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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

**FIFTH 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: November 22, 2021
Time: 11:30 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 Fifth Interim Application for Payment of Fees and Reimbursement of
 6 Expenses (the "Application"). This Application covers the period from October 1,
 7 2020 through December 31, 2020 (the "Application Period"), and seeks approval of
 8 \$326,367.90 in fees and \$52,619.81 in expenses, and an order authorizing the
 9 Receiver to pay, on an interim basis, 80% of the fees incurred (\$261,094.32) and
 10 100% of the expenses incurred (\$52,619.81).

11 **I. INTRODUCTION.**

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

20 The Appointment Order confers broad duties, responsibilities, and powers
 21 upon the Receiver, which are designed to allow her to secure, preserve, and protect
 22 the assets of the Receivership Entities, conduct a forensic accounting and analysis of
 23 the Receivership Entities' financial transactions, investigate and recover sums
 24 transferred to third parties, review and analyze investor and creditor claims, and
 25 maximize the amount ultimately available for distribution to investors and creditors.
 26 The Receiver determined that experienced and qualified counsel was critical to the
 27 performance of her duties and obligations under the Appointment Order due to the
 28 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 ("Sixth Report") filed on March 12, 2021 (Dkt. 619), which describes in detail the Receiver's activities during the Application Period.

This Application seeks approval of \$326,367.90 in fees for a total of 543.10 hours worked, and payment on an interim basis of 80% of that amount, or \$261,094.32. 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	3.70	\$2,264.40
Asset Investigation & Recovery	138.9	\$76,576.95
Reporting	9.60	\$6,552.45
Operations & Asset Sales	101.40	\$54,668.25
Claims & Distributions	24.10	\$15,584.40
Third Party Recoveries	190.10	\$125,932.05
Pending Litigation	1.80	\$1,159.65
General Clawback Claims & Settlements	25.20	\$16,080.30
Claims Against Kim Peterson	48.30	\$27,549.45
Total Fees	543.10	\$326,367.90

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.

1 The three largest categories of work – Asset Investigation & Recovery,
 2 Operations & Asset Sales and Third Party Recoveries – reflects the Receiver's focus
 3 on investigating, recovering, analyzing, and selling receivership assets through
 4 Court-approved sales of real and personal property. The firm has also assisted the
 5 Receiver in investigating and analyzing claims to recover sums from third parties
 6 and in obtaining documents from and producing documents to Chicago Title,
 7 investors/lenders, and other interested parties in an efficient manner. Throughout
 8 this period, Allen Matkins worked with a myriad of third parties seeking
 9 receivership records. Through a cooperative dialogue and Court-approved
 10 document repository, Allen Matkins has helped the Receiver avoid costly and time-
 11 consuming discovery disputes.

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

16 **II. SUMMARY OF TASKS PERFORMED AND COSTS INCURRED.**

17 **A. Categories and Descriptions of Work.**

18 **1. General Receivership.**

19 Allen Matkins' work in this category relates to the related criminal case,
 20 including communications with the United States Attorney's Office and counsel for
 21 Gina Champion-Cain ("GCC") regarding sentencing and restitution issues. The firm
 22 also communicated with counsel for the Commission and counsel for GCC
 23 regarding a bifurcated settlement of the claims against GCC in this action. The
 24 reasonable and necessary fees for Allen Matkins' work in this category total
 25 \$2,264.40.

26 **2. Asset Investigation & Recovery.**

27 The substantial services in this category relate generally to efforts to identify,
 28 secure, preserve, investigate and recover receivership assets. The overriding goals

1 of this work have been to identify and marshal receivership assets and investigate
 2 the foundation for claims in order to recover assets and pursue claims against third
 3 parties; all in an effort to maximize the distributions to victims of the scheme. The
 4 tasks performed include the following:

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

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

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

28

1 Although significant time was spent to establish the ANI document
2 repository, as well as to meet and confer with the interested parties, this work
3 already has (and will continue to) save the receivership estate significant costs of
4 having to respond to numerous individual document requests involving hundreds of
5 thousands of documents and electronic records in the various litigation matters
6 arising from the ANI Ponzi scheme.

7 Allen Matkins also assisted the Receiver in addressing the various issues
8 associated with the property owned by Defendant Gina Champion-Cain and her
9 husband Steven Cain located at 4014 Bandini Street, including secured debts on the
10 property and the receivership estate's claims to recover ANI funds used for the down
11 payment and to pay down prior loans on the property. These issues were ultimately
12 resolved via the Joint Motion filed on November 9, 2020, and order approving it
13 (Dkt. 499, 506.), pursuant to which the receivership estate has recovered
14 \$1.3 million.

15 Allen Matkins also assisted the Receiver in recovering shares of stock in
16 Endeavor Bank, which shares had been purchased with ANI funds and were held by
17 GCC. The shares were recovered and the Receiver is in the process of working with
18 a licensed broker to sell them.

19 Finally, Allen Matkins has assisted the Receiver in analyzing the receivership
20 estate's rights and interests under certain insurance policies, including preparing a
21 claim against ANI's crime/theft insurance policy based on the guilty pleas entered
22 by Defendant Gina Champion-Cain and former ANI employee Cris Torres in the
23 related criminal cases. The reasonable and necessary fees for Allen Matkins' work
24 in this category total \$76,576.95.

25 3. Reporting.

26 Allen Matkins' services in this category include assisting in preparing the
27 Receiver's Preliminary Investor-Specific Accounting Report, which was filed on
28 December 1, 2020. Dkt. 516-1. The firm also assisted in preparing the Receiver's

1 Fifth Interim Report and Recommendations, which was filed on August 19, 2020.
 2 Dkt. 430. The 18-page report includes a detailed summary of the Receiver's
 3 activities, funds recovered, real and personal property assets, restaurant and retail
 4 operations, property taxes, insurance, debt service, loans and other investments,
 5 investigation of third party claims, pending litigation, and other matters. The report
 6 also details the receipts and disbursements for the receivership estate since the
 7 Receiver's appointment and provides her recommendations for the continued
 8 administration of the receivership. The reasonable and necessary fees for Allen
 9 Matkins' work in this category total \$6,552.45.

10 4. Operations & Asset Sales.

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

- 17 • Drafting purchase and sale agreements, commercial and residential
 18 leases and lease amendments, where necessary and appropriate, for
 19 various receivership businesses and properties, as well as handling
 20 related title, loan, and contract issues;
- 21 • Analyzing and assisting with restaurant closures, liquor license issues,
 22 UCC lien issues, and related issues;
- 23 • Attending to issues in connection with the maintenance of existing
 24 trademarks, and abandonment of certain other unused trademarks,
 25 relating to the Receivership Entities' various businesses;
- 26 • Addressing issues of employment law for the Receivership Entities,
 27 including employee terminations, unpaid PTO, WARN Act issues,
 28 health insurance and COBRA issues, and independent contractor

1 agreements in connection with businesses operations and the wind
2 down thereof;

- 3 • Advising and assisting with responses to media inquiries regarding the
4 receivership, restaurant operations, restaurant closures, and related
5 matters;
- 6 • Assisting with closing documents for real property sales, and with
7 escrow agreements and related documents relating to sales of liquor
8 licenses associated with closed restaurants;
- 9 • Assisting with lease issues pertaining to certain tenants for residential
10 properties;
- 11 • Preparing motions, declarations, proposed orders, and notices regarding
12 non-receipt of overbids (as applicable) for Court approval of sales of
13 the following: the Randolph Street property, 7940 University Ave.
14 property, 812 San Rafael property, Valle Vista property, Yarmouth
15 Court property, Camino Degrazia property, 3792 Mission Blvd.
16 property, and West Washington property; and
- 17 • Advising on issues related to COVID-19 pandemic and Safer-At-Home
18 Orders, including required modifications to business operations and
19 notices to remaining ANI employees.

20 The reasonable and necessary fees for Allen Matkins' work in this category
21 total \$54,668.25.

22 5. Claims & Distributions.

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

1 Allen Matkins assisted the Receiver in addressing the claims and mechanic's
 2 liens asserted by the lender, the City of West Sacramento, the general contractor and
 3 various subcontractors, respectively, associated with the partially constructed
 4 apartment building located at 301 D Street in West Sacramento. The firm also
 5 assisted in analyzing and addressing issues with various liens and claims asserted by
 6 vendors, contractors, government agencies and former employees, including tax
 7 claims and wage claims.

8 Allen Matkins also assisted in addressing claims, complaints, mechanic's liens
 9 and/or other security interests asserted by various investors/lenders and creditors,
 10 including James Lance, American Express, Adam Lewis Construction, Futuritech,
 11 Charles Riharb, and others. The reasonable and necessary fees for Allen Matkins'
 12 work in this category total \$15,584.40.

13 6. Third Party Recoveries.

14 This portion of the Application pertains to work on potential claims against
 15 third parties to recover amounts for the benefit of the receivership estate. Due to the
 16 confidential nature of the legal work on these matters and the Receiver's litigation
 17 strategy vis-à-vis third parties, the Receiver has filed a motion concurrently herewith
 18 to file this portion of the Application under seal. The reasonable and necessary fees
 19 for Allen Matkins' work in this category total \$125,932.05.

20 7. Pending Litigation.

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

Allen Matkins also assisted with issues relating to the action pending in San Diego Superior Court known as *Luu v. The Patio Restaurant Grp., LLC, et al.*, San Diego Super. Ct. Case No. 37-2019-00015451-CU-OE-CTL, which is a putative class action filed by a former employee (which action is now stayed pursuant to the litigation stay in the Appointment Order). The reasonable and necessary fees for Allen Matkins' work in this category total \$1,159.65.

8. General Clawback Claims & Settlements.

This portion of the Application pertains to work on potential clawback claims and settlements against third parties to recover amounts for the benefit of the receivership estate. Due to the confidential nature of the legal work on these matters and the Receiver's litigation strategy vis-à-vis third parties, the Receiver has filed a motion concurrently herewith to file this portion of the Application under seal. The reasonable and necessary fees for Allen Matkins' work in this category total \$16,080.30.

9. Claims Against Kim Peterson.

This portion of the Application pertains to work on potential claims against Kim Peterson to recover amounts for the benefit of the receivership estate. Due to the confidential nature of the legal work on these matters and the Receiver's litigation strategy vis-à-vis third parties, the Receiver has filed a motion concurrently herewith to file this portion of the Application under seal. The reasonable and necessary fees for Allen Matkins' work in this category total \$27,549.45.

A. Summary of Expenses Requested for Reimbursement.

Allen Matkins requests that the Court approve reimbursement of \$52,619.81 in out-of-pocket costs. The itemization of such expenses is summarized below by billing category. The majority of the expenses incurred relate to the processing, labeling, and production of approximately five terabytes of documents that were produced in phases/batches as part of the ANI document repository. These e-

discovery vendor costs were approved in connection with the establishment of the repository and the costs were shared amongst the receivership estate, CTC, and the investor groups.

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

Category	Total
Mediation Fees	\$2,750.00
Transcript Fees	\$6,532.90
Messenger/FedEx Fees	\$307.28
Service of Process	\$1,080.65
Court/Filing Fees	\$300.40
Duplication	\$114.70
Postage	\$143.59
PACER/Document Research	\$573.25
E-Discovery	\$40,817.04
Total	\$52,619.81

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

1 skill measured by conservative business standards, the degree of activity, integrity
 2 and dispatch with which the work is conducted and the result obtained." *United*
 3 *States v. Code Prods. Corp.*, 362 F. 2d 669, 673 (3d Cir. 1966) (internal quotation
 4 marks omitted). In practical terms, receiver and professional compensation thus
 5 ultimately rests upon the result of an equitable, multi-factor balancing test involving
 6 the "economy of administration, the burden that the estate may be able to bear, the
 7 amount of time required, although not necessarily expended, and the overall value of
 8 the services to the estate." *In re Imperial 400 Nat'l, Inc.*, 432 F.2d 232, 237 (3d Cir.
 9 1970). Regardless of how this balancing test is formulated, no single factor is
 10 determinative and "a reasonable fee is based [upon] all circumstances surrounding
 11 the receivership." *SEC v. W.L. Moody & Co., Bankers (Unincorporated)*, 374 F.
 12 Supp. 465, 480 (S.D. Tex. 1974).

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

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

26 Allen Matkins has submitted a detailed fee application which describes the
 27 nature of the services rendered. *See* **Exhibit A**. Allen Matkins has endeavored to
 28 staff matters as efficiently as possible while remaining cognizant of the complexity

1 of issues presented. As noted above, the request for fees is based on Allen Matkins'
 2 customary billing rates charged for comparable services provided in other matters,
 3 less a 10% discount. Moreover, Allen Matkins wrote off and did not charge for
 4 6.40 hours of work (\$3,866.85 in fees).

5 The work performed by Allen Matkins was essential to carrying out the
 6 Receiver's Court-ordered duties. The Receiver and Allen Matkins have worked
 7 diligently since the Receiver's appointment to preserve and protect the assets of the
 8 receivership estate, maximize the funds available for ultimate distribution to
 9 victims, and carry out the Receiver's other duties pursuant to the Appointment
 10 Order. Moreover, Allen Matkins seeks payment of only 80% of fees incurred on an
 11 interim basis in recognition of the fact that its work in assisting the Receiver is
 12 ongoing. Payment of the proposed 20% holdback will be sought at the conclusion
 13 of the receivership. Allen Matkins' fees are fair and reasonable and should be
 14 approved and paid on an interim basis.

15 **III. CONCLUSION.**

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

- 17 1. Approving Allen Matkins' fees of \$326,367.90;
- 18 2. Authorizing and directing the Receiver to pay 80% of approved fees, or
 19 \$261,094.32, from the assets of the Receivership Entities;
- 20 3. Approving Allen Matkins' costs in the amount of \$52,619.81, and
 21 authorizing and directing the Receiver to reimburse such costs in full; and
- 22 4. For such other and further relief as the Court deems appropriate.

23 Dated: October 13, 2021

ALLEN MATKINS LECK GAMBLE
 MALLORY & NATSIS LLP

25 By: s/Edward G. Fates

26 DAVID R. ZARO
 EDWARD G. FATES
 27 NORMAN M. ASPIS
 Attorneys for Receiver
 28 KRISTA FREITAG

EXHIBIT INDEX

EXHIBIT NO.	DESCRIPTION	PAGE NO.
Exhibit A	Detailed Descriptions of Services Rendered	17

EXHIBIT A

EXHIBIT A

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10/04/21 15:29:47 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: 1117633

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	
10/07/20	8228303	Review and advise Receiver re: status/timing of Champion-Cain criminal sentencing	Fates, Edward (Ted)	0.20	122.40	122.40	WO	HD	TR
12/08/20	8287080	Call/emails with Receiver and SEC counsel re: accounting issues related to potential bifurcated settlement with Champion-Cain (.7) call from probation office re: pre-sentence report for Champion-Cain sentencing (.3) communications with Receiver and AUSA re: accounting report (.2)	Fates, Edward (Ted)	1.20	734.40	856.80	WO	HD	TR
12/10/20	8289868	Advise Receiver re: issues with inquiry from counsel for Champion-Cain re: issues relating to potential bifurcated settlement with SEC	Fates, Edward (Ted)	0.30	183.60	1,040.40	WO	HD	TR
12/14/20	8292591	Call with AUSA regarding issues relating to forensic accounting, Champion-Cain criminal sentencing, and restitution	Fates, Edward (Ted)	1.10	673.20	1,713.60	WO	HD	TR

10/04/21 15:29:47 PROFORMA STATEMENT FOR MATTER 378827.00002 (Krista Freitag, as Receiver for ANI Deve) (SEC v. Champion-Cain - General Receivers)

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

Trans Date	Index	Description of Service Rendered	Timekeeper	Hours	Fees	Sum	Circle	Action	
12/16/20	8294913	Communications with AUSA re: forensic accounting information relevant to criminal sentencing (.3) communications with Receiver and counsel for SEC re: forensic accounting data related to bifurcated settlement (.3)	Fates, Edward (Ted)	0.60	367.20	2,080.80	WO	HD	TR _____
12/31/20	8306888	Communications with Receiver and AUSA regarding 1/19 sentencing hearing in related criminal case (.2) communications with counsel for Champion-Cain regarding same (.1)	Fates, Edward (Ted)	0.30	183.60	2,264.40	WO	HD	TR _____

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

Trans Date	Index	Type	Quantity	Amt	Circle	Action	
10/01/20	2735448	EDISC – CS Disco, Inc. - Monthly Hosting for October 2020	0.00	2,262.64	WO	HD	TR _____
10/02/20	2671694	MEDIT – Judicate West - Mediation on 11/11/2020	0.00	2,750.00	WO	HD	TR _____
10/05/20	2670027	BW – Duplication - Black & White Copies	449.00	44.90	WO	HD	TR _____
10/05/20	2670028	COLOR – Duplication - Color Copies	1.00	0.10	WO	HD	TR _____
10/05/20	2670824	MSNGR – Federal Express - Ship To: Hiscox Claims	0.00	41.39	WO	HD	TR _____
10/05/20	2677121	PST – -Simona Peng,BOX ALL PARCEL CENTER-Shipped hard drives containing document productions.	0.00	135.57	WO	HD	TR _____
10/07/20	2672734	EDISC – CS Disco - Monthly Hosting for October 2020	0.00	4,369.51	WO	HD	TR _____
10/08/20	2672735	EDISC – CS Disco, Inc. - Monthly Hosting for July 2020	0.00	2,781.96	WO	HD	TR _____
10/08/20	2673293	EDISC – CS Disco, Inc. - Monthly Hosting for September 2020	0.00	4,571.13	WO	HD	TR _____

10/04/21 15:29:47 PROFORMA STATEMENT FOR MATTER 378827.00002 (Krista Freitag, as Receiver for ANI Deve) (SEC v. Champion-Cain - General Receivers)

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

Trans Date	Index	Type	Quantity	Amt					
10/08/20	2673297	EDISC – CS Disco, Inc. - Monthly Hosting for August 2020	0.00	4,160.90	WO	HD	TR	_____	
10/19/20	2673209	MSNGR – Federal Express - Ship To: Ms Karen Hagen	0.00	12.98	WO	HD	TR	_____	
10/19/20	2678031	DCSRCH – Document Research - First Legal Network, LLC - Allen Matkins - San Diego; ORDER GRANTING REQ TO APPROVE SALE OF 7565-7571 UNIVERSI; Advance \$34.00	0.00	124.75	WO	HD	TR	_____	
10/22/20	2677122	PST – -Simona Peng,BOX ALL PARCEL CENTER-Shipped hard drive containing document productions.	0.00	8.02	WO	HD	TR	_____	
10/23/20	2678036	DCSRCH – Document Research - First Legal Network, LLC - Allen Matkins - San Diego; ORDER GRANTING JOINT MOTION FOR APPROVAL OF SETTLEMENT O; Advance \$11.00	0.00	46.75	WO	HD	TR	_____	
10/26/20	2674607	MSNGR – Federal Express - Ship To: Stefany Twamley	0.00	12.98	WO	HD	TR	_____	
10/26/20	2675659	COURT – -San Diego Superior Court,Obtain copies of Notice of Entry of Dismissal from Court's docket.	0.00	15.00	WO	HD	TR	_____	
10/30/20	2675657	COURT – -San Diego Superior Court,Obtain copy of Complaint from Court's website	0.00	8.55	WO	HD	TR	_____	
10/30/20	2677287	DEPO – Veritext, LLC - Deposition Transcript of William A. Adams, Esq. Taken 10/22/2020	0.00	2,940.90	WO	HD	TR	_____	
10/30/20	2678041	MSNGR – Messenger - First Legal Network, LLC - USDC-SAN DIEGO; NOTICE OF MOTION	0.00	52.75	WO	HD	TR	_____	
10/30/20	2678042	DCSRCH – Document Research - First Legal Network, LLC - Allen Matkins - San Diego; ORDER GRANTING RECEIVER'S MOTION TO AMEND ORDER; Advance \$11.00	0.00	83.75	WO	HD	TR	_____	
10/30/20	2678043	MSNGR – Messenger - First Legal Network, LLC - PREFERRED CHOICE ESCROW; ORDER GRANTING RECEIVER'S MOTION TO AMEND ORDER	0.00	19.62	WO	HD	TR	_____	
10/30/20	2689083	EDISC – CS Disco, Inc. - Monthly Hosting for September 2020 (prorated 23 of 30 days)	0.00	2,215.74	WO	HD	TR	_____	
10/30/20	2735451	EDISC – CS Disco, Inc. - Monthly Hosting for October 2020	0.00	7,681.24	WO	HD	TR	_____	

10/04/21 15:29:47 PROFORMA STATEMENT FOR MATTER 378827.00002 (Krista Freitag, as Receiver for ANI Deve) (SEC v. Champion-Cain - General Receivers)

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

Trans Date	Index	Type	Quantity	Amt				
11/01/20	2678326	EDISC – CS Disco, Inc. - Monthly Hosting for November 2020	0.00	2,791.43	WO	HD	TR	_____
11/01/20	2685519	DCSRCH – Document Research - First Legal Network, LLC, Allen Matkins - San Diego; ORDER GRANTING RECEIVER'S MOTION FOR APPROVAL OF SALE OF; Advance \$16.00	0.00	54.00	WO	HD	TR	_____
11/01/20	2688273	RSRCH – Legal Research - Courthouse News Service - San Diego County Superior Court, Ovation Finance Holdings 2 LLC; Ovation Fund Management II LLC; Banc of California NA v. Chicago Title Insurance Company; Chicago Title Company	0.00	10.00	WO	HD	TR	_____
11/01/20	2735454	EDISC – CS Disco, Inc. - Monthly Hosting for November 2020	0.00	4,450.81	WO	HD	TR	_____
11/02/20	2676425	MSNGR – Federal Express - Ship To: Tracey Huntington	0.00	12.98	WO	HD	TR	_____
11/02/20	2679954	DCSRCH – First Legal Network, LLC - USDC-San Diego, Obtain a certified copy of order granting received	0.00	54.00	WO	HD	TR	_____
11/03/20	2678451	POS – 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	54.30	WO	HD	TR	_____
11/03/20	2678452	POS – Nationwide Legal, LLC - Northern Trust Company of California - c/o CT Corporation, SUBPOENA TO PRODUCE DOCUMENTS, INFORMATION, OR OBJECTS OR TO PERMIT INSPECTION OF PREMISES IN A CIVIL ACTION	0.00	54.30	WO	HD	TR	_____
11/03/20	2678461	POS – Nationwide Legal, LLC - The Charles Schwab Corporation, SUBPOENA TO PRODUCE DOCUMENTS, INFORMATION, OR OBJECTS OR TO PERMIT INSPECTION OF PREMISES IN A CIVIL ACTION	0.00	108.30	WO	HD	TR	_____
11/03/20	2678462	POS – Nationwide Legal, LLC - Wells Fargo Bank, SUBPOENA TO PRODUCE DOCUMENTS, INFORMATION, OR OBJECTS OR TO PERMIT INSPECTION OF PREMISES IN A CIVIL ACTION	0.00	168.30	WO	HD	TR	_____
11/06/20	2677424	COURT – -San Diego Superior Court, Obtain copy of 11/3/2020 Minute Order from Court's docket.	0.00	7.50	WO	HD	TR	_____

10/04/21 15:29:47 PROFORMA STATEMENT FOR MATTER 378827.00002 (Krista Freitag, as Receiver for ANI Deve) (SEC v. Champion-Cain - General Receivers)

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

Trans Date	Index	Type	Quantity	Amt				
11/09/20	2676128	BW – Duplication - Black & White Copies	19.00	1.90	WO	HD	TR	_____
11/16/20	2677428	COURT – -San Diego Superior Court,Obtain copies of complaints from Court dockets.	0.00	29.35	WO	HD	TR	_____
11/17/20	2676774	BW – Duplication - Black & White Copies	575.00	57.50	WO	HD	TR	_____
11/17/20	2676775	COLOR – Duplication - Color Copies	3.00	0.30	WO	HD	TR	_____
11/17/20	2685522	MSNGR – Messenger - First Legal Network, LLC, Corinthian Title & Escrow;	0.00	11.99	WO	HD	TR	_____
11/25/20	2677961	COLOR – Duplication - Color Copies	1.00	0.10	WO	HD	TR	_____
11/25/20	2681501	MSNGR – Federal Express - Ship To: Tracey Huntington	0.00	13.01	WO	HD	TR	_____
11/25/20	2685525	DCSRCH – Document Research - First Legal Network, LLC, Allen Matkins - San Diego; ORDER DOC# 511; Advance \$14.00	0.00	52.00	WO	HD	TR	_____
12/01/20	2684559	EDISC – CS Disco, Inc. - Monthly Hosting for December 2020	0.00	2,252.28	WO	HD	TR	_____
12/01/20	2735457	EDISC – CS Disco, Inc. - Project & Data Management Fees for November 2020	0.00	3,279.40	WO	HD	TR	_____
12/02/20	2680991	BW – Duplication - Black & White Copies	14.00	1.40	WO	HD	TR	_____
12/02/20	2684238	POS – Nationwide Legal, LLC - MUFG Union Bank, N.A., SUBPOENA TO PRODUCE DOCUMENTS, INFORMATION, OR OBJECTS OR TO PERMIT INSPECTION OF PREMISES IN A CIVIL ACTION	0.00	188.30	WO	HD	TR	_____
12/03/20	2684055	RECORD – First Legal Network, LLC - Gina Champion-Cain, Notary Service	0.00	112.50	WO	HD	TR	_____
12/08/20	2682126	MSNGR – Federal Express - Ship To: HISCOX CLAIMS	0.00	32.22	WO	HD	TR	_____
12/09/20	2681652	COLOR – Duplication - Color Copies	6.00	0.60	WO	HD	TR	_____

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

Trans Date	Index	Type	Quantity	Amt				
12/09/20	2684251	POS – Nationwide Legal, LLC - JPMorgan Chase Bank, N.A., SUBPOENA TO PRODUCE DOCUMENTS, INFORMATION, OR OBJECTS OR TO PERMIT INSPECTION OF PREMISES IN A CIVIL ACTION	0.00	130.55	WO	HD	TR	_____
12/09/20	2684252	POS – 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	188.30	WO	HD	TR	_____
12/09/20	2684253	POS – Nationwide Legal, LLC - Banc of California, N.A. , SUBPOENA TO PRODUCE DOCUMENTS, INFORMATION, OR OBJECTS OR TO PERMIT INSPECTION OF PREMISES IN A CIVIL ACTION	0.00	188.30	WO	HD	TR	_____
12/10/20	2681810	BW – Duplication - Black & White Copies	61.00	6.10	WO	HD	TR	_____
12/10/20	2681951	DEPO – Veritext, LLC - Deposition Transcript of Michael Brewer Taken 11/24/2020	0.00	1,353.00	WO	HD	TR	_____
12/10/20	2684058	MSNGR – First Legal Network, LLC - Endeavor Bank; DELIVER COURTESY	0.00	11.00	WO	HD	TR	_____
12/10/20	2684059	DCSRCH – First Legal Network, LLC - USDC- San Diego; ORDER GRANTING RECEIVER'S MOTION FOR APPROVAL OF SALE	0.00	42.00	WO	HD	TR	_____
12/11/20	2683144	MSNGR – Federal Express - Ship To: Tracey Huntington	0.00	13.06	WO	HD	TR	_____
12/11/20	2684060	DCSRCH – First Legal Network, LLC - USDC-San Diego; GRANTING RECEIVERS MOTION	0.00	52.00	WO	HD	TR	_____
12/14/20	2682179	COLOR – Duplication - Color Copies	1.00	0.10	WO	HD	TR	_____
12/14/20	2682182	COLOR – Duplication - Color Copies	2.00	0.20	WO	HD	TR	_____
12/14/20	2684061	DCSRCH – First Legal Network, LLC - USDC-San Diego; ORDER GRANTING RECEIVER'S MOTION FOR APPROVAL OF SALE	0.00	54.00	WO	HD	TR	_____
12/14/20	2684062	RECORD – First Legal Network, LLC - Gina Champion-Cain; Notary Service	0.00	112.50	WO	HD	TR	_____

10/04/21 15:29:47 PROFORMA STATEMENT FOR MATTER 378827.00002 (Krista Freitag, as Receiver for ANI Deve) (SEC v. Champion-Cain - General Receivers)

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

Trans Date	Index	Type	Quantity	Amt	WO	HD	TR	
12/15/20	2683197	MSNGR – Federal Express - Ship To: Ms Karen Hagen	0.00	13.08	WO	HD	TR	_____
12/18/20	2682477	BW – Duplication - Black & White Copies	1.00	0.10	WO	HD	TR	_____
12/18/20	2682478	COLOR – Duplication - Color Copies	2.00	0.20	WO	HD	TR	_____
12/19/20	2683531	DEPO – Veritext, LLC - Deposition Transcript of Thomas Schwiebert Taken 12/16/2020	0.00	2,239.00	WO	HD	TR	_____
12/23/20	2688659	MSNGR – Document Research - First Legal Network, LLC, - San Diego ORDER GRANTING RECEIVER'S MOTION FOR APPROVAL OF SALE Advance \$16.00	0.00	34.00	WO	HD	TR	_____
12/24/20	2689524	COURT – -San Diego Superior Court,Obtain copy of Minute Order and Notice from Court's docket.	0.00	15.00	WO	HD	TR	_____
12/28/20	2686502	MSNGR – Federal Express - Ship To: Tracey Huntington	0.00	13.11	WO	HD	TR	_____
12/30/20	2685239	BW – Duplication - Black & White Copies	12.00	1.20	WO	HD	TR	_____
12/30/20	2687736	MSNGR – Federal Express - Ship To: Scott Metzger	0.00	13.11	WO	HD	TR	_____

Proforma Summary

Timekeeper

Number	Timekeeper	Hours	Rate	Amounts
001665	Fates, Edward (Ted)	3.70	612.00	2,264.40
		3.70		\$2,264.40
Subtotal Fees				\$2,264.40
Discount				0.00
Total Fees				2,264.40
Total Disbursements				52,619.81

Attorney Billing Instructions

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

10/04/21 15:29:47 PROFORMA STATEMENT FOR MATTER 378827.00002 (Krista Freitag, as Receiver for ANI Deve) (SEC v. Champion-Cain - General Receivers)

Billing Instructions

expires 6/30/2022: 10% off standard rates (automatic); no text editing; copies @ .10

Account Summary – As Of 10/04/21

	Fiscal YTD			Calendar YTD			LTD		
	Total	Fees	Disb.	Total	Fees	Disb.	Total	Fees	Disbursements
Worked	1,014.80	643.50	371.30	6,151.50	6,151.50	0.00	136,877.10	64,415.25	72,461.85
Unbilled Adj	0.00	0.00	0.00	0.00	0.00	0.00	232.19	0.45	231.74
Billed	0.00	0.00	0.00	0.00	0.00	0.00	53,015.40	53,015.40	19,842.04
Collected	0.00	0.00	0.00	0.00	0.00	0.00	72,857.44	53,015.40	19,842.04
AR Write Off	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00
WIP	222,137.81	11,399.40	210,738.41						
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

}

10/04/21 15:29:49 PROFORMA STATEMENT FOR MATTER 378827.00003 (Krista Freitag, as Receiver for ANI Deve) (SEC v. Champion-Cain - Asset Investigati)

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: 04/20/21

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

Proforma Number: 1117633

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	
10/01/20	8223861	Communications with counsel for Second Source re: document production pursuant to subpoena (.2) communications with counsel for K. Peterson (.1) advise on issues re: fifth batch of ANI repository production (.2) advise on issues re: Endeavor Bank shares held by Computershare as custodian (.2)	Fates, Edward (Ted)	0.70	428.40	428.40	WO	HD	TR
10/01/20	8223932	Analysis and determination of responsive documents in preparation for attorney review.	Peng, Simona	2.00	603.00	1,031.40	WO	HD	TR
10/01/20	8234558	Prepare for and participate in teleconference with counsel regarding K. Peterson document review efforts (.6); confer with subpoena recipients regarding productions (.4); confer with S. Peng regarding downloading production from EisnerAmper (.1); download production from Second Source (.2).	Aspis, Norman	1.30	579.15	1,610.55	WO	HD	TR

10/04/21 15:29:49 PROFORMA STATEMENT FOR MATTER 378827.00003 (Krista Freitag, as Receiver for ANI Deve) (SEC v. Champion-Cain - Asset Investigati)

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

Trans Date	Index	Description of Service Rendered	Timekeeper	Hours	Fees	Sum	Circle	Action	
10/01/20	8252565	Review, analysis and exchange of various e-mails re: owned data and other repository issues and strategy to resolve same.	Farrell, Michael	0.60	442.80	2,053.35	WO	HD	TR
10/02/20	8224377	Analysis and determination of responsive documents in preparation for attorney review.	Peng, Simona	1.00	301.50	2,354.85	WO	HD	TR
10/02/20	8224421	Call/emails with new counsel for K. Peterson re: ANI repository and document production issues (.6) analyze and advise on approach/next steps re: shared data from Google vault for ANI repository purposes, call/emails with Receiver re: same (.7) advise on next steps re: EisnerAmper document production (.2)	Fates, Edward (Ted)	1.50	918.00	3,272.85	WO	HD	TR
10/02/20	8225874	Review of the records/documents to be produced to support Receiver's Hiscox Insurance claim as to Mr. Torres, follow-up email/conference.	Zaro, David	0.70	563.85	3,836.70	WO	HD	TR
10/02/20	8234618	Review and circulate document productions from subpoena recipients (.4); attention to correspondence with Computershare representative (.1).	Aspis, Norman	0.50	222.75	4,059.45	WO	HD	TR
10/02/20	8252804	Review, analysis and exchange of various e-mails re: additional production of data (.4); participated in team conference call re: remaining data and strategy to address same (.5); drafted correspondence to group re: additional production (.3); review, analysis and exchange of e-mails re: new investor counsel and addressing inclusion of same (.3); review and analysis of order in	Farrell, Michael	1.80	1,328.40	5,387.85	WO	HD	TR

10/04/21 15:29:49 PROFORMA STATEMENT FOR MATTER 378827.00003 (Krista Freitag, as Receiver for ANI Deve) (SEC v. Champion-Cain - Asset Investigati)

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

Trans Date	Index	Description of Service Rendered related case and analysis re: potential effect on receivership issues (.3).	Timekeeper	Hours	Fees	Sum	Circle Action			
10/05/20	8226597	Analysis and review of e-mails re: shared drives issue and resolution of same (.2); review, analysis and exchange of e-mails with multiple investor counsel re: recent repository productions and access to/copies of same (.4); analysis and exchange of e-mails re: cost of and options for additional hard drive production (.5).	Farrell, Michael	1.10	811.80	6,199.65	WO	HD	TR	_____
10/05/20	8227072	Analysis and determination of document productions in preparation for attorney review.	Peng, Simona	3.70	1,115.55	7,315.20	WO	HD	TR	_____
10/05/20	8228518	coordinate distribution of physical media to interested parties	Neglia, Ross	1.70	512.55	7,827.75	WO	HD	TR	_____
10/05/20	8228989	Address the production of records to Hiscox concerning the Torres claim prepare the documents (1.1). Follow-up on draft letter to Hiscos and follow-up emails (.6).	Zaro, David	1.70	1,369.35	9,197.10	WO	HD	TR	_____
10/06/20	8227103	Analysis and determination of document productions in preparation for attorney review.	Peng, Simona	0.50	150.75	9,347.85	WO	HD	TR	_____
10/06/20	8229021	coordinate distribution of physical media to interested parties	Neglia, Ross	1.60	482.40	9,830.25	WO	HD	TR	_____
10/06/20	8231347	Prepare for and participate in teleconference with counsel for R. Houts (.6).	Aspis, Norman	0.60	267.30	10,097.55	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	
10/06/20	8252377	Review, analysis and exchange of various e-mails re: process for providing prior productions on request, response to investor inquiry, and other repository issues.	Farrell, Michael	0.60	442.80	10,540.35	WO	HD	TR
10/07/20	8227394	Advise on strategy and next steps for tolling agreement and subpoena production from Merit Financial (.3) advise on next steps for ANI repository and analysis of remaining Google shared data (.4) respond to inquiries from counsel for investor re: ANI repository documents (.2)	Fates, Edward (Ted)	0.90	550.80	11,091.15	WO	HD	TR
10/07/20	8228120	Analysis and determination of document productions in preparation for attorney review.	Peng, Simona	0.30	90.45	11,181.60	WO	HD	TR
10/07/20	8252223	Review, analysis and exchange of e-mails re: investor inquiry and DISCO issues.	Farrell, Michael	0.50	369.00	11,550.60	WO	HD	TR
10/08/20	8228626	Communications with SEC counsel re: issues relating to Bandini joint motion (.4) communications with Receiver and G. Rodriguez re: Valle Vista sale (.2) call with counsel for S. Cain re: Bandini joint motion and Valle Vista sale issues (.4) respond to inquiry from counsel for First Choice Bank re: same (.3) call with Receiver and vendor re: ANI repository and Google shared data issues (.4)	Fates, Edward (Ted)	1.70	1,040.40	12,591.00	WO	HD	TR
10/08/20	8230984	Review executed tolling agreements and counter-execute the same; correspond with counsel regarding the same (.4).	Aspis, Norman	0.40	178.20	12,769.20	WO	HD	TR

10/04/21 15:29:49 PROFORMA STATEMENT FOR MATTER 378827.00003 (Krista Freitag, as Receiver for ANI Deve) (SEC v. Champion-Cain - Asset Investigati)

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

Trans Date	Index	Description of Service Rendered	Timekeeper	Hours	Fees	Sum	Circle	Action		
10/08/20	8235882	Analysis and determination of document productions in preparation for attorney review.	Peng, Simona	0.80	241.20	13,010.40	WO	HD	TR	_____
10/09/20	8230935	Review production from EisnerAmper and confer with counsel regarding redactions (.5).	Aspis, Norman	0.50	222.75	13,233.15	WO	HD	TR	_____
10/09/20	8232571	Communications with counsel for Champion-Cain re: Endeavor Bank shares	Fates, Edward (Ted)	0.20	122.40	13,355.55	WO	HD	TR	_____
10/12/20	8232504	Communications with counsel for S. Cain re: joint motion for Bandini settlement (.2) discuss same with Receiver (.3) analyze and advise on next steps re: EisnerAmper document production and redactions (.4)	Fates, Edward (Ted)	0.90	550.80	13,906.35	WO	HD	TR	_____
10/12/20	8233962	Identify additional relevant ANI data for production to interested parties	Neglia, Ross	0.50	150.75	14,057.10	WO	HD	TR	_____
10/12/20	8252140	Review, analysis and exchange of e-mails re: investor counsel requests concerning document productions and response to same (.3); analysis and review of e-mail re: data review issues and strategy (.2).	Farrell, Michael	0.50	369.00	14,426.10	WO	HD	TR	_____
10/13/20	8232513	Communications with court law clerk re: proposed orders for pending joint motions (.2) discuss ANI server issues for repository with Receiver (.2)	Fates, Edward (Ted)	0.40	244.80	14,670.90	WO	HD	TR	_____
10/13/20	8251819	Analysis and review of e-mails re: server issues.	Farrell, Michael	0.20	147.60	14,818.50	WO	HD	TR	_____
10/14/20	8233350	Advise on outstanding subpoena issues, follow up/approach, and redactions (.6)	Fates, Edward (Ted)	1.70	1,040.40	15,858.90	WO	HD	TR	_____

10/04/21 15:29:49 PROFORMA STATEMENT FOR MATTER 378827.00003 (Krista Freitag, as Receiver for ANI Deve) (SEC v. Champion-Cain - Asset Investigati)

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

Trans Date	Index	Description of Service Rendered	Timekeeper	Hours	Fees	Sum	Circle	Action	
		advise on repository data processing cost issues (.3) discuss same with Receiver (.2) communications with counsel for S. Cain re: Bandini joint motion (.1) discuss issues relating to Endeavor Bank shares with Receiver and counsel for Champion-Cain (.5)							
10/14/20	8236126	Several emails concerning court order on the stipulation related to D Street.	Zaro, David	0.30	241.65	16,100.55	WO	HD	TR
10/14/20	8236692	coordinate distribution of physical media to interested parties	Neglia, Ross	1.10	331.65	16,432.20	WO	HD	TR
10/14/20	8251708	Review, analysis and exchange of e-mails re: request for data access and response to same.	Farrell, Michael	0.30	221.40	16,653.60	WO	HD	TR
10/14/20	8253498	Review documents produced by EisnerAmper and confer with counsel regarding the same (1.6); confer with counsel for EisnerAmper and HAV regarding redactions (.5).	Aspis, Norman	2.10	935.55	17,589.15	WO	HD	TR
10/15/20	8235301	Communications with counsel for CalPrivate Bank re: request for information relating to ANI liquor licenses (.4) calls/emails with Receiver and outside vendor re: Google vault shared data for ANI repository (.7)	Fates, Edward (Ted)	1.10	673.20	18,262.35	WO	HD	TR
10/15/20	8236705	coordinate distribution of physical media to interested parties	Neglia, Ross	0.60	180.90	18,443.25	WO	HD	TR
10/15/20	8251426	Review, analysis and exchange of e-mails re: investor request for assistance and	Farrell, Michael	0.60	442.80	18,886.05	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	
		handling of same (.3); review, analysis and exchange of e-mails re: shared data review and approach to same (.3).							
10/16/20	8235851	Communications with counsel for S. Cain re: Bandini joint motion (.2) advise on issues re: subpoena production and redactions (.3)	Fates, Edward (Ted)	0.50	306.00	19,192.05	WO	HD	TR
10/16/20	8236696	Analysis and determination of document productions in preparation for attorney review.	Peng, Simona	0.50	150.75	19,342.80	WO	HD	TR
10/16/20	8239989	Call with counsel and email related to insurance claim/Hiscox response/forensic accountant.	Zaro, David	0.40	322.20	19,665.00	WO	HD	TR
10/16/20	8239990	Analysis of the subpoena and the privilege issues concerning subpoena of tax records.	Zaro, David	0.40	322.20	19,987.20	WO	HD	TR
10/16/20	8251382	Telephone conference, analysis and review of pertinent materials re: issues and strategy for addressing remaining data with interested parties (.5); reviewed e-mails re: repository budget history and projections (.2).	Farrell, Michael	0.70	516.60	20,503.80	WO	HD	TR
10/16/20	8254236	Attention to issues in connection with outstanding subpoenas (.2).	Aspis, Norman	0.20	89.10	20,592.90	WO	HD	TR
10/19/20	8237652	Communications with SEC counsel re: issues with Endeavor Bank shares/account (.2) advise Receiver re: issues concerning personal property located at Hancock Street office (.2)	Fates, Edward (Ted)	0.40	244.80	20,837.70	WO	HD	TR

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10/19/20	8251339	Review, analysis and exchange of e-mails re: data review issues and strategy.	Farrell, Michael	0.30	221.40	21,059.10	WO	HD	TR	_____
10/20/20	8240050	Evaluate the Hiscox letter/email and email with Receiver regarding claim (.2). Call with Receiver to assess the forensic accountant demands, Receiver response (.4). Follow-up call to Hiscox related to the forensic accounting matters as to Torres (.3).	Zaro, David	0.90	724.95	21,784.05	WO	HD	TR	_____
10/20/20	8251224	Analysis and review of various e-mails re: repository issues and planning.	Farrell, Michael	0.30	221.40	22,005.45	WO	HD	TR	_____
10/21/20	8239909	Discuss content and plan for forensic accounting report with Receiver (.8) discuss issues re: Endeavor Bank shares with SEC counsel and counsel for Champion-Cain (.6) communications with counsel for Champion-Cain re: same (.2) analyze and advise on next steps re: subpoenas for additional bank records (.3)	Fates, Edward (Ted)	1.90	1,162.80	23,168.25	WO	HD	TR	_____
10/21/20	8241794	Analysis and determination of document productions in preparation for attorney review.	Peng, Simona	2.00	603.00	23,771.25	WO	HD	TR	_____
10/22/20	8241114	Discuss forensic accounting and subpoenas for additional bank records with Receiver and S. Hoslett (.4) follow up calls with counsel for S. Cain re: Bandini joint motion (.5)	Fates, Edward (Ted)	0.90	550.80	24,322.05	WO	HD	TR	_____
10/22/20	8241869	Analysis and determination of document productions in preparation for attorney review.	Peng, Simona	0.50	150.75	24,472.80	WO	HD	TR	_____

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10/22/20	8244536	Call with Hiscox concerning the forensic accounting request, follow-up regarding same (.3). Email related to Hiscox and address the strategy for response (.4).	Zaro, David	0.70	563.85	25,036.65	WO	HD	TR	_____
10/22/20	8245971	Confer with L. Ryan and S. Hoslett regarding outstanding subpoenas for Peterson accounts (.4).	Aspis, Norman	0.40	178.20	25,214.85	WO	HD	TR	_____
10/23/20	8242397	Work on revisions to Bandini joint motion (.4) communications with SEC counsel and counsel for Champion-Cain re: same (.3)	Fates, Edward (Ted)	0.70	428.40	25,643.25	WO	HD	TR	_____
10/23/20	8242921	Telephone conference, analysis and review of e-mails re: updates on additional information for potential production.	Farrell, Michael	0.40	295.20	25,938.45	WO	HD	TR	_____
10/23/20	8246683	Evaluate the accounting issues, work with Receiver as to forensic accounting, address status/strategy.	Zaro, David	0.40	322.20	26,260.65	WO	HD	TR	_____
10/23/20	8246684	Hiscox - Assess further issues related to the Hiscox claim/insurance (.3). Conference call with Receiver related to the Hiscox forensic accounting claim (.4).	Zaro, David	0.70	563.85	26,824.50	WO	HD	TR	_____
10/26/20	8243442	Confer with SEC counsel re: joint motion re: Bandini (.2) communications with counsel for Champion-Cain re: Endeavor Bank shares (.2) advise on issues/next steps re: Merit Financial document production (.3)	Fates, Edward (Ted)	0.70	428.40	27,252.90	WO	HD	TR	_____
10/26/20	8251145	Review, analysis and exchange of e-mails with M. Shipley re: document production and communication issues.	Farrell, Michael	0.20	147.60	27,400.50	WO	HD	TR	_____

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10/27/20	8245365	Analyze and advise on next steps re: Google shared data for ANI repository	Fates, Edward (Ted)	0.40	244.80	27,645.30	WO	HD	TR
10/27/20	8251125	Review, analysis and exchange of e-mails re: counsel request for renewed access to previously produced documents and analysis re: response to same (.3); reviewed correspondence re: estimated cost of producing remaining data and analysis re: effect of same on communications with interested parties (.3).	Farrell, Michael	0.60	442.80	28,088.10	WO	HD	TR
10/27/20	8252530	Review case law regarding right to financial privacy and draft email to J. Kirby regarding redactions applied to EisnerAmper production (1.1); download and review production from JPMorgan Chase (.8).	Aspis, Norman	1.90	846.45	28,934.55	WO	HD	TR
10/28/20	8246120	Analyze Receiver's outline/framework for forensic accounting report (.7) call with Receiver re: same (1.1) advise on subpoenas issued to Awerbuch/Merit Financial and EisnerAmper, redactions and protective order issues (.3) advise on subpoenas for additional bank records/accounts (.2)	Fates, Edward (Ted)	2.30	1,407.60	30,342.15	WO	HD	TR
10/28/20	8251004	Review, analysis and exchange of various e-mails re: addressing counsel request for previously produced data.	Farrell, Michael	0.40	295.20	30,637.35	WO	HD	TR
10/28/20	8252632	Prepare and revise subpoenas to third-party financial institutions (1); confer with S. Peng to transmit certain documents to A. Johnson at the SEC (.2); attention to issues in connection with outstanding subpoenas	Aspis, Norman	1.50	668.25	31,305.60	WO	HD	TR

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10/28/20	8252760	Analysis and determination of document productions in preparation for attorney review.	Peng, Simona	0.50	150.75	31,456.35	WO	HD	TR
10/29/20	8247476	Analyze and revise document subpoenas for additional bank records/accounts relevant to Receiver's accounting (.5) discuss same with Receiver (.2) discuss final revisions Bandini joint motion with counsel for SEC, counsel for Champion-Cain, and counsel for S. Cain (.7) discuss issues re: Endeavor Bank shares with SEC counsel (.2) advise Receiver re: same (.1) analyze and advise on EisnerAmper document production issues (.2) discuss issues re: Endeavor Bank shares with Champion-Cain counsel (.3) analyze draft proposed order for Bandini joint motion (.3) discuss same with Receiver (.1)	Fates, Edward (Ted)	2.60	1,591.20	33,047.55	WO	HD	TR
10/29/20	8249051	Attention to case administration issues in connection with various subpoenas (.5).	Aspis, Norman	0.50	222.75	33,270.30	WO	HD	TR
10/30/20	8248994	Revisions to proposed order for Bandini joint motion (.8) discuss same with Receiver (.4) communications with counsel for Champion-Cain re: same (.1) advise on issues re: protective order for Awerbuch/Merit Financial document production (.2) discuss status of ANI repository issues with Receiver (.2) advise on approach/next steps to Google shared data issues (.4) communications with counsel for Leaf & Cole (.2)	Fates, Edward (Ted)	2.30	1,407.60	34,677.90	WO	HD	TR

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10/30/20	8250777	Review and analysis of correspondence from team re: repository issues, costs and strategy (.4); telephone conference, analysis and exchange of e-mails re: strategy for communicating next steps to interested parties (.7); draft e-mail to team re: outline of future communication and exchanged e-mails re: same (.3); review, analysis and exchange of e-mails re: handling of investor counsel request for assistance (.2).	Farrell, Michael	1.60	1,180.80	35,858.70	WO	HD	TR	_____
10/30/20	8252189	Attention to case administration issues in connection with outstanding subpoenas (.2).	Aspis, Norman	0.20	89.10	35,947.80	WO	HD	TR	_____
11/02/20	8254292	Advise on next steps re: outstanding document subpoenas (.2) revisions to draft joint motion and proposed order re: protective order for Merit Financial/Awerbuch production (.4)	Fates, Edward (Ted)	0.60	367.20	36,315.00	WO	HD	TR	_____
11/02/20	8255758	Follow-u on the claims against the Hiscox Insurance Co. to address the claims arising out of Torres.	Zaro, David	0.40	322.20	36,637.20	WO	HD	TR	_____
11/02/20	8268405	Analysis and determination of document productions in preparation for attorney review.	Peng, Simona	0.50	150.75	36,787.95	WO	HD	TR	_____
11/02/20	8280913	Review, analysis and exchange of e-mails re: repository issues.	Farrell, Michael	0.20	147.60	36,935.55	WO	HD	TR	_____
11/02/20	8281836	Prepare joint motion for protective order and proposed order regarding Awerbuch	Aspis, Norman	1.10	490.05	37,425.60	WO	HD	TR	_____

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		production (1.1).							
11/03/20	8255097	Communications with counsel for Champion-Cain and SEC counsel re: Bandini joint motion (.2) call with Receiver and G. Rodriguez re: Google vault shared data and server data analysis for ANI document repository (.9)	Fates, Edward (Ted)	1.10	673.20	38,098.80	WO	HD	TR _____
11/03/20	8255619	Analysis and determination of document productions in preparation for attorney review.	Peng, Simona	0.50	150.75	38,249.55	WO	HD	TR _____
11/03/20	8258359	Email/call with counsel to address further subpoenas to support third party claims/Receiver's accounting.	Zaro, David	0.30	241.65	38,491.20	WO	HD	TR _____
11/03/20	8281427	Analysis and participation in conference call re: repository issues, timing and strategy.	Farrell, Michael	0.50	369.00	38,860.20	WO	HD	TR _____
11/03/20	8281694	Prepare various subpoenas to financial institutions for Peterson accounts (1.1).	Aspis, Norman	1.10	490.05	39,350.25	WO	HD	TR _____
11/04/20	8256818	Address updates/next steps for Google Vault shared data for ANI document repository	Fates, Edward (Ted)	0.20	122.40	39,472.65	WO	HD	TR _____
11/04/20	8258508	Work on draft of response to the Hiscox forensic accounting requests/production.	Zaro, David	0.60	483.30	39,955.95	WO	HD	TR _____
11/04/20	8259114	Review, analysis and exchange of various e-mails re: communications with DISCO and various repository issues.	Farrell, Michael	0.60	442.80	40,398.75	WO	HD	TR _____
11/04/20	8268421	Analysis and determination of document productions in preparation for attorney	Peng, Simona	0.50	150.75	40,549.50	WO	HD	TR _____

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11/04/20	8281615	Attention to outstanding subpoenas (.2).	Aspis, Norman	0.20	89.10	40,638.60	WO	HD	TR _____
11/05/20	8257460	Discuss forensic data collection/imaging issues with Receiver and G. Rodriguez	Fates, Edward (Ted)	0.30	183.60	40,822.20	WO	HD	TR _____
11/05/20	8258528	Work on the draft letter ot Hiscox concerning Torres insurance claim/document production (.9). Call with Receiver related to the Hiscox insurance letter (.2)	Zaro, David	1.10	886.05	41,708.25	WO	HD	TR _____
11/05/20	8281483	Confer with Schwab regarding subpoena (.3); confer with M. Nagata regarding production (.2).	Aspis, Norman	0.50	222.75	41,931.00	WO	HD	TR _____
11/06/20	8257965	Analyze and advise on issues for Receiver's forensic accounting report (.2) address issues re: ANI server and forensic data collection/analysis (.3)	Fates, Edward (Ted)	0.50	306.00	42,237.00	WO	HD	TR _____
11/06/20	8258980	Analysis and review of e-mails re: shared drives review, cost and scope issues, and overall strategy.	Farrell, Michael	0.40	295.20	42,532.20	WO	HD	TR _____
11/06/20	8259360	Attention to issues in connection with subpoenas, including conferring with counsel for Ilan Awerbuch (.3).	Aspis, Norman	0.30	133.65	42,665.85	WO	HD	TR _____
11/06/20	8259682	Final revisions to letter, call with counsel regarding Hiscox forensic accounting letter and email, follow-up regarding same.	Zaro, David	0.80	644.40	43,310.25	WO	HD	TR _____

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11/09/20	8259650	Communications with SEC counsel and counsel for Champion-Cain re: Bandini joint motion	Fates, Edward (Ted)	0.30	183.60	43,493.85	WO	HD	TR
11/10/20	8268216	Review correspondence relating to subpoena to JP Morgan Chase (.2).	Aspis, Norman	0.20	89.10	43,582.95	WO	HD	TR
11/11/20	8262563	Advise on issues re: outstanding document subpoenas	Fates, Edward (Ted)	0.20	122.40	43,705.35	WO	HD	TR
11/11/20	8281152	Confer with counsel and K. Freitag regarding Peterson subpoenas (.5).	Aspis, Norman	0.50	222.75	43,928.10	WO	HD	TR
11/12/20	8263131	Discuss status and next steps re: forensic data work and ANI document repository with Receiver and G. Rodriguez (.9) respond to inquiries from counsel for CalPrivate Bank and counsel for CTC re: ANI document repository (.5) advise Receiver re: order approving Bandini joint motion (.1)	Fates, Edward (Ted)	1.50	918.00	44,846.10	WO	HD	TR
11/12/20	8264660	Preparation for and participation in conference call with team re: data collection and analysis issues and strategy (.8); analysis and exchange of various e-mails re: same (.3).	Farrell, Michael	1.10	811.80	45,657.90	WO	HD	TR
11/13/20	8264211	Advise Receiver on scope and strategic for preliminary accounting report (.6) discuss issues re: Schwab document subpoena and objection from counsel for K. Peterson with Receiver and counsel (.3) advise on next steps re: Merit document production and review (.2)	Fates, Edward (Ted)	1.10	673.20	46,331.10	WO	HD	TR

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11/13/20	8279350	Analysis and review of e-mails re: data processing issues and progress.	Farrell, Michael	0.30	221.40	46,552.50	WO	HD	TR	_____
11/13/20	8280965	Confer with M. Nagata and counsel regarding production of documents (.3); review document production from Wells Fargo (.5); review production from Western Alliance Bank (.4).	Aspis, Norman	1.20	534.60	47,087.10	WO	HD	TR	_____
11/16/20	8265514	Respond to request from attorney for investor re: access to repository documents (.3) discuss forensic accounting analysis with Receiver (.2) analyze issues re: ANI data collection and preservation (.2)	Fates, Edward (Ted)	0.70	428.40	47,515.50	WO	HD	TR	_____
11/16/20	8271581	Confer with M. Nagata regarding document production (.2); confer with K. Peterson's counsel and Schwab regarding outstanding subpoena (.3); review and transmit subpoena productions to Receiver and team (.4).	Aspis, Norman	0.90	400.95	47,916.45	WO	HD	TR	_____
11/17/20	8271560	Finalize and serve supplemental subpoena to JP Morgan Chase (.3); attention to issues in connection with outstanding subpoenas for Peterson accounts (.4).	Aspis, Norman	0.70	311.85	48,228.30	WO	HD	TR	_____
11/18/20	8269276	Confer with M. Nagata regarding Merit Financial's and Ilan Awerbuch's productions (.3).	Aspis, Norman	0.30	133.65	48,361.95	WO	HD	TR	_____
11/18/20	8272700	attention to review of incoming third-party productions	Neglia, Ross	0.60	180.90	48,542.85	WO	HD	TR	_____
11/18/20	8278910	Analysis and review of e-mails re: data issues, timing and strategy.	Farrell, Michael	0.30	221.40	48,764.25	WO	HD	TR	_____

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11/19/20	8270256	Discuss forensic accounting issues and preliminary accounting report with Receiver	Fates, Edward (Ted)	0.60	367.20	49,131.45	WO	HD	TR	_____
11/19/20	8278857	Analysis and review of e-mails re: updates on data processing issues.	Farrell, Michael	0.20	147.60	49,279.05	WO	HD	TR	_____
11/20/20	8270566	Communications with Receiver re: repository-related e-discovery costs	Fates, Edward (Ted)	0.20	122.40	49,401.45	WO	HD	TR	_____
11/20/20	8276624	Analysis and review of e-mails re: data processing and repository issues.	Farrell, Michael	0.30	221.40	49,622.85	WO	HD	TR	_____
11/22/20	8271950	Discuss scope and strategy for preliminary accounting report due 12/1 with Receiver	Fates, Edward (Ted)	0.80	489.60	50,112.45	WO	HD	TR	_____
11/23/20	8272886	Discuss forensic accounting issues and investor net loss analysis with Receiver	Fates, Edward (Ted)	1.10	673.20	50,785.65	WO	HD	TR	_____
11/23/20	8273013	Analysis and review of various e-mails re: shared documents assessment and related considerations.	Farrell, Michael	0.20	147.60	50,933.25	WO	HD	TR	_____
11/23/20	8280715	Confer with M. Nagata regarding Awerbuch production of records (.2).	Aspis, Norman	0.20	89.10	51,022.35	WO	HD	TR	_____
11/24/20	8273542	Analyze and revise Receiver's preliminary forensic accounting report (2.4) discuss same with Receiver (.8)	Fates, Edward (Ted)	3.20	1,958.40	52,980.75	WO	HD	TR	_____
11/24/20	8276289	Analysis and review of e-mails re: updates on data processing.	Farrell, Michael	0.30	221.40	53,202.15	WO	HD	TR	_____
11/24/20	8280414	Review and transmit productions in response to subpoenas from financial	Aspis, Norman	0.50	222.75	53,424.90	WO	HD	TR	_____

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11/25/20	8276278	Analysis and exchange of e-mails re: recent developments and call scheduling.	Farrell, Michael	0.30	221.40	53,646.30	WO	HD	TR	_____
11/25/20	8280188	Teleconference regarding Peterson subpoenas (1.2); review response to subpoena from Western Alliance (.4).	Aspis, Norman	1.60	712.80	54,359.10	WO	HD	TR	_____
11/25/20	8464796	Advise Receiver on issues re: recovery of Endeavor Bank CD funds, prepare draft letter re: same (.5) communications with counsel for Champion-Cain re: same (.2)	Fates, Edward (Ted)	0.70	428.40	54,787.50	WO	HD	TR	_____
11/30/20	8278646	Preparation for and participation in conference call with clients and counsel re: data issues, timing and strategy.	Farrell, Michael	0.40	295.20	55,082.70	WO	HD	TR	_____
11/30/20	8280108	Confer with counsel and financial institutions regarding outstanding subpoena issues (.5).	Aspis, Norman	0.50	222.75	55,305.45	WO	HD	TR	_____
11/30/20	8280862	Email/review draft letter to Hiscox forensic accountant, follow-up email to Receiver and response.	Zaro, David	0.70	563.85	55,869.30	WO	HD	TR	_____
11/30/20	8464808	Follow up communications with counsel for Champion-Cain re: Endeavor Bank account (.6) discuss outstanding subpoenas for K. Peterson-related accounts with Receiver (.3) work on same (.2) call with Receiver and G. Rodriguez re: ANI data collection and repository production issues (.5).	Fates, Edward (Ted)	1.60	979.20	56,848.50	WO	HD	TR	_____
12/01/20	8284047	Revise/redraft the Receiver's Hiscox letter to forensic accountant to address the	Zaro, David	0.80	644.40	57,492.90	WO	HD	TR	_____

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12/01/20	8285856	Review production of I. Awerbuch and Merit Financial (2.3).	Aspis, Norman	2.30	1,024.65	58,517.55	WO	HD	TR
12/01/20	8464811	Advise Receiver re: recovery of Endeavor Bank assets and next steps (.5).	Fates, Edward (Ted)	0.50	306.00	58,823.55	WO	HD	TR
12/02/20	8282628	Analyze and advise on outstanding subpoenas and next steps re: productions (.5) communications with Receiver and counsel for Champion-Cain re: steps for recovery for Endeavor Bank assets (.6) analyze and advise Receiver on responses to media inquiry re: preliminary accounting report (.8)	Fates, Edward (Ted)	1.90	1,162.80	59,986.35	WO	HD	TR
12/02/20	8285753	Attention to outstanding issues in connection with subpoenas and confer with counsel regarding the same (.5); review subpoenas for Peterson-related accounts and prepare list regarding the same (.4); prepare subpoena to JPMorgan Chase and confer with JPMorgan Chase representative regarding outstanding subpoena issues (.5), and prepare letter to JPMorgan Chase representative regarding outstanding subpoena and transmit the same (.4); ingest productions and transmit the same (.5).	Aspis, Norman	2.30	1,024.65	61,011.00	WO	HD	TR
12/03/20	8283538	Advise on next steps re: subpoenas for K. Peterson-related accounts and communications with counsel for K. Peterson re: same (.4) advise on	Fates, Edward (Ted)	1.90	1,162.80	62,173.80	WO	HD	TR

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		review/analysis of Merit Financial/Awerbuch document production (.3) respond to inquiry from counsel for First Choice Bank re: status of sales relating to Bandini settlement (.3) communications with counsel Champion-Cain re: next steps for recovery Endeavor Bank assets (.3) work on same (.3) analyze and discuss CTC request re: accounting info with Receiver (.3)							
12/03/20	8285714	Confer with JPMorgan Chase representative regarding outstanding subpoena issues (.4).	Aspis, Norman	0.40	178.20	62,352.00	WO	HD	TR
12/07/20	8286040	Communications with counsel for First Choice re: Bandini-related issues (.2) communications with counsel for Champion-Cain re: Endeavor Bank issues (.2) discuss subpoenas for additional Peterson-related accounts with Receiver (.4)	Fates, Edward (Ted)	0.80	489.60	62,841.60	WO	HD	TR
12/07/20	8288866	Review documents, revise Hiscox letter and assess approach to the insurer (.6). Attend call with the Receiver to address the Hiscox claim and finalize letter (.3).	Zaro, David	0.90	724.95	63,566.55	WO	HD	TR
12/07/20	8299168	Review various document productions and attention to outstanding subpoena issues (1.1); review documents produced by I. Awerbuch and Merit Financial (1.2).	Aspis, Norman	2.30	1,024.65	64,591.20	WO	HD	TR
12/08/20	8287137	Analyze and advise on subpoenas for additional Peterson-related accounts, work on same	Fates, Edward (Ted)	0.60	367.20	64,958.40	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			
12/08/20	8289816	Further revisions to draft letter to insurance company, forensic accounting and review of documents to be produced to Ms. Kinsel and Hlscox Insurance Co. (.6). Call with the Receiver, prepare document production, follow-up revisions and finalize letter (.6).	Zaro, David	1.20	966.60	65,925.00	WO	HD	TR	_____
12/08/20	8310159	Attention to outstanding subpoena issues and the issuance of new subpoenas (1.2).	Aspis, Norman	1.20	534.60	66,459.60	WO	HD	TR	_____
12/09/20	8288325	Communications with counsel for K. Peterson re: subpoenas to financial institutions for account records and confidentiality concerns re: same (.4) communications with Receiver re: notarized letter to Endeavor Bank re: release of funds (.3) advise on strategy and next steps re: Merit Financial/Awerbuch document production issues (.2)	Fates, Edward (Ted)	0.90	550.80	67,010.40	WO	HD	TR	_____
12/09/20	8292672	Analysis and determination of document productions in preparation for attorney review.	Peng, Simona	0.50	150.75	67,161.15	WO	HD	TR	_____
12/09/20	8310316	Prepare and finalize several subpoenas for service (2.1).	Aspis, Norman	2.10	935.55	68,096.70	WO	HD	TR	_____
12/11/20	8311020	Review documents produced by Merit Financial and I. Awerbuch (1.1).	Aspis, Norman	1.10	490.05	68,586.75	WO	HD	TR	_____
12/14/20	8292692	Analysis and determination of document productions in preparation for attorney review.	Peng, Simona	0.50	150.75	68,737.50	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		
12/14/20	8295142	Communications with Receiver and counsel for Champion-Cain re: facts and legal issues related remaining Endeavor Bank assets	Fates, Edward (Ted)	0.80	489.60	69,227.10	WO	HD	TR	_____
12/14/20	8299145	Confer with Wells Fargo representative regarding outstanding subpoena responses, and prepare and transmit fax with additional information (.7); review supplemental production from Merit Financial and I. Awerbuch (1.9).	Aspis, Norman	2.60	1,158.30	70,385.40	WO	HD	TR	_____
12/15/20	8299034	Confer with M. Nagata regarding outstanding production (.2); attention to issues in connection with outstanding productions (.3).	Aspis, Norman	0.50	222.75	70,608.15	WO	HD	TR	_____
12/15/20	8307820	Review, analysis and exchange of e-mails re: data issues and strategy.	Farrell, Michael	0.20	147.60	70,755.75	WO	HD	TR	_____
12/16/20	8294929	Call with Receiver and G. Rodriguez re: DISCO data collection work and next steps re: remaining repository-related data	Fates, Edward (Ted)	0.20	122.40	70,878.15	WO	HD	TR	_____
12/16/20	8298992	Confer with Well Fargo representative regarding subpoena response (.3); confer with M. Nagata regarding subpoena production (.1); review production from Wells Fargo (.3).	Aspis, Norman	0.70	311.85	71,190.00	WO	HD	TR	_____
12/16/20	8308200	Participated in team conference call re: data issues and strategy and analysis re: same.	Farrell, Michael	0.30	221.40	71,411.40	WO	HD	TR	_____
12/18/20	8297363	Discuss steps remaining to complete approved Bandini transaction with Receiver (.2) communications with counsel for S.	Fates, Edward (Ted)	1.40	856.80	72,268.20	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	Timekeeper	Hours	Fees	Sum	Circle	Action	
		Cain, counsel for Champion-Cain, and SEC counsel re: same (.3) call with Receiver and G. Rodriguez re: data preservation issues and remaining ANI repository issues (.9)							
12/18/20	8298918	Confer with representatives at financial institutions regarding outstanding subpoenas (.2); confer with M. Nagata regarding Merit Financial production (.1).	Aspis, Norman	0.30	133.65	72,401.85	WO	HD	TR
12/21/20	8302041	Research/analysis of the Madoff decision/interest on fraudulent conveyance claims as to net winners, advice to counsel as to letter demands.	Zaro, David	0.80	644.40	73,046.25	WO	HD	TR
12/22/20	8300544	Call with counsel for S. Cain and status and next steps for Bandini escrow/refinance and payment to receivership (.3) discuss next steps and communications with Endeavor Bank with Receiver (.4) revise message to Endeavor Bank (.2)	Fates, Edward (Ted)	0.90	550.80	73,597.05	WO	HD	TR
12/22/20	8302979	Attention to outstanding subpoena issues, including teleconference with Wells Fargo representative (.5).	Aspis, Norman	0.50	222.75	73,819.80	WO	HD	TR
12/23/20	8301829	Call with counsel for Banc of California re: document production in response to subpoena, protective order, and related issues	Fates, Edward (Ted)	0.30	183.60	74,003.40	WO	HD	TR
12/23/20	8302725	Review and download production from Banc of California (.5); draft demand letter to M. Nagata regarding I. Awerbuch and Merit Financial production (.8); review issue in connection with Houts production (.2).	Aspis, Norman	1.50	668.25	74,671.65	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	
12/28/20	8303103	Analyze issues re: potential sale of Endeavor Bank shares (.2) communications with counsel for S. Cain re: Bandini transaction (.2)	Fates, Edward (Ted)	0.40	244.80	74,916.45	WO	HD	TR _____
12/28/20	8311237	Attention to subpoena issues and confer with C. Waidelich regarding certain issues (.5).	Aspis, Norman	0.50	222.75	75,139.20	WO	HD	TR _____
12/29/20	8304688	Analysis and determination of document productions in preparation for attorney review.	Peng, Simona	0.30	90.45	75,229.65	WO	HD	TR _____
12/29/20	8311356	Review, revise, and transmit letter regarding potential claims against R. Houts (.6); attention to subpoena productions (.5).	Aspis, Norman	1.10	490.05	75,719.70	WO	HD	TR _____
12/30/20	8305397	Analyze issues raised by counsel for K. Peterson re: subpoenas issued to banks for account records and advise on same (.4) discuss issues re: Endeavor Bank shares with Receiver (.2)	Fates, Edward (Ted)	0.60	367.20	76,086.90	WO	HD	TR _____
12/30/20	8307896	Attention to outstanding issues in connection with various subpoenas and correspond with counsel regarding the same (1.1).	Aspis, Norman	1.10	490.05	76,576.95	WO	HD	TR _____

Proforma Summary

Timekeeper Number	Timekeeper	Hours	Rate	Amounts
000313	Zaro, David	13.80	805.50	11,115.90
000739	Farrell, Michael	16.30	738.00	12,029.40
001665	Fates, Edward (Ted)	47.70	612.00	29,192.40

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Proforma Summary

Timekeeper

Number	Timekeeper	Hours	Rate	Amounts
002307	Peng, Simona	14.60	301.50	4,401.90
002369	Aspis, Norman	40.40	445.50	17,998.20
002448	Neglia, Ross	6.10	301.50	1,839.15
		138.90		\$76,576.95
Subtotal Fees				\$76,576.95
Discount				0.00
Total Fees				76,576.95
Total Disbursements				0.00

Attorney Billing Instructions

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

Billing Instructions

expires 6/30/2022: 10% off standard rates (automatic); no text editing; copies @ .10

Account Summary – As Of 10/04/21

	Fiscal YTD			Calendar YTD			LTD		
	Total	Fees	Disb.	Total	Fees	Disb.	Total	Fees	Disbursements
Worked	37,577.70	37,577.70	0.00	113,489.55	113,489.55	0.00	609,533.80	600,405.30	9,128.50
Unbilled Adj	0.00	0.00	0.00	0.00	0.00	0.00	3,071.60	6.12	3,065.48
Billed	0.00	0.00	0.00	44,647.09	35,518.59	9,128.50	186,737.58	186,737.58	9,128.50
Collected	0.00	0.00	0.00	44,647.09	35,518.59	9,128.50	195,866.08	186,737.58	9,128.50
AR Write Off	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00
WIP	479,231.70	409,400.10	69,831.60						
Balance									
AR Balance	0.00	0.00	0.00						
Unalloc	0.00								
Payment									
Client Trust	0.00								
Balance									

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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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10/04/21 15:29:50 PROFORMA STATEMENT FOR MATTER 378827.00004 (Krista Freitag, as Receiver for ANI Deve) (SEC v. Champion-Cain - Reporting)

Preliminary Billing Form

Billing Atty: 001665 - Fates, Edward (Ted)

Matter #: 378827.00004

Client Name: Krista Freitag, as Receiver for ANI Deve

Date of Last Billing: 04/20/21

Matter Name: SEC v. Champion-Cain - Reporting

Proforma Number: 1117633

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		
10/28/20	8250581	Evaluate the outline of accounting report and narrative, follow-up with counsel (.6). Meeting with Receiver related to the accounting report and narrative (1.2).	Zaro, David	1.80	1,449.90	1,449.90	WO	HD	TR	_____
11/23/20	8277979	Several conferences to address Receiver's accounting and report with counsel, address outline of report (.6). Email related to the accounting report (.3).	Zaro, David	0.90	724.95	2,174.85	WO	HD	TR	_____
11/25/20	8464797	Work on revisions to Receiver's preliminary accounting report (.9) discuss same with Receiver (.4).	Fates, Edward (Ted)	1.30	795.60	2,970.45	WO	HD	TR	_____
11/30/20	8464809	Discuss updates/revisions to forensic accounting for preliminary report with Receiver (.2)	Fates, Edward (Ted)	0.20	122.40	3,092.85	WO	HD	TR	_____
12/01/20	8284044	Email communications and evaluate further changes to draft accounting and report per Receiver and counsel (.4). Further call/revise draft of the report/accounting and advice to counsel (.4).	Zaro, David	0.80	644.40	3,737.25	WO	HD	TR	_____

10/04/21 15:29:50 PROFORMA STATEMENT FOR MATTER 378827.00004 (Krista Freitag, as Receiver for ANI Deve) (SEC v. Champion-Cain - Reporting)

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

Trans Date	Index	Description of Service Rendered	Timekeeper	Hours	Fees	Sum	Circle Action			
12/01/20	8464812	Discuss revisions to preliminary accounting report with Receiver (.4) work on same (.9).	Fates, Edward (Ted)	1.30	795.60	4,532.85	WO	HD	TR	_____
12/16/20	8294909	Work on Receiver's 5th interim report (1.9) discuss same with Receiver (.2)	Fates, Edward (Ted)	2.10	1,285.20	5,818.05	WO	HD	TR	_____
12/22/20	8300878	Call with Receiver and SEC counsel re: Receiver's 5th interim report, 12/17 hearing, and related issues	Fates, Edward (Ted)	0.60	367.20	6,185.25	WO	HD	TR	_____
12/23/20	8301488	Revisions to Receiver's 5th interim report, discuss same with Receiver	Fates, Edward (Ted)	0.60	367.20	6,552.45	WO	HD	TR	_____

Proforma Summary**Timekeeper**

Number	Timekeeper	Hours	Rate	Amounts
000313	Zaro, David	3.50	805.50	2,819.25
001665	Fates, Edward (Ted)	6.10	612.00	3,733.20
		9.60		\$6,552.45
Subtotal Fees				\$6,552.45
Discount				0.00
Total Fees				6,552.45
Total Disbursements				0.00

Attorney Billing Instructions

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

Billing Instructions

expires 6/30/2022: 10% off standard rates (automatic); no text editing; copies @ .10
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10/04/21 15:29:50 PROFORMA STATEMENT FOR MATTER 378827.00004 (Krista Freitag, as Receiver for ANI Deve) (SEC v. Champion-Cain - Reporting)

Account Summary – As Of 10/04/21

	Fiscal YTD			Calendar YTD			LTD		
	Total	Fees	Disb.	Total	Fees	Disb.	Total	Fees	Disbursements
Worked	1,692.90	1,692.90	0.00	22,834.35	22,834.35	0.00	69,939.45	69,939.45	0.00
Unbilled Adj	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00
Billed	0.00	0.00	0.00	3,385.80	3,385.80	0.00	38,043.45	38,043.45	0.00
Collected	0.00	0.00	0.00	3,385.80	3,385.80	0.00	38,043.45	38,043.45	0.00
AR Write Off	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00
<i>WIP</i>	<i>Total</i>	<i>Fees</i>	<i>Costs</i>						
<i>Balance</i>	<i>31,896.00</i>	<i>31,896.00</i>	<i>0.00</i>						
<i>AR Balance</i>	<i>0.00</i>	<i>0.00</i>	<i>0.00</i>						
<i>Unalloc</i>	<i>0.00</i>								
<i>Payment</i>									
<i>Client Trust</i>	<i>0.00</i>								
<i>Balance</i>									

Billing Address

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

}

10/04/21 15:29:52 PROFORMA STATEMENT FOR MATTER 378827.00005 (Krista Freitag, as Receiver for ANI Deve) (SEC v. Champion-Cain - Operations & Asse)

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: 04/20/21

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

Proforma Number: 1117633

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	
10/01/20	8223759	Communications with G. Rodriguez and counsel for C. Riharb re: Windemere closing and removal of disputed lien from title (.7) discuss revisions to Randolph Street sale motion with Receiver and G. Rodriguez (.3) work on same (.4)	Fates, Edward (Ted)	1.40	856.80	856.80	WO	HD	TR
10/02/20	8224491	Discuss revisions to Randolph Street sale motion with Receiver (.1) work on same (.2) work on Receiver declaration in support of Randolph Street motion (.7) work on proposed order and notice of motion (.3)	Fates, Edward (Ted)	1.30	795.60	1,652.40	WO	HD	TR
10/05/20	8226481	Work on revisions to Receiver declaration re: Randolph sale motion (.2) finalize motion papers (.1) discuss 812 San Rafael sale with G. Rodriguez (.3) initial work on sale motion (.4) communications with counsel for C. Riharb (.5) advise Receiver and G. Rodriguez on issues re: Windemere sale closing and Riharb lien (.4) advise Receiver re: Lamont Street foreclosure sale	Fates, Edward (Ted)	2.80	1,713.60	3,366.00	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	
		(.2) discuss 7940 University Ave. sale with G. Rodriguez (.3) initial work on sale motion (.4)							
10/06/20	8226262	Analyze and advise Receiver on former employee PTO issue (.4) work on 812 San Rafael sale motion (.8) discuss same with Receiver (.2) work on 7940 University sale motion (.9) discuss same with Receiver (.2)	Fates, Edward (Ted)	2.50	1,530.00	4,896.00	WO	HD	TR
10/07/20	8227371	Discuss revisions to 7940 University sale motion with Receiver (.3) work on revisions (.3) work on Receiver's declaration and proposed order (.8) discuss revisions to 812 San Rafael sale motion with Receiver (.6) work on same (.5) work on Receiver's declaration and proposed order (.9)	Fates, Edward (Ted)	3.40	2,080.80	6,976.80	WO	HD	TR
10/08/20	8228665	Communications with Receiver and court clerk re: concerns with timing of pending sale motions	Fates, Edward (Ted)	0.20	122.40	7,099.20	WO	HD	TR
10/09/20	8229764	Advise Receiver re: scheduling orders and timing for further sale motions	Fates, Edward (Ted)	0.10	61.20	7,160.40	WO	HD	TR
10/12/20	8231187	Discuss sale of Valle Vista property and title issues re: same with G. Rodriguez (.7) work on motion to approve sale and for authority over trust (1.7)	Fates, Edward (Ted)	2.40	1,468.80	8,629.20	WO	HD	TR
10/13/20	8232423	Communications with G. Rodriguez re: lack of overbids for Ocean Beach sale motion (.1) work on notice re: same (.3) work on Receiver's declaration and proposed order for Valle Vista sale motion (1.1) discuss same with Receiver (.2) communications	Fates, Edward (Ted)	2.10	1,285.20	9,914.40	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 with counsel for Champion-Cain re: proposed order for Valle Vista (.2) revise proposed order (.2)	Timekeeper	Hours	Fees	Sum	Circle Action			
10/14/20	8234016	Communications with counsel for Champiopr-Cain re: Valle Vista sale issues and title to property held in personal trust (.4) finalize sale motion papers (.2)	Fates, Edward (Ted)	0.60	367.20	10,281.60	WO	HD	TR	_____
10/15/20	8235299	Discuss issues re: purchase offer for 10th and J Street property and tax issues re: 10th and J entity with Receiver (.4) communications with counsel for First Choice Bank re: same (.2)	Fates, Edward (Ted)	0.60	367.20	10,648.80	WO	HD	TR	_____
10/16/20	8235756	Advise G. Rodriguez on issues with closing documents and mechanic's lien issues for University Ave. sale (.4) review orders approving Bella Pacific and University Ave. sales and advise Receiver and G. Rodriguez re: same (.4)	Fates, Edward (Ted)	0.80	489.60	11,138.40	WO	HD	TR	_____
10/19/20	8237753	Communications with G. Rodriguez and counsel for C. Riharb re: closing documents for 727 Windemere sale and release of Yarmouth lien (.6) advise Receiver re: issues relating to Valle Vista sale (.2)	Fates, Edward (Ted)	0.80	489.60	11,628.00	WO	HD	TR	_____
10/21/20	8239803	Review/analyze minute order re: Mission Beach Surf Rider sale motion and discuss same with Receiver and G. Rodriguez (.5) work on notice re: correct street numbers (.4)	Fates, Edward (Ted)	0.90	550.80	12,178.80	WO	HD	TR	_____
10/22/20	8241518	Review updated terms for 901 W. Washington Purchase and Sale Agreement.	Lorenzen, Jonathan	0.20	108.90	12,287.70	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			
10/22/20	8241573	Discuss proposed sale of Yarmouth Court property with G. Rodriguez (.3) initial work on sale motion (.2)	Fates, Edward (Ted)	0.50	306.00	12,593.70	WO	HD	TR	_____
10/23/20	8242277	Revise Purchase and Sale Agreement for 901 West Washington to reflect updated terms.	Lorenzen, Jonathan	1.90	1,034.55	13,628.25	WO	HD	TR	_____
10/23/20	8242372	Work on motion for approval of sale of 750 Yarmouth Court property (1.3) discuss same with Receiver and G. Rodriguez (.2) analyze dispute with Randolph Street tenant and advise G. Rodriguez re: same (.5) revise message to tenant re: same (.4)	Fates, Edward (Ted)	2.40	1,468.80	15,097.05	WO	HD	TR	_____
10/26/20	8243663	Prepare Purchase and Sale Agreement for 3792 Mission Blvd.	Lorenzen, Jonathan	2.20	1,197.90	16,294.95	WO	HD	TR	_____
10/26/20	8243750	Analyze MB Surf Rider sale approval order and advise Receiver re: same (.2) work on revisions to Yarmouth Court sale motion (.4)	Fates, Edward (Ted)	0.60	367.20	16,662.15	WO	HD	TR	_____
10/27/20	8244817	Analyze Ocean Beach Surf Rider sale approval order, advise Receiver re: same (.3) work on notice of non-receipt of overbids for Randolph Street sale (.3) work on Receiver's declaration in support of Yarmouth Court sale motion (.7) work on proposed order and notice of motion (.2)	Fates, Edward (Ted)	1.50	918.00	17,580.15	WO	HD	TR	_____
10/27/20	8245343	Prepare closing documents for Baskin Purchase and Sale Agreement (0.7); review executed Purchase and Sale Agreement for 3792 W. Mission, and update final version	Lorenzen, Jonathan	1.10	598.95	18,179.10	WO	HD	TR	_____

10/04/21 15:29:52 PROFORMA STATEMENT FOR MATTER 378827.00005 (Krista Freitag, as Receiver for ANI Deve) (SEC v. Champion-Cain - Operations & Asse)

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

Trans Date	Index	Description of Service Rendered for re-execution (0.4).	Timekeeper	Hours	Fees	Sum	Circle	Action	
10/29/20	8247662	Review Buyer's comments to Purchase and Sale Agreement for 901-915 W. Washington.	Lorenzen, Jonathan	0.40	217.80	18,396.90	WO	HD	TR
10/29/20	8248451	Review closing issues for Mission Beach Surf Rider.	Lorenzen, Jonathan	0.20	108.90	18,505.80	WO	HD	TR
10/30/20	8248992	Review leases for Surf Rider properties.	Lorenzen, Jonathan	0.50	272.25	18,778.05	WO	HD	TR
10/30/20	8249424	Discuss issues with Keller Co-work operations and compliance with COVID-related orders with Receiver (.3) advise on Windemere sale closing issues (.2)	Fates, Edward (Ted)	0.50	306.00	19,084.05	WO	HD	TR
11/02/20	8254402	Discuss potential overbid for 812 San Rafael property with G. Rodriguez (.2) analyze order approving Randolph Street sale, advise Receiver re: same (.2)	Fates, Edward (Ted)	0.40	244.80	19,328.85	WO	HD	TR
11/02/20	8254408	Review comments to Purchase and Sale Agreement for 901 W. Washington and prepare redraft (0.9); coordinate completion of closing documents for Surf Rider (0.9).	Lorenzen, Jonathan	1.80	980.10	20,308.95	WO	HD	TR
11/02/20	8265062	Begin preparing the closing documents for the sale of the Ocean Beach Surf Rider property to G Boys Holdings.	Thiels, Megan	0.70	258.30	20,567.25	WO	HD	TR
11/02/20	8280557	Analyze two sets of escrow instructions (1.5 hours each) for Mission Beach and San Diego Surf Rider Pizza.	Klinger, Warren	3.00	1,525.50	22,092.75	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			
11/03/20	8255081	Work on notice of overbid for 812 San Rafael Property (.3) work on notice re: no overbid for 7940 University property (.3) discuss same with Receiver (.2) discuss sale of Camino Degrazia property with G. Rodriguez (.2) initial work on sale approval motion (.3) analyze Spheremail contract terms for Keller co-work operations (.8)	Fates, Edward (Ted)	2.10	1,285.20	23,377.95	WO	HD	TR	_____
11/03/20	8255671	Review closing issues for Surf Rider properties.	Lorenzen, Jonathan	0.40	217.80	23,595.75	WO	HD	TR	_____
11/03/20	8265069	Continue preparing the closing documents for sale of the Ocean Beach Surf Rider property to G Boys Holdings.	Thiels, Megan	2.80	1,033.20	24,628.95	WO	HD	TR	_____
11/04/20	8256011	Review additional comments to Purchase and Sale Agreement for 901 W. Washington (0.3); review closing documents for Surf Rider Ocean Beach (0.3).	Lorenzen, Jonathan	0.60	326.70	24,955.65	WO	HD	TR	_____
11/04/20	8256301	Prepare settlement agreement with Randolph Street tenant re: utility charges/rent credit dispute (1.1) discuss same with G. Rodriguez (.2) revisions to auction instructions for 812 San Rafael (.5)	Fates, Edward (Ted)	1.80	1,101.60	26,057.25	WO	HD	TR	_____
11/04/20	8265080	Prepare clean and redline versions of the closing documents for the transaction to sell the Ocean Beach Surf Rider property to G Boys Holdings; correspond with the client re: such closing documents.	Thiels, Megan	0.40	147.60	26,204.85	WO	HD	TR	_____
11/05/20	8257184	Revise Purchase and Sale Agreement for 901 W. Washington pursuant to Buyer's	Lorenzen, Jonathan	0.70	381.15	26,586.00	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 comments.	Timekeeper	Hours	Fees	Sum	Circle	Action	
11/05/20	8257440	Work on motion for approval of sale of Camino Degrazia property (1.4) discuss same with G. Rodriguez (.3)	Fates, Edward (Ted)	1.70	1,040.40	27,626.40	WO	HD	TR _____
11/06/20	8258077	Attend remote auction for 812 San Rafael property (.4) discuss amendments to purchase contract and back up purchase contract with G. Rodriguez (.2)	Fates, Edward (Ted)	0.60	367.20	27,993.60	WO	HD	TR _____
11/06/20	8258089	Review executed version of Purchase and Sale Agreement for 901 W. Washington.	Lorenzen, Jonathan	0.20	108.90	28,102.50	WO	HD	TR _____
11/07/20	8258867	Review correspondence and status of transaction for 812 San Rafael.	Lorenzen, Jonathan	0.30	163.35	28,265.85	WO	HD	TR _____
11/09/20	8259330	Work on revisions to Camino Degrazia sale motion (.5) work on Receiver's declaration in support of motion, proposed order and notice of motion (.7)	Fates, Edward (Ted)	1.20	734.40	29,000.25	WO	HD	TR _____
11/09/20	8259979	Review Amendments to Purchase and Sale Agreement for 812 San Rafael.	Lorenzen, Jonathan	0.30	163.35	29,163.60	WO	HD	TR _____
11/09/20	8276681	Begin drafting the high bidder and backup bidder amendments to the applicable purchase and sale agreements for the property located at 812 San Rafael.	Thiels, Megan	0.90	332.10	29,495.70	WO	HD	TR _____
11/10/20	8260931	Work on notice of results of auction for 812 San Rafael property	Fates, Edward (Ted)	0.40	244.80	29,740.50	WO	HD	TR _____
11/11/20	8264028	Work on notice of results of auction for 812 San Rafael property (.4) discuss same with Receiver (.1) work on accounting of costs of	Fates, Edward (Ted)	1.30	795.60	30,536.10	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	
		sale for Windemere and University Ave. properties (.5) advise on closing issues for La Mesa Surf Rider property (.3)							
11/12/20	8263123	Advise Receiver and G. Rodriguez re: La Mesa sale closing issues and Surf Rider Pizza website (.4) discuss Hancock Street foreclosure sale date and deadline to vacate property with Receiver (.2) finalize notice of results of 812 San Rafael auction and exhibits (.3)	Fates, Edward (Ted)	0.90	550.80	31,086.90	WO	HD	TR
11/12/20	8265110	Begin drafting the purchase and sale agreement for 3816 Mission Blvd and 733 Salem Court with Mauricion Schwartzman.	Thiels, Megan	1.10	405.90	31,492.80	WO	HD	TR
11/13/20	8264642	Review terms of Purchase and Sale Agreement for 3816 Mission.	Lorenzen, Jonathan	0.30	163.35	31,656.15	WO	HD	TR
11/13/20	8265121	Prepare clean and redline versions of the purchase and sale agreement for 3816 Mission Blvd and 733 Salem Court with Mauricion Schwartzman; correspond with Geno Rodriguez re: such agreement.	Thiels, Megan	0.20	73.80	31,729.95	WO	HD	TR
11/16/20	8265475	Analyze and advise Receiver re: 7940 University Ave. sale approval order	Fates, Edward (Ted)	0.20	122.40	31,852.35	WO	HD	TR
11/17/20	8267071	Analyze info for 3792 Mission Blvd. sale approval motion (.2) work on motion (1.6) discuss same with G. Rodriguez (.3)	Fates, Edward (Ted)	2.10	1,285.20	33,137.55	WO	HD	TR
11/18/20	8268309	Work on declaration, notice of motion, and proposed order for 3792 Mission Blvd. sale motion (.9) discuss same with Receiver (.2)	Fates, Edward (Ted)	1.10	673.20	33,810.75	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	
11/23/20	8272038	Work on notice of non-receipt of overbids for Yarmouth Court sale (.3) discuss same with G. Rodriguez (.1) communications with Receiver and ANI outside IP counsel (.4)	Fates, Edward (Ted)	0.80	489.60	34,300.35	WO	HD	TR
11/24/20	8274595	Review comments to Purchase and Sale Agreement for 3816 Mission.	Lorenzen, Jonathan	0.60	326.70	34,627.05	WO	HD	TR
11/25/20	8274867	Analyze info for West Washington sale and work on sale approval motion (1.6) discuss same with G. Rodriguez (.2)	Fates, Edward (Ted)	1.80	1,101.60	35,728.65	WO	HD	TR
11/25/20	8276653	Review and analyze the Buyer's comments to the PSA with Mauricion Schwartzman for the property located at 3816 Mission Blvd and 733 Salem Court; attend telephone call with the client re: such comments.	Thiels, Megan	0.80	295.20	36,023.85	WO	HD	TR
11/29/20	8276637	Begin editing and revising the purchase and sale agreement with Mauricion Schwartzman for the property located at 3816 Mission Blvd and 733 Salem Court.	Thiels, Megan	1.10	405.90	36,429.75	WO	HD	TR
11/30/20	8277244	Review redraft of Purchase and Sale Agreement for 3816 Mission Blvd property.	Lorenzen, Jonathan	0.80	435.60	36,865.35	WO	HD	TR
11/30/20	8277284	Work on notice re: no overbids for Camino Degrazia (.3) communications with G. Rodriguez re: same (.1)	Fates, Edward (Ted)	0.40	244.80	37,110.15	WO	HD	TR
11/30/20	8279027	Prepare clean and redline versions of the revised purchase and sale agreement with Mauricion Schwartzman for the property located at 3816 Mission Blvd; correspond with the Mr. Geno Rodriguez re: such revised draft of the purchase and sale	Thiels, Megan	0.40	147.60	37,257.75	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 agreement.	Timekeeper	Hours	Fees	Sum	Circle	Action	
12/01/20	8281955	Work on Receiver declaration and proposed order for motion to approve sale of W. Washington property (1.1) discuss same with Receiver (.2)	Fates, Edward (Ted)	1.30	795.60	38,053.35	WO	HD	TR _____
12/02/20	8282852	Discuss West Washington sale motion and supporting declaration with Receiver (.2) finalize same (.3) communications with G. Rodriguez re: ANI office lease issues (.4)	Fates, Edward (Ted)	0.90	550.80	38,604.15	WO	HD	TR _____
12/02/20	8282901	Review Lease for 3816 Mission and revisions to Purchase and Sale Agreement.	Lorenzen, Jonathan	0.90	490.05	39,094.20	WO	HD	TR _____
12/02/20	8307253	Edit and revise the purchase and sale agreement with Mauricio Schwartzman for the property located at 3816 Mission Boulevard; correspond with the client re: such revised draft of the purchase and sale agreement; begin reviewing and analyzing the lease provided by the client for the commercial unit at 3816 Mission Boulevard.	Thiels, Megan	1.40	516.60	39,610.80	WO	HD	TR _____
12/03/20	8283601	Discuss ANI office-related lease issues with G. Rodriguez	Fates, Edward (Ted)	0.30	183.60	39,794.40	WO	HD	TR _____
12/03/20	8307271	Continue reviewing and analyzing the lease provided by the client for the commercial unit located at 3816 Mission Boulevard; begin drafting the addendum to such lease.	Thiels, Megan	3.90	1,439.10	41,233.50	WO	HD	TR _____
12/04/20	8284444	Analyze and revise addendum to ANI office lease	Fates, Edward (Ted)	0.40	244.80	41,478.30	WO	HD	TR _____

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Trans Date	Index	Description of Service Rendered	Timekeeper	Hours	Fees	Sum	Circle Action			
12/04/20	8284623	Review draft Lease for 3816 Mission and Addendum.	Lorenzen, Jonathan	0.90	490.05	41,968.35	WO	HD	TR	_____
12/04/20	8307297	Finish drafting the addendum to the lease for the commercial unit at 3816 Mission Boulevard; correspond with the client re: such addendum.	Thiels, Megan	0.60	221.40	42,189.75	WO	HD	TR	_____
12/07/20	8286521	Communication with Receiver and court clerk re: pending sale motions and timing concerns	Fates, Edward (Ted)	0.20	122.40	42,312.15	WO	HD	TR	_____
12/09/20	8288483	Review issues for Lease at 3816 Mission.	Lorenzen, Jonathan	0.20	108.90	42,421.05	WO	HD	TR	_____
12/09/20	8288966	Review Purchase and Sale Agreement for Keller Street property.	Lorenzen, Jonathan	0.60	326.70	42,747.75	WO	HD	TR	_____
12/10/20	8289388	Advise Receiver and G. Rodriguez re: order concerning authority over trust for purposes of Valle Vista sale (.2) communications with counsel for Champion-Cain re: same (.4) prepare notice of filing declaration (.2) discuss accountings of costs of sale for Bella Pacific, 7940 University, lease agreement Mesa Surf Rider and Randolph St. properties with Receiver (.2) work on same (.9) advise Receiver re: order approving sale of Yarmouth Court property (.2)	Fates, Edward (Ted)	2.10	1,285.20	44,032.95	WO	HD	TR	_____
12/10/20	8289431	Prepare updated Purchase and Sale Agreement for 140 Keller.	Lorenzen, Jonathan	2.20	1,197.90	45,230.85	WO	HD	TR	_____

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Trans Date	Index	Description of Service Rendered	Timekeeper	Hours	Fees	Sum	Circle	Action	
12/11/20	8290693	Advise Receiver re: order approving sale of Valle Vista property (.2) advise Receiver and G. Rodriguez re: order approving Camino Degrazia sale (.2)	Fates, Edward (Ted)	0.40	244.80	45,475.65	WO	HD	TR
12/14/20	8292635	Communications with G. Rodriguez re: lack of overbids for 3792 Mission Blvd. sale (.1) work on notice re: same (.2)	Fates, Edward (Ted)	0.30	183.60	45,659.25	WO	HD	TR
12/14/20	8292966	Review revisions to Lease and Purchase and Sale Agreement for 3816 Mission.	Lorenzen, Jonathan	0.80	435.60	46,094.85	WO	HD	TR
12/14/20	8307433	Edit and revise the addendum to the lease for the commercial unit located at 3816 Mission Boulevard; review and analyze the buyer's comments to the purchase and sale agreement with Mauricio Schwartzman for the property located at 3816 Mission Boulevard.	Thiels, Megan	2.60	959.40	47,054.25	WO	HD	TR
12/15/20	8293991	Review executed version of Purchase and Sale Agreement for Keller (0.4); review status update for 901-915 Washington property (0.2).	Lorenzen, Jonathan	0.60	326.70	47,380.95	WO	HD	TR
12/16/20	8295307	Review Overbid Purchase and Sale Agreement for West Washington property (0.5); review closing issues for 2163 Abbott Street (0.6).	Lorenzen, Jonathan	1.10	598.95	47,979.90	WO	HD	TR
12/16/20	8307453	Begin drafting the overbid purchase and sale agreement with the Mikhail Family Trust for the property located at 901-915 West Washington.	Thiels, Megan	1.10	405.90	48,385.80	WO	HD	TR

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Trans Date	Index	Description of Service Rendered	Timekeeper	Hours	Fees	Sum	Circle Action			
12/17/20	8296636	Communications with counsel for First Choice Bank re: Valle Vista sale closing	Fates, Edward (Ted)	0.20	122.40	48,508.20	WO	HD	TR	_____
12/17/20	8307469	Review and analyze the overbid purchase and sale agreement executed for the property located at 901-915 West Washington; correspond with the client re: such overbid purchase and sale agreement.	Thiels, Megan	0.30	110.70	48,618.90	WO	HD	TR	_____
12/18/20	8297766	Review correspondence regarding 3816 Mission.	Lorenzen, Jonathan	0.60	326.70	48,945.60	WO	HD	TR	_____
12/21/20	8299385	Communications with G. Rodriguez re: overbid for W. Washington sale and notice of same	Fates, Edward (Ted)	0.20	122.40	49,068.00	WO	HD	TR	_____
12/22/20	8300502	Discuss co-work operational issues with G. Rodriguez	Fates, Edward (Ted)	0.20	122.40	49,190.40	WO	HD	TR	_____
12/22/20	8300998	Review updated draft of Purchase and Sale transaction for 3816 Mission and related issues for the property.	Lorenzen, Jonathan	0.90	490.05	49,680.45	WO	HD	TR	_____
12/22/20	8309821	Edit and revise the purchase and sale agreement with Mauricio Schwartzman for the property located at 3816 Mission Boulevard pursuant to the client's comments.	Thiels, Megan	0.60	221.40	49,901.85	WO	HD	TR	_____
12/23/20	8301613	Call with G. Rodriguez and counsel re: Keller co-work operations and COVID-related orders (.3) advise Receiver and G. Rodriguez re: order approving 3792 Mission sale (.2) analyze and assist Receiver with response to media inquiry re: property sales (.6)	Fates, Edward (Ted)	1.10	673.20	50,575.05	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	
12/23/20	8301658	Finish editing and revising the purchase and sale agreement with Mauricio Schwartzman for the property located at 3816 Mission Boulevard; correspond with the client re: such revised draft of the agreement.	Thiels, Megan	0.60	221.40	50,796.45	WO	HD	TR
12/23/20	8301659	Review correspondence.	Lorenzen, Jonathan	0.20	108.90	50,905.35	WO	HD	TR
12/23/20	8301871	Prepare for and telephone conference with G. Rodriguez regarding Keller co-work in Petaluma and compliance with current state and local orders regarding COVID-19.	Bell, Melissa	0.60	267.30	51,172.65	WO	HD	TR
12/28/20	8303213	Attend auction for West Washington sale (.4) advise on issues re: amendments to purchase and sale agreements, communications with G. Rodriguez re: same (.3)	Fates, Edward (Ted)	0.70	428.40	51,601.05	WO	HD	TR
12/28/20	8303467	Review correspondence and issues related to Ocean Beach (0.8); revise Amendment to Lease for Surf Rider Ocean Beach (0.7).	Lorenzen, Jonathan	1.60	871.20	52,472.25	WO	HD	TR
12/28/20	8309828	Begin reviewing and analyzing Buyer's comments to the purchase and sale agreement for the property located at 3816 Mission Boulevard; correspond with the client re; such comments; prepare the high bidder and backup bidder amendments for the applicable purchase and sale agreements for the property located at 901-915 West Washington.	Thiels, Megan	1.40	516.60	52,988.85	WO	HD	TR

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Trans Date	Index	Description of Service Rendered	Timekeeper	Hours	Fees	Sum	Circle	Action	
12/29/20	8304434	Review Purchase Agreement issues for West Washington and 3816 Mission properties.	Lorenzen, Jonathan	0.50	272.25	53,261.10	WO	HD	TR
12/29/20	8304913	Review and analyze executed high bidder and backup bidder amendments for the property located at 901-915 West Washington; review and analyze the executed purchase and sale agreement with Mauricio Schwartzman for the property located at 3816 Mission Boulevard; correspond with the client re: such documents.	Thiels, Megan	0.90	332.10	53,593.20	WO	HD	TR
12/30/20	8305428	Work on notice of results of W. Washington auction and amended proposed order (.4) communications with Receiver and G. Rodriguez re: same (.2)	Fates, Edward (Ted)	0.60	367.20	53,960.40	WO	HD	TR
12/30/20	8305799	Review executed version of Purchase and Sale Agreement for Minden (0.3); review option extension requirements in Lease for Surf Rider OB and revise notice (0.4).	Lorenzen, Jonathan	0.70	381.15	54,341.55	WO	HD	TR
12/31/20	8306515	Review executed version of Purchase and Sale Agreement and status of water rights issues for Minden.	Lorenzen, Jonathan	0.60	326.70	54,668.25	WO	HD	TR

Proforma Summary

Timekeeper Number	Timekeeper	Hours	Rate	Amounts
001665	Fates, Edward (Ted)	51.10	612.00	31,273.20
002115	Lorenzen, Jonathan	24.90	544.50	13,558.05
002244	Bell, Melissa	0.60	445.50	267.30
002283	Klinger, Warren	3.00	508.50	1,525.50

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Proforma Summary

Timekeeper

Number	Timekeeper	Hours	Rate	Amounts
002306	Thiels, Megan	21.80	369.00	8,044.20
		101.40		\$54,668.25
Subtotal Fees				\$54,668.25
Discount				0.00
Total Fees				54,668.25
Total Disbursements				0.00

Attorney Billing Instructions

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

Billing Instructions

expires 6/30/2022: 10% off standard rates (automatic); no text editing; copies @ .10

Account Summary – As Of 10/04/21

	Fiscal YTD			Calendar YTD			LTD		
	Total	Fees	Disb.	Total	Fees	Disb.	Total	Fees	Disbursements
Worked	8,979.75	8,979.75	0.00	63,592.65	63,592.65	0.00	741,255.75	741,255.75	0.00
Unbilled Adj	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00
Billed	0.00	0.00	0.00	90,726.75	90,726.75	0.00	525,511.80	525,511.80	0.00
Collected	0.00	0.00	0.00	90,726.75	90,726.75	0.00	525,511.80	525,511.80	0.00
AR Write Off	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00
WIP	215,743.95	215,743.95	0.00						
Balance									
AR Balance	0.00	0.00	0.00						
Unalloc	0.00								
Payment									
Client Trust	0.00								
Balance									

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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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10/04/21 15:29:53 PROFORMA STATEMENT FOR MATTER 378827.00006 (Krista Freitag, as Receiver for ANI Deve) (SEC v. Champion-Cain - Claims & Distribu)

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: 04/20/21

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

Proforma Number: 1117633

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	
10/01/20	8223717	Communications with Receiver and W. Caldarelli re: payments to investors from CTC settlement and effect on investor claims (.6) assist Receiver with responses to inquiry from IRA administrator for investors (.2)	Fates, Edward (Ted)	0.80	489.60	489.60	WO	HD	TR
10/02/20	8225827	Call with counsel for TriCorp, Mr. Perrott, emails/calls with Mr. Perrott related to the "D" Stree claims of TriCorp and SFG/stipulation for relief from stay (.5). Review of the letter/email related to letter/lien claims and follow-up with the Receiver (.4).	Zaro, David	0.90	724.95	1,214.55	WO	HD	TR
10/05/20	8225547	Discuss investor question concerning K-1 statement with Receiver and S. Hoslett (.5) communications with counsel for investor re: same (.2) discuss 809 San Rafael financial data and request for same from J. Lance with Receiver (.2) draft correspondence to counsel for J. Lance re:	Fates, Edward (Ted)	1.10	673.20	1,887.75	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 same (.2)	Timekeeper	Hours	Fees	Sum	Circle	Action	
10/05/20	8226180	Review and forward Notice of Trustee's Sale for Lamont Street property.	Kaup, John	0.20	60.30	1,948.05	WO	HD	TR _____
10/06/20	8226214	Finalize correspondence to J. Lance re: financial data for 809 San Rafael	Fates, Edward (Ted)	0.20	122.40	2,070.45	WO	HD	TR _____
10/07/20	8229746	Call concerning the pending stipulation regarding "D" Street, follow-up on TriCorp letter request (.3). Emails to/from Receiver and counsel related to the proposal from developer (.3).	Zaro, David	0.60	483.30	2,553.75	WO	HD	TR _____
10/08/20	8229341	Review and forward duplicate notice of trustee's sale.	Kaup, John	0.10	30.15	2,583.90	WO	HD	TR _____
10/08/20	8229959	Several email with TriCorp counsel, follow-up with Receiver counsel and follow-up TriCorp (.4).	Zaro, David	0.40	322.20	2,906.10	WO	HD	TR _____
10/09/20	8232802	Call/email with counsel for TriCorp and Receiver related to D Street stipulation (.4). Follow-up on the filed stipulation/form of order/email to counsel for TriCorp (.3).	Zaro, David	0.70	563.85	3,469.95	WO	HD	TR _____
10/12/20	8232828	Emails concerning the stipulation related to D Street stipulation.	Zaro, David	0.40	322.20	3,792.15	WO	HD	TR _____
10/14/20	8233810	Respond to inquiries from investor re: claims process and related issues (.2) review court order and work on consent to jurisdiction of magistrate judge for Riharb settlement (.6) work on proposed order for joint motion (.3) communications with SEC counsel, counsel for Champion-Cain, and	Fates, Edward (Ted)	1.40	856.80	4,648.95	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	
		counsel for C. Riharb re: same (.3)							
10/14/20	8236123	Emails related to court order as to the D Street property lender/contractor claims (.3).	Zaro, David	0.30	241.65	4,890.60	WO	HD	TR _____
10/15/20	8234866	Communications with counsel for C. Riharb re: consent and proposed order (.2) revisions to proposed order on joint motion to approve settlement (.1) communications with SEC counsel and counsel for Champion-Cain re: same (.2) respond to inquiries from counsel for CalPrivate Bank (.2)	Fates, Edward (Ted)	0.70	428.40	5,319.00	WO	HD	TR _____
10/19/20	8237567	Communications with counsel for ANICO re: foreclosure sale for 3515 Hancock St. (.2) review order approving settlement regarding C. Riharb claims and advise Receiver re: same and next steps re: clearing title to Windemere and Yarmouth properties (.5)	Fates, Edward (Ted)	0.70	428.40	5,747.40	WO	HD	TR _____
10/20/20	8238549	Communications with G. Rodriguez and counsel for C. Riharb re: execution of documents relating to release of Yarmouth lien (.4) communications with G. Rodriguez re: contractor mechanic's liens re: University Ave. and other properties and release of same (.5) address issues re: mechanic's lien releases (.3) respond to inquiry from investor (.4)	Fates, Edward (Ted)	1.60	979.20	6,726.60	WO	HD	TR _____
10/21/20	8239979	Analyze and advise on releases for mechanic's lien claims, discuss same with G. Rodriguez (.4) communications with G.	Fates, Edward (Ted)	0.90	550.80	7,277.40	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	
		Rodriguez and counsel for C. Riharb re: reconveyance for Yarmouth property (.5)							
10/21/20	8252829	Review mechanic lien release form and complete the same for various mechanics' liens (.8).	Aspis, Norman	0.80	356.40	7,633.80	WO	HD	TR _____
10/22/20	8241217	Communications with Receiver, G. Rodriguez and counsel for C. Rihard re: zero demand and reconveyance documents required to clear title to Windemere and Yarmouth properties	Fates, Edward (Ted)	1.10	673.20	8,307.00	WO	HD	TR _____
10/22/20	8241969	Review and forward property tax bill for Rancho Mirage property.	Kaup, John	0.20	60.30	8,367.30	WO	HD	TR _____
10/26/20	8246737	Review several emails and call regarding D Street claims status and call with Receiver.	Zaro, David	0.30	241.65	8,608.95	WO	HD	TR _____
10/27/20	8244861	Discuss removal of C. Riharb liens from Windemere and Yarmouth properties and settlement payment with Receiver and G. Rodriguez (.4) communications with counsel for C. Riharb re: settlement payment (.3) communications with G. Rodriguez re: mechanic's lien releases (.2) communications with W. Caldarelli re: investor payment schedule from CTC settlement funds (.2)	Fates, Edward (Ted)	1.10	673.20	9,282.15	WO	HD	TR _____
10/29/20	8247873	Analyze report re: distribution of CTC settlement funds to Caldarelli claimants, advise Receiver re: same	Fates, Edward (Ted)	0.20	122.40	9,404.55	WO	HD	TR _____
10/30/20	8248938	Review complaint filed by American Express and advise on next steps re:	Fates, Edward (Ted)	0.60	367.20	9,771.75	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			
		litigation stay (.4) advise Receiver re: same (.2)								
10/30/20	8252231	Research and forward new state court complaint against Luv Surf Brands and review and respond to related emails.	Kaup, John	0.20	60.30	9,832.05	WO	HD	TR	_____
11/03/20	8255232	Advise on issues re: American Express action against Luv Surf Brands	Fates, Edward (Ted)	0.20	122.40	9,954.45	WO	HD	TR	_____
11/03/20	8281763	Confer with counsel regarding dismissal of action against Luv Surf (.5).	Aspis, Norman	0.50	222.75	10,177.20	WO	HD	TR	_____
11/05/20	8257264	Advise Receiver re: foreclosure sale issues for W. Washington property and creditor claim issue re: insurance broker	Fates, Edward (Ted)	0.40	244.80	10,422.00	WO	HD	TR	_____
11/16/20	8265577	Communications with counsel for Champion-Cain re: lawsuit by attorney creditor in Colorado and potential resolution of same	Fates, Edward (Ted)	0.50	306.00	10,728.00	WO	HD	TR	_____
11/18/20	8268116	Call with counsel for Champion-Cain re: lawsuit by attorney creditor in Colorado and potential resolution of same	Fates, Edward (Ted)	0.20	122.40	10,850.40	WO	HD	TR	_____
11/19/20	8273997	Address email/complaint received from counsel for TriCorp concerning service of process, draft email regarding advice to Receiver as to approach to TriCorp lawsuit.	Zaro, David	0.60	483.30	11,333.70	WO	HD	TR	_____
11/25/20	8278127	Emails regarding the TriCorp matter and litigation approach.	Zaro, David	0.40	322.20	11,655.90	WO	HD	TR	_____
11/30/20	8277519	Advise Receiver re: lender's notice of foreclosure sale for 10th and J Street	Fates, Edward (Ted)	0.20	122.40	11,778.30	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 property	Timekeeper	Hours	Fees	Sum	Circle	Action	
11/30/20	8279875	Review and forward duplicate notices of trustee's sale for Tenth and J property.	Kaup, John	0.20	60.30	11,838.60	WO	HD	TR _____
12/02/20	8282831	Communications with counsel for C. Torres re: claims asserted by American Express in state court action and related issues	Fates, Edward (Ted)	0.50	306.00	12,144.60	WO	HD	TR _____
12/02/20	8284858	Call/email to respond to the Keller property lien claimant.	Zaro, David	0.30	241.65	12,386.25	WO	HD	TR _____
12/03/20	8284863	Calls with counsel and Receiver related to the Keller property sale and lien claims (.2).	Zaro, David	0.20	161.10	12,547.35	WO	HD	TR _____
12/09/20	8288585	Analyze and advise receiver re: Notice of Default recorded as to 301 D Street project	Fates, Edward (Ted)	0.20	122.40	12,669.75	WO	HD	TR _____
12/09/20	8289328	Review and forward notices of default for 301 D Street property.	Kaup, John	0.20	60.30	12,730.05	WO	HD	TR _____
12/09/20	8289857	Review of the email, Notices of Default, the related recorded documents from SFG as to D Street, follow-up emails with Receiver/counsel.	Zaro, David	0.40	322.20	13,052.25	WO	HD	TR _____
12/11/20	8291191	Analyze and discuss issues re: Futuristech claim with Receiver	Fates, Edward (Ted)	0.30	183.60	13,235.85	WO	HD	TR _____
12/14/20	8295591	Several emails with Tricorp counsel concerning the Tricorp lawsuit and foreclosure (.3). Call with the Receiver related to the TriCorp case and the SFG NOD (.1).	Zaro, David	0.40	322.20	13,558.05	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	
12/15/20	8296613	Follow-up with Mr. Perrott as to the TriCorp lawsuit and address Receiver response, court order related to state court status conference.	Zaro, David	0.30	241.65	13,799.70	WO	HD	TR
12/17/20	8296711	Communications with civil litigation counsel for Champion-Cain re: Colorado lawsuit filed by former ANI lawyer and settlement of same	Fates, Edward (Ted)	0.20	122.40	13,922.10	WO	HD	TR
12/17/20	8297300	Follow-up with the Receiver counsel as to TriCorp lawsuit, impact of non-appearance, review local rules as to CMC/non-appearance.	Zaro, David	0.30	241.65	14,163.75	WO	HD	TR
12/18/20	8297470	Analyze W. Bemis response to claims motion and advise Receiver re: same	Fates, Edward (Ted)	0.40	244.80	14,408.55	WO	HD	TR
12/18/20	8301987	Evaluate the first amended complaint received from TriCorp related to D Street, case management conference rules, assess Receiver's options concerning response, impact of default, prayer for relief.	Zaro, David	0.70	563.85	14,972.40	WO	HD	TR
12/21/20	8299535	Analyze opposition to claims motion from Amandus and advise Receiver re: same	Fates, Edward (Ted)	0.70	428.40	15,400.80	WO	HD	TR
12/29/20	8304097	Analyze issues re: proposed joint motion from CTC counsel re: investor settlements	Fates, Edward (Ted)	0.30	183.60	15,584.40	WO	HD	TR

Proforma Summary

Timekeeper Number	Timekeeper	Hours	Rate	Amounts
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Proforma Summary

Timekeeper

Number	Timekeeper	Hours	Rate	Amounts
000313	Zaro, David	7.20	805.50	5,799.60
000820	Kaup, John	1.10	301.50	331.65
001665	Fates, Edward (Ted)	14.50	612.00	8,874.00
002369	Aspis, Norman	1.30	445.50	579.15
		24.10		\$15,584.40
Subtotal Fees				\$15,584.40
Discount				0.00
Total Fees				15,584.40
Total Disbursements				0.00

Attorney Billing Instructions

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

Billing Instructions

expires 6/30/2022: 10% off standard rates (automatic); no text editing; copies @ .10

Account Summary – As Of 10/04/21

	Fiscal YTD			Calendar YTD			LTD		
	Total	Fees	Disb.	Total	Fees	Disb.	Total	Fees	Disbursements
Worked	5,186.70	5,186.70	0.00	63,681.30	63,681.30	0.00	358,041.60	358,041.60	0.00
Unbilled Adj	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00
Billed	0.00	0.00	0.00	59,022.00	59,022.00	0.00	246,966.75	246,966.75	0.00
Collected	0.00	0.00	0.00	59,022.00	59,022.00	0.00	246,966.75	246,966.75	0.00
AR Write Off	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00
WIP	111,074.85	111,074.85	0.00						
Balance									
AR Balance	0.00	0.00	0.00						
Unalloc	0.00								
Payment									

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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

}

10/04/21 15:29:57 PROFORMA STATEMENT FOR MATTER 378827.00008 (Krista Freitag, as Receiver for ANI Deve) (SEC v. Champion-Cain - Pending Litigation)

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: 04/20/21

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

Proforma Number: 1117633

Client/Matter Joint Group # 378827-1

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

Trans Date	Index	Description of Service Rendered	Timekeeper	Hours	Fees	Sum	Circle	Action	
12/02/20	8282577	Analyze update from local counsel in FL re: SunTrust matter and potential mediation, communications with Receiver and local counsel re: same	Fates, Edward (Ted)	0.60	367.20	367.20	WO	HD	TR
12/08/20	8287600	Communications with Receiver and local counsel in FL re: SunTrust matter	Fates, Edward (Ted)	0.20	122.40	489.60	WO	HD	TR
12/11/20	8290841	Call with Receiver and local counsel in FL re: strategy for SunTrust case and potential mediation	Fates, Edward (Ted)	0.50	306.00	795.60	WO	HD	TR
12/14/20	8295596	Evaluate the status of the pending Suntrust case, confer with counsel as to prospective settlement strategy.	Zaro, David	0.30	241.65	1,037.25	WO	HD	TR
12/15/20	8293870	Communications with Receiver and local counsel in FL re: expert fees	Fates, Edward (Ted)	0.20	122.40	1,159.65	WO	HD	TR

Proforma Summary

10/04/21 15:29:57 PROFORMA STATEMENT FOR MATTER 378827.00008 (Krista Freitag, as Receiver for ANI Deve) (SEC v. Champion-Cain - Pending Litigation)

Timekeeper

Number	Timekeeper	Hours	Rate	Amounts
000313	Zaro, David	0.30	805.50	241.65
001665	Fates, Edward (Ted)	1.50	612.00	918.00
		<u>1.80</u>		<u>\$1,159.65</u>
Subtotal Fees				\$1,159.65
Discount				0.00
Total Fees				1,159.65
Total Disbursements				0.00

Attorney Billing Instructions

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

Billing Instructions

expires 6/30/2022: 10% off standard rates (automatic); no text editing; copies @ .10

Account Summary – As Of 10/04/21

	Fiscal YTD			Calendar YTD			LTD		
	Total	Fees	Disb.	Total	Fees	Disb.	Total	Fees	Disbursements
Worked	11,904.75	11,904.75	0.00	17,362.80	17,362.80	0.00	48,800.70	48,800.70	0.00
Unbilled Adj	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00
Billed	0.00	0.00	0.00	3,325.05	3,325.05	0.00	28,319.85	28,319.85	0.00
Collected	0.00	0.00	0.00	3,325.05	3,325.05	0.00	28,319.85	28,319.85	0.00
AR Write Off	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00
WIP	20,480.85	20,480.85	0.00						
Balance									
AR Balance	0.00	0.00	0.00						
Unalloc	0.00								
Payment									
Client Trust	0.00								
Balance									

10/04/21 15:29:57 PROFORMA STATEMENT FOR MATTER 378827.00008 (Krista Freitag, as Receiver for ANI Deve) (SEC v. Champion-Cain - Pending Litigatio)

Billing Address

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