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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

**ELEVENTH 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: December 4, 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 Eleventh Interim Application for Payment of Fees and Reimbursement
 6 of Expenses (the "Application"). This Application covers the six-month period from
 7 January 1, 2023 through June 30, 2023 (the "Application Period"), and seeks
 8 approval of \$651,063.15 in fees and \$28,530.15 in expenses, and an order
 9 authorizing the Receiver to pay, on an interim basis, 80% of the fees incurred
 10 (\$520,850.52) and 100% of the expenses incurred (\$28,530.15).

11 **I. INTRODUCTION.**

12 This equity receivership involves a large, complex, and wide-ranging group
 13 of enterprises and assets associated with the Ponzi scheme that is the subject of the
 14 Complaint filed by the Securities and Exchange Commission ("Commission"). The
 15 Receiver was appointed on September 3, 2019. Dkt. 6.

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

27 This Application should be read in conjunction with the Receiver's Fourteenth
 28 and Fifteenth Interim Reports and Recommendations, filed on March 10, 2023 and

May 25, 2023 (Dkt. 966, 1002), which describe in detail the Receiver's activities during the six-month Application Period.

This Application seeks approval of \$651,063.15 in fees for a total of 1,088.30 hours worked, and payment on an interim basis of 80% of that amount, or \$520,850.52. Allen Matkins has agreed to discount its standard hourly rates by 10% for this case. The work performed is described task-by-task in **Exhibit A**¹ and is broken down into the following categories:

Category	Hours	Amount
General Receivership	8.90	\$6,341.85
Asset Investigation & Recovery	31.30	\$17,969.85
Reporting	5.00	\$3,442.50
Operations & Asset Sales	0.50	\$344.25
Claims & Distributions	213.90	\$151,461.45
Third Party Recoveries	44.10	\$24,879.15
Pending Litigation	0.60	\$413.10
Employment/Professional Fees	4.10	\$2,822.85
General Clawback Claims & Settlements	544.30	\$308,639.25
Claims Against Kim Peterson et al.	235.60	\$134,748.90
Total Fees	1,088.30	\$651,063.15

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

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

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

3 1. General Receivership.

4 Allen Matkins' work in this category relates to the related criminal cases
5 against Gina Champion-Cain and Cris Torres, including communications with the
6 United States Attorney's Office and counsel for Gina Champion-Cain ("GCC")
7 regarding restitution issues. Allen Matkins also advised the Receiver regarding
8 inquiries about the receivership from the media and assisted with tax questions
9 involving the receivership estate. The reasonable and necessary fees for Allen
10 Matkins' work in this category total \$6,341.85.

11 2. Asset Investigation & Recovery.

12 The services in this category relate generally to efforts to identify, secure,
13 preserve, investigate and recover receivership assets. During the Application
14 Period, these services focused on (a) investigating, evaluating and advising the
15 Receiver regarding rights, remedies, and potential steps to recover on an investment
16 made in a music festival series called Santaluz Wonderfront, and (b) analyzing and
17 advising the Receiver on issues regarding trademarks held by the Receivership
18 Entities. Paralegal time spent managing documents received via subpoenas and
19 other discovery requests, and producing requested documents is also included in this
20 category. The reasonable and necessary fees for Allen Matkins' work in this
21 category total \$17,969.85.

22 3. Reporting.

23 Allen Matkins' services in this category focus on assisting the Receiver in
24 preparing her Fourteenth and Fifteenth Interim Reports and Recommendations,
25 which were filed on March 10, 2023 and May 25, 2023, respectively. Dkt. 966,
26 1002. The reports includes detailed summaries of the Receiver's activities, funds
27 recovered, real and personal property assets, property taxes, insurance, loans and
28 other investments, investigation of third party claims, pending litigation, and other

1 matters. The reports also detail the receipts and disbursements for the receivership
2 estate since the Receiver's appointment and provides her recommendations for the
3 continued administration of the receivership. The reasonable and necessary fees for
4 Allen Matkins' work in this category total \$3,442.50.

5 4. Operations & Asset Sales.

6 Allen Matkins' time in this category relates to assisting the Receiver with the
7 sale of a liquor license associated with a former Patio Marketplace restaurant. The
8 reasonable and necessary fees for Allen Matkins' work in this category total
9 \$344.25.

10 5. Claims & Distributions.

11 Services rendered in this category focus on disputed claims against the
12 receivership estate and distribution of receivership estate assets. Most of the work
13 relating to disputed claims focused on the disputed claim of CalPrivate Bank
14 (“CalPrivate”). Allen Matkins advised the Receiver and handled settlement
15 negotiations with counsel for CalPrivate. The firm assisted the Receiver in
16 preparing a mediation statement and attended the mediation with Judge Goddard
17 held on January 13, 2023, as well as follow-up settlement discussions and meetings.
18 Allen Matkins analyzed various legal issues relating to the potential settlement,
19 including the assignment of claims by CalPrivate to the receivership estate. This
20 work resulted in a mediator’s proposal from Judge Goddard that was accepted by
21 both the Receiver and CalPrivate. The firm then prepared a motion for approval of
22 the settlement and a reply brief responding to the opposition filed by Kim Peterson
23 and his entities (“Peterson Parties”). The settlement was approved by the Court on
24 April 24, 2023. Dkt. 995.

25 Allen Matkins also assisted in resolving issues relating to the disputed claims
26 of 2Budz, the Wakefield Parties, and the investors represented by attorney Jeffrey
27 Zinder such that distributions under the Court-approved settlement with Chicago
28 Title could be made to them.

1 Allen Matkins further assisted the Receiver in analyzing the Court's order
2 approving the Receiver's proposed treatment of claims and proposed distribution
3 plan and in preparing to make an interim distribution of receivership estate funds.
4 After the Peterson Parties filed a motion to stay distributions, Allen Matkins
5 analyzed the issues, advised the Receiver, and assisted in preparing an opposition to
6 the motion. Attorney Ted Fates attended the hearing on the motion, which was held
7 on April 10, 2023. The motion was denied the same day. Dkt. 987. The Peterson
8 Parties then filed an emergency motion with the Ninth Circuit, which Allen Matkins
9 assisted the Receiver in opposing. That motion was also denied. Dkt. 996.

10 Allen Matkins also addressed issues and communicated with counsel for the
11 Peterson Parties regarding their appeal of the Court's order approving the Receiver's
12 proposed treatment of claims and proposed distribution plan.

13 Allen Matkins assisted with gathering information from counsel for investors
14 and related third parties regarding settlement payments made to investors that
15 required adjustments to be made to the Receiver's proposed allowed claim amounts
16 and prior recovery rates for purposes of the Rising Tide distribution method.
17 Ultimately, the Receiver was able to make an interim distribution to investors and
18 creditors with allowed claims pursuant to the approved Distribution Plan and Notice
19 of Interim Distributions. The total amount distributed as part of the interim
20 distribution was \$21 million. This distribution brought the total investor recovery
21 up to 90.92% of MIMO net losses (with some investors having received 100% or
22 more of their MIMO net losses pursuant to Chicago Title settlements).

23 Finally, the firm also assisted the Receiver with issues related to
24 disseminating information about the receivership to investors and creditors,
25 including information provided on the receivership website
26 (www.anireceivership.com). The reasonable and necessary fees for Allen Matkins'
27 work in this category total \$151,461.45.

28

1 6. Third Party Recoveries.

2 This portion of the Application pertains to work on claims against third
3 parties to recover amounts for the benefit of the receivership estate, but not
4 including Clawback Claims, which have their own category and are discussed
5 below. Allen Matkins assisted the Receiver in analyzing claims to recover on a
6 promissory note and guaranty in favor of ANI issued by a company called Illa
7 Designs and its owner Eric Churilla. The firm handled communications and
8 negotiations with Mr. Churilla. When the matter could not be resolved through
9 settlement, Allen Matkins assisted in preparing and filing a Complaint against Illa
10 Designs and Churilla for breach of the note and guaranty. The matter did then get
11 settled, which Allen Matkins assisted in negotiating and documenting. The firm
12 prepared a motion for approval of the settlement, which was approved by the Court
13 on April 18, 2023. Dkt. 993. The settlement is expected to generate a recovery of
14 \$265,000 for the receivership estate once the Churillas complete a sale of their
15 property located in Texas, on which the receivership estate has a recorded Deed of
16 Trust. The reasonable and necessary fees for Allen Matkins' work in this category
17 total \$24,879.15.

18 7. Pending Litigation.

19 Services performed in this category include the analysis and management of
20 pending pre-receivership actions in which one or more of the Receivership Entities
21 are parties. Specifically, work within this category relates to the action that was
22 pending in San Diego Superior Court known as *Luu v. The Patio Restaurant*
23 *Grp., LLC, et al.*, San Diego Super. Ct. Case No. 37-2019-00015451-CU-OE-CTL,
24 which was a putative class action filed by a former employee (which action was
25 stayed pursuant to the litigation stay in the Appointment Order). The action has
26 since been voluntarily dismissed. The reasonable and necessary fees for Allen
27 Matkins' work in this category total \$413.10.

28

1 8. 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 Ninth and Tenth Interim Fee Applications (each covering six months of
6 work) and with meet and confer communications with counsel for the Commission.
7 The fee applications were approved on February 27 and April 18, 2023. The
8 reasonable and necessary fees for Allen Matkins' work in this category total
9 \$2,822.85.

10 9. 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 \$308,639.25. To date, the Receiver has recovered more than \$8.7 million for the
18 receivership estate through the pursuit of clawback claims, which amount represents
19 approximately 20% of the total distributions of \$43 million made by the Receiver to
20 date.

21 10. Claims Against Kim Peterson.

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

\$134,748.90. Kim Peterson and his entities, collectively, are the largest net winner in the Ponzi scheme, having received more than \$12 million in net profits.

A. Summary of Expenses Requested for Reimbursement.

Allen Matkins requests that the Court approve reimbursement of \$28,530.15 in out-of-pocket costs. The itemization of such expenses is summarized below by billing category.

Category	Total
Deposition/Court Transcript Fees	\$1,993.50
Messenger/FedEx Fees	\$172.44
Service of Process	\$1,657.66
Recordation Fees	\$46.00
Court/Filing Fees	\$1,189.90
Duplication	\$291.30
PACER/Document Research	\$12,170.25
E-Discovery	\$11,009.10
Total	\$28,530.15

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

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

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

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

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

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

27 Allen Matkins has submitted a detailed fee application which describes the
 28 nature of the services rendered. *See* **Exhibit A**. Allen Matkins has endeavored to

1 staff matters as efficiently as possible while remaining cognizant of the complexity
 2 of issues presented. As noted above, the request for fees is based on Allen Matkins'
 3 customary billing rates charged for comparable services provided in other matters,
 4 less a 10% discount. Moreover, Allen Matkins wrote off and did not charge for
 5 19.50 hours of work (\$7,934.85 in fees) and \$21.20 in disbursements.

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

16 **III. CONCLUSION.**

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

- 18 1. Approving Allen Matkins' fees of \$651,063.15;
- 19 2. Authorizing and directing the Receiver to pay 80% of approved fees, or
 20 \$520,850.52, from the assets of the Receivership Entities;
- 21 3. Approving Allen Matkins' costs in the amount of \$28,530.15, and
 22 authorizing and directing the Receiver to reimburse such costs in full; and
- 23 4. For such other and further relief as the Court deems appropriate.

24 Dated: October 31, 2023

ALLEN MATKINS LECK GAMBLE
 MALLORY & NATSIS LLP

By: s/Edward G. Fates

DAVID R. ZARO
 EDWARD G. FATES
 MATTHEW D. PHAM
 Attorneys for Receiver
 KRISTA FREITAG

EXHIBIT INDEX

EXHIBIT NO.	DESCRIPTION	PAGE NO.
Exhibit A	Detailed Descriptions of Services Rendered	15

EXHIBIT A

EXHIBIT A

09/29/23 15:58:27 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: 04/27/23 Matter Name: SEC v. Champion-Cain - General Receivers
 Proforma Number: 1235483
 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	
01/23/23	9091622	Advise Receiver regarding responses to further media inquiries concerning case and receivership	Fates, Edward (Ted)	0.30	206.55	206.55	WO	HD	TR
01/26/23	9096341	Assist Receiver in addressing SD Union-Tribune inquiries concerning receivership	Fates, Edward (Ted)	0.20	137.70	344.25	WO	HD	TR
03/16/23	9160061	Call/emails with counsel for Champion-Cain regarding issues relating to criminal restitution, receivership distributions, cooperation and request for reduction in sentence (.5) advise Receiver re: same (.2)	Fates, Edward (Ted)	0.70	481.95	826.20	WO	HD	TR
03/17/23	9153035	Discuss wind up and termination of receivership entity with Receiver	Fates, Edward (Ted)	0.20	137.70	963.90	WO	HD	TR
03/22/23	9165306	Work on revisions to draft letter from Receiver regarding Champion-Cain cooperation (.8) discuss same with Receiver (.4) communications with AUSA and counsel for Champion-Cain re: same and status of distributions / restitution issues (.9)	Fates, Edward (Ted)	2.10	1,445.85	2,409.75	WO	HD	TR

09/29/23 15:58:27 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	
03/23/23	9158744	Discuss communication with AUSA regarding Champion-Cain sentencing and restitution issues with Receiver	Fates, Edward (Ted)	0.30	206.55	2,616.30	WO	HD	TR
03/27/23	9162691	Communications with counsel for Champion-Cain regarding withdrawal as counsel and service issues going forward	Fates, Edward (Ted)	0.20	137.70	2,754.00	WO	HD	TR
04/10/23	9180145	Assist Receiver in addressing media inquiries concerning anticipated distributions, rising tide calculations, and remaining unpaid claim amounts	Fates, Edward (Ted)	1.30	895.05	3,649.05	WO	HD	TR
04/28/23	9198963	Call/emails with Receiver and tax counsel regarding receivership tax issues	Fates, Edward (Ted)	0.50	344.25	3,993.30	WO	HD	TR
04/28/23	9200439	Telephne confernece with Receiver. Tax analysis re. Form 1099s.	Kraus, Katherine	0.70	535.50	4,528.80	WO	HD	TR
05/01/23	9205173	Assist with issues relating to receivership tax question	Fates, Edward (Ted)	0.30	206.55	4,735.35	WO	HD	TR
05/01/23	9205232	Tax analysis regarding information returns.	Kraus, Katherine	2.10	1,606.50	6,341.85	WO	HD	TR

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

Trans Date	Index	Type	Quantity	Amt	Circle	Action	
01/01/23	2800212	EDISC – CS Disco, Inc. - Monthly Hosting for January 2023	0.00	1,671.56	WO	HD	TR
01/03/23	2797541	BW – Duplication - Black & White Copies	1,652.00	165.20	WO	HD	TR
01/03/23	2797546	BW – Duplication - Black & White Copies	15.00	1.50	WO	HD	TR

09/29/23 15:58:27 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				
01/05/23	2797768	FILING – One Legal - Filing Fee for Superior Court of California, San Diego County, Request for Dismissal with Prejudice - Entire Action	0.00	22.50	WO	HD	TR	_____
01/06/23	2797839	BW – Duplication - Black & White Copies	98.00	9.80	WO	HD	TR	_____
01/06/23	2801205	RSRCH – WestLaw	0.00	43.00	WO	HD	TR	_____
01/09/23	2798004	BW – Duplication - Black & White Copies	782.00	78.20	WO	HD	TR	_____
01/10/23	2798183	BW – Duplication - Black & White Copies	2.00	0.20	WO	HD	TR	_____
01/13/23	2799693	FILING – -USDC Southern District of California, Filing fee for Illa Designs complaint	0.00	402.00	WO	HD	TR	_____
01/13/23	2801206	RSRCH – WestLaw	0.00	43.00	WO	HD	TR	_____
01/13/23	2804790	POS – Service of Process - First Legal LLC - ILLA DESIGNS LLC; SUMMONS AND COMPLAINT	0.00	334.95	WO	HD	TR	_____
01/13/23	2804791	POS – Service of Process - First Legal LLC - JOHN ERIC CHURILLA; SUMMONS AND COMPLAINT	0.00	187.08	WO	HD	TR	_____
01/13/23	2804792	POS – Service of Process - First Legal LLC - NICOLE LORRAINE CHURILLA; SUMMONS AND COMPLAINT	0.00	187.08	WO	HD	TR	_____
01/30/23	2804447	POS – First Legal Network, LLC - SANTALUZ WONDERFRONT LLC; SUBPOENA TO PRODUCE DOCUMENTS	0.00	141.12	WO	HD	TR	_____
01/31/23	2801793	RECORD – Clark County Reorder - Recording for Substitution of Trustee and Full Reconveyance	0.00	46.00	WO	HD	TR	_____
02/01/23	2801820	BW – Duplication - Black & White Copies	2.00	0.20	WO	HD	TR	_____
02/01/23	2803011	MSNGR – Federal Express - Ship To: - Clark County Recorder s Office	0.00	20.67	WO	HD	TR	_____
02/01/23	2803923	EDISC – CS Disco, Inc. - Monthly Hosting for February 2023	0.00	1,713.02	WO	HD	TR	_____
02/02/23	2804448	POS – First Legal Network, LLC - SANTALUZ	0.00	248.84	WO	HD	TR	_____

09/29/23 15:58:27 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				
02/06/23	2804453	WONDERFRONT LLC; SUBPOENA TO PRODUCE DOCUMENTS POS – First Legal Network, LLC - SANTALUZ WONDERFRONT LLC; SUBPOENA TO PRODUCE DOCUMENTS	0.00	326.84	WO	HD	TR	_____
02/09/23	2805679	RSRCH – WestLaw	0.00	51.60	WO	HD	TR	_____
02/10/23	2805479	RSRCH – WestLaw	0.00	228.00	WO	HD	TR	_____
02/13/23	2802919	COLOR – Duplication - Color Copies	8.00	0.80	WO	HD	TR	_____
02/14/23	2805481	RSRCH – WestLaw	0.00	869.20	WO	HD	TR	_____
02/14/23	2805680	RSRCH – WestLaw	0.00	51.60	WO	HD	TR	_____
02/15/23	2805480	RSRCH – WestLaw	0.00	103.20	WO	HD	TR	_____
02/15/23	2805482	RSRCH – WestLaw	0.00	700.80	WO	HD	TR	_____
02/17/23	2804008	COURT – Other Court Charges - John Kaup - San Diego Superior Court - obtain copy of Declaration from Court docket.	0.00	5.80	WO	HD	TR	_____
02/21/23	2804007	COURT – Other Court Charges - John Kaup - San Diego Superior Court - Obtain copy of Appendix of Evidence from Court Docket.	0.00	50.00	WO	HD	TR	_____
02/24/23	2804534	BW – Duplication - Black & White Copies	15.00	1.50	WO	HD	TR	_____
02/28/23	2806648	BW – Duplication - Black & White Copies	94.00	9.40	WO	HD	TR	_____
02/28/23	2810306	RSRCH – WestLaw	0.00	1,516.80	WO	HD	TR	_____
03/01/23	2806961	DEPO – Veritext, LLC - Deposition Transcript of Horacio Valeiras Taken on 01/04/2023	0.00	1,993.50	WO	HD	TR	_____
03/01/23	2809693	EDISC – CS Disco, Inc. - Monthly Hosting for March 2023	0.00	1,693.64	WO	HD	TR	_____

09/29/23 15:58:27 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				
03/01/23	2810307	RSRCH – WestLaw	0.00	876.00	WO	HD	TR	_____
03/02/23	2810308	RSRCH – WestLaw	0.00	404.80	WO	HD	TR	_____
03/06/23	2807042	BW – Duplication - Black & White Copies	41.00	4.10	WO	HD	TR	_____
03/07/23	2807251	BW – Duplication - Black & White Copies	15.00	1.50	WO	HD	TR	_____
03/08/23	2807336	BW – Duplication - Black & White Copies	96.00	9.60	WO	HD	TR	_____
03/10/23	2807452	BW – Duplication - Black & White Copies	28.00	2.80	WO	HD	TR	_____
03/13/23	2810309	RSRCH – WestLaw	0.00	802.80	WO	HD	TR	_____
03/14/23	2810301	RSRCH – WestLaw	0.00	1,018.00	WO	HD	TR	_____
03/15/23	2810302	RSRCH – WestLaw	0.00	103.20	WO	HD	TR	_____
03/16/23	2810303	RSRCH – WestLaw	0.00	154.80	WO	HD	TR	_____
03/17/23	2810304	RSRCH – WestLaw	0.00	464.40	WO	HD	TR	_____
03/22/23	2810305	RSRCH – WestLaw	0.00	154.80	WO	HD	TR	_____
03/22/23	2810521	RSRCH – WestLaw	0.00	103.20	WO	HD	TR	_____
03/24/23	2814997	RSRCH – WestLaw	0.00	103.20	WO	HD	TR	_____
03/27/23	2809009	BW – Duplication - Black & White Copies	28.00	2.80	WO	HD	TR	_____
03/28/23	2814998	RSRCH – WestLaw	0.00	136.80	WO	HD	TR	_____
03/31/23	2814311	MSNGR – Messenger - Nationwide Legal LLC - NINTH CIRCUIT COURT OF APPEALS	0.00	55.50	WO	HD	TR	_____

09/29/23 15:58:27 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	
03/31/23	2817115	COURT – Other Court Charges - Heather Riley - SD SUPERIOR CRT ROA - Copies of Proposed Order and Minute Order	0.00	3.00	WO	HD	TR	_____
04/01/23	2814047	EDISC – CS Disco, Inc. - Monthly Hosting for April 2023	0.00	2,001.62	WO	HD	TR	_____
04/04/23	2822468	DCSRCH – Document Search - - PACER - Usage 1st QTR	0.00	22.40	WO	HD	TR	_____
04/04/23	2822469	DCSRCH – Document Search - - PACER - Usage 1st QTR	0.00	1.00	WO	HD	TR	_____
04/04/23	2822470	DCSRCH – Document Search - - PACER - Usage 1st QTR	0.00	5.10	WO	HD	TR	_____
04/11/23	2812119	BW – Duplication - Black & White Copies	24.00	2.40	WO	HD	TR	_____
04/12/23	2815203	RSRCH – WestLaw	0.00	51.60	WO	HD	TR	_____
04/13/23	2814999	RSRCH – WestLaw	0.00	120.00	WO	HD	TR	_____
04/14/23	2815000	RSRCH – WestLaw	0.00	103.20	WO	HD	TR	_____
04/16/23	2815001	RSRCH – WestLaw	0.00	154.80	WO	HD	TR	_____
04/17/23	2815002	RSRCH – WestLaw	0.00	532.80	WO	HD	TR	_____
04/18/23	2812600	BW – Duplication - Black & White Copies	2.00	0.20	WO	HD	TR	_____
04/18/23	2813752	MSNGR – Federal Express - Ship To: - San Diego Recorder County Cler	0.00	16.87	WO	HD	TR	_____
04/19/23	2815204	RSRCH – WestLaw	0.00	110.40	WO	HD	TR	_____
04/24/23	2822955	MSNGR – Messenger - First Legal LLC - FIRST LEGAL	0.00	20.00	WO	HD	TR	_____
04/24/23	2822956	FILING – Filing Fees - First Legal LLC - TRAVIS COUNTY RECORDERS DEED OF TRUST ASSIGNMENT OF LEASES Advance \$70.00	0.00	105.75	WO	HD	TR	_____

09/29/23 15:58:27 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				
04/26/23	2819387	RSRCH – WestLaw	0.00	272.40	WO	HD	TR	_____
04/26/23	2822969	MSNGR – Messenger - First Legal LLC - FIRST LEGAL	0.00	20.00	WO	HD	TR	_____
04/26/23	2822970	FILING – Filing Fees - First Legal LLC - SAN DIEGO CO. RECORDER SUBSTITUTION OF TRUSTEE AND FULL RECONVEYANCE	0.00	35.75	WO	HD	TR	_____
04/28/23	2819388	RSRCH – WestLaw	0.00	213.60	WO	HD	TR	_____
05/01/23	2817501	POS – First Legal Network, LLC - San Diego County Recorder, Substitution of Trustee and Full Reconveyance	0.00	231.75	WO	HD	TR	_____
05/01/23	2818011	EDISC – CS Disco, Inc. - Monthly Hosting for May 2023	0.00	1,847.39	WO	HD	TR	_____
05/03/23	2819389	RSRCH – WestLaw	0.00	670.00	WO	HD	TR	_____
05/04/23	2819390	RSRCH – WestLaw	0.00	220.80	WO	HD	TR	_____
05/05/23	2819384	RSRCH – WestLaw	0.00	51.60	WO	HD	TR	_____
05/09/23	2816247	STATU – One Legal - Filing Fees for Superior Court of California, San Diego County - Motion - Other, Proof of Service	0.00	15.95	WO	HD	TR	_____
05/09/23	2816264	BW – Duplication - Black & White Copies	9.00	0.90	WO	HD	TR	_____
05/09/23	2817691	MSNGR – Nationwide Legal, LLC - SAN DIEGO/SAN DIEGO SUPERIOR COURT, Deliver Courtesy	0.00	39.40	WO	HD	TR	_____
05/09/23	2819385	RSRCH – WestLaw	0.00	120.00	WO	HD	TR	_____
05/09/23	2819632	RSRCH – WestLaw	0.00	51.60	WO	HD	TR	_____
05/09/23	2822320	FILING – Nationwide Legal, LLC - SAN DIEGO/SAN DIEGO SUPERIOR COURT, JOINT STIPULATION AND PROOF OF SERVICE -DEFENDANT KIM H. PETERSON FIRST APPEARANCE FEES	0.00	521.00	WO	HD	TR	_____

09/29/23 15:58:27 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	
05/12/23	2816597	BW – Duplication - Black & White Copies	2.00	0.20	WO	HD	TR	_____
05/12/23	2819386	RSRCH – WestLaw	0.00	1,088.80	WO	HD	TR	_____
05/12/23	2821129	COURT – Other Court Charges - Heather Riley - SD SUPERIOR CRT ROA - Fee for copy of answer (Case No. 2019-58664)	0.00	6.20	WO	HD	TR	_____
06/01/23	2823103	EDISC – CS Disco, Inc. - Monthly Hosting for June 2023	0.00	2,081.87	WO	HD	TR	_____
06/05/23	2821979	DCSRCH – First Legal Network, LLC - SDSC-SAN DIEGO, Notice of Case Assignment and Summons	0.00	89.75	WO	HD	TR	_____
06/06/23	2825950	COURT – Other Court Charges - Heather Riley - SD SUPERIOR CRT ROA - Obtain copy of Civil Case Cover Sheet	0.00	2.00	WO	HD	TR	_____
06/15/23	2821486	STATU – One Legal - Filing Fees for Superior Court of California, San Diego County - Notice of Ruling, Proof of Service	0.00	19.95	WO	HD	TR	_____
06/16/23	2824135	RSRCH – WestLaw	0.00	361.20	WO	HD	TR	_____

Proforma Summary

Timekeeper Number	Timekeeper	Hours	Rate	Amounts
001665	Fates, Edward (Ted)	6.10	688.50	4,199.85
002372	Kraus, Katherine	2.80	765.00	2,142.00
		8.90		\$6,341.85
Subtotal Fees				\$6,341.85
Discount				0.00
Total Fees				6,341.85
Total Disbursements				28,530.15

Attorney Billing Instructions

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

09/29/23 15:58:27 PROFORMA STATEMENT FOR MATTER 378827.00002 (Krista Freitag, as Receiver for ANI Deve) (SEC v. Champion-Cain - General Receivers)

Billing Instructions

expires 6/30/2024: 10% off standard rates (automatic); no text editing; copies @ .10

Account Summary – As Of 09/29/23

	Fiscal YTD			Calendar YTD			LTD		
	Total	Fees	Disb.	Total	Fees	Disb.	Total	Fees	Disbursements
Worked	1,634.50	1,188.00	446.50	36,060.00	7,529.85	28,530.15	494,909.43	87,685.20	407,224.23
Unbilled Adj	0.00	0.00	0.00	0.00	0.00	0.00	350.19	0.45	349.74
Billed	0.00	0.00	0.00	151,260.30	16,383.60	134,876.70	80,154.90	80,154.90	378,694.08
Collected	0.00	0.00	0.00	151,260.30	16,383.60	134,876.70	458,848.98	80,154.90	378,694.08
AR Write Off	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00
WIP Balance	18,687.10	7,529.85	11,157.25						
AR Balance	0.00	0.00	0.00						
Unalloc Payment	0.00								
Client Trust Balance	0.00								

Billing Address

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

09/29/23 15:58:29 PROFORMA STATEMENT FOR MATTER 378827.00003 (Krista Freitag, as Receiver for ANI Deve) (SEC v. Champion-Cain - Asset Investigati)

Preliminary Billing Form

Billing Atty: 001665 - Fates, Edward (Ted) Matter #: 378827.00003 Client Name: Krista Freitag, as Receiver for ANI Deve
 Date of Last Billing: 04/27/23 Matter Name: SEC v. Champion-Cain - Asset Investigati
 Proforma Number: 1235483
 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	
01/09/23	9088406	Analyze and advise G. Rodriguez on issues relating to ANI investment in Wonderfront Festival	Fates, Edward (Ted)	0.40	275.40	275.40	WO	HD	TR
01/11/23	9092629	Analysis and determination of responsive documents in preparation for attorney review.	Peng, Simona	0.80	270.00	545.40	WO	HD	TR
01/17/23	9092682	Analysis and determination of responsive documents in preparation for attorney review.	Peng, Simona	0.50	168.75	714.15	WO	HD	TR
01/18/23	9092694	Analysis and determination of responsive documents in preparation for attorney review.	Peng, Simona	0.80	270.00	984.15	WO	HD	TR
01/19/23	9091453	Analyze documents/issues re: ANI transfer relating to investment in Wonderfront Festival and investigation into membership units and value of same (1.4) discuss same with G. Rodriguez (.6) work on letter to attorney for Wonderfront and accompanying subpoena (1.9)	Fates, Edward (Ted)	3.90	2,685.15	3,669.30	WO	HD	TR

09/29/23 15:58:29 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			
01/19/23	9092712	Analysis and determination of responsive documents in preparation for attorney review.	Peng, Simona	0.50	168.75	3,838.05	WO	HD	TR	_____
01/24/23	9093447	Follow up communications with counsel for Santaluz Wonderfront, LLC regarding ANI investment	Fates, Edward (Ted)	0.40	275.40	4,113.45	WO	HD	TR	_____
01/25/23	9094275	Communications with former counsel for Wondefront entity and principals of same regarding ANI investment (.8) advise Receiver re: same (.3)	Fates, Edward (Ted)	1.10	757.35	4,870.80	WO	HD	TR	_____
01/30/23	9099007	Analyze next steps and revise subpoena for service on Santaluz Wonderfront LLC (.5) communications with E. Churilla regarding deadline to respond to complaint (.2)	Fates, Edward (Ted)	0.70	481.95	5,352.75	WO	HD	TR	_____
01/31/23	9102002	Call with E. Churilla re: potential resolution of Illa Designs collection action (.5) advise Receiver re: same and next steps re: potential settlement (.9) advise on service issues for subpoena to Santaluz Wonderfront (.3)	Fates, Edward (Ted)	1.70	1,170.45	6,523.20	WO	HD	TR	_____
01/31/23	9104063	Research regarding service of Santaluz Wonderfront, LLC and review and respond to related emails.	Kaup, John	0.50	168.75	6,691.95	WO	HD	TR	_____
02/01/23	9107309	Analyze issues and discuss strategy for settlement proposal to Churillas with Receiver and G. Rodriguez (.5) settlement communications with E. Churilla (.9) revisions to joint motion to extend deadline to respond to complaint (.3)	Fates, Edward (Ted)	1.70	1,170.45	7,862.40	WO	HD	TR	_____

09/29/23 15:58:29 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	
02/01/23	9107316	Research and forward information regarding James Langley for service of subpoena.	Kaup, John	0.50	168.75	8,031.15	WO	HD	TR
02/02/23	9116085	Work on draft settlement agreement and stipulated judgment for Illa Designs and Churillas matter (2.2) discuss same with Receiver (.3) advise on services issues relating to Santaluz Wonderfront (.3) advise on issues relating to Deed of Trust for Churillas settlement (.4) communications with E. Churilla re: stipulation to extend response deadline (.4)	Fates, Edward (Ted)	3.60	2,478.60	10,509.75	WO	HD	TR
02/06/23	9109632	Address issues re: service of subpoena on registered agent for Santaluz Wonderfront (.3) revisions to settlement agreement and stipulated judgment for Churillas (.5) communications with Churillas re: same and order extending deadline to respond to complaint (.4)	Fates, Edward (Ted)	1.20	826.20	11,335.95	WO	HD	TR
02/06/23	9123730	Review and respond to emails regarding service of subpoena on agent for service of process.	Kaup, John	0.20	67.50	11,403.45	WO	HD	TR
02/10/23	9114163	Further communications with managers for Santaluz Wonderfront and Wonderlust Events regarding financial records relating to ANI investment (.4) review and discuss same with Receiver (.5)	Fates, Edward (Ted)	0.90	619.65	12,023.10	WO	HD	TR
02/13/23	9135200	Analyze financial records from Santaluz Wonderfront and discuss same with Receiver (.4) communications with manager	Fates, Edward (Ted)	0.90	619.65	12,642.75	WO	HD	TR

09/29/23 15:58:29 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 for Santaluz Wonderfront (.2) communications with G. Rodriguez re: same (.3)	Timekeeper	Hours	Fees	Sum	Circle Action			
02/14/23	9135166	Analyze and advise Receiver on next steps re: Wonderfront investment, communications with managers for Santaluz Wonderfront and Wonderlust Events re: financial records and potential buyout of membership interest (1.1).	Fates, Edward (Ted)	1.10	757.35	13,400.10	WO	HD	TR	_____
02/15/23	9132787	Analyze emails and documents provided by former manager for Santaluz Wonderfront (.5) discuss same with Receiver (.3).	Fates, Edward (Ted)	0.80	550.80	13,950.90	WO	HD	TR	_____
02/22/23	9134291	Analysis and determination of responsive documents in preparation for attorney review.	Peng, Simona	0.80	270.00	14,220.90	WO	HD	TR	_____
02/24/23	9134332	Analysis and determination of responsive documents in preparation for attorney review.	Peng, Simona	0.30	101.25	14,322.15	WO	HD	TR	_____
02/28/23	9131092	Communications with manager for Wonderlust Events regarding financial records	Fates, Edward (Ted)	0.20	137.70	14,459.85	WO	HD	TR	_____
03/02/23	9161306	Analysis and determination of responsive documents in preparation for attorney review.	Peng, Simona	0.30	101.25	14,561.10	WO	HD	TR	_____
03/05/23	9161348	Analysis and determination of responsive documents in preparation for attorney review.	Peng, Simona	0.50	168.75	14,729.85	WO	HD	TR	_____

09/29/23 15:58:29 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	
03/06/23	9161353	Analysis and determination of responsive documents in preparation for attorney review.	Peng, Simona	0.50	168.75	14,898.60	WO	HD	TR
03/07/23	9143342	Communications with Manager for Wonderlust Events re: production of financial documents	Fates, Edward (Ted)	0.20	137.70	15,036.30	WO	HD	TR
03/10/23	9158967	Communications with manager for Wonderlust Events (.2) review capitalization table and discuss same with Receiver (.3)	Fates, Edward (Ted)	0.50	344.25	15,380.55	WO	HD	TR
03/14/23	9149052	Discuss next steps for monetizing Santaluz Wonderfront LLC membership interest with Receiver and G. Rodriguez	Fates, Edward (Ted)	0.20	137.70	15,518.25	WO	HD	TR
03/17/23	9153034	Discuss strategy and plan for potential sale of ANI membership units in Santaluz Wonderfront with Receiver and G. Rodriguez	Fates, Edward (Ted)	0.50	344.25	15,862.50	WO	HD	TR
03/21/23	9156227	Communications with G. Rodriguez re: issues relating to potential sale of units in Santaluz Wonderfront	Fates, Edward (Ted)	0.30	206.55	16,069.05	WO	HD	TR
03/24/23	9160025	Communications with manager for Wonderlust Events regarding interest in selling membership units	Fates, Edward (Ted)	0.20	137.70	16,206.75	WO	HD	TR
03/28/23	9166949	Communications with G. Rodriguez and managers of Santaluz Wonderfront and Wonderlust Events	Fates, Edward (Ted)	0.30	206.55	16,413.30	WO	HD	TR
03/30/23	9167169	Communications with G. Rodriguez re: Wonderfront issues	Fates, Edward (Ted)	0.10	68.85	16,482.15	WO	HD	TR

09/29/23 15:58:29 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			
04/04/23	9175828	Discuss status re: Santaluz Wonderlust and communications with manager with G. Rodriguez	Fates, Edward (Ted)	0.20	137.70	16,619.85	WO	HD	TR	_____
04/26/23	9198292	Analysis and determination of responsive documents in preparation for attorney review.	Peng, Simona	0.30	101.25	16,721.10	WO	HD	TR	_____
05/12/23	9227276	Analysis and determination of responsive documents in preparation for attorney review.	Peng, Simona	2.00	675.00	17,396.10	WO	HD	TR	_____
05/16/23	9227535	Analysis and determination of responsive documents in preparation for attorney review.	Peng, Simona	1.50	506.25	17,902.35	WO	HD	TR	_____
05/18/23	9227595	Analysis and determination of responsive documents in preparation for attorney review.	Peng, Simona	0.20	67.50	17,969.85	WO	HD	TR	_____

Proforma Summary

Timekeeper				
Number	Timekeeper	Hours	Rate	Amounts
000820	Kaup, John	1.20	337.50	405.00
001665	Fates, Edward (Ted)	21.10	688.50	14,527.35
002307	Peng, Simona	9.00	337.50	3,037.50
		<u>31.30</u>		<u>\$17,969.85</u>
Subtotal Fees				\$17,969.85
Discount				0.00
Total Fees				17,969.85
Total Disbursements				0.00

Attorney Billing Instructions

() BILL ALL

() Hold

09/29/23 15:58:29 PROFORMA STATEMENT FOR MATTER 378827.00003 (Krista Freitag, as Receiver for ANI Deve) (SEC v. Champion-Cain - Asset Investigati)

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

Billing Instructions

expires 6/30/2024: 10% off standard rates (automatic); no text editing; copies @ .10

Account Summary – As Of 09/29/23

	Fiscal YTD			Calendar YTD			LTD		
	Total	Fees	Disb.	Total	Fees	Disb.	Total	Fees	Disbursements
Worked	5,953.50	5,953.50	0.00	23,923.35	23,923.35	0.00	462,645.25	453,516.75	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	42,064.20	42,064.20	0.00	425,322.27	425,322.27	9,128.50
Collected	0.00	0.00	0.00	42,064.20	42,064.20	0.00	434,450.77	425,322.27	9,128.50
AR Write Off	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00
WIP Balance	24,307.24	23,923.35	383.89						
AR Balance	0.00	0.00	0.00						
Unalloc Payment	0.00								
Client Trust Balance	0.00								

Billing Address

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

09/29/23 15:58:30 PROFORMA STATEMENT FOR MATTER 378827.00004 (Krista Freitag, as Receiver for ANI Deve) (SEC v. Champion-Cain - Reporting)

Preliminary Billing Form

Billing Atty: 001665 - Fates, Edward (Ted) Matter #: 378827.00004 Client Name: Krista Freitag, as Receiver for ANI Deve
 Date of Last Billing: 04/27/23 Matter Name: SEC v. Champion-Cain - Reporting
 Proforma Number: 1235483
 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	
03/03/23	9140829	Work on revisions to Receiver's 14th interim report (1.4) discuss same with Receiver (.2)	Fates, Edward (Ted)	1.60	1,101.60	1,101.60	WO	HD	TR
03/06/23	9141487	Meet and confer communications with SEC counsel re: Receiver's 14th interim report	Fates, Edward (Ted)	0.20	137.70	1,239.30	WO	HD	TR
03/10/23	9146664	Meet and confer with SEC counsel regarding 14th interim report (.1) discuss with Receiver and finalize same (.3)	Fates, Edward (Ted)	0.40	275.40	1,514.70	WO	HD	TR
05/09/23	9211693	Work on Receiver's 15th interim report and exhibits thereto (1.7) discuss same with Receiver (.2)	Fates, Edward (Ted)	1.90	1,308.15	2,822.85	WO	HD	TR
05/10/23	9212268	Revisions to Receiver's 15th interim report (.4) discuss same with Receiver (.1) meet and confer communications with SEC counsel (.2)	Fates, Edward (Ted)	0.70	481.95	3,304.80	WO	HD	TR
05/25/23	9227445	Update and finalize Receiver's 15th interim report	Fates, Edward (Ted)	0.20	137.70	3,442.50	WO	HD	TR

09/29/23 15:58:30 PROFORMA STATEMENT FOR MATTER 378827.00004 (Krista Freitag, as Receiver for ANI Deve) (SEC v. Champion-Cain - Reporting)

Proforma Summary**Timekeeper**

Number	Timekeeper	Hours	Rate	Amounts
001665	Fates, Edward (Ted)	5.00	688.50	3,442.50
		5.00		\$3,442.50
Subtotal Fees				\$3,442.50
Discount				0.00
Total Fees				3,442.50
Total Disbursements				0.00

Attorney Billing Instructions

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

Billing Instructions

expires 6/30/2024: 10% off standard rates (automatic); no text editing; copies @ .10

Account Summary – As Of 09/29/23

	Fiscal YTD			Calendar YTD			LTD		
	Total	Fees	Disb.	Total	Fees	Disb.	Total	Fees	Disbursements
Worked	965.25	965.25	0.00	4,407.75	4,407.75	0.00	83,578.05	83,578.05	0.00
Unbilled Adj	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00
Billed	0.00	0.00	0.00	11,420.10	11,420.10	0.00	79,170.30	79,170.30	0.00
Collected	0.00	0.00	0.00	11,420.10	11,420.10	0.00	79,170.30	79,170.30	0.00
AR Write Off	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00
WIP	4,407.75	4,407.75	0.00						
Balance									
AR Balance	0.00	0.00	0.00						
Unalloc	0.00								
Payment									
Client Trust	0.00								
Balance									

09/29/23 15:58:30 PROFORMA STATEMENT FOR MATTER 378827.00004 (Krista Freitag, as Receiver for ANI Deve) (SEC v. Champion-Cain - Reporting)

Billing Address

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

09/29/23 15:58:31 PROFORMA STATEMENT FOR MATTER 378827.00005 (Krista Freitag, as Receiver for ANI Deve) (SEC v. Champion-Cain - Operations & Asse)

Preliminary Billing Form

Billing Atty: 001665 - Fates, Edward (Ted) Matter #: 378827.00005 Client Name: Krista Freitag, as Receiver for ANI Deve
 Date of Last Billing: 04/27/23 Matter Name: SEC v. Champion-Cain - Operations & Asse
 Proforma Number: 1235483
 Client/Matter Joint Group # 378827-1 Client Matter Number:

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

Trans Date	Index	Description of Service Rendered	Timekeeper	Hours	Fees	Sum	Circle	Action	
05/24/23	9225389	Advise Receiver on issues relating to sale of remaining liquor license from Patio Marketplace	Fates, Edward (Ted)	0.20	137.70	137.70	WO	HD	TR
06/22/23	9255804	Advise Receiver on issues relating to termination of contract to sell liquor license	Fates, Edward (Ted)	0.30	206.55	344.25	WO	HD	TR

Proforma Summary

Timekeeper Number	Timekeeper	Hours	Rate	Amounts
001665	Fates, Edward (Ted)	0.50	688.50	344.25
		0.50		\$344.25
Subtotal Fees				\$344.25
Discount				0.00
Total Fees				344.25
Total Disbursements				0.00

Attorney Billing Instructions

() BILL ALL () Hold
 () BILL FEES ONLY () Write Off

09/29/23 15:58:31 PROFORMA STATEMENT FOR MATTER 378827.00005 (Krista Freitag, as Receiver for ANI Deve) (SEC v. Champion-Cain - Operations & Asse)

() BILL COST ONLY () Transfer All

Billing Instructions

expires 6/30/2024: 10% off standard rates (automatic); no text editing; copies @ .10

Account Summary – As Of 09/29/23

	Fiscal YTD			Calendar YTD			LTD		
	Total	Fees	Disb.	Total	Fees	Disb.	Total	Fees	Disbursements
Worked	0.00	0.00	0.00	344.25	344.25	0.00	743,078.70	743,078.70	0.00
Unbilled Adj	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00
Billed	0.00	0.00	0.00	10,458.45	10,458.45	0.00	742,734.45	742,734.45	0.00
Collected	0.00	0.00	0.00	10,458.45	10,458.45	0.00	742,734.45	742,734.45	0.00
AR Write Off	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00
WIP	639.05	344.25	294.80						
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

09/29/23 15:58:32 PROFORMA STATEMENT FOR MATTER 378827.00006 (Krista Freitag, as Receiver for ANI Deve) (SEC v. Champion-Cain - Claims & Distribu)

Preliminary Billing Form

Billing Atty: 001665 - Fates, Edward (Ted) Matter #: 378827.00006 Client Name: Krista Freitag, as Receiver for ANI Deve
 Date of Last Billing: 04/27/23 Matter Name: SEC v. Champion-Cain - Claims & Distribu
 Proforma Number: 1235483
 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	
01/03/23	9076674	Analysis of issues related to CalPrivate claim, upcoming mediation, all with counsel related to Receiver's options/next steps.	Zaro, David	0.30	268.65	268.65	WO	HD	TR
01/06/23	9088395	Communications with court clerk regarding mediation statement for 1/13 settlement conference with CalPrivate Bank re: disputed claim, appeal, etc. (.3) analyze mediation statement from counsel for CalPrivate Bank (.6) discuss same with Receiver (.4)	Fates, Edward (Ted)	1.30	895.05	1,163.70	WO	HD	TR
01/08/23	9088404	Work on mandatory settlement conference statement (3.7) discuss same with Receiver (.4)	Fates, Edward (Ted)	4.10	2,822.85	3,986.55	WO	HD	TR
01/09/23	9080958	Analysis of CalPrivate mediation brief, assess the legal/fact issues and exhibits (.6). revise the Receiver's draft of Receiver mediation brief, several email communications with Receiver counsel regarding brief and negotiations (.5).	Zaro, David	1.10	985.05	4,971.60	WO	HD	TR

09/29/23 15:58:32 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	
01/09/23	9088414	Revisions to mandatory settlement conference statement (1.3) communications with Receiver re: same (.4)	Fates, Edward (Ted)	1.70	1,170.45	6,142.05	WO	HD	TR
01/13/23	9088427	Prepare for and attend settlement conference regarding CalPrivate's disputed claim, appeal, and related issues	Fates, Edward (Ted)	3.30	2,272.05	8,414.10	WO	HD	TR
01/17/23	9085894	Analyze CalPrivate settlement issues and claims against K. Peterson irrevocable trust (.7) discuss same with Receiver (.4)	Fates, Edward (Ted)	1.10	757.35	9,171.45	WO	HD	TR
01/17/23	9088623	Review the status of the negotiations with CalPrivate, Zinder, Armstrong investor claims and disputes (.4). Call regarding settlement negotiations and mediation with CalPrivate (.3).	Zaro, David	0.70	626.85	9,798.30	WO	HD	TR
01/18/23	9087390	Analyze issues and advise Receiver on settlement counter-offer to CalPrivate and issues relating claims against K. Peterson and strategy (1.1) prepare for and attend conference call with Judge Goddard re: settlement issues and counter-offer (.7)	Fates, Edward (Ted)	1.80	1,239.30	11,037.60	WO	HD	TR
01/19/23	9091934	Review of mediation with CalPrivate related to claims, Peterson action and negotiations.	Zaro, David	0.30	268.65	11,306.25	WO	HD	TR
01/20/23	9089614	Communications with Judge Goddard and Receiver re: CalPrivate settlement issues	Fates, Edward (Ted)	0.30	206.55	11,512.80	WO	HD	TR
01/23/23	9093028	Call with counsel related to the CalPrivate settlement negotiations (.2). Follow-up emails, draft term sheet for settlement of CalPrivate matter (.5).	Zaro, David	0.70	626.85	12,139.65	WO	HD	TR

09/29/23 15:58:32 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		
01/23/23	9104318	Analyze proposed settlement terms with CalPrivate provided by Judge Goddard (.7) discuss same with Receiver (.3) communications with Judge Goddard and law clerk (.3) work on revisions to settlement term sheet (.9) communications with counsel for CalPrivate regarding notice of appeal (.3)	Fates, Edward (Ted)	2.50	1,721.25	13,860.90	WO	HD	TR
01/24/23	9096005	Evaluate the revisions to draft term sheets, assess legal issues, and brief research as to terms (.8). Call/emails with Receivers counsel to address proposed revisions and strategy for proceeding (.6).	Zaro, David	1.40	1,253.70	15,114.60	WO	HD	TR
01/24/23	9104347	Finalize revisions to CalPrivate settlement term sheet (.9) discuss same with Receiver (.6) communications with Judge Goddard re: same (.2)	Fates, Edward (Ted)	1.70	1,170.45	16,285.05	WO	HD	TR
01/25/23	9104360	Prepare for and attend zoom conference with Judge Goddard and Receiver re: CalPrivate settlement terms (.9) further revisions to proposed settlement term sheet (.7) discuss same with Receiver (.4) call/emails with law clerk regarding same (.5)	Fates, Edward (Ted)	2.50	1,721.25	18,006.30	WO	HD	TR
01/26/23	9099415	Work on the analysis of CalPrivate settlement terms, and issues re: assignment including research case cited by the magistrate, email analysis to Receiver.	Zaro, David	0.80	716.40	18,722.70	WO	HD	TR
01/26/23	9104385	Analyze legal issues re: potential settlement with CalPrivate and assignment of claims /	Fates, Edward (Ted)	1.30	895.05	19,617.75	WO	HD	TR

09/29/23 15:58:32 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	
		standing to pursue assigned claims against K. Peterson and related entities (.9) discuss same with Receiver (.4)							
01/27/23	9098439	Telephone call with Mr. Fates regarding potential settlement with CalPrivate Bank; research status of and prepare summary of CalPrivate Bank v. Peterson state court lawsuit	Kaup, John	0.60	202.50	19,820.25	WO	HD	TR
01/27/23	9104389	Analyze status of CalPrivate action against Peterson, Peterson cross-claim against CTC, and related issues in connection with potential CalPrivate settlement and assignment of claim	Fates, Edward (Ted)	0.70	481.95	20,302.20	WO	HD	TR
01/30/23	9104412	Analyze and advise Receiver on issues concerning potential settlement with CalPrivate and assignment of claims against Peterson Trust (.5) communications with Receiver and Judge Goddard re: same (.3)	Fates, Edward (Ted)	0.80	550.80	20,853.00	WO	HD	TR
01/31/23	9102225	Discuss issues relating to potential CalPrivate settlement with Receiver (.3) communications with Judge Goddard re: same (.3)	Fates, Edward (Ted)	0.60	413.10	21,266.10	WO	HD	TR
01/31/23	9106793	Analysis of the CalPrivate Bank settlement issues as to claim, Peterson action stay motion, order and impact on negotiations (.4). Address disputed claims including 2Budz and impact on settlement, distribution and conference with Receiver counsel (.3).	Zaro, David	0.70	626.85	21,892.95	WO	HD	TR

09/29/23 15:58:32 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	
02/01/23	9108286	Analyze and advise Receiver on response to creditor correspondence (.2) assist Receiver in responding to investor inquiries (.2)	Fates, Edward (Ted)	0.40	275.40	22,168.35	WO	HD	TR
02/02/23	9116082	Analyze and advise Receiver on issues relating to death of investor claimant and transfer of claim in receivership to heirs/beneficiaries (.5) communications with Judge Goddard re: CalPrivate settlement issues (.1)	Fates, Edward (Ted)	0.60	413.10	22,581.45	WO	HD	TR
02/03/23	9109699	Communications with Receiver and Judge Goddard regarding CalPrivate settlement issues	Fates, Edward (Ted)	0.90	619.65	23,201.10	WO	HD	TR
02/06/23	9117425	Communications with counsel for CalPrivate regarding potential settlement (.4) communications with Judge Goddard re: same (.3) analyze and advise Receiver on settlement issues and potential assignment of claims against Peterson (.6)	Fates, Edward (Ted)	1.30	895.05	24,096.15	WO	HD	TR
02/07/23	9112313	Evaluate the new proposal from CalPrivate, assess legal issues/risk and strategy, follow-up with counsel (.4). Research/analysis of the indemnity claims, stay of prospective amended complaint and conference with counsel (.3).	Zaro, David	0.70	626.85	24,723.00	WO	HD	TR
02/08/23	9118406	Communications with Receiver and Judge Goddard regarding terms of potential CalPrivate settlement	Fates, Edward (Ted)	0.70	481.95	25,204.95	WO	HD	TR
02/09/23	9113278	Analyze and discuss terms for potential CalPrivate settlement with Receiver (.9)	Fates, Edward (Ted)	1.70	1,170.45	26,375.40	WO	HD	TR

09/29/23 15:58:32 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			
		call/emails with Judge Goddard re: same (.8)								
02/10/23	9114928	Discuss CalPrivate settlement issues and draft of mediator's proposal with Receiver (1.3) communications with Judge Goddard re: same (.6)	Fates, Edward (Ted)	1.90	1,308.15	27,683.55	WO	HD	TR	_____
02/13/23	9115604	Work on proposed changes to Judge Goddard mediator's proposal (.8) discuss same with Receiver (.5) communications with Judge Goddard re: same (.3)	Fates, Edward (Ted)	1.60	1,101.60	28,785.15	WO	HD	TR	_____
02/14/23	9119840	Several emails, analysis of Judge Goddard's proposal, assess Receiver response (.4). Analysis of CalPrivate email as to the settlement, impact of case law, follow-up (.5). Call with Receiver counsel to address the settlement proposal, new case, next steps, Receiver response (.4).	Zaro, David	1.30	1,164.15	29,949.30	WO	HD	TR	_____
02/14/23	9135182	Communications with counsel for CalPrivate re: potential settlement and related issues (.6) analyze recent 6th Cir. decision on settlement bar orders in receiverships (1.4) discuss same and settlement strategy with Receiver and counsel (.7)	Fates, Edward (Ted)	2.70	1,858.95	31,808.25	WO	HD	TR	_____
02/15/23	9118886	Analyze final mediator's proposal from Judge Goddard regarding CalPrivate claim dispute and appeal, assignment of claims against Peterson (.7) discuss same with Receiver (.5)	Fates, Edward (Ted)	1.20	826.20	32,634.45	WO	HD	TR	_____

09/29/23 15:58:32 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	
02/15/23	9119868	Several emails with counsel concerning the mediator proposal as to CalPrivate and follow-up.	Zaro, David	0.40	358.20	32,992.65	WO	HD	TR
02/16/23	9120819	Evaluate/analysis of the CalPrivate mediator proposal/agreement (.4). Follow-up on the settlement offer and the call with counsel to address Receiver's response (.3).	Zaro, David	0.70	626.85	33,619.50	WO	HD	TR
02/16/23	9135151	Communications with Receiver and Judge Goddard re: mediator's proposal	Fates, Edward (Ted)	0.70	481.95	34,101.45	WO	HD	TR
02/17/23	9122791	Advise on issues relating to CalPrivate settlement and strategy regarding mediator's proposal, next steps	Fates, Edward (Ted)	0.30	206.55	34,308.00	WO	HD	TR
02/17/23	9123035	Email/evaluate the prior mediator communications and proposal (.8). Call with Mr. Yoder related to CalPrivate/negotiations (.3). Call with Ms. Freitag related to the negotiations and CalPrivate (.4). Call with counsel/Receiver and email response to CalPrivate (.7).	Zaro, David	2.20	1,970.10	36,278.10	WO	HD	TR
02/21/23	9122962	Meet and confer communications with SEC counsel regarding CalPrivate settlement and joint motion re: same (.2) communications with counsel for CalPrivate re: settlement and joint motion for approval (.3) work on joint motion and supporting declaration (2.6)	Fates, Edward (Ted)	3.10	2,134.35	38,412.45	WO	HD	TR
02/21/23	9126090	Evaluate/review the Court/magistrate order/response, email concerning the CalPrivate settlement and email with	Zaro, David	1.10	985.05	39,397.50	WO	HD	TR

09/29/23 15:58:32 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 related to joint motion (.6). Call/email with counsel related to next steps as to assignment of claims and form of order and assignment (.5).							
02/22/23	9124420	Communications with counsel for CalPrivate and counsel for Chicago Title regarding Receiver/CalPrivate settlement and temporary stay of CalPrivate appeal pending court approval of settlement (1.3) analyze draft motion for temporary stay (.4) communications with law clerk regarding consent to jurisdiction form and joint motion (.8) discuss consent form and joint motion with Receiver (.9) work on revisions to same (1.7) work on supporting declaration from Receiver and proposed order (.8)	Fates, Edward (Ted)	5.90	4,062.15	43,459.65	WO	HD	TR
02/22/23	9130141	Call and work with counsel on the joint motion for approval of the settlement (.3). Email/call concerning the consent to magistrate's/joint motion (.4). Evaluate the draft of the consent to jurisdiction, follow-up thereon as to revisions (.5). Further revisions to the draft joint motion and follow-up (.7).	Zaro, David	1.90	1,701.45	45,161.10	WO	HD	TR
02/23/23	9125965	Communications with counsel for CalPrivate re: settlement terms, joint motion for approval, and consent form (1.1) discuss same with Receiver (.3)	Fates, Edward (Ted)	1.40	963.90	46,125.00	WO	HD	TR
02/23/23	9132182	Draft/review of the revisions to joint motion in support of the CalPrivate Bank settlement, follow-up with counsel.	Zaro, David	0.50	447.75	46,572.75	WO	HD	TR

09/29/23 15:58:32 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			
02/24/23	9127140	Analyze proposed changes to Joint Motion from counsel for CalPrivate (.3) communications with counsel for CalPrivate re: same (.4) communications with Judge Goddard chambers re: same (.1) communications with Receiver regarding declaration in support of joint motion (.3) finalize joint motion, declaration, and proposed order (.3) analyze order on claims and distribution plan (.6) advise Receiver re: same (.3)	Fates, Edward (Ted)	2.30	1,583.55	48,156.30	WO	HD	TR	_____
02/24/23	9132233	Follow-up on the joint stipulation and order related to the CalPrivate settlement, address declaration.	Zaro, David	0.40	358.20	48,514.50	WO	HD	TR	_____
02/27/23	9132257	Follow-up with Receiver and call with Receiver's counsel as to distribution plan, next steps and reserves.	Zaro, David	0.40	358.20	48,872.70	WO	HD	TR	_____
02/27/23	9132265	Further review/analysis of the court's order as to Receiver's claims allowance/disallowance motion, follow-up with counsel (.9). Call as to the 2Budz ruling and next sttpeps (.2).	Zaro, David	1.10	985.05	49,857.75	WO	HD	TR	_____
02/27/23	9135274	Communications with counsel for CalPrivate re: transmission of litigation file documents for action against Peterson Trust (.4) analyze and advise Receiver on issues relating to timing and process for making interim distribution (.4) communications with counsel for Wakefield Parties re: 2Budz claim, fraudulent transfer action, and related issues (.5) advise Receiver on service issues for CalPrivate	Fates, Edward (Ted)	1.70	1,170.45	51,028.20	WO	HD	TR	_____

09/29/23 15:58:32 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	
		motion / hearing and on case update for receivership website (.4)							
02/28/23	9131071	Communications with counsel for CalPrivate regarding transfer of litigation file, form of consent to magistrate judge for resolution of settlement issues (.7) communications with law clerk for Judge Goddard regarding consent form (.4)	Fates, Edward (Ted)	1.10	757.35	51,785.55	WO	HD	TR
02/28/23	9132750	Evaluate the records from CalPrivate as to Peterson action, due diligence related to CalPrivate settlement.	Zaro, David	1.40	1,253.70	53,039.25	WO	HD	TR
03/01/23	9139146	Follow-up/further evaluate the CalPrivate settlement issues, turnover of records, call and emails with Receiver, counsel and CalPrivate.	Zaro, David	0.60	537.30	53,576.55	WO	HD	TR
03/01/23	9154995	Analyze issues concerning production of litigation documents by CalPrivate pursuant to pending settlement (.4) communications with counsel for CalPrivate re: same (.3) analyze legal issues relating to CalPrivate prospective dismissal of pending claims against Peterson Trust without prejudice (.7)	Fates, Edward (Ted)	1.40	963.90	54,540.45	WO	HD	TR
03/02/23	9154997	Discuss reserve calculation and rising tide distribution issues with Receiver (.6) communications with counsel for Wakefield investors re: 2Budz claim issues (.3)	Fates, Edward (Ted)	0.90	619.65	55,160.10	WO	HD	TR
03/03/23	9139838	Communications with counsel for CalPrivate regarding issues relating to pending settlement and production of	Fates, Edward (Ted)	0.70	481.95	55,642.05	WO	HD	TR

09/29/23 15:58:32 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)

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		litigation file								
03/03/23	9143420	Follow-up emails with counsel related to the settlement with CalPrivate and issues re: assignment of claims, impact of dismissal (.5). Research/analysis of standing, jurisdiction and civil procedure issues as to dismissal and refiling of actions (1.3).	Zaro, David	1.80	1,611.90	57,253.95	WO	HD	TR	_____
03/06/23	9143457	Conference with counsel related to the jurisdiction/research as to dismissals, re-filing of lawsuit and email related to Peterson objection.	Zaro, David	0.40	358.20	57,612.15	WO	HD	TR	_____
03/06/23	9158943	Call/emails with counsel for 2Budz regarding waiver of right to appeal order on claims, transfer of membership units, dismissal of clawback action, and related issues (.6) analyze Peterson objection to joint motion regarding CalPrivate settlement (.8) advise Receiver re: same (.3)	Fates, Edward (Ted)	1.70	1,170.45	58,782.60	WO	HD	TR	_____
03/07/23	9145395	Evaluate the opposition to the CalPrivate settlement filed by Peterson and Receiver joint reply (.6). Calls with Receiver and counsel as to the opposition and joint reply.	Zaro, David	1.10	985.05	59,767.65	WO	HD	TR	_____
03/07/23	9158948	Communications with counsel for CalPrivate regarding Peterson objection to settlement approval motion (.4) work on joint reply brief for same (2.8) communications with counsel for CalPrivate Bank re: production of litigation documents (.2)	Fates, Edward (Ted)	3.40	2,340.90	62,108.55	WO	HD	TR	_____

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03/08/23	9146698	Emails concerning the objection by Peterson to the Receiver's motion to approve settlement (.3). Evaluate the objection and draft of joint reply of Receiver, follow-up thereon with response to Receiver counsel (.8).	Zaro, David	1.10	985.05	63,093.60	WO	HD	TR	
03/08/23	9158955	Work on revisions to joint reply brief for CalPrivate settlement motion (.9) discuss same with Receiver (.4) communications with counsel for CalPrivate (.3) discuss interim distribution issues and reserve calculation with Receiver (.3)	Fates, Edward (Ted)	1.90	1,308.15	64,401.75	WO	HD	TR	
03/09/23	9146780	Analysis of the CalPrivate complaint against Peterson and issues related to assignment of claims and impact on settlement (.7). Several emails with counsel related to joint motion to approve settlement (.4).	Zaro, David	1.10	985.05	65,386.80	WO	HD	TR	
03/09/23	9158961	Calls/emails with counsel for CalPrivate re: separate action against Peterson and potential dismissal of same, strategy for joint reply brief, remaining document production for assigned claims (.9) work on draft agreements with 2Budz and Wakefield Parties regarding transfer of ANI membership units in 2Budz and waiver of appeal rights (1.9) discuss same with Receiver (.4) discuss revisions to draft joint reply brief with Receiver (.3) work on same (.4) analyze issues regarding separate CalPrivate action against Peterson (.4) communications with counsel for 2Budz and Wakefield (.3)	Fates, Edward (Ted)	4.60	3,167.10	68,553.90	WO	HD	TR	

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03/10/23	9148170	Analysis of CalPrivate's second complaint as to Peterson on its claim, assess assignment issues (.3). Call with Receiver counsel concerning the pending CalPrivate actions, Peterson objections/appeals, related issues and Receiver's strategy (.4).	Zaro, David	0.70	626.85	69,180.75	WO	HD	TR
03/10/23	9158966	Work on revisions to transfer/waiver agreement, assignment of 2Budz membership units, and covenant not to appeal (.9) discuss same with Receiver (.4) communications with counsel for 2Budz and Wakefield re: same (.4) analyze claims in CalPrivate separate state court action against Peterson personally and strategy for same (.8) analyze issues and strategy for Peterson anticipated appeal of claims order and motion for stay of distributions pending appeal (.4) communications with counsel for CalPrivate (.3)	Fates, Edward (Ted)	3.20	2,203.20	71,383.95	WO	HD	TR
03/13/23	9147838	Communications with counsel for 2Budz and Wakefield parties regarding execution of transfer agreement and covenant not to appeal (.3) discuss same with Receiver (.2) communications with counsel for CalPrivate re: joint reply brief and revisions to same (.5) work on revisions and discuss same with Receiver (.4) respond to call from investor re: distributions (.4) analyze issues raised by notice of appeal of claims order and motion for stay pending appeal by K. Peterson (1.6) advise Receiver re: same and interim distribution issues (.5)	Fates, Edward (Ted)	3.90	2,685.15	74,069.10	WO	HD	TR

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03/13/23	9149319	Analysis of the issues concerning the appeal, objections of creditor/claimant Peterson and follow-up with counsel (.8). Research/analysis of the issues and evaluate the Peterson motion to stay distribution to investors (.8). Calls with counsel, follow-up on the research and strategy for Receiver (.6).	Zaro, David	2.20	1,970.10	76,039.20	WO	HD	TR	
03/14/23	9149270	Research whether Peterson's motion to stay pending appeal acts as an interim stay with respect to planned distribution of Estate Funds (1.5); draft email to T. Fates stating determinations regarding same (.4); begin researching legal standard for disposition of motion for stay pending appeal (.8); first draft of legal standard for same (.6).	Robichaud, James	3.30	1,143.45	77,182.65	WO	HD	TR	
03/14/23	9150435	Evaluate the legal issues concerning the stay pending appeal as to distribution/claims and assess the Receiver's response to motion and approach to distribution and litigation (.8). Call with counsel related to strategy for the distribution/impact of motion, and strategy for proceeding with assigned litigation claims (.5).	Zaro, David	1.30	1,164.15	78,346.80	WO	HD	TR	
03/14/23	9160041	Analyze issues relating to Peterson motion for stay of distributions pending appeal and timing of distributions to 2Budz and Wakefield parties (.8) discuss same with Receiver (.3) initial work on opposition to Peterson motion for stay of distributions pending appeal (.7) communications with	Fates, Edward (Ted)	2.10	1,445.85	79,792.65	WO	HD	TR	

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		counsel for Wakefield parties regarding wire transfers (.3)							
03/15/23	9150372	Review order taking 3/20 hearing off calendar and advise Receiver re: same (.2) communications with Receiver and counsel for Wakefield parties regarding issues relating to wire transfer distributions (.5) work on opposition to Peterson motion for stay of distributions pending appeal (3.4)	Fates, Edward (Ted)	4.10	2,822.85	82,615.50	WO	HD	TR _____
03/15/23	9150692	Complete first draft of legal standard for opp to K. Peterson's motion for stay of distribution pending appeal (1).	Robichaud, James	1.00	346.50	82,962.00	WO	HD	TR _____
03/15/23	9152711	Evaluate court order/email and calls with counsel and Receiver related to the CalPrivate settlement/Peterson (.3). Call/email related to distributions/follow-up (.3).	Zaro, David	0.60	537.30	83,499.30	WO	HD	TR _____
03/16/23	9152129	Research case law pertaining to approval of motion to stay, especially in context of receiverships (1.6).	Robichaud, James	1.60	554.40	84,053.70	WO	HD	TR _____
03/16/23	9160063	Work on opposition to Peterson motion for stay of distributions pending appeal (2.2) call from investor regarding Peterson motion to stay distributions (.5)	Fates, Edward (Ted)	2.70	1,858.95	85,912.65	WO	HD	TR _____
03/17/23	9152580	Communications with counsel for Peterson regarding pending appeals, potential consolidation, and request to extend briefing schedule (.4) analyze issues and discuss same with Receiver (.8) communications with counsel for CTC (.4)	Fates, Edward (Ted)	1.60	1,101.60	87,014.25	WO	HD	TR _____

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03/17/23	9152775	Consult with J. Robichaud regarding pending motion to stay claims order pending appeal and review and assemble pleadings for use in connection with anticipated opposition (0.8).	Del Castillo, Joshua	0.80	550.80	87,565.05	WO	HD	TR	_____
03/17/23	9152929	Research case law pertaining to approval of motion to stay, especially in context of receiverships (1.5).	Robichaud, James	1.50	519.75	88,084.80	WO	HD	TR	_____
03/17/23	9156351	Several emails/call with Receiver counsel related to proposed consolidation of appeals, review appellate issue.	Zaro, David	0.40	358.20	88,443.00	WO	HD	TR	_____
03/17/23	9157781	Complete draft of language concerning relevant case law and insert into latest draft (1.1); initial research concerning a court's imposition of a bond in cases where appellant moves for stay of money judgment pending appeal (1); communicate with T. Fates regarding same (.1).	Robichaud, James	2.20	762.30	89,205.30	WO	HD	TR	_____
03/20/23	9156370	Several emails, conference all and analysis of the proposal from Peterson to consolidate appeal from claims order, settlement with CTC order, settlement bar and follow-up analysis/advice (.5). Evaluate the research related to the stay motion (.3). Evaluate appellate court notice/scheduling (.3).	Zaro, David	1.10	985.05	90,190.35	WO	HD	TR	_____
03/20/23	9156481	Analyze strategy and next steps for Peterson appeal of claims order, motion for stay pending appeal, and request to consolidate appeals (.4) discuss same with	Fates, Edward (Ted)	3.20	2,203.20	92,393.55	WO	HD	TR	_____

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		Receiver (.2) work on opposition to motion for stay of distributions (.9) discuss email from investor re: same with Receiver (.2) calls/emails with counsel for CTC re: appeal issues, briefing schedule, and Peterson request for consolidation (.9) advise Receiver re: same (.2) analyze time schedule order for Peterson appeal and advise Receiver re: same (.2)								
03/21/23	9158947	Follow-up on the notices from Ninth Circuit Court of Appeals, conference with counsel and Receiver concerning Peterson litigation (.4). Email with counsel related to Peterson appeal (.3).	Zaro, David	0.70	626.85	93,020.40	WO	HD	TR	_____
03/21/23	9160434	Complete drafting of sections stating relevant law regarding stay and insert language into T. Fates' latest draft of brief (3.1).	Robichaud, James	3.10	1,074.15	94,094.55	WO	HD	TR	_____
03/21/23	9165299	Advise Receiver re: notice of allowed claim adjustments and procedure for same (.4) work on opposition to Peterson motion to stay distributions and for reserve (2.3) communications with counsel for CTC, counsel for Peterson, and counsel for Nossaman regarding pending appeals, request for consolidation, and briefing schedule (.8)	Fates, Edward (Ted)	3.50	2,409.75	96,504.30	WO	HD	TR	_____
03/22/23	9157505	Work on opposition to Peterson motion to stay distributions pending appeal of claims order, analyze legal issues for same (2.4) communications with Receiver and counsel for CTC re: CTC settlement payments and	Fates, Edward (Ted)	2.70	1,858.95	98,363.25	WO	HD	TR	_____

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		1099 tax statements (.3)							
03/22/23	9160437	Complete research regarding imposition of bond on appellant seeking stay of money judgment (.6); draft memo regarding same to T. Fates (.4).	Robichaud, James	1.00	346.50	98,709.75	WO	HD	TR _____
03/23/23	9162550	Review/evaluate and revise the draft of the Receiver's opposition to the Peterson motion for stay pending appeal, follow-up (1.4). Call with counsel to address revisions and issues concerning stay motion (.4).	Zaro, David	1.80	1,611.90	100,321.65	WO	HD	TR _____
03/23/23	9165308	Work on opposition to Peterson motion for stay pending appeal (1.8) discuss same with Receiver (.3) discuss opposition to motion for stay pending appeal and issues re: pending settlement with counsel for CalPrivate (.5)	Fates, Edward (Ted)	2.60	1,790.10	102,111.75	WO	HD	TR _____
03/24/23	9165310	Discuss legal issues relating to rising tide distribution model, calculations and reserve with Receiver (.7) work on revisions to opposition to Peterson motion for stay pending appeal (1.2) discuss same with Receiver (.5) work on draft declaration in support of opposition (.7) review email exhibits and discuss same with Receiver (.4) analyze investor communication and assist Receiver in addressing same (.3) communications with counsel for CalPrivate Bank (.3)	Fates, Edward (Ted)	4.10	2,822.85	104,934.60	WO	HD	TR _____
03/27/23	9165403	Call with counsel for CalPrivate Bank regarding opposition to Peterson stay	Fates, Edward (Ted)	3.70	2,547.45	107,482.05	WO	HD	TR _____

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		motion (.6) revisions to opposition brief (.5) discuss same and Rising Tide distribution issues with Receiver (.5) finalize opposition brief and supporting declaration (.4) analyze Peterson mediation statement in appeal of claims and distribution order (.2) work on notice of interim distribution (.8) work on notice of allowed claim adjustments (.7)							
03/27/23	9173587	Several emails/call with Receiver's counsel related to final edits and Receiver's final draft of Receiver's Motion for Stay pending appeal/review the filing (.4)	Zaro, David	0.40	358.20	107,840.25	WO	HD	TR
03/28/23	9173717	Follow up on the appellate notices and filings/mediation statements and asses the Receiver's responses (.3). Call with counsel related to the CTC appeal and follow-up to review Peterson requests for Receiver response/impact on distribution/case (.4).	Zaro, David	0.70	626.85	108,467.10	WO	HD	TR
03/31/23	9173578	Several emails related to the appeals, stay motions and status, timing of the appeals.	Zaro, David	0.20	179.10	108,646.20	WO	HD	TR
04/03/23	9177558	Evaluate the filings by Peterson, reply brief on the stay motion and follow-up.	Zaro, David	0.70	626.85	109,273.05	WO	HD	TR
04/03/23	9197032	Emails/call with Receiver regarding notice of interim distribution and notice of allowed claim adjustments (.5) work on same (.3) respond to inquiry from counsel for investor regarding distributions (.3) discuss same with Receiver (.1) analyze reply brief filed by K. Peterson re: motion for stay of distributions pending appeal (.8) advise	Fates, Edward (Ted)	2.40	1,652.40	110,925.45	WO	HD	TR

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		Receiver re: same and strategy for 4/10 hearing (.4)							
04/04/23	9177570	Evaluate issues, research the issues and case law cited in reply brief on stay motion (.6). Call with Receiver counsel related to strategy as to oral argument and related issues (.3). Evaluate filing by Peterson as to counsel, appearances, briefs and email with Receiver counsel (.3). Review order concerning oral argument (.2).	Zaro, David	1.40	1,253.70	112,179.15	WO	HD	TR
04/04/23	9196366	Analyze and discuss rising tide distribution calculations, CTC participation right issues, notice of interim distribution, and related issues with Receiver (.9) analyze order from appellate mediator (.2) communications with appellate mediator regarding Peterson appeal of claims and distribution order and settlement issues (.6) discuss notice of allowed claim adjustments and schedule for same with Receiver (.8) work on revisions to same (.5) prepare communication to counsel for CTC regarding adjustments and participation right issues (.8) advise Receiver re: oral argument on Peterson stay motion set for 4/10 (.3)	Fates, Edward (Ted)	3.80	2,616.30	114,795.45	WO	HD	TR
04/05/23	9196915	Work on revisions to Notice of Allowed Claim Adjustments and exhibit thereto (.8) discuss same with Receiver (.5) work on revisions to Notice of Interim Distribution (.7) discuss same and communication to counsel for CTC regarding participation right and adjustments to claims with Receiver (.9) finalize communications to	Fates, Edward (Ted)	5.40	3,717.90	118,513.35	WO	HD	TR

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		counsel for CTC (.4) prepare draft email blast to investors regarding notice of interim distributions (.3) analyze and advise Receiver on response to investor inquiry re: splitting distribution (.4) assist in preparing response to same (.3) analyze and advise Receiver regarding final Rising Tide distribution calculations (.7) assist with revisions to exhibit to notice of interim distribution (.4)								
04/07/23	9180167	Evaluate the response of CalPrivate to stay, call with Receiver counsel as to CalPrivate issues and settlement (.3). Assess approach to the oral argument and call with Receiver counsel as to strategy/argument (.4).	Zaro, David	0.70	626.85	119,140.20	WO	HD	TR	_____
04/07/23	9196913	Call/emails with counsel for CalPrivate Bank regarding 4/10 hearing on Peterson motion for stay pending appeal (.6) analyze issues and prepare for 4/10 oral argument (.9) address investor communications concerning distributions, discuss same with A. Herren (.4) communications with counsel for CTC re: claim adjustments and participation right (.4)	Fates, Edward (Ted)	2.30	1,583.55	120,723.75	WO	HD	TR	_____
04/10/23	9179747	Analyze issues and prepare arguments for hearing on Peterson motion for stay pending appeal (1.4) discuss same with Receiver (.4) attend hearing on motion (1.6) discuss plan and next steps with Receiver in light of court ruling (.4) work on revisions to notice of interim distribution (.4) discuss same with Receiver (.3) review court's order	Fates, Edward (Ted)	4.70	3,235.95	123,959.70	WO	HD	TR	_____

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04/10/23	9181500	Regarding ABC/Peterson motion for stay, call with Receiver related to the oral argument and Receiver's strategy (.3). Follow-up on hearing regarding stay motion, insider issues and the court of appeals stay (.5).	Zaro, David	0.80	716.40	124,676.10	WO	HD	TR _____
04/11/23	9182581	Follow-up with counsel and emails concerning the noticed to claimants/appeal and stay order.	Zaro, David	0.30	268.65	124,944.75	WO	HD	TR _____
04/11/23	9196919	Finalize notice of interim distribution and exhibits (.4) advise Receiver on email blast for notice of interim distribution (.2) analyze and discuss issues and strategy regarding Peterson motion for stay to Ninth Circuit with Receiver (.6) respond to investor inquiry regarding timing of distributions (.2)	Fates, Edward (Ted)	1.40	963.90	125,908.65	WO	HD	TR _____
04/12/23	9181985	Communications with counsel for CalPrivate Bank regarding notice of interim distribution, prior recovery rate, and related issues	Fates, Edward (Ted)	0.40	275.40	126,184.05	WO	HD	TR _____
04/13/23	9197890	Call/emails with counsel for CTC regarding issues relating to receivership distributions and CTC participation right (.6) discuss same with Receiver (.3) advise Receiver on responses to investor inquiries concerning distributions and timing of same (.4) advise Receiver on issues relating to dissolved entity investor (.4)	Fates, Edward (Ted)	1.70	1,170.45	127,354.50	WO	HD	TR _____

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04/14/23	9184364	Analyze and advise Receiver on investor distribution issues and correspondence with investors re: same	Fates, Edward (Ted)	0.40	275.40	127,629.90	WO	HD	TR
04/17/23	9186985	Communications with counsel for Kim Peterson regarding intention to appeal denial of motion for stay of distributions, advise Receiver re: same	Fates, Edward (Ted)	0.30	206.55	127,836.45	WO	HD	TR
04/17/23	9188233	Call/email with counsel regarding appeal and assess procedural issues related to temp/emergency stay briefing/timeline.	Zaro, David	0.60	537.30	128,373.75	WO	HD	TR
04/18/23	9197885	Analyze Peterson emergency motion to Ninth Circuit to stay distributions pending appeal (.9) advise Receiver re: same (.3) communications with court regarding intent to oppose emergency motion and timing (.2) work on opposition to emergency motion (3.8)	Fates, Edward (Ted)	5.20	3,580.20	131,953.95	WO	HD	TR
04/19/23	9188807	Revisions to opposition to Peterson emergency motion for stay pending appeal from Ninth Circuit (2.3) discuss same with Receiver (.9) analyze email objection to distributions from counsel for Peterson (.2) communications with counsel for CalPrivate Bank re: Peterson emergency motion and opposition thereto (.7) communications with Receiver and counsel for investors regarding need for updated contact information (.2)	Fates, Edward (Ted)	4.30	2,960.55	134,914.50	WO	HD	TR
04/19/23	9191290	Call with Receiver related to appeals re: to the Receiver distribution/motion for stay and response (.3). Follow-up o briefing by	Zaro, David	0.60	537.30	135,451.80	WO	HD	TR

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		Receiver in opposition to stay motion and follow-up (.3).							
04/20/23	9189798	Revise and finalize opposition to Peterson emergency motion for stay of distributions pending appeal (1.2) discuss website update for investors regarding interim distributions and stay motion with Receiver (.2)	Fates, Edward (Ted)	1.40	963.90	136,415.70	WO	HD	TR _____
04/20/23	9191394	Analysis of the Receiver's brief in opposition to the appellants emergency motion and call with counsel, follow-up regarding strategy.	Zaro, David	0.80	716.40	137,132.10	WO	HD	TR _____
04/21/23	9193231	Several emails/call with Receiver concerning the reply to opposition to emergency stay motion and follow-up (.3). Evaluate the reply brief from Peterson regarding emergency stay motion (.5).	Zaro, David	0.80	716.40	137,848.50	WO	HD	TR _____
04/21/23	9196936	Analyze Peterson arguments in reply relating to emergency motion to stay distributions (.9) discuss same with Receiver (.3) advise Receiver on update to receivership website concerning potential stay / delay in distributions (.4) communications with counsel for CalPrivate Bank re: Peterson emergency stay motion (.3)	Fates, Edward (Ted)	1.90	1,308.15	139,156.65	WO	HD	TR _____
04/24/23	9192816	Communications with counsel for CalPrivate Bank regarding Peterson emergency motion and appeal issues (.4) call/emails with Receiver and counsel for deceased claimant regarding estate	Fates, Edward (Ted)	2.40	1,652.40	140,809.05	WO	HD	TR _____

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		beneficiaries and distributions (.5) analyze order denying emergency stay motion and advise Receiver re: same (.2) work on response to counsel for Peterson regarding objection to notice of interim distribution (.5) discuss same with Receiver (.2) finalize same (.2) advise Receiver on update for receivership website (.1) analyze order approving CalPrivate settlement (.3)							
04/24/23	9195941	Evaluate the Court of Appeals decision related to the Peterson entities' stay motion and follow-up (.3). Calls with the Receiver and counsel related to the appeals (.3).	Zaro, David	0.60	537.30	141,346.35	WO	HD	TR
04/25/23	9193898	Communications with Receiver and counsel for CalPrivate regarding approval of settlement, dismissal of appeal, settlement payment, handling of state court claims against Peterson, and related issues (1.6) communications with Receiver and counsel for CTC re: participating right distribution issues (.9) respond to direct inquiries from investors regarding distributions, timing and related issues (.6)	Fates, Edward (Ted)	3.10	2,134.35	143,480.70	WO	HD	TR
04/25/23	9203949	Evaluate the orders related to the CalPrivate settlement, and the Court of Appeals filing.	Zaro, David	0.40	358.20	143,838.90	WO	HD	TR
04/26/23	9195860	Communications with Receiver and counsel for CalPrivate regarding dismissal of CalPrivate appeal, withdrawal of CalPrivate objection to claim treatment, and settlement payment	Fates, Edward (Ted)	0.80	550.80	144,389.70	WO	HD	TR

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

Trans Date	Index	Description of Service Rendered	Timekeeper	Hours	Fees	Sum	Circle	Action	
04/27/23	9197586	Communications with Receiver regarding CalPrivate distribution and settlement payment (.5) discuss plan and timing for transmission of interim distribution checks to investors with Receiver (.4) work on letter to investors to accompany interim distribution checks (.8)	Fates, Edward (Ted)	1.70	1,170.45	145,560.15	WO	HD	TR
04/28/23	9198600	Analyze impact of Peterson notice of appeal of order approving CalPrivate settlement (.4) discuss same with Receiver (.3) communications with Receiver and counsel for CalPrivate regarding wire transfer for settlement payment (.5)	Fates, Edward (Ted)	1.20	826.20	146,386.35	WO	HD	TR
05/01/23	9205267	Communications with Receiver and counsel for investor group regarding missing investor address information	Fates, Edward (Ted)	0.40	275.40	146,661.75	WO	HD	TR
05/03/23	9207727	Analyze and advise Receiver on banking issues relating to distribution checks	Fates, Edward (Ted)	0.30	206.55	146,868.30	WO	HD	TR
05/04/23	9207895	Analyze issues relating to Peterson appeal of order approving CalPrivate settlement (.3) communications with Receiver and counsel for investor regarding updated contact information (.2)	Fates, Edward (Ted)	0.50	344.25	147,212.55	WO	HD	TR
05/04/23	9210435	Analysis of issues related to Peterson appeal of CalPrivate settlement order (.7). Conference with counsel related to the CalPrivate appeal, follow-up to assess strategy (.6).	Zaro, David	1.30	1,164.15	148,376.70	WO	HD	TR
05/05/23	9210844	Follow-up on CalPrivate settlement and appeal of the approved order and call with	Zaro, David	0.60	537.30	148,914.00	WO	HD	TR

09/29/23 15:58:32 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 counsel related to appellate records/strategy.	Timekeeper	Hours	Fees	Sum	Circle	Action	
05/08/23	9210707	Advise Receiver on communications with investors relating to distributions	Fates, Edward (Ted)	0.20	137.70	149,051.70	WO	HD	TR _____
05/10/23	9212267	Assist Receiver with respond to inquiries from IRA custodian relating to distribution payments (.3) discuss Notice of Allowed Claim Adjustment for CalPrivate claim with Receiver (.3) work on same (.8) discuss issues and strategy relating to Peterson appeal of denial of claims in receivership with Receiver (.4) analyze Peterson mediation statement for appeal of CalPrivate settlement approval order (.3)	Fates, Edward (Ted)	2.10	1,445.85	150,497.55	WO	HD	TR _____
05/12/23	9214712	Communications with Receiver and counsel for CTC regarding notice of allowed claim adjustment resulting from settlement payment made to CalPrivate and impact on CTC participation right	Fates, Edward (Ted)	0.70	481.95	150,979.50	WO	HD	TR _____
06/28/23	9261494	Communications with Receiver and counsel for investors who have not cashed distribution checks	Fates, Edward (Ted)	0.70	481.95	151,461.45	WO	HD	TR _____

Proforma Summary

Timekeeper Number	Timekeeper	Hours	Rate	Amounts
000313	Zaro, David	43.90	895.50	39,312.45
000820	Kaup, John	0.60	337.50	202.50
001665	Fates, Edward (Ted)	154.90	688.50	106,648.65
001842	Del Castillo, Joshua	0.80	688.50	550.80
002592	Robichaud, James	13.70	346.50	4,747.05

09/29/23 15:58:32 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
		213.90		\$151,461.45
Subtotal Fees				\$151,461.45
Discount				0.00
Total Fees				151,461.45
Total Disbursements				0.00

Attorney Billing Instructions

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

Billing Instructions

expires 6/30/2024: 10% off standard rates (automatic); no text editing; copies @ .10

Account Summary – As Of 09/29/23

	Fiscal YTD			Calendar YTD			LTD		
	Total	Fees	Disb.	Total	Fees	Disb.	Total	Fees	Disbursements
Worked	11,128.95	11,128.95	0.00	162,590.40	162,590.40	0.00	746,065.80	746,065.80	0.00
Unbilled Adj	0.00	0.00	0.00	0.00	0.00	0.00	0.99	0.99	0.00
Billed	0.00	0.00	0.00	184,158.54	184,158.54	0.00	583,476.39	583,476.39	0.00
Collected	0.00	0.00	0.00	184,158.54	184,158.54	0.00	583,476.39	583,476.39	0.00
AR Write Off	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00
WIP	162,590.40	162,590.40	0.00						
Balance									
AR Balance	0.00	0.00	0.00						
Unalloc	0.00								
Payment									
Client Trust	0.00								
Balance									

Billing Address

09/29/23 15:58:32 PROFORMA STATEMENT FOR MATTER 378827.00006 (Krista Freitag, as Receiver for ANI Deve) (SEC v. Champion-Cain - Claims & Distribu)

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

09/29/23 15:58:34 PROFORMA STATEMENT FOR MATTER 378827.00007 (Krista Freitag, as Receiver for ANI Deve) (SEC v. Champion-Cain - Third Party Recov)

Preliminary Billing Form

Billing Atty: 001665 - Fates, Edward (Ted)	Matter #: 378827.00007	Client Name: Krista Freitag, as Receiver for ANI Deve
Date of Last Billing: 04/27/23		Matter Name: SEC v. Champion-Cain - Third Party Recov
Proforma Number: 1235483		
Client/Matter Joint Group # 378827-1		Client Matter Number:

Fees for Matter 378827.00007.(SEC v. Champion-Cain - Third Party Recov)

Trans Date	Index	Description of Service Rendered	Timekeeper	Hours	Fees	Sum	Circle	Action	
01/03/23	9076136	Research procedure for seeking judicial reference in federal court case against Illa Designs.	Williams, Rebecca	0.70	311.85	311.85	WO	HD	TR
01/03/23	9076137	Revise draft complaint against Illa Designs.	Williams, Rebecca	0.50	222.75	534.60	WO	HD	TR
01/06/23	9079478	Finalize draft complaint against Illa Designs.	Williams, Rebecca	0.10	44.55	579.15	WO	HD	TR
01/10/23	9088416	Analyze and advise Receiver on issues relating to Illa Designs/Churillas and draft complaint for breach of loan agreement and guaranty	Fates, Edward (Ted)	0.60	413.10	992.25	WO	HD	TR
01/12/23	9083486	Analyze and advise on next steps regarding loan and guaranty enforcement action against Illa Designs and Churillas	Fates, Edward (Ted)	0.40	275.40	1,267.65	WO	HD	TR
01/12/23	9091303	Finalize and file complaint against Illa Designs.	Williams, Rebecca	0.50	222.75	1,490.40	WO	HD	TR

09/29/23 15:58:34 PROFORMA STATEMENT FOR MATTER 378827.00007 (Krista Freitag, as Receiver for ANI Deve) (SEC v. Champion-Cain - Third Party Recov)

Fees for Matter 378827.00007.(SEC v. Champion-Cain - Third Party Recov)

Trans Date	Index	Description of Service Rendered	Timekeeper	Hours	Fees	Sum	Circle Action			
01/13/23	9088428	Advise on filing issues for complaint and notice of related case against Illa Designs, service of process	Fates, Edward (Ted)	0.70	481.95	1,972.35	WO	HD	TR	_____
01/13/23	9091306	Draft notice of related case.	Williams, Rebecca	0.60	267.30	2,239.65	WO	HD	TR	_____
01/17/23	9091435	Advise on service issues and next steps for Illa Designs matter	Fates, Edward (Ted)	0.30	206.55	2,446.20	WO	HD	TR	_____
01/19/23	9091450	Review and advise Receiver re: transfer order, service of process, and next steps/timing for Illa Designs case	Fates, Edward (Ted)	0.40	275.40	2,721.60	WO	HD	TR	_____
01/19/23	9358978	Follow-up on the Illa Designs action with counsel as to the case, discovery and settlement prospects (.4).	Zaro, David	0.40	358.20	3,079.80	WO	HD	TR	_____
02/01/23	9123005	Draft joint motion/stipulation and proposed order to extend defendants' time to answer in Illa Designs matter.	Williams, Rebecca	0.30	133.65	3,213.45	WO	HD	TR	_____
02/02/23	9111393	Review and respond to correspondence regarding the preparation of the Texas Deed of Trust.	Shepherd, Vincent	0.20	81.90	3,295.35	WO	HD	TR	_____
02/03/23	9108474	Draft Deed of Trust securing Churillas settlement.	Ensbury, Martin A.	0.30	163.35	3,458.70	WO	HD	TR	_____
02/03/23	9138057	Review final joint motion to extend answer time.	Williams, Rebecca	0.10	44.55	3,503.25	WO	HD	TR	_____
02/06/23	9111397	Attend to documentation issues regarding the preparation of the Deed of Trust.	Shepherd, Vincent	1.00	409.50	3,912.75	WO	HD	TR	_____

09/29/23 15:58:34 PROFORMA STATEMENT FOR MATTER 378827.00007 (Krista Freitag, as Receiver for ANI Deve) (SEC v. Champion-Cain - Third Party Recov)

Fees for Matter 378827.00007.(SEC v. Champion-Cain - Third Party Recov)

Trans Date	Index	Description of Service Rendered	Timekeeper	Hours	Fees	Sum	Circle	Action	
02/07/23	9114871	Prepare the Texas Deed of Trust.	Shepherd, Vincent	0.70	286.65	4,199.40	WO	HD	TR
02/09/23	9113325	Call/emails with former and current managers for Santaluz Wonderfront LLC and Wonderlust Events, LLC regarding financial status of entities and production of financial records relating to ANI investment (2.3) advise Receiver re: same (.5) advise on issues relating to Deed of Trust to secure Churillas settlement payments (.4)	Fates, Edward (Ted)	3.20	2,203.20	6,402.60	WO	HD	TR
02/09/23	9113923	Draft deed of trust, including Texas law and residential property revisions; review settlement agreement and related judgment and "Released Claim" loan documents for issues regarding collateral and security therefor and foreclosure impediments; review title report for Property and related existing Loan Documents, legal description, owner vesting deed and names, and recording procedures; correspondence regarding obtaining additional factual information for completion of drafting Deed of Trust.	Ensbury, Martin A.	1.20	653.40	7,056.00	WO	HD	TR
02/10/23	9114873	Prepare the Texas Deed of Trust.	Shepherd, Vincent	4.10	1,678.95	8,734.95	WO	HD	TR
02/10/23	9115293	Draft and revise Texas Deed of Trust, including for Texas law issues and payment timing for settlement agreement and stipulated judgment; review 1st lien deed of trust to confirm this Deed of Trust permitted thereunder; coordinate trustee, execution and recordation of same.	Ensbury, Martin A.	1.70	925.65	9,660.60	WO	HD	TR

09/29/23 15:58:34 PROFORMA STATEMENT FOR MATTER 378827.00007 (Krista Freitag, as Receiver for ANI Deve) (SEC v. Champion-Cain - Third Party Recov)

Fees for Matter 378827.00007.(SEC v. Champion-Cain - Third Party Recov)

Trans Date	Index	Description of Service Rendered	Timekeeper	Hours	Fees	Sum	Circle	Action	
02/10/23	9116067	Attend to discussions re deed of trust; review deed of trust.	Nicoletti, Mark	1.10	816.75	10,477.35	WO	HD	TR _____
02/13/23	9117154	Attend to discussion re Deed of Trust.	Nicoletti, Mark	0.30	222.75	10,700.10	WO	HD	TR _____
02/13/23	9117334	Revise and draft Deed of Trust; review prior lien Loan Documents to confirm permissibility and priority thereof; coordinate recordation of same; and review applicable law to confirm necessary request for notice filings regarding prior deeds of trust.	Ensburry, Martin A.	2.30	1,252.35	11,952.45	WO	HD	TR _____
02/13/23	9121272	Prepare the Texas Deed of Trust	Shepherd, Vincent	3.70	1,515.15	13,467.60	WO	HD	TR _____
02/14/23	9118307	Draft and revise deed of trust; correspondence regarding same with litigation counsel; confirm recordability of deed of trust under local recording requirements; research regarding notice requirements for junior lienholders in Texas.	Ensburry, Martin A.	1.00	544.50	14,012.10	WO	HD	TR _____
02/14/23	9121286	Prepare the Texas deed of trust.	Shepherd, Vincent	1.50	614.25	14,626.35	WO	HD	TR _____
02/14/23	9359007	Analyze issues re: Deed of Trust for Churilla settlement (.4) communications with Churillas re: same (.3)	Fates, Edward (Ted)	0.70	481.95	15,108.30	WO	HD	TR _____
02/15/23	9119519	Draft and revise Deed of Trust, including for suretyship waivers (not all Settlement Agreement parties sign DOT), Texas and Travis County recording/acknowledgment	Ensburry, Martin A.	1.40	762.30	15,870.60	WO	HD	TR _____

09/29/23 15:58:34 PROFORMA STATEMENT FOR MATTER 378827.00007 (Krista Freitag, as Receiver for ANI Deve) (SEC v. Champion-Cain - Third Party Recov)

Fees for Matter 378827.00007.(SEC v. Champion-Cain - Third Party Recov)

Trans Date	Index	Description of Service Rendered	Timekeeper	Hours	Fees	Sum	Circle Action			
		requirements, senior deed of trust language and antideficiency protection TX waivers; research regarding notice requirements to junior lienholders under TX law; correspondence with title company regarding recording of DOT; coordinate execution/acknowledgment of DOT.								
02/15/23	9121292	Prepare the Texas deed of trust.	Shepherd, Vincent	0.50	204.75	16,075.35	WO	HD	TR	_____
02/15/23	9359011	Communications with E. Churilla re: settlement (.4)	Fates, Edward (Ted)	0.40	275.40	16,350.75	WO	HD	TR	_____
02/21/23	9137857	Communications with Churillas re: settlement, stipulation for entry of judgment and Deed of Trust to secure settlement payments	Fates, Edward (Ted)	0.40	275.40	16,626.15	WO	HD	TR	_____
02/23/23	9137852	Follow up communications with E. Churilla (.3) advise G. Rodriguez re: same (.2)	Fates, Edward (Ted)	0.50	344.25	16,970.40	WO	HD	TR	_____
02/27/23	9131161	Review title regarding two prior divorces and potential interests of spouses in Property, and advise regarding risks of same, and revise Deed of Trust.	Ensburry, Martin A.	0.90	490.05	17,460.45	WO	HD	TR	_____
02/27/23	9135112	Review and revise the deed of trust.	Shepherd, Vincent	0.20	81.90	17,542.35	WO	HD	TR	_____
02/27/23	9137849	Communications with E. Churilla regarding Deed of Trust to secure settlement, settlement agreement and revisions to same (.8) discuss same with Receiver and G. Rodriguez (.4)	Fates, Edward (Ted)	1.20	826.20	18,368.55	WO	HD	TR	_____

09/29/23 15:58:34 PROFORMA STATEMENT FOR MATTER 378827.00007 (Krista Freitag, as Receiver for ANI Deve) (SEC v. Champion-Cain - Third Party Recov)

Fees for Matter 378827.00007.(SEC v. Champion-Cain - Third Party Recov)

Trans Date	Index	Description of Service Rendered	Timekeeper	Hours	Fees	Sum	Circle	Action	
03/01/23	9149346	Communications with E. Churilla re: execution of settlement documents and process for court approval (.4) communications with Receiver re: same (.3) work on motion for approval of settlement (2.1)	Fates, Edward (Ted)	2.80	1,927.80	20,296.35	WO	HD	TR
03/02/23	9139174	Communications with Churillas regarding executed settlement documents	Fates, Edward (Ted)	0.30	206.55	20,502.90	WO	HD	TR
03/06/23	9158945	Discuss revisions to motion for approval of Illa Designs / Churilla settlement with Receiver (.3) work on same (.4) work on Receiver declaration and proposed order (1.2) discuss revisions to same with Receiver (.3) call with law clerk regarding hearing date for motion (.1)	Fates, Edward (Ted)	2.30	1,583.55	22,086.45	WO	HD	TR
03/20/23	9156233	Draft and revise deed of trust release and coordinate its recordation.	Ensburry, Martin A.	0.20	108.90	22,195.35	WO	HD	TR
03/21/23	9156849	Discuss issues relating to marketing/sale of Churilla property in TX with G. Rodriguez	Fates, Edward (Ted)	0.20	137.70	22,333.05	WO	HD	TR
03/21/23	9157623	Draft Deed of Trust release and arrange for its execution, notarization and recordation.	Ensburry, Martin A.	0.10	54.45	22,387.50	WO	HD	TR
03/22/23	9159066	Draft Deed of Trust release and prepare same for execution, notarization and recordation.	Ensburry, Martin A.	0.70	381.15	22,768.65	WO	HD	TR
03/27/23	9165534	Coordinate execution of Deed of Trust release.	Ensburry, Martin A.	0.10	54.45	22,823.10	WO	HD	TR

09/29/23 15:58:34 PROFORMA STATEMENT FOR MATTER 378827.00007 (Krista Freitag, as Receiver for ANI Deve) (SEC v. Champion-Cain - Third Party Recov)

Fees for Matter 378827.00007.(SEC v. Champion-Cain - Third Party Recov)

Trans Date	Index	Description of Service Rendered	Timekeeper	Hours	Fees	Sum	Circle	Action	
03/31/23	9169665	Correspondence regarding Churilla Deed of Trust status (and related court proceedings); correspondence with recorder regarding trustee information and coordination of recordation.	Ensburry, Martin A.	0.20	108.90	22,932.00	WO	HD	TR
04/04/23	9176384	Coordinate recordation of deed of trust.	Ensburry, Martin A.	0.10	54.45	22,986.45	WO	HD	TR
04/11/23	9181256	Review accommodation recording indemnity for Copp Deed of Trust and correspond with First American regarding same; review San Diego county recording requirements and related fees; correspondence regarding coordinating recordation of same; review indemnity agreement required to be signed.	Ensburry, Martin A.	0.50	272.25	23,258.70	WO	HD	TR
04/12/23	9182985	Review indemnity agreement required for accommodation recordation and arrange for its execution by trustor.	Ensburry, Martin A.	0.30	163.35	23,422.05	WO	HD	TR
04/18/23	9187808	Review order approving settlement with Churillas (.1) communications with E. Churilla re: same and Deed of Trust (.2)	Fates, Edward (Ted)	0.30	206.55	23,628.60	WO	HD	TR
04/20/23	9189917	Communications with E. Churilla re: settlement and signed Deed of Trust (.2) discuss monthly settlement payments with Receiver (.1)	Fates, Edward (Ted)	0.30	206.55	23,835.15	WO	HD	TR
04/24/23	9193305	Review signed Deed of Trust from E. Churilla (.1) communications with E. Churilla and Receiver re: same and monthly settlement payments (.5) attention to issues re: recording of Deed of Trust (.2)	Fates, Edward (Ted)	0.80	550.80	24,385.95	WO	HD	TR

09/29/23 15:58:34 PROFORMA STATEMENT FOR MATTER 378827.00007 (Krista Freitag, as Receiver for ANI Deve) (SEC v. Champion-Cain - Third Party Recov)

Fees for Matter 378827.00007.(SEC v. Champion-Cain - Third Party Recov)

Trans Date	Index	Description of Service Rendered	Timekeeper	Hours	Fees	Sum	Circle Action			
04/24/23	9193902	Review executed/notarized Churillas Deed of Trust and arrange for recordation.	Ensburry, Martin A.	0.40	217.80	24,603.75	WO	HD	TR	_____
04/26/23	9195310	Communications with E. Churilla re: recorded Deed of Trust and monthly settlement payments	Fates, Edward (Ted)	0.20	137.70	24,741.45	WO	HD	TR	_____
06/26/23	9259228	Communications with Receiver and E. Churilla regarding check for installment settlement payment	Fates, Edward (Ted)	0.20	137.70	24,879.15	WO	HD	TR	_____

Proforma Summary

Timekeeper		Hours	Rate	Amounts
Number	Timekeeper			
000313	Zaro, David	0.40	895.50	358.20
001665	Fates, Edward (Ted)	16.20	688.50	11,153.70
002348	Williams, Rebecca	2.80	445.50	1,247.40
002413	Nicoletti, Mark	1.40	742.50	1,039.50
002485	Ensburry, Martin A.	11.40	544.50	6,207.30
002573	Shepherd, Vincent	11.90	409.50	4,873.05
		44.10		\$24,879.15
Subtotal Fees				\$24,879.15
Discount				0.00
Total Fees				24,879.15
Total Disbursements				0.00

Attorney Billing Instructions

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

Billing Instructions

09/29/23 15:58:34 PROFORMA STATEMENT FOR MATTER 378827.00007 (Krista Freitag, as Receiver for ANI Deve) (SEC v. Champion-Cain - Third Party Recov)

expires 6/30/2024: 10% off standard rates (automatic); no text editing; copies @ .10

Account Summary – As Of 09/29/23

	Fiscal YTD			Calendar YTD			LTD		
	Total	Fees	Disb.	Total	Fees	Disb.	Total	Fees	Disbursements
Worked	774.00	774.00	0.00	25,653.15	25,653.15	0.00	1,031,871.60	1,031,871.60	0.00
Unbilled Adj	0.00	0.00	0.00	0.00	0.00	0.00	78.49	68.49	10.00
Billed	0.00	0.00	0.00	190,989.27	190,989.27	0.00	1,006,153.20	1,006,153.20	0.00
Collected	0.00	0.00	0.00	190,989.27	190,989.27	0.00	1,006,153.20	1,006,153.20	0.00
AR Write Off	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00
WIP	25,653.15	25,653.15	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
 401 West 'A' Street, Suite 1830
 San Diego, CA 92101

09/29/23 15:58:36 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: 04/27/23 Matter Name: SEC v. Champion-Cain - Pending Litigatio
 Proforma Number: 1235483
 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	
01/18/23	9087761	Analyze plaintiff's motion to dismiss Luu v. Patio putative class action and supporting papers	Fates, Edward (Ted)	0.60	413.10	413.10	WO	HD	TR

Proforma Summary

Timekeeper Number	Timekeeper	Hours	Rate	Amounts
001665	Fates, Edward (Ted)	0.60	688.50	413.10
		0.60		\$413.10
Subtotal Fees				\$413.10
Discount				0.00
Total Fees				413.10
Total Disbursements				0.00

Attorney Billing Instructions

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

Billing Instructions

expires 6/30/2024: 10% off standard rates (automatic); no text editing; copies @ .10

09/29/23 15:58:36 PROFORMA STATEMENT FOR MATTER 378827.00008 (Krista Freitag, as Receiver for ANI Deve) (SEC v. Champion-Cain - Pending Litigation)

Account Summary – As Of 09/29/23

	Fiscal YTD			Calendar YTD			LTD		
	Total	Fees	Disb.	Total	Fees	Disb.	Total	Fees	Disbursements
Worked	491.40	491.40	0.00	904.50	904.50	0.00	60,325.20	60,325.20	0.00
Unbilled Adj	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00
Billed	0.00	0.00	0.00	22,658.40	22,658.40	0.00	59,420.70	59,420.70	0.00
Collected	0.00	0.00	0.00	22,658.40	22,658.40	0.00	59,420.70	59,420.70	0.00
AR Write Off	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00
<i>WIP</i>	<i>Total</i>	<i>Fees</i>	<i>Costs</i>						
<i>Balance</i>	<i>904.50</i>	<i>904.50</i>	<i>0.00</i>						
<i>AR Balance</i>	<i>0.00</i>	<i>0.00</i>	<i>0.00</i>						
<i>Unalloc</i>	<i>0.00</i>								
<i>Payment</i>									
<i>Client Trust</i>	<i>0.00</i>								
<i>Balance</i>									

Billing Address

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

09/29/23 15:58:37 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: 04/27/23

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

Proforma Number: 1235483

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	
01/23/23	9091429	Revisions to Receiver's Ninth Interim Fee Application (.7) discuss same with Receiver (.2) meet and confer communications with SEC counsel (.2)	Fates, Edward (Ted)	1.10	757.35	757.35	WO	HD	TR
01/24/23	9093710	Meet and confer communications with SEC counsel regarding interim fee applications (.2) finalize revisions to Receiver interim fee application, exhibits and notice of hearing (.2)	Fates, Edward (Ted)	0.40	275.40	1,032.75	WO	HD	TR
03/02/23	9139050	Communications with Receiver regarding 10th interim fee application	Fates, Edward (Ted)	0.30	206.55	1,239.30	WO	HD	TR
03/06/23	9141974	Revisions to Receiver's 10th interim fee application (1.3) discuss same with Receiver (.4) meet and confer communications with SEC counsel (.2)	Fates, Edward (Ted)	1.90	1,308.15	2,547.45	WO	HD	TR
03/10/23	9158964	Revise and finalize Receiver's 10th interim fee application, notice, and proposed order	Fates, Edward (Ted)	0.40	275.40	2,822.85	WO	HD	TR

09/29/23 15:58:37 PROFORMA STATEMENT FOR MATTER 378827.00009 (Krista Freitag, as Receiver for ANI Deve) (SEC v. Champion-Cain - Employment/Fees)

Proforma Summary

Timekeeper

Number	Timekeeper	Hours	Rate	Amounts
001665	Fates, Edward (Ted)	4.10	688.50	2,822.85
		4.10		\$2,822.85
Subtotal Fees				\$2,822.85
Discount				0.00
Total Fees				2,822.85
Total Disbursements				0.00

Attorney Billing Instructions

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

Billing Instructions

expires 6/30/2024: 10% off standard rates (automatic); no text editing; copies @ .10

Account Summary – As Of 09/29/23

	Fiscal YTD			Calendar YTD			LTD		
	Total	Fees	Disb.	Total	Fees	Disb.	Total	Fees	Disbursements
Worked	148.50	148.50	0.00	2,971.35	2,971.35	0.00	15,027.75	15,027.75	0.00
Unbilled Adj	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00
Billed	0.00	0.00	0.00	5,407.20	5,407.20	0.00	12,056.40	12,056.40	0.00
Collected	0.00	0.00	0.00	5,407.20	5,407.20	0.00	12,056.40	12,056.40	0.00
AR Write Off	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00
WIP	2,971.35	2,971.35	0.00						
Balance									
AR Balance	0.00	0.00	0.00						
Unalloc	0.00								
Payment									
Client Trust	0.00								
Balance									

09/29/23 15:58:37 PROFORMA STATEMENT FOR MATTER 378827.00009 (Krista Freitag, as Receiver for ANI Deve) (SEC v. Champion-Cain - Employment/Fees)

Billing Address

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