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13 KRISTA L. FREITAG

14 UNITED STATES DISTRICT COURT
15 SOUTHERN DISTRICT OF CALIFORNIA
16

17 SECURITIES AND EXCHANGE
COMMISSION,

18 Plaintiff,

19 v.

20 GINA CHAMPION-CAIN and ANI
21 DEVELOPMENT, LLC,

22 Defendants,

23 AMERICAN NATIONAL
24 INVESTMENTS, INC.,

25 Relief Defendant.

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

**EIGHTH 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: October 24, 2022
Time: 11:30 a.m.
Courtroom: 14A
Judge: Hon. Larry A. Burns

TABLE OF CONTENTS

		<u>Page</u>
1		
2		
3	I. INTRODUCTION	4
4	II. SUMMARY OF TASKS PERFORMED AND COSTS	
5	INCURRED.....	6
6	A. Categories and Descriptions of Work	6
7	1. General Receivership.....	6
8	2. Asset Investigation & Recovery	6
9	3. Reporting	6
10	4. Operations & Asset Sales	7
11	5. Claims & Distributions	7
12	6. Third Party Recoveries	7
13	7. Pending Litigation	8
14	8. Employment/Professional Fees	8
15	9. General Clawback Claims & Settlements	8
16	10. Claims Against Kim Peterson.....	9
17	A. Summary of Expenses Requested for Reimbursement.....	9
18	II. THE FEES AND COSTS ARE REASONABLE AND SHOULD	
19	BE ALLOWED	10
20	III. CONCLUSION	12
21		
22		
23		
24		
25		
26		
27		
28		

TABLE OF AUTHORITIES**Page(s)****Cases**

<i>Gaskill v. Gordon</i> , 27 F.3d 248 (7th Cir. 1994).....	10
<i>In re Imperial 400 Nat'l, Inc.</i> , 432 F.2d 232 (3d Cir. 1970).....	10
<i>SEC v. Elliot</i> , 953 F.2d 1560 (11th Cir. 1992).....	10
<i>SEC v. W.L. Moody & Co., Bankers (Unincorporated)</i> , 374 F. Supp. 465 (S.D. Tex. 1974)	10
<i>United States v. Code Prods. Corp.</i> , 362 F. 2d 669 (3d Cir. 1966).....	10

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 Eighth Interim Application for Payment of Fees and Reimbursement of
 6 Expenses (the "Application"). This Application covers the six-month period from
 7 July 1, 2021 through December 31, 2021 (the "Application Period"), and seeks
 8 approval of \$777,805.65 in fees and \$70,651.87 in expenses, and an order
 9 authorizing the Receiver to pay, on an interim basis, 80% of the fees incurred
 10 (\$622,244.52) and 100% of the expenses incurred (\$70,651.87).

11 The Receiver and Allen Matkins have previously filed fee applications on a
 12 quarterly basis. This fee application, however, covers a *six-month period* in order
 13 to catch up a bit, such that, going forward, fee applications can be reviewed closer in
 14 time to when the work they cover was actually performed.

15 **I. INTRODUCTION.**

16 This equity receivership involves a large, complex, and wide-ranging group
 17 of enterprises and assets associated with the Ponzi scheme that is the subject of the
 18 Complaint filed by the Securities and Exchange Commission. The Receiver was
 19 appointed on September 3, 2019. Dkt. 6.

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

Receiver engaged Allen Matkins to assist with legal issues facing the receivership estate.

This Application should be read in conjunction with the Receiver's Ninth and Tenth Interim Reports and Recommendations, filed on November 15, 2021 and February 24, 2022 (Dkt. 729, 755), which describe in detail the Receiver's activities during the six-month Application Period.

This Application seeks approval of \$777,805.65 in fees for a total of 1,265.40 hours worked, and payment on an interim basis of 80% of that amount, or \$622,244.52. 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	2.90	\$1,800.45
Asset Investigation & Recovery	30.20	\$23,186.25
Reporting	5.30	\$3,623.40
Operations & Asset Sales	18.80	\$9,494.55
Claims & Distributions	61.90	\$40,358.70
Third Party Recoveries	459.20	\$304,151.40
Pending Litigation	32.80	\$21,184.20
Employment/Professional Fees	2.70	\$1,737.45
General Clawback Claims & Settlements	488.30	\$257,773.50
Claims Against Kim Peterson et al.	163.30	\$114,495.75
Total Fees	1,265.40	\$777,805.65

Allen Matkins' work has allowed the Receiver to preserve and protect the substantial value of receivership estate assets. Because the firm has worked

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 diligently and efficiently to assist the Receiver in carrying out her Court-ordered
2 duties, it should be compensated on an interim basis for its work.

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

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

5 1. General Receivership.

6 Allen Matkins' work in this category relates to the related criminal case,
7 including communications with the United States Attorney's Office and counsel for
8 Gina Champion-Cain ("GCC") regarding restitution issues. The reasonable and
9 necessary fees for Allen Matkins' work in this category total \$1,800.45.

10 2. Asset Investigation & Recovery.

11 The services in this category relate generally to efforts to identify, secure,
12 preserve, investigate and recover receivership assets. During the Application
13 Period, these services focused on (a) securing a settlement of the insurance claim
14 against the crime/theft insurance policy, (b) analyzing investments and loans made
15 by the Receivership Entities and strategies for maximizing recovery from such
16 assets, and (c) obtaining documents from third parties relevant to the Receiver's
17 investigation and analysis. The reasonable and necessary fees for Allen Matkins'
18 work in this category total \$23,186.25.

19 3. Reporting.

20 Allen Matkins' services in this category include assisting in preparing the
21 Receiver's Eighth and Ninth Interim Reports and Recommendations, which were
22 filed on August 20, 2021 and November 15, 2021, respectively. Dkt. 699, 729. The
23 reports includes detailed summaries of the Receiver's activities, funds recovered,
24 real and personal property assets, restaurant and retail operations, property taxes,
25 insurance, debt service, loans and other investments, investigation of third party
26 claims, pending litigation, and other matters. The reports also detail the receipts and
27 disbursements for the receivership estate since the Receiver's appointment and
28 provides her recommendations for the continued administration of the receivership.

1 The reasonable and necessary fees for Allen Matkins' work in this category total
2 \$3,623.40.

3 4. Operations & Asset Sales.

4 Allen Matkins' work in this category focused on sales of assets, including the
5 approved sale of real property located at 1775 Diamond Street and a liquor license.
6 The reasonable and necessary fees for Allen Matkins' work in this category total
7 \$9,494.55.

8 5. Claims & Distributions.

9 Services rendered in this category generally relate to the claims and interests
10 of investors and creditors of the Receivership Entities. During the Application
11 Period, this work focused on assisting and advising the Receiver in implementing
12 the Court-approved claims process, including preparing notices and instructions for
13 submitting claims, advising on and addressing various unique issues relating to
14 investor and creditor claims, and gathering information from counsel for investors
15 and counsel for Chicago Title regarding settlement payments made to investors on
16 account of their losses from the Ponzi scheme.

17 Allen Matkins also assisted with issues related to disseminating information
18 about the receivership to investors and creditors, including information provided on
19 the receivership website (www.anireceivership.com). The firm also assisted in
20 responding to direct inquiries from investors and creditors. The reasonable and
21 necessary fees for Allen Matkins' work in this category total \$40,358.70.

22 6. Third Party Recoveries.

23 This portion of the Application pertains to work on potential claims against
24 third parties to recover amounts for the benefit of the receivership estate. Due to the
25 confidential nature of the legal work on these matters and the Receiver's litigation
26 strategy vis-à-vis third parties, the Receiver has filed a motion concurrently herewith
27 to file this portion of the Application under seal. The reasonable and necessary fees
28 for Allen Matkins' work in this category total \$304,151.40.

1 7. Pending Litigation.

2 Services performed in this category include the analysis and management of
 3 pending pre-receivership actions in which one or more of the Receivership Entities
 4 are parties. Specifically, work within this category was largely devoted to the action
 5 pending in Florida state court known as *Westlink Dev. Co., LLC v. SunTrust Bank*,
 6 Pensacola, FL Cir. Ct. Case No. 13-008139-CI, in which Westlink Development,
 7 LLC (a Receivership Entity) and other co-plaintiffs have asserted claims against
 8 SunTrust Bank for aiding and abetting a multi-million dollar Ponzi scheme allegedly
 9 orchestrated by John Condo (separate from the alleged Ponzi scheme in this action).
 10 This action was settled in January 2022 with approval from the Court. Dkt. 740.

11 Allen Matkins also assisted with issues relating to the action pending in San
 12 Diego Superior Court known as *Luu v. The Patio Restaurant Grp., LLC, et al.*, San
 13 Diego Super. Ct. Case No. 37-2019-00015451-CU-OE-CTL, which is a putative
 14 class action filed by a former employee (which action is now stayed pursuant to the
 15 litigation stay in the Appointment Order). The reasonable and necessary fees for
 16 Allen Matkins' work in this category total \$21,184.20.

17 8. Employment/Professional Fees

18 Although fee applications are a necessary component of federal equity
 19 receiverships, neither the Receiver nor her professionals charge for time spent
 20 preparing their own detailed applications. Allen Matkins assisted in preparing the
 21 Receiver's Fifth Interim Fee Application and with meet and confer communications
 22 with counsel for the Commission. The fee applications were filed on October 13,
 23 2021 (Dkt. 711, 712) and approved on April 25, 2022. (Dkt. 771, 772). The
 24 reasonable and necessary fees for Allen Matkins' work in this category total
 25 \$1,737.45.

26 9. General Clawback Claims & Settlements.

27 This portion of the Application pertains to work on potential clawback claims
 28 and settlements against third parties to recover amounts for the benefit of the

1 receivership estate. Due to the confidential nature of the legal work on these matters
 2 and the Receiver's litigation strategy vis-à-vis third parties, the Receiver has filed a
 3 motion concurrently herewith to file this portion of the Application under seal. The
 4 reasonable and necessary fees for Allen Matkins' work in this category total
 5 \$257,773.50.

6 10. Claims Against Kim Peterson.

7 This portion of the Application pertains to work on claims against Kim
 8 Peterson and his entities to recover amounts for the benefit of the receivership
 9 estate. Due to the confidential nature of the legal work on this matters and the
 10 Receiver's litigation strategy vis-à-vis third parties, the Receiver has filed a motion
 11 concurrently herewith to file this portion of the Application under seal. The
 12 reasonable and necessary fees for Allen Matkins' work in this category total
 13 \$114,495.75.

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

15 Allen Matkins requests that the Court approve reimbursement of \$70,651.87
 16 in out-of-pocket costs. The itemization of such expenses is summarized below by
 17 billing category.

Category	Total
Deposition/Court Transcript Fees	\$49,070.55
Messenger/FedEx Fees	\$268.15
Service of Process	\$1,638.07
Court/Filing Fees	\$5,159.00
Duplication	\$269.90
PACER/Document Research	\$317.55
E-Discovery	\$13,928.65
Total	\$70,651.87

1 **II. THE FEES AND COSTS ARE REASONABLE AND SHOULD BE**
 2 **ALLOWED.**

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

10 In allowing fees, a court should consider "the time, labor and skill required,
 11 but not necessarily that actually expended, in the proper performance of the duties
 12 imposed by the court upon the receiver . . . , the fair value of such time, labor and
 13 skill measured by conservative business standards, the degree of activity, integrity
 14 and dispatch with which the work is conducted and the result obtained." *United*
 15 *States v. Code Prods. Corp.*, 362 F. 2d 669, 673 (3d Cir. 1966) (internal quotation
 16 marks omitted). In practical terms, receiver and professional compensation thus
 17 ultimately rests upon the result of an equitable, multi-factor balancing test involving
 18 the "economy of administration, the burden that the estate may be able to bear, the
 19 amount of time required, although not necessarily expended, and the overall value of
 20 the services to the estate." *In re Imperial 400 Nat'l, Inc.*, 432 F.2d 232, 237 (3d Cir.
 21 1970). Regardless of how this balancing test is formulated, no single factor is
 22 determinative and "a reasonable fee is based [upon] all circumstances surrounding
 23 the receivership." *SEC v. W.L. Moody & Co., Bankers (Unincorporated)*, 374 F.
 24 Supp. 465, 480 (S.D. Tex. 1974).

25 As a preliminary matter, the Appointment Order confers on the Receiver
 26 substantial duties and powers, including to conduct such investigation and discovery
 27 as may be necessary to locate and account for all Receivership Assets, to take such
 28 action as is necessary and appropriate to assume control over and preserve

1 Receivership Assets, and to employ attorneys and others to investigate and, where
2 appropriate, institute, pursue, and prosecute all claims and causes of action of
3 whatever kind and nature. *See* Appointment Order, Section X.

4 The Receiver promptly determined that experienced, qualified counsel was
5 necessary due to the size and complexity of the receivership estate and the Court
6 agreed, approving Allen Matkins' employment, initially on a provisional basis and
7 then on a non-provisional basis. Dkt. 126, 309. The Court also previously approved
8 the Receiver's proposal to file interim reports and fee applications on a quarterly
9 basis. Dkt. 126. As noted above, this interim application covers two quarters of
10 work.

11 Allen Matkins has submitted a detailed fee application which describes the
12 nature of the services rendered. *See* **Exhibit A**. Allen Matkins has endeavored to
13 staff matters as efficiently as possible while remaining cognizant of the complexity
14 of issues presented. As noted above, the request for fees is based on Allen Matkins'
15 customary billing rates charged for comparable services provided in other matters,
16 less a 10% discount. Moreover, Allen Matkins wrote off and did not charge for
17 6.4 hours of work (\$3,820.05 in fees).

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

28

1 **III. CONCLUSION.**

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

- 3 1. Approving Allen Matkins' fees of \$777,805.65;
- 4 2. Authorizing and directing the Receiver to pay 80% of approved fees, or
- 5 \$622,244.52, from the assets of the Receivership Entities;
- 6 3. Approving Allen Matkins' costs in the amount of \$70,651.87, and
- 7 authorizing and directing the Receiver to reimburse such costs in full; and
- 8 4. For such other and further relief as the Court deems appropriate.
- 9

10 Dated: September 20, 2022

ALLEN MATKINS LECK GAMBLE
MALLORY & NATSIS LLP

11
12 By: s/Edward G. Fates

13 DAVID R. ZARO
14 EDWARD G. FATES
15 MATTHEW D. PHAM
16 Attorneys for Receiver
17 KRISTA FREITAG
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EXHIBIT INDEX

EXHIBIT NO.	DESCRIPTION	PAGE NO.
Exhibit A	Detailed Descriptions of Services Rendered	14

EXHIBIT A

EXHIBIT A

09/15/22 09:31:11 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: 05/17/22

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

Proforma Number: 1180576

Client/Matter Joint Group # 378827-1

Client Matter Number:

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

Trans Date	Index	Description of Service Rendered	Timekeeper	Hours	Fees	Sum	Circle	Action	
07/23/21	8513775	Advise Receiver re: response to media inquiry concerning G. Champion-Cain	Fates, Edward (Ted)	0.20	128.70	128.70	WO	HD	TR
09/02/21	8558258	Discuss inquiries from AUSA with Receiver (.2) respond to same (.3)	Fates, Edward (Ted)	0.50	321.75	450.45	WO	HD	TR
09/08/21	8561389	Call with AUSA re: criminal restitution issues and timing of receivership claims process	Fates, Edward (Ted)	0.30	193.05	643.50	WO	HD	TR
10/26/21	8614329	Respond to inquiries from AUSA regarding deposition transcripts, related documents, and discovery (.5) discuss same with Receiver (.1)	Fates, Edward (Ted)	0.60	386.10	1,029.60	WO	HD	TR
10/28/21	8615581	Respond to further inquiries from AUSA regarding deposition transcripts, related documents, and discovery issues	Fates, Edward (Ted)	0.40	257.40	1,287.00	WO	HD	TR
11/01/21	8621867	Review and respond to emails regarding returned fee application document.	Kaup, John	0.20	63.00	1,350.00	WO	HD	TR
11/02/21	8622269	Respond to inquiries from AUSA regarding depositions and related documents	Fates, Edward (Ted)	0.30	193.05	1,543.05	WO	HD	TR

09/15/22 09:31:11 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			
12/02/21	8653912	Respond to inquiry from AUSA relating to criminal investigation	Fates, Edward (Ted)	0.20	128.70	1,671.75	WO	HD	TR	_____
12/28/21	8676348	Respond to inquiry from AUSA relating to criminal restitution and receivership claims process	Fates, Edward (Ted)	0.20	128.70	1,800.45	WO	HD	TR	_____

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

Trans Date	Index	Type	Quantity	Amt	Circle Action			
07/01/21	2721590	BW – Duplication - Black & White Copies	94.00	9.40	WO	HD	TR	_____
07/01/21	2723183	MSNGR – Federal Express - Ship To: American National Investments,	0.00	13.93	WO	HD	TR	_____
07/01/21	2723882	EDISC – CS Disco, Inc. - Monthly Hosting for July 2021	0.00	2,342.91	WO	HD	TR	_____
07/08/21	2722255	BW – Duplication - Black & White Copies	4.00	0.40	WO	HD	TR	_____
07/09/21	2724035	COURT – -Los Angeles Superior Court,Obtain copy of Request for Dismissal from Court's Docket.	0.00	2.00	WO	HD	TR	_____
07/16/21	2722999	BW – Duplication - Black & White Copies	8.00	0.80	WO	HD	TR	_____
07/16/21	2723051	DEPO – Veritext, LLC - Deposition Transcript of Laura Dalton Taken on 06/30/2021	0.00	1,260.45	WO	HD	TR	_____
07/16/21	2724038	COURT – -San Diego Superior Court,Obtain copy of June 25, 2021 Minute Order from Court's docket.	0.00	2.00	WO	HD	TR	_____
07/16/21	2724039	COURT – -San Diego Superior Court,Obtain copy of July 13, 2021 Request for Dismissal from Court docket.	0.00	2.00	WO	HD	TR	_____
07/19/21	2723279	BW – Duplication - Black & White Copies	144.00	14.40	WO	HD	TR	_____
07/20/21	2723375	BW – Duplication - Black & White Copies	49.00	4.90	WO	HD	TR	_____

09/15/22 09:31:11 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				
07/21/21	2725048	MSNGR – Federal Express - Ship To: Tracey Huntington	0.00	13.95	WO	HD	TR	_____
07/21/21	2729282	DCSRCH – Document Research - First Legal LLC - USDC-San Diego; ORDER GRANTING RECEIVER'S MOTION; Advance \$15.00	0.00	53.00	WO	HD	TR	_____
07/23/21	2728030	COURT – -San Diego Superior Court,Obtain copy of Request for Dismissal from Court docket.	0.00	6.60	WO	HD	TR	_____
07/24/21	2724258	DEPO – Veritext, LLC - Deposition Transcript of Karen Drew Taken on 07/24/2021	0.00	1,510.45	WO	HD	TR	_____
07/26/21	2724356	BW – Duplication - Black & White Copies	4.00	0.40	WO	HD	TR	_____
07/27/21	2724747	DEPO – Veritext, LLC - Deposition Transcript of Steve Cusato , Vol. 2 Taken on 07/20/2021	0.00	2,253.75	WO	HD	TR	_____
07/27/21	2727333	MSNGR – Federal Express - Ship To: c o E3 Realty Advisors, Inc	0.00	13.95	WO	HD	TR	_____
07/28/21	2724833	DEPO – Veritext, LLC - Deposition Transcript of Seth Moldoff Taken on 06/29/2021	0.00	1,123.00	WO	HD	TR	_____
07/30/21	2728032	COURT – -San Diego Superior Court,Obtain copy of July 27, 2021 Minute Order from Court docket.	0.00	1.00	WO	HD	TR	_____
08/01/21	2727590	EDISC – CS Disco, Inc. - Monthly Hosting for August 2021	0.00	2,342.91	WO	HD	TR	_____
08/09/21	2728037	COURT – -San Diego Superior Court,Obtain copy of August 4, 2021 Minute Order from Court docket.	0.00	5.00	WO	HD	TR	_____
08/15/21	2728021	DEPO – Veritext, LLC - Deposition Transcript of Polly Yu and Yuan Yu Taken on 08/09/2021	0.00	1,976.95	WO	HD	TR	_____
08/15/21	2728022	DEPO – Veritext, LLC - Deposition Transcript of Randolph L Levin Taken on 07/29/2021	0.00	1,276.05	WO	HD	TR	_____
08/16/21	2729100	MSNGR – Federal Express - Ship To: c o E3 Realty Advisors, Inc	0.00	13.93	WO	HD	TR	_____
08/23/21	2731316	MSNGR – Federal Express - Ship To: American National Investments, co E3 Realty Advisors, Inc	0.00	13.93	WO	HD	TR	_____
08/26/21	2734422	RSRCH – Lexis	0.00	10.60	WO	HD	TR	_____

09/15/22 09:31:11 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	
08/31/21	2734423	RSRCH – Lexis	0.00	59.40	WO	HD	TR	_____
09/01/21	2730800	DEPO – Veritext, LLC - Deposition Transcript of Cindy Sullivan Taken on 08/19/2021	0.00	1,630.40	WO	HD	TR	_____
09/01/21	2732603	EDISC – CS Disco, Inc. - Monthly Hosting for September 2021	0.00	2,342.91	WO	HD	TR	_____
09/03/21	2730952	BW – Duplication - Black & White Copies	69.00	6.90	WO	HD	TR	_____
09/10/21	2733260	COURT – -San Diego Superior Court,Obtain copies of pleadings from Court docket.	0.00	6.00	WO	HD	TR	_____
09/15/21	2737640	COURT – -SD SUPERIOR CRT ROA-Obtain copy of Luu v. Patio complaint	0.00	13.40	WO	HD	TR	_____
09/15/21	2737641	FILING – -COURTS/USDC-CAS-Filing fee for Kim Peterson, et al. complaint	0.00	402.00	WO	HD	TR	_____
09/16/21	2732393	DEPO – Veritext, LLC - Deposition Transcript of Kris Gagnon Taken on 09/01/2021	0.00	1,758.20	WO	HD	TR	_____
09/16/21	2732394	DEPO – Veritext, LLC - Deposition Transcript of Horacio Valeiras Taken on 09/10/2021	0.00	2,161.60	WO	HD	TR	_____
09/16/21	2732645	FILING – -USDC Southern District of California,Filing fee for Merit Financial complaint.	0.00	402.00	WO	HD	TR	_____
09/16/21	2737642	FILING – -COURTS/USDC-CAS-Filing fee for Valeiras Complaint	0.00	402.00	WO	HD	TR	_____
09/17/21	2732430	BW – Duplication - Black & White Copies	17.00	1.70	WO	HD	TR	_____
09/17/21	2734421	RSRCH – Lexis	0.00	59.40	WO	HD	TR	_____
09/20/21	2733033	FILING – -USDC Southern District of California,Filing fee for La Jolla Bridge Complaint	0.00	402.00	WO	HD	TR	_____
09/21/21	2733105	DEPO – Veritext, LLC - Deposition Transcript of Wade W. Wakefield Taken on 09/08/2021	0.00	1,895.60	WO	HD	TR	_____
09/22/21	2733134	BW – Duplication - Black & White Copies	46.00	4.60	WO	HD	TR	_____
09/22/21	2733184	DEPO – Veritext, LLC - Deposition Transcript of Doug Heidrich Taken on 09/09/2021	0.00	1,104.50	WO	HD	TR	_____

09/15/22 09:31:11 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					
09/23/21	2733358	DEPO – Veritext, LLC - Deposition Transcript of Greg Glassberg Taken on 09/10/2021	0.00	992.55	WO	HD	TR		_____
09/24/21	2736102	COURT – -San Diego Superior Court,Obtain copy of September 17, 2021 Minute Order from Court docket.	0.00	1.00	WO	HD	TR		_____
09/27/21	2733693	BW – Duplication - Black & White Copies	14.00	1.40	WO	HD	TR		_____
09/28/21	2736104	COURT – -San Diego Superior Court,Obtain copy of Complaint from Court docket.	0.00	25.40	WO	HD	TR		_____
09/29/21	2734080	DEPO – Veritext, LLC - Deposition Transcript of Todd Elling Taken on 09/17/2021	0.00	1,595.10	WO	HD	TR		_____
09/30/21	2734187	FILING – Clerk of the Court - Miscellaneous Court Filing Fee for Notice of Appointment of Receiver in the USDC, Eastern District of New York	0.00	49.00	WO	HD	TR		_____
09/30/21	2734188	FILING – Clerk of the Court - Miscellaneous Court Filing Fee for Notice of Appointment of Receiver in the USDC, District of Kansas	0.00	49.00	WO	HD	TR		_____
09/30/21	2735304	BW – Duplication - Black & White Copies	234.00	23.40	WO	HD	TR		_____
09/30/21	2735359	DEPO – Veritext, LLC - Deposition Transcript of Troy Ritter Taken on 09/21/2021	0.00	1,561.65	WO	HD	TR		_____
09/30/21	2738843	MSNGR – Messenger - First Legal - American National Investments Inc;	0.00	11.00	WO	HD	TR		_____
10/01/21	2736106	COURT – -San Diego Superior Court,Obtain copy of Order from Court docket.	0.00	5.40	WO	HD	TR		_____
10/01/21	2736351	EDISC – CS Disco, Inc. - Monthly Hosting for October 2021	0.00	2,342.91	WO	HD	TR		_____
10/01/21	2739520	RSRCH – Lexis	0.00	19.80	WO	HD	TR		_____
10/01/21	2746659	DCSRCH – Document Search - - PACER - 7/21 -9/21 Usage	0.00	1.10	WO	HD	TR		_____
10/01/21	2746665	DCSRCH – Document Search - - PACER - 7/21 -9/21 Usage	0.00	0.40	WO	HD	TR		_____
10/01/21	2746692	DCSRCH – Document Search - - PACER - 7/21 -9/21 Usage	0.00	1.40	WO	HD	TR		_____

09/15/22 09:31:11 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				
10/01/21	2746715	DCSRCH – Document Search - - PACER - 7/21 -9/21 Usage	0.00	5.80	WO	HD	TR	_____
10/01/21	2746728	DCSRCH – Document Search - - PACER - 7/21 -9/21 Usage	0.00	2.40	WO	HD	TR	_____
10/01/21	2746752	DCSRCH – Document Search - - PACER - 7/21 -9/21 Usage	0.00	0.60	WO	HD	TR	_____
10/01/21	2746753	DCSRCH – Document Search - - PACER - 7/21 -9/21 Usage	0.00	6.60	WO	HD	TR	_____
10/01/21	2746770	DCSRCH – Document Search - - PACER - 7/21 -9/21 Usage	0.00	0.60	WO	HD	TR	_____
10/01/21	2746772	DCSRCH – Document Search - - PACER - 7/21 -9/21 Usage	0.00	0.30	WO	HD	TR	_____
10/01/21	2746774	DCSRCH – Document Search - - PACER - 7/21 -9/21 Usage	0.00	0.30	WO	HD	TR	_____
10/01/21	2746778	DCSRCH – Document Search - - PACER - 7/21 -9/21 Usage	0.00	2.80	WO	HD	TR	_____
10/01/21	2746781	DCSRCH – Document Search - - PACER - 7/21 -9/21 Usage	0.00	0.10	WO	HD	TR	_____
10/01/21	2746784	DCSRCH – Document Search - - PACER - 7/21 -9/21 Usage	0.00	1.40	WO	HD	TR	_____
10/04/21	2735806	FILING – -USDC Southern District of California,Filing fee for Jason Lulis complaint.	0.00	402.00	WO	HD	TR	_____
10/04/21	2735807	FILING – -USDC Southern District of California,Filing fee for Robb Potter complaint.	0.00	402.00	WO	HD	TR	_____
10/04/21	2735836	MEDIT – Judicate West - Mediator's Services - 5/13/2021-9/28/2021	0.00	2,500.00	WO	HD	TR	_____
10/05/21	2737541	POS – First Legal Network, LLC - JASON LULIS; SUMMONS; COMPLAINT	0.00	417.97	WO	HD	TR	_____
10/05/21	2742399	ADV – First Legal Network, LLC - JASON LULIS; SUMMONS; COMPLAINT; CC SHEET	0.00	10.00	WO	HD	TR	_____
10/06/21	2735808	FILING – -USDC Southern District of California,Filing fee for ROJ Complaint.	0.00	402.00	WO	HD	TR	_____
10/06/21	2737458	MSNGR – Federal Express - Ship To: Clerk of the Court, US Dist C - Eastern District of New York	0.00	39.08	WO	HD	TR	_____

09/15/22 09:31:11 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				
10/07/21	2735914	DEPO – Veritext, LLC - Deposition Transcript of John Madden Taken on 10/01/2021	0.00	1,087.80	WO	HD	TR	_____
10/07/21	2737460	MSNGR – Federal Express - Ship To: John Kaup - Allen Matkins	0.00	31.61	WO	HD	TR	_____
10/08/21	2736109	FILING – -USDC Southern District of California,Filing fee for Covington Complaint	0.00	402.00	WO	HD	TR	_____
10/08/21	2737464	MSNGR – Federal Express - Ship To: Clerk of the Court, Dist of K - United States District Court	0.00	30.56	WO	HD	TR	_____
10/12/21	2736448	DEPO – Veritext, LLC - Deposition Transcript of Joel Katz Taken on 10/07/2021	0.00	1,629.25	WO	HD	TR	_____
10/12/21	2736637	FILING – -USDC Southern District of California,Filing fee for Daniel Levene Complaint	0.00	402.00	WO	HD	TR	_____
10/12/21	2737467	MSNGR – Federal Express - Ship To: John Kaup - Allen Matkins	0.00	23.50	WO	HD	TR	_____
10/13/21	2736524	BW – Duplication - Black & White Copies	284.00	28.40	WO	HD	TR	_____
10/13/21	2736638	FILING – -USDC Southern District of California,Filing fee for Jon and Claudia Peterson Complaint	0.00	402.00	WO	HD	TR	_____
10/13/21	2738505	MSNGR – Federal Express - Ship To: John Kaup - Allen Matkins	0.00	36.45	WO	HD	TR	_____
10/14/21	2737138	FILING – -USDC Southern District of California,Filing fee for Sherri Luongo complaint.	0.00	402.00	WO	HD	TR	_____
10/14/21	2737545	POS – First Legal Network, LLC - ROJ LLC; SUMMONS; COMPLAINT	0.00	210.94	WO	HD	TR	_____
10/14/21	2746798	POS – Service of Process - First Legal - DANIEL G LEVENE; SUMMONS; COMPLAINT AND CC SHEET	0.00	319.75	WO	HD	TR	_____
10/18/21	2737555	COURT – -San Diego Superior Court,Obtain copy of Motion documents from Court docket.	0.00	19.60	WO	HD	TR	_____
10/19/21	2737192	BW – Duplication - Black & White Copies	1,182.00	118.20	WO	HD	TR	_____
10/23/21	2737935	DEPO – Veritext, LLC - Deposition Transcript of Howard Nirken Taken on 10/18/2021	0.00	2,058.85	WO	HD	TR	_____
10/26/21	2746802	POS – Service of Process - First Legal - SHERYL A LUONGO; SUMMONS; COMPLAINT AND CC SHEET	0.00	426.91	WO	HD	TR	_____

09/15/22 09:31:11 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	
10/26/21	2746803	POS – Service of Process - First Legal - JAMES COVINGTON; SUMMONS; COMPLAINT AND CC SHEET	0.00	262.50	WO	HD	TR	_____
11/01/21	2741057	EDISC – CS Disco, Inc. - Monthly Hosting for November 2021	0.00	2,252.33	WO	HD	TR	_____
11/03/21	2740399	DEPO – Veritext, LLC - Deposition Transcript of Madeline Lovejoy Taken on 10/20/2021	0.00	1,065.90	WO	HD	TR	_____
11/03/21	2740400	DEPO – Veritext, LLC - Deposition Transcript of Horacio Valeiras, Volume 2 Taken on 10/15/2021	0.00	1,013.15	WO	HD	TR	_____
11/03/21	2742401	DCSRCH – First Legal Network, LLC - USDC - San Diego; OBTAIN A CERTIFIED COPY OF DOCUMENT #720	0.00	91.55	WO	HD	TR	_____
11/03/21	2742402	MSNGR – First Legal Network, LLC - American National Investments Inc.; Deliver Courtesy	0.00	11.00	WO	HD	TR	_____
11/04/21	2742404	MSNGR – First Legal Network, LLC - Corinthian Title & Escrow; Pick up envelope	0.00	15.26	WO	HD	TR	_____
11/08/21	2741277	COURT – -San Diego Superior Court,Copy of Defendants' Answer in Luu v. Patio case	0.00	6.20	WO	HD	TR	_____
11/11/21	2740711	DEPO – Veritext, LLC - Deposition Transcript of Jacob Ancona Taken on 10/28/2021	0.00	1,556.10	WO	HD	TR	_____
11/15/21	2740822	BW – Duplication - Black & White Copies	235.00	23.50	WO	HD	TR	_____
11/15/21	2742559	COURT – -San Diego Superior Court,Obtain copies of Chicago Title amended cross-complaints from Court's docket.	0.00	91.20	WO	HD	TR	_____
11/16/21	2740948	DEPO – Veritext, LLC - Deposition Transcript of William Joseph Goodman Taken on 11/10/2021	0.00	1,912.15	WO	HD	TR	_____
11/16/21	2741278	FILING – -USDC Southern District of California,Filing fee for Copp complaint.	0.00	402.00	WO	HD	TR	_____
11/18/21	2743402	DEPO – Veritext LLC - Deposition Transcript of Kim Peterson, Vol. 1 Taken on 11/11/2021	0.00	2,034.20	WO	HD	TR	_____
11/23/21	2742450	DEPO – Veritext, LLC - Deposition Transcript of Kim Peterson, Vol. 2 Taken on 11/12/2021	0.00	2,114.25	WO	HD	TR	_____
11/23/21	2742451	DEPO – Veritext, LLC - Deposition Transcript of Kim Peterson Vol 3 Taken on 11/17/2021	0.00	1,025.65	WO	HD	TR	_____
11/29/21	2743708	COURT – -San Diego Superior Court,Obtain copy of motion from Court docket in the Kim Funding action.	0.00	5.80	WO	HD	TR	_____

09/15/22 09:31:11 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	
12/01/21	2745485	EDISC – CS Disco, Inc. - Monthly Hosting for December 2021	0.00	2,304.68	WO	HD	TR	_____
12/06/21	2743706	COURT – -San Diego Superior Court,Obtain copy of Chicago Title pleadings from Court docket.	0.00	14.20	WO	HD	TR	_____
12/07/21	2743432	BW – Duplication - Black & White Copies	289.00	28.90	WO	HD	TR	_____
12/08/21	2744075	DEPO – Veritext, LLC - Deposition Transcript of Chris Ghio Taken on 11/30/2021	0.00	1,603.25	WO	HD	TR	_____
12/10/21	2744076	DEPO – Veritext, LLC - Deposition Transcript of Paul Perez Taken on 12/09/2021	0.00	2,260.40	WO	HD	TR	_____
12/13/21	2744117	BW – Duplication - Black & White Copies	26.00	2.60	WO	HD	TR	_____
12/13/21	2745371	COURT – -San Diego Superior Court,Obtain copy of Chicago Title documents from Court docket	0.00	17.60	WO	HD	TR	_____
12/13/21	2745372	COURT – -San Diego Superior Court,Obtain copy of Chicago Title documents from Court docket	0.00	12.60	WO	HD	TR	_____
12/14/21	2744264	DEPO – Veritext, LLC - Deposition Transcript of Liz Franklin Taken on 12/03/2021	0.00	2,183.55	WO	HD	TR	_____
12/17/21	2744797	DEPO – Veritext, LLC - Deposition Transcript of Ed Kezar Taken on 12/15/2021	0.00	1,751.45	WO	HD	TR	_____
12/19/21	2744798	DEPO – Veritext, LLC - Deposition Transcript of Betty Elixman Taken on 12/14/2021	0.00	1,174.35	WO	HD	TR	_____

Proforma Summary

Timekeeper Number	Timekeeper	Hours	Rate	Amounts
000820	Kaup, John	0.20	315.00	63.00
001665	Fates, Edward (Ted)	2.70	643.50	1,737.45
		2.90		\$1,800.45
Subtotal Fees				\$1,800.45
Discount				0.00
Total Fees				1,800.45
Total Disbursements				70,661.87

Attorney Billing Instructions

09/15/22 09:31:11 PROFORMA STATEMENT FOR MATTER 378827.00002 (Krista Freitag, as Receiver for ANI Deve) (SEC v. Champion-Cain - General Receivers)

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

Billing Instructions

expires 6/30/2023: 10% off standard rates (automatic); no text editing; copies @ .10

Account Summary – As Of 09/15/22

	Fiscal YTD			Calendar YTD			LTD		
	Total	Fees	Disb.	Total	Fees	Disb.	Total	Fees	Disbursements
Worked	4,571.40	3,993.30	578.10	16,902.90	16,902.90	0.00	365,757.80	82,475.10	283,282.70
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	142,295.23	7,038.00	135,257.23	63,036.90	63,036.90	212,620.83
Collected	0.00	0.00	0.00	142,295.23	7,038.00	135,257.23	275,657.73	63,036.90	212,620.83
AR Write Off	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00
WIP Balance	244,865.30	19,437.75	225,427.55						
AR Balance	0.00	0.00	0.00						
Unalloc Payment	0.00								
Client Trust Balance	0.00								

Billing Address

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

09/15/22 09:31:13 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: 05/17/22 Matter Name: SEC v. Champion-Cain - Asset Investigati
 Proforma Number: 1180576
 Client/Matter Joint Group # 378827-1 Client Matter Number:

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

Trans Date	Index	Description of Service Rendered	Timekeeper	Hours	Fees	Sum	Circle	Action	
07/06/21	8524523	Confer with counsel and counsel for Merit Financial regarding Chase production of records relating to Merit Financial (.3).	Aspis, Norman	0.30	133.65	133.65	WO	HD	TR
07/07/21	8500488	Assess letter demand/counter and review status of demand letter regarding Hiscox, follow-up call with Hiscox counsel, Mr. McCallk as to Receiver's claim (.6).	Zaro, David	0.60	502.20	635.85	WO	HD	TR
07/08/21	8500578	Discuss investigation of potential claims against third parties with Receiver	Fates, Edward (Ted)	0.40	257.40	893.25	WO	HD	TR
07/08/21	8502015	Research issues related to the Hiscox insurance matter, follow-up call with Hiscox counsel regarding coverage.	Zaro, David	0.80	669.60	1,562.85	WO	HD	TR
07/15/21	8509235	Email and follow-up on the Hiscox matter and prepare for meeting with Hiscox (.3).	Zaro, David	0.30	251.10	1,813.95	WO	HD	TR
07/15/21	8525670	Confer with counsel regarding Chase production of Merit Financial records and confer with Chase representative regarding the same (.6).	Aspis, Norman	0.60	267.30	2,081.25	WO	HD	TR

09/15/22 09:31:13 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	
07/21/21	8512870	Research/analysis of the Hiscox insurance claim, address primary legal issues/contract interpretation, follow-up (1.6).	Zaro, David	1.60	1,339.20	3,420.45	WO	HD	TR
07/21/21	8524388	Review documents produced from JP Morgan Chase relating to Merit Financial and transmit the same to K. Freitag (.4).	Aspis, Norman	0.40	178.20	3,598.65	WO	HD	TR
07/22/21	8514119	Prepare for/attend conference call with counsel for Hiscox related to policy and dispute over terms (.6). Evaluate Hiscox letter response and follow-up on case cities, evaluate next steps (.6).	Zaro, David	1.20	1,004.40	4,603.05	WO	HD	TR
07/23/21	8515811	Evaluate the Hiscox letter response and then draft email to Receiver related to Hiscox status/settlement.	Zaro, David	0.70	585.90	5,188.95	WO	HD	TR
07/28/21	8518308	Analyze and advise on issues relating to potential settlement of insurance claim against crime/theft policy	Fates, Edward (Ted)	0.30	193.05	5,382.00	WO	HD	TR
07/28/21	8520286	Email/call with Receiver and counsel to address the Hiscox claim and Receiver reponse/settlement.	Zaro, David	0.40	334.80	5,716.80	WO	HD	TR
08/19/21	8543953	Work on draft of the Hiscox letter response/settlement offer (.4).	Zaro, David	0.40	334.80	6,051.60	WO	HD	TR
08/21/21	8544099	Review of the insurance contract and prepare Hiscox letter response/settlement offer.	Zaro, David	1.20	1,004.40	7,056.00	WO	HD	TR
08/25/21	8550270	Analysis of Hiscox' prior responses and cases, Hiscox letter and proposed	Zaro, David	1.80	1,506.60	8,562.60	WO	HD	TR

09/15/22 09:31:13 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	
		settlement to Hiscox (1.1). Revisions to draft letter, address Hiscox defenses/email to Receiver (.7).							
08/26/21	8551328	Several emails/calls related to Hiscox letter and finalize the same.	Zaro, David	0.40	334.80	8,897.40	WO	HD	TR
08/30/21	8556730	Review Hiscox letter and follow-up regarding Hiscox request for continuance/email (.3).	Zaro, David	0.30	251.10	9,148.50	WO	HD	TR
09/10/21	8565323	Review status of settlement negotiations and offer, emails with counsel for Hiscox.	Zaro, David	0.30	251.10	9,399.60	WO	HD	TR
09/13/21	8564971	Analyze notice re: ANI investment in BayMedica and potential purchase transaction	Fates, Edward (Ted)	0.30	193.05	9,592.65	WO	HD	TR
09/15/21	8567765	Analyze and advise on strategy and approach to potential settlement of Hiscox Insurance claim	Fates, Edward (Ted)	0.20	128.70	9,721.35	WO	HD	TR
09/15/21	8569194	Follow-up to review the options, issues related to the Hiscox offer and email to Receiver re: settlement (.5).	Zaro, David	0.50	418.50	10,139.85	WO	HD	TR
09/20/21	8572219	Discuss issues relating to BayMedica investment with Receiver	Fates, Edward (Ted)	0.20	128.70	10,268.55	WO	HD	TR
09/22/21	8575270	Analyze issues re: BayMedica merger transaction and potential conversion of note to equity, advise Receiver and G. Rodriguez re: same	Fates, Edward (Ted)	0.50	321.75	10,590.30	WO	HD	TR
09/30/21	8588154	Prepare for/attend call with Receiver related to Hiscox claim.	Zaro, David	0.30	251.10	10,841.40	WO	HD	TR

09/15/22 09:31:13 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			
10/04/21	8591774	Email related to Hiscox and follow-up with counsel.	Zaro, David	0.20	167.40	11,008.80	WO	HD	TR	_____
10/06/21	8594352	Several emails and call with Hixcox counsel related to settlement.	Zaro, David	0.40	334.80	11,343.60	WO	HD	TR	_____
10/06/21	8611078	Analyze information regarding amended BayMedica transaction and noteholder consent documents	Fates, Edward (Ted)	0.30	193.05	11,536.65	WO	HD	TR	_____
10/07/21	8598578	Evaluate Hiscox offer and assess proposed Receiver response, advice and call with Receiver (.6). Emails with Hiscox as to settlement (.2).	Zaro, David	0.80	669.60	12,206.25	WO	HD	TR	_____
10/21/21	8610238	Follow-up on the status of Hiscox settlement and emails with Hiscox counsel.	Zaro, David	0.60	502.20	12,708.45	WO	HD	TR	_____
10/26/21	8612660	Prepare for/attend call with Hiscox counsel related to settlement proposal.	Zaro, David	0.40	334.80	13,043.25	WO	HD	TR	_____
11/03/21	8623260	Communications with CTC counsel regarding escrow funds relating to 301 D street project (.3) discuss same with Receiver and counsel (.4)	Fates, Edward (Ted)	0.70	450.45	13,493.70	WO	HD	TR	_____
11/03/21	8625575	Several emails/call with Receiver counsel related to escrow funds concerning the D Street Property (.3). Analysis of the further records from Chicago Title and follow-up (.6)	Zaro, David	0.90	753.30	14,247.00	WO	HD	TR	_____
11/04/21	8629485	Analysis and determination of document productions in preparation for attorney review.	Peng, Simona	1.30	409.50	14,656.50	WO	HD	TR	_____

09/15/22 09:31:13 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	
11/05/21	8629491	Analysis and determination of document productions in preparation for attorney review.	Peng, Simona	0.10	31.50	14,688.00	WO	HD	TR
11/08/21	8627398	Communications with L. Ryan re: document repository expense issue	Fates, Edward (Ted)	0.20	128.70	14,816.70	WO	HD	TR
11/09/21	8629120	Discuss issues re: 301 D Street escrow funds at CTC with Receiver	Fates, Edward (Ted)	0.20	128.70	14,945.40	WO	HD	TR
11/10/21	8632715	Review the Hiscox settlement status and email/call with Hiscox counsel.	Zaro, David	0.40	334.80	15,280.20	WO	HD	TR
11/11/21	8632740	Follow-up on the proposal regarding Hiscox settlement and follow-up.	Zaro, David	0.40	334.80	15,615.00	WO	HD	TR
11/12/21	8632774	Advise on issues relating to recovery on Hiscox insurance claim and resolution of same	Fates, Edward (Ted)	0.20	128.70	15,743.70	WO	HD	TR
11/12/21	8635558	Evaluate escrow documents/emails and follow-up email to CRC counsel regarding turnover of the funds from account as to TriCorp - D Street, follow-up with Receiver counsel	Zaro, David	0.60	502.20	16,245.90	WO	HD	TR
11/18/21	8640002	Emails regarding Hiscox settlement with counsel, address terms of settlement and release.	Zaro, David	0.40	334.80	16,580.70	WO	HD	TR
11/19/21	8643047	Prepare for/attend call with Hiscox counsel related to the settlement, follow-up (.4). Evaluate the ANI preliminary injunction order/authority of Receiver to settlement (.2).	Zaro, David	0.60	502.20	17,082.90	WO	HD	TR

09/15/22 09:31:13 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			
11/29/21	8648215	Emails with Receiver/CTC concerning the recovery of fund held in CTC account related to D Street project.	Zaro, David	0.40	334.80	17,417.70	WO	HD	TR	_____
12/03/21	8658716	Work on the Hiscox and Receiver settlement agreement.	Zaro, David	0.60	502.20	17,919.90	WO	HD	TR	_____
12/06/21	8658749	Review emails and Hiscox letters, finalize draft of the Hiscox Insurance settlement agreement and follow-up (1.4). Email to Hiscox counsel related to the settlement (.2).	Zaro, David	1.60	1,339.20	19,259.10	WO	HD	TR	_____
12/07/21	8657585	Discuss investigation into potential payments to J. Milito with Receiver (.2) call/emails with counsel for Champion-Cain re: same (.4)	Fates, Edward (Ted)	0.60	386.10	19,645.20	WO	HD	TR	_____
12/08/21	8659959	Emails with Receiver and Hiscox counsel, Mr. McCall related to the settlement.	Zaro, David	0.40	334.80	19,980.00	WO	HD	TR	_____
12/09/21	8661087	Email regarding Hiscox settlement and assess comments of Hiscox to the settlement agreement (.4). Further revisions to the draft of the Hiscox settlement agreement (.3).	Zaro, David	0.70	585.90	20,565.90	WO	HD	TR	_____
12/10/21	8663285	Review/evaluate the draft of Hiscox agreement regarding settlement, comments and revisions (.7). Follow-up on draft of the agreement/ further revisions (.5). Email to the Receiver related to the settlement (.3). Emails with Receiver and CTC counsel/Donahue regarding D Street escrow (.2).	Zaro, David	1.70	1,422.90	21,988.80	WO	HD	TR	_____

09/15/22 09:31:13 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			
12/14/21	8665982	Emails to/from CTC and Recewiver related to the recovery of the D Street escrow and the Hiscox policy (.5). Call with Receiver related to Hiscox settlement and Receiver documents (.2).	Zaro, David	0.70	585.90	22,574.70	WO	HD	TR	_____
12/15/21	8665495	Communications with Receiver and CTC re: recovery of 301 D Street escrow funds	Fates, Edward (Ted)	0.30	193.05	22,767.75	WO	HD	TR	_____
12/15/21	8669627	Revisions to the draft of Hiscox settlement agreement/email to Hiscox counsel, follow-up regarding same (.5).	Zaro, David	0.50	418.50	23,186.25	WO	HD	TR	_____

Proforma Summary

Timekeeper

Number	Timekeeper	Hours	Rate	Amounts
000313	Zaro, David	23.10	837.00	19,334.70
001665	Fates, Edward (Ted)	4.40	643.50	2,831.40
002307	Peng, Simona	1.40	315.00	441.00
002369	Aspis, Norman	1.30	445.50	579.15
		30.20		\$23,186.25
Subtotal Fees				\$23,186.25
Discount				0.00
Total Fees				23,186.25
Total Disbursements				0.00

Attorney Billing Instructions

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

Billing Instructions

09/15/22 09:31:13 PROFORMA STATEMENT FOR MATTER 378827.00003 (Krista Freitag, as Receiver for ANI Deve) (SEC v. Champion-Cain - Asset Investigati)

expires 6/30/2023: 10% off standard rates (automatic); no text editing; copies @ .10

Account Summary – As Of 09/15/22

	Fiscal YTD			Calendar YTD			LTD		
	Total	Fees	Disb.	Total	Fees	Disb.	Total	Fees	Disbursements
Worked	6,282.45	6,282.45	0.00	16,316.55	16,316.55	0.00	436,160.50	427,032.00	9,128.50
Unbilled Adj	0.00	0.00	0.00	0.00	0.00	0.00	3,075.11	9.63	3,065.48
Billed	0.00	0.00	0.00	59,326.92	59,326.92	0.00	360,638.82	360,638.82	9,128.50
Collected	0.00	0.00	0.00	59,326.92	59,326.92	0.00	369,767.32	360,638.82	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	Total	Fees	Costs						
Balance	76,797.05	62,122.05	14,675.00						
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

09/15/22 09:31:14 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: 05/17/22 Matter Name: SEC v. Champion-Cain - Reporting
 Proforma Number: 1180576
 Client/Matter Joint Group # 378827-1 Client Matter Number:

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

Trans Date	Index	Description of Service Rendered	Timekeeper	Hours	Fees	Sum	Circle	Action	
08/10/21	8533026	Work on Receiver's 8th interim report.	Fates, Edward (Ted)	1.20	772.20	772.20	WO	HD	TR
08/20/21	8543987	Revise/evaluate the draft Receiver's Report, follow-up email communications with Receiver and counsel (.9). Follow-up regarding exhibits as to report/follow-up on filing of same (.2).	Zaro, David	1.10	920.70	1,692.90	WO	HD	TR
11/09/21	8628705	Discuss preparation of quarterly interim report for third quarter with Receiver (.4) revisions to quarterly interim report (1.6) meet and confer communications with SEC counsel (.2)	Fates, Edward (Ted)	2.20	1,415.70	3,108.60	WO	HD	TR
11/12/21	8632931	Meet and confer communications with SEC counsel re: Receiver's quarterly interim report, advise Receiver re: same	Fates, Edward (Ted)	0.20	128.70	3,237.30	WO	HD	TR
11/15/21	8641890	Discuss revisions to report with Receiver (.3) finalize same (.3)	Fates, Edward (Ted)	0.60	386.10	3,623.40	WO	HD	TR

Proforma Summary

09/15/22 09:31:14 PROFORMA STATEMENT FOR MATTER 378827.00004 (Krista Freitag, as Receiver for ANI Deve) (SEC v. Champion-Cain - Reporting)

Timekeeper

Number	Timekeeper	Hours	Rate	Amounts
000313	Zaro, David	1.10	837.00	920.70
001665	Fates, Edward (Ted)	4.20	643.50	2,702.70
		<u>5.30</u>		<u>\$3,623.40</u>
Subtotal Fees				\$3,623.40
Discount				0.00
Total Fees				3,623.40
Total Disbursements				0.00

Attorney Billing Instructions

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

Billing Instructions

expires 6/30/2023: 10% off standard rates (automatic); no text editing; copies @ .10
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Account Summary – As Of 09/15/22

	Fiscal YTD			Calendar YTD			LTD		
	Total	Fees	Disb.	Total	Fees	Disb.	Total	Fees	Disbursements
Worked	1,583.55	1,583.55	0.00	5,882.40	5,882.40	0.00	77,256.00	77,256.00	0.00
Unbilled Adj	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00
Billed	0.00	0.00	0.00	16,529.40	16,529.40	0.00	57,082.05	57,082.05	0.00
Collected	0.00	0.00	0.00	16,529.40	16,529.40	0.00	57,082.05	57,082.05	0.00
AR Write Off	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00
WIP	20,173.95	20,173.95	0.00						
Balance									
AR Balance	0.00	0.00	0.00						
Unalloc	0.00								
Payment									
Client Trust	0.00								
Balance									

09/15/22 09:31:14 PROFORMA STATEMENT FOR MATTER 378827.00004 (Krista Freitag, as Receiver for ANI Deve) (SEC v. Champion-Cain - Reporting)

Billing Address

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

09/15/22 09:31:15 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: 05/17/22 Matter Name: SEC v. Champion-Cain - Operations & Asse
 Proforma Number: 1180576
 Client/Matter Joint Group # 378827-1 Client Matter Number:

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

Trans Date	Index	Description of Service Rendered	Timekeeper	Hours	Fees	Sum	Circle	Action	
07/06/21	8498743	Communications with G. Rodriguez re: lack of overbids for 1775 Diamond St. property and notice re: same	Fates, Edward (Ted)	0.20	128.70	128.70	WO	HD	TR
07/07/21	8499501	Prepare notice re: non-receipt of overbids for 1775 Diamond Street sale motion	Fates, Edward (Ted)	0.30	193.05	321.75	WO	HD	TR
07/21/21	8511420	Review order approving Diamond Street sale and advise Receiver re: same	Fates, Edward (Ted)	0.20	128.70	450.45	WO	HD	TR
08/04/21	8528825	Communications with G. Rodriguez re: purchase and sale agreement for Patio on Lamont liquor license	Fates, Edward (Ted)	0.30	193.05	643.50	WO	HD	TR
08/05/21	8554477	Correspond with the client re: the amendment to the liquor license purchase and sale agreement with Eggies LLC; begin reviewing and analyzing such agreement as necessary.	Hawn, Megan	0.90	372.60	1,016.10	WO	HD	TR
08/10/21	8554634	Continue reviewing and analyzing the liquor license purchase and sale agreement with Eggies LLC; begin drafting the amendment	Hawn, Megan	2.80	1,159.20	2,175.30	WO	HD	TR

09/15/22 09:31:15 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 to such agreement.	Timekeeper	Hours	Fees	Sum	Circle	Action	
08/11/21	8534251	Review liquor licensing requirements as applicable to transfer of consideration for Patio on Lamont.	Lorenzen, Jonathan	1.40	806.40	2,981.70	WO	HD	TR
08/13/21	8536623	Review Amendment to Patio on Lamont.	Lorenzen, Jonathan	0.60	345.60	3,327.30	WO	HD	TR
08/13/21	8554637	Continue drafting the first amendment to the liquor license purchase and sale agreement with Eggies, LLC.	Hawn, Megan	2.40	993.60	4,320.90	WO	HD	TR
09/07/21	8560865	Review status of Purchase and Sale Agreement for liquor license sale relating to Patio at Lamont.	Lorenzen, Jonathan	0.40	230.40	4,551.30	WO	HD	TR
09/09/21	8563354	Communications with G. Rodriguez re: PSA for liquor license sale	Fates, Edward (Ted)	0.30	193.05	4,744.35	WO	HD	TR
09/09/21	8573558	Draft Purchase and Sale Agreement for Liquor License (Eggies).	Palmer, Lauren	2.10	661.50	5,405.85	WO	HD	TR
09/10/21	8563690	Review and revise liquor license purchase and sale agreement for Patio on Lamont.	Lorenzen, Jonathan	1.20	691.20	6,097.05	WO	HD	TR
09/10/21	8578195	Revise liquor license transfer per client comments.	Palmer, Lauren	0.70	220.50	6,317.55	WO	HD	TR
09/13/21	8565739	Review and revise Purchase and Sale Agreement for Patio on Lamont liquor license.	Lorenzen, Jonathan	0.20	115.20	6,432.75	WO	HD	TR
09/15/21	8572395	Advise Receiver on ANI employee insurance issues	Fates, Edward (Ted)	0.30	193.05	6,625.80	WO	HD	TR

09/15/22 09:31:15 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	Timekeeper	Hours	Fees	Sum	Circle Action			
09/16/21	8568830	Analyze issues and discuss second motion to approve sale of Diamond Street property with G. Rodriguez (.4) work on sale approval motion (1.1)	Fates, Edward (Ted)	1.50	965.25	7,591.05	WO	HD	TR	_____
09/20/21	8572564	Work on revisions to Diamond Street sale motion (.4) discuss same with Receiver (.2) work on Receiver declaration, proposed order, and notice of motion (.7)	Fates, Edward (Ted)	1.30	836.55	8,427.60	WO	HD	TR	_____
09/22/21	8574997	Revise and finalize Receiver declaration and motion to approval of Diamond property sale (.4) communications with Receiver re: same (.1)	Fates, Edward (Ted)	0.50	321.75	8,749.35	WO	HD	TR	_____
09/29/21	8582601	Review Liquor License Purchase Agreement for Patio on Lamont.	Lorenzen, Jonathan	0.40	230.40	8,979.75	WO	HD	TR	_____
10/18/21	8603013	Communications with G. Rodriguez re: overbid deadline for Diamond Street sale	Fates, Edward (Ted)	0.20	128.70	9,108.45	WO	HD	TR	_____
10/19/21	8604145	Revise and finalize notice re: lack of qualified overbids for Diamond Street sale	Fates, Edward (Ted)	0.30	193.05	9,301.50	WO	HD	TR	_____
11/03/21	8623288	Analyze order approving Diamond Street sale (.2) advise Receiver re: same (.1)	Fates, Edward (Ted)	0.30	193.05	9,494.55	WO	HD	TR	_____

Proforma Summary

Timekeeper Number	Timekeeper	Hours	Rate	Amounts
001665	Fates, Edward (Ted)	5.70	643.50	3,667.95
002115	Lorenzen, Jonathan	4.20	576.00	2,419.20
002306	Hawn, Megan	6.10	414.00	2,525.40

09/15/22 09:31:15 PROFORMA STATEMENT FOR MATTER 378827.00005 (Krista Freitag, as Receiver for ANI Deve) (SEC v. Champion-Cain - Operations & Asse)

Proforma Summary

Timekeeper

Number	Timekeeper	Hours	Rate	Amounts
002403	Palmer, Lauren	2.80	315.00	882.00
		18.80		\$9,494.55
Subtotal Fees				\$9,494.55
Discount				0.00
Total Fees				9,494.55
Total Disbursements				0.00

Attorney Billing Instructions

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

Billing Instructions

expires 6/30/2023: 10% off standard rates (automatic); no text editing; copies @ .10

Account Summary – As Of 09/15/22

	Fiscal YTD			Calendar YTD			LTD		
	Total	Fees	Disb.	Total	Fees	Disb.	Total	Fees	Disbursements
Worked	963.90	963.90	0.00	963.90	963.90	0.00	742,734.45	742,734.45	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	87,047.55	87,047.55	0.00	710,042.40	710,042.40	0.00
Collected	0.00	0.00	0.00	87,047.55	87,047.55	0.00	710,042.40	710,042.40	0.00
AR Write Off	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00
WIP	32,692.05	32,692.05	0.00						
Balance									
AR Balance	0.00	0.00	0.00						
Unalloc	0.00								
Payment									
Client Trust	0.00								
Balance									

09/15/22 09:31:15 PROFORMA STATEMENT FOR MATTER 378827.00005 (Krista Freitag, as Receiver for ANI Deve) (SEC v. Champion-Cain - Operations & Asse)

Billing Address

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

09/15/22 09:31:17 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: 05/17/22 Matter Name: SEC v. Champion-Cain - Claims & Distribu
 Proforma Number: 1180576
 Client/Matter Joint Group # 378827-1 Client Matter Number:

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

Trans Date	Index	Description of Service Rendered	Timekeeper	Hours	Fees	Sum	Circle	Action	
07/07/21	8499460	Discuss responses to investor inquiries with Receiver	Fates, Edward (Ted)	0.20	128.70	128.70	WO	HD	TR
07/08/21	8500351	Communications with counsel for CTC re: requested settlement payment information for investor claims process	Fates, Edward (Ted)	0.50	321.75	450.45	WO	HD	TR
07/09/21	8501401	Communications with counsel for Atherton investors re: information on CTC settlement payments for purposes of receivership claim calculations	Fates, Edward (Ted)	0.30	193.05	643.50	WO	HD	TR
07/22/21	8512811	Discuss CTC settlement payment info needed with Receiver (.5) communications with counsel for CTC re: same (.2) communications with counsel for Christofferson group re: CTC payment information needed (.4) analyze Williamson group settlement and communications with R. Williamson re: same (.7)	Fates, Edward (Ted)	1.80	1,158.30	1,801.80	WO	HD	TR
07/23/21	8525047	Compile information re: CTC settlement payments to investors and discuss same	Fates, Edward (Ted)	0.60	386.10	2,187.90	WO	HD	TR

09/15/22 09:31:17 PROFORMA STATEMENT FOR MATTER 378827.00006 (Krista Freitag, as Receiver for ANI Deve) (SEC v. Champion-Cain - Claims & Distribu)

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

Trans Date	Index	Description of Service Rendered with Receiver	Timekeeper	Hours	Fees	Sum	Circle	Action	
07/26/21	8515284	Follow up communications with counsel for Atherton group re: CTC settlement payment info for claims process (.4) analyze impact on claims and discuss same with Receiver (.5)	Fates, Edward (Ted)	0.90	579.15	2,767.05	WO	HD	TR _____
07/27/21	8516840	Discuss CTC settlement payments and investor claim calculations with Receiver (.5) follow up communications with counsel for Christofferson group re: information on CTC settlement payments (.2)	Fates, Edward (Ted)	0.70	450.45	3,217.50	WO	HD	TR _____
07/30/21	8520470	Communications with counsel for Atherton investors and Receiver re: CTC settlement payment info for claims process	Fates, Edward (Ted)	0.30	193.05	3,410.55	WO	HD	TR _____
08/03/21	8527350	Communications with counsel for Christofferson investors re: CTC settlement payment information needed for claim calculations	Fates, Edward (Ted)	0.40	257.40	3,667.95	WO	HD	TR _____
08/13/21	8536870	Discuss claim notices to investors with Receiver	Fates, Edward (Ted)	0.20	128.70	3,796.65	WO	HD	TR _____
08/16/21	8538100	Discuss investor claim notices issues with Receiver	Fates, Edward (Ted)	0.30	193.05	3,989.70	WO	HD	TR _____
09/07/21	8560489	Communications with J. Lance re: settlement approval motion	Fates, Edward (Ted)	0.10	64.35	4,054.05	WO	HD	TR _____
09/08/21	8561975	Discuss issues re: J. Gatehouse claim with Receiver	Fates, Edward (Ted)	0.20	128.70	4,182.75	WO	HD	TR _____

09/15/22 09:31:17 PROFORMA STATEMENT FOR MATTER 378827.00006 (Krista Freitag, as Receiver for ANI Deve) (SEC v. Champion-Cain - Claims & Distribu)

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

Trans Date	Index	Description of Service Rendered	Timekeeper	Hours	Fees	Sum	Circle	Action		
09/08/21	8564110	Call with Receiver counsel regarding coordination of claims process, AUSA restitution process and related claims.	Zaro, David	0.20	167.40	4,350.15	WO	HD	TR	_____
09/17/21	8570213	Advise Receiver re: response to investor inquiry re: tax issues	Fates, Edward (Ted)	0.20	128.70	4,478.85	WO	HD	TR	_____
09/30/21	8587025	Review information relating to claim in small claims court as to vacation rental property (.3) discuss same with Receiver and G. Rodriguez (.4) communications with J. Lance re: same (.4)	Fates, Edward (Ted)	1.10	707.85	5,186.70	WO	HD	TR	_____
10/05/21	8611076	Communications with J. Lance re: small claims matter for vacation rental security deposit (.2) discuss same with G. Rodriguez (.3) discuss issues re: claims process with Receiver (.3) communications with court clerk re: same (.4)	Fates, Edward (Ted)	1.20	772.20	5,958.90	WO	HD	TR	_____
10/07/21	8592717	Assist Receiver in addressing investor inquiries regarding tax returns and 1099 tax statements	Fates, Edward (Ted)	0.20	128.70	6,087.60	WO	HD	TR	_____
10/07/21	8593119	Communications with J. Lance and G. Rodriguez re: small claims relating to vacation rental deposits and release agreement re: same	Fates, Edward (Ted)	0.30	193.05	6,280.65	WO	HD	TR	_____
10/11/21	8595559	Discuss investor inquiry re: tax issues with Receiver (.2) communications with G. Rodriguez re: small claims matter (.2)	Fates, Edward (Ted)	0.40	257.40	6,538.05	WO	HD	TR	_____
10/12/21	8598586	Advise Receiver regarding investor claim issues (.5) call/emails with CPA for investors re: pre-receivership tax issues (.6)	Fates, Edward (Ted)	1.10	707.85	7,245.90	WO	HD	TR	_____

09/15/22 09:31:17 PROFORMA STATEMENT FOR MATTER 378827.00006 (Krista Freitag, as Receiver for ANI Deve) (SEC v. Champion-Cain - Claims & Distribu)

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

Trans Date	Index	Description of Service Rendered	Timekeeper	Hours	Fees	Sum	Circle Action			
10/14/21	8611102	Analyze order approving claim procedures and advise Receiver re: same (.3) communications with G. Rodriguez re: resolution of small claims matter (.4)	Fates, Edward (Ted)	0.70	450.45	7,696.35	WO	HD	TR	_____
10/15/21	8611105	Discuss issues regarding claim notices and procedures with Receiver (.6) work on release agreement for small claims matter, discuss same with G. Rodriguez (.8)	Fates, Edward (Ted)	1.40	900.90	8,597.25	WO	HD	TR	_____
10/18/21	8611109	Communications with J. Lance re: small claims / vacation rental deposit matter (.3) communications with G. Rodriguez re: same (.2) address media inquiry regarding claims process, discuss same with Receiver (.4)	Fates, Edward (Ted)	0.90	579.15	9,176.40	WO	HD	TR	_____
10/19/21	8611114	Work on response to media inquiries regarding claims process and related issues (.8) call/emails with Receiver and PR consultant re: same (.6) analysis of draft claim notices and forms (.6) analyze media article relating to claims process (.2)	Fates, Edward (Ted)	2.20	1,415.70	10,592.10	WO	HD	TR	_____
10/20/21	8611118	Call with Receiver to discuss unique claim calculation and noticing issues (1.6) work on language for claim notices to address unique claim issues and circumstances (.9)	Fates, Edward (Ted)	2.50	1,608.75	12,200.85	WO	HD	TR	_____
10/21/21	8606489	Communications with Receiver and counsel for investors re: contact information for investors for claim notices (2.1) discuss issues re: unique investor claims with Receiver (.3)	Fates, Edward (Ted)	2.40	1,544.40	13,745.25	WO	HD	TR	_____

09/15/22 09:31:17 PROFORMA STATEMENT FOR MATTER 378827.00006 (Krista Freitag, as Receiver for ANI Deve) (SEC v. Champion-Cain - Claims & Distribu)

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

Trans Date	Index	Description of Service Rendered	Timekeeper	Hours	Fees	Sum	Circle	Action	
10/25/21	8609676	Communications with G. Rodriguez and J. Lance re: small claims matter relating to vacation rental properties	Fates, Edward (Ted)	0.40	257.40	14,002.65	WO	HD	TR
10/27/21	8612650	Discuss claim noticing issues with Receiver (.3) communications with counsel for investors re: address issues for claim notices (.3) communications with J. Lance re: settlement approval motion (.2)	Fates, Edward (Ted)	0.80	514.80	14,517.45	WO	HD	TR
10/28/21	8614342	Advise Receiver re: unique/specific claims and noticing issues (.9) revisions to general and specific claim notice email/cover letters to investor claimants (1.3)	Fates, Edward (Ted)	2.10	1,351.35	15,868.80	WO	HD	TR
10/29/21	8615301	Advise Receiver re: responses to unique investor inquiries (.2) calls/emails with Receiver and A. Herren re: investor noticing and address issues (2.1) revisions to claims notice/instructions (.4) communications with counsel for investors re: same (.5)	Fates, Edward (Ted)	3.20	2,059.20	17,928.00	WO	HD	TR
11/01/21	8641846	Advise Receiver on claims and noticing issues for mass mailing	Fates, Edward (Ted)	0.50	321.75	18,249.75	WO	HD	TR
11/02/21	8641854	Calls/emails with Receiver and A. Herren re: claims noticing issues (1.7) communications with counsel for investors re: same (.6) prepare notice to investors' counsel re: sending of claim notices and procedures (.7) revisions to website posting regarding claims process and forms (.4) discuss same with Receiver (.3)	Fates, Edward (Ted)	3.70	2,380.95	20,630.70	WO	HD	TR
11/03/21	8623266	Revisions to claim instructions for posting to website (.4) discuss same with Receiver	Fates, Edward (Ted)	0.90	579.15	21,209.85	WO	HD	TR

09/15/22 09:31:17 PROFORMA STATEMENT FOR MATTER 378827.00006 (Krista Freitag, as Receiver for ANI Deve) (SEC v. Champion-Cain - Claims & Distribu)

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

Trans Date	Index	Description of Service Rendered (.2) communications with Receiver and counsel for investors re: investor contact information (.3)	Timekeeper	Hours	Fees	Sum	Circle	Action	
11/04/21	8641863	Communications with Receiver and counsel for investors re: claim notices and website postings (1.1) discuss specific claim issues with Receiver (.4)	Fates, Edward (Ted)	1.50	965.25	22,175.10	WO	HD	TR
11/05/21	8627420	Advise Receiver on unique claim processing and noticing issues (.6) analyze claim and settlement demand from counsel for Luu in pending state court employment action (.7)	Fates, Edward (Ted)	1.30	836.55	23,011.65	WO	HD	TR
11/08/21	8627421	Initial work on response to claim and settlement demand from counsel for P. Luu (1.2) discuss same with Receiver (.6)	Fates, Edward (Ted)	1.80	1,158.30	24,169.95	WO	HD	TR
11/08/21	8630090	Analysis of the legal issues and Receiver response to labor case, letter, related issues as to claimant-Luce and prospective class (.7). Email to counsel addressing the Receiver's response to claims and legal strategy (.4).	Zaro, David	1.10	920.70	25,090.65	WO	HD	TR
11/09/21	8630140	Work on response to claim and settlement demand from counsel for P. Luu (1.7) discuss same with Receiver (.3) advise Receiver re: order approving J. Lance settlement (.2) communications with J. Lance re: same and remaining claim against receivership estate (.6)	Fates, Edward (Ted)	2.90	1,866.15	26,956.80	WO	HD	TR
11/10/21	8630111	Advise Receiver on unique investor claims and noticing issues (.3) discuss revisions to	Fates, Edward (Ted)	0.50	321.75	27,278.55	WO	HD	TR

09/15/22 09:31:17 PROFORMA STATEMENT FOR MATTER 378827.00006 (Krista Freitag, as Receiver for ANI Deve) (SEC v. Champion-Cain - Claims & Distribu)

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

Trans Date	Index	Description of Service Rendered	Timekeeper	Hours	Fees	Sum	Circle	Action	
		letter to counsel for P. Luu with Receiver (.2)							
11/10/21	8632717	Review revisions as to the Luu claim and Receiver's response to demands, advice related to Receiver letter (.5). Address emails related to D Street escrow funds and Receiver's claim to funds (.2).	Zaro, David	0.70	585.90	27,864.45	WO	HD	TR _____
11/11/21	8632749	Several emails related to the TriCorp matter, the escrow amount ad to the Receiver demand.	Zaro, David	0.30	251.10	28,115.55	WO	HD	TR _____
11/18/21	8637966	Analyze and advise Receiver on accounting issues for investor claim calculation and inquiry relating to IRA accounts	Fates, Edward (Ted)	0.70	450.45	28,566.00	WO	HD	TR _____
11/19/21	8639358	TC and email with Fates re. tax issues.	Kraus, Katherine	0.50	348.75	28,914.75	WO	HD	TR _____
11/19/21	8639456	Communications with Receiver and counsel regarding tax issues relating to claims and prospective distributions from receivership estate	Fates, Edward (Ted)	0.80	514.80	29,429.55	WO	HD	TR _____
11/22/21	8641534	TC and email with Freitag and Fates regarding tax issues.	Kraus, Katherine	1.00	697.50	30,127.05	WO	HD	TR _____
11/22/21	8651138	Call/emails with Receiver and tax counsel to discuss tax issues relating to investor claims and distributions (.5) work on investor notice re: same (.3) advise Receiver and A. Herren re: unique claim analysis issues (.4)	Fates, Edward (Ted)	1.20	772.20	30,899.25	WO	HD	TR _____

09/15/22 09:31:17 PROFORMA STATEMENT FOR MATTER 378827.00006 (Krista Freitag, as Receiver for ANI Deve) (SEC v. Champion-Cain - Claims & Distribu)

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

Trans Date	Index	Description of Service Rendered	Timekeeper	Hours	Fees	Sum	Circle	Action		
11/29/21	8645934	Communications with Receiver and counsel for CalPrivate Bank re: claims notice and procedures (.3) advise Receiver on unique claim issues (.2) prepare reminder language for email to claimants (.4)	Fates, Edward (Ted)	0.90	579.15	31,478.40	WO	HD	TR	_____
11/30/21	8647687	Advise Receiver on responses to unique investor claim inquiries (.3) communications with Receiver and counsel for investor re: claim issues (.4)	Fates, Edward (Ted)	0.70	450.45	31,928.85	WO	HD	TR	_____
12/01/21	8653012	Advise Receiver on responses to unique investor claims inquiries (.2) communications with counsel for investor re: claim issues (.3)	Fates, Edward (Ted)	0.50	321.75	32,250.60	WO	HD	TR	_____
12/02/21	8653954	Respond to inquiries from counsel for investor re: claim notices	Fates, Edward (Ted)	0.20	128.70	32,379.30	WO	HD	TR	_____
12/03/21	8654570	Communications with A. Herren and counsel for investors re: claim forms and procedures (.5) communications with Receiver and counsel for investors re: reminder of claims submission deadline and related issues (.7)	Fates, Edward (Ted)	1.20	772.20	33,151.50	WO	HD	TR	_____
12/06/21	8656026	Assist Receiver with preparing responses to unique investor claim issues	Fates, Edward (Ted)	0.30	193.05	33,344.55	WO	HD	TR	_____
12/07/21	8657714	Advise Receiver on responses to unique investor claim inquiries and issues	Fates, Edward (Ted)	0.80	514.80	33,859.35	WO	HD	TR	_____
12/09/21	8659863	Respond to inquiries regarding claim procedures from counsel for investors, discuss same with Receiver (.7) assist Receiver in addressing claim calculation	Fates, Edward (Ted)	1.60	1,029.60	34,888.95	WO	HD	TR	_____

09/15/22 09:31:17 PROFORMA STATEMENT FOR MATTER 378827.00006 (Krista Freitag, as Receiver for ANI Deve) (SEC v. Champion-Cain - Claims & Distribu)

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

Trans Date	Index	Description of Service Rendered issues with counsel for applicable investors (.9)	Timekeeper	Hours	Fees	Sum	Circle	Action	
12/10/21	8660991	Assist Receiver in preparing responses to unique investor questions and issues re: claims process and related matters (.9) communications with counsel for investors re: claim calculation issues (.3)	Fates, Edward (Ted)	1.20	772.20	35,661.15	WO	HD	TR
12/14/21	8664632	Discuss unique investor claim calculation issues with Receiver (.2) communications with counsel for investors re: same (.2)	Fates, Edward (Ted)	0.40	257.40	35,918.55	WO	HD	TR
12/15/21	8665728	Assist Receiver in addressing investor claim issues related to settlement payments from CTC to investors	Fates, Edward (Ted)	0.40	257.40	36,175.95	WO	HD	TR
12/17/21	8668006	Advise Receiver and A. Herren in analyzing and addressing unique investor claim issues and correspondence with counsel for investors re: same (1.4) correspondence with counsel for investor (1.1)	Fates, Edward (Ted)	2.50	1,608.75	37,784.70	WO	HD	TR
12/20/21	8669773	Advise Receiver on unique investor claim issues regarding divorce and allocation of claim between former spouses, MIMO and rising tide, CTC settlement payments, etc.	Fates, Edward (Ted)	0.80	514.80	38,299.50	WO	HD	TR
12/21/21	8672270	Discuss unique claim issues re: CTC settlement payment amounts and related issues with Receiver (.8) communications with counsel for investor re: same (.4)	Fates, Edward (Ted)	1.20	772.20	39,071.70	WO	HD	TR
12/28/21	8676358	Respond to inquiry from counsel for investors re: claims process and 12/31 deadline	Fates, Edward (Ted)	0.30	193.05	39,264.75	WO	HD	TR

09/15/22 09:31:17 PROFORMA STATEMENT FOR MATTER 378827.00006 (Krista Freitag, as Receiver for ANI Deve) (SEC v. Champion-Cain - Claims & Distribu)

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

Trans Date	Index	Description of Service Rendered	Timekeeper	Hours	Fees	Sum	Circle	Action	
12/29/21	8677421	Advise Receiver re: unique investor claim issues	Fates, Edward (Ted)	0.30	193.05	39,457.80	WO	HD	TR
12/30/21	8678332	Discuss claim issues relating to Second Source Solutions with Receiver	Fates, Edward (Ted)	0.30	193.05	39,650.85	WO	HD	TR
12/31/21	8678932	Analyze contingent claim submitted by Merit Financial (.4) communications with counsel for D. Martinez re: claim submission issue (.3) initial analysis of claim of security interest made by CalPrivate Bank (.4)	Fates, Edward (Ted)	1.10	707.85	40,358.70	WO	HD	TR

Proforma Summary

Timekeeper

Number	Timekeeper	Hours	Rate	Amounts
000313	Zaro, David	2.30	837.00	1,925.10
001665	Fates, Edward (Ted)	58.10	643.50	37,387.35
002372	Kraus, Katherine	1.50	697.50	1,046.25
		61.90		\$40,358.70
Subtotal Fees				\$40,358.70
Discount				0.00
Total Fees				40,358.70
Total Disbursements				0.00

Attorney Billing Instructions

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

Billing Instructions

expires 6/30/2023: 10% off standard rates (automatic); no text editing; copies @ .10

09/15/22 09:31:17 PROFORMA STATEMENT FOR MATTER 378827.00006 (Krista Freitag, as Receiver for ANI Deve) (SEC v. Champion-Cain - Claims & Distribu)

Account Summary – As Of 09/15/22

	Fiscal YTD			Calendar YTD			LTD		
	Total	Fees	Disb.	Total	Fees	Disb.	Total	Fees	Disbursements
Worked	73,194.75	73,194.75	0.00	197,377.65	197,377.65	0.00	637,054.20	637,054.20	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	89,866.35	89,866.35	0.00	368,642.25	368,642.25	0.00
Collected	0.00	0.00	0.00	89,866.35	89,866.35	0.00	368,642.25	368,642.25	0.00
AR Write Off	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00
WIP	268,886.55	268,411.95	474.60						
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

09/15/22 09:31:21 PROFORMA STATEMENT FOR MATTER 378827.00008 (Krista Freitag, as Receiver for ANI Deve) (SEC v. Champion-Cain - Pending Litigatio)

Preliminary Billing Form

Billing Atty: 001665 - Fates, Edward (Ted) Matter #: 378827.00008 Client Name: Krista Freitag, as Receiver for ANI Deve
 Date of Last Billing: 05/17/22 Matter Name: SEC v. Champion-Cain - Pending Litigatio
 Proforma Number: 1180576
 Client/Matter Joint Group # 378827-1 Client Matter Number:

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

Trans Date	Index	Description of Service Rendered	Timekeeper	Hours	Fees	Sum	Circle	Action	
07/01/21	8496896	Analyze discovery and evidentiary issues for SunTrust case, communications with local counsel in FL re: same and mediation issues (.8) discuss same with Receiver (.3)	Fates, Edward (Ted)	1.10	707.85	707.85	WO	HD	TR
07/07/21	8499228	Communications with local counsel in FL re: mediation, hearing dates, and evidence re: Westlink damages (.5) communications with Receiver re: same (.2)	Fates, Edward (Ted)	0.70	450.45	1,158.30	WO	HD	TR
07/09/21	8501502	Calls with Receiver and local counsel in FL re: evidence supporting damage claims, discovery issues, and mediation issues/strategy in SunTrust matter	Fates, Edward (Ted)	1.90	1,222.65	2,380.95	WO	HD	TR
07/11/21	8524923	Review mediation brief and analyze damage issues for SunTrust case (.8) call with Receiver and local counsel in FL re: settlement demand and mediation strategy (.4)	Fates, Edward (Ted)	1.20	772.20	3,153.15	WO	HD	TR
07/12/21	8502835	Prepare for and attend mediation in SunTrust matter	Fates, Edward (Ted)	4.80	3,088.80	6,241.95	WO	HD	TR

09/15/22 09:31:21 PROFORMA STATEMENT FOR MATTER 378827.00008 (Krista Freitag, as Receiver for ANI Deve) (SEC v. Champion-Cain - Pending Litigatio)

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

Trans Date	Index	Description of Service Rendered	Timekeeper	Hours	Fees	Sum	Circle Action			
07/13/21	8507687	Call with counsel to assess outcome of mediation with Suntrust, evidentiary issues and strategy.	Zaro, David	0.40	334.80	6,576.75	WO	HD	TR	_____
07/15/21	8506334	Communications with Receiver and local counsel in FL re: evidentiary issues, discovery responses, and related issues	Fates, Edward (Ted)	0.50	321.75	6,898.50	WO	HD	TR	_____
07/16/21	8524958	Communications with local counsel in FL re: hearing in SunTrust case, verification of expert discovery responses, and next steps	Fates, Edward (Ted)	0.70	450.45	7,348.95	WO	HD	TR	_____
07/21/21	8511640	Analyze issues, strategy for FL litigation against SunTrust/Truist Bank, communications with local counsel re: same	Fates, Edward (Ted)	0.40	257.40	7,606.35	WO	HD	TR	_____
07/22/21	8513072	Analyze discovery and evidentiary issues in SunTrust case, discuss same with Receiver and local counsel in FL	Fates, Edward (Ted)	0.90	579.15	8,185.50	WO	HD	TR	_____
07/23/21	8513924	Communications with local counsel in FL	Fates, Edward (Ted)	0.10	64.35	8,249.85	WO	HD	TR	_____
07/26/21	8515192	Call/emails with Receiver and local counsel in FL re: evidence supporting damage claims and related issues	Fates, Edward (Ted)	1.40	900.90	9,150.75	WO	HD	TR	_____
07/28/21	8517574	Communications with Receiver and local counsel in FL re: damage claims and evidentiary issues for SunTrust case	Fates, Edward (Ted)	0.30	193.05	9,343.80	WO	HD	TR	_____
08/03/21	8527732	Call with local counsel in FL re: damages evidence and Receiver deposition for SunTrust matter	Fates, Edward (Ted)	0.40	257.40	9,601.20	WO	HD	TR	_____

09/15/22 09:31:21 PROFORMA STATEMENT FOR MATTER 378827.00008 (Krista Freitag, as Receiver for ANI Deve) (SEC v. Champion-Cain - Pending Litigatio)

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

Trans Date	Index	Description of Service Rendered	Timekeeper	Hours	Fees	Sum	Circle	Action	
08/04/21	8528777	Communications with Receiver and local counsel in FL re: SunTrust matter	Fates, Edward (Ted)	0.20	128.70	9,729.90	WO	HD	TR
08/05/21	8529531	Call with Receiver and local counsel in FL re: Receiver deposition in Sun Trust matter	Fates, Edward (Ted)	0.50	321.75	10,051.65	WO	HD	TR
08/10/21	8532795	Communications with local counsel in FL regarding scheduling of Receiver deposition for SunTrust matter.	Fates, Edward (Ted)	0.10	64.35	10,116.00	WO	HD	TR
08/12/21	8535487	Communications with counsel for Luu plaintiff re: stipulation to continue status conference and claims process to resolve claims in receivership	Fates, Edward (Ted)	0.50	321.75	10,437.75	WO	HD	TR
08/16/21	8538250	Communications with local counsel in FL re: expert fees	Fates, Edward (Ted)	0.20	128.70	10,566.45	WO	HD	TR
09/01/21	8555734	Communications with Receiver re: preparation for deposition in FL litigation against SunTrust	Fates, Edward (Ted)	0.20	128.70	10,695.15	WO	HD	TR
09/07/21	8560197	Analyze issues and review key documents for Receiver deposition in SunTrust litigation (.6) calls with Receiver and local counsel in Florida regarding Receiver preparation for deposition (.8)	Fates, Edward (Ted)	1.40	900.90	11,596.05	WO	HD	TR
09/08/21	8561563	Discuss issues relating to deposition in SunTrust case with Receiver	Fates, Edward (Ted)	0.20	128.70	11,724.75	WO	HD	TR
09/16/21	8569289	Communications with Receiver and local counsel in FL re: continuance of trial date	Fates, Edward (Ted)	0.20	128.70	11,853.45	WO	HD	TR

09/15/22 09:31:21 PROFORMA STATEMENT FOR MATTER 378827.00008 (Krista Freitag, as Receiver for ANI Deve) (SEC v. Champion-Cain - Pending Litigatio)

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

Trans Date	Index	Description of Service Rendered	Timekeeper	Hours	Fees	Sum	Circle	Action	
09/29/21	8582457	Communications with local counsel in FL and Receiver	Fates, Edward (Ted)	0.20	128.70	11,982.15	WO	HD	TR
09/30/21	8584006	Call with Receiver and local counsel in FL re: developments and strategy for SunTrust litigation	Fates, Edward (Ted)	0.40	257.40	12,239.55	WO	HD	TR
10/06/21	8591543	Communications with local counsel in FL re: evidence relating to damage claims in SunTrust case	Fates, Edward (Ted)	0.20	128.70	12,368.25	WO	HD	TR
10/08/21	8594022	Communications with Receiver re: non-binding arbitration in Florida case against SunTrust	Fates, Edward (Ted)	0.20	128.70	12,496.95	WO	HD	TR
10/11/21	8595797	Discuss discovery issues re: Florida case against SunTrust with Receiver	Fates, Edward (Ted)	0.20	128.70	12,625.65	WO	HD	TR
10/12/21	8597093	Discuss documentation re: damage claims for Westlink claims against SunTrust	Fates, Edward (Ted)	0.40	257.40	12,883.05	WO	HD	TR
11/01/21	8621150	Communications with Receiver and local counsel in FL re: discovery responses	Fates, Edward (Ted)	0.30	193.05	13,076.10	WO	HD	TR
11/04/21	8624407	Communications with Receiver and local counsel in FL re: discovery responses and litigation expenses (.4) review draft discovery responses and questions related thereto (.5)	Fates, Edward (Ted)	0.90	579.15	13,655.25	WO	HD	TR
11/05/21	8625308	Call with Receiver and local counsel in FL re: responses to SunTrust written discovery	Fates, Edward (Ted)	0.50	321.75	13,977.00	WO	HD	TR
11/15/21	8633951	Call/emails with local counsel in FL re: arbitration in pending action against	Fates, Edward (Ted)	0.70	450.45	14,427.45	WO	HD	TR

09/15/22 09:31:21 PROFORMA STATEMENT FOR MATTER 378827.00008 (Krista Freitag, as Receiver for ANI Deve) (SEC v. Champion-Cain - Pending Litigatio)

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

Trans Date	Index	Description of Service Rendered SunTrust	Timekeeper	Hours	Fees	Sum	Circle	Action	
11/16/21	8641896	Analyze special verdict form and exhibits for non-binding arbitration in SunTrust action, communications with Receiver and local counsel in FL re: same (.7) discuss expert witness cost issues with Receiver (.2)	Fates, Edward (Ted)	0.90	579.15	15,006.60	WO	HD	TR _____
11/19/21	8639329	Analyze non-binding arbitration ruling, communications with Receiver and local counsel in Florida re: same	Fates, Edward (Ted)	0.50	321.75	15,328.35	WO	HD	TR _____
11/23/21	8651165	Calls/emails with Receiver and local counsel in FL regarding non-binding arbitration verdict and strategy/next steps	Fates, Edward (Ted)	0.70	450.45	15,778.80	WO	HD	TR _____
12/03/21	8654852	Communications with Receiver and local counsel in FL regarding tentative settlement and Court approval of same	Fates, Edward (Ted)	0.50	321.75	16,100.55	WO	HD	TR _____
12/06/21	8657129	Initial review of proposed settlement agreement, discuss same with Receiver	Fates, Edward (Ted)	0.40	257.40	16,357.95	WO	HD	TR _____
12/07/21	8657138	Work on proposed revisions to settlement agreement with SunTrust (.7) discuss same with Receiver (.2) discuss same with local counsel in FL (.2)	Fates, Edward (Ted)	1.10	707.85	17,065.80	WO	HD	TR _____
12/08/21	8658625	Communications with local counsel in FL re: settlement terms and court approval of same (.7) work on ex parte application for approval of settlement (1.2)	Fates, Edward (Ted)	1.90	1,222.65	18,288.45	WO	HD	TR _____
12/09/21	8659995	Communications with Receiver and local counsel in FL re: continuance of trial date, execution of settlement agreement, and	Fates, Edward (Ted)	1.70	1,093.95	19,382.40	WO	HD	TR _____

09/15/22 09:31:21 PROFORMA STATEMENT FOR MATTER 378827.00008 (Krista Freitag, as Receiver for ANI Deve) (SEC v. Champion-Cain - Pending Litigatio)

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

Trans Date	Index	Description of Service Rendered	Timekeeper	Hours	Fees	Sum	Circle	Action
		motion for approval of same (.6) work on motion for approval of settlement (.7) discuss same with Receiver (.3)						
12/10/21	8662676	Work on Receiver declaration in support of motion to approve settlement agreement (.8) discuss same with Receiver (.3) work on notice of motion and proposed order (.4)	Fates, Edward (Ted)	1.50	965.25	20,347.65	WO	HD TR
12/13/21	8663219	Discuss revisions to Receiver declaration in support of settlement approval motion with Receiver (.4) work on same (.3) call with Court clerk re: hearing date for motion (.1) meet and confer with SEC counsel re: motion (.2) finalize motion and declaration (.3)	Fates, Edward (Ted)	1.30	836.55	21,184.20	WO	HD TR

Proforma Summary

Timekeeper Number	Timekeeper	Hours	Rate	Amounts
000313	Zaro, David	0.40	837.00	334.80
001665	Fates, Edward (Ted)	32.40	643.50	20,849.40
		32.80		\$21,184.20
Subtotal Fees				\$21,184.20
Discount				0.00
Total Fees				21,184.20
Total Disbursements				0.00

Attorney Billing Instructions

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

Billing Instructions

09/15/22 09:31:21 PROFORMA STATEMENT FOR MATTER 378827.00008 (Krista Freitag, as Receiver for ANI Deve) (SEC v. Champion-Cain - Pending Litigatio)

expires 6/30/2023: 10% off standard rates (automatic); no text editing; copies @ .10

Account Summary – As Of 09/15/22

	Fiscal YTD			Calendar YTD			LTD		
	Total	Fees	Disb.	Total	Fees	Disb.	Total	Fees	Disbursements
Worked	0.00	0.00	0.00	579.15	579.15	0.00	58,525.65	58,525.65	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	2,873.25	2,873.25	0.00	33,151.50	33,151.50	0.00
Collected	0.00	0.00	0.00	2,873.25	2,873.25	0.00	33,151.50	33,151.50	0.00
AR Write Off	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00
WIP	Total	Fees	Costs						
Balance	25,374.15	25,374.15	0.00						
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

09/15/22 09:31:22 PROFORMA STATEMENT FOR MATTER 378827.00009 (Krista Freitag, as Receiver for ANI Deve) (SEC v. Champion-Cain - Employment/Fees)

Preliminary Billing Form

Billing Atty: 001665 - Fates, Edward (Ted) Matter #: 378827.00009 Client Name: Krista Freitag, as Receiver for ANI Deve
 Date of Last Billing: 05/17/22 Matter Name: SEC v. Champion-Cain - Employment/Fees
 Proforma Number: 1180576
 Client/Matter Joint Group # 378827-1 Client Matter Number:

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

Trans Date	Index	Description of Service Rendered	Timekeeper	Hours	Fees	Sum	Circle	Action	
07/06/21	8498679	Analyze forensic data collection charges for Receiver's 5th fee application and discuss with Receiver	Fates, Edward (Ted)	0.40	257.40	257.40	WO	HD	TR
07/07/21	8499742	Discuss forensic costs for Receiver fee application with Receiver	Fates, Edward (Ted)	0.20	128.70	386.10	WO	HD	TR
10/01/21	8586894	Revisions to Receiver's 5th interim fee application, discuss same and issues re: forensic data costs with Receiver	Fates, Edward (Ted)	1.30	836.55	1,222.65	WO	HD	TR
10/05/21	8590723	Meet and confer communications with SEC regarding 5th interim fee applications	Fates, Edward (Ted)	0.20	128.70	1,351.35	WO	HD	TR
10/11/21	8595983	Follow up communications with SEC counsel re: fifth interim fee applications	Fates, Edward (Ted)	0.10	64.35	1,415.70	WO	HD	TR
10/12/21	8598496	Revise and finalize Receiver's fifth fee application, notice of hearing, proposed order (.4) communications with court clerk re: hearing date (.1)	Fates, Edward (Ted)	0.50	321.75	1,737.45	WO	HD	TR

09/15/22 09:31:22 PROFORMA STATEMENT FOR MATTER 378827.00009 (Krista Freitag, as Receiver for ANI Deve) (SEC v. Champion-Cain - Employment/Fees)

Proforma Summary

Timekeeper

Number	Timekeeper	Hours	Rate	Amounts
001665	Fates, Edward (Ted)	2.70	643.50	1,737.45
		2.70		\$1,737.45
Subtotal Fees				\$1,737.45
Discount				0.00
Total Fees				1,737.45
Total Disbursements				0.00

Attorney Billing Instructions

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

Billing Instructions

expires 6/30/2023: 10% off standard rates (automatic); no text editing; copies @ .10

Account Summary – As Of 09/15/22

	Fiscal YTD			Calendar YTD			LTD		
	Total	Fees	Disb.	Total	Fees	Disb.	Total	Fees	Disbursements
Worked	1,239.30	1,239.30	0.00	2,912.40	2,912.40	0.00	11,299.05	11,299.05	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	979.20	979.20	0.00	5,547.60	5,547.60	0.00
Collected	0.00	0.00	0.00	979.20	979.20	0.00	5,547.60	5,547.60	0.00
AR Write Off	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00
WIP	5,751.45	5,751.45	0.00						
Balance									
AR Balance	0.00	0.00	0.00						
Unalloc	0.00								
Payment									
Client Trust	0.00								
Balance									

09/15/22 09:31:22 PROFORMA STATEMENT FOR MATTER 378827.00009 (Krista Freitag, as Receiver for ANI Deve) (SEC v. Champion-Cain - Employment/Fees)

Billing Address

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