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21 KRISTA L. FREITAG

22 UNITED STATES DISTRICT COURT
23 SOUTHERN DISTRICT OF CALIFORNIA

24 SECURITIES AND EXCHANGE
25 COMMISSION,

26 Plaintiff,

27 v.

28 GINA CHAMPION-CAIN and ANI
DEVELOPMENT, LLC,

Defendants,

AMERICAN NATIONAL
INVESTMENTS, INC.,

Relief Defendant.

Case No. 3:19-cv-01628-LAB-AHG

**FOURTH INTERIM FEE
APPLICATION OF ALLEN
MATKINS LECK GAMBLE
MALLORY & NATSIS LLP,
GENERAL COUNSEL TO THE
RECEIVER, KRISTA L. FREITAG,
FOR PAYMENT OF FEES AND
REIMBURSEMENT OF EXPENSES**

Date: July 6, 2021
Time: 11:15 a.m.
Courtroom: 14A
Judge: Hon. Larry A. Burns

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1 Allen Matkins Leck Gamble Mallory & Natsis LLP ("Allen Matkins"),
 2 general counsel to Krista L. Freitag (the "Receiver"), the Court-appointed receiver
 3 for ANI Development, LLC, American National Investments, Inc. ("ANI"), and
 4 their respective subsidiaries and affiliates (the "Receivership Entities"), hereby
 5 submits this Fourth Interim Application for Payment of Fees and Reimbursement of
 6 Expenses (the "Application"). This Application covers the period from July 1, 2020
 7 through September 30, 2020 (the "Application Period"), and seeks approval of
 8 \$523,796.40 in fees and \$57,521.56 in expenses, and an order authorizing the
 9 Receiver to pay, on an interim basis, 80% of the fees incurred (\$419,037.12) and
 10 100% of the expenses incurred (\$57,521.56).

11 **I. INTRODUCTION.**

12 This equity receivership involves a large, complex, and wide-ranging group
 13 of enterprises and assets associated with the alleged \$300 million fraudulent scheme
 14 that is the subject of the Complaint filed by the Securities and Exchange
 15 Commission (the "Commission"). The Receiver was appointed on
 16 September 3, 2019, pursuant to the Order; Granting The Parties' Joint Motion And
 17 Stipulated Request By All Parties For A Preliminary Injunction Order And Order (1)
 18 Freezing Assets; (2) Requiring Accountings; (3) Prohibiting Destruction Of
 19 Documents; And (4) Appointing A Permanent Receiver (the "Appointment Order")
 20 (Dkt. 6).

21 The Appointment Order confers broad duties, responsibilities, and powers
 22 upon the Receiver, which are designed to allow her to secure, preserve, and protect
 23 the assets of the Receivership Entities, conduct a forensic accounting and analysis of
 24 the Receivership Entities' financial transactions, investigate and recover sums
 25 transferred to third parties, review and analyze investor and creditor claims, and
 26 maximize the amount ultimately available for distribution to investors and creditors.
 27 The Receiver determined that experienced and qualified counsel was critical to the
 28 performance of her duties and obligations under the Appointment Order due to the

size and complexity of the receivership estate. Accordingly, the Receiver engaged Allen Matkins to assist with legal issues facing the receivership estate and the firm promptly began work, including assisting with the takeover of the enterprises and securing their assets.

This Application should be read in conjunction with the Receiver's Fifth Interim Report and Recommendations ("Fifth Report") filed on December 23, 2020 (Dkt. 556), which describes in detail the Receiver's activities during the Application Period.

This Application seeks approval of \$523,796.40 in fees for a total of 926.50 hours worked, and payment on an interim basis of 80% of that amount, or \$419,037.12. Allen Matkins has agreed to discount its standard hourly rates by 10% for this case. The work performed is described task-by-task in **Exhibit A**¹ and is broken down into the following categories:

Category	Hours	Amount
General Receivership	5.40	\$2,983.50
Asset Investigation & Recovery	428.80	\$219,333.60
Reporting	4.10	\$2,509.20
Operations & Asset Sales	177.00	\$97,483.05
Claims & Distributions	45.90	\$31,809.15
Third Party Recoveries	259.10	\$165,883.50
Pending Litigation	3.20	\$1,958.40
Employment/Professional Fees	3.00	\$1,836.00
Total Fees	926.50	\$523,796.40

The three largest categories of work – Asset Investigation & Recovery, Operations & Asset Sales and Third Party Recoveries – reflects the Receiver's focus

¹ While Allen Matkins has made efforts to ensure that its billing entries are consistent across categories, certain activities lend themselves to more than one category, or may be difficult to categorize. In any event, **Exhibit A** reflects the actual time spent by Allen Matkins personnel, and contains accurate descriptions of the services rendered.

on investigating, recovering, analyzing, and selling receivership assets through Court-approved sales of real and personal property. The firm has also assisted the Receiver in investigating and analyzing claims to recover sums from third parties and in obtaining documents from and producing documents to Chicago Title, investors/lenders, and other interested parties in an efficient manner. Throughout this period, Allen Matkins worked with a myriad of third parties seeking receivership records. Through a cooperative dialogue and Court-approved document repository, Allen Matkins has helped the Receiver avoid costly and time-consuming discovery disputes.

Allen Matkins' work has allowed the Receiver to preserve and protect the substantial value of receivership estate assets. Because the firm has worked diligently and efficiently to assist the Receiver in carrying out her Court-ordered duties, it should be compensated on an interim basis for its work.

II. SUMMARY OF TASKS PERFORMED AND COSTS INCURRED.

A. Categories and Descriptions of Work.

1. General Receivership.

Allen Matkins' work in this category relates to tax issues, Defendant Champion-Cain's guilty plea in the related criminal case, a request by Defendant Champion-Cain to unfreeze funds in order to pay her counsel, and the Receiver's engagement of special conflicts counsel. The reasonable and necessary fees for Allen Matkins' work in this category total \$2,983.50.

2. Asset Investigation & Recovery.

The substantial services in this category relate generally to efforts to identify, secure, preserve, investigate and recover receivership assets. The overriding goals of this work have been to identify and marshal receivership assets and investigate the foundation for claims in order to recover assets and pursue claims against third parties; all in an effort to maximize the distributions to victims of the scheme. The tasks performed include the following:

- 1 • Issuing subpoenas to financial institutions, lenders, recipients of
- 2 potential receivership assets, and others involved with or otherwise
- 3 connected to the Receivership Entities or receivership assets in some
- 4 manner;
- 5 • Issuing demand and asset turnover letters to recipients believed to be in
- 6 possession of receivership assets in order to enable the Receiver to
- 7 recover and gain control over the assets;
- 8 • Gathering, organizing, and reviewing documents and information
- 9 obtained from third parties;
- 10 • Analyzing investor loans and associated documentation.

11 Allen Matkins also assisted the Receiver in establishing a centralized database
 12 or "repository" of ANI documents and information that the Receiver has provided
 13 (through a series of productions) to Chicago Title Company ("CTC"),
 14 investors/lenders, and other third parties in lieu of responding to multiple subpoenas
 15 and document requests in related litigation matters. The Receiver filed a joint
 16 motion to approve the proposed repository, allocation of costs, and protective order
 17 on June 9, 2020, which was approved by the Court on June 26, 2020. Dkt. 326, 355.

18 During the Application Period, Allen Matkins worked with the Receiver and
 19 the e-discovery vendor to organize, process, label, and produce a very large volume
 20 of electronic data. The source files at issue include hundreds of thousands of
 21 documents and electronic records stored at various locations, servers, hard drives
 22 and cloud storage, as well as documents produced to the Receiver by numerous third
 23 parties pursuant to subpoenas issued by the Receiver.

24 Although significant time was spent to establish the ANI document
 25 repository, as well as to meet and confer with the interested parties, this work
 26 already has (and will continue to) save the receivership estate significant costs of
 27 having to respond to numerous individual document requests involving hundreds of
 28

1 thousands of documents and electronic records in the various litigation matters
2 arising from the ANI Ponzi scheme.

3 Allen Matkins also assisted the Receiver in addressing the various issues
4 associated with the property owned by Defendant Gina Champion-Cain and her
5 husband Steven Cain located at 4014 Bandini Street, including secured debts on the
6 property and the receivership estate's claims to recover ANI funds used for the down
7 payment and to pay down prior loans on the property. These issues were ultimately
8 resolved via the Joint Motion filed on November 9, 2020, and order approving it
9 (Dkt. 499, 506.), pursuant to which the receivership estate has recovered
10 \$1.3 million.

11 Finally, Allen Matkins has assisted the Receiver in analyzing the receivership
12 estate's rights and interests under certain insurance policies, including preparing a
13 claim against ANI's crime/theft insurance policy based on the guilty pleas entered
14 by Defendant Gina Champion-Cain and former ANI employee Cris Torres in the
15 related criminal cases. The reasonable and necessary fees for Allen Matkins' work
16 in this category total \$219,333.60.

17 3. Reporting.

18 Allen Matkins' services in this category focused on preparing the Receiver's
19 Fourth Interim Report and Recommendations, which was filed on August 19, 2020.
20 Dkt. 430. The 22-page report includes a detailed summary of the Receiver's
21 activities, funds recovered, real and personal property assets, restaurant and retail
22 operations, property taxes, insurance, debt service, loans and other investments,
23 investigation of third party claims, pending litigation, and other matters. The report
24 also details the receipts and disbursements for the receivership estate since the
25 Receiver's appointment and provides her recommendations for the continued
26 administration of the receivership. The reasonable and necessary fees for Allen
27 Matkins' work in this category total \$2,509.20.

28

1 4. Operations & Asset Sales.

2 Allen Matkins' significant work in this category reflects the volume and
3 complexity of legal issues that arose during the Application Period in connection
4 with the preservation, operation and sale of assets and the various businesses owned
5 and operated by the Receivership Entities, including but not limited to restaurants,
6 cafes, apartments, construction projects, leased properties, and other receivership
7 properties. In summary, work within this category included the following:

- 8 • Drafting, negotiating, and revising confidentiality agreements, purchase
9 and sale agreements, commercial and residential leases and lease
10 amendments, and restaurant management agreements, where necessary
11 and appropriate, for various receivership businesses and properties, as
12 well as handling related title, loan, and contract issues;
- 13 • Analyzing and assisting with restaurant closures, terminations of leases
14 for retail and restaurant spaces, surrender of possession, liquor license
15 issues, UCC lien issues, and removal of personal property and other
16 fixtures upon the termination of such leases;
- 17 • Attending to issues in connection with the maintenance of existing
18 trademarks, and abandonment of certain other unused trademarks,
19 relating to the Receivership Entities' various businesses;
- 20 • Addressing issues of employment law for the Receivership Entities,
21 including employee terminations, unpaid PTO, WARN Act issues,
22 health insurance and COBRA issues, and independent contractor
23 agreements in connection with businesses operations and the wind
24 down thereof;
- 25 • Analyzing and advising on insurance coverage issues;
- 26 • Advising and assisting with responses to media inquiries regarding the
27 receivership, restaurant operations, restaurant closures, and related
28 matters;

- 1 • Assisting with closing documents for real property sales, and with
- 2 escrow agreements and related documents relating to sales of liquor
- 3 licenses associated with closed restaurants;
- 4 • Assisting with lease issues pertaining to certain tenants for residential
- 5 properties;
- 6 • Preparing motions, declarations, proposed orders, and notices regarding
- 7 non-receipt of overbids (as applicable) for Court approval of sales of
- 8 the following: the 809 San Rafael property, 7565-7571 University Ave.
- 9 property, Mission Beach Surf Rider assets, Bella Pacific property,
- 10 737 Windemere Court property, and Ocean Beach Surf Rider assets;
- 11 and
- 12 • Advising on issues related to COVID-19 pandemic and Safer-At-Home
- 13 Orders, including required modifications to business operations and
- 14 notices to remaining ANI employees.

15 The reasonable and necessary fees for Allen Matkins' work in this category
 16 total \$97,483.05.

17 5. Claims & Distributions.

18 Services rendered in this category generally relate to the claims and interests
 19 of investors and creditors of the Receivership Entities. Allen Matkins assisted with
 20 issues related to disseminating information about the receivership to investors and
 21 creditors, including information provided on the receivership website
 22 (www.anireceivership.com). The firm also assisted in responding to direct inquiries
 23 from investors and creditors.

24 Allen Matkins assisted the Receiver in addressing the claims and mechanic's
 25 liens asserted by the lender, the City of West Sacramento, the general contractor and
 26 various subcontractors, respectively, associated with the partially constructed
 27 apartment building located at 301 D Street in West Sacramento. The firm also
 28 assisted in analyzing and addressing issues with various liens and claims asserted by

1 vendors, contractors, government agencies and former employees, including tax
2 claims and wage claims.

3 Having had sufficient time to assess the market for certain real properties in
4 relation to amounts owed on mortgages encumbering them, the Receiver determined
5 that it would be unlikely the receivership estate would be able to recover any value
6 from such properties. Accordingly, Allen Matkins assisted in negotiating and
7 preparing a joint motions to allow the lender with a mortgage on the 10th and J Street
8 property relief from the litigation stay to proceed with a non-judicial foreclosure.

9 Finally, Allen Matkins assisted the Receiver in negotiating a settlement of the
10 Deeds of Trust in favor of Charles Riharb and associated claims of security interests
11 in the 737 Windemere Court and 750 Yarmouth Court properties, and in obtaining
12 Court approval of such settlement via a Joint Motion filed on September 30, 2020.
13 Dkt. 468. The reasonable and necessary fees for Allen Matkins' work in this
14 category total \$31,809.15.

15 6. Third Party Recoveries.

16 This portion of the Application pertains to work on potential claims against
17 third parties to recover amounts for the benefit of the receivership estate. Due to the
18 confidential nature of the legal work on these matters and the Receiver's litigation
19 strategy vis-à-vis third parties, the Receiver has filed a motion concurrently herewith
20 to file this portion of the Application under seal. The reasonable and necessary fees
21 for Allen Matkins' work in this category total \$165,883.50.

22 7. Pending Litigation.

23 Services performed in this category include the analysis and management of
24 pending pre-receivership actions in which one or more of the Receivership Entities
25 are parties. Specifically, work within this category was largely devoted to the action
26 pending in Florida state court known as *Westlink Dev. Co., LLC v. SunTrust Bank*,
27 Pensacola, FL Cir. Ct. Case No. 13-008139-CI, in which Westlink Development,
28 LLC (a Receivership Entity) and other co-plaintiffs have asserted claims against

1 SunTrust Bank for aiding and abetting a multi-million dollar Ponzi scheme allegedly
 2 orchestrated by John Condo (separate from the alleged Ponzi scheme in this action).

3 Allen Matkins also assisted with issues relating to the action pending in San
 4 Diego Superior Court known as *Luu v. The Patio Restaurant Grp., LLC, et al.*, San
 5 Diego Super. Ct. Case No. 37-2019-00015451-CU-OE-CTL, which is a putative
 6 class action filed by a former employee (which action is now stayed pursuant to the
 7 litigation stay in the Appointment Order). The reasonable and necessary fees for
 8 Allen Matkins' work in this category total \$1,958.40.

9 8. Employment/Professional Fees

10 Although fee applications are a necessary component of federal equity
 11 receiverships, neither the Receiver nor Allen Matkins charge for their time to
 12 prepare their own detailed fee applications. Allen Matkins assisted the Receiver in
 13 preparing her Second Interim Fee Application (Dkt. 414), preparing a notice
 14 concerning the association of special conflicts counsel for the Receiver (Dkt. 413),
 15 and in meeting and conferring with counsel for the Securities and Exchange
 16 Commission. The reasonable and necessary fees for Allen Matkins' work in this
 17 category total \$1,836.00.

18 A. **Summary of Expenses Requested for Reimbursement.**

19 Allen Matkins requests that the Court approve reimbursement of \$57,521.56
 20 in out-of-pocket costs. The itemization of such expenses is summarized below by
 21 billing category. The majority of the expenses incurred relate to the processing,
 22 labeling, and production of approximately five terabytes of documents that were
 23 produced in phases/batches as part of the ANI document repository. These e-
 24 discovery vendor costs were approved in connection with the establishment of the
 25 repository and the costs were shared amongst the receivership estate, CTC, and the
 26 investor groups.

27 The costs incurred by Allen Matkins during the Application Period are broken
 28 down by category as follows:

Category	Total
Messenger/FedEx Fees	\$651.95
Service of Process	\$2,680.10
Filing Fees	\$78.44
Duplication	\$75.60
Postage	\$86.54
PACER/Document Research	\$677.45
E-Discovery	\$53,271.48
Total	\$57,521.56

II. THE FEES AND COSTS ARE REASONABLE AND SHOULD BE ALLOWED.

"As a general rule, the expenses and fees of a receivership are a charge upon the property administered." *Gaskill v. Gordon*, 27 F.3d 248, 251 (7th Cir. 1994). These expenses include the fees and expenses of this Receiver and her professionals, including Allen Matkins. Decisions regarding the timing and amount of an award of fees and costs to the Receiver and her professionals are committed to the sound discretion of the Court. *See SEC v. Elliot*, 953 F.2d 1560, 1577 (11th Cir. 1992) (rev'd in part on other grounds, 998 F.2d 922 (11th Cir. 1993)).

In allowing fees, a court should consider "the time, labor and skill required, but not necessarily that actually expended, in the proper performance of the duties imposed by the court upon the receiver . . . , the fair value of such time, labor and skill measured by conservative business standards, the degree of activity, integrity and dispatch with which the work is conducted and the result obtained." *United States v. Code Prods. Corp.*, 362 F. 2d 669, 673 (3d Cir. 1966) (internal quotation marks omitted). In practical terms, receiver and professional compensation thus ultimately rests upon the result of an equitable, multi-factor balancing test involving the "economy of administration, the burden that the estate may be able to bear, the

1 amount of time required, although not necessarily expended, and the overall value of
 2 the services to the estate." *In re Imperial 400 Nat'l, Inc.*, 432 F.2d 232, 237 (3d Cir.
 3 1970). Regardless of how this balancing test is formulated, no single factor is
 4 determinative and "a reasonable fee is based [upon] all circumstances surrounding
 5 the receivership." *SEC v. W.L. Moody & Co., Bankers (Unincorporated)*, 374 F.
 6 Supp. 465, 480 (S.D. Tex. 1974).

7 As a preliminary matter, the Appointment Order confers on the Receiver
 8 substantial duties and powers, including to conduct such investigation and discovery
 9 as may be necessary to locate and account for all Receivership Assets, to take such
 10 action as is necessary and appropriate to assume control over and preserve
 11 Receivership Assets, and to employ attorneys and others to investigate and, where
 12 appropriate, institute, pursue, and prosecute all claims and causes of action of
 13 whatever kind and nature. *See* Appointment Order, Section X.

14 The Receiver promptly determined that experienced, qualified counsel was
 15 necessary due to the size and complexity of the receivership estate and the Court
 16 agreed, approving Allen Matkins' employment, initially on a provisional basis and
 17 then on a non-provisional basis. Dkt. 126, 309. The Court also previously approved
 18 the Receiver's proposal to file interim reports and fee applications on a quarterly
 19 basis. Dkt. 126.

20 Allen Matkins has submitted a detailed fee application which describes the
 21 nature of the services rendered. *See* **Exhibit A**. Allen Matkins has endeavored to
 22 staff matters as efficiently as possible while remaining cognizant of the complexity
 23 of issues presented. As noted above, the request for fees is based on Allen Matkins'
 24 customary billing rates charged for comparable services provided in other matters,
 25 less a 10% discount. Moreover, Allen Matkins wrote off and did not charge for
 26 11.80 hours of work (\$8,330.40 in fees).

27 The work performed by Allen Matkins was essential to carrying out the
 28 Receiver's Court-ordered duties. The Receiver and Allen Matkins have worked

*Securities and Exchange Commission v. Gina Champion-Cain
and ANI Development, LLC*
USDC, Southern District of California, Case No. 3:19-cv-01628-LAB-AHG

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1 diligently since the Receiver's appointment to preserve and protect the assets of the
 2 receivership estate, maximize the funds available for ultimate distribution to
 3 victims, and carry out the Receiver's other duties pursuant to the Appointment
 4 Order. Moreover, Allen Matkins seeks payment of only 80% of fees incurred on an
 5 interim basis in recognition of the fact that its work in assisting the Receiver is
 6 ongoing. Payment of the proposed 20% holdback will be sought at the conclusion
 7 of the receivership. Allen Matkins' fees are fair and reasonable and should be
 8 approved and paid on an interim basis.

9 **III. CONCLUSION.**

10 Allen Matkins therefore respectfully request that this Court enter an Order:

- 11 1. Approving Allen Matkins' fees of \$523,796.40;
- 12 2. Authorizing and directing the Receiver to pay 80% of approved fees, or
 13 \$419,037.12, from the assets of the Receivership Entities;
- 14 3. Approving Allen Matkins' costs in the amount of \$57,521.56, and
 15 authorizing and directing the Receiver to reimburse such costs in full; and
- 16 4. For such other and further relief as the Court deems appropriate.

17
 18 Dated: May 28, 2021

ALLEN MATKINS LECK GAMBLE
 MALLORY & NATSIS LLP

19
 20 By: s/Edward G. Fates

21 DAVID R. ZARO
 22 EDWARD G. FATES
 23 NORMAN M. ASPIS
 Attorneys for Receiver
 KRISTA FREITAG

EXHIBIT A

}

02/10/21 21:57:31 PROFORMA STATEMENT FOR MATTER 378827.00002 (Krista Freitag, as Receiver for ANI Deve) (SEC v. Champion-Cain - General Receivers)

Preliminary Billing Form

Billing Atty: 001665 - Fates, Edward
(Ted)

Matter #: 378827.00002

Client Name: Krista Freitag, as Receiver for ANI Deve

Date of Last Billing: 12/28/20

Matter Name: SEC v. Champion-Cain - General Receivers

Proforma Number: 1076697

Client/Matter Joint Group # 378827-1

Fees for Matter 378827.00002.(SEC v. Champion-Cain - General Receivers)

Trans Date	Index	Description of Service Rendered	Timekeeper	Hours	Fees	Sum	Circle	Action	
07/22/20	8153905	Review and respond to emails regarding Champion-Cain plea in criminal case; research and forward documents regarding criminal matter	Kaup, John	0.90	271.35	271.35	WO	HD	TR
07/22/20	8154151	Review/analyze criminal informations and: Champion-Cain and C. Torres guilty pleas, advise Receiver re: same	Fates, Edward (Ted)	2.30	1,407.60	1,678.95	WO	HD	TR
07/23/20	8154415	Advise Receiver on issues re: engagement of special conflicts counsel and filing of notice related to same	Fates, Edward (Ted)	0.30	183.60	1,862.55	WO	HD	TR
07/23/20	8155035	Research and obtain criminal filings against Champion-Cain and Torres; review and respond to emails; organize criminal filing documents.	Kaup, John	0.50	150.75	2,013.30	WO	HD	TR
07/23/20	8163467	Review and analysis of criminal pleadings and analysis re: potential effect on various receivership tasks.	Farrell, Michael	0.90	664.20	2,677.50	WO	HD	TR

02/10/21 21:57:31 PROFORMA STATEMENT FOR MATTER 378827.00002 (Krisa Freitag, as Receiver for ANI Deve) (SEC v. Champion-Cain - General Receivers)

EXHIBIT A

Fees for Matter 378827.00002.(SEC v. Champion-Cain - General Receivers)

Trans Date	Index	Description of Service Rendered	Timekeeper	Hours	Fees	Sum	Circle	Action	
09/01/20	8195473	Communications with counsel for Champion-Cain re: dispute with carrier relating to D&O insurance coverage for attorney fees/defense costs	Fates, Edward (Ted)	0.30	183.60	2,861.10	WO	HD	TR
09/09/20	8200297	Address issues re: receivership entity tax returns, communications with Receiver and S. Hoslett	Fates, Edward (Ted)	0.20	122.40	2,983.50	WO	HD	TR

Disbursements for Matter 378827.00002 (SEC v. Champion-Cain - General Receivers)

Trans Date	Index	Type	Quantity	Amt	Circle	Action	
07/01/20	2654305	BW – Duplication - Black & White Copies	71.00	7.10	WO	HD	TR
07/01/20	2655742	EDISC – CS Disco, Inc. - Monthly Hosting for July 2020	0.00	3,783.24	WO	HD	TR
07/01/20	2655986	EDISC – CS Disco, Inc. - Monthly Hosting for June 2020 (prorated 27 of 30 days)	0.00	2,580.33	WO	HD	TR
07/07/20	2655076	MSNGR – Federal Express - Ship To: Donna Hamilton, Sr Escrow, Of	0.00	12.95	WO	HD	TR
07/07/20	2656221	DCSRCH – First Legal Network LLC - USDC - San Diego, ORDER GRANTING REQ TO APPROVE SALE OF CROWN POINT PROPER	0.00	89.75	WO	HD	TR
07/07/20	2656911	FILING – Nationwide Legal, LLC - USDC/SOUTHERN DISTRICT OF CALIFORNIA, SERVE A COURTESY COPY FOR HON. LARRY ALAN BURNS	0.00	47.60	WO	HD	TR
07/07/20	2662633	DCSRCH – Document Search - - PACER - 04/20 -6/20 Usage	0.00	3.00	WO	HD	TR
07/07/20	2662634	DCSRCH – Document Search - - PACER - 04/20 -6/20 Usage	0.00	7.70	WO	HD	TR
07/07/20	2662635	DCSRCH – Document Search - - PACER - 04/20 -6/20 Usage	0.00	5.10	WO	HD	TR
07/07/20	2662636	DCSRCH – Document Search - - PACER - 04/20 -6/20 Usage	0.00	6.20	WO	HD	TR

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02/10/21 21:57:31 PROFORMA STATEMENT FOR MATTER 378827.00002 (Krisa Freitag, as Receiver for ANI Deve) (SEC v. Champion-Cain - General Receivers)

EXHIBIT A

Disbursements for Matter 378827.00002 (SEC v. Champion-Cain - General Receivers)

Trans Date	Index	Type	Quantity	Amt					
07/07/20	2662637	DCSRCH – Document Search - - PACER - 04/20 -6/20 Usage	0.00	0.50	WO	HD	TR	_____	
07/07/20	2662638	DCSRCH – Document Search - - PACER - 04/20 -6/20 Usage	0.00	20.80	WO	HD	TR	_____	
07/10/20	2658145	RSRCH – Lexis	0.00	59.40	WO	HD	TR	_____	
07/15/20	2658146	RSRCH – Lexis	0.00	39.60	WO	HD	TR	_____	
07/24/20	2656718	PST – -Box All Parcel Center,Shipped document production via FedEx	0.00	59.79	WO	HD	TR	_____	
07/27/20	2659972	POS – Service of Process - - Nationwide Legal LLC, City National Bank – Attn: Subpoena Department, SUBPOENA TO PRODUCE DOCUMENTS, INFORMATION, OR OBJECTS OR TO PERMIT INSPECTION OF PREMISES IN A CIVIL ACTION	0.00	127.25	WO	HD	TR	_____	
07/27/20	2659973	POS – Service of Process - - Nationwide Legal LLC, Weaver and Tidwell, L.L.P. c/o Sean Kenney, Weaver and Tidwell, L.L.P., SUBPOENA TO PRODUCE DOCUMENTS, INFORMATION, OR OBJECTS OR TO PERMIT INSPECTION OF PREMISES IN A CIVIL ACTION	0.00	167.50	WO	HD	TR	_____	
07/27/20	2659978	POS – Service of Process - - Nationwide Legal LLC, Ilan Awerbuch, c/o Amy E. Martinez, Esq., Geraci Law Firm, SUBPOENA TO PRODUCE DOCUMENTS, INFORMATION, OR OBJECTS OR TO PERMIT INSPECTION OF PREMISES IN A CIVIL ACTION	0.00	191.05	WO	HD	TR	_____	
07/27/20	2659979	POS – Service of Process - - Nationwide Legal LLC, Frontier Global Partners LLC, SUBPOENA TO PRODUCE DOCUMENTS, INFORMATION, OR OBJECTS OR TO PERMIT INSPECTION OF PREMISES IN A CIVIL ACTION	0.00	191.60	WO	HD	TR	_____	
07/27/20	2659980	POS – Service of Process - - Nationwide Legal LLC, Merit Financial, Inc., c/o Amy E. Martinez, Esq., Geraci Law Firm, SUBPOENA TO PRODUCE DOCUMENTS, INFORMATION, OR OBJECTS OR TO PERMIT INSPECTION OF PREMISES IN A CIVIL ACTION	0.00	57.05	WO	HD	TR	_____	
07/27/20	2659981	POS – Service of Process - - Nationwide Legal LLC, MUFG	0.00	185.00	WO	HD	TR	_____	

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EXHIBIT A

Disbursements for Matter 378827.00002 (SEC v. Champion-Cain - General Receivers)

Trans Date	Index	Type	Quantity	Amt					
07/27/20	2659982	Union Bank, N.A. c/o Ricardo Orozco, SUBPOENA TO PRODUCE DOCUMENTS, INFORMATION, OR OBJECTS OR TO PERMIT INSPECTION OF PREMISES IN A CIVIL ACTION POS – Service of Process - - Nationwide Legal LLC, Wells Fargo Bank, N.A., SUBPOENA TO PRODUCE DOCUMENTS, INFORMATION, OR OBJECTS OR TO PERMIT INSPECTION OF PREMISES IN A CIVIL ACTION	0.00	51.00	WO	HD	TR		
07/27/20	2659983	POS – Service of Process - - Nationwide Legal LLC, Western Alliance Bank, SUBPOENA TO PRODUCE DOCUMENTS, INFORMATION, OR OBJECTS OR TO PERMIT INSPECTION OF PREMISES IN A CIVIL ACTION	0.00	51.00	WO	HD	TR		
07/27/20	2661957	POS – Nationwide Legal, LLC - EisnerAmper LLP, SUBPOENA TO PRODUCE DOCUMENTS, INFORMATION, OR OBJECTS OR TO PERMIT INSPECTION OF PREMISES IN A CIVIL ACTION	0.00	185.00	WO	HD	TR		
07/27/20	2668647	POS – Service of Process- - Nationwide Legal LLC - CalPrivate Bank – c/o Gary Brucker, Jr, SUBPOENA TO PRODUCE DOCUMENTS, INFORMATION, OR OBJECTS OR TO PERMIT INSPECTION OF PREMISES IN A CIVIL ACTION	0.00	225.00	WO	HD	TR		
07/31/20	2658566	BW – Duplication - Black & White Copies	42.00	4.20	WO	HD	TR		
07/31/20	2658567	COLOR – Duplication - Color Copies	4.00	0.40	WO	HD	TR		
07/31/20	2659196	COURT – -San Diego Superior Court,Obtain copies of Notices of Ruling and Minute order from Court's Docket.	0.00	15.00	WO	HD	TR		
08/01/20	2661612	EDISC – CS Disco, Inc. - Monthly Hosting for August 2020	0.00	9,017.89	WO	HD	TR		
08/01/20	2662283	EDISC – CS Disco, Inc. - Monthly Hosting for July 2020 (prorated for 13 of 31 days)	0.00	1,098.47	WO	HD	TR		
08/03/20	2659197	COURT – -San Diego Superior Court,Obtain copy of Cross-Complaint from Court's docket.	0.00	8.34	WO	HD	TR		
08/04/20	2664600	RSRCH – Lexis	0.00	39.60	WO	HD	TR		
08/05/20	2661951	POS – Nationwide Legal, LLC - Frontier Global Partners LLC, SUBPOENA TO PRODUCE DOCUMENTS INFORMATION	0.00	191.05	WO	HD	TR		

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Disbursements for Matter 378827.00002 (SEC v. Champion-Cain - General Receivers)

Trans Date	Index	Type	Quantity	Amt	WO	HD	TR	
08/05/20	2661974	POS – Nationwide Legal, LLC - La Jolla Bridge LLC, Subpoena to Produce Documents	0.00	376.05	WO	HD	TR	_____
08/06/20	2661975	POS – Nationwide Legal, LLC - Wells Fargo Bank, N.A., SUBPOENA TO PRODUCE DOCUMENTS	0.00	165.00	WO	HD	TR	_____
08/12/20	2661086	MSNGR – Federal Express - Ship To: Ms Karen Hagen	0.00	12.98	WO	HD	TR	_____
08/13/20	2661087	MSNGR – Federal Express - Ship To: Ms Karen Hagen	0.00	12.98	WO	HD	TR	_____
08/13/20	2664601	RSRCH – Lexis	0.00	59.40	WO	HD	TR	_____
08/14/20	2661995	POS – Nationwide Legal, LLC - Parks & Solar, LLP, Subpoena to Produce Documents, Information, or Objects or to Permit Inspection of Premises in a Civil Action	0.00	105.00	WO	HD	TR	_____
08/14/20	2668632	POS – Service of Process- - Nationwide Legal LLC - Wells Fargo Bank, N.A., SUBPOENA TO PRODUCE DOCUMENTS, INFORMATION, OR OBJECTS OR TO PERMIT INSPECTION OF PREMISES IN A CIVIL ACTION	0.00	165.00	WO	HD	TR	_____
08/14/20	2668633	POS – Service of Process- - Nationwide Legal LLC - AAA Life Insurance Company, SUBPOENA TO PRODUCE DOCUMENTS, INFORMATION, OR OBJECTS OR TO PERMIT INSPECTION OF PREMISES IN A CIVIL ACTION	0.00	105.00	WO	HD	TR	_____
08/17/20	2661097	MSNGR – Federal Express - Ship To: Donna Hamilton, Sr Escrow Off	0.00	13.01	WO	HD	TR	_____
08/19/20	2660782	BW – Duplication - Black & White Copies	358.00	35.80	WO	HD	TR	_____
08/29/20	2665766	MSNGR – Federal Express - Ship To: Andrew B Holmes, Esq	0.00	13.01	WO	HD	TR	_____
08/31/20	2665769	MSNGR – Federal Express - Ship To: Andrew B Holmes, Esq	0.00	12.98	WO	HD	TR	_____
09/01/20	2665244	BW – Duplication - Black & White Copies	55.00	5.50	WO	HD	TR	_____
09/01/20	2665245	COLOR – Duplication - Color Copies	2.00	0.20	WO	HD	TR	_____

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Disbursements for Matter 378827.00002 (SEC v. Champion-Cain - General Receivers)

Trans Date	Index	Type	Quantity	Amt				
09/01/20	2665756	MSNGR – Federal Express - Ship To: MARNI SIDER	0.00	17.80	WO	HD	TR	_____
09/01/20	2665811	COURT – -San Diego Superior Court,Obtain copy of 8/23/2020 Minute Order from Court docket.	0.00	7.50	WO	HD	TR	_____
09/01/20	2666672	EDISC – CS Disco, Inc. - Monthly Hosting for September 2020	0.00	8,049.55	WO	HD	TR	_____
09/01/20	2666687	EDISC – CS Disco, Inc. - Monthly Hosting for August 2020 (prorated 18 of 31 days)	0.00	9,782.12	WO	HD	TR	_____
09/01/20	2667266	EDISC – CS Disco Inc. - Monthly Hosting for September 2020	0.00	18,959.88	WO	HD	TR	_____
09/02/20	2665321	BW – Duplication - Black & White Copies	36.00	3.60	WO	HD	TR	_____
09/02/20	2665322	COLOR – Duplication - Color Copies	6.00	0.60	WO	HD	TR	_____
09/02/20	2668707	ADV – -Box All Parcel Center,Overnight shipping of hard drive containing document production.	0.00	146.89	WO	HD	TR	_____
09/02/20	2669143	RSRCH – Lexis	0.00	138.60	WO	HD	TR	_____
09/03/20	2665401	BW – Duplication - Black & White Copies	122.00	12.20	WO	HD	TR	_____
09/03/20	2666846	MSNGR – First Legal Network, LLC - Court Reporter; Delivery of check	0.00	74.99	WO	HD	TR	_____
09/03/20	2666848	DCSRCH – First Legal Network, LLC - PREFERRED CHOICE ESCROW; Order re Approval of Sale of 809 San Rafael Place Proper	0.00	97.30	WO	HD	TR	_____
09/03/20	2668706	ADV – -Box All Parcel Center,Overnight shipping of hard drive containing document production.	0.00	101.40	WO	HD	TR	_____
09/03/20	2669144	RSRCH – Lexis	0.00	39.60	WO	HD	TR	_____
09/04/20	2667115	PST – -Jason Nittel 002284,USPS PO 0538580529-Postage sent to Ross Neglia containing user created data . The receipt was uploaded to CR on 9/4.	0.00	26.75	WO	HD	TR	_____
09/11/20	2665994	BW – Duplication - Black & White Copies	29.00	2.90	WO	HD	TR	_____

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Disbursements for Matter 378827.00002 (SEC v. Champion-Cain - General Receivers)

Trans Date	Index	Type	Quantity	Amt				
09/11/20	2665995	COLOR – Duplication - Color Copies	2.00	0.20	WO	HD	TR	_____
09/16/20	2670688	POS – Service of Process - - Nationwide Legal LLC - JPMorgan Chase Bank, N.A. c/o CT Corporation System, Subpoena to Produce Documents, Information, or Objects or to Permit Inspection of Premises in a Civil Action	0.00	141.55	WO	HD	TR	_____
09/17/20	2666713	BW – Duplication - Black & White Copies	26.00	2.60	WO	HD	TR	_____
09/17/20	2666714	COLOR – Duplication - Color Copies	3.00	0.30	WO	HD	TR	_____
09/17/20	2667778	MSNGR – Federal Express - Ship To: HISCOX CLAIMS	0.00	22.73	WO	HD	TR	_____
09/22/20	2668708	ADV – -Box All Parcel Center,Hard drive shipment containing document production	0.00	152.44	WO	HD	TR	_____
09/23/20	2668709	ADV – -Box All Parcel Center,Shipped hard drive containing document production	0.00	44.84	WO	HD	TR	_____
09/28/20	2670100	MSNGR – Federal Express - Ship To: John H Stephens	0.00	12.95	WO	HD	TR	_____
09/30/20	2684762	DCSRCH – Document Search - - PACER - 07/20 -9/20 Usage	0.00	7.40	WO	HD	TR	_____
09/30/20	2684763	DCSRCH – Document Search - - PACER - 07/20 -9/20 Usage	0.00	8.80	WO	HD	TR	_____
09/30/20	2684764	DCSRCH – Document Search - - PACER - 07/20 -9/20 Usage	0.00	1.20	WO	HD	TR	_____
09/30/20	2684765	DCSRCH – Document Search - - PACER - 07/20 -9/20 Usage	0.00	16.80	WO	HD	TR	_____
09/30/20	2684766	DCSRCH – Document Search - - PACER - 07/20 -9/20 Usage	0.00	0.20	WO	HD	TR	_____
09/30/20	2684767	DCSRCH – Document Search - - PACER - 07/20 -9/20 Usage	0.00	6.40	WO	HD	TR	_____
09/30/20	2684768	DCSRCH – Document Search - - PACER - 07/20 -9/20 Usage	0.00	0.80	WO	HD	TR	_____
09/30/20	2684769	DCSRCH – Document Search - - PACER - 07/20 -9/20 Usage	0.00	5.40	WO	HD	TR	_____

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Disbursements for Matter 378827.00002 (SEC v. Champion-Cain - General Receivers)

Trans Date	Index	Type	Quantity	Amt				
09/30/20	2684770	DCSRCH – Document Search - - PACER - 07/20 -9/20 Usage	0.00	20.50	WO	HD	TR	_____
09/30/20	2684771	DCSRCH – Document Search - - PACER - 07/20 -9/20 Usage	0.00	3.40	WO	HD	TR	_____

Proforma Summary
Timekeeper

Number	Timekeeper	Hours	Rate	Amounts
000739	Farrell, Michael	0.90	738.00	664.20
000820	Kaup, John	1.40	301.50	422.10
001665	Fates, Edward (Ted)	3.10	612.00	1,897.20
		5.40		\$2,983.50
Subtotal Fees				\$2,983.50
Discount				0.00
Total Fees				2,983.50
Total Disbursements				57,521.56

Attorney Billing Instructions

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

Billing Instructions

expires 6/30/2021: 10% off standard rates (automatic); no text editing; copies @ .10

Account Summary – As Of 02/10/21

	Fiscal YTD			Calendar YTD			LTD		
	Total	Fees	Disb.	Total	Fees	Disb.	Total	Fees	Disbursements
Worked	8,848.50	8,369.10	479.40	3,121.20	3,121.20	0.00	60,505.06	2,983.50	57,521.56
Unbilled Adj	0.00	0.00	0.00	0.00	0.00	0.00	232.19	0.45	231.74
Billed	15,726.23	6,293.70	9,432.53	0.00	0.00	0.00	53,015.40	53,015.40	19,842.04
Collected	15,726.23	6,293.70	9,432.53	0.00	0.00	0.00	72,857.44	53,015.40	19,842.04

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EXHIBIT A

AR Write Off	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00
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	Total	Fees	Costs
WIP	115,082.47	8,369.10	106,713.37
Balance			
AR Balance	0.00	0.00	0.00
Unalloc	0.00		
Payment			
Client Trust	0.00		
Balance			

Billing Address

Krista Freitag, as Receiver for ANI Development, LLC, et al.
 E3 Advisors
 401 West 'A' Street, Suite 1830
 San Diego, CA 92101

EXHIBIT A

}

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Preliminary Billing Form

Billing Atty: 001665 - Fates, Edward
(Ted)

Matter #: 378827.00003

Client Name: Krista Freitag, as Receiver for ANI Deve

Date of Last Billing: 12/28/20

Matter Name: SEC v. Champion-Cain - Asset Investigati

Proforma Number: 1076697

Client/Matter Joint Group # 378827-1

Fees for Matter 378827.00003.(SEC v. Champion-Cain - Asset Investigati)

Trans Date	Index	Description of Service Rendered	Timekeeper	Hours	Fees	Sum	Circle Action			
07/01/20	8137623	Communications with counsel for S. Cain re: issues relating to Bandini property (.1) address issues re: timing and costs for ANI document repository (.6) discuss same with Receiver (.2) communications with counsel for K. Peterson re: document production (.3)	Fates, Edward (Ted)	1.20	734.40	734.40	WO	HD	TR	_____
07/01/20	8141877	Confer with counsel regarding timing of Peterson party production (.2).	Aspis, Norman	0.20	89.10	823.50	WO	HD	TR	_____
07/02/20	8139132	Analyze and advise on issues re: scanning/coding of hard copy ANI documents and associated costs (.3) communications with counsel for CTC re: same (.3) communications with counsel for K. Peterson re: same (.3)	Fates, Edward (Ted)	0.90	550.80	1,374.30	WO	HD	TR	_____
07/02/20	8141436	Review of email concerning outstanding subpoenas and the response/timing of production of electronic discovery to parties (.3). Research/analysis of the prospective claims against Kim Peterson (.9). Address	Zaro, David	1.80	1,449.90	2,824.20	WO	HD	TR	_____

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Fees for Matter 378827.00003.(SEC v. Champion-Cain - Asset Investigati)

Trans Date	Index	Description of Service Rendered and work on the review of records concerning the Peterson matters (.6).	Timekeeper	Hours	Fees	Sum	Circle Action			
07/02/20	8146033	Follow up on outstanding subpoena issues to Form-Craft, Chicago Title, and R. Houts (.3); confer with S. Peng regarding downloading and circulating recent production of records from Union Bank and circulate the same (.3).	Aspis, Norman	0.60	267.30	3,091.50	WO	HD	TR	_____
07/02/20	8148646	Analysis and determination of document productions in preparation for attorney review.	Peng, Simona	0.20	60.30	3,151.80	WO	HD	TR	_____
07/02/20	8157490	Analysis and review of various e-mails re: hard copy production issues, timing, and cost.	Farrell, Michael	0.40	295.20	3,447.00	WO	HD	TR	_____
07/06/20	8140204	Discuss issues re: repository costs with Receiver	Fates, Edward (Ted)	0.30	183.60	3,630.60	WO	HD	TR	_____
07/06/20	8157529	Analysis and review of various e-mails re: repository issues, resolution of cost dispute, and strategy for communication re: same (.3); revised draft of memorandum and exchanged e-mails re: same (.6).	Farrell, Michael	0.90	664.20	4,294.80	WO	HD	TR	_____
07/07/20	8141494	Address issues re: CTC document production and records needed for accounting, discuss same with Receiver (.9) address communications from counsel for CTC and counsel for Edelman Investors re: document repository (.6)	Fates, Edward (Ted)	1.50	918.00	5,212.80	WO	HD	TR	_____
07/07/20	8148319	Confer with counsel and S. Metzger regarding R. Houts' production (.2); and	Aspis, Norman	0.70	311.85	5,524.65	WO	HD	TR	_____

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Fees for Matter 378827.00003.(SEC v. Champion-Cain - Asset Investigati)

Trans Date	Index	Description of Service Rendered	Timekeeper	Hours	Fees	Sum	Circle	Action	
		confer with counsel and C. Waidelich regarding Chicago Title production (.5).							
07/07/20	8164936	Revised and finalized memorandum to all counsel re: repository and distributed same (.3); telephone conference and analysis re: CTC document production shortcomings and strategy re: same (.4); review and analysis of objection from G. Aguirre and exchanged e-mails re: response to same (.3); drafted response to objection (.2); review, analysis and exchange of e-mails with M. Donohue re: repository issues and exchanged e-mails re: same (.4).	Farrell, Michael	1.60	1,180.80	6,705.45	WO	HD	TR
07/08/20	8142417	Analyze CTC document production issues and strategy/approach to same (.5) discuss same and effect on accounting with Receiver and S. Hoslett (.7) calls/emails with counsel for S. Cain re: issues relating to Bandini property and First Choice loan (.8) discuss same with Receiver (.4)	Fates, Edward (Ted)	2.40	1,468.80	8,174.25	WO	HD	TR
07/08/20	8144439	Discovery dispute regarding documents, electronic records, reporting and production obligations, motion to compel (.4).	Zaro, David	0.40	322.20	8,496.45	WO	HD	TR
07/08/20	8148649	Analysis and determination of document productions preparation for attorney review.	Peng, Simona	0.30	90.45	8,586.90	WO	HD	TR
07/08/20	8164993	Review and analysis of prior correspondence re: repository issues and potential disputes (.4); analysis re: logistics of productions (.2).	Farrell, Michael	0.60	442.80	9,029.70	WO	HD	TR

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Fees for Matter 378827.00003.(SEC v. Champion-Cain - Asset Investigati)

Trans Date	Index	Description of Service Rendered	Timekeeper	Hours	Fees	Sum	Circle	Action	
07/08/20	8166535	Confer with S. Peng regarding Chicago Title production (.3).	Aspis, Norman	0.30	133.65	9,163.35	WO	HD	TR
07/09/20	8143201	Advise on meet and confer approach to subpoena document production issues with CTC (.4) revise meet and confer communication (.3) calls/emails with SEC counsel and counsel for First Choice Bank re: issues relating to Bandini property and mortgage (1.1) discuss same with Receiver (.3) communications with counsel for S. Cain and counsel for Champion-Cain (.3) address issues re: CTC payment, communications with counsel for K. Peterson, and production of first set of repository documents (.9)	Fates, Edward (Ted)	3.30	2,019.60	11,182.95	WO	HD	TR
07/09/20	8143803	Draft and revise email to counsel for Chicago Title regarding escrow ledger listings and confer with counsel regarding the same , and review Judge Goodard's procedures regarding discovery disputes (.9); confer with S. Peng and L. Ryan regarding Chicago Title production (.2).	Aspis, Norman	1.10	490.05	11,673.00	WO	HD	TR
07/09/20	8144533	Research/analysis of the builders risk policy and the prospective risks and claims against receivership estate and losses.	Zaro, David	0.50	402.75	12,075.75	WO	HD	TR
07/09/20	8148650	Analysis and determination of document productions in preparation for attorney review.	Peng, Simona	4.00	1,206.00	13,281.75	WO	HD	TR
07/09/20	8148671	Identify relevant production transmittal letters for attorney and expert review	Neglia, Ross	1.20	361.80	13,643.55	WO	HD	TR

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Fees for Matter 378827.00003.(SEC v. Champion-Cain - Asset Investigati)

Trans Date	Index	Description of Service Rendered	Timekeeper	Hours	Fees	Sum	Circle	Action	
07/10/20	8143875	Advise on issues re: K. Peterson/Kim Funding document production (.2) address issues re: first phase of ANI repository production (.3) call with SEC counsel, counsel for First Choice, counsel for S. Cain, and counsel for Champion-Cain re: issues relating Bandini property and First Choice loan (.8) calls with Receiver and SEC counsel re: same (.8) advise Receiver on issues re: tenant at Valle Vista property and approach to same (.6)	Fates, Edward (Ted)	2.70	1,652.40	15,295.95	WO	HD	TR
07/10/20	8148652	Analysis and determination of responsive documents in preparation for attorney review.	Peng, Simona	0.50	150.75	15,446.70	WO	HD	TR
07/10/20	8165305	Review and analysis of e-mails re: Peterson documents (.2); analysis, review of court order and exchange of e-mails re: ruling on intervention motions and effect of same on receivership (.5); review, analysis and exchange of various e-mails re: compilation of materials for repository production and privilege review (.5).	Farrell, Michael	1.20	885.60	16,332.30	WO	HD	TR
07/13/20	8145099	Address issues re: ANI repository production, protective order, document labeling/bates stamping (.2) meet and confer call with counsel for Chicago Title re: document production issues (.3)	Fates, Edward (Ted)	0.50	306.00	16,638.30	WO	HD	TR
07/13/20	8163852	Review, analysis and exchange of e-mails re: protective order, processing and bates stamping issues and timing.	Farrell, Michael	0.40	295.20	16,933.50	WO	HD	TR

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Fees for Matter 378827.00003.(SEC v. Champion-Cain - Asset Investigati)

Trans Date	Index	Description of Service Rendered	Timekeeper	Hours	Fees	Sum	Circle	Action	
07/13/20	8166451	Confer with counsel regarding Chicago Title supplemental production (.4).	Aspis, Norman	0.40	178.20	17,111.70	WO	HD	TR
07/14/20	8146313	Analyze issues re: review of R. Houts document production (.2) call with SEC counsel, counsel for S. Cain, and counsel for Champion-Cain re: issues with Bandini property and potential settlement (.5) discuss same and potential motion for authority to sell Bandini property with SEC counsel (.3) analyze legal issues and strategy for potential motion (.4) advise on ANI repository issues (.3)	Fates, Edward (Ted)	1.70	1,040.40	18,152.10	WO	HD	TR
07/14/20	8148644	Analysis and determination of document productions in preparation for attorney review.	Peng, Simona	0.50	150.75	18,302.85	WO	HD	TR
07/14/20	8163816	Review, analysis and exchange of e-mails re: progress on production of records from repository.	Farrell, Michael	0.30	221.40	18,524.25	WO	HD	TR
07/14/20	8166300	Confer with counsel, K. Freitag, and S. Hoslett regarding supplemental production from Chicago Title (.3); teleconference with counsel regarding Bandini property and review records regarding the same (.8).	Aspis, Norman	1.10	490.05	19,014.30	WO	HD	TR
07/15/20	8148129	Confer with C. Waidelich and Receiver regarding missing escrow ledger listings (.2); confer regarding document production to be uploaded to repository (.6).	Aspis, Norman	0.80	356.40	19,370.70	WO	HD	TR
07/15/20	8148654	Analysis and determination of document productions in preparation for attorney review.	Peng, Simona	1.00	301.50	19,672.20	WO	HD	TR

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07/15/20	8148672	Review and compile documents produced to receiver and prepare to provide same to parties	Neglia, Ross	2.30	693.45	20,365.65	WO	HD	TR	_____
07/15/20	8148766	Call with counsel concerning production of records/database issues and advice concerning discovery (.4).	Zaro, David	0.40	322.20	20,687.85	WO	HD	TR	_____
07/15/20	8163806	Telephone conferences, analysis and exchange of numerous e-mails re: repository production issues and timing (1.4); reviewed prior correspondence and filings (.4); conference and analysis re: subpoenaed documents and other production issues (.5).	Farrell, Michael	2.30	1,697.40	22,385.25	WO	HD	TR	_____
07/16/20	8148149	Address issues concerning scope and process for first phase of ANI document repository production	Fates, Edward (Ted)	0.30	183.60	22,568.85	WO	HD	TR	_____
07/16/20	8148451	Analysis and determination of document productions in preparation for attorney review.	Peng, Simona	2.00	603.00	23,171.85	WO	HD	TR	_____
07/16/20	8148749	prepare documents received via subpoena for review and production to parties	Neglia, Ross	4.70	1,417.05	24,588.90	WO	HD	TR	_____
07/16/20	8149116	Review R. Houts' production of records and draft email summary regarding the same (2.9); coordinate with Ross and S. Peng regarding document repository (.8); confer with S. Peng regarding Chicago Title production (.1).	Aspis, Norman	3.80	1,692.90	26,281.80	WO	HD	TR	_____

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07/16/20	8163746	Various telephone conferences, analysis and exchange of e-mails re: repository issues, including production timing and cost issues.	Farrell, Michael	1.60	1,180.80	27,462.60	WO	HD	TR
07/17/20	8149258	Analyze summary of R. Houts document production and advise on next steps (.8) analyze potential claims against insiders/third parties and investigation of same (.8) call with SEC counsel and AUSA re: issues relating to Bandini property and criminal investigation/forfeiture (.4) advise Receiver re: same (.2) advise on issues re: repository production (.2)	Fates, Edward (Ted)	2.40	1,468.80	28,931.40	WO	HD	TR
07/17/20	8150463	prepare documents received via subpoena for review and production to parties	Neglia, Ross	1.80	542.70	29,474.10	WO	HD	TR
07/17/20	8151077	Confer with counsel regarding R. Houts' production and document repository issues (.8); confer with S. Peng regarding document repository issues and upload certain records regarding the same (.6).	Aspis, Norman	1.40	623.70	30,097.80	WO	HD	TR
07/17/20	8151507	Analysis and determination of responsive documents in preparation for attorney review.	Peng, Simona	2.00	603.00	30,700.80	WO	HD	TR
07/17/20	8163709	Telephone conferences, analysis and review of materials re: production/redaction issues and strategy.	Farrell, Michael	0.50	369.00	31,069.80	WO	HD	TR
07/19/20	8151501	Analysis and determination of responsive documents in preparation for attorney review.	Peng, Simona	3.00	904.50	31,974.30	WO	HD	TR

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07/20/20	8150696	Advise on R. Houts document production issues (.3) discuss same with Receiver (.2) analyze issues/strategy for motion concerning Bandini property (.7) call with SEC counsel, counsel for S. Cain, and counsel for A. Machala re: Bandini issues (.2) call with SEC counsel re: same (.2) discuss issues re: Bandini property and ANI account at CalPrivate Bank with Receiver (.4) discuss investigation re: I. Auerbach/Merit Financial with Receiver (.3)	Fates, Edward (Ted)	2.30	1,407.60	33,381.90	WO	HD	TR
07/20/20	8151500	Analysis and determination of responsive documents in preparation for attorney review.	Peng, Simona	4.50	1,356.75	34,738.65	WO	HD	TR
07/20/20	8152085	Analyze case law regarding pursuing assets outside the scope of the receivership estate, including via tracing of funds (1.8); draft email regarding the same (.6); confer with counsel and S. Metzger regarding R. Houts' production (.2); confer with S. Peng and M. Farrell regarding document repository (.3); transmit Chicago Title's production to K. Freitag (.1).	Aspis, Norman	3.00	1,336.50	36,075.15	WO	HD	TR
07/20/20	8163645	Review, analysis and exchange of e-mails with CTC counsel re: repository production issues and timing (.3); review, analysis and exchange of e-mails re: production issues and requirements (.3).	Farrell, Michael	0.60	442.80	36,517.95	WO	HD	TR
07/21/20	8152054	Discuss motion re: Bandini property and tracing issues with Receiver (.6) initial work on motion (.5)	Fates, Edward (Ted)	1.10	673.20	37,191.15	WO	HD	TR

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07/21/20	8152495	Analysis and determination of responsive documents in preparation for attorney review.	Peng, Simona	3.90	1,175.85	38,367.00	WO	HD	TR
07/21/20	8153208	Confer with counsel regarding Bandini property strategy (.5).	Aspis, Norman	0.50	222.75	38,589.75	WO	HD	TR
07/22/20	8152894	Advise on approach/next steps to R. Houts document production issues (.3) discuss issues re: ANI License Fund account with Receiver (.4) Call/emails with counsel for CalPrivate Bank and counsel for K. Peterson re: same (.7) analyze information re: HAV Global Macro and discuss strategy re: same with Receiver (.4) initial work on document subpoenas (.3) discuss repository production and Setec data collection issues with Receiver and G. Rodriguez (1.1)	Fates, Edward (Ted)	3.20	1,958.40	40,548.15	WO	HD	TR
07/22/20	8155154	Analysis and determination of responsive documents in preparation for attorney review.	Peng, Simona	6.60	1,989.90	42,538.05	WO	HD	TR
07/22/20	8165795	Attention to review of production of records from Houts and confer with counsel regarding the same (.4).	Aspis, Norman	0.40	178.20	42,716.25	WO	HD	TR
07/22/20	8165818	Confer with counsel and S. Peng regarding repository production to Chicago Title (.4).	Aspis, Norman	0.40	178.20	42,894.45	WO	HD	TR
07/23/20	8154237	Advise Receiver on issues re: data for ANI document repository and vendor issues (1.6) advise on additional document subpoenas to be issued (.3) analyze and discuss issues relating to ANI License Fund	Fates, Edward (Ted)	3.60	2,203.20	45,097.65	WO	HD	TR

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		account with Receiver and S. Hoslett (1.2) communications with counsel for CalPrivate Bank re: same (.2) address issues re: investor payments for repository costs, discuss same with Receiver (.3)							
07/23/20	8155041	Confer with counsel regarding subpoena issues (.4); confer with S. Metzger regarding Houts' production (.1); confer with S. Peng regarding Houts' production (.1).	Aspis, Norman	0.60	267.30	45,364.95	WO	HD	TR
07/23/20	8155156	Analysis and determination of responsive documents in preparation for attorney review.	Peng, Simona	5.50	1,658.25	47,023.20	WO	HD	TR
07/23/20	8158730	Analysis of the plea agreement, assess the impact upon receivership investigation and proceedings (1.2). Call with counsel related to the records issues (.2). Conference with counsel and Receiver regarding plea agreement, address prospective discovery/interviews (.4). Email/call related to documents/discovery and preservation of electronic files, follow-up with Receiver/counsel and investigate alternatives (.4).	Zaro, David	2.20	1,772.10	48,795.30	WO	HD	TR
07/23/20	8158736	Email/call related to ANI License Fund bank account and recovery of funds, legal analysis of competing interests.	Zaro, David	0.30	241.65	49,036.95	WO	HD	TR
07/23/20	8163468	Review, analysis and exchange of various e-mails with client and counsel re: strategy to address investor partial payments (.4); drafted correspondence to all counsel re: same (.2); conference call, analysis and	Farrell, Michael	2.50	1,845.00	50,881.95	WO	HD	TR

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		exchange of various e-mails re: repository issues and strategy to address same (1.9).								
07/24/20	8155157	Analysis and determination of responsive documents in preparation for attorney review.	Peng, Simona	2.00	603.00	51,484.95	WO	HD	TR	_____
07/24/20	8155187	Advise Receiver re: forensic computer and e-discovery vendor issues (.3) revise third-party document subpoenas to be issued (.4)	Fates, Edward (Ted)	0.70	428.40	51,913.35	WO	HD	TR	_____
07/24/20	8156492	Draft and finalize several subpoenas and confer with counsel regarding the same (1.1); confer with counsel and S. Peng regarding document repository and address issues regarding the same (.6); confer with S. Hoslett regarding various subpoenas, including subpoena to Cal Private Bank (.3).	Aspis, Norman	2.00	891.00	52,804.35	WO	HD	TR	_____
07/26/20	8163275	Review, analysis and exchange of e-mails re: investor group actions and data processing issues.	Farrell, Michael	0.40	295.20	53,099.55	WO	HD	TR	_____
07/27/20	8156878	Discuss forensic accounting approach to investor claims and clawback claims against net winners with Receiver and S. Hoslett (.9) analyze and advise Receiver on issues re: ANI document repository timing and costs (.9) advise as to issues re: subpoenas for Peterson/Kim Funding account records (.3)	Fates, Edward (Ted)	2.10	1,285.20	54,384.75	WO	HD	TR	_____
07/27/20	8158126	Prepare for and participate in teleconference with K. Freitag, S. Hoslett, and T. Fates regarding accounting, and confer with counsel regarding the same	Aspis, Norman	3.70	1,648.35	56,033.10	WO	HD	TR	_____

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		(1.1); review and finalize subpoenas for service , and correspond with counsel regarding the same (.8); draft argument section of motion regarding Bandini Property (1.6); confer with S. Metzger regarding Mr. Houts' production (.2).							
07/27/20	8160904	Evaluate, research and work on issues arising out of Champion-Cain/Torres please, including review of pleas/research impact on third party claimants and Receiver's claims (1.6). Advice to counsel related to the discovery/Receiver subpoenas (.3).	Zaro, David	1.90	1,530.45	57,563.55	WO	HD	TR
07/27/20	8163288	Telephone conference, analysis and exchange of numerous e-mails re: data and document issues, production costs, timing, and strategy going forward (1.5); review, analysis and exchange of e-mails with CTC counsel re: sharing of information with former employees and scheduling of conference call (.4).	Farrell, Michael	1.90	1,402.20	58,965.75	WO	HD	TR
07/28/20	8159564	Review materials from IRS and prepare letter regarding the same, including analyzing case law in support of letter (1); review correspondence regarding document repository and review materials to respond (.3); confer with counsel regarding Bandini property (.3).	Aspis, Norman	1.60	712.80	59,678.55	WO	HD	TR
07/28/20	8159888	Advise Receiver re: issues with forensic computer vendor and costs (.3) review and discuss info re: former employee payments with Receiver (.3) analyze issues for draft	Fates, Edward (Ted)	3.90	2,386.80	62,065.35	WO	HD	TR

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		motion re: Bandini property (.6) work on draft motion (1.4) call with counsel for CTC re: ANI repository production timing and costs (.4) advise Receiver re: same (.1) discuss subpoenas, document review and investigation of potential claims against third parties with Receiver (.4) discuss subpoena received by ANI employee with Receiver (.2) call with counsel for ANI employee re: same (.2)							
07/28/20	8160944	Research/analysis of the insurance policies as to forgery, theft, criminal behavior (1.3). Work on further analysis of the insurance claim, follow-up with email to Receiver as to policy claims analysis (.4).	Zaro, David	1.70	1,369.35	63,434.70	WO	HD	TR
07/28/20	8162957	Telephone conference and analysis re: preparation for call (.3); participation in conference call with CTC counsel re: repository production issues (.4); analysis re: results of call and timing/strategy going forward (.3); reviewed prior correspondence re: production parameters (.2).	Farrell, Michael	1.10	811.80	64,246.50	WO	HD	TR
07/29/20	8159417	Advise on issues re: pending document subpoenas and review of key documents produced (.4) analyze potential insurance recovery claims (.3)	Fates, Edward (Ted)	0.70	428.40	64,674.90	WO	HD	TR
07/29/20	8160893	Analysis and determination of responsive documents in preparation for attorney review.	Peng, Simona	0.20	60.30	64,735.20	WO	HD	TR
07/29/20	8162301	Analysis of the crime coverage policies for 2018-2019 periods, assess prospective	Zaro, David	2.60	2,094.30	66,829.50	WO	HD	TR

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		insurance coverage, notice and claims, follow-up emails (1.9). Call with counsel concerning the insurance issues/policy/recovery issues (.4). Call related to the Adams matter and follow-up with litigation counsel (.3).							
07/29/20	8162938	Analysis and review of e-mails re: status of data processing and production issues.	Farrell, Michael	0.30	221.40	67,050.90	WO	HD	TR
07/29/20	8165547	Confer with counsel and S. Peng regarding repository production (.4); review correspondence regarding new subpoenas to be issued (.1); confer with counsel for CalPrivate Bank (.2); confer with Wells Fargo representative regarding subpoena (.3).	Aspis, Norman	1.00	445.50	67,496.40	WO	HD	TR
07/30/20	8160825	Discuss investigation into potential offshore account with Receiver (.2) analyze documents re: same (.3) call with Parks & Solar firm re: same (.2) call with counsel for CTC re: ANI repository documents (.2)	Fates, Edward (Ted)	0.90	550.80	68,047.20	WO	HD	TR
07/30/20	8160878	Analysis and determination of document productions in preparation for attorney review.	Peng, Simona	1.50	452.25	68,499.45	WO	HD	TR
07/30/20	8161776	Confer with counsel and S. Peng regarding Houts' production, and production from Merit Financial and Awerbuch (.9).	Aspis, Norman	0.90	400.95	68,900.40	WO	HD	TR
07/30/20	8161784	Confer with counsel regarding Chicago Title technical issue with repository production (.3); confer with counsel regarding first repository production issues (.4).	Aspis, Norman	0.70	311.85	69,212.25	WO	HD	TR

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07/30/20	8162419	Conference with counsel and address research related to insurance policy.	Zaro, David	0.40	322.20	69,534.45	WO	HD	TR	_____
07/30/20	8162928	Analysis and review of e-mails re: document production issues.	Farrell, Michael	0.20	147.60	69,682.05	WO	HD	TR	_____
07/31/20	8161946	Call with counsel for First Choice Bank re: status on Bandini property, Valle Vista property, and related issues (.3) communications with SEC counsel re: same (.3) analyze issues re: Endeavor Bank CDs and shares and discuss same with Receiver (.3) address issues re: ANI repository production (.2)	Fates, Edward (Ted)	1.10	673.20	70,355.25	WO	HD	TR	_____
07/31/20	8162630	Review, analysis and exchange of various e-mails re: non-subpoenaed documents in production and strategy to address same (.4); analysis and review of e-mails re: addressing issues with format of production (.3); drafted correspondence to investors' counsel re: payment for repository production (.2).	Farrell, Michael	0.90	664.20	71,019.45	WO	HD	TR	_____
07/31/20	8163152	Review issues re: insurance claim for criminal plea and confer with counsel re: the same.	Hsu, Tim	0.60	326.70	71,346.15	WO	HD	TR	_____
07/31/20	8165026	Finalize and transmit letter to IRS regarding The Fireside tax lien (.2); prepare subpoenas to Frontier Global Partners and lease agreement Jolla Bridge (.5); revise and finalize Bandini property motion (1.4); review Houts communications within Gina's emails (.7).	Aspis, Norman	2.80	1,247.40	72,593.55	WO	HD	TR	_____

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07/31/20	8165107	Confer with counsel and S. Peng regarding technical issues with repository production (.3).	Aspis, Norman	0.30	133.65	72,727.20	WO	HD	TR	_____
07/31/20	8165667	Analysis and determination of document productions in preparation for attorney review.	Peng, Simona	1.60	482.40	73,209.60	WO	HD	TR	_____
07/31/20	8166106	Research/analysis of insurance coverage issues related tot he crime policy, assess the projects for the Receiver's claim, follow-up with counsel.	Zaro, David	1.30	1,047.15	74,256.75	WO	HD	TR	_____
07/31/20	8166146	Follow-up with counsel related to the Rayment discovery and address further issues related interaction with Rayment, address the progress to close the SDI loan sale.	Zaro, David	0.60	483.30	74,740.05	WO	HD	TR	_____
08/03/20	8167041	Communications with SEC counsel, counsel for Champion-Cain, and counsel for S. Cain re: Bandini issues (.5) address ANI document repository cost issues (.2) discuss investigation into Endeavor Bank assets with counsel for Champion-Cain (.3) revise document subpoenas (.1) work on joint motion re: Bandini property (1.1)	Fates, Edward (Ted)	2.20	1,346.40	76,086.45	WO	HD	TR	_____
08/03/20	8167091	Analysis and determination of document productions in preparation for attorney review.	Peng, Simona	2.00	603.00	76,689.45	WO	HD	TR	_____
08/03/20	8168004	attention to collection of client documents	Neglia, Ross	0.50	150.75	76,840.20	WO	HD	TR	_____

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08/03/20	8168958	Call with Receiver, email related to the crime insurance claim (.4). Work on the draft of the letter regarding crime insurance claim/tender of the claim (.4). Follow-up on email from insurer, research concerning the policy terms and claim (1.4).	Zaro, David	2.20	1,772.10	78,612.30	WO	HD	TR	_____
08/03/20	8185235	Review, analysis and exchange of various e-mails re: investor counsel inquiries, data production/storage issues, and strategy to address upcoming productions.	Farrell, Michael	0.80	590.40	79,202.70	WO	HD	TR	_____
08/03/20	8192860	Attention to issues in connection with outstanding subpoenas (.3).	Aspis, Norman	0.30	133.65	79,336.35	WO	HD	TR	_____
08/04/20	8167828	Communications with SEC counsel re: third party subpoena productions and ANI document repository (.3) call with counsel for CTC re: document production issues and ANI repository (.2) advise Receiver re: same (.2) address data analysis and production issues for ANI repository (.6) discuss same with Receiver (.2) communications with Champion-Cain re: Endeavor Bank assets and related issues (.6) advise Receiver re: same (.2) communications with Parks & Solar firm re: same (.3)	Fates, Edward (Ted)	2.60	1,591.20	80,927.55	WO	HD	TR	_____
08/04/20	8168994	assist with document collection from defendant	Neglia, Ross	2.80	844.20	81,771.75	WO	HD	TR	_____
08/04/20	8170209	Analysis and determination of document productions in preparation for attorney review.	Peng, Simona	2.50	753.75	82,525.50	WO	HD	TR	_____

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08/04/20	8170948	Further analysis and research/evaluation of policy terms, application to circumstances and claim to insurer, prepare for conference with the insurance carrier.	Zaro, David	1.60	1,288.80	83,814.30	WO	HD	TR
08/04/20	8183669	Review and transmit subpoena responses to S. Hoslett (.3); pull relevant exhibits from Ovation Funding filing for S. Hoslett (.5); confer with F. McElroy regarding Weaver's subpoena response (.1); review correspondence from B. Williams regarding Awerbuch materials and review attached materials (.3); confer with counsel regarding repository production (.3).	Aspis, Norman	1.50	668.25	84,482.55	WO	HD	TR
08/04/20	8189401	Review, analysis and exchange of numerous e-mails re: repository issues, status and strategy.	Farrell, Michael	0.90	664.20	85,146.75	WO	HD	TR
08/04/20	8195324	Review insurance policies and research various issues re: coverage for Torres' theft (1.9); Prepare summary for counsel re: the same (0.6).	Hsu, Tim	2.50	1,361.25	86,508.00	WO	HD	TR
08/05/20	8168724	Address ANI repository issues and discuss same with Receiver (.2) communications with counsel for Champion-Cain re: Endeavor Bank assets (.8) advise on issues re: subpoenas issued to banks for Peterson account records and communications with counsel for Peterson re: same (.4) communications with SEC counsel and counsel for S. Cain re: Bandini issues (.5) advise on issues re: extension request re: Merit document production (.2)	Fates, Edward (Ted)	2.10	1,285.20	87,793.20	WO	HD	TR

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08/05/20	8170148	Attention to client document collection in advance of production	Neglia, Ross	1.70	512.55	88,305.75	WO	HD	TR
08/05/20	8170212	Analysis and determination of document productions in preparation for attorney review.	Peng, Simona	2.50	753.75	89,059.50	WO	HD	TR
08/05/20	8170982	Analysis of crime policy status and issues, follow-up email to/from counsel (.5). Prepare for/attend broker call/Marsh, follow-up with the Receiver and to Marsh's role, coverage (.8). Conference call with Receiver and Hiscox Insurance Company related to claim (.4).	Zaro, David	1.70	1,369.35	90,428.85	WO	HD	TR
08/05/20	8176164	Review and transmit subpoena responses from CalPrivate Bank and Western Alliance Bank (.6); finalize and transmit subpoenas to other entities for service (.4); confer with counsel and S. Hoslett regarding Peterson subpoenas (.4).	Aspis, Norman	1.40	623.70	91,052.55	WO	HD	TR
08/05/20	8189408	Analysis re: repository issues and exchanged e-mails re: same.	Farrell, Michael	0.40	295.20	91,347.75	WO	HD	TR
08/05/20	8189748	Further review, research and analysis of insurance policy for Torres' theft (1.1); Provide summary update to counsel re: the same (0.5).	Hsu, Tim	1.60	871.20	92,218.95	WO	HD	TR
08/05/20	8191393	several telephone calls and emails regarding hearing on motion for permission to file complaint against CTC.	Hartney, Mark	0.80	644.40	92,863.35	WO	HD	TR
08/06/20	8169491	Discuss data analysis, scanning/coding work and ANI repository issues with	Fates, Edward (Ted)	2.70	1,652.40	94,515.75	WO	HD	TR

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		Receiver (.7) call with Receiver, G. Rodriguez and Setec Investigations re: ANI repository data and issues with Google Vault shared data (.9) advise on subpoena production and protective order issues for Peterson bank account records, correspondence with counsel for K. Peterson re: same (.8) discuss subpoenas for J. Himmelberg accounts and life insurance policy with Receiver (.3)							
08/06/20	8170224	Analysis and determination of client documents in preparation for attorney review.	Peng, Simona	2.50	753.75	95,269.50	WO	HD	TR
08/06/20	8171410	Research/evaluate case law related to insurance policy/analysis and assess issues and strategy (.9). Calls and meeting with counsel and the receiver to address the crime policy legal analysis, the proof of claim narrative and records production and then follow-up on outline of narrative (.9).	Zaro, David	1.80	1,449.90	96,719.40	WO	HD	TR
08/06/20	8176029	Teleconference with counsel, receiver, and others regarding repository production (1); prepare for and participate in teleconference regarding Peterson subpoenas and confer with counsel regarding the same (.9); review correspondence from S. Hoslett regarding Peterson productions and email counsel regarding the same (.8); review correspondence regarding I. Awerbuch and Merit Financial subpoenas and confer with counsel regarding the same (.2); confer with counsel regarding additional subpoenas	Aspis, Norman	3.20	1,425.60	98,145.00	WO	HD	TR

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08/06/20	8189415	Preparation for and participation in conference call with team re: repository issues, challenges and strategy (1.2); review, analysis and exchange of e-mails re: response to Chicago Title request for information (.3).	Farrell, Michael	1.50	1,107.00	99,252.00	WO	HD	TR	_____
08/07/20	8170419	Communications with counsel for CTC re: document requests (.2) communications with counsel for First Choice and counsel for S. Cain re: potential settlement of Bandini issues (.2) advise Receiver re: same (.2) call/emails with SEC counsel and counsel for S. Cain re: Bandini settlement terms (.4) call with Receiver, G. Rodriguez and Setec Investigations re: next steps for ANI repository data production, timing and costs (.5)	Fates, Edward (Ted)	1.50	918.00	100,170.00	WO	HD	TR	_____
08/07/20	8171687	Analysis and determination of responsive documents in preparation for attorney review.	Peng, Simona	1.50	452.25	100,622.25	WO	HD	TR	_____
08/07/20	8171817	review custodial information for incoming data	Neglia, Ross	0.80	241.20	100,863.45	WO	HD	TR	_____
08/07/20	8171836	Review Houts' production and B. Williams email regarding Merit Financial and I. Awerbuch, and draft email to counsel regarding the same (3.2); confer with counsel for Merit Financial and I. Awerbuch regarding subpoenas and draft email regarding the same (.4); confer with Wells Fargo, Union Bank, and City National Bank	Aspis, Norman	3.90	1,737.45	102,600.90	WO	HD	TR	_____

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Trans Date	Index	Description of Service Rendered regarding subpoenas (.3).	Timekeeper	Hours	Fees	Sum	Circle	Action	
08/07/20	8171855	Work on draft/outline of the response to the Miscox claim, document request, review of records and research case law (1.9). Work on revisions to draft letter to insurer, email to Receiver (1.2).	Zaro, David	3.10	2,497.05	105,097.95	WO	HD	TR
08/07/20	8189611	Preparation for and participation in conference call re: repository issues (.5); review, analysis and exchange of e-mails re: investor payments, production issues and overall strategy (.4).	Farrell, Michael	0.90	664.20	105,762.15	WO	HD	TR
08/09/20	8171698	Analysis and determination of document productions in preparation for attorney review.	Peng, Simona	1.00	301.50	106,063.65	WO	HD	TR
08/10/20	8171631	Analyze and discuss Bandini deal points from counsel for S. Cain and next steps with Receiver (.4) prepare response to counsel for S. Cain, emails re: same (.5) communications with SEC counsel re: same (.3) communications with counsel for Champion-Cain and Receiver re: Bandini and Valle Vista issues (.4)	Fates, Edward (Ted)	1.60	979.20	107,042.85	WO	HD	TR
08/10/20	8172816	Review of document subpoena to Google.	Kaup, John	0.10	30.15	107,073.00	WO	HD	TR
08/10/20	8174503	Work on the draft of the Hiscox Confidentiality Agreement and emails with Receiver (1.4). Revise draft of Confidentiality Agreement (.3). Conference with counsel related to Hiscox claim recovery, legal underpinnings and	Zaro, David	1.90	1,530.45	108,603.45	WO	HD	TR

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		foundation for claim (.2).							
08/10/20	8191467	Review, analysis and exchange of various e-mails re: investor repository payments and document issues.	Farrell, Michael	0.40	295.20	108,898.65	WO	HD	TR _____
08/11/20	8172994	Review proposed joint motion re: liquidation of equities in Champion-Cain IRA account, communications with SEC counsel and counsel for Champion-Cain re: same (.5) address ANI document repository issues/costs and inquiries from investor groups re: payments and timing (.6) communications with Receiver re: same (.2) communications with counsel for Champion-Cain and Parks & Solar firm re: attorney-client privilege issue (.2) call with Parks & Solar firm re: offshore entity/bank account (.4) review/revise subpoenas to be issued to banks and insurance carrier re: J. Himmelberg accounts and insurance policy (.4) discuss Endeavor Bank CDs and privilege issues with counsel for Champion-Cain (.5) advise Receiver re: same (.1)	Fates, Edward (Ted)	2.90	1,774.80	110,673.45	WO	HD	TR _____
08/11/20	8173914	Prepare subpoenas for Himmelberg accounts and confer with counsel regarding the same (.5); confer with counsel regarding new subpoenas and and certain productions in response to subpoenas (.9).	Aspis, Norman	1.40	623.70	111,297.15	WO	HD	TR _____
08/11/20	8174028	Analysis and determination of client documents in preparation for attorney review.	Peng, Simona	1.00	301.50	111,598.65	WO	HD	TR _____

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08/11/20	8175532	Emails with counsel, revise draft of proof of insurance claim letter.	Zaro, David	0.40	322.20	111,920.85	WO	HD	TR
08/11/20	8189703	Review and provide comments to tender letter to Hiscox insurance and correspondence to counsel re: the same.	Hsu, Tim	0.50	272.25	112,193.10	WO	HD	TR
08/11/20	8191923	Review, analysis and exchange of e-mails re: investor repository payments and strategy to address same (.4); drafted correspondence to investor counsel and exchanged various e-mails re: same (.6); analysis and exchange of various e-mails re: data issues and volume (.4).	Farrell, Michael	1.40	1,033.20	113,226.30	WO	HD	TR
08/12/20	8174003	Follow up communications with Parks & Solar firm re: work on offshore entity (.2) calls/emails with Receiver and G. Rodriguez re: repository data issues, timing and costs (.7) address investor group inquiries re: repository data (.2) communications with Receiver and counsel for Champion-Cain re: Endeavor Bank CDs (.3)	Fates, Edward (Ted)	1.40	856.80	114,083.10	WO	HD	TR
08/12/20	8174022	Analysis and determination of client documents in preparation for attorney review.	Peng, Simona	1.90	572.85	114,655.95	WO	HD	TR
08/12/20	8192080	Conference call, analysis and exchange of numerous e-mails re: repository issues, investor payments and strategy going forward.	Farrell, Michael	1.20	885.60	115,541.55	WO	HD	TR
08/13/20	8175148	Address investor group inquiries/payments and issues with phased production of ANI	Fates, Edward (Ted)	2.20	1,346.40	116,887.95	WO	HD	TR

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		repository data (.4) address issues re: K. Peterson proposal to limit production of bank records and response to same (.7) discuss same with Receiver (.2) calls/emails with Receiver, G. Rodriguez and Setec Investigations re: ANI repository data, analysis, timing and costs (.9)							
08/13/20	8177990	Analysis and determination of client documents in preparation for attorney review.	Peng, Simona	1.80	542.70	117,430.65	WO	HD	TR
08/13/20	8178725	Confer with counsel regarding document production issues and subpoena issues (1).	Aspis, Norman	1.00	445.50	117,876.15	WO	HD	TR
08/13/20	8192193	Telephone conference and analysis re: Latham disqualification issues and potential impact on repository productions and timing (.3); preparation for and participation in conference call with team re: repository issues and strategy (1.1); review, analysis and exchange of numerous e-mails re: repository issues with client, team, and all counsel (.9).	Farrell, Michael	2.30	1,697.40	119,573.55	WO	HD	TR
08/14/20	8176179	Communications with Receiver re: ANI repository issues and next steps with Setec Investigations work (.7) communications with counsel for investor groups re: same (.2) call/emails with Parks & Solar firm re: work offshore entity for CBD business (.3) call/emails with counsel for K. Peterson re: document subpoena and ANI repository documents (.5) advise Receiver re: same (.2) work on document subpoena for offshore-related documents (.2)	Fates, Edward (Ted)	2.10	1,285.20	120,858.75	WO	HD	TR

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08/14/20	8177516	Review Houts' production and draft outline memorandum of potential claims (1.8); prepare, finalize, and serve several subpoenas (.7); review and transmit Wells Fargo's subpoena production (.3); confer with subpoena recipient representatives (.2).	Aspis, Norman	3.00	1,336.50	122,195.25	WO	HD	TR	_____
08/14/20	8177781	Calls with Receiver and counsel concerning investigation of claims recovery, including prospective interviews of witnesses, Ms. Champion-Cain (.6). Email with counsel concerning the interview (.2).	Zaro, David	0.80	644.40	122,839.65	WO	HD	TR	_____
08/14/20	8177959	Analysis and determination of responsive documents in preparation for attorney review.	Peng, Simona	1.70	512.55	123,352.20	WO	HD	TR	_____
08/14/20	8192239	Review, analysis and exchange of e-mails re: revisions to draft correspondence to all counsel (.4); exchanged e-mails with investor counsel re: same (.3); analysis and exchange of e-mails re: J. Ryan call and potential ex parte application and response to same (.4).	Farrell, Michael	1.10	811.80	124,164.00	WO	HD	TR	_____
08/17/20	8177803	Address issues/timing re: processing and production of ANI email data, analysis of Google Vault data (.7) revise letter to Endeavor Bank re: CDs, discuss same with Receiver (.4)	Fates, Edward (Ted)	1.10	673.20	124,837.20	WO	HD	TR	_____
08/17/20	8177958	Analysis and determination of responsive documents in preparation for attorney review.	Peng, Simona	2.60	783.90	125,621.10	WO	HD	TR	_____

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08/17/20	8189624	Review and analysis of various e-mails and materials re: repository issues and strategy.	Farrell, Michael	0.90	664.20	126,285.30	WO	HD	TR	_____
08/17/20	8193471	Download and review Weaver subpoena response (.3).	Aspis, Norman	0.30	133.65	126,418.95	WO	HD	TR	_____
08/18/20	8178795	Calls/emails with Receiver and Setec communications re: analysis of Google data and hard drive/user-created data for ANI repository (1.4) call/emails with counsel for Champion-Cain re: Bandini, Endeavor Bank, and ANI repository/privilege review issues (.6) advise on next steps for document subpoenas for Peterson-related accounts and protective order issues (.2) discuss protective order issues with Receiver (.1)	Fates, Edward (Ted)	2.30	1,407.60	127,826.55	WO	HD	TR	_____
08/18/20	8182816	Analysis and determination of responsive documents in preparation for attorney review and production.	Peng, Simona	4.50	1,356.75	129,183.30	WO	HD	TR	_____
08/18/20	8183554	Continue to extensively review Houts' production and prepare outline of potential claims, and confer with counsel regarding the same (3.4); confer with counsel regarding Peterson subpoenas, and confer with Wells Fargo representative regarding the same (.4); organize and transfer subpoena responses from City National Bank and Weaver, review Weaver production for audits (.6).	Aspis, Norman	4.40	1,960.20	131,143.50	WO	HD	TR	_____
08/18/20	8192258	Review, analysis and exchange of numerous e-mails re: repository production,	Farrell, Michael	0.90	664.20	131,807.70	WO	HD	TR	_____

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		remaining data issues and strategy going forward.							
08/19/20	8180020	Analyze and discuss with Receiver issues and next steps for user-created data from ANI hard drives, email data and Google drive data for ANI repository, timing and costs (1.5) analyze and discuss accounting re: purchase of Endeavor Bank shares with Receiver (.4)	Fates, Edward (Ted)	1.90	1,162.80	132,970.50	WO	HD	TR _____
08/19/20	8180820	Confer with EisnerAmper representative regarding subpoena and review notes regarding the same (.3).	Aspis, Norman	0.30	133.65	133,104.15	WO	HD	TR _____
08/19/20	8182817	Analysis and determination of responsive documents in preparation for attorney review and production.	Peng, Simona	3.20	964.80	134,068.95	WO	HD	TR _____
08/19/20	8193269	Review, analysis and exchange of e-mails re: potential new subpoena (.2); review, analysis and exchange of e-mails re: upcoming productions and other outstanding data (.4); preparation for and participation in conference call with team re: repository issues and strategy (.7); analysis and exchange of additional e-mails re: breakdown of data and processing priority (.3); outlined issues for communication to interested parties (.3).	Farrell, Michael	1.90	1,402.20	135,471.15	WO	HD	TR _____
08/20/20	8180934	Communications with Receiver re: CBB Venture/Endeavor Bank shares (.2) communications with counsel for S. Cain re: status on joint motion re: Bandini issues (.2) address ANI repository issues (.3) advise	Fates, Edward (Ted)	1.00	612.00	136,083.15	WO	HD	TR _____

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		on next steps re: third party subpoena productions and timing issues (.3)								
08/20/20	8181909	Review correspondence regarding subpoena to EisnerAmper and confer with counsel regarding the same (.5).	Aspis, Norman	0.50	222.75	136,305.90	WO	HD	TR	_____
08/20/20	8182818	Analysis and determination of responsive documents in preparation for attorney review and production.	Peng, Simona	2.80	844.20	137,150.10	WO	HD	TR	_____
08/20/20	8193314	Review, analysis and exchange of numerous e-mails re: outstanding data issues and resolution of same (.6); preparation for and participation in conference call with team re: repository issues and strategy to address same (.7); reviewed e-mail re: data sources and outlined issues for correspondence to interested parties (.4).	Farrell, Michael	1.70	1,254.60	138,404.70	WO	HD	TR	_____
08/21/20	8182104	Discuss investigation and analysis of transfers and issues re: CBB Venture/Endeavor Bank shares with Receiver (.4) discuss next steps re: ANI repository data analysis and phased productions with Receiver (.4) analyze and revise correspondence to CTC and investor groups re: repository production and timing (.7) discuss same with Receiver (.2)	Fates, Edward (Ted)	1.70	1,040.40	139,445.10	WO	HD	TR	_____
08/21/20	8182815	Analysis and determination of responsive documents in preparation for attorney review and production.	Peng, Simona	3.30	994.95	140,440.05	WO	HD	TR	_____

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08/21/20	8193613	Analysis and exchange of e-mails re: DISCO and e-mail issues (.4); drafted correspondence to interested parties re: data issues, timing and process (.8); multiple telephone conferences, analysis, review of documents and exchange of e-mails re: correspondence issues, language and strategy (1.6); finalized and distributed correspondence to interested parties (.3).	Farrell, Michael	3.10	2,287.80	142,727.85	WO	HD	TR	_____
08/22/20	8182814	Analysis and determination of responsive documents in preparation for attorney review and production.	Peng, Simona	1.80	542.70	143,270.55	WO	HD	TR	_____
08/22/20	8193667	Analysis and review of e-mails re: updates on data processing.	Farrell, Michael	0.30	221.40	143,491.95	WO	HD	TR	_____
08/23/20	8182901	Analysis and determination of responsive documents in preparation for attorney review.	Peng, Simona	0.50	150.75	143,642.70	WO	HD	TR	_____
08/23/20	8193674	Reviewed e-mail re: further update on data processing and analysis re: effect of same on third party production.	Farrell, Michael	0.20	147.60	143,790.30	WO	HD	TR	_____
08/24/20	8183687	Analyze info from Receiver re: ANI purchase of Endeavor Bank shares (.6) discuss same with Receiver (.2) advise on subpoena needed for documents related to Endeavor Bank shares (.3) communications with counsel for Champion-Cain re: Endeavor shares (.5) revisions to draft joint motion re: Bandini settlement (1.2) discuss same with Receiver (.1)	Fates, Edward (Ted)	2.90	1,774.80	145,565.10	WO	HD	TR	_____

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08/24/20	8189201	Analysis and determination of responsive documents in preparation for attorney review.	Peng, Simona	1.00	301.50	145,866.60	WO	HD	TR
08/24/20	8193865	Analysis and review of e-mails re: data issues and next steps.	Farrell, Michael	0.30	221.40	146,088.00	WO	HD	TR
08/25/20	8184407	Analyze and advise on steps to investigate/recover on ANI investment/transfer, discuss same with Receiver (.4) communications with CTC counsel re: subpoena and document production issues (.2)	Fates, Edward (Ted)	0.60	367.20	146,455.20	WO	HD	TR
08/25/20	8186021	Review of the draft Hixcox coverage letter, follow-up emails with Receiver related to letter/documents.	Zaro, David	0.70	563.85	147,019.05	WO	HD	TR
08/25/20	8189205	Analysis and determination of responsive documents in preparation for attorney review.	Peng, Simona	1.00	301.50	147,320.55	WO	HD	TR
08/25/20	8194453	Reviewed e-mail re: data processing update and analysis re: completion of same.	Farrell, Michael	0.20	147.60	147,468.15	WO	HD	TR
08/26/20	8185637	Revise document subpoena to Endeavor Bank re: stock/options and accounts (.3) work on letter and subpoena to Second Source re: ANI investment (.5) discuss issues re: Second Source with Receiver (.3)	Fates, Edward (Ted)	1.10	673.20	148,141.35	WO	HD	TR
08/26/20	8189203	Analysis and determination of responsive documents in preparation for attorney review.	Peng, Simona	1.00	301.50	148,442.85	WO	HD	TR

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08/26/20	8193323	Commence drafting letter to S. Metzger regarding claims against R. Houts (.3); draft subpoena and letter to Second Source (.7); draft subpoena to Endeavor Bank (.3).	Aspis, Norman	1.30	579.15	149,022.00	WO	HD	TR
08/26/20	8195216	elephone conference with T. Fates regarding strategy for hearing; attend telephonically hearing on motion to pursue claim against CTC	Hartney, Mark	1.40	1,127.70	150,149.70	WO	HD	TR
08/27/20	8187817	Follow up communications to CTC counsel re: subpoena production and cell phone data	Fates, Edward (Ted)	0.10	61.20	150,210.90	WO	HD	TR
08/27/20	8189204	Analysis and determination of responsive documents in preparation for attorney review.	Peng, Simona	1.50	452.25	150,663.15	WO	HD	TR
08/27/20	8189359	Review, analysis and exchange of numerous e-mails re: repository issues and response to Chicago Title inquiry.	Farrell, Michael	0.70	516.60	151,179.75	WO	HD	TR
08/27/20	8193127	Draft and revise letter to S. Metzger regarding claims against R. Houts, corresponding tolling agreement, and subpoena (1.2).	Aspis, Norman	1.20	534.60	151,714.35	WO	HD	TR
08/28/20	8188687	Conference call/emails with Receiver re: ANI repository production, privilege review, data analysis and related issues (.7) calls with counsel for Champion-Cain re: issues relating to privilege review/log for ANI document repository and Endeavor Bank shares (.6) advise Receiver re: same (.2)	Fates, Edward (Ted)	1.50	918.00	152,632.35	WO	HD	TR

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08/28/20	8188802	Evaluate Court Order concerning conflicts matter, assess impact on litigation/discover.	Zaro, David	0.30	241.65	152,874.00	WO	HD	TR
08/28/20	8189202	Analysis and determination of responsive documents in preparation for attorney review.	Peng, Simona	2.00	603.00	153,477.00	WO	HD	TR
08/28/20	8189384	Preparation for and participation in conference call with client re: repository issues and strategy (.7); review, analysis and exchange of e-mails re: privilege document issues and strategy (.5).	Farrell, Michael	1.20	885.60	154,362.60	WO	HD	TR
08/29/20	8194371	Follow-up on the crime insurance/foundational documents.	Zaro, David	0.30	241.65	154,604.25	WO	HD	TR
08/30/20	8189974	Analysis and determination of responsive documents in preparation for attorney review.	Peng, Simona	0.50	150.75	154,755.00	WO	HD	TR
08/31/20	8190664	Discuss revisions to joint motion re: Bandini settlement with Receiver (.3) work on revisions to joint motion (.9) communications with SEC counsel and counsel for S. Cain re: same (.3) address issues with ANI repository data, analysis and production of same (.3) call with Receiver re: same (.4) discuss issues re: Endeavor Bank shares with Receiver (.2) analyze issues regarding HAV Global document production (.3)	Fates, Edward (Ted)	2.70	1,652.40	156,407.40	WO	HD	TR
08/31/20	8192818	Review edits to letter to S. Metzger and confer with counsel regarding the same and various subpoena issues (.5).	Aspis, Norman	0.50	222.75	156,630.15	WO	HD	TR

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08/31/20	8193943	Analysis and determination of client documents in preparation for attorney review.	Peng, Simona	1.00	301.50	156,931.65	WO	HD	TR
08/31/20	8194803	Review, analysis and exchange of e-mails with CTC counsel re: hard drive (.2); review, analysis and exchange of various e-mails re: e-mail and other repository issues (.6); preparation for and participation in conference call re: DISCO data review and timing/strategy going forward (.5).	Farrell, Michael	1.30	959.40	157,891.05	WO	HD	TR
09/01/20	8193779	Analyze issues re: HAV Global/Frontier/La Jolla Bridge document production and connections to plaintiffs in Levin action (.4) discuss same with Receiver (.3) analyze info from Receiver re: Chicago Escrows and T entity/accounts and related issues (.6) discuss same with Receiver (.4) analyze issues re: CTC cell phone data production (.4) communications with counsel for CTC re: same (.2) analyze issues re: Endeavor Bank shares (.2) calls with Receiver and counsel for Champion-Cain re: same and privilege review for ANI repository (.7) analyze info from counsel for Champion-Cain re: possible Cultivate account and discuss same with Receiver (.3) communications with counsel for First Choice Bank re: Bandini issues (.2)	Fates, Edward (Ted)	3.70	2,264.40	160,155.45	WO	HD	TR
09/01/20	8198632	Emails with counsel concerning discovery issues with CTC employees.	Zaro, David	0.40	322.20	160,477.65	WO	HD	TR
09/01/20	8201155	Prepare and transmit for service subpoena to Endeavor Bank (.4); prepare and transmit	Aspis, Norman	2.20	980.10	161,457.75	WO	HD	TR

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		for service subpoena to Second Source (.4); draft letter to Second Source for information (.5); confer with counsel regarding production from HAV/Frontier/La Jolla Bridge, and confer with J. Kirby regarding structural relationship (.4); review production from AMEX and confer with L. Ryan regarding the same (.5).							
09/01/20	8211114	review and respond to emails regarding cell phone discovery, status, strategy	Hartney, Mark	0.30	241.65	161,699.40	WO	HD	TR
09/01/20	8216351	Reviewed court ruling and exchanged various e-mails re: same (.4); review, analysis and exchange of e-mails re: production to Chicago Title counsel (.3); analysis and exchange of e-mails re: repository and possible additional data issues (.4).	Farrell, Michael	1.10	811.80	162,511.20	WO	HD	TR
09/02/20	8196003	Advise on document subpoenas needed for potential Cultivate account and Chase communications (.3) communications with counsel for Champion-Cain re: potential Cultivate account (.1) address ANI repository production issues and timing (.4) communications with SEC counsel re: Bandini joint motion (.1)	Fates, Edward (Ted)	0.90	550.80	163,062.00	WO	HD	TR
09/02/20	8198987	Analysis and determination of document productions in preparation for attorney review.	Peng, Simona	1.00	301.50	163,363.50	WO	HD	TR
09/02/20	8200823	Work on the open issues regarding crime insurance letter and foundation for the claims, follow-up with counsel (.4).	Zaro, David	0.40	322.20	163,685.70	WO	HD	TR

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09/02/20	8201123	Review productions from several subpoena recipients and transmit the same to the team (.7); confer with R. Edmunds regarding subpoena to Endeavor Bank (.4); review and revise letter to S. Metzger (.4).	Aspis, Norman	1.50	668.25	164,353.95	WO	HD	TR	_____
09/02/20	8217279	Review, analysis and exchange of e-mails re: DISCO and repository issues, timing and strategy (.5); reviewed e-mail from investor counsel and exchanged various e-mails re: response to same (.2); reviewed e-mail from additional investor counsel, exchanged e-mails re: information requested and drafted response to counsel (.4).	Farrell, Michael	1.10	811.80	165,165.75	WO	HD	TR	_____
09/03/20	8197081	Advise on issues re: letter and document subpoena to Jacko Law Group (.4) discuss revisions to Bandini joint motion with SEC counsel and Receiver (.4)	Fates, Edward (Ted)	0.80	489.60	165,655.35	WO	HD	TR	_____
09/03/20	8198113	Review, analysis and exchange of e-mails re: investor and CTC hard drive issues, timing and strategy.	Farrell, Michael	0.30	221.40	165,876.75	WO	HD	TR	_____
09/03/20	8199088	Analysis and determination of document productions in preparation for attorney review.	Peng, Simona	0.30	90.45	165,967.20	WO	HD	TR	_____
09/03/20	8201082	Review files regarding attorney conflicts of interest in anticipation of transmitting letter to S. Metzger, and confer with counsel regarding the same (.5); confer with counsel regarding HAV/Frontier/La Jolla Bridge (.1); confer with A. Machala regarding previous Endeavor Bank subpoena (.2).	Aspis, Norman	0.80	356.40	166,323.60	WO	HD	TR	_____

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09/04/20	8198885	Review K1 and member letter from 2Budz, discuss same with Receiver (.4) communications with Receiver re: Bandini joint motion (.3) finalize revisions to same (.4) communications with counsel for S. Cain and counsel for Champion-Cain re: same (.2) follow up communications with CTC counsel re: cell phone data (.1) address issues re: ANI repository and timing/update to interested parties re: same (.3)	Fates, Edward (Ted)	1.70	1,040.40	167,364.00	WO	HD	TR	_____
09/04/20	8198956	Review draft letter to S. Metzger regarding potential claims against Houts and finalize the same (.4); transmit document production to K. Freitag (.2); draft email to J. Kirby regarding the relationship between certain corporate entities and confer with L. Ryan regarding the same (.2).	Aspis, Norman	0.80	356.40	167,720.40	WO	HD	TR	_____
09/04/20	8217297	Review, analysis and exchange of various e-mails re: repository updates, timing and strategy.	Farrell, Michael	0.60	442.80	168,163.20	WO	HD	TR	_____
09/08/20	8199159	Communications with Receiver and counsel re: ANI repository issues, timing of productions, and related issues (.4) communications with W. Caldarelli re: subpoena issued to Second Source Solutions (.2) address issues re: document subpoena issued to Endeavor Bank (.2) communications with Receiver re: Peterson-related accounts and credit card activity (.3)	Fates, Edward (Ted)	1.10	673.20	168,836.40	WO	HD	TR	_____

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09/08/20	8199863	Analysis and determination of responsive documents in preparation for attorney review.	Peng, Simona	0.50	150.75	168,987.15	WO	HD	TR
09/08/20	8217314	Analysis and review of e-mails re: new production and handling of same.	Farrell, Michael	0.30	221.40	169,208.55	WO	HD	TR
09/09/20	8200592	Address issues re: Endeavor Bank document production (.2) advise on issues regarding ANI repository rolling production (.2)	Fates, Edward (Ted)	0.40	244.80	169,453.35	WO	HD	TR
09/09/20	8201650	Conference with counsel related to crime letter and insurance coverage issues.	Zaro, David	0.30	241.65	169,695.00	WO	HD	TR
09/09/20	8208762	Analysis and determination of responsive documents in preparation for attorney review.	Peng, Simona	1.50	452.25	170,147.25	WO	HD	TR
09/09/20	8217738	Review, analysis and exchange of e-mails with investor counsel re: production issues (.3); analysis and review of e-mails re: production of user-created data (.2).	Farrell, Michael	0.50	369.00	170,516.25	WO	HD	TR
09/09/20	8223109	Review document production from Endeavor Bank and confer with counsel regarding the same (.3); review case law relating to C. Riharb issues and confer with counsel regarding the same (1.2); review edits to R. Houts letter (.3).	Aspis, Norman	1.80	801.90	171,318.15	WO	HD	TR
09/10/20	8201176	Follow up communications with counsel for CTC re: subpoena document production (.1) advise on issues re: JP Morgan Chase document subpoena (.2) analyze information from counsel for HAV	Fates, Edward (Ted)	0.70	428.40	171,746.55	WO	HD	TR

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		Global/Frontier/La Jolla Bridge re: loans/investments, discuss same with Receiver (.4)								
09/10/20	8202815	Evaluate records received from Receiver to support the insurance claim as to crime insurance re: Torres (.6). Analysis of letter based on receipt of records and revise same, confidentiality agreement, finalize same (1.2). Work on compilation of documents/pleadings to support the claim (1.1).	Zaro, David	2.90	2,335.95	174,082.50	WO	HD	TR	_____
09/10/20	8217804	Review, analysis and exchange of e-mails with investor counsel re: production issues (.3); analysis and exchange of various e-mails re: status of hard drive data production and strategy going forward (.5).	Farrell, Michael	0.80	590.40	174,672.90	WO	HD	TR	_____
09/10/20	8223296	Confer with counsel and subpoena recipients regarding various subpoenas (.4).	Aspis, Norman	0.40	178.20	174,851.10	WO	HD	TR	_____
09/11/20	8202232	Advise on document subpoena to JP Morgan Chase re: communications relating to ANI-related accounts (.3) conference call with Receiver and outside vendor re: analysis/sorting of remaining ANI repository data to be produced (.9) discuss strategy re: same with Receiver (.4) analyze documents received from Endeavor Bank relating to ownership of shares of stock (.7) discuss same with Receiver (.2)	Fates, Edward (Ted)	2.50	1,530.00	176,381.10	WO	HD	TR	_____
09/11/20	8203155	attend team call re: document collection strategy	Neglia, Ross	0.80	241.20	176,622.30	WO	HD	TR	_____

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09/11/20	8204805	Review and transmit production from Endeavor Bank (.3); draft subpoena to JP Morgan Chase (.5).	Aspis, Norman	0.80	356.40	176,978.70	WO	HD	TR	_____
09/11/20	8206458	Email with counsel, assess the proof of loss issues and follow-up on Hiscox Insurance loss form and information (.4).	Zaro, David	0.40	322.20	177,300.90	WO	HD	TR	_____
09/11/20	8208783	Analysis and determination of responsive documents in preparation for attorney review.	Peng, Simona	1.80	542.70	177,843.60	WO	HD	TR	_____
09/11/20	8217990	Preparation for and participation in conference call with team re: data production issues and strategy (1.1); reviewed memorandum summarizing results of call and exchanged e-mails re: same (.3).	Farrell, Michael	1.40	1,033.20	178,876.80	WO	HD	TR	_____
09/14/20	8204745	Confer with M. Nagata regarding document production and counsel regarding production from B. Edmunds (.2).	Aspis, Norman	0.20	89.10	178,965.90	WO	HD	TR	_____
09/14/20	8204953	Advise on next steps re: outstanding document subpoenas issued to Parks & Solar firm and Merit Financial (.2) call with counsel for CTC re: production of cell phone data (.3) advise Receiver re: same (.1) communications with counsel for Second Source re: document production (.2)	Fates, Edward (Ted)	0.80	489.60	179,455.50	WO	HD	TR	_____
09/14/20	8205625	identify potential responsive materials for production to interested parties	Neglia, Ross	0.90	271.35	179,726.85	WO	HD	TR	_____

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09/14/20	8206625	Email/call concerning the crime insurance letter and address next steps.	Zaro, David	0.20	161.10	179,887.95	WO	HD	TR
09/14/20	8218136	Analysis and review of e-mail re: cell phone data (.1); review, analysis and exchange of e-mails with investor counsel re: data production (.3).	Farrell, Michael	0.40	295.20	180,183.15	WO	HD	TR
09/15/20	8204962	Advise on issues re: ANI document repository and status/timing of productions, responses to inquiries from interested non-parties (.6) conference call with Receiver and e-discovery vendor re: repository data analysis, processing and next steps (1.1) advise Receiver on issues with Endeavor Bank shares (.4)	Fates, Edward (Ted)	2.10	1,285.20	181,468.35	WO	HD	TR
09/15/20	8206063	Confer with R. Edmunds regarding document production (.4).	Aspis, Norman	0.40	178.20	181,646.55	WO	HD	TR
09/15/20	8208266	identify potentially responsive materials for production to interested parties	Neglia, Ross	2.30	693.45	182,340.00	WO	HD	TR
09/15/20	8208794	Analysis and determination of responsive documents in preparation for attorney review.	Peng, Simona	2.50	753.75	183,093.75	WO	HD	TR
09/15/20	8218345	Preparation for and participation in conference call with team re: data processing and production issues (1.2); review, analysis and exchange of various e-mails re: production issues and response to investor counsel inquiries (.7).	Farrell, Michael	1.90	1,402.20	184,495.95	WO	HD	TR
09/16/20	8207156	Communications with counsel for S. Cain re: status of draft joint motion re: Bandini	Fates, Edward (Ted)	1.10	673.20	185,169.15	WO	HD	TR

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		property (.3) follow up communications with Chicago Title re: production of former employee cell phone data (.4) address ANI repository issues and communications to interested non-parties re: same (.4)							
09/16/20	8208255	identify potentially-responsive materials for production to interested parties	Neglia, Ross	1.80	542.70	185,711.85	WO	HD	TR
09/16/20	8212046	Finalize and serve subpoena to JP Morgan Chase (.3); confer with M. Nagata and S. Metzger regarding outstanding issues in connections with subpoenas (.3).	Aspis, Norman	0.60	267.30	185,979.15	WO	HD	TR
09/16/20	8218441	Review, analysis and exchange of e-mails re: next production (.2); drafted e-mail to interested parties and exchanged e-mails re: edits to same (.6); review, analysis and exchange of e-mails re: deleted e-mails and strategy to address same (.3).	Farrell, Michael	1.10	811.80	186,790.95	WO	HD	TR
09/17/20	8207128	Multiple calls/emails with Receiver and vendor re: approach and costs for remaining ANI repository work, recovery of deleted documents via Google Vault, issues with Champion-Cain privilege review/costs, and issues concerning encryption/security of Setec hard drives (1.9) advise re: review/analysis of Parks & Solar document production (.3)	Fates, Edward (Ted)	2.20	1,346.40	188,137.35	WO	HD	TR
09/17/20	8207895	Confer with subpoena recipients regarding productions and review incoming productions (.5).	Aspis, Norman	0.50	222.75	188,360.10	WO	HD	TR

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09/17/20	8208244	Revise Confidentiality Agreement and address final revisions to Hiscox letter (.4). Address insurance contract notice issues and conferences as to service/documents to support claim (.5).	Zaro, David	0.90	724.95	189,085.05	WO	HD	TR
09/17/20	8208382	identify additional potentially-responsive materials for production to interested parties	Neglia, Ross	2.30	693.45	189,778.50	WO	HD	TR
09/17/20	8208808	Analysis and determination of responsive documents in preparation for attorney review.	Peng, Simona	2.00	603.00	190,381.50	WO	HD	TR
09/17/20	8219857	Preparation for and participation in conference call with Receiver re: repository issues and strategy (.8); review, analysis and exchange of numerous e-mails and review of documents/materials re: repository, costs, investor access and strategy issues (1.3).	Farrell, Michael	2.10	1,549.80	191,931.30	WO	HD	TR
09/18/20	8208257	Advise on response to request for further extension to produce documents in response to subpoena issued to Merit Financial (.2) advise on issues re: vendor costs for repository data analysis/processing (.4) calls/emails with Receiver, SEC counsel, counsel for S. Cain, and counsel for Champion-Cain re: Bandini joint motion (.8)	Fates, Edward (Ted)	1.40	856.80	192,788.10	WO	HD	TR
09/18/20	8208813	Analysis and determination of responsive documents in preparation for attorney review.	Peng, Simona	0.50	150.75	192,938.85	WO	HD	TR

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09/18/20	8209325	Confer with Awerbuch's counsel regarding document production, and confer with counsel regarding the same (.4).	Aspis, Norman	0.40	178.20	193,117.05	WO	HD	TR
09/18/20	8209573	assist with production of ani repository documents to interested parties	Neglia, Ross	1.70	512.55	193,629.60	WO	HD	TR
09/18/20	8212704	Work/call with counsel concerning production of records from third parties and attorney - law firm subpoena.	Zaro, David	0.30	241.65	193,871.25	WO	HD	TR
09/18/20	8219932	Telephone conference and analysis re: compilation of information on data sources, status and production (.3); review, analysis and exchange of e-mails re: investor counsel request for hard drive and feasibility of same (.4); analysis, review of documents and exchange of e-mails re: DISCO and repository issues and strategy (.4).	Farrell, Michael	1.10	811.80	194,683.05	WO	HD	TR
09/19/20	8211582	Analysis and exchange of e-mails re: investor counsel request and response to same.	Farrell, Michael	0.20	147.60	194,830.65	WO	HD	TR
09/21/20	8209418	Address issues re: data collection from Google Vault, analysis of same, and analysis of ANI hard drive data for selected custodians for ANI repository (.6) address inquiry from counsel for First Choice Bank re: Bandini issues (.4) advise on next steps and follow up re: outstanding subpoenas and associated document productions (.3) initial review of CTC employee communications (.4)	Fates, Edward (Ted)	1.70	1,040.40	195,871.05	WO	HD	TR

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09/21/20	8210760	consolidate ANI productions for transmittal to interested parties	Neglia, Ross	1.50	452.25	196,323.30	WO	HD	TR	_____
09/21/20	8210784	Review correspondence from Chicago Title and confer with counsel and S. Peng regarding the same (.5); confer with S. Savitt regarding production from Eisner Amper (.2); confer with M. Nagata regarding production from I. Awerbuch and Merit Financial (.2); confer with S. Metzger regarding production and letter (.2); confer with counsel regarding Peterson production (.2); review Peterson production issues and develop global document review strategy (1.1).	Aspis, Norman	2.40	1,069.20	197,392.50	WO	HD	TR	_____
09/21/20	8211577	Review, analysis and exchange of various e-mails re: data processing, production and strategy issues.	Farrell, Michael	0.90	664.20	198,056.70	WO	HD	TR	_____
09/21/20	8211760	Analysis and determination of responsive documents in preparation for attorney review.	Peng, Simona	1.00	301.50	198,358.20	WO	HD	TR	_____
09/21/20	8212816	Several conferences with counsel concerning the records production issues as to the document compilation.	Zaro, David	0.40	322.20	198,680.40	WO	HD	TR	_____
09/21/20	8212872	Identify additional relevant ANI data for production to interested parties	Neglia, Ross	3.10	934.65	199,615.05	WO	HD	TR	_____
09/22/20	8210835	Address document management issues re: CTC employee communications (.4) review/analyze communications (.7) discuss same with Receiver (.6) discuss issues concerning Endeavor Bank shares with	Fates, Edward (Ted)	3.60	2,203.20	201,818.25	WO	HD	TR	_____

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		Receiver and counsel for Champion-Cain (.8) address issues re: Champion-Cain request for PST files (.4) communications with counsel for Champion-Cain re: Bandini and Valle Vista issues (.2) address ANI repository data processing steps and budget/cost issues (.6) communications with vendor re: same (.2)								
09/22/20	8211754	Analysis and determination of document productions in preparation for attorney review.	Peng, Simona	3.50	1,055.25	202,873.50	WO	HD	TR	_____
09/22/20	8211928	Review and revise subpoena tracking chart and confer with L. Ryan and S. Hoslett regarding the same (.7); confer with M. Nagata and S. Metzger regarding various issues (.2).	Aspis, Norman	0.90	400.95	203,274.45	WO	HD	TR	_____
09/22/20	8212869	Identify additional relevant ANI data for production to interested parties	Neglia, Ross	3.30	994.95	204,269.40	WO	HD	TR	_____
09/22/20	8220025	Review, analysis and exchange of numerous e-mails re: investor inquiries, DISCO issues and open processing/production issues.	Farrell, Michael	0.90	664.20	204,933.60	WO	HD	TR	_____
09/23/20	8212164	Address issues re: Champion-Cain request for email files and outside vendor data collection from Google Vault (.7) communications with Receiver re: same (.2) communications with counsel for Champion-Cain (.3) address issues re: production of additional ANI repository data from hard drives (.2) communications with Receiver re: Endeavor shares	Fates, Edward (Ted)	1.80	1,101.60	206,035.20	WO	HD	TR	_____

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Trans Date	Index	Description of Service Rendered	Timekeeper	Hours	Fees	Sum	Circle	Action	
		documentation (.2) communications with SEC counsel re: Bandini-related issues (.2)							
09/23/20	8212880	Identify additional relevant ANI data for production to interested parties	Neglia, Ross	2.60	783.90	206,819.10	WO	HD	TR _____
09/23/20	8216048	Confer with JP Morgan Chase representative regarding subpoena production (.3); confer with M. Nagata regarding production issues (.2).	Aspis, Norman	0.50	222.75	207,041.85	WO	HD	TR _____
09/23/20	8220092	Analysis and review of various e-mails re: data processing and production issues and strategy.	Farrell, Michael	0.50	369.00	207,410.85	WO	HD	TR _____
09/23/20	8220176	Analysis and determination of responsive documents in preparation for attorney review.	Peng, Simona	2.80	844.20	208,255.05	WO	HD	TR _____
09/24/20	8213662	Address ANI repository data processing issues and questions from vendor re: same	Fates, Edward (Ted)	0.20	122.40	208,377.45	WO	HD	TR _____
09/24/20	8215162	Identify additional relevant ANI data for production to interested parties	Neglia, Ross	2.40	723.60	209,101.05	WO	HD	TR _____
09/24/20	8220150	Analysis and exchange of e-mails re: new production status and timing.	Farrell, Michael	0.20	147.60	209,248.65	WO	HD	TR _____
09/24/20	8220200	Analysis and determination of responsive documents in preparation for attorney review.	Peng, Simona	2.00	603.00	209,851.65	WO	HD	TR _____
09/25/20	8214309	Analyze issues re: Endeavor bank shares and frozen account (.4) discuss same with Receiver (.3) work on letter to Computershare re: shares (.4)	Fates, Edward (Ted)	1.80	1,101.60	210,953.25	WO	HD	TR _____

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Fees for Matter 378827.00003.(SEC v. Champion-Cain - Asset Investigati)

Trans Date	Index	Description of Service Rendered	Timekeeper	Hours	Fees	Sum	Circle Action			
		communications with counsel for Champion-Cain re: same (.4) advise on next steps concerning outstanding subpoenas issued to Merit Financial and I. Awerbach and delay in productions (.3)								
09/25/20	8215567	Review, analysis and exchange of various e-mails re: new production (.4); drafted correspondence to all interested parties re: same (.3); reviewed counsel inquiry and analysis re: response to same (.2).	Farrell, Michael	0.90	664.20	211,617.45	WO	HD	TR	_____
09/25/20	8215956	Confer with counsel regarding outstanding productions (.2).	Aspis, Norman	0.20	89.10	211,706.55	WO	HD	TR	_____
09/27/20	8215564	Analysis and exchange of e-mails re: recent production issues.	Farrell, Michael	0.20	147.60	211,854.15	WO	HD	TR	_____
09/28/20	8216025	Communications with SEC counsel re: Bandini joint motion issues (.3) address issues re: letter to Computershare re: Endeavor shares (.3) review communications and related documents produced by CTC (1.1) address issues re: Google shared data portion of ANI repository and document productions (.4) advise and advise on next steps re: outstanding subpoena issued to Merit Financial and proposed tolling agreement (.5)	Fates, Edward (Ted)	2.60	1,591.20	213,445.35	WO	HD	TR	_____
09/28/20	8220233	Analysis and determination of document productions in preparation for attorney review.	Peng, Simona	1.00	301.50	213,746.85	WO	HD	TR	_____

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Fees for Matter 378827.00003.(SEC v. Champion-Cain - Asset Investigati)

Trans Date	Index	Description of Service Rendered	Timekeeper	Hours	Fees	Sum	Circle	Action	
09/28/20	8221480	Review, analysis and exchange of e-mails re: addressing investor counsel requests for data (.3); analysis and exchange of e-mails re: owned data issues and plan for addressing shared data issue (.4).	Farrell, Michael	0.70	516.60	214,263.45	WO	HD	TR
09/28/20	8222618	Draft letter to Computershare and confer with counsel regarding the same (.4).	Aspis, Norman	0.40	178.20	214,441.65	WO	HD	TR
09/28/20	8222773	Review documents produced by K. Peterson (1.1).	Aspis, Norman	1.10	490.05	214,931.70	WO	HD	TR
09/29/20	8217303	Advise on issues re: document production and privilege log from EisnerAmper (.3) analyze and advise on document/data management issues and vendor costs (.6) discuss Google Vault data collection work with Receiver and vendor (.7)	Fates, Edward (Ted)	1.60	979.20	215,910.90	WO	HD	TR
09/29/20	8221520	Review, analysis and exchange of e-mails re: compilation of data summary, review of shared data, and strategy for next steps.	Farrell, Michael	0.90	664.20	216,575.10	WO	HD	TR
09/29/20	8222323	Confer with counsel regarding production from EisnerAmper (.2).	Aspis, Norman	0.20	89.10	216,664.20	WO	HD	TR
09/30/20	8220198	Identify additional relevant ANI data for production to interested parties	Neglia, Ross	2.30	693.45	217,357.65	WO	HD	TR
09/30/20	8220223	Analysis and determination of responsive documents in preparation for attorney review.	Peng, Simona	2.80	844.20	218,201.85	WO	HD	TR
09/30/20	8221578	Review, analysis and exchange of various e-mails re: data chart, including review of draft chart (.4); review and analysis of e-	Farrell, Michael	0.90	664.20	218,866.05	WO	HD	TR

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EXHIBIT A**Fees for Matter 378827.00003.(SEC v. Champion-Cain - Asset Investigati)**

Trans Date	Index	Description of Service Rendered	Timekeeper	Hours	Fees	Sum	Circle	Action
		mails re: shared data and additional drives issues (.3); analysis and review of e-mails re: cost calculations for repository (.2).						
09/30/20	8221891	Advise on ANI repository document filtering and production issues, communications with vendor re: same	Fates, Edward (Ted)	0.40	244.80	219,110.85	WO	HD TR
09/30/20	8222116	Confer with M. Nagata and S. Metzger regarding production issues in connection with outstanding subpoenas (.5).	Aspis, Norman	0.50	222.75	219,333.60	WO	HD TR

Proforma Summary

Timekeeper Number	Timekeeper	Hours	Rate	Amounts
000181	Hartney, Mark	2.50	805.50	2,013.75
000313	Zaro, David	35.10	805.50	28,273.05
000739	Farrell, Michael	60.30	738.00	44,501.40
000820	Kaup, John	0.10	301.50	30.15
001665	Fates, Edward (Ted)	108.10	612.00	66,157.20
002055	Hsu, Tim	5.20	544.50	2,831.40
002307	Peng, Simona	107.60	301.50	32,441.40
002369	Aspis, Norman	69.10	445.50	30,784.05
002448	Neglia, Ross	40.80	301.50	12,301.20
		428.80		\$219,333.60
Subtotal Fees				\$219,333.60
Discount				0.00
Total Fees				219,333.60
Total Disbursements				0.00

Attorney Billing Instructions

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

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Billing Instructions

expires 6/30/2021: 10% off standard rates (automatic); no text editing; copies @ .10

Account Summary – As Of 02/10/21

	Fiscal YTD			Calendar YTD			LTD		
	Total	Fees	Disb.	Total	Fees	Disb.	Total	Fees	Disbursements
Worked	329,730.75	329,730.75	0.00	28,433.70	28,433.70	0.00	219,333.60	219,333.60	0.00
Unbilled Adj	0.00	0.00	0.00	0.00	0.00	0.00	3.51	3.51	0.00
Billed	48,092.04	48,092.04	0.00	0.00	0.00	0.00	151,218.99	151,218.99	0.00
Collected	48,092.04	48,092.04	0.00	0.00	0.00	0.00	151,218.99	151,218.99	0.00
AR Write Off	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00
WIP	541,235.31	465,916.50	75,318.81						
Balance									
AR Balance	0.00	0.00	0.00						
Unalloc	0.00								
Payment									
Client Trust	0.00								
Balance									

Billing Address

Krista Freitag, as Receiver for ANI Development, LLC, et al.
E3 Advisors
401 West 'A' Street, Suite 1830
San Diego, CA 92101

EXHIBIT A

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02/10/21 21:57:36 PROFORMA STATEMENT FOR MATTER 378827.00004 (Krista Freitag, as Receiver for ANI Deve) (SEC v. Champion-Cain - Reporting)

Preliminary Billing FormBilling Atty: 001665 - Fates, Edward
(Ted)

Matter #: 378827.00004

Client Name: Krista Freitag, as Receiver for ANI Deve

Date of Last Billing: 12/28/20

Matter Name: SEC v. Champion-Cain - Reporting

Proforma Number: 1076697

Client/Matter Joint Group # 378827-1

Fees for Matter 378827.00004.(SEC v. Champion-Cain - Reporting)

Trans Date	Index	Description of Service Rendered	Timekeeper	Hours	Fees	Sum	Circle	Action	
08/10/20	8171831	Work on Receiver's 4th interim report (1.8) discuss same with Receiver (.3) communications with SEC counsel re: same (.1)	Fates, Edward (Ted)	2.20	1,346.40	1,346.40	WO	HD	TR
08/14/20	8176752	Meet and confer communications with SEC counsel re: Receiver's 4th interim report	Fates, Edward (Ted)	0.20	122.40	1,468.80	WO	HD	TR
08/18/20	8178887	Call/emails with SEC counsel re: 4th interim report and related issues (.5) discuss same with Receiver (.3)	Fates, Edward (Ted)	0.80	489.60	1,958.40	WO	HD	TR
08/19/20	8180021	Revisions/updates to Receiver's 4th interim report and exhibit thereto (.7) discuss same with Receiver (.2)	Fates, Edward (Ted)	0.90	550.80	2,509.20	WO	HD	TR

Proforma Summary**Timekeeper**

Number	Timekeeper	Hours	Rate	Amounts
001665	Fates, Edward (Ted)	4.10	612.00	2,509.20
		4.10		\$2,509.20

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Proforma Summary**Timekeeper**

Number	Timekeeper	Hours	Rate	Amounts
	Subtotal Fees			\$2,509.20
	Discount			0.00
	Total Fees			2,509.20
	Total Disbursements			0.00

Attorney Billing Instructions

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

Billing Instructions

expires 6/30/2021: 10% off standard rates (automatic); no text editing; copies @ .10

Account Summary – As Of 02/10/21

	Fiscal YTD			Calendar YTD			LTD		
	Total	Fees	Disb.	Total	Fees	Disb.	Total	Fees	Disbursements
Worked	7,348.05	7,348.05	0.00	0.00	0.00	0.00	2,509.20	2,509.20	0.00
Unbilled Adj	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00
Billed	9,757.35	9,757.35	0.00	0.00	0.00	0.00	34,657.65	34,657.65	0.00
Collected	9,757.35	9,757.35	0.00	0.00	0.00	0.00	34,657.65	34,657.65	0.00
AR Write Off	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00
WIP	10,733.85	10,733.85	0.00						
Balance									
AR Balance	0.00	0.00	0.00						
Unalloc	0.00								
Payment									
Client Trust	0.00								
Balance									

Billing Address

Krista Freitag, as Receiver for ANI Development, LLC, et al.

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E3 Advisors
401 West 'A' Street, Suite 1830
San Diego, CA 92101

EXHIBIT A

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Preliminary Billing Form

Billing Atty: 001665 - Fates, Edward
(Ted)

Matter #: 378827.00005

Client Name: Krista Freitag, as Receiver for ANI Deve

Date of Last Billing: 12/28/20

Matter Name: SEC v. Champion-Cain - Operations & Asse

Proforma Number: 1076697

Client/Matter Joint Group # 378827-1

Fees for Matter 378827.00005.(SEC v. Champion-Cain - Operations & Asse)

Trans Date	Index	Description of Service Rendered	Timekeeper	Hours	Fees	Sum	Circle Action			
07/01/20	8137383	Work on motion to approve sale of 809 San Rafael property (1.3) discuss same and claims of J. Lance to property with Receiver (.4) communications with J. Lance re: same (.3) communications with Receiver and counsel for Pullman buyer re: further extension of closing and increased to deposit funds, revise proposed amendment re: same (.5)	Fates, Edward (Ted)	2.50	1,530.00	1,530.00	WO	HD	TR	_____
07/01/20	8139064	Coordinate completion of items for closing of LaMesa Surf Rider property.	Lorenzen, Jonathan	0.60	326.70	1,856.70	WO	HD	TR	_____
07/01/20	8139713	Confirm escrow instructions for Surf Rider (1.1); Confirm escrow instructions for Patio Marketplace (1.2).	Klinger, Warren	2.30	1,169.55	3,026.25	WO	HD	TR	_____
07/02/20	8139238	Advise Receiver on issues re: J. Lance claims and 809 San Rafael sale approval motion (.5) communications with J. Lance (.2) revisions to 809 San Rafael sale motion (.4) revisions to equipment purchase and	Fates, Edward (Ted)	2.20	1,346.40	4,372.65	WO	HD	TR	_____

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Fees for Matter 378827.00005.(SEC v. Champion-Cain - Operations & Asse)

Trans Date	Index	Description of Service Rendered	Timekeeper	Hours	Fees	Sum	Circle Action			
		lease termination agreement re: Swell Coffee roasting equipment (.7) discuss same with Receiver (.2) analyze Crown Point sale approval order and advise Receiver re: same (.2)								
07/04/20	8139781	Email re. IRS lien	Kraus, Katherine	0.40	268.20	4,640.85	WO	HD	TR	_____
07/06/20	8139950	Analyze issues re: tax lien on 3415 Mission property	Fates, Edward (Ted)	0.20	122.40	4,763.25	WO	HD	TR	_____
07/07/20	8141612	Review and advise Receiver re: further extension of closing and increase to deposit funds for Pullman sale	Fates, Edward (Ted)	0.30	183.60	4,946.85	WO	HD	TR	_____
07/07/20	8141647	Email re. IRS tax lien.	Kraus, Katherine	0.30	201.15	5,148.00	WO	HD	TR	_____
07/07/20	8164279	Begin drafting the purchase and sale agreement with Daniel Ryan for the sale of the property located and addressed at 3816 Mission Boulevard and 733 Salem Court.	Thiels, Megan	2.30	848.70	5,996.70	WO	HD	TR	_____
07/08/20	8142253	Communications with counsel for Pullman buyer re: execution of amendment to extend closing and increase deposit (.2) work on Receiver declaration in support of 809 San Rafael sale (.9) communications with Receiver and counsel for Champion-Cain re: request for Swell closing statement (.2) work on accounti for costs of sale for Parking Lot property (.3) discuss same and sale of Crown Point personal property with Receiver (.2)	Fates, Edward (Ted)	1.80	1,101.60	7,098.30	WO	HD	TR	_____

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Fees for Matter 378827.00005.(SEC v. Champion-Cain - Operations & Asse)

Trans Date	Index	Description of Service Rendered	Timekeeper	Hours	Fees	Sum	Circle	Action	
07/08/20	8142652	Review and revise Purchase and Sale Agreement for 3816 Mission Blvd.	Lorenzen, Jonathan	0.60	326.70	7,425.00	WO	HD	TR
07/08/20	8164287	Finish drafting, editing and revising the purchase and sale agreement with Daniel Ryan for the property located and addressed at 3816 Mission Boulevard and 733 Salem Court; correspond with client re: such revised purchase and sale agreement.	Thiels, Megan	0.80	295.20	7,720.20	WO	HD	TR
07/09/20	8143001	Finalize Receiver declaration, notice and proposed order for 809 San Rafael sale motion (.7) communications with counsel for Pullman buyer re: execution of closing documents and sale closing (1.3) review closing documents and advise Receiver re: executing of same and closing issues (.7)	Fates, Edward (Ted)	2.70	1,652.40	9,372.60	WO	HD	TR
07/09/20	8143693	Tc with Fates re. tax lien.	Kraus, Katherine	0.30	201.15	9,573.75	WO	HD	TR
07/09/20	8143694	Evaluate issues relating to IRS tax lien	Kraus, Katherine	1.10	737.55	10,311.30	WO	HD	TR
07/09/20	8143890	Review status of Washoe III.	Lorenzen, Jonathan	0.60	326.70	10,638.00	WO	HD	TR
07/10/20	8144438	Communications with Receiver and counsel for Pullman buyer regarding closing issues and further extension of closing	Fates, Edward (Ted)	0.90	550.80	11,188.80	WO	HD	TR
07/10/20	8144576	Revise Purchase and Sale Agreement for Surf Rider Mission Beach.	Lorenzen, Jonathan	1.60	871.20	12,060.00	WO	HD	TR

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Fees for Matter 378827.00005.(SEC v. Champion-Cain - Operations & Asse)

Trans Date	Index	Description of Service Rendered	Timekeeper	Hours	Fees	Sum	Circle	Action	
07/13/20	8145147	Communications with Receiver and counsel for Pullman buyer re: execution of seventh amendment and wire for additional deposit funds (.2) advise Receiver on changes to Keller co-work operations due to latest statewide orders re: COVID-19 pandemic (.2)	Fates, Edward (Ted)	0.40	244.80	12,304.80	WO	HD	TR
07/13/20	8164330	Review and analyze the purchase and sale agreement for 3816 Mission Boulevard executed by Daniel Ryan as Buyer; correspond with the client re: such executed purchase and sale agreement and the information required to finalize such agreement.	Thiels, Megan	0.60	221.40	12,526.20	WO	HD	TR
07/14/20	8146729	Review issues for 3816 Mission Blvd property.	Lorenzen, Jonathan	0.60	326.70	12,852.90	WO	HD	TR
07/15/20	8147068	Communications with G. Rodriguez re: sale of University Ave. property (.2) initial work on motion for approval of same (.7) communications with G. Rodriguez re: Tennyson Street sale and Surf Rider La Mesa sale and lack of qualified overbids (.2) communications with Tennyson buyer re: same (.2) communications with counsel for Pullman buyer re: closing issues (.2) work on notices re: non-receipt of overbids (.4)	Fates, Edward (Ted)	1.90	1,162.80	14,015.70	WO	HD	TR
07/15/20	8147580	Prepare Overbid Purchase and Sale Agreement for University Apartments.	Lorenzen, Jonathan	1.30	707.85	14,723.55	WO	HD	TR
07/15/20	8164354	Continue editing and revising the purchase and sale agreement with Daniel Ryan for the property located and addressed at 3816	Thiels, Megan	0.90	332.10	15,055.65	WO	HD	TR

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Fees for Matter 378827.00005.(SEC v. Champion-Cain - Operations & Asse)

Trans Date	Index	Description of Service Rendered	Timekeeper	Hours	Fees	Sum	Circle	Action	
		Mission Boulevard and 733 Salem Court; modify such agreement to provide for the transfer of personal property by Seller to Buyer.							
07/16/20	8148349	Work on motion for approval of sale of University Ave. property (1.4) discuss motion and issues re: overbid purchase and sale agreement with G. Rodriguez (.3) communications with Receiver and counsel for Pullman buyer re: execution of revised closing documents and wire transfer (.7)	Fates, Edward (Ted)	2.40	1,468.80	16,524.45	WO	HD	TR
07/16/20	8148423	Prepare revised clean and redline versions of the purchase and sale agreement with Daniel Ryan for the property located at 3876 Mission Boulevard; correspond with the client re: such revised draft of the agreement.	Thiels, Megan	0.70	258.30	16,782.75	WO	HD	TR
07/16/20	8148514	Review comments from Buyer for University Apartments property.	Lorenzen, Jonathan	0.50	272.25	17,055.00	WO	HD	TR
07/17/20	8149089	Review Buyer's proposed modifications to University Avenue Purchase and Sale Agreement (0.6); review Buyer's comments to Surfrider Mission Beach Purchase and Sale Agreement, and prepare redraft (0.6); prepare addendum to University Avenue purchase and sale agreement (0.7).	Lorenzen, Jonathan	1.90	1,034.55	18,089.55	WO	HD	TR
07/17/20	8149445	Communication with counsel for Pullman buyer re: wire transfer and closing issues	Fates, Edward (Ted)	0.40	244.80	18,334.35	WO	HD	TR
07/17/20	8149773	Analyze order re: joint motion for use of funds and advise Receiver re: same	Fates, Edward (Ted)	0.20	122.40	18,456.75	WO	HD	TR

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Fees for Matter 378827.00005.(SEC v. Champion-Cain - Operations & Asse)

Trans Date	Index	Description of Service Rendered	Timekeeper	Hours	Fees	Sum	Circle Action			
07/17/20	8164293	review and analyze the version of the purchase and sale agreement executed by Daniel Ryan for the property located and addressed at 3816 Mission Boulevard and 733 Salem Court; correspond with the client re: such executed purchase and sale agreement.	Thiels, Megan	0.60	221.40	18,678.15	WO	HD	TR	_____
07/20/20	8150836	Complete additional revisions to Purchase and Sale Agreement for Surf Rider Mission Beach (0.8); prepare addendum to Purchase and Sale Agreement for University Avenue property (0.9).	Lorenzen, Jonathan	1.70	925.65	19,603.80	WO	HD	TR	_____
07/20/20	8151326	Discuss lease termination issues re: L. Palacios with Receiver and G. Rodriguez	Fates, Edward (Ted)	0.40	244.80	19,848.60	WO	HD	TR	_____
07/20/20	8151581	Prepare powers of attorney re. IRS tax lien	Kraus, Katherine	0.50	335.25	20,183.85	WO	HD	TR	_____
07/21/20	8151912	Advise on lease termination agreement for tenant at Valle Vista property (.4) discuss same with G. Rodriguez (.2)	Fates, Edward (Ted)	0.60	367.20	20,551.05	WO	HD	TR	_____
07/21/20	8152109	Revise Purchase and Sale Agreements for University Avenue property (1.6); review Amendment to Lease for Liza Palacios (0.6); review changes to Purchase and Sale Agreement for Mission Beach Surf Rider (0.5); review Purchase and Sale Agreement for 809 San Rafael (0.4).	Lorenzen, Jonathan	3.10	1,687.95	22,239.00	WO	HD	TR	_____
07/21/20	8152405	Begin drafting, editing and revising the amendment to the lease with Liza Palacios to provide for early termination of the lease;	Thiels, Megan	3.10	1,143.90	23,382.90	WO	HD	TR	_____

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Fees for Matter 378827.00005.(SEC v. Champion-Cain - Operations & Asse)

Trans Date	Index	Description of Service Rendered	Timekeeper	Hours	Fees	Sum	Circle	Action	
		review and analyze the underlying lease documents as necessary; correspond with the client re: such amendment to the lease with Liza Palacios.							
07/21/20	8152628	Prepare powers of attorney re. IRS tax lien.	Kraus, Katherine	1.00	670.50	24,053.40	WO	HD	TR
07/22/20	8152966	Advise Receiver on issues re: MB Surf Rider sale (.2) work on notices re: non-receipt of overbids for 737 Windemere, 3415 Mission and Surf Rider La Mesa (.4) discuss same with Receiver and G. Rodriguez (.2) communications with Receiver and counsel for J. Lance re: potential overbid for 809 San Rafael (.3)	Fates, Edward (Ted)	1.10	673.20	24,726.60	WO	HD	TR
07/22/20	8153288	Prepare Overbid Purchase and Sale Agreement for Mission Beach Surf Rider (0.8): review Overbid Purchase Agreement for 809 San Rafael (0.3).	Lorenzen, Jonathan	1.10	598.95	25,325.55	WO	HD	TR
07/22/20	8153598	Address IRS tax lien issues.	Kraus, Katherine	0.40	268.20	25,593.75	WO	HD	TR
07/23/20	8154198	Review terms of Overbid Purchase and Sale Agreement for 809 San Rafael.	Lorenzen, Jonathan	0.70	381.15	25,974.90	WO	HD	TR
07/24/20	8155410	Discuss revisions to University Ave. sale motion with Receiver (.3) work on same (.4)	Fates, Edward (Ted)	0.70	428.40	26,403.30	WO	HD	TR
07/24/20	8155507	Review proposed lien releases for Santa Fe property and coordinate completion of closing items.	Lorenzen, Jonathan	0.70	381.15	26,784.45	WO	HD	TR

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07/24/20	8156469	Analysis of escrow instructions.	Klinger, Warren	1.00	508.50	27,292.95	WO	HD	TR
07/27/20	8156606	Work on revisions to University Ave. sale motion (.7) discuss same with Receiver (.2) work on release agreements for mechanic's lien holders on University Ave. (.9)	Fates, Edward (Ted)	1.80	1,101.60	28,394.55	WO	HD	TR
07/27/20	8157029	Review Letter of Intent for Ocean Beach Surf Rider and prepare Purchase Agreement.	Lorenzen, Jonathan	0.80	435.60	28,830.15	WO	HD	TR
07/28/20	8157876	Discuss University Ave. sale motion and mechanic's lien releases with Receiver and G. Rodriguez (.3) work on lien release agreement for architect (.6) prepare notice of qualified overbid for 809 San Rafael (.3) discuss same with G. Rodriguez (.1) discuss issues with 809 San Rafael buyer with Receiver (.2) advise Receiver on 809 San Rafael auction procedures (.4) discuss revisions to University Ave. sale motion and Iconik release with Receiver and G. Rodriguez (.3) work on same (.4)	Fates, Edward (Ted)	2.60	1,591.20	30,421.35	WO	HD	TR
07/28/20	8159102	Analysis of escrow instructions.	Klinger, Warren	1.20	610.20	31,031.55	WO	HD	TR
07/29/20	8159524	Work on Receiver declaration and proposed order for University Ave sale motion	Fates, Edward (Ted)	0.80	489.60	31,521.15	WO	HD	TR
07/30/20	8160478	Discuss sale of Mission Beach Surf Rider assets with Receiver and G. Rodriguez (.4) work on sale approval motion (1.7) attend auction for sale of 809 San Rafael property (.4) discuss same, amendment to winning	Fates, Edward (Ted)	3.30	2,019.60	33,540.75	WO	HD	TR

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		bidder purchase and sale agreement, and notice of results of auction with Receiver (.2) work on amendment to purchase and sale agreement and discuss back up bidder issues with Receiver (.6)							
07/30/20	8160662	Complete Purchase and Sale Agreement for Ocean Beach Surf Rider, including preparation of a Management Agreement to permit Buyer to operate the restaurant from the Premises prior to the closing.	Lorenzen, Jonathan	3.60	1,960.20	35,500.95	WO	HD	TR
07/30/20	8165870	Develop strategy re: amending the purchase and sale agreements for the High Bidder and Backup Bidder in the 809 San Rafael transaction; discuss potential changes to the auction provisions of the purchase and sale agreement forms.	Thiels, Megan	0.50	184.50	35,685.45	WO	HD	TR
07/31/20	8161769	Review auction procedures for Purchase and Sale Agreements (0.8); review Overbid Purchase and Sale Agreement for 809 San Rafael (0.9); complete Restaurant Management Agreement and Purchase and Sale Agreement for Surf Rider Ocean Beach (2.1).	Lorenzen, Jonathan	3.80	2,069.10	37,754.55	WO	HD	TR
07/31/20	8161857	Discuss issues re: Symetra loan and potential sale of Lamont property, personal property and liquor license with Receiver	Fates, Edward (Ted)	0.20	122.40	37,876.95	WO	HD	TR
07/31/20	8165988	Begin editing and revising the auction provisions of the form purchase and sale agreement; begin drafting the High Bidder and Backup Bidder amendments to the purchase and sale agreements for the	Thiels, Megan	2.80	1,033.20	38,910.15	WO	HD	TR

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		property located at 809 San Rafael Place.							
08/03/20	8167218	Work on revisions to sale motion for Mission Beach Surf Rider assets (.4) work on Receiver declaration in support of motion and proposed order (.9) work on notice of results of auction and amended proposed order for 809 San Rafael (.7) discuss same with Receiver and G. Rodriguez (.1)	Fates, Edward (Ted)	2.10	1,285.20	40,195.35	WO	HD	TR
08/03/20	8167407	Correspond with the client re: the new purchase and sale agreement with Ramin Karimi for the property located and addressed at 3816 Mission Boulevard and 733 Salem Court; begin drafting such purchase and sale agreement.	Thiels, Megan	1.30	479.70	40,675.05	WO	HD	TR
08/04/20	8167594	Review updated Purchase and Sale Agreement for 3816 Mission Blvd.	Lorenzen, Jonathan	0.20	108.90	40,783.95	WO	HD	TR
08/04/20	8168101	Discuss upcoming hearings on sale motions and telephonic appearance requests with SEC counsel	Fates, Edward (Ted)	0.20	122.40	40,906.35	WO	HD	TR
08/04/20	8192018	Fishing drafting, editing and revising the purchase and sale agreement with Ramin Karimi for the property located at 3816 Mission Boulevard and 733 Salem Court; prepare clean and redline versions of such agreement; correspond with the client re: such draft of the agreement.	Thiels, Megan	0.60	221.40	41,127.75	WO	HD	TR
08/05/20	8168506	Discuss sale of Bella Pacific property and motion to approve sale with G. Rodriguez (.4) initial work on motion (.6) respond to	Fates, Edward (Ted)	2.50	1,530.00	42,657.75	WO	HD	TR

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Trans Date	Index	Description of Service Rendered	Timekeeper	Hours	Fees	Sum	Circle	Action	
		communications from counsel for Tennyson Street buyer (.2) advise on issues re: handling of 809 San Rafael net sale proceeds (.2) address issues re: C. Riharb lien on Windemere property, discuss same with Receiver and G. Rodriguez (.8) discuss former employee claim for unemployment with Receiver and analyze same (.3)							
08/06/20	8169465	Analyze issue regarding unemployment claim and provide argument that claim should be denied as untimely.	Bell, Melissa	0.60	267.30	42,925.05	WO	HD	TR
08/06/20	8169490	Discuss approach to C. Riharb lien issue re: Windemere property with Receiver (.3) work on motion re: sale of Bella Pacific property (.7) analyze tax issues re: PTO payments to former employees (.4) discuss same with Receiver (.3)	Fates, Edward (Ted)	1.70	1,040.40	43,965.45	WO	HD	TR
08/06/20	8170315	TC with Fates re. tax issues	Kraus, Katherine	0.40	268.20	44,233.65	WO	HD	TR
08/07/20	8170594	Advise Receiver re: issues on potential sale of Patio on Lamont personal property and liquor license (.2) follow up with counsel for C. Riharb re: Windemere sale issues (.2) discuss Bella Pacific loan/release price issues with Receiver for sale motion (.1) discuss PTO issue re: C. Torres with Receiver (.2) communications with counsel for C. Torres re: same (.4) revisions to letters to former employees re: PTO payments (.4) revise letters regarding employee life insurance policies (.3) discuss same with Receiver (.2) advise Receiver	Fates, Edward (Ted)	2.30	1,407.60	45,641.25	WO	HD	TR

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08/07/20	8187665	Analysis of trademark assignment for Saska's.	Klinger, Warren	0.50	254.25	45,895.50	WO	HD	TR _____
08/10/20	8172301	Review updated Purchase and Sale Agreement for 3816 Mission.	Lorenzen, Jonathan	0.40	217.80	46,113.30	WO	HD	TR _____
08/10/20	8172617	Attention to Trademark Assignment.	Klinger, Warren	2.00	1,017.00	47,130.30	WO	HD	TR _____
08/10/20	8173144	Communications with G. Rodriguez and counsel for C. Riharb re: issues relating to Windemere property and proposed sale (.8) work on revisions to Bella Pacific sale motion (.6) work on Receiver declaration in support of Bell Pacific sale motion (.7) advise Receiver on Pullman post-closing issue (.2)	Fates, Edward (Ted)	2.30	1,407.60	48,537.90	WO	HD	TR _____
08/10/20	8192181	Begin drafting, editing and revising the purchase and sale agreement with Vining Industrial Park for the property located at 3816 Mission Boulevard and 733 Salem Court.	Thiels, Megan	1.40	516.60	49,054.50	WO	HD	TR _____
08/11/20	8173409	Work on proposed order and notice of motion for Bella Pacific (.2) revisions to Receiver declaration (.3) discuss same with Receiver (.1) analyze Tennyson Street sale order and advise Receiver re: same (.2)	Fates, Edward (Ted)	0.80	489.60	49,544.10	WO	HD	TR _____
08/12/20	8173966	Work on liquor license transfer agreement (1.1) discuss same with Receiver (.2) communications with counsel for	Fates, Edward (Ted)	1.80	1,101.60	50,645.70	WO	HD	TR _____

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		Champion-Cain and Receiver re: Valle Vista sale listing (.3) discuss issues re: employee life insurance policies with Receiver (.2)							
08/13/20	8175104	Communications with counsel for C. Torres re: life insurance policy (.2) analyze order approving 3415 Mission sale free and clear of tax lien and advise Receiver and G. Rodriguez re: same (.2)	Fates, Edward (Ted)	0.40	244.80	50,890.50	WO	HD	TR
08/13/20	8175731	Analysis of escrow instructions.	Klinger, Warren	1.00	508.50	51,399.00	WO	HD	TR
08/14/20	8176549	Analyze Surf Rider La Mesa sale approval order and advise Receiver re: same	Fates, Edward (Ted)	0.20	122.40	51,521.40	WO	HD	TR
08/14/20	8176579	Review and revise Overbid Purchase and Sale Agreement for Mission Beach Surf Rider.	Lorenzen, Jonathan	0.60	326.70	51,848.10	WO	HD	TR
08/14/20	8192314	Begin drafting, editing and revising the overbid purchase and sale agreement with Las Hadas.	Thiels, Megan	1.40	516.60	52,364.70	WO	HD	TR
08/17/20	8177566	Communications with Receiver and counsel for Pullman buyer re: Pullman/JB Resources issues and correspondence re: same (.7) advise Receiver on revisions to liquor license transfer agreement (.4)	Fates, Edward (Ted)	1.10	673.20	53,037.90	WO	HD	TR
08/17/20	8177591	Prepare closing documents for 3415 Mission Blvd.	Lorenzen, Jonathan	0.50	272.25	53,310.15	WO	HD	TR
08/18/20	8179033	Communications with counsel for C. Riharb re: Deed of Trust and sale of Windemere	Fates, Edward (Ted)	0.20	122.40	53,432.55	WO	HD	TR

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08/18/20	8179399	Revise Purchase and Sale Agreement for Surf Rider Ocean Beach.	Lorenzen, Jonathan	0.60	326.70	53,759.25	WO	HD	TR
08/18/20	8180411	Prepare word version of bill of sale.	Klinger, Warren	0.20	101.70	53,860.95	WO	HD	TR
08/20/20	8181161	Analyze and advise Receiver re: revisions to purchase and sale agreement for former Fireside liquor license and execution of same (.5) advise G. Rodriguez on issues re: Windemere sale and C. Riharb Deed of Trust (.4)	Fates, Edward (Ted)	0.90	550.80	54,411.75	WO	HD	TR
08/20/20	8181504	Review and revise Purchase and Sale Agreement for Surf Rider Mission Beach.	Lorenzen, Jonathan	0.60	326.70	54,738.45	WO	HD	TR
08/21/20	8181988	Work on accounting of costs of sale for Saska's and 3415 Mission properties (.6) discuss same with Receiver (.1) follow up communications with counsel for C. Riharb (.2) discuss Windemere sale issues with Receiver (.2) analyze and advise Receiver re: sale approval order (.2) work on motion for amended order approving sale free and clear of C. Riharb lien (1.7) advise on short term rental issue for vacation property (.3)	Fates, Edward (Ted)	3.30	2,019.60	56,758.05	WO	HD	TR
08/21/20	8182532	Draft, edit and revise the new purchase and sale agreement with Shivakumar Balasubramanyam and Muthukumaran Sasirekha for the property located at 3816 Mission Boulevard; correspond with the client re: such purchase and sale agreement	Thiels, Megan	0.90	332.10	57,090.15	WO	HD	TR

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08/24/20	8183345	Work on motion to amend Windemere Court sale approval order to address C. Riharb disputed lien (1.4) discuss same with G. Rodriguez (.2) advise on issues re: potential overbid for University Ave. property (.3)	Fates, Edward (Ted)	1.90	1,162.80	58,252.95	WO	HD	TR	_____
08/24/20	8183698	Prepare Overbid Purchase and Sale Agreement for University Apartments, and review issues related to overbids; coordinate execution.	Lorenzen, Jonathan	1.40	762.30	59,015.25	WO	HD	TR	_____
08/25/20	8184788	Communications with G. Rodriguez re: overbid for University Ave. property and notice of same (.3) discuss concerns with 809 San Rafael sale order and University Ave. auction issues with Receiver (.3)	Fates, Edward (Ted)	0.60	367.20	59,382.45	WO	HD	TR	_____
08/25/20	8184838	Coordinate completion of Purchase and Sale Agreement for Surf Rider Ocean Beach.	Lorenzen, Jonathan	0.60	326.70	59,709.15	WO	HD	TR	_____
08/26/20	8186018	Work on notice of receipt of overbid for University Ave., discuss same with Receiver (.4) discuss issues re: Riharb lien and motion to amend Windemere sale order with Receiver (.2)	Fates, Edward (Ted)	0.60	367.20	60,076.35	WO	HD	TR	_____
08/26/20	8186500	Review overbid information and modifications to Purchase and Sale Agreements for University Apartments property.	Lorenzen, Jonathan	0.80	435.60	60,511.95	WO	HD	TR	_____
08/26/20	8192618	Edit and revise the previously executed overbid purchase and sale agreement for	Thiels, Megan	1.10	405.90	60,917.85	WO	HD	TR	_____

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		the University Apartments property; prepare revised clean, redline and final execution versions of such agreement and slip in the executed signature and initial pages; correspond with the client re: such revised executed draft of the overbid purchase and sale agreement.								
08/27/20	8187183	Review executed Purchase and Sale Agreement for Mission Beach Surf Rider, and prepared updated version for signature.	Lorenzen, Jonathan	0.60	326.70	61,244.55	WO	HD	TR	_____
08/27/20	8187445	Discuss University Avenue auction with Receiver (.2) attend auction (.3) address issues re: purchase and sale agreement amendments for auction winner and back-up bidder (.2) discuss severance agreement for ANI employee with G. Rodriguez (.3) work on revisions to motion to amend Windemere sale order (.4) discuss same with Receiver (.1)	Fates, Edward (Ted)	1.50	918.00	62,162.55	WO	HD	TR	_____
08/28/20	8188311	Call/emails with G. Rodriguez re: severance agreement for ANI property manager (.7) work on Receiver declaration and proposed order amending Windemere sale order (1.4) finalize motion and memorandum of points and authorities (.6) review scheduling order and communications with counsel for C. Riharb re: notice of motion and hearing/briefing schedule (.4)	Fates, Edward (Ted)	3.10	1,897.20	64,059.75	WO	HD	TR	_____
08/28/20	8188527	Review executed version of Purchase and Sale Agreement for Mission Beach Surf Rider (0.5); review updated terms of Purchase and Sale Agreement for 901 -	Lorenzen, Jonathan	3.10	1,687.95	65,747.70	WO	HD	TR	_____

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		915 West Washington Property and prepare Purchase and Sale Agreement (1.7); review correspondence and Purchase and Sale Agreement Amendments for University Avenue Property (0.9).								
08/28/20	8189435	E-mails to/from G. Rodriguez regarding separation from employment . Telephone conference with G. Rodriguez regarding severance agreement. Draft severance agreement and e-mails with G. Rodriguez regarding the same.	Bell, Melissa	1.70	757.35	66,505.05	WO	HD	TR	_____
08/28/20	8192658	Begin drafting the high bidder and backup bidder amendments to the purchase and sale agreements for the University Apartments property; review and analyze the overbid purchase and sale agreement for the Mission Beach Surf Rider property signed by OMG Hospitality; correspond with the client re: such executed overbid purchase and sale agreement.	Thiels, Megan	1.40	516.60	67,021.65	WO	HD	TR	_____
08/31/20	8190868	Review issues related to Mission Beach Surf Rider.	Lorenzen, Jonathan	0.60	326.70	67,348.35	WO	HD	TR	_____
08/31/20	8191196	Discuss revisions to former ANI employee severance agreement with Receiver.	Fates, Edward (Ted)	0.30	183.60	67,531.95	WO	HD	TR	_____
08/31/20	8191759	Review executed version of Purchase and Sale Agreement for 900 - 915 Washington property (0.5); review terms of Purchase and Sale Agreement for Randolph (0.4).	Lorenzen, Jonathan	0.90	490.05	68,022.00	WO	HD	TR	_____
08/31/20	8192664	Prepare the final execution version of the overbid purchase and sale agreement with	Thiels, Megan	0.60	221.40	68,243.40	WO	HD	TR	_____

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		OMG Hospitality for the Mission Beach Surf Rider property; correspond with the client re: such final execution version of the agreement.								
09/01/20	8193790	Work on accounting of costs of sale for Tennyson Street property. (.5) discuss same with Receiver (.2)	Fates, Edward (Ted)	0.70	428.40	68,671.80	WO	HD	TR	_____
09/02/20	8196228	Communications with Receiver re: overbids for MB Surf Rider sale (.3) work on notice re: same (.4) advise Receiver re: MB Surf Rider auction procedures (.3)	Fates, Edward (Ted)	1.00	612.00	69,283.80	WO	HD	TR	_____
09/02/20	8196266	Prepare amendments to Purchase and Sale Agreements for Surf Rider Mission Beach (1.6); review executed amendment for University Avenue Property (0.2); review executed Amendments for Surf Rider Mission Beach (0.6); review terms of sale of Randolph Property (0.5).	Lorenzen, Jonathan	2.90	1,579.05	70,862.85	WO	HD	TR	_____
09/02/20	8216722	Begin drafting the purchase and sale agreement with Louisa and Evan Galbo for the property located at 4030-4034 Randolph Street.	Thiels, Megan	2.70	996.30	71,859.15	WO	HD	TR	_____
09/03/20	8196894	Review and revise Purchase and Sale Agreement for Randolph Property (1.1); review issues for Mission Beach Surf Rider (0.7).	Lorenzen, Jonathan	1.80	980.10	72,839.25	WO	HD	TR	_____
09/03/20	8197017	Attend auction and advise Receiver re: issues with bidding procedures and back-up bidder deposit (.7) address issues re: amendment to overbid purchase and sale	Fates, Edward (Ted)	3.40	2,080.80	74,920.05	WO	HD	TR	_____

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		agreement (.3) analyze order approving sale of 809 San Rafael and advise Receiver re: same (.4) call with counsel for C. Riharb re: motion to amend Windemere sale order, opposition to same, issues relating to disputed lien, and potential settlement (.7) discuss same with Receiver (.5) prepare summary of claims/issues and correspondence laying out same (.8)							
09/03/20	8216723	Continue drafting, editing and revising the purchase and sale agreement with Louisa and Evan Galbo for the property located at 4030 - 4034 Randolph Street; correspond with the client re: such draft of the purchase and sale agreement.	Thiels, Megan	1.10	405.90	75,325.95	WO	HD	TR
09/04/20	8197989	Review issues related to Surf Rider Mission Beach.	Lorenzen, Jonathan	0.60	326.70	75,652.65	WO	HD	TR
09/04/20	8198888	Calls/emails with Receiver and counsel for C. Riharb re: issues relating to disputed lien, potential opposition to motion, and potential resolution of dispute	Fates, Edward (Ted)	1.30	795.60	76,448.25	WO	HD	TR
09/04/20	8216734	Draft the high bidder amendment to the purchase and sale agreement with OMG Hospitality for the Mission Beach Surf Rider property; correspond with the client re: such amendment.	Thiels, Megan	0.90	332.10	76,780.35	WO	HD	TR
09/08/20	8199256	Review executed Purchase and Sale Agreement documents and related correspondence for Mission Beach Surf Rider and University Avenue properties.	Lorenzen, Jonathan	0.50	272.25	77,052.60	WO	HD	TR

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09/08/20	8200270	Work on notice of results of auction and amended proposed order for University Ave sale (.6) work on notice of results of auction and amended proposed order for MB Surf Rider assets (.7) discuss same and lack of overbids for Bella Pacific property with Receiver and G. Rodriguez (.5) work on notice of non-receipt of overbids for Bella Pacific (.2) call with counsel for C. Riharb re: potential resolution of claimed security interest in Windemere and Yarmouth properties to allow for Windemere sale (.5)	Fates, Edward (Ted)	2.20	1,346.40	78,399.00	WO	HD	TR
09/08/20	8216756	Review and analyze the executed Second Amendment to the purchase and sale agreement with OMG Hospitality for the Surf Rider Mission Beach property.	Thiels, Megan	0.20	73.80	78,472.80	WO	HD	TR
09/09/20	8200204	Analyze legal issues raised by counsel for C. Riharb re: disputed deed of trust and potential settlement of same (.9) discuss same with Receiver (.3) revisions to notices of auction results and proposed orders for University Ave. and MB Surf Rider sales (.5)	Fates, Edward (Ted)	1.70	1,040.40	79,513.20	WO	HD	TR
09/09/20	8200372	Review executed version of Purchase and Sale Agreement for 4030 Randolph property(0.3); review Purchase and Sale Agreement for 3816 Mission property (0.6).	Lorenzen, Jonathan	0.90	490.05	80,003.25	WO	HD	TR
09/09/20	8216771	Begin drafting the purchase and sale agreement with Matthew Hepler for the property located at 3816 Mission Boulevard and 733 Salem Court; correspond with the client re: such purchase and sale	Thiels, Megan	1.90	701.10	80,704.35	WO	HD	TR

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Fees for Matter 378827.00005.(SEC v. Champion-Cain - Operations & Asse)

Trans Date	Index	Description of Service Rendered agreement.	Timekeeper	Hours	Fees	Sum	Circle	Action	
09/10/20	8201256	Discuss issues relating C. Riharb disputed lien and Windemere sale with Receiver (.4) communications with counsel for C. Riharb re: potential resolution of disputed lien (.4) discuss same with counsel for SEC (.2) finalize notices re: auction results for University Ave. and MB Surf Rider and related exhibits (.3)	Fates, Edward (Ted)	1.30	795.60	81,499.95	WO	HD	TR
09/11/20	8202680	Call with counsel for C. Riharb re: disputed lien and potential resolution of same (.4) discuss same with Receiver (.2) communications with J. Lance re: closing documents for 809 San Rafael and agreement to set aside funds subject to disputed claims (.4) discuss same with Receiver and G. Rodriguez (.2) analyze issues raised in C. Riharb opposing to motion to amend Windemere sale approval order (.7) address issues re: potential short sale of 3515 Hancock Street property (.2)	Fates, Edward (Ted)	3.10	1,897.20	83,397.15	WO	HD	TR
09/14/20	8203935	Discuss OB Surf Rider asset sale with Receiver and G. Rodriguez (.4) work on sale approval motion (1.4) address UCC lien issues re: OB Surf Rider assets (.4) advise Receiver re: status of pending sale motions per Court's minute order (.2) review order re: video hearing on motion to amend Windemere sale motion, communications with counsel for C. Riharb re: same (.2) advise Receiver re: same (.1) review withdrawal and refiling of limited opposition by C. Riharb (.3)	Fates, Edward (Ted)	3.00	1,836.00	85,233.15	WO	HD	TR

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Fees for Matter 378827.00005.(SEC v. Champion-Cain - Operations & Asse)

Trans Date	Index	Description of Service Rendered	Timekeeper	Hours	Fees	Sum	Circle	Action	
09/14/20	8204714	Review and respond to emails and perform UCC Searches regarding 2163 Abbott Street LP; forward results to Attorney Fates.	Kaup, John	0.40	120.60	85,353.75	WO	HD	TR
09/14/20	8206635	Evaluate filings and follow-up on the sale motion, amended order and dispute with alleged lien claimant/call with counsel.	Zaro, David	0.40	322.20	85,675.95	WO	HD	TR
09/15/20	8204863	Discuss dissolution of certain restaurant entities for tax purposes and potential short sale for Hancock Street property with Receiver (.3) communications with Receiver and counsel for C. Riharb regarding potential resolution of dispute liens (.8) discuss UCC lien on OB Surf Rider assets with Receiver (.2) work on reply brief in support of motion to amend Windemere sale order (1.4)	Fates, Edward (Ted)	2.70	1,652.40	87,328.35	WO	HD	TR
09/16/20	8206061	Discuss revisions to OB Surf Rider motion with Receiver (.5) work on same and declaration in support of motion (.9) work on proposed order and notice of motion (.3) discuss revisions to reply brief re: Windemere sale order with Receiver (.2) work on same (.3) advise G. Rodriguez on issues re: assignment of University Ave. sale contract to related buyer entity and potential joint motion re: same (.4)	Fates, Edward (Ted)	2.60	1,591.20	88,919.55	WO	HD	TR
09/17/20	8207155	Discuss purchase and sale agreement exhibit for OB Surf Rider motion with Receiver, finalize motion (.3) confer with Receiver and G. Rodriguez re: issues relating to C. Riharb liens and potential	Fates, Edward (Ted)	2.20	1,346.40	90,265.95	WO	HD	TR

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Trans Date	Index	Description of Service Rendered	Timekeeper	Hours	Fees	Sum	Circle Action			
		settlement (.4) finalize reply brief in support of motion to amend Windemere sale order (.4) multiple calls/emails with Receiver and counsel for C. Riharb re: potential settlement terms (1.1)								
09/18/20	8207874	Communications with Receiver and Court chambers re: attendance at video hearing on 9/21 (.2) communications with Receiver and counsel for C. Riharb regarding resolution of disputed liens (.5) review withdrawal of limited opposition and order taking 9/21 hearing off calendar and advise Receiver regarding same (.2)	Fates, Edward (Ted)	0.90	550.80	90,816.75	WO	HD	TR	_____
09/21/20	8209329	Review Lease for Mission Beach Parking Lot, and prepare Termination Agreement.	Lorenzen, Jonathan	1.60	871.20	91,687.95	WO	HD	TR	_____
09/21/20	8211158	Advise Receiver and G. Rodriguez re: briefing schedule for OB Surf Rider and deadline to file further sale motions for 10/26 hearing date (.1) discuss status re: sale efforts on Valle Vista property with Receiver (.2) work on accounting of costs of sale for 809 San Rafael, discuss same with Receiver (.4) advise Receiver and G. Rodriguez on issues re: ownership of Valle Vista property and related issues for sale motion and title insurance (.4)	Fates, Edward (Ted)	1.10	673.20	92,361.15	WO	HD	TR	_____
09/22/20	8211020	Advise G. Rodriguez re: issues with prospective buyer for Yarmouth Court property	Fates, Edward (Ted)	0.30	183.60	92,544.75	WO	HD	TR	_____
09/23/20	8212256	Review updated information from Landlord regarding Mission Beach Parking Lot	Lorenzen, Jonathan	0.30	163.35	92,708.10	WO	HD	TR	_____

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Trans Date	Index	Description of Service Rendered	Timekeeper	Hours	Fees	Sum	Circle	Action	
		Lease, and revise Termination Agreement accordingly.							
09/25/20	8214311	Analyze order amending Windemere sale order and advise Receiver and G. Rodriguez re: same (.2) discuss issues with Jacmar UCC lien on OB Surf Rider assets with Receiver (.2) communications with counsel for Jacmar re: same (.3)	Fates, Edward (Ted)	0.70	428.40	93,136.50	WO	HD	TR _____
09/25/20	8214357	Revise Purchase and Sale Agreement Form regarding auction timing.	Lorenzen, Jonathan	0.30	163.35	93,299.85	WO	HD	TR _____
09/28/20	8216341	Discuss title issues for Windemere sale and removal of C. Riharb lien with G. Rodriguez	Fates, Edward (Ted)	0.40	244.80	93,544.65	WO	HD	TR _____
09/28/20	8216347	Review changes to Purchase and Sale Agreement for 4030 Randolph Street, and prepare Amendment.	Lorenzen, Jonathan	0.80	435.60	93,980.25	WO	HD	TR _____
09/29/20	8217340	Communications with G. Rodriguez and counsel for C. Riharb re: Windemere title and sale closing issues	Fates, Edward (Ted)	0.50	306.00	94,286.25	WO	HD	TR _____
09/29/20	8217412	Review Lease documents to confirm Option Terms; prepare Amendment to Lease for Surf Rider Ocean Beach property.	Lorenzen, Jonathan	1.10	598.95	94,885.20	WO	HD	TR _____
09/29/20	8217611	Discuss timing re: move out of Hancock Street office building with Receiver	Fates, Edward (Ted)	0.20	122.40	95,007.60	WO	HD	TR _____
09/30/20	8219871	Review proposed Listing Agreement for 901 Washington property.	Lorenzen, Jonathan	0.50	272.25	95,279.85	WO	HD	TR _____

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Trans Date	Index	Description of Service Rendered	Timekeeper	Hours	Fees	Sum	Circle	Action
09/30/20	8222244	Analyze information for Randolph Street sale from G. Rodriguez (.4) communications with G. Rodriguez re: same (.5) work on Randolph Street sale motion (1.7) discuss issues re: C. Torres life insurance policy with Receiver (.2) communications with counsel for C. Riharb re: execution of reconveyance of Deed of Trust on 737 Windemere (.3) discuss Randolph Street publication and auction timing issues with G. Rodriguez (.2) communications with counsel for Champion-Cain re: tax notice relating to 2163 Abbott Street (.2) discuss same with Receiver (.1)	Fates, Edward (Ted)	3.60	2,203.20	97,483.05	WO	HD TR

Proforma Summary

Timekeeper

Number	Timekeeper	Hours	Rate	Amounts
000313	Zaro, David	0.40	805.50	322.20
000820	Kaup, John	0.40	301.50	120.60
001665	Fates, Edward (Ted)	88.10	612.00	53,917.20
002115	Lorenzen, Jonathan	45.40	544.50	24,720.30
002244	Bell, Melissa	2.30	445.50	1,024.65
002283	Klinger, Warren	8.20	508.50	4,169.70
002306	Thiels, Megan	27.80	369.00	10,258.20
002372	Kraus, Katherine	4.40	670.50	2,950.20
		177.00		\$97,483.05
Subtotal Fees				\$97,483.05
Discount				0.00
Total Fees				97,483.05
Total Disbursements				0.00

Attorney Billing Instructions

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

Billing Instructions

expires 6/30/2021: 10% off standard rates (automatic); no text editing; copies @ .10

Account Summary – As Of 02/10/21

	Fiscal YTD			Calendar YTD			LTD		
	Total	Fees	Disb.	Total	Fees	Disb.	Total	Fees	Disbursements
Worked	160,932.15	160,932.15	0.00	8,780.85	8,780.85	0.00	97,483.05	97,483.05	0.00
Unbilled Adj	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00
Billed	178,726.50	178,726.50	0.00	0.00	0.00	0.00	434,785.05	434,785.05	0.00
Collected	178,726.50	178,726.50	0.00	0.00	0.00	0.00	434,785.05	434,785.05	0.00
AR Write Off	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00
WIP	251,688.90	251,658.90	30.00						
Balance									
AR Balance	0.00	0.00	0.00						
Unalloc	0.00								
Payment									
Client Trust	0.00								
Balance									

Billing Address

Krista Freitag, as Receiver for ANI Development, LLC, et al.
 E3 Advisors
 401 West 'A' Street, Suite 1830
 San Diego, CA 92101

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Preliminary Billing Form

Billing Atty: 001665 - Fates, Edward
(Ted)

Matter #: 378827.00006

Client Name: Krista Freitag, as Receiver for ANI Deve

Date of Last Billing: 12/28/20

Matter Name: SEC v. Champion-Cain - Claims & Distribu

Proforma Number: 1076697

Client/Matter Joint Group # 378827-1

Fees for Matter 378827.00006.(SEC v. Champion-Cain - Claims & Distribu)

Trans Date	Index	Description of Service Rendered	Timekeeper	Hours	Fees	Sum	Circle	Action	
07/01/20	8137390	Discuss direct investor inquiries re: claims against CTC with Receiver	Fates, Edward (Ted)	0.20	122.40	122.40	WO	HD	TR
07/01/20	8141087	Review emails and follow-up on 6/24 email concerning the D Street claimants, TriCorp and SFG response, forced place insurance coverage.	Zaro, David	0.40	322.20	444.60	WO	HD	TR
07/02/20	8139437	Advise Receiver re: approach to pre-receivership IRS tax claim and associated lien, discuss same with tax counsel	Fates, Edward (Ted)	0.60	367.20	811.80	WO	HD	TR
07/06/20	8143428	Evaluate the draft of the TriCorp stipulation and complaint against the lender, Seattle Funding Group (.4). Email concerning the SFG claims and approach, call concerning Settle Funding (.3)	Zaro, David	0.70	563.85	1,375.65	WO	HD	TR
07/07/20	8141048	Communications with counsel for SFG and SEC counsel re: joint motion regarding loan secured by W. Washington property (.3) advise on issues re: federal tax lien (.2)	Fates, Edward (Ted)	1.40	856.80	2,232.45	WO	HD	TR

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Fees for Matter 378827.00006.(SEC v. Champion-Cain - Claims & Distribu)

Trans Date	Index	Description of Service Rendered	Timekeeper	Hours	Fees	Sum	Circle	Action	
		communications with Receiver and counsel for First Choice re: loans secured by Bandini and 10th and J properties (.9)							
07/07/20	8143514	Review/evaluate the complaint from TriCorp, the proposed stipulation for relief from stay and exhibits, revise stipulation as to the project at D Street/TriCorp's subliens (.6). Email regarding D Street/TriCorp stipulation (.3). Call with Receiver regarding D Street stipulation and revisions to same (.5).	Zaro, David	1.40	1,127.70	3,360.15	WO	HD	TR
07/08/20	8142251	Communications with Receiver and counsel for First Choice Bank re: loan secured by 10th and J property	Fates, Edward (Ted)	0.50	306.00	3,666.15	WO	HD	TR
07/08/20	8144414	Revise draft of stipulation, emails with Receiver and counsel for TriCorp (.6). Call with Receiver concerning TriCorp stipulation/Seattle Funding DIL agreement and stipulation (.4). Emails to Receiver and counsel for TriCorp related to insurance and the stipulation (.6). Further emails/revisions to draft of the stipulation to include Seattle Funding Group and review of loan terms/documents (1.3).	Zaro, David	2.90	2,335.95	6,002.10	WO	HD	TR
07/09/20	8143533	Advise on issues re: IRS tax lien on Fireside by the Patio	Fates, Edward (Ted)	0.30	183.60	6,185.70	WO	HD	TR
07/09/20	8144532	Email with client and follow-up on D Street claims/insurance (.2). Revisions to draft stipulation, email and call with Receiver related to claimant coordination and further revisions (.7).	Zaro, David	0.90	724.95	6,910.65	WO	HD	TR

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Trans Date	Index	Description of Service Rendered	Timekeeper	Hours	Fees	Sum	Circle Action			
07/10/20	8144013	Discuss issues re: tax lien on Fireside and approach to same with Receiver (.3) analyze order denying investor motions to intervene and advise Receiver re: same (.4)	Fates, Edward (Ted)	0.70	428.40	7,339.05	WO	HD	TR	_____
07/10/20	8147631	Revise/finalize proposed stipulation for limited relief from Preliminary Injunction for lender SFG and lien claimants (.4). Emails to/from counsel for Tri-Corp and SFG related to stipulation (.5).	Zaro, David	0.90	724.95	8,064.00	WO	HD	TR	_____
07/13/20	8145153	Communications with counsel for First Choice re: joint motion regarding loan secured by 10th and J property (.1) discuss issues re: SFG loan on W. Washington property with Receiver (.2) communications with counsel for First Choice and counsel for SEC re: Bandini issues (.4) advise on issues re: joint motion concerning 301 D Street property (.2)	Fates, Edward (Ted)	0.90	550.80	8,614.80	WO	HD	TR	_____
07/13/20	8147657	Email with Mr. Perrott, follow-up to address proposed revisions to stipulation (.4). Call with counsel related to the claims regarding "D" Street (.3).	Zaro, David	0.70	563.85	9,178.65	WO	HD	TR	_____
07/14/20	8146508	Communications with counsel for First Choice Bank re: draft joint motion re: loan secured by 10th and J property	Fates, Edward (Ted)	0.20	122.40	9,301.05	WO	HD	TR	_____
07/14/20	8148239	Email/revisions to draft of the TriCorp/Seattle Funding Group claim (.4). Follow-up emails with SGH/TriCorp counsel and follow-up on the draft stipulation (.4).	Zaro, David	0.80	644.40	9,945.45	WO	HD	TR	_____

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Trans Date	Index	Description of Service Rendered	Timekeeper	Hours	Fees	Sum	Circle	Action	
07/15/20	8148760	Call/email concerning the SFG comments to draft stipulation (.2). Several emails/review and evaluate the revision from SFG (.6).	Zaro, David	0.80	644.40	10,589.85	WO	HD	TR
07/16/20	8148225	Communications with Receiver and counsel for First Choice Bank re: issues with 10th and J Street property	Fates, Edward (Ted)	0.40	244.80	10,834.65	WO	HD	TR
07/16/20	8150949	Work on emails, revise draft of the joint stipulation concerning "D" Street (.8). Follow-up on the emails concerning the joint stipulation and additional changes (.3).	Zaro, David	1.10	886.05	11,720.70	WO	HD	TR
07/17/20	8152974	Further revisions to the draft of the stipulation , Receiver/SEC to address creditor claimant relief from the Preliminary Injunction Order, several emails related to stipulation with counsel.	Zaro, David	0.80	644.40	12,365.10	WO	HD	TR
07/20/20	8151134	Advise Receiver re: responses to unique investor inquiries (.2) discuss issues re: First Choice loan secured by 10th and J and SFG loan secured by W. Washington property with Receiver (.5) discuss IRS lien on Fireside and POA for same with Receiver (.4)	Fates, Edward (Ted)	1.10	673.20	13,038.30	WO	HD	TR
07/20/20	8153347	Follow-up on emails concerning the stipulation related to "D" Street, additional revisions and call with Receiver concerning stipulation/claims.	Zaro, David	0.40	322.20	13,360.50	WO	HD	TR
07/21/20	8151785	Advise Receiver on SFG proposed notice to tenants at W. Washington re: future rent payments (.3) communications with counsel	Fates, Edward (Ted)	1.50	918.00	14,278.50	WO	HD	TR

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Trans Date	Index	Description of Service Rendered	Timekeeper	Hours	Fees	Sum	Circle Action			
		for SFG re: same (.1) work on joint motion re: relief from injunction for First Choice foreclosure on 10 & J property (.7) discuss same with Receiver (.2) communications with counsel for First Choice re: joint motion (.2)								
07/21/20	8154490	Work on revisions to the draft stipulation from SFC and TriCorp (.6). Several emails and conference with counsel related to the claims/stipulation (.3). Several emails/revisions to finalize stipulation following further emails with counsel for FG/TriCorp and Receiver (1.1)	Zaro, David	2.00	1,611.00	15,889.50	WO	HD	TR	_____
07/22/20	8153126	Communications with counsel for First Choice Bank, counsel for SEC, and counsel for Champion-Cain re: joint motion fro relief from injunction re: 10th and J property (.4) respond to direct inquiry from investor (.3) address issues re: IRS tax claims, tax lien, and power of attorney forms (.6)	Fates, Edward (Ted)	1.30	795.60	16,685.10	WO	HD	TR	_____
07/22/20	8158718	Emails to counsel for SFG concerning the stipulation (.2). Work on the final version of the joint stipulation and exhibit, follow emails regarding the stipulation (.5).	Zaro, David	0.70	563.85	17,248.95	WO	HD	TR	_____
07/23/20	8154205	Advise Receiver re: website postings related to Champion-Cain and C. Torres criminal cases (.3) communications with counsel for CalPrivate Bank re: claim of security interest in bank account (.3)	Fates, Edward (Ted)	0.60	367.20	17,616.15	WO	HD	TR	_____
07/24/20	8155340	Advise Receiver re: mechanic's lien claims as to University Ave. property (.3) discuss	Fates, Edward (Ted)	0.70	428.40	18,044.55	WO	HD	TR	_____

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Trans Date	Index	Description of Service Rendered	Timekeeper	Hours	Fees	Sum	Circle	Action	
		approach to IRS lien claim as to Fireside by the Patio with Receiver (.2) initial work on on letter to IRS re: same (.2)							
07/27/20	8157110	Meet and confer communications re: joint motion concerning First Choice Bank loan on 10th and J Street property	Fates, Edward (Ted)	0.20	122.40	18,166.95	WO	HD	TR
07/27/20	8160905	Wok/emails related to "D" Street claimants stipulation, finalize same following SEC/Defendant approval.	Zaro, David	0.60	483.30	18,650.25	WO	HD	TR
07/28/20	8157862	Communications with counsel for First Choice Bank re: joint motion	Fates, Edward (Ted)	0.10	61.20	18,711.45	WO	HD	TR
07/28/20	8160951	Emails concerning the joint stipulation, follow-up regarding SFG and TriCorp (.4) Review/revise draft order approving the joint stipulation for limited relief (.3).	Zaro, David	0.70	563.85	19,275.30	WO	HD	TR
07/29/20	8159832	Revisions to letter to IRS re: tax claim/lien as to Fireside and 3415 Mission property	Fates, Edward (Ted)	0.40	244.80	19,520.10	WO	HD	TR
07/30/20	8160587	Communications with counsel for First Choice Bank re: proposed order for joint motion	Fates, Edward (Ted)	0.10	61.20	19,581.30	WO	HD	TR
07/31/20	8161550	Review notices received from Sonoma County Superior Court re: action filed by Adam Lewis Construction, investigate status of same (.4) communications with counsel for Adam Lewis Construction re: same (.3)	Fates, Edward (Ted)	0.70	428.40	20,009.70	WO	HD	TR
07/31/20	8166122	Follow-up on call and email related to the 140 Keller Street property and interest of	Zaro, David	0.40	322.20	20,331.90	WO	HD	TR

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Fees for Matter 378827.00006.(SEC v. Champion-Cain - Claims & Distribu)

Trans Date	Index	Description of Service Rendered claimant (.4).	Timekeeper	Hours	Fees	Sum	Circle Action			
08/03/20	8168946	Call regarding Lewis Company lien claim with counsel and asses issues (.2). Follow-up review of email/call with Receiver and counsel as to Lewis/SFG claims (.2). Evaluate claim/order concerning Lewis and SFG, assess claim lien rights, and priority claims of A. Lewis (.9).	Zaro, David	1.30	1,047.15	21,379.05	WO	HD	TR	_____
08/04/20	8168129	Review order re: First Choice Bank joint motion and advise Receiver re: same	Fates, Edward (Ted)	0.20	122.40	21,501.45	WO	HD	TR	_____
08/07/20	8170503	Communications with counsel for First Choice Bank and Receiver re: recording of notice of default as to 10th and J Street property	Fates, Edward (Ted)	0.20	122.40	21,623.85	WO	HD	TR	_____
08/12/20	8174242	Review complaint in superior court lawsuit filed by creditor (.3) discuss same with Receiver (.2) communications with counsel for creditor re: litigation stay (.2)	Fates, Edward (Ted)	0.70	428.40	22,052.25	WO	HD	TR	_____
08/13/20	8177758	Email/call and follow-up on the motion concerning "D" Street.	Zaro, David	0.40	322.20	22,374.45	WO	HD	TR	_____
08/17/20	8177542	Communications with counsel for creditor re: state court action against ANI and litigation stay (.3) advise Receiver re: same (.1)	Fates, Edward (Ted)	0.40	244.80	22,619.25	WO	HD	TR	_____
08/17/20	8180165	Follow-up on the notices of default related to the SFG loans and emails concerning the foreclosure sale timing (.3). Address status of the "D" Street foreclosure/stipulation for relief from injunction (.3).	Zaro, David	0.60	483.30	23,102.55	WO	HD	TR	_____

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Fees for Matter 378827.00006.(SEC v. Champion-Cain - Claims & Distribu)

Trans Date	Index	Description of Service Rendered	Timekeeper	Hours	Fees	Sum	Circle Action			
08/18/20	8179010	Analyze and advise Receiver re: Notice of default recorded by SFG (.2) communications with A. Herren re: vendor claim asserted by CDW (.2)	Fates, Edward (Ted)	0.40	244.80	23,347.35	WO	HD	TR	_____
08/21/20	8185912	Several emails, assess the claims of TriCorp and SFG, follow-up with SFG counsel.	Zaro, David	0.40	322.20	23,669.55	WO	HD	TR	_____
08/24/20	8185522	Teleconference with counsel regarding potential claims against R. Houts and various subpoenas (.5); voicemail to S. Metzger regarding insurance coverage and follow-up email regarding the same (.2).	Aspis, Norman	0.70	311.85	23,981.40	WO	HD	TR	_____
08/26/20	8188759	Conference and email with TriCorp counsel regarding "D" Street motion for relief from the injunction.	Zaro, David	0.20	161.10	24,142.50	WO	HD	TR	_____
08/27/20	8187443	Discuss responses to investor inquiries with Receiver	Fates, Edward (Ted)	0.20	122.40	24,264.90	WO	HD	TR	_____
08/28/20	8188576	Advise Receiver on content for update to claimants via receivership website (.2) advise Receiver regarding responses to unique investor inquiries (.2)	Fates, Edward (Ted)	0.40	244.80	24,509.70	WO	HD	TR	_____
08/31/20	8190551	Advise Receiver and L. Ryan re: responses to former employees for PTO-related claims (.3) communications with Receiver and USAO re: inquiries from investors relating to criminal cases (.2)	Fates, Edward (Ted)	0.50	306.00	24,815.70	WO	HD	TR	_____
09/03/20	8197331	Call with counsel for Champion-Cain re: action in Colorado state court by Rodman	Fates, Edward (Ted)	0.60	367.20	25,182.90	WO	HD	TR	_____

02/10/21 21:57:39 PROFORMA STATEMENT FOR MATTER 378827.00006 (Krisa Freitag, as Receiver for ANI Deve) (SEC v. Champion-Cain - Claims & Distribu)

EXHIBIT A

Fees for Matter 378827.00006.(SEC v. Champion-Cain - Claims & Distribu)

Trans Date	Index	Description of Service Rendered	Timekeeper	Hours	Fees	Sum	Circle	Action	
		Law Group for unpaid fees (.4) analyze issues re: Rodman Law Group claims against ANI (.2)							
09/04/20	8197778	Call/emails with Receiver re: claims asserted by Rodman Law Group, strategy and research re: same (.8) call from investor re: claims against CTC, CTC settlement issues, clawback claims, and related issues (.7)	Fates, Edward (Ted)	1.50	918.00	26,100.90	WO	HD	TR
09/08/20	8199344	Communications with W. Caldarelli re: amounts received by settling investors under CTC settlement and impact of payments on investor claim amounts	Fates, Edward (Ted)	0.30	183.60	26,284.50	WO	HD	TR
09/09/20	8200652	Communications with Receiver re: issues with claims asserted by Rodman Law Group	Fates, Edward (Ted)	0.20	122.40	26,406.90	WO	HD	TR
09/09/20	8201651	Emails with counsel for Tricor and Receiver related to "D" Street/lien claims (.4). Call with counsel and review docket related to stipulation for relief from injunction (.2).	Zaro, David	0.60	483.30	26,890.20	WO	HD	TR
09/10/20	8202810	Evaluate emails/documents, extension of credit regarding "D" Street and emails with counsel for "D" Street and Receiver.	Zaro, David	0.60	483.30	27,373.50	WO	HD	TR
09/18/20	8209395	Review and forward notices of default for 10th and J property.	Kaup, John	0.20	60.30	27,433.80	WO	HD	TR
09/21/20	8209564	Work on joint motion to approve settlement of C. Riharb disputed liens (1.4) discuss same with Receiver (.2) communications with J. Lance and Receiver re: J. Lance	Fates, Edward (Ted)	1.80	1,101.60	28,535.40	WO	HD	TR

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EXHIBIT A

Fees for Matter 378827.00006.(SEC v. Champion-Cain - Claims & Distribu)

Trans Date	Index	Description of Service Rendered	Timekeeper	Hours	Fees	Sum	Circle Action			
		request for financial info related to 809 San Rafael (.2)								
09/21/20	8210731	Review of duplicate notices of default for 10th and J property.	Kaup, John	0.10	30.15	28,565.55	WO	HD	TR	_____
09/22/20	8210839	Revisions to joint motion re: C. Riharb settlement (.4) communications with counsel for C. Riharb re: same (.3) analyze C. Riharb revisions to joint motion and discuss same with Receiver (.5)	Fates, Edward (Ted)	1.20	734.40	29,299.95	WO	HD	TR	_____
09/23/20	8212132	Discuss final revisions to joint motion with Receiver and counsel for C. Riharb	Fates, Edward (Ted)	0.40	244.80	29,544.75	WO	HD	TR	_____
09/24/20	8213691	Analyze revisions to joint motion from counsel for C. Riharb (.3) communications with counsel for C. Rihard re: same (.4)	Fates, Edward (Ted)	0.70	428.40	29,973.15	WO	HD	TR	_____
09/25/20	8216041	Communications with counsel for C. Rihard re: revisions to draft joint motion for approval of settlement (.4) discuss same with Receiver (.3) communications with counsel for Champion-Cain re: claims asserted by Rodman Law Group and related issues (.5)	Fates, Edward (Ted)	1.20	734.40	30,707.55	WO	HD	TR	_____
09/28/20	8217641	Work on joint motion re: settlement with C. Riharb (.2) communications with counsel for C. Riharb re: same (.2) communications with SEC counsel and counsel for Champion-Cain re: same (.2) discuss issues re: Hancock property and ANICO loan with Receiver (.2) communications with ANICO counsel re: foreclosure issues (.3)	Fates, Edward (Ted)	1.10	673.20	31,380.75	WO	HD	TR	_____

02/10/21 21:57:39 PROFORMA STATEMENT FOR MATTER 378827.00006 (SEC v. Champion-Cain - Claims & Distribu) **EXHIBIT A**

Fees for Matter 378827.00006.(SEC v. Champion-Cain - Claims & Distribu)

Trans Date	Index	Description of Service Rendered	Timekeeper	Hours	Fees	Sum	Circle	Action
09/30/20	8219101	Communications with counsel for SEC and counsel for C. Riharb re: joint motion re: settlement of disputed liens (.3) finalize joint motion (.2) discuss issues relating to J. Lance claims to 809 San Rafael property with Receiver (.2)	Fates, Edward (Ted)	0.70	428.40	31,809.15	WO	HD TR

Proforma Summary

Timekeeper Number	Timekeeper	Hours	Rate	Amounts
000313	Zaro, David	20.30	805.50	16,351.65
000820	Kaup, John	0.30	301.50	90.45
001665	Fates, Edward (Ted)	24.60	612.00	15,055.20
002369	Aspis, Norman	0.70	445.50	311.85
		45.90		\$31,809.15
Subtotal Fees				\$31,809.15
Discount				0.00
Total Fees				31,809.15
Total Disbursements				0.00

Attorney Billing Instructions

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

Billing Instructions

expires 6/30/2021: 10% off standard rates (automatic); no text editing; copies @ .10

Account Summary – As Of 02/10/21

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

02/10/21 21:57:39 PROFORMA STATEMENT FOR MATTER 378827.00000 (Krista Freitag, as Receiver for ANI Deve) (SEC v. Champion-Cain - Claims & Distribu)

EXHIBIT A

Worked	50,241.15	50,241.15	0.00	3,070.35	3,070.35	0.00	31,809.15	31,809.15	0.00
Unbilled Adj	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00
Billed	80,365.50	80,365.50	0.00	0.00	0.00	0.00	187,944.75	187,944.75	0.00
Collected	80,365.50	80,365.50	0.00	0.00	0.00	0.00	187,944.75	187,944.75	0.00
AR Write Off	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00

	Total	Fees	Costs
WIP	109,263.45	109,263.15	0.30
Balance			
AR Balance	0.00	0.00	0.00
Unalloc	0.00		
Payment			
Client Trust	0.00		
Balance			

Billing Address

Krista Freitag, as Receiver for ANI Development, LLC, et al.
 E3 Advisors
 401 West 'A' Street, Suite 1830
 San Diego, CA 92101

EXHIBIT A

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02/10/21 21:57:43 PROFORMA STATEMENT FOR MATTER 378827.00008 (Krista Freitag, as Receiver for ANI Deve) (SEC v. Champion-Cain - Pending Litigatio)

Preliminary Billing Form

Billing Atty: 001665 - Fates, Edward
(Ted)

Matter #: 378827.00008

Client Name: Krista Freitag, as Receiver for ANI Deve

Date of Last Billing: 12/28/20

Matter Name: SEC v. Champion-Cain - Pending Litigatio

Proforma Number: 1076697

Client/Matter Joint Group # 378827-1

Fees for Matter 378827.00008.(SEC v. Champion-Cain - Pending Litigatio)

Trans Date	Index	Description of Service Rendered	Timekeeper	Hours	Fees	Sum	Circle Action			
07/07/20	8141082	Call/emails with local counsel in FL re: issues and strategy for SunTrust litigation	Fates, Edward (Ted)	0.70	428.40	428.40	WO	HD	TR	_____
07/23/20	8154207	Communications with local counsel in FL re: upcoming deposition of key witness in SunTrust matter	Fates, Edward (Ted)	0.30	183.60	612.00	WO	HD	TR	_____
08/05/20	8168527	Address issues re: fees for banking expert in SunTrust case, communications with local counsel in FL re: same	Fates, Edward (Ted)	0.20	122.40	734.40	WO	HD	TR	_____
08/07/20	8170418	Communications with local counsel in FL and Receiver re: banking expert fees	Fates, Edward (Ted)	0.20	122.40	856.80	WO	HD	TR	_____
09/03/20	8197323	Communications with counsel for plaintiff in pending Luu action in SD Superior Court re: stipulation to continue case management conference	Fates, Edward (Ted)	0.40	244.80	1,101.60	WO	HD	TR	_____
09/04/20	8197779	Discuss status and strategy re: pending SunTrust action with local counsel in FL	Fates, Edward (Ted)	0.60	367.20	1,468.80	WO	HD	TR	_____

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EXHIBIT A

Fees for Matter 378827.00008.(SEC v. Champion-Cain - Pending Litigation)

Trans Date	Index	Description of Service Rendered	Timekeeper	Hours	Fees	Sum	Circle Action			
09/10/20	8201147	Communications with counsel for plaintiff in pending Luu action re: status report and request to continue CMC	Fates, Edward (Ted)	0.20	122.40	1,591.20	WO	HD	TR	_____
09/24/20	8213528	Analyze order denying SunTrust motion for summary judgment (.2) communications with local counsel in FL re: same and next steps (.4)	Fates, Edward (Ted)	0.60	367.20	1,958.40	WO	HD	TR	_____

Proforma Summary

Timekeeper Number	Timekeeper	Hours	Rate	Amounts
001665	Fates, Edward (Ted)	3.20	612.00	1,958.40
		3.20		\$1,958.40
Subtotal Fees				\$1,958.40
Discount				0.00
Total Fees				1,958.40
Total Disbursements				0.00

Attorney Billing Instructions

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

Billing Instructions

expires 6/30/2021: 10% off standard rates (automatic); no text editing; copies @ .10

Account Summary – As Of 02/10/21

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

02/10/21 21:57:43 PROFORMA STATEMENT FOR MATTER 378827.00008 (Krista Freitag, as Receiver for ANI Deve) (SEC v. Champion-Cain - Pending Litigatio)

EXHIBIT A

Worked	3,866.85	3,866.85	0.00	990.45	990.45	0.00	1,958.40	1,958.40	0.00
Unbilled Adj	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00
Billed	11,851.65	11,851.65	0.00	0.00	0.00	0.00	24,994.80	24,994.80	0.00
Collected	11,851.65	11,851.65	0.00	0.00	0.00	0.00	24,994.80	24,994.80	0.00
AR Write Off	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00
	Total	Fees	Costs						
WIP	7,191.90	7,191.90	0.00						
Balance									
AR Balance	0.00	0.00	0.00						
Unalloc	0.00								
Payment									
Client Trust	0.00								
Balance									

Billing Address

Krista Freitag, as Receiver for ANI Development, LLC, et al.
E3 Advisors
401 West 'A' Street, Suite 1830
San Diego, CA 92101

EXHIBIT A

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02/10/21 21:57:44 PROFORMA STATEMENT FOR MATTER 378827.00009 (Krista Freitag, as Receiver for ANI Deve) (SEC v. Champion-Cain - Employment/Fees)

Preliminary Billing Form

Billing Atty: 001665 - Fates, Edward
(Ted)

Matter #: 378827.00009

Client Name: Krista Freitag, as Receiver for ANI Deve

Date of Last Billing: 12/28/20

Matter Name: SEC v. Champion-Cain - Employment/Fees

Proforma Number: 1076697

Client/Matter Joint Group # 378827-1

Fees for Matter 378827.00009.(SEC v. Champion-Cain - Employment/Fees)

Trans Date	Index	Description of Service Rendered	Timekeeper	Hours	Fees	Sum	Circle Action			
08/03/20	8167199	Revisions to Receiver's second interim fee application	Fates, Edward (Ted)	0.90	550.80	550.80	WO	HD	TR	_____
08/04/20	8167672	Revise notice of association of conflicts counsel and discuss same with Receiver (.6) discuss same with SEC counsel (.1) discuss revisions to Receiver's 2nd interim fee application with Receiver (.3) meet and confer communications with SEC counsel re: same (.2)	Fates, Edward (Ted)	1.30	795.60	1,346.40	WO	HD	TR	_____
08/05/20	8168992	Meet and confer with SEC counsel re: 2nd interim fee applications	Fates, Edward (Ted)	0.20	122.40	1,468.80	WO	HD	TR	_____
08/07/20	8170643	Meet and confer communications with SEC counsel (.1) call with court chambers re: hearing date for 2nd interim fee applications (.1) finalize notice and proposed order for Receiver's fee application (.2) discuss same with Receiver (.2)	Fates, Edward (Ted)	0.60	367.20	1,836.00	WO	HD	TR	_____

02/10/21 21:57:44 PROFORMA STATEMENT FOR MATTER 378827.000000 (Krisa Freitag, as Receiver for ANI Deve) (SEC v. Champion-Cain - Employment/Fees)

EXHIBIT A

Proforma Summary

Timekeeper

Number	Timekeeper	Hours	Rate	Amounts
001665	Fates, Edward (Ted)	3.00	612.00	1,836.00
		3.00		\$1,836.00
Subtotal Fees				\$1,836.00
Discount				0.00
Total Fees				1,836.00
Total Disbursements				0.00

Attorney Billing Instructions

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

Billing Instructions

expires 6/30/2021: 10% off standard rates (automatic); no text editing; copies @ .10

Account Summary – As Of 02/10/21

	Fiscal YTD			Calendar YTD			LTD		
	Total	Fees	Disb.	Total	Fees	Disb.	Total	Fees	Disbursements
Worked	2,815.20	2,815.20	0.00	979.20	979.20	0.00	1,836.00	1,836.00	0.00
Unbilled Adj	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00
Billed	2,732.40	2,732.40	0.00	0.00	0.00	0.00	2,732.40	2,732.40	0.00
Collected	2,732.40	2,732.40	0.00	0.00	0.00	0.00	2,732.40	2,732.40	0.00
AR Write Off	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00
WIP	2,815.20	2,815.20	0.00						
Balance									
AR Balance	0.00	0.00	0.00						
Unalloc	0.00								
Payment									
Client Trust	0.00								
Balance									