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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

**NINTH 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: February 27, 2023
Time: 11:30 a.m.
Courtroom: 14A
Judge: Hon. Larry A. Burns

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1 Allen Matkins Leck Gamble Mallory & Natsis LLP ("Allen Matkins"),
 2 general counsel to Krista L. Freitag (the "Receiver"), the Court-appointed receiver
 3 for ANI Development, LLC, American National Investments, Inc. ("ANI"), and
 4 their respective subsidiaries and affiliates (the "Receivership Entities"), hereby
 5 submits this Ninth Interim Application for Payment of Fees and Reimbursement of
 6 Expenses (the "Application"). This Application covers the six-month period from
 7 January 1, 2022 through June 30, 2022 (the "Application Period"), and seeks
 8 approval of \$552,586.50 in fees and \$42,642.24 in expenses, and an order
 9 authorizing the Receiver to pay, on an interim basis, 80% of the fees incurred
 10 (\$442,069.20) and 100% of the expenses incurred (\$42,642.24).

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 Tenth and Eleventh Interim Reports and Recommendations, filed on February 24, 2022 and June 14, 2022 (Dkt. 755, 816), which describe in detail the Receiver's activities during the six-month Application Period.

This Application seeks approval of \$552,586.50 in fees for a total of 1,265.40 hours worked, and payment on an interim basis of 80% of that amount, or \$442,069.20. 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	12.60	\$8,386.65
Asset Investigation & Recovery	9.50	\$5,292.45
Reporting	6.50	\$4,298.85
Claims & Distributions	190.20	\$129,833.10
Third Party Recoveries	28.70	\$22,357.80
Pending Litigation	0.90	\$579.15
Employment/Professional Fees	2.60	\$1,673.10
General Clawback Claims & Settlements	483.80	\$258,772.50
Claims Against Kim Peterson et al.	196.20	\$121,392.90
Total Fees	931.00	\$552,586.50

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 cases
 7 against Gina Champion-Cain and Cris Torres, including communications with the
 8 United States Attorney's Office and counsel for Gina Champion-Cain ("GCC")
 9 regarding restitution issues and attending the hearing on restitution held on June 13,
 10 2022. The reasonable and necessary fees for Allen Matkins' work in this category
 11 total \$8,386.65.

12 2. Asset Investigation & Recovery.

13 The services in this category relate generally to efforts to identify, secure,
 14 preserve, investigate and recover receivership assets. During the Application
 15 Period, these services focused on (a) securing a settlement of the insurance claim
 16 against the crime/theft insurance policy, (b) analyzing investments and loans made
 17 by the Receivership Entities and strategies for maximizing recovery from such
 18 assets, and (c) obtaining documents from third parties relevant to the Receiver's
 19 investigation and analysis. The reasonable and necessary fees for Allen Matkins'
 20 work in this category total \$5,292.45.

21 3. Reporting.

22 Allen Matkins' services in this category include assisting in preparing the
 23 Receiver's Tenth and Eleventh Interim Reports and Recommendations, which were
 24 filed on February 24, 2022 and June 14, 2022, respectively. Dkt. 755, 816. The
 25 reports includes detailed summaries of the Receiver's activities, funds recovered,
 26 real and personal property assets, restaurant and retail operations, property taxes,
 27 insurance, debt service, loans and other investments, investigation of third party
 28 claims, pending litigation, and other matters. The reports also detail the receipts and

1 disbursements for the receivership estate since the Receiver's appointment and
2 provides her recommendations for the continued administration of the receivership.
3 The reasonable and necessary fees for Allen Matkins' work in this category total
4 \$4,298.85.

5 4. Claims & Distributions.

6 Services rendered in this category generally relate to the claims and interests
7 of investors and creditors of the Receivership Entities. During the Application
8 Period, this work focused on assisting and advising the Receiver in implementing
9 the Court-approved claims process, including advising on and addressing various
10 unique issues relating to investor and creditor claims, and gathering information
11 from counsel for investors and counsel for Chicago Title regarding settlement
12 payments made to investors on account of their losses from the Ponzi scheme. The
13 firm also communicated with counsel for Chicago Title regarding settlements with
14 investors groups, and advised the Receiver regarding such settlements and related
15 motions for approval of such settlements by this Court and the San Diego Superior
16 Court.

17 Allen Matkins assisted the Receiver in analyzing investor and creditor claims
18 in the receivership, preparing objections to certain claims, communicating with
19 counsel for the applicable claimants, and efforts to resolve disputes relating to
20 claims. These efforts were successful in streamlining the ultimate motion to
21 approve claim amounts (which is discussed below), which motion only involved two
22 (2) disputed claims needing to be resolved out of the approximately 300 investors
23 and numerous creditors with claims in the receivership.

24 Allen Matkins also advised on and assisted the Receiver in preparing her
25 motion (a) for approval of recommended allowed amounts of claims, (b) to resolve
26 disputed claims, and (c) for approval of her proposed Distribution Plan. Dkt. 807.
27 The motion, 35-page memorandum, detailed supporting declaration, and exhibits
28 were filed on May 31, 2022. *Id.*

1 Allen Matkins also assisted with issues related to disseminating information
 2 about the receivership to investors and creditors, including information provided on
 3 the receivership website (www.anireceivership.com). The firm also assisted in
 4 responding to direct inquiries from investors and creditors. The reasonable and
 5 necessary fees for Allen Matkins' work in this category total \$129,833.10

6 5. Third Party Recoveries.

7 This portion of the Application pertains to work on potential claims against
 8 third parties to recover amounts for the benefit of the receivership estate. Due to the
 9 confidential nature of the legal work on these matters and the Receiver's litigation
 10 strategy vis-à-vis third parties, the Receiver has filed a motion concurrently herewith
 11 to file this portion of the Application under seal. The reasonable and necessary fees
 12 for Allen Matkins' work in this category total \$22,357.80.

13 6. Pending Litigation.

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

23 Allen Matkins also assisted with issues relating to the action pending in San
 24 Diego Superior Court known as *Luu v. The Patio Restaurant Grp., LLC, et al.*, San
 25 Diego Super. Ct. Case No. 37-2019-00015451-CU-OE-CTL, which is a putative
 26 class action filed by a former employee (which action is now stayed pursuant to the
 27 litigation stay in the Appointment Order). The reasonable and necessary fees for
 28 Allen Matkins' work in this category total \$579.15.

1 7. Employment/Professional Fees

2 Although fee applications are a necessary component of federal equity
3 receiverships, neither the Receiver nor her professionals charge for time spent
4 preparing their own detailed applications. Allen Matkins assisted in preparing the
5 Receiver's Sixth and Seventh Interim Fee Applications and with meet and confer
6 communications with counsel for the Commission. The fee applications were filed
7 on February 16, 2022 and May 20, 2022 (Dkt. 746, 790) and approved on May 9,
8 2022, and October 7, 2022. Dkt. 779, 917. The reasonable and necessary fees for
9 Allen Matkins' work in this category total \$1,673.10.

10 8. General Clawback Claims & Settlements.

11 This portion of the Application pertains to work on clawback claims against
12 third parties and settlements to recover amounts for the benefit of the receivership
13 estate. Due to the confidential nature of the legal work on these matters and the
14 Receiver's litigation strategy vis-à-vis third parties, the Receiver has filed a motion
15 concurrently herewith to file this portion of the Application under seal. The
16 reasonable and necessary fees for Allen Matkins' work in this category total
17 \$258,772.50. To date, the Receiver has recovered more than \$8.5 million for the
18 receivership estate through the pursuit of clawback claims.

19 9. Claims Against Kim Peterson.

20 This portion of the Application pertains to work on claims against Kim
21 Peterson and his entities to recover amounts for the benefit of the receivership
22 estate. Due to the confidential nature of the legal work on this matters and the
23 Receiver's litigation strategy vis-à-vis third parties, the Receiver has filed a motion
24 concurrently herewith to file this portion of the Application under seal. The
25 reasonable and necessary fees for Allen Matkins' work in this category total
26 \$121,392.90. Kim Peterson and his entities, collectively, are the largest net winner
27 in the Ponzi scheme, having received more in \$12.7 million in net profits.

28

A. Summary of Expenses Requested for Reimbursement.

Allen Matkins requests that the Court approve reimbursement of \$42,642.24 in out-of-pocket costs. The itemization of such expenses is summarized below by billing category.

Category	Total
Deposition/Court Transcript Fees	\$11,501.45
Messenger/FedEx Fees	\$268.37
Service of Process	\$1,559.44
Recordation Fees	\$1,342.00
Court/Filing Fees	\$2,774.05
Mediation Fees	\$4,693.80
Duplication	\$331.40
PACER/Document Research	\$6,113.55
E-Discovery	\$14,058.18
Total	\$42,642.24

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

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

In allowing fees, a court should consider "the time, labor and skill required, but not necessarily that actually expended, in the proper performance of the duties imposed by the court upon the receiver . . . , the fair value of such time, labor and skill measured by conservative business standards, the degree of activity, integrity

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

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

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

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

1 of issues presented. As noted above, the request for fees is based on Allen Matkins'
 2 customary billing rates charged for comparable services provided in other matters,
 3 less a 10% discount. Moreover, Allen Matkins wrote off and did not charge for
 4 6.3 hours of work (\$4,054.05 in fees).

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

15 **III. CONCLUSION.**

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

- 17 1. Approving Allen Matkins' fees of \$552,586.50;
- 18 2. Authorizing and directing the Receiver to pay 80% of approved fees, or
 19 \$442,069.20, from the assets of the Receivership Entities;
- 20 3. Approving Allen Matkins' costs in the amount of \$42,642.24, and
 21 authorizing and directing the Receiver to reimburse such costs in full; and
- 22 4. For such other and further relief as the Court deems appropriate.

23 Dated: January 25, 2023

ALLEN MATKINS LECK GAMBLE
 MALLORY & NATSIS LLP

24 By: s/Edward G. Fates

25 DAVID R. ZARO
 26 EDWARD G. FATES
 27 MATTHEW D. PHAM
 Attorneys for Receiver
 28 KRISTA FREITAG

EXHIBIT INDEX

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

EXHIBIT A

EXHIBIT A

09/23/22 17:26:02 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: 1180820

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	
01/05/22	8685422	Analyze and advise Receiver re: responses to local media inquiries	Fates, Edward (Ted)	0.70	450.45	450.45	WO	HD	TR
01/06/22	8686166	Analyze local news article on CTC litigation, clawback litigation and related issues (.2) communications with Receiver and PR consultant re: same (.5)	Fates, Edward (Ted)	0.70	450.45	900.90	WO	HD	TR
01/11/22	8690702	TC with McDevitt, Freitag, Harris and Fates regarding tax issues.	Kraus, Katherine	0.50	348.75	1,249.65	WO	HD	TR
03/10/22	8754368	Advise Receiver re: response to media inquiry concerning case and accounting	Fates, Edward (Ted)	0.40	257.40	1,507.05	WO	HD	TR
03/14/22	8757709	Advise Receiver re: response to media inquiry regarding Champion-Cain assets	Fates, Edward (Ted)	0.20	128.70	1,635.75	WO	HD	TR
03/15/22	8759489	Advise Receiver re: responses to further media inquiries	Fates, Edward (Ted)	0.20	128.70	1,764.45	WO	HD	TR
03/17/22	8761419	Respond to inquiry from CA insurance regulator relating to Chicago Title	Fates, Edward (Ted)	0.20	128.70	1,893.15	WO	HD	TR

09/23/22 17:26:02 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		
03/22/22	8765433	Discuss hack of receivership email account and response to same with Receiver	Fates, Edward (Ted)	0.60	386.10	2,279.25	WO	HD	TR	_____
03/25/22	8769790	Advise Receiver on issues related to hack of receivership email account and steps to address same	Fates, Edward (Ted)	0.40	257.40	2,536.65	WO	HD	TR	_____
04/12/22	8793242	Several emails/call with counsel related to Champion-Cain calculation related to restitution, follow-up.	Zaro, David	0.30	251.10	2,787.75	WO	HD	TR	_____
04/13/22	8792126	Communications with counsel for Champion-Cain relating to criminal restitution	Fates, Edward (Ted)	0.20	128.70	2,916.45	WO	HD	TR	_____
04/14/22	8793138	Call with counsel for Champion-Cain re: criminal restitution and related issues	Fates, Edward (Ted)	0.40	257.40	3,173.85	WO	HD	TR	_____
04/14/22	8797490	Emails, prepare for/attend the meeting with defendant counsel related to restitution claim.	Zaro, David	0.60	502.20	3,676.05	WO	HD	TR	_____
04/18/22	8795571	Communications with SEC counsel re: issues relating to Champion-Cain taxes and frozen funds	Fates, Edward (Ted)	0.20	128.70	3,804.75	WO	HD	TR	_____
04/29/22	8810404	Discuss response to media inquiry re: American Greed television show with Receiver	Fates, Edward (Ted)	0.30	193.05	3,997.80	WO	HD	TR	_____
05/10/22	8823064	Call with AUSA re: issues relating to criminal restitution hearing and timing of receivership claims process	Fates, Edward (Ted)	0.30	193.05	4,190.85	WO	HD	TR	_____
05/19/22	8832952	Review orders in related criminal cases requiring attendance at restitution hearing	Fates, Edward (Ted)	0.20	128.70	4,319.55	WO	HD	TR	_____

09/23/22 17:26:02 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 and discuss same with Receiver	Timekeeper	Hours	Fees	Sum	Circle Action			
05/31/22	8849729	Communications with AUSA relating to restitution issues	Fates, Edward (Ted)	0.20	128.70	4,448.25	WO	HD	TR	_____
06/02/22	8867559	Advise Receiver re: responses to media inquiries	Fates, Edward (Ted)	0.30	193.05	4,641.30	WO	HD	TR	_____
06/06/22	8867897	Communications with AUSA regarding restitution and claims process (.3) advise Receiver on issues relating to tax returns and closing of certain receivership entities (.4)	Fates, Edward (Ted)	0.70	450.45	5,091.75	WO	HD	TR	_____
06/07/22	8867911	Call with AUSA on issues relating to restitution in related criminal cases against Champion-Cain and Torres (.6) discuss same with Receiver (.2)	Fates, Edward (Ted)	0.80	514.80	5,606.55	WO	HD	TR	_____
06/09/22	8867924	Discuss investor victim restitution information requested by AUSA with Receiver	Fates, Edward (Ted)	0.40	257.40	5,863.95	WO	HD	TR	_____
06/10/22	8858984	Review investor claims schedules and information relevant to criminal restitution hearing on 6/13 (.4) calls/emails with Receiver and AUSA re: same (.9)	Fates, Edward (Ted)	1.30	836.55	6,700.50	WO	HD	TR	_____
06/13/22	8860905	Prepare for and attend restitution hearing in Champion-Cain and Torres criminal matters (1.8) discuss same with Receiver (.3)	Fates, Edward (Ted)	2.10	1,351.35	8,051.85	WO	HD	TR	_____
06/13/22	8863815	Call with counsel related to criminal proceedings and address impact on receivership, next steps, Receiver accounting as to damages.	Zaro, David	0.40	334.80	8,386.65	WO	HD	TR	_____

09/23/22 17:26:02 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
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Disbursements for Matter 378827.00002 (SEC v. Champion-Cain - General Receivers)

Trans Date	Index	Type	Quantity	Amt	WO	HD	TR	
01/01/22	2749977	EDISC – CS Disco, Inc. - Monthly Hosting for January 2023	0.00	2,343.03	WO	HD	TR	_____
01/03/22	2747118	BW – Duplication - Black & White Copies	646.00	64.60	WO	HD	TR	_____
01/03/22	2747119	COLOR – Duplication - Color Copies	1.00	0.10	WO	HD	TR	_____
01/03/22	2747567	COURT – -San Diego Superior Court,Obtain copy of Notice of Rulings from Court docket.	0.00	6.20	WO	HD	TR	_____
01/05/22	2750882	RSRCH – WestLaw	0.00	156.40	WO	HD	TR	_____
01/06/22	2750883	RSRCH – WestLaw	0.00	110.20	WO	HD	TR	_____
01/06/22	2761169	DCSRCH – Document Search - - PACER - 10/21 - 12/21 Usage	0.00	11.30	WO	HD	TR	_____
01/06/22	2761170	DCSRCH – Document Search - - PACER - 10/21 - 12/21 Usage	0.00	3.60	WO	HD	TR	_____
01/06/22	2761171	DCSRCH – Document Search - - PACER - 10/21 - 12/21 Usage	0.00	4.70	WO	HD	TR	_____
01/06/22	2761172	DCSRCH – Document Search - - PACER - 10/21 - 12/21 Usage	0.00	6.20	WO	HD	TR	_____
01/07/22	2749729	FILING – Nationwide Legal, LLC - SAN DIEGO/SAN DIEGO SUPERIOR COURT, Summons; Complaint; Civil Case Cover Sheet; Notice of Related case	0.00	486.05	WO	HD	TR	_____
01/13/22	2749685	POS – Nationwide Legal, LLC - CHICAGO TITLE COMPANY, Summons; Complaint; Alternative Dispute (ADR) package; Civil Case Cover Sheet; Notice of Case Assignment and Case Management Conference; Notice of Related Case; Minute Order	0.00	184.45	WO	HD	TR	_____

09/23/22 17:26:02 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	
01/13/22	2749686	POS – Nationwide Legal, LLC - CHICAGO TITLE INSURANCE COMPANY, Summons; Complaint; Alternative Dispute (ADR) package; Civil Case Cover Sheet; Notice of Case Assignment; Case, Management Conference; Notice of Related Case; Minute Order	0.00	83.45	WO	HD	TR	_____
01/14/22	2754061	FILING – Filing Fees - Nationwide Legal LLC - SAN DIEGO/SAN DIEGO SUPERIOR COURT 2 PROOFS OF SERVICE	0.00	38.00	WO	HD	TR	_____
01/20/22	2749760	COURT – -San Diego Superior Court,Obtain copy of December 17, 2021 Minute Order from Court docket.	0.00	2.00	WO	HD	TR	_____
01/21/22	2749259	MEDIT – Judicate West - Two Day Mediation	0.00	2,480.00	WO	HD	TR	_____
01/21/22	2750884	RSRCH – WestLaw	0.00	207.20	WO	HD	TR	_____
01/25/22	2750022	BW – Duplication - Black & White Copies	50.00	5.00	WO	HD	TR	_____
01/25/22	2752141	FILING – -Heather Riley,COURTS/USDC-CAS-Filing fee for Dean Libs Complaint	0.00	402.00	WO	HD	TR	_____
01/25/22	2753937	POS – Service of Process - First Legal - DEAN LIBS; COMPLAINT; SUMMONS; CCC SHEET	0.00	143.61	WO	HD	TR	_____
01/25/22	2753938	POS – Service of Process - First Legal - DEAN LIBS INC.; COMPLAINT; SUMMONS; CCC SHEET	0.00	258.53	WO	HD	TR	_____
01/26/22	2750126	DEPO – Veritext, LLC - Deposition Transcript of Gina Champion-Cain Taken on 01/18/2022	0.00	2,262.80	WO	HD	TR	_____
01/26/22	2751480	COURT – -San Diego Superior Court,Obtain copy of Chicago Title's Notice from Court's docket.	0.00	6.60	WO	HD	TR	_____
01/26/22	2753939	POS – Service of Process - First Legal - DEAN LIBS an individual; SUMMONS IN A CIVIL ACTION; COMPLAINT FOR FRAUDULENT TRAN	0.00	143.61	WO	HD	TR	_____
01/27/22	2754704	RSRCH – Lexis	0.00	99.00	WO	HD	TR	_____
01/27/22	2754705	RSRCH – Lexis	0.00	21.20	WO	HD	TR	_____
01/31/22	2754393	RSRCH – WestLaw	0.00	58.40	WO	HD	TR	_____

09/23/22 17:26:02 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				
02/01/22	2753885	EDISC – CS Disco, Inc. - Monthly Hosting for February 2022	0.00	2,343.03	WO	HD	TR	_____
02/02/22	2751352	MEDIT – JAMS, Inc. - Deposit for services - Hon. Raymond J. Ikola	0.00	478.80	WO	HD	TR	_____
02/02/22	2754391	RSRCH – WestLaw	0.00	297.20	WO	HD	TR	_____
02/03/22	2754392	RSRCH – WestLaw	0.00	482.80	WO	HD	TR	_____
02/04/22	2763160	DCSRCH – Research - First Legal -USDC-LOS ANGELES (255 E. TEMPLE) ; Allen Matkins ; Court Docket	0.00	236.71	WO	HD	TR	_____
02/07/22	2751496	MEDIT – Judicate West - Review/Preparation	0.00	495.00	WO	HD	TR	_____
02/07/22	2753395	POS – First Legal Network, LLC - JENNIFER COPP; SUMMONS; COMPLAINT AND CC SHEET	0.00	331.23	WO	HD	TR	_____
02/09/22	2754702	RSRCH – Lexis	0.00	39.60	WO	HD	TR	_____
02/10/22	2752853	COURT – -San Diego Superior Court,Obtain copies of Minute Orders from Court docket.	0.00	5.00	WO	HD	TR	_____
02/10/22	2752854	COURT – -San Diego Superior Court,Obtain copies of motions from Court docket.	0.00	43.40	WO	HD	TR	_____
02/15/22	2752334	BW – Duplication - Black & White Copies	461.00	46.10	WO	HD	TR	_____
02/15/22	2758590	POS – Service of Process - First Legal Network, LLC - FIRST AMERICAN TITLE INSURANCE CO.; SUBPOENA TO PRODUCE	0.00	118.81	WO	HD	TR	_____
02/15/22	2758591	POS – Service of Process - First Legal Network, LLC - WESTERN TITLE & ESCROW CO; SUBPOENA TO PRODUCE	0.00	295.75	WO	HD	TR	_____
02/16/22	2752414	STATU – One Legal - Filing Fees for Superior Court of California, San Diego County - Notice of Related Case, Proof of Service	0.00	12.00	WO	HD	TR	_____
02/16/22	2752637	BW – Duplication - Black & White Copies	264.00	26.40	WO	HD	TR	_____

09/23/22 17:26:02 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				
02/16/22	2752855	COURT – -San Diego Superior Court,Obtain copy of February 15, 2022 Minute Order	0.00	2.00	WO	HD	TR	_____
02/16/22	2752856	COURT – -San Diego Superior Court,Obtain copy of pleadings from Court's docket	0.00	12.00	WO	HD	TR	_____
02/16/22	2752857	COURT – -San Diego Superior Court,Obtain copies of February 15, 2022 Minute Orders	0.00	3.00	WO	HD	TR	_____
02/16/22	2754394	RSRCH – WestLaw	0.00	87.60	WO	HD	TR	_____
02/16/22	2754706	RSRCH – Lexis	0.00	38.00	WO	HD	TR	_____
02/17/22	2752735	BW – Duplication - Black & White Copies	272.00	27.20	WO	HD	TR	_____
02/17/22	2752858	COURT – -San Diego Superior Court,Obtain copy of Complaint from Court's docket.	0.00	25.40	WO	HD	TR	_____
02/18/22	2752847	STATU – One Legal - Filing Fees for Superior Court of California, San Diego County - Notice of Related Case, Proof of Service	0.00	12.00	WO	HD	TR	_____
02/18/22	2754703	RSRCH – Lexis	0.00	95.00	WO	HD	TR	_____
02/22/22	2763161	DCSRCH – Research - First Legal - RESEARCH-BRANCH NEXT DAY; USBC-SANTA BARBARA ; Allen Matkins ; Court Docket	0.00	445.34	WO	HD	TR	_____
02/23/22	2753136	STATU – One Legal - Filing Fees for Superior Court of California, San Diego County - Ex Parte Application - Other and Supporting Documents, Proposed Order, Proof of Service	0.00	82.00	WO	HD	TR	_____
02/23/22	2754707	RSRCH – Lexis	0.00	10.60	WO	HD	TR	_____
02/23/22	2754708	RSRCH – Lexis	0.00	38.00	WO	HD	TR	_____
02/23/22	2758595	MSNGR – Messenger - First Legal Network, LLC - SDSC-SAN DIEGO; EX-PARTE APPL; PROP ORDER AND POS	0.00	64.75	WO	HD	TR	_____
02/24/22	2753613	BW – Duplication - Black & White Copies	6.00	0.60	WO	HD	TR	_____
02/24/22	2758827	RSRCH – WestLaw	0.00	29.20	WO	HD	TR	_____

09/23/22 17:26:02 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				
02/25/22	2753963	BW – Duplication - Black & White Copies	23.00	2.30	WO	HD	TR	_____
02/25/22	2755555	COURT – -San Diego Superior Court,Obtain copies of Notices from Court's docket for Chicago Title litigation.	0.00	4.00	WO	HD	TR	_____
02/25/22	2755556	COURT – -San Diego Superior Court,Obtain copy of February 24, 2022 Minute Order from Court's docket - Chicago Title Litigation	0.00	1.00	WO	HD	TR	_____
02/26/22	2754910	DEPO – Veritext, LLC - Deposition Transcript of Lisa Tyler Taken on 02/15/2022	0.00	1,719.65	WO	HD	TR	_____
02/27/22	2758824	RSRCH – WestLaw	0.00	34.40	WO	HD	TR	_____
02/28/22	2758825	RSRCH – WestLaw	0.00	34.40	WO	HD	TR	_____
03/01/22	2756197	EDISC – CS Disco, Inc. - Monthly Hosting for March 2022	0.00	2,343.03	WO	HD	TR	_____
03/03/22	2755443	DEPO – Veritext, LLC - Deposition Transcript of Betsy Chadwick Taken on 02/25/2022	0.00	1,727.20	WO	HD	TR	_____
03/03/22	2755557	COURT – -San Diego Superior Court,Obtain copy of Stipulation and Order from Court's Docket. - Chicago Title Litigation	0.00	9.00	WO	HD	TR	_____
03/03/22	2759123	RSRCH – Lexis	0.00	39.60	WO	HD	TR	_____
03/07/22	2755558	COURT – -San Diego Superior Court,Obtain copies of various oppositions related to Chicago Title litigation.	0.00	79.80	WO	HD	TR	_____
03/08/22	2757823	COURT – -San Diego Superior Court,Obtain copies of documents in Chicago Title litigation from Court docket.	0.00	18.40	WO	HD	TR	_____
03/08/22	2757824	COURT – -San Diego Superior Court,Obtain copy of Minute Order from December 2020 from Court docket.	0.00	1.00	WO	HD	TR	_____
03/08/22	2759124	RSRCH – Lexis	0.00	59.40	WO	HD	TR	_____
03/09/22	2757825	COURT – -San Diego Superior Court,Obtain copy of March 8, 2022 Minute Order from Court docket.	0.00	1.00	WO	HD	TR	_____
03/10/22	2758828	RSRCH – WestLaw	0.00	375.00	WO	HD	TR	_____

09/23/22 17:26:02 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				
03/15/22	2757833	COURT – -San,Obtain copies of documents from Court docket.	0.00	3.00	WO	HD	TR	_____
03/18/22	2758826	RSRCH – WestLaw	0.00	166.80	WO	HD	TR	_____
03/21/22	2758998	RSRCH – WestLaw	0.00	34.40	WO	HD	TR	_____
03/22/22	2757832	COURT – -San Diego Superior Court,Obtain copy of opposition papers from Court docket.	0.00	57.40	WO	HD	TR	_____
03/23/22	2757755	BW – Duplication - Black & White Copies	6.00	0.60	WO	HD	TR	_____
03/25/22	2763808	RSRCH – WestLaw	0.00	137.60	WO	HD	TR	_____
03/29/22	2758286	DEPO – Veritext, LLC - Deposition Transcript of Sasha Sutherland Taken on 03/24/2022	0.00	2,653.65	WO	HD	TR	_____
03/29/22	2759125	RSRCH – Lexis	0.00	79.20	WO	HD	TR	_____
03/29/22	2763167	MSNGR – Messenger - First Legal	0.00	18.75	WO	HD	TR	_____
03/29/22	2763168	FILING – Filing Fees - First Legal - eFILING; CLARK CO. RECORDER ; DEED OF TRUST	0.00	75.50	WO	HD	TR	_____
03/29/22	2763447	RSRCH – Lexis	0.00	79.20	WO	HD	TR	_____
04/01/22	2760569	EDISC – CS Disco, Inc. - Monthly Hosting for April 2022	0.00	2,343.03	WO	HD	TR	_____
04/03/22	2763810	RSRCH – WestLaw	0.00	620.20	WO	HD	TR	_____
04/03/22	2765613	COURT – -Mark Hartney,SD SUPERIOR CRT ROA-document retrieval	0.00	11.40	WO	HD	TR	_____
04/03/22	2765614	COURT – -Mark Hartney,SD SUPERIOR CRT ROA-document retrieval	0.00	13.00	WO	HD	TR	_____
04/04/22	2763811	RSRCH – WestLaw	0.00	104.20	WO	HD	TR	_____
04/04/22	2765615	COURT – -Mark Hartney,SD SUPERIOR CRT ROA-document	0.00	1.00	WO	HD	TR	_____

09/23/22 17:26:02 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				
04/05/22	2759666	retrieval STATU – One Legal - Filing Fees for Superior Court of California, San Diego County - Opposition to Noticed Motion and Supporting Declarations, Request for Judicial Notice, Declaration	0.00	22.50	WO	HD	TR	_____
04/05/22	2763812	RSRCH – WestLaw	0.00	30.60	WO	HD	TR	_____
04/07/22	2761245	DCSRCH – Document Search - - PACER - 1/22 - 3/22 Usage	0.00	31.40	WO	HD	TR	_____
04/07/22	2761246	DCSRCH – Document Search - - PACER - 1/22 - 3/22 Usage	0.00	0.60	WO	HD	TR	_____
04/07/22	2761247	DCSRCH – Document Search - - PACER - 1/22 - 3/22 Usage	0.00	7.70	WO	HD	TR	_____
04/07/22	2761248	DCSRCH – Document Search - - PACER - 1/22 - 3/22 Usage	0.00	7.00	WO	HD	TR	_____
04/07/22	2761333	DEPO – Veritext, LLC - Deposition Transcript of Gina Champion-Cain, Volume II Taken on 04/06/2022	0.00	3,138.15	WO	HD	TR	_____
04/12/22	2760212	MEDIT – Judicate West - Full Day Mediation on 04/13/2022	0.00	1,240.00	WO	HD	TR	_____
04/14/22	2763809	RSRCH – WestLaw	0.00	220.80	WO	HD	TR	_____
04/15/22	2761916	COURT – -San Diego Superior Court,Obtain copy of case file from Court docket.	0.00	50.00	WO	HD	TR	_____
04/20/22	2761557	BW – Duplication - Black & White Copies	23.00	2.30	WO	HD	TR	_____
04/20/22	2761918	COURT – -San Diego Superior Court,Obtain copy of Stipulation and Order from Court docket.	0.00	5.40	WO	HD	TR	_____
04/27/22	2765141	MSNGR – Federal Express - Ship To: Robert McArdle	0.00	22.34	WO	HD	TR	_____
04/27/22	2765147	MSNGR – Federal Express - Ship To: Eugene Shapiro	0.00	34.28	WO	HD	TR	_____
04/29/22	2766467	RECORD – First Legal Network, LLC - SAN DIEGO CO. RECORDER; DEED OF TRUST	0.00	208.00	WO	HD	TR	_____
04/29/22	2767466	MSNGR – Messenger - First Legal LLC - FIRST LEGAL	0.00	23.00	WO	HD	TR	_____

09/23/22 17:26:02 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					
05/01/22	2764502	COURT – -San Diego Superior Court,Obtain copy of April 28 Orders in litigation matters.	0.00	4.00	WO	HD	TR	_____	
05/01/22	2764505	COURT – -San Diego Superior Court,Obtain copy of April 28 Order from Court Docket	0.00	2.00	WO	HD	TR	_____	
05/01/22	2772971	EDISC – CS Disco, Inc. - Monthly Hosting for May 2022	0.00	2,343.03	WO	HD	TR	_____	
05/02/22	2766468	MSNGR – First Legal Network, LLC - SDSC-SAN DIEGO; Jointer in Ex Parte Application to Temporarily Stay	0.00	48.75	WO	HD	TR	_____	
05/03/22	2764504	COURT – -San Diego Superior Court,Obtain copy of Minute Order April 1 Minute Order from Court's Docket.	0.00	6.60	WO	HD	TR	_____	
05/04/22	2767914	RSRCH – WestLaw	0.00	43.00	WO	HD	TR	_____	
05/04/22	2770107	COURT – -Stephanie Hanks,SD SUPERIOR CRT ROA-Court document retrieval	0.00	2.00	WO	HD	TR	_____	
05/05/22	2764399	STATU – One Legal - Filing Fees for Superior Court of California, San Diego County - Joinder to Motion and Supporting Declarations, Proof of Service	0.00	457.50	WO	HD	TR	_____	
05/06/22	2766346	COURT – -San Diego Superior Court,Obtain copy of May 5, 2022 Minute Order in Chicago Title litigation Court's docket.	0.00	2.00	WO	HD	TR	_____	
05/11/22	2764961	STATU – One Legal - Filing Fees for Superior Court of California, San Diego County - Stipulation - Other - Fee Due, Proof of Service	0.00	42.50	WO	HD	TR	_____	
05/14/22	2766343	COURT – -San Diego Superior Court,Obtain copy of Order from Court's docket in Kim Funding matter.	0.00	2.00	WO	HD	TR	_____	
05/17/22	2765838	RECORD – Stewart Title Company - Recording fee for Sethee Deeds of Trust	0.00	1,134.00	WO	HD	TR	_____	
05/17/22	2767915	RSRCH – WestLaw	0.00	43.00	WO	HD	TR	_____	
05/20/22	2766371	BW – Duplication - Black & White Copies	285.00	28.50	WO	HD	TR	_____	
05/23/22	2767168	MSNGR – Federal Express - Ship To: Attn Amy Gutierrez - Stewart Title Company	0.00	40.20	WO	HD	TR	_____	
05/24/22	2766761	COLOR – Duplication - Color Copies	1.00	0.10	WO	HD	TR	_____	

09/23/22 17:26:02 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				
05/26/22	2772094	RSRCH – WestLaw	0.00	61.20	WO	HD	TR	_____
05/27/22	2772092	RSRCH – WestLaw	0.00	202.60	WO	HD	TR	_____
05/31/22	2772093	RSRCH – WestLaw	0.00	272.00	WO	HD	TR	_____
05/31/22	2773660	COURT – -Heather Riley,SD SUPERIOR CRT ROA-Fee to get copy of First Amended Complaint (Case No. 2020-00039790-CU-FR-CTL)	0.00	35.80	WO	HD	TR	_____
06/01/22	2768449	BW – Duplication - Black & White Copies	1,135.00	113.50	WO	HD	TR	_____
06/01/22	2772972	EDISC – CS Disco, Inc. - Monthly Hosting for June 2022	0.00	2,343.03	WO	HD	TR	_____
06/02/22	2768548	COLOR – Duplication - Color Copies	5.00	0.50	WO	HD	TR	_____
06/08/22	2770507	MSNGR – Federal Express - Ship To: c o E3 Realty Advisors, Inc - American National Investments,	0.00	16.30	WO	HD	TR	_____
06/10/22	2769293	BW – Duplication - Black & White Copies	109.00	10.90	WO	HD	TR	_____
06/14/22	2769421	BW – Duplication - Black & White Copies	27.00	2.70	WO	HD	TR	_____
06/16/22	2772095	RSRCH – WestLaw	0.00	153.00	WO	HD	TR	_____
06/16/22	2773665	COURT – -Heather Riley,SD SUPERIOR CRT ROA-Copies of motion papers from San Diego Superior Court	0.00	62.00	WO	HD	TR	_____
06/17/22	2769890	FILING – -USDC Southern District of California,Filing fee for 2Budz Holding clawback complaint	0.00	402.00	WO	HD	TR	_____
06/21/22	2771045	FILING – -USDC Southern District of California,Filing fee for Notice of Receivership in the USDC Southern District of California	0.00	49.00	WO	HD	TR	_____
06/21/22	2771046	FILING – -USDC Central District of California,Filing fee for Notice of Receivership in USDC Central District of California	0.00	49.00	WO	HD	TR	_____
06/21/22	2771047	FILING – -USDC Eastern District of California,Filing fee for	0.00	49.00	WO	HD	TR	_____

09/23/22 17:26:02 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				
06/22/22	2771048	Notice of Receivership in USDC Eastern District of California FILING – -USDC Northern District of California,Filing fee for Notice of Receivership in USDC Northern District of California	0.00	49.00	WO	HD	TR	_____
06/22/22	2772096	RSRCH – WestLaw	0.00	387.00	WO	HD	TR	_____
06/28/22	2775700	RSRCH – WestLaw	0.00	129.00	WO	HD	TR	_____
06/29/22	2773122	COURT – -San Diego Superior Court,Obtain copies of pleadings from Court docket.	0.00	68.60	WO	HD	TR	_____
06/29/22	2775701	RSRCH – WestLaw	0.00	129.00	WO	HD	TR	_____
06/30/22	2775702	RSRCH – WestLaw	0.00	153.00	WO	HD	TR	_____

Proforma Summary

Timekeeper

Number	Timekeeper	Hours	Rate	Amounts
000313	Zaro, David	1.30	837.00	1,088.10
001665	Fates, Edward (Ted)	10.80	643.50	6,949.80
002372	Kraus, Katherine	0.50	697.50	348.75
		12.60		\$8,386.65
Subtotal Fees				\$8,386.65
Discount				0.00
Total Fees				8,386.65
Total Disbursements				42,642.24

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 09/23/22

09/23/22 17:26:02 PROFORMA STATEMENT FOR MATTER 378827.00002 (Krista Freitag, as Receiver for ANI Deve) (SEC v. Champion-Cain - General Receivers)

	Fiscal YTD			Calendar YTD			LTD		
	Total	Fees	Disb.	Total	Fees	Disb.	Total	Fees	Disbursements
Worked	20,058.30	3,993.30	16,065.00	55,022.19	12,379.95	42,642.24	403,877.09	77,952.15	325,924.94
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	135,257.2	63,036.90	63,036.90	212,620.83
						3			
Collected	0.00	0.00	0.00	142,295.23	7,038.00	135,257.2	275,657.73	63,036.90	212,620.83
						3			
AR Write Off	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00
WIP	266,118.83	14,914.80	251,204.03						
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

09/21/22 17:46:34 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: 1180820

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	
01/06/22	8690433	Emails related to settlement of Hiscox claim and agreement (.3). Several emails/review Hiscox changes and email to Receiver, Hiscox settlement (.4).	Zaro, David	0.70	585.90	585.90	WO	HD	TR
01/07/22	8687292	Discuss approach to ANI data storage/preservation issues and costs with Receiver	Fates, Edward (Ted)	0.20	128.70	714.60	WO	HD	TR
01/07/22	8691439	Several emails with Hiscox counsel and Receiver, follow-up on settlement agreement.	Zaro, David	0.30	251.10	965.70	WO	HD	TR
01/10/22	8691506	Several emails with the Receiver and Hiscox counsel as to the final settlement agreement/related documents.	Zaro, David	0.40	334.80	1,300.50	WO	HD	TR
01/14/22	8696047	Emails/call regarding Hiscox payment and follow-up.	Zaro, David	0.30	251.10	1,551.60	WO	HD	TR
02/15/22	8727862	Discuss issues relating to ANI interest in Casa del Zorro hotel with Receiver (.4)	Fates, Edward (Ted)	0.40	257.40	1,809.00	WO	HD	TR

09/21/22 17:46:34 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	
02/22/22	8734048	Communications with G. Rodriguez regarding ANI investment in Menon Renewable and recovery on same (.4) call with counsel for Menon Renewable re: same (.3)	Fates, Edward (Ted)	0.70	450.45	2,259.45	WO	HD	TR
02/24/22	8736577	Communications with counsel for Menon Renewable re: production of documents and confidentiality agreement (.4) discuss document production / ANI repository issues with Receiver (.5) analyze issues re: same (.4) communications re: same with CTC counsel (.2)	Fates, Edward (Ted)	1.50	965.25	3,224.70	WO	HD	TR
03/08/22	8752073	Analyze proposed confidentiality agreement from Menon Renewables, discuss same with G. Rodriguez	Fates, Edward (Ted)	0.40	257.40	3,482.10	WO	HD	TR
03/10/22	8754636	Communications with G. Rodriguez and counsel for Menon Renewables re: confidentiality agreement	Fates, Edward (Ted)	0.30	193.05	3,675.15	WO	HD	TR
03/24/22	8774448	Analysis and determination of document productions in preparation for attorney review.	Peng, Simona	0.50	157.50	3,832.65	WO	HD	TR
03/25/22	8770443	Analysis and determination of deposition materials in preparation for attorney review.	Peng, Simona	2.00	630.00	4,462.65	WO	HD	TR
03/27/22	8771688	Review and respond to emails and search for Parks & Solar documents.	Kaup, John	0.30	94.50	4,557.15	WO	HD	TR
03/28/22	8773391	Review and respond to emails and follow up on Parks & Solar production.	Kaup, John	0.20	63.00	4,620.15	WO	HD	TR

09/21/22 17:46:34 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	
03/28/22	8775607	Analysis and determination of deposition materials in preparation for attorney review.	Peng, Simona	0.50	157.50	4,777.65	WO	HD	TR
06/22/22	8869851	Analyze and advise Receiver concerning data collection / forensic computer work and associated costs	Fates, Edward (Ted)	0.80	514.80	5,292.45	WO	HD	TR

Proforma Summary

Timekeeper

Number	Timekeeper	Hours	Rate	Amounts
000313	Zaro, David	1.70	837.00	1,422.90
000820	Kaup, John	0.50	315.00	157.50
001665	Fates, Edward (Ted)	4.30	643.50	2,767.05
002307	Peng, Simona	3.00	315.00	945.00
		9.50		\$5,292.45
Subtotal Fees				\$5,292.45
Discount				0.00
Total Fees				5,292.45
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 09/21/22

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

09/21/22 17:46:34 PROFORMA STATEMENT FOR MATTER 378827.00003 (Krista Freitag, as Receiver for ANI Deve) (SEC v. Champion-Cain - Asset Investigati)

Worked	6,640.65	6,640.65	0.00	11,933.10	11,933.10	0.00	431,777.05	422,648.55	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

	Total	Fees	Costs
WIP	57,738.60	57,738.60	0.00
Balance			
AR Balance	0.00	0.00	0.00
Unalloc	0.00		
Payment			
Client Trust	0.00		
Balance			

Billing Address

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

09/21/22 17:46:35 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: 1180820
 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	
02/16/22	8729291	Revisions to Receiver's 10th interim report and exhibit thereto (1.4) discuss same with Receiver (.3) meet and confer communications with SEC counsel (.1)	Fates, Edward (Ted)	1.80	1,158.30	1,158.30	WO	HD	TR
02/16/22	8733963	Several emails, then revise draft report, address certain insurance issues, follow-up regarding same.	Zaro, David	0.60	502.20	1,660.50	WO	HD	TR
02/24/22	8736610	Discuss revisions/updates to 10th interim report with Receiver (.3) finalize same (.3)	Fates, Edward (Ted)	0.60	386.10	2,046.60	WO	HD	TR
06/03/22	8867561	Work on Receiver's 11th interim report (1.7) discuss same with Receiver (.6)	Fates, Edward (Ted)	2.30	1,480.05	3,526.65	WO	HD	TR
06/06/22	8857927	Communications with Receiver regarding revisions to 11th interim report (.3) meet and confer communications with SEC counsel (.2)	Fates, Edward (Ted)	0.50	321.75	3,848.40	WO	HD	TR
06/13/22	8868709	Meet and confer communications with SEC counsel (.2) revisions and updates to 11th interim report (.3) discuss same with Receiver (.2)	Fates, Edward (Ted)	0.70	450.45	4,298.85	WO	HD	TR

09/21/22 17:46:35 PROFORMA STATEMENT FOR MATTER 378827.00004 (Krista Freitag, as Receiver for ANI Deve) (SEC v. Champion-Cain - Reporting)

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

Trans Date	Index	Description of Service Rendered	Timekeeper	Hours	Fees	Sum	Circle Action
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Proforma Summary**Timekeeper**

Number	Timekeeper	Hours	Rate	Amounts
000313	Zaro, David	0.60	837.00	502.20
001665	Fates, Edward (Ted)	5.90	643.50	3,796.65
		6.50		\$4,298.85
Subtotal Fees				\$4,298.85
Discount				0.00
Total Fees				4,298.85
Total Disbursements				0.00

Attorney Billing Instructions

<input type="checkbox"/> BILL ALL	<input type="checkbox"/> Hold
<input type="checkbox"/> BILL FEES ONLY	<input type="checkbox"/> Write Off
<input type="checkbox"/> BILL COST ONLY	<input type="checkbox"/> 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 09/21/22

	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						

09/21/22 17:46:35 PROFORMA STATEMENT FOR MATTER 378827.00004 (Krista Freitag, as Receiver for ANI Deve) (SEC v. Champion-Cain - Reporting)

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

09/21/22 17:46:37 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: 1180820
 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		
01/03/22	8679606	Initial analysis of claims asserted by Kim Funding and ABC Funding, discuss same with Receiver (.6) discuss Duerr, Lansche and CalPrivate claim issues with Receiver (.8) communications with counsel for Lansche trustee re: Lansche claim issues (.3)	Fates, Edward (Ted)	1.70	1,093.95	1,093.95	WO	HD	TR	_____
01/03/22	8685588	Evaluate the Peterson Proof of Claim, assess issues, impact upon the claim and follow-up with counsel (.7). Further review/analysis of the supporting documents related to the Peterson Claim including investor contracts and related documents (.4).	Zaro, David	1.10	920.70	2,014.65	WO	HD	TR	_____
01/04/22	8684314	Follow up with counsel for investor re: claim calculation discrepancy (.2) communications with Receiver re: estate issues with claim of deceased claimant (.3)	Fates, Edward (Ted)	0.50	321.75	2,336.40	WO	HD	TR	_____
01/05/22	8685421	Advise Receiver on unique claim issues for investor claim calculations and analysis	Fates, Edward (Ted)	1.10	707.85	3,044.25	WO	HD	TR	_____

09/21/22 17:46:37 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 relating to deceased investors, IRA/Trust allocations, and transactions involving K. Peterson	Timekeeper	Hours	Fees	Sum	Circle Action			
01/06/22	8686306	Call with counsel for CalPrivate Bank re: claimed security interest in receivership funds and related issues (.4) discuss same and claim dispute issues with Receiver (.5)	Fates, Edward (Ted)	0.90	579.15	3,623.40	WO	HD	TR	_____
01/06/22	8690427	Several emails, assess the approach to the Cal Private Bank claim issues/dispute.	Zaro, David	0.30	251.10	3,874.50	WO	HD	TR	_____
01/07/22	8687288	Discuss disputed claim issues with Receiver (.3) communications with counsel for investors re: missing claims and submission of late claims (.7) communications from investors re: claims process (.2)	Fates, Edward (Ted)	1.20	772.20	4,646.70	WO	HD	TR	_____
01/10/22	8688306	Communications with Receiver and counsel for investors re: claims submitted and submission of late claim (.6) advise on issues re: CalPrivate claim of security interest (.3) discuss HAV claim issue with Receiver (.2)	Fates, Edward (Ted)	1.10	707.85	5,354.55	WO	HD	TR	_____
01/10/22	8691502	Research/analysis of the prior filings by Cal Private Bank as their claim and assess response (1.6). Conference with counsel related to disputed/unresolved claims, HAV, other disputed claims, process for addressing other claims issues via summary procedures (.6).	Zaro, David	2.20	1,841.40	7,195.95	WO	HD	TR	_____
01/11/22	8690102	Discuss analysis of certain investor claims with Receiver	Fates, Edward (Ted)	0.40	257.40	7,453.35	WO	HD	TR	_____

09/21/22 17:46:37 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			
01/12/22	8691375	Communications with Receiver and counsel for investors re: losing investors who did not submit claims (.6) communications with Receiver and counsel for CTC re: missing records relating to investor transactions (.3)	Fates, Edward (Ted)	0.90	579.15	8,032.50	WO	HD	TR	_____
01/19/22	8697294	Analyze and advise Receiver on ANI former employee claim issue	Fates, Edward (Ted)	0.30	193.05	8,225.55	WO	HD	TR	_____
01/21/22	8700046	Discuss unique claim dispute issues with Receiver (.3) communications with investor claimant re: same (.1)	Fates, Edward (Ted)	0.40	257.40	8,482.95	WO	HD	TR	_____
01/27/22	8705940	Dispute unique claim dispute issues and communications re: same with Receiver	Fates, Edward (Ted)	0.70	450.45	8,933.40	WO	HD	TR	_____
01/28/22	8707839	Communications with counsel for R. Mitchell re: Lansche probate court proceedings and claim for investment loss in receivership	Fates, Edward (Ted)	0.30	193.05	9,126.45	WO	HD	TR	_____
02/08/22	8721360	Discuss unique investor claim issue re: CTC settlement payment with Receiver (.6) communications with counsel for investor re: same (.3) communications with counsel for CTC re: same (.2) discuss investor loss calculation issues with Receiver (.3) analyze communications from counsel for CalPrivate Bank re: claim in receivership (.2) discuss same with Receiver (.2)	Fates, Edward (Ted)	1.80	1,158.30	10,284.75	WO	HD	TR	_____
02/08/22	8723106	Analysis of the CalBank lender participation agreement and address claims standing, email advice to Receiver.	Zaro, David	0.70	585.90	10,870.65	WO	HD	TR	_____

09/21/22 17:46:37 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		
02/09/22	8722487	Analyze various issues with disputed investor claims, discuss same with Receiver (1.1) communications with counsel for investors re: same (.5)	Fates, Edward (Ted)	1.60	1,029.60	11,900.25	WO	HD	TR	_____
02/09/22	8724252	Research/analysis of the CalPrivate Bank, participation agreement and CalPrivate Bank's claim of a security interest.	Zaro, David	1.10	920.70	12,820.95	WO	HD	TR	_____
02/10/22	8724260	Advise Receiver re: unique claim disputes and responses to same	Fates, Edward (Ted)	0.40	257.40	13,078.35	WO	HD	TR	_____
02/10/22	8726975	Research related to claims objections and notices, bar date, analysis of the possible CTC indemnity claim and related issues, follow-up call with counsel.	Zaro, David	0.90	753.30	13,831.65	WO	HD	TR	_____
02/11/22	8725144	Advise Receiver re: analysis and response to claims from former ANI employees (.5) advise Receiver and L. Ryan re: responses to disputed trade creditor claims (.6) analyze issues relating to CTC settlements with investors and prospective joint motions relating to same (.8) discuss same with Receiver (.3) respond to request for signed claim forms from counsel for investors (.2) respond to counsel for CTC re: claim amounts of settling investors (.4)	Fates, Edward (Ted)	2.80	1,801.80	15,633.45	WO	HD	TR	_____
02/14/22	8726762	Analyze issues re: investor settlements with CTC and joint motion relating to investor claims in receivership and related issues (.7) call with counsel for CTC regarding investor settlements and related issues (.8) discuss same with Receiver (.6)	Fates, Edward (Ted)	2.10	1,351.35	16,984.80	WO	HD	TR	_____

09/21/22 17:46:37 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		
02/14/22	8729965	Evaluate CTC email and settlements of the third party lawsuits, proposed joint motion related to settlements (.8). Follow-up emails with Receiver counsel, call to address strategy (.4).	Zaro, David	1.20	1,004.40	17,989.20	WO	HD	TR	_____
02/14/22	8968133	Evaluate the Ovation settlement/joint motion and terms, assess indemnity and claims issues, follow-up regarding same (.5).	Zaro, David	0.50	418.50	18,407.70	WO	HD	TR	_____
02/15/22	8727865	Discuss issues relating to CTC settlements, investor claims, and Kim Peterson with Receiver (.3) communications with counsel for Ovation re: same (.3) communications with counsel for probate representative of deceased investor claimant (.6)	Fates, Edward (Ted)	1.20	772.20	19,179.90	WO	HD	TR	_____
02/16/22	8729579	Call/emails with counsel for Ovation relating to joint motion with CTC regarding Ovation settlement with CTC (.6) call with counsel for CTC re: issues relating to investor settlements with CTC and joint motions re: receivership claims relating thereto (.4) advise Receiver re: same (.4)	Fates, Edward (Ted)	1.40	900.90	20,080.80	WO	HD	TR	_____
02/17/22	8730798	Call/emails with counsel for Ovation re: CTC settlement, joint motion related to same, and related issues (.6) assist Receiver in responding to investor inquiries concerning claims and CTC settlements (.3) analyze CTC good faith settlement motions for CTC/Ovation and CTC/Allred settlements (.9) communications with counsel for CTC re: joint motion (.3) advise Receiver re: same (.4) communications with	Fates, Edward (Ted)	4.20	2,702.70	22,783.50	WO	HD	TR	_____

09/21/22 17:46:37 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	
		counsel for K. Peterson re: Allred settlement and joint motion re: same (.6) advise Receiver re: same and investor claim issues (.5) analyze and revise joint motion from CTC re: Ovation and Yu settlements (.4) discuss same with Receiver (.2)							
02/18/22	8733019	Call with counsel for Ovation re CTC joint motion for Ovation settlement and related issues	Fates, Edward (Ted)	0.50	321.75	23,105.25	WO	HD	TR _____
02/18/22	8734045	Emails related to good faith settlement motion,I follow-up on the joint motion related to settlement and analysis.	Zaro, David	0.80	669.60	23,774.85	WO	HD	TR _____
02/22/22	8733954	Revisions to draft joint motion relating to investor settlements with CTC and claims against receivership estate (.4) discuss same with Receiver (.2) communications with counsel for CTC re: same (.7) review investor settlement agreements for purposes of joint motion (.8)	Fates, Edward (Ted)	2.10	1,351.35	25,126.20	WO	HD	TR _____
02/22/22	8968182	Evaluate the drafts of the CTC settlement/joint motion and revise joint motion, follow-up (.6).	Zaro, David	0.60	502.20	25,628.40	WO	HD	TR _____
02/23/22	8735286	Calls/emails with counsel for CTC re: various investor settlements for joint motions relating to claims against receivership (1.4) discuss same with Receiver (.7) communications with counsel for Ovation re: same (.1) advise Receiver re: unique issues re: deceased investor and probate estate (.3) communications with	Fates, Edward (Ted)	2.60	1,673.10	27,301.50	WO	HD	TR _____

09/21/22 17:46:37 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	
		counsel for probate representative re: same (.1)							
02/24/22	8736809	Advise Receiver re: unique claim allowance/dispute issues (.5) communications with counsel for CTC re: joint motion for investor settlements and claims against receivership (.5) discuss same with Receiver (.3)	Fates, Edward (Ted)	1.30	836.55	28,138.05	WO	HD	TR
02/24/22	8743906	Evaluate email related to Peterson, the third party cases and settlements, the so-called good faith settlement motion and follow-up with counsel (.8). Email/call with counsel related to joint settlement motion, the Peterson/ABC investor settlement, follow-up (.6).	Zaro, David	1.40	1,171.80	29,309.85	WO	HD	TR
02/25/22	8738159	Advise Receiver on issues with deceased investor claim and probate proceeding and splitting of claim between divorced investors (.4) communications with Receiver and counsel for investors re: late/missing claim forms (.5) communications with counsel for CalPrivate re: claim in receivership and related issues (.3)	Fates, Edward (Ted)	1.20	772.20	30,082.05	WO	HD	TR
02/25/22	8744193	Several emails and follow-up with counsel regarding Cal Private Bank claim.	Zaro, David	0.20	167.40	30,249.45	WO	HD	TR
02/28/22	8740011	Communications with counsel for executor of deceased investor's estate re: claim issues	Fates, Edward (Ted)	0.30	193.05	30,442.50	WO	HD	TR
03/01/22	8747048	Discuss Second Source Solutions claim issues with Receiver (.2) call with counsel	Fates, Edward (Ted)	1.40	900.90	31,343.40	WO	HD	TR

09/21/22 17:46:37 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			
		for Second Sources Solutions re: same (.2) call with counsel for CalPrivate Bank re: claim against receivership estate, K. Peterson issues and related issues (.8) discuss same with Receiver (.2)								
03/01/22	8748093	Evaluate the CalPrivate Bank claim issues, legal issues related to security interest (.4). Call with CalPrivate Bank counsel related to claim (.2).	Zaro, David	0.60	502.20	31,845.60	WO	HD	TR	_____
03/02/22	8746904	Analyze issues and advise on CalPrivate Bank claims against receivership, claims against K. Peterson trust, and potential resolution of same (.4) discuss same with Receiver (.3) communications with counsel for CalPrivate Bank (.1) discuss Estate of T. Lansche claim issues with Receiver (.2) communications with counsel for executor of Estate of T. Lansche (.1) communications with Receiver and counsel for CTC re: issue with Vargas claim (.2)	Fates, Edward (Ted)	1.30	836.55	32,682.15	WO	HD	TR	_____
03/02/22	8749011	Analysis/review of strategy regarding CalPrivate Bank claim, offer related to settlement of dispute over alleged secured claim (.7). Conference with counsel related to CalPrivate Bank strategy/settlement (.4).	Zaro, David	1.10	920.70	33,602.85	WO	HD	TR	_____
03/03/22	8748030	Advise Receiver on community property issues relating to investor claims (.2) communications with counsel for CalPrivate Bank re: claim against receivership estate (.4)	Fates, Edward (Ted)	0.60	386.10	33,988.95	WO	HD	TR	_____

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03/03/22	8750868	Research the legal issues as to CalPrivate Bank and several issues related to conference with Cal Private Bank, and claimants as to possible settlement approach (.6). Work with Receiver counsel, advice related to the settlement options with CalPrivate as to the investor claims and settlement (.5).	Zaro, David	1.10	920.70	34,909.65	WO	HD	TR	_____
03/04/22	8752158	Call with counsel related to disputed claims, Cal Private Bank claims and work on possible settlement offer (.4). Follow-up with counsel related to claims of Cal Private Bank, Chicago Title Company and Bank of California (.3).	Zaro, David	0.70	585.90	35,495.55	WO	HD	TR	_____
03/07/22	8752079	Communications with counsel for CalPrivate Bank re: claim in receivership and related issues (.6) advise Receiver re: same (.2) communications with counsel for CTC re: investor settlements and claims in receivership (.3)	Fates, Edward (Ted)	1.10	707.85	36,203.40	WO	HD	TR	_____
03/07/22	8752166	Evaluate several emails to Bank of California settlement, conference with counsel related to impact on receivership/claims.	Zaro, David	0.70	585.90	36,789.30	WO	HD	TR	_____
03/08/22	8751845	Communications with counsel for CalPrivate Bank re: claim issues	Fates, Edward (Ted)	0.30	193.05	36,982.35	WO	HD	TR	_____
03/08/22	8753435	Evaluate cases related to claimant lender claims, security interest in escrow funds and research the rights of secured creditors.	Zaro, David	0.60	502.20	37,484.55	WO	HD	TR	_____

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03/11/22	8755755	Discuss pending investor settlements and claims analysis issues with Receiver	Fates, Edward (Ted)	0.40	257.40	37,741.95	WO	HD	TR	_____
03/14/22	8757169	Communications with counsel for CalPrivate Bank re: claim issues	Fates, Edward (Ted)	0.30	193.05	37,935.00	WO	HD	TR	_____
03/14/22	8968164	Evaluate the third party settlements by investors with Chicago title, assess impact on receivership/claims (.4).	Zaro, David	0.40	334.80	38,269.80	WO	HD	TR	_____
03/18/22	8767454	Analysis of the outstanding settlements as to the investor actions, CaLPrivate Bank case and call with counsel.	Zaro, David	0.40	334.80	38,604.60	WO	HD	TR	_____
03/21/22	8764876	Communications with counsel for K. Peterson re: objection to Allred settlement	Fates, Edward (Ted)	0.20	128.70	38,733.30	WO	HD	TR	_____
03/21/22	8767613	Emails with Receiver related to the claims issues and CalPrivate claim.	Zaro, David	0.20	167.40	38,900.70	WO	HD	TR	_____
03/22/22	8765793	Analyze K. Peterson opposition to CTC good faith settlement motion for Allred settlement (.6) analyze issues relating to 2Budz Holdings claim in receivership (.5)	Fates, Edward (Ted)	1.10	707.85	39,608.55	WO	HD	TR	_____
03/23/22	8767474	Review investor claims information from counsel for CTC and discuss same with Receiver (.3) analyze issues re: 2Budz Holding claim and dispute related thereto (.4) discuss same with Receiver (.2) call with counsel for 2Budz re: same (.5) prepare letter to counsel for 2Budz re: claim dispute (.4) advise Receiver re: trade creditor claim issues (.6)	Fates, Edward (Ted)	2.40	1,544.40	41,152.95	WO	HD	TR	_____

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03/24/22	8768597	Advise Receiver on investor and trade creditor claim disputes, notice of same, and related issues (1.6) prepare notice of claim dispute to former employee P. Luu (.5) analyze trade creditor claims of Rodman Law Group and Wells Fargo (.6) analyze CTC reply to K. Peterson opposition to Allred settlement motion and treatment of investor claims (.4) assist in preparing notice of dispute to claimant J. Graf (.3) prepare notice of dispute regarding Noonan Lance claim (.4)	Fates, Edward (Ted)	3.80	2,445.30	43,598.25	WO	HD	TR	_____
03/25/22	8769633	Advise Receiver on investor claim issues (.3) prepare notice of claim dispute to The Rodman Law Group (.4)	Fates, Edward (Ted)	0.70	450.45	44,048.70	WO	HD	TR	_____
03/25/22	8777216	Research/analysis of the claims issues, CalPrivate and follow-up with counsel as to fact and legal issues.	Zaro, David	1.10	920.70	44,969.40	WO	HD	TR	_____
03/28/22	8777374	Research/analysis of the disputed claims and assess impact of security interests (1.3). Call/email related to the CalPrivate Bank issues, follow-up (.4). Several calls/email related to the California Bank claim/CTC assignment of bank claim (.2).	Zaro, David	1.90	1,590.30	46,559.70	WO	HD	TR	_____
03/29/22	8777385	Evaluate the issues related to CalPrivate claims, draft/revise letter to Bank counsel regarding claim dispute, follow-up with the Receiver.	Zaro, David	2.40	2,008.80	48,568.50	WO	HD	TR	_____
03/30/22	8775523	Discuss investor claim disputes and notices re: same with Receiver	Fates, Edward (Ted)	0.30	193.05	48,761.55	WO	HD	TR	_____

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03/30/22	8777411	Several emails and finalize letter to CalPrivate Bank, including additional revisions (.9). Call with counsel as to UCC financing research (.4).	Zaro, David	1.10	920.70	49,682.25	WO	HD	TR	_____
03/31/22	8782279	Follow-up with counsel related to the disputed claim of CalPrivate Bank as to additional support regarding legal issues regarding UCC.	Zaro, David	0.20	167.40	49,849.65	WO	HD	TR	_____
04/01/22	8783454	Review media article regarding approval of CTC settlements and investor claims against receivership estate	Fates, Edward (Ted)	0.20	128.70	49,978.35	WO	HD	TR	_____
04/04/22	8783769	Discuss adjustments to investor claims due to CTC settlements and notices re: same with Receiver (.4) analyze investor settlements with CTC and proposed joint motion relating to treatment of investor claims in receivership (.7)	Fates, Edward (Ted)	1.10	707.85	50,686.20	WO	HD	TR	_____
04/05/22	8784677	Communications with Receiver and counsel for P. Stevens re: claim amount information (.4) discuss investor settlements with CTC and proposed joint motion re: same with Receiver (.3) discuss notices to investors re: status of claims process, adjustments to claim amounts based on CTC settlements, and related updates with Receiver (.4) advise Receiver on unique claim calculation issues (.3) communications with counsel for CTC re: investor settlement payment amounts (.3)	Fates, Edward (Ted)	1.70	1,093.95	51,780.15	WO	HD	TR	_____
04/07/22	8786629	Call with investor re: specific questions concerning aggregation of multiple	Fates, Edward (Ted)	0.90	579.15	52,359.30	WO	HD	TR	_____

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		investments for purpose of calculating claim amount and potential tax issues, discuss same with Receiver (.5) call with counsel for J. Cohen re: issues relating to Allred settlement and investor claims (.4)							
04/08/22	8787854	Analyze orders approving joint motions re: Ovation, Allred and other investor settlements and claims in receivership, advise Receiver re: same	Fates, Edward (Ted)	0.40	257.40	52,616.70	WO	HD	TR _____
04/13/22	8792129	Analyze letter from counsel for CalPrivate Bank re: dispute as to claim and security interest	Fates, Edward (Ted)	0.40	257.40	52,874.10	WO	HD	TR _____
04/13/22	8793305	Evaluate the letter from CalPrivate Bank related to their claim, follow-up as to next steps.	Zaro, David	0.40	334.80	53,208.90	WO	HD	TR _____
04/14/22	8797499	Email/letter from CalPrivate Bank, alleged security interest and follow-up.	Zaro, David	0.40	334.80	53,543.70	WO	HD	TR _____
04/15/22	8794105	Discuss notices to investors re: revised claim amounts and prior recovery rates due to CTC settlement payments	Fates, Edward (Ted)	0.40	257.40	53,801.10	WO	HD	TR _____
04/18/22	8795593	Work on draft notices to investors re: changes to claim amounts and recovery rates due to CTC settlement payments (.4) discuss same with Receiver (.3)	Fates, Edward (Ted)	0.70	450.45	54,251.55	WO	HD	TR _____
04/20/22	8798499	Advise Receiver on revisions to investor claims notices re: status of claims process and adjustments to claims due to CTC settlement payments (.6) communications with Rodman Law Group re: dispute claim	Fates, Edward (Ted)	0.90	579.15	54,830.70	WO	HD	TR _____

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04/21/22	8799621	Communications with counsel for Rodman Law Group re: disputed creditor claim and resolution of same (.5) advise Receiver re: same (.2) discuss claim adjustments and notices re: same with Receiver (.3) communications with counsel for Ovation re: status of claim after CTC settlement payment (.3) communications with counsel for Banc of California and counsel for CTC re: status of claim after CTC settlement payment (.3) discuss issues re: potential CTC settlement and investor claims with SEC counsel (.4)	Fates, Edward (Ted)	2.00	1,287.00	56,117.70	WO	HD	TR _____
04/27/22	8806372	Advise on issues relating to CalPrivate disputed claim of security interest	Fates, Edward (Ted)	0.40	257.40	56,375.10	WO	HD	TR _____
04/27/22	8810812	Research/analysis of the CalPrivate response letter, and case law as to alleged secured claim, call with counsel to address strategy.	Zaro, David	0.80	669.60	57,044.70	WO	HD	TR _____
04/29/22	8810051	Analyze issues relating to CalPrivate security interest claim, claim against Peterson Trust and potential settlement of same and CTC issues (1.6) discuss same with Receiver (.3)	Fates, Edward (Ted)	1.90	1,222.65	58,267.35	WO	HD	TR _____
05/02/22	8815403	Review request to dismiss class claims in Allred state court action (.2) discuss investor claim issues with Receiver (.2) discuss issues re: potential settlement of CalPrivate claim with Receiver (.2) communications with counsel for CTC re:	Fates, Edward (Ted)	1.20	772.20	59,039.55	WO	HD	TR _____

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		issues relating to plaintiff investor claims (.3) respond to inquiry from investor re: claims process and distributions (.3)							
05/03/22	8816397	Discuss issues relating to motion to approve claim amounts and distribution plan with Receiver (.3) advise regarding responses to investor inquiries regarding distribution process (.3)	Fates, Edward (Ted)	0.60	386.10	59,425.65	WO	HD	TR
05/04/22	8818060	Advise Receiver on investor claim issues relating to I. Awerbuch	Fates, Edward (Ted)	0.20	128.70	59,554.35	WO	HD	TR
05/05/22	8818797	Discuss claims allowance and distribution plan issues with Receiver	Fates, Edward (Ted)	0.40	257.40	59,811.75	WO	HD	TR
05/05/22	8819892	Research/analysis of the anticipated claims disputes, rising tide analysis, the CalPrivate alleged secured claim, follow-up.	Zaro, David	1.20	1,004.40	60,816.15	WO	HD	TR
05/06/22	8819634	Advise Receiver on various unique investor claim issues and handling of trade creditor claims (1.3) communications with counsel for investor group re: Merit settlement payments and adjustments to claim amounts (.2)	Fates, Edward (Ted)	1.50	965.25	61,781.40	WO	HD	TR
05/06/22	8822767	Further research as to claims disputes and summary procedures to adjudicate the disputed claim.	Zaro, David	0.60	502.20	62,283.60	WO	HD	TR
05/09/22	8821827	Advise on issues relating to CalPrivate disputed claim of security interest	Fates, Edward (Ted)	0.30	193.05	62,476.65	WO	HD	TR
05/09/22	8822806	Research/analysis of the legal issues related to claim, disputes, due process,	Zaro, David	1.20	1,004.40	63,481.05	WO	HD	TR

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		summary proceedings and follow-up (.8). Work with counsel, email/call in order to address the disputed claims, follow-up as it related to settlement motion and claims bar (.4).							
05/10/22	8822567	Communications with Receiver and counsel for investors regarding Merit Settlement and adjustments to claims (.4) analyze and advise on issues relating to CalPrivate claim of security interest (.3)	Fates, Edward (Ted)	0.70	450.45	63,931.50	WO	HD	TR
05/10/22	8823160	Teleconference with D. Zaro regarding California Private Bank claim against receivership estate and provide legal analysis in connection with Receiver's anticipated response to same (0.5).	Del Castillo, Joshua	0.50	321.75	64,253.25	WO	HD	TR
05/10/22	8823938	Further analysis and research, work on the issues related to the disputed claims (.9). Calls with counsel as to the analysis of the disputed claims/subordination and motion (.5).	Zaro, David	1.40	1,171.80	65,425.05	WO	HD	TR
05/11/22	8824397	Follow-up analysis regarding treatment of putative secured creditor claim against proceeds of receivership sales (0.6).	Del Castillo, Joshua	0.60	386.10	65,811.15	WO	HD	TR
05/12/22	8825524	Initial analysis and revisions to draft motion re: allowed claims, disputed claims and distribution plan	Fates, Edward (Ted)	1.10	707.85	66,519.00	WO	HD	TR
05/13/22	8825920	Continued work on analysis and revisions to motion to allow claims, resolve disputed claims, and approve distribution plan (1.1) discuss same with Receiver (.3) analyze	Fates, Edward (Ted)	2.30	1,480.05	67,999.05	WO	HD	TR

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		CalPrivate request to appear at 5/23 status conference and statement relating to claim of security interest (.5) discuss same with Receiver (.3)							
05/16/22	8827689	Work on opposition to CalPrivate ex parte app to appear on 5/23 to argue claim issues and bar order issue (.9) discuss same with Receiver (.3) discuss same and scheduling issues with counsel for CTC (.3) call with counsel for J. Cohen re: settlement payments to investors and adjustments to claims re: same (.4) advise Receiver on unique claim issues (.4) analyze CTC opposition to CalPrivate ex parte application (.2)	Fates, Edward (Ted)	2.50	1,608.75	69,607.80	WO	HD	TR
05/16/22	8832323	Research/analysis and revise draft of claims objection (1.1). Continue working on draft of the objection to the claims (.9). Emails/call with counsel related to claims motion/objections (.8).	Zaro, David	2.80	2,343.60	71,951.40	WO	HD	TR
05/17/22	8829803	Advise Receiver on trade creditor claim issue	Fates, Edward (Ted)	0.20	128.70	72,080.10	WO	HD	TR
05/17/22	8832350	Work on further revisions to brief as to claims motion and CalPrivate claim (.9). Call/emails related to claims motion/disputed claims (.4).	Zaro, David	1.30	1,088.10	73,168.20	WO	HD	TR
05/18/22	8830731	Discuss issues relating to claims approval motion, trade creditor claims, and distributions with Receiver (.9) call with clerk re: scheduling of claims approval motion (.1) analyze issues re: netting of	Fates, Edward (Ted)	1.40	900.90	74,069.10	WO	HD	TR

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		transfers for disputed 2Budz claim (.4)							
05/18/22	8833794	Work on the motion to allow and disallow claims, analysis of the pending claimants actions and positions, revise the draft (1.6) Email with counsel/Receiver related to the claims motion/CalPrivate (.5).	Zaro, David	2.10	1,757.70	75,826.80	WO	HD	TR
05/19/22	8832187	Revisions to claims allowance and distribution plan motion (.6) discuss same with Receiver (.4) call with SEC counsel relating to proposed treatment of claims (.3) analyze order relating to claims allowance and distribution plan motion (.2) analyze issues/arguments relating to dispute CalPrivate Bank claim of security interest (.4) initial work on plan for providing notice per Court order (.4) analyze information from Receiver relating to disputed 2Budz claim (.4)	Fates, Edward (Ted)	2.70	1,737.45	77,564.25	WO	HD	TR
05/20/22	8834088	Discuss revisions to claims allowance motion with Receiver	Fates, Edward (Ted)	0.40	257.40	77,821.65	WO	HD	TR
05/20/22	8836328	Analysis of issues related to treatment of non-investor claims, subordination issues and follow-up with counsel, advice as to plan.	Zaro, David	0.70	585.90	78,407.55	WO	HD	TR
05/23/22	8835644	Communications with counsel for J. Cohen re: settlement payments to investors and adjustments to claim amounts (.2) analyze issues for notice plan relating to claims allowance motion (.6)	Fates, Edward (Ted)	0.80	514.80	78,922.35	WO	HD	TR

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05/24/22	8837206	Work on notice plan for claims allowance motion and proposed form of notice	Fates, Edward (Ted)	1.80	1,158.30	80,080.65	WO	HD	TR	_____
05/25/22	8839135	Call with Receiver to discuss draft notice plan and interim distribution issues for claims allowance motion (.4) work on revisions to notice plan and form of notice (.5)	Fates, Edward (Ted)	0.90	579.15	80,659.80	WO	HD	TR	_____
05/26/22	8840646	Work on claims allowance and plan motion (6.4) discuss same and exhibits to motion with Receiver (1.8)	Fates, Edward (Ted)	8.20	5,276.70	85,936.50	WO	HD	TR	_____
05/26/22	8847749	Emails communications with counsel for claimants, receiver and plaintiff counsel as to the combined Plans for claim/distribution motion and CTC settlement.	Zaro, David	0.80	669.60	86,606.10	WO	HD	TR	_____
05/27/22	8842640	Work on proposed Distribution Plan (3.7) work on sections of claims motion related to specific disputed claims (1.6) call from investor with inquiry concerning claims process and timing (.3) work on Receiver declaration in support of claims motion (1.6) revisions to narrative explanation of rising tide distribution method (.7) work on ex parte application to exceed page limit for claims motion and proposed order (.7)	Fates, Edward (Ted)	8.60	5,534.10	92,140.20	WO	HD	TR	_____
05/27/22	8846297	Confer with Ted Fates regarding research into MIMO issue	Pham, Matt D.	0.10	41.40	92,181.60	WO	HD	TR	_____
05/27/22	8846299	Perform legal research regarding claim calculation in receivership cases	Pham, Matt D.	1.80	745.20	92,926.80	WO	HD	TR	_____

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05/27/22	8846300	Review and analyze relevant case law on claim calculation in receivership cases	Pham, Matt D.	1.30	538.20	93,465.00	WO	HD	TR	_____
05/27/22	8846301	Perform additional legal research regarding MIMO claim calculation in receivership cases	Pham, Matt D.	1.60	662.40	94,127.40	WO	HD	TR	_____
05/27/22	8848012	Work on the issues related to the disposition of disputed claims and draft email memorandum to counsel to summarize arguments/defenses and follow-up (1.40). Call/email with counsel to address the Receiver's plan for distribution, follow-up (.4).	Zaro, David	1.80	1,506.60	95,634.00	WO	HD	TR	_____
05/28/22	8843479	Revisions to claims allowance motion relating to procedure for future adjustments to claims, specific claim objections, and citations to exhibits (2.7) revisions to distribution plan and explanation of rising tide method (1.5) discuss same with Receiver (.6)	Fates, Edward (Ted)	4.80	3,088.80	98,722.80	WO	HD	TR	_____
05/29/22	8848214	Analysis/evaluation of emails, claims allowance, motion and distribution plan, draft revisions, email to Receiver related to issues/questions and follow-up.	Zaro, David	3.20	2,678.40	101,401.20	WO	HD	TR	_____
05/30/22	8844380	Work on Receiver's declaration in support of claims allowance and plan motion	Fates, Edward (Ted)	1.20	772.20	102,173.40	WO	HD	TR	_____
05/30/22	8848291	Further revisions to draft of the motion to allow/disallow claims and plan for distribution, follow-up.	Zaro, David	0.80	669.60	102,843.00	WO	HD	TR	_____

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05/31/22	8846782	Work on revisions, updates and edits to claims allowance and plan motion, Receiver declaration and distribution plan (3.4) discuss same with Receiver (.7) assist with issues relating to exhibits to declaration (.3)	Fates, Edward (Ted)	4.40	2,831.40	105,674.40	WO	HD	TR	_____
05/31/22	8848448	Revise draft of the memorandum of points and authorities as to claims allowance and plan of distribution (2.2). Conferences with counsel related to the revisions to the plan, revisions to claims objection and follow-up (.6) Further analysis and investigation as to documents/exhibits to support arguments (.8).	Zaro, David	3.60	3,013.20	108,687.60	WO	HD	TR	_____
05/31/22	8849193	Perform legal research regarding calculation of allowed claims in receiverships	Pham, Matt D.	1.30	538.20	109,225.80	WO	HD	TR	_____
05/31/22	8849214	Draft insert for claims/distributions motion regarding equitable calculation of 2Budz's claim	Pham, Matt D.	1.20	496.80	109,722.60	WO	HD	TR	_____
05/31/22	8849221	Confer with Ted Fates regarding argument in claims/distributions motion regarding 2Budz's claim	Pham, Matt D.	0.10	41.40	109,764.00	WO	HD	TR	_____
05/31/22	8849226	Perform additional legal research regarding receiver's ability to setoff claims	Pham, Matt D.	0.60	248.40	110,012.40	WO	HD	TR	_____
05/31/22	8849240	Continue drafting insert for claims/distribution motion regarding calculation/setoff of 2Budz's claim	Pham, Matt D.	1.00	414.00	110,426.40	WO	HD	TR	_____
05/31/22	8849673	Advise Receiver re: late claim issues (.2) Advise on issues relating to 2Budz disputed	Fates, Edward (Ted)	3.60	2,316.60	112,743.00	WO	HD	TR	_____

09/21/22 17:46:37 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			
		claim (.4) revise motion and declaration re: same (.7) final revisions to motion, declaration and distribution plan (1.6) communications with counsel for investors re: opposition to notice plan (.2) prepare proposed order (.3) analyze Wakefield opposition to briefing schedule in notice plan (.4)								
06/01/22	8851840	Follow-u on Ovation counsel's email and evaluate the issues related to the Nossaman settlement, and Ovation (.4). Review the version and related declaration/documents as to claims allowance/disallowance and plan (.7)/	Zaro, David	1.10	920.70	113,663.70	WO	HD	TR	_____
06/02/22	8867558	Analyze and advise Receiver on issues relating to notice plan for claims allowance motion, objections thereto, and posting of documents on receivership website	Fates, Edward (Ted)	0.50	321.75	113,985.45	WO	HD	TR	_____
06/03/22	8867564	Call with counsel for investor re: potential objection to rising tide / prior recovery rate calculation for claim (.5) analyze issues re: 2Budz claim and K-1 statement (.3)	Fates, Edward (Ted)	0.80	514.80	114,500.25	WO	HD	TR	_____
06/06/22	8867900	Communications with investors re: timing of distributions (.4) communications with counsel for J. Cohen (.2)	Fates, Edward (Ted)	0.60	386.10	114,886.35	WO	HD	TR	_____
06/07/22	8859014	Review status of the claims of CalPrivate and objection issue (.3). Prepare for/attend the meeting with CalPrivate's counsel and Receiver (.5). Follow-up meeting to work on strategy to settle with CalPrivate (.5).	Zaro, David	1.30	1,088.10	115,974.45	WO	HD	TR	_____

09/21/22 17:46:37 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	
06/07/22	8867912	Call/emails with counsel for CalPrivate Bank (1.4) discuss same with Receiver (.4) address inquiry from investor re: claims motion and proposed allowed claims (.3) discuss inquiry from counsel for investors re: tax forms and distributions with Receiver (.2) respond to same (.1)	Fates, Edward (Ted)	2.40	1,544.40	117,518.85	WO	HD	TR
06/08/22	8867913	Call with SEC counsel re: claims motion, disputed claims, distribution plan, and related issues (.5) analyze order on notice plan and discuss same and notice steps with Receiver (1.1) revise approve form of notice (.4) draft email to go out to investors and creditors (.5) assist Receiver in preparing responses to media inquiries regarding claims allowance and plan motion (.9) prepare notices to counsel for investors with disputed claims (1.4) assist Receiver in preparing website postings re: notice of claims allowance motion (.3)	Fates, Edward (Ted)	5.10	3,281.85	120,800.70	WO	HD	TR
06/09/22	8863756	Several calls with investor claimants and counsel related to pending motion, notice by the Receiver.	Zaro, David	0.40	334.80	121,135.50	WO	HD	TR
06/09/22	8867926	Analyze issues relating to objection to 2Budz claim, potential claims against 2Budz, and prepare correspondence to counsel for 2Budz re: same (1.4) discuss same with Receiver (.2) communications with counsel for J. Cohen re: investor settlement payments (.4) call with counsel for investor re: rising tide and recovery rate questions (.4) work on Receiver declaration re: notices of claims motion and settlement	Fates, Edward (Ted)	4.00	2,574.00	123,709.50	WO	HD	TR

09/21/22 17:46:37 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	
		approval motion (.9) discuss same and email notices with Receiver (.4) communications with counsel for investor with disputed claim (.3)							
06/10/22	8868700	Communications with counsel for investors re: disputed investor claims (.4) advise Receiver re: same (.1) revisions to Receiver declaration regarding notices (.4) discuss same with Receiver (.2)	Fates, Edward (Ted)	1.10	707.85	124,417.35	WO	HD	TR
06/13/22	8868708	Address call from trade creditor claimant (.3) discuss same with Receiver (.3) communications with counsel for 2Budz re: claim objection, potential clawback claim and proposed tolling agreement (.4) analyze and advise Receiver re: responses to specific investor inquiries re: claims motion and distributions (.4)	Fates, Edward (Ted)	1.40	900.90	125,318.25	WO	HD	TR
06/14/22	8862131	Analyze and respond to trade creditor inquiry re: notice and deadline to submit claims (.4) advise Receiver re: various disputed claim issues (.7) communications with counsel for investors re: claim issues (.3)	Fates, Edward (Ted)	1.40	900.90	126,219.15	WO	HD	TR
06/14/22	8864909	Several calls with claimants related to distribution plan, follow-up and email response.	Zaro, David	0.40	334.80	126,553.95	WO	HD	TR
06/15/22	8863602	Advise Receiver on issues relating to disputed claims and with responses to inquiries from investors re: MIMO and rising tide	Fates, Edward (Ted)	1.60	1,029.60	127,583.55	WO	HD	TR

09/21/22 17:46:37 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	
06/17/22	8868720	Respond to inquiries re: claims and distributions from counsel for investors	Fates, Edward (Ted)	0.70	450.45	128,034.00	WO	HD	TR
06/21/22	8868670	Advise Receiver on investor and trade creditor notice issues for claims approval motion	Fates, Edward (Ted)	0.20	128.70	128,162.70	WO	HD	TR
06/21/22	8869078	Communications with counsel for investor re: withdrawal of claim dispute (.2) advise Receiver re: same (.1)	Fates, Edward (Ted)	0.30	193.05	128,355.75	WO	HD	TR
06/22/22	8870026	Discuss issues relating to disputed investor claim with Receiver and counsel for investor	Fates, Edward (Ted)	0.40	257.40	128,613.15	WO	HD	TR
06/27/22	8874507	Advise Receiver re: specific claim disputes and responses to investors re: same	Fates, Edward (Ted)	0.80	514.80	129,127.95	WO	HD	TR
06/30/22	8879703	Work on subpoena to J. Cohen regarding settlement payments made to to losing investors with claims (.5) communications with counsel for J. Cohen re: same (.4).	Fates, Edward (Ted)	0.90	579.15	129,707.10	WO	HD	TR
06/30/22	8882604	Review and respond to emails and draft subpoena to Joe Cohen of ABC Strategies.	Kaup, John	0.40	126.00	129,833.10	WO	HD	TR

Proforma Summary

Timekeeper

Number	Timekeeper	Hours	Rate	Amounts
000313	Zaro, David	49.80	837.00	41,682.60
000820	Kaup, John	0.40	315.00	126.00
001665	Fates, Edward (Ted)	129.90	643.50	83,590.65
001842	Del Castillo, Joshua	1.10	643.50	707.85
002510	Pham, Matt D.	9.00	414.00	3,726.00
		190.20		\$129,833.10

09/21/22 17:46:37 PROFORMA STATEMENT FOR MATTER 378827.00006 (Krista Freitag, as Receiver for ANI Deve) (SEC v. Champion-Cain - Claims & Distribu)

Proforma Summary

Timekeeper Number	Timekeeper	Hours	Rate	Amounts
Subtotal Fees				\$129,833.10
Discount				0.00
Total Fees				129,833.10
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 09/21/22

	Fiscal YTD			Calendar YTD			LTD		
	Total	Fees	Disb.	Total	Fees	Disb.	Total	Fees	Disbursements
Worked	74,448.45	74,448.45	0.00	204,281.55	204,281.55	0.00	643,958.10	643,958.10	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	275,315.85	275,315.85	0.00						
Balance									
AR Balance	0.00	0.00	0.00						
Unalloc	0.00								
Payment									
Client Trust	0.00								
Balance									

Billing Address

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

09/21/22 17:46:37 PROFORMA STATEMENT FOR MATTER 378827.00006 (Krista Freitag, as Receiver for ANI Deve) (SEC v. Champion-Cain - Claims & Distribu)

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

09/21/22 17:46:40 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: 1180820
 Client/Matter Joint Group # 378827-1 Client Matter Number:

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

Trans Date	Index	Description of Service Rendered	Timekeeper	Hours	Fees	Sum	Circle	Action	
01/13/22	8692787	Review order approving SunTrust settlement in FL litigation, advise Receiver and local counsel in FL re: same	Fates, Edward (Ted)	0.30	193.05	193.05	WO	HD	TR
01/27/22	8705908	Communications with Receiver and local counsel in FL re: settlement payment	Fates, Edward (Ted)	0.20	128.70	321.75	WO	HD	TR
02/07/22	8720282	Advise Receiver re: payment of court reporter invoice for deposition in SunTrust case	Fates, Edward (Ted)	0.10	64.35	386.10	WO	HD	TR
03/25/22	8769755	Communications with counsel for P. Luu re: continuance of status conference in pending state court action, review and sign stipulation re: same	Fates, Edward (Ted)	0.30	193.05	579.15	WO	HD	TR

Proforma Summary

Timekeeper Number	Timekeeper	Hours	Rate	Amounts
001665	Fates, Edward (Ted)	0.90	643.50	579.15
		0.90		\$579.15
Subtotal Fees				\$579.15

09/21/22 17:46:40 PROFORMA STATEMENT FOR MATTER 378827.00008 (Krista Freitag, as Receiver for ANI Deve) (SEC v. Champion-Cain - Pending Litigatio)

Proforma Summary

Timekeeper

Number	Timekeeper	Hours	Rate	Amounts
Discount				0.00
Total Fees				579.15
Total Disbursements				0.00

Attorney Billing Instructions

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

Billing Instructions

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

Account Summary – As Of 09/21/22

	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	25,374.15	25,374.15	0.00						
Balance									
AR Balance	0.00	0.00	0.00						
Unalloc	0.00								
Payment									
Client Trust	0.00								
Balance									

Billing Address

Krista Freitag, as Receiver for ANI Development, LLC, et al.
E3 Advisors

09/21/22 17:46:40 PROFORMA STATEMENT FOR MATTER 378827.00008 (Krista Freitag, as Receiver for ANI Deve) (SEC v. Champion-Cain - Pending Litigatio)

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

09/21/22 17:46:41 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: 1180820
 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	
02/04/22	8718234	Revisions to Receiver's sixth interim fee application, discuss same with Receiver (1.1) meet and confer communications with SEC counsel (.1)	Fates, Edward (Ted)	1.20	772.20	772.20	WO	HD	TR
02/15/22	8728315	Revisions to Receiver's sixth fee application, notice, and proposed order (.3) communications with Receiver re: same (.1) call to court chambers regarding hearing date for fee applications (.1)	Fates, Edward (Ted)	0.50	321.75	1,093.95	WO	HD	TR
05/11/22	8823799	Revisions to Receiver's seventh interim fee application (.7) meet and confer communications with SEC counsel regarding seventh interim fee applications (.2)	Fates, Edward (Ted)	0.90	579.15	1,673.10	WO	HD	TR

Proforma Summary

Timekeeper Number	Timekeeper	Hours	Rate	Amounts
001665	Fates, Edward (Ted)	2.60	643.50	1,673.10
		2.60		\$1,673.10

09/21/22 17:46:41 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
	Subtotal Fees			\$1,673.10
	Discount			0.00
	Total Fees			1,673.10
	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 09/21/22

	Fiscal YTD			Calendar YTD			LTD		
	Total	Fees	Disb.	Total	Fees	Disb.	Total	Fees	Disbursements
Worked	1,721.25	1,721.25	0.00	3,394.35	3,394.35	0.00	11,781.00	11,781.00	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	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	6,233.40	6,233.40	0.00						
Balance									
AR Balance	0.00	0.00	0.00						
Unalloc	0.00								
Payment									
Client Trust	0.00								
Balance									

Billing Address

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

09/21/22 17:46:41 PROFORMA STATEMENT FOR MATTER 378827.00009 (Krista Freitag, as Receiver for ANI Deve) (SEC v. Champion-Cain - Employment/Fees)

E3 Advisors
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