and teleconference with purported investor representative (0.8).	Del Castillo, Joshua	0.80	436.00	436.00	WO	HD TR

**Proforma Summary**

Timekeeper Number	Timekeeper	Hours	Rate	Amounts
001842	Del Castillo, Joshua	0.80	545.00	436.00
				\$436.00
Subtotal Fees				\$436.00
Discount				0.00
Total Fees				436.00
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

04/09/24 13:37:56 PROFORMA STATEMENT FOR MATTER 392775.00005 (Winkler, Geoff - Receiver for J&amp;J Consul) (Investor Issues &amp; Communications)

**Account Summary – As Of 04/04/24**

	Fiscal YTD			Calendar YTD			LTD		
	Total	Fees	Disb.	Total	Fees	Disb.	Total	Fees	Disbursements
Worked	436.00	436.00	0.00	436.00	436.00	0.00	6,596.50	6,596.50	0.00
Unbilled Adj	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00
Billed	0.00	0.00	0.00	0.00	0.00	0.00	6,160.50	6,160.50	0.00
Collected	0.00	0.00	0.00	0.00	0.00	0.00	6,160.50	6,160.50	0.00
AR Write Off	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00
	<b>Total</b>	<b>Fees</b>	<b>Costs</b>						
<b>WIP</b>	<b>436.00</b>	<b>436.00</b>	<b>0.00</b>						
<b>Balance</b>									
<b>AR Balance</b>	<b>0.00</b>	<b>0.00</b>	<b>0.00</b>						
<b>Unalloc</b>	<b>0.00</b>								
<b>Payment</b>									
<b>Client Trust</b>	<b>0.00</b>								
<b>Balance</b>									

**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

04/09/24 13:37:58 PROFORMA STATEMENT FOR MATTER 392775.00006 (Winkler, Geoff - Receiver for J&J Consul) (Sale, Disposition & Transfer of Assets)

**Preliminary Billing Form**

Billing Atty: 001842 - Del Castillo, Joshua      Matter #: 392775.00006      Client Name: Winkler, Geoff - Receiver for J&J Consul  
 Date of Last Billing: 12/26/23      Matter Name: Sale, Disposition & Transfer of Assets  
 Proforma Number: 1269755      Client Matter Number:  
 Client/Matter Joint Group # 392775.1

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

Trans Date	Index	Description of Service Rendered	Timekeeper	Hours	Fees	Sum	Circle	Action
02/12/24	9511162	Review and respond to inquiries regarding real property disposition issues (0.6).	Del Castillo, Joshua	0.60	327.00	327.00	WO	HD TR
02/20/24	9525895	Prepare notice of termination of lis pendens with respect to 16 Paradise Valley property	Pham, Matt D.	0.60	267.00	594.00	WO	HD TR

**Proforma Summary**

Timekeeper Number	Timekeeper	Hours	Rate	Amounts
001842	Del Castillo, Joshua	0.60	545.00	327.00
002510	Pham, Matt D.	0.60	445.00	267.00
		<u>1.20</u>		<u>\$594.00</u>
Subtotal Fees				\$594.00
Discount				0.00
Total Fees				594.00
Total Disbursements				0.00

**Attorney Billing Instructions**

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

04/09/24 13:37:58 PROFORMA STATEMENT FOR MATTER 392775.00006 (Winkler, Geoff - Receiver for J&J Consul) (Sale, Disposition & Transfer of Assets)

**Billing Instructions**

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

**Account Summary – As Of 04/04/24**

	Fiscal YTD			Calendar YTD			LTD		
	Total	Fees	Disb.	Total	Fees	Disb.	Total	Fees	Disbursements
Worked	2,615.00	2,615.00	0.00	594.00	594.00	0.00	153,297.50	153,297.50	0.00
Unbilled Adj	0.00	0.00	0.00	0.00	0.00	0.00	782.30	780.80	1.50
Billed	14,283.50	14,283.50	0.00	1,308.00	1,308.00	0.00	151,922.70	151,922.70	0.00
Collected	14,283.50	14,283.50	0.00	1,308.00	1,308.00	0.00	151,922.70	151,922.70	0.00
AR Write Off	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00
	<b>Total</b>	<b>Fees</b>	<b>Costs</b>						
<b>WIP</b>	<b>594.00</b>	<b>594.00</b>	<b>0.00</b>						
<b>Balance</b>									
<b>AR Balance</b>	<b>0.00</b>	<b>0.00</b>	<b>0.00</b>						
<b>Unalloc</b>	<b>0.00</b>								
<b>Payment</b>									
<b>Client Trust</b>	<b>0.00</b>								
<b>Balance</b>									

**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



04/09/24 13:37:59 PROFORMA STATEMENT FOR MATTER 392775.00009 (Winkler, Geoff - Receiver for J&amp;J Consul) (Third Party Claims &amp; Recoveries)

**Preliminary Billing Form**Billing Atty: 001842 - Del Castillo,  
Joshua

Matter #: 392775.00009

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

Date of Last Billing: 12/26/23

Matter Name: Third Party Claims &amp; Recoveries

Proforma Number: 1269755

Client/Matter Joint Group # 392775.1

Client Matter Number:

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

<b>Trans Date</b>	<b>Index</b>	<b>Description of Service Rendered</b>	<b>Timekeeper</b>	<b>Hours</b>	<b>Fees</b>	<b>Sum</b>	<b>Circle</b>	<b>Action</b>		
01/24/24	9492842	Review prior email communications with Eco Battery's and Eco Capital's respective counsel regarding document productions and confidential designations in preparation for discussion with co-counsel	Pham, Matt D.	0.90	400.50	400.50	WO	HD	TR	_____
01/25/24	9490108	Review EcoBattery complaint and confer with M. Pham regarding same (0.6).	Del Castillo, Joshua	0.60	327.00	727.50	WO	HD	TR	_____
01/25/24	9492858	Phone call with Christian Spaulding regarding Eco Battery and Eco Capital document productions and forthcoming complaint	Pham, Matt D.	0.20	89.00	816.50	WO	HD	TR	_____
01/26/24	9492866	Review and analyze Receiver's complaint against Eco Battery and Eco Capital prepared by Greenberg Traurig	Pham, Matt D.	0.60	267.00	1,083.50	WO	HD	TR	_____

**Proforma Summary****Timekeeper**

<b>Number</b>	<b>Timekeeper</b>	<b>Hours</b>	<b>Rate</b>	<b>Amounts</b>
001842	Del Castillo, Joshua	0.60	545.00	327.00
002510	Pham, Matt D.	1.70	445.00	756.50

04/09/24 13:37:59 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
		2.30		\$1,083.50
	Subtotal Fees			\$1,083.50
	Discount			0.00
	Total Fees			1,083.50
	Total Disbursements			0.00

**Attorney Billing Instructions**

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

**Billing Instructions**

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

**Account Summary – As Of 04/04/24**

	Fiscal YTD			Calendar YTD			LTD		
	Total	Fees	Disb.	Total	Fees	Disb.	Total	Fees	Disbursements
Worked	5,710.50	5,710.50	0.00	1,083.50	1,083.50	0.00	92,447.00	92,447.00	0.00
Unbilled Adj	0.00	0.00	0.00	0.00	0.00	0.00	44.50	44.50	0.00
Billed	13,384.00	13,384.00	0.00	2,398.00	2,398.00	0.00	91,319.00	91,319.00	0.00
Collected	13,384.00	13,384.00	0.00	2,398.00	2,398.00	0.00	91,319.00	91,319.00	0.00
AR Write Off	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00
<b>WIP</b>	<b>1,083.50</b>	<b>1,083.50</b>	<b>0.00</b>						
<b>Balance</b>									
<b>AR Balance</b>	<b>0.00</b>	<b>0.00</b>	<b>0.00</b>						
<b>Unalloc</b>	<b>0.00</b>								
<b>Payment</b>									
<b>Client Trust</b>	<b>0.00</b>								
<b>Balance</b>									

**Billing Address**

04/09/24 13:37:59 PROFORMA STATEMENT FOR MATTER 392775.00009 (Winkler, Geoff - Receiver for J&J Consul) (Third Party Claims & Recoveries)

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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# **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: 2/29/2024

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 \$12,250.20

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
02/26/2024	INV #7092-01_20. Orig. Amount \$179.00.	179.00	12,250.20

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

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 2/26/2024  
 Invoice Number 7092-01\_20  
 Client Number 7092  
 Matter Number 01

RE: Receiver in Nevada Actions

BILL THROUGH DATE 1/31/2024

Date	Employee	Description	Hours	Rate	Amount
1/8/2024	O Kelly	PROFESSIONAL FEES Review minute order re deadline to file objection to memorandum re fees/costs (22-cv-00612)	0.1	145.00	14.50
1/22/2024	O Kelly	Review minutes re status conference held 1/12/24 (0.1) (2:22-cv-00612)	0.1	145.00	14.50
1/31/2024	J Rickard	Review seventh quarterly status report of Receiver	0.4	375.00	150.00
Subtotal					179.00

**Total Current Invoice \$179.00**

**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: 3/28/2024

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 \$12,738.70

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.	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
02/26/2024	INV #7092-01_20. Orig. Amount \$179.00.	179.00	12,250.20
03/27/2024	INV #7092-01_21. Orig. Amount \$488.50.	488.50	12,738.70

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

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 3/27/2024  
 Invoice Number 7092-01\_21  
 Client Number 7092  
 Matter Number 01

RE: Receiver in Nevada Actions

BILL THROUGH DATE 2/29/2024

Date	Employee	Description	Hours	Rate	Amount
2/8/2024	J Rickard	PROFESSIONAL FEES Reviewing orders regarding change of 9th Circuit argument timing	0.3	375.00	112.50
2/22/2024	O Kelly	Review e-mails from M Pham re notice of termination of lis pendens (0.2) (2:22-cv-01352-CDS-EJY); e-mails with J Rickard re same (0.3) (2:22-cv-01352-CDS-EJY); review/revise notice of termination of lis pendens (0.2) (2:22-cv-01352-CDS-EJY)	0.7	145.00	101.50
2/22/2024	J Rickard	Review and sign notice of termination of lis pendens; emailing regarding same	0.2	375.00	75.00
2/28/2024	O Kelly	E-mails with J Rickard/M Pham re notice of termination of notice of lis pendens re 16 Paradise Valley (0.2)(2:22-cv-01352); send out executed notice of termination of notice of lis pendens re 16 Paradise Valley for hand delivery to Stewart Title Company (0.4)(2:22-cv-01352)	0.6	145.00	87.00
2/28/2024	J Rickard	Emailing regarding notice of termination of lis pendens	0.3	375.00	112.50
		Subtotal			488.50

**Total Current Invoice \$488.50**



**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: 4/9/2024

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 \$11,655.10

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.	160.40	9,527.10
12/12/2023	INV #7092-01_18. Orig. Amount \$771.50.	154.30	9,681.40
01/06/2024	INV #7092-01_19. Orig. Amount \$1,131.00.	226.20	9,907.60
02/26/2024	INV #7092-01_20. Orig. Amount \$179.00.	179.00	10,086.60
03/27/2024	INV #7092-01_21. Orig. Amount \$488.50.	488.50	10,575.10
04/08/2024	INV #7092-01_22. Orig. Amount \$1,080.00.	1,080.00	11,655.10

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

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 4/8/2024  
 Invoice Number 7092-01\_22  
 Client Number 7092  
 Matter Number 01

RE: Receiver in Nevada Actions

BILL THROUGH DATE 3/31/2024

Date	Employee	Description	Hours	Rate	Amount
3/5/2024	O Kelly	PROFESSIONAL FEES File joint status report in case 2:22-cv-00529 (0.3); file joint status report in case 2:23-cv-00703 (0.3)	0.6	145.00	87.00
3/5/2024	J Rickard	Review status report regarding Wells Fargo action; emailing regarding same	0.7	375.00	262.50
3/6/2024	J Rickard	Review additional production from Oberheiden firm and emailing regarding same	0.8	375.00	300.00
3/8/2024	O Kelly	Review invoice from Legal Wings re delivery of notice of termination of notice of lis pendens (0.1) (2:22-CV-01352)	0.1	145.00	14.50
3/14/2024	J Rickard	Review joint status report in Wells Fargo action	0.3	375.00	112.50
3/19/2024	O Kelly	Review orders re status report (0.6) (22-cv-529/23-cv-703);	0.6	145.00	87.00
3/22/2024	J Rickard	Emailing with lead counsel regarding status check hearing	0.2	375.00	75.00
3/26/2024	O Kelly	Review minute order re motions hearing outcome (0.1) (2:22-cv-00612)	0.1	145.00	14.50
3/28/2024	O Kelly	Review G Winkler's amended initial disclosures (0.1) (2:23-cv-00703); review minute order setting hearing on Motion for Leave to Take the Deposition of Defendant Matthew Wade Beasley (0.1) (2:22-cv-00612)	0.2	145.00	29.00
		Subtotal			982.00
3/8/2024		EXPENSES/COSTS Legal Wings Invoice R-2002539		98.00	98.00
		Subtotal			98.00

**Total Current Invoice \$1,080.00**