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KRISTA L. FREITAG

13 UNITED STATES DISTRICT COURT
14 SOUTHERN DISTRICT OF CALIFORNIA
15

16 SECURITIES AND EXCHANGE
17 COMMISSION,

18 Plaintiff,

19 v.

20 GINA CHAMPION-CAIN and ANI
DEVELOPMENT, LLC,

21 Defendants,

22 AMERICAN NATIONAL
23 INVESTMENTS, INC.,

24 Relief Defendant.
25
26
27
28

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

**SIXTEENTH 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: April 16, 2026
Time: 1:30 p.m.
Courtroom: 14A
Judge: Hon. Todd W. Robinson

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 Sixteenth Interim Application for Payment of Fees and Reimbursement
6 of Expenses (the “Application”). This Application covers the six-month period
7 from July 1, 2025 through December 31, 2025 (the “Application Period”), and seeks
8 approval of \$156,737.70 in fees and \$7,857.26 in expenses, and an order authorizing
9 the Receiver to pay, on an interim basis, 80% of the fees incurred (\$125,390.16) and
10 100% of the expenses incurred (\$7,857.26).

11 The application also seeks approval and payment of \$827,910.45 in fees
12 associated with the Chicago Title litigation, in which Allen Matkins represented the
13 Receiver in her state court action against Chicago Title on behalf of the receivership
14 estate, which directly led to the Court-approved global settlement of \$24,359,133.64
15 (all appeals of which have now been denied).

16 **I. INTRODUCTION.**

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

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

1 Order due to the size and complexity of the receivership estate. Accordingly, the
 2 Receiver engaged Allen Matkins to assist with legal issues facing the receivership
 3 estate.

4 This Application should be read in conjunction with the Receiver’s Twenty-
 5 Fourth and Twenty-Fifth Interim Reports and Recommendations, filed on
 6 September 3, 2025 and January 6, 2026, respectively (Dkt. 1084, 1093), which
 7 describe in detail the Receiver’s activities during the six-month Application Period.

8 This Application seeks approval of \$156,737.70 in fees for a total of 199.8
 9 hours worked, and payment on an interim basis of 80% of that amount, or
 10 \$125,390.16. Allen Matkins has agreed to discount its standard hourly rates by 10%
 11 for this case. The work performed is described task-by-task in **Exhibit A**¹ and is
 12 broken down into the following categories:

Category	Hours	Amount
General Receivership	2.50	\$1,866.15
Reporting	3.40	\$2,983.50
Operations & Asset Sales	0.80	\$702.00
Claims & Distributions	2.20	\$1,930.50
Third Party Recoveries	11.60	\$10,132.20
Employment/Professional Fees	1.20	\$1,053.00
Claims Against Kim Peterson et al.	178.10	\$138,070.35
Total Fees	199.80	\$156,737.70

22 Allen Matkins’ work has allowed the Receiver to preserve and protect the
 23 substantial value of receivership estate assets, and in particular to advance the
 24
 25

26 _____
 27 ¹ While Allen Matkins has made efforts to ensure that its billing entries are
 28 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 receivership estate’s claims against Kim Peterson and his related entities and trusts
2 to judgments totaling over \$14 million.

3 This application also seeks approval of the \$827,910.45 in fees associated
4 with the Receiver’s state court action against Chicago Title, the resulting global
5 settlement of over \$24 million, and the various appeals of the approval orders (all of
6 which have now been resolved). The Receiver was authorized to file the lawsuit on
7 behalf of the receivership estate provided that Allen Matkins would handle the case
8 on a contingent fee basis. Dkt. 737. The contingent fee, however, would result in a
9 payment of over \$6 million to Allen Matkins. The firm has agreed to accept its
10 hourly fees in lieu of the contingent fee in the interest of conserving receivership
11 estate resources, providing great value to the receivership estate, and returning as
12 much money as possible to the investor victims of the Ponzi scheme.

13 Allen Matkins has worked diligently and efficiently to assist the Receiver in
14 carrying out her Court-ordered duties and should be compensated on an interim
15 basis for its work. The fees associated with the Receiver’s action against Chicago
16 Title, which are vastly less than the Court-ordered contingent fee, should also be
17 approved and paid.

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

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

20 1. General Receivership.

21 Allen Matkins’ work in this category focused on responding to inquiries from
22 the U.S. Small Business Administration regarding loans issued and debts owed to
23 the SBA by Gina Champion-Cain. The reasonable and necessary fees for Allen
24 Matkins’ work in this category total \$1,866.15.

25 2. Reporting.

26 Allen Matkins’ services in this category focus on assisting the Receiver in
27 preparing her Twenty-Fourth and Twenty-Fifth Interim Reports and
28 Recommendations, which were filed on September 3, 2025 and January 6, 2026,

1 respectively. Dkt. 1084, 1093. The reports includes detailed summaries of the
2 Receiver’s activities, funds recovered, real and personal property assets, property
3 taxes, insurance, loans and other investments, investigation of third party claims,
4 pending litigation, and other matters. The reports also detail the receipts and
5 disbursements for the receivership estate since the Receiver’s appointment and
6 provides her recommendations for the continued administration of the receivership.
7 The reasonable and necessary fees for Allen Matkins’ work in this category total
8 \$2,983.50.

9 3. Operations & Asset Sales.

10 Allen Matkins’ work in this category focused on advising the Receiver with
11 respect to the disposition of the receivership estate’s interest in the Casa del Zorro
12 hotel, including amending a Membership Interest Purchase Agreement to provide
13 the buyer with additional time to obtain financing necessary to close the transaction.
14 The reasonable and necessary fees for Allen Matkins’ work in this category total
15 \$702.00.

16 4. Claims & Distributions.

17 Services rendered in this category focus on responding to periodic inquiries
18 from investors or their counsel about the status/progress of pending matters. The
19 reasonable and necessary fees for Allen Matkins’ work in this category total
20 \$1,930.50.

21 5. Third Party Recoveries.

22 This portion of the Application pertains to work on claims against third
23 parties to recover amounts for the benefit of the receivership estate, but not
24 including Clawback Claims, which have their own category and are discussed
25 below. Allen Matkins assisted the Receiver with issues relating to the Illa Designs /
26 Churilla settlement, which was approved by the Court on April 18, 2023. Dkt. 993.
27 The settlement is expected to generate a recovery of \$265,000 for the receivership
28

1 estate once the Churillas sell or refinance their property located in Texas, on which
2 the receivership estate has a recorded Deed of Trust.

3 Allen Matkins communicated with the Churillas (as well as their broker in
4 Texas) about the process for listing and marketing their property in Austin, Texas,
5 worked on an amendment to the settlement agreement, and advised the Receiver on
6 the legal issues and strategy. The reasonable and necessary fees for Allen Matkins’
7 work in this category total \$10,132.20.

8 6. Employment/Professional Fees

9 Although fee applications are a necessary component of federal equity
10 receiverships, neither the Receiver nor her professionals charge for time spent
11 preparing their own detailed applications. Allen Matkins assisted in preparing the
12 Receiver’s Fifteenth Interim Fee Application (covering six months of work) and
13 with meet and confer communications with counsel for the Commission. The fee
14 applications were filed on September 4, 2025. The reasonable and necessary fees
15 for Allen Matkins’ work in this category total \$1,053.00.

16 7. Claims Against Kim Peterson.

17 This portion of the Application pertains to work on claims against Kim
18 Peterson and his entities to recover amounts for the benefit of the receivership
19 estate. Due to the confidential nature of the ongoing legal work on this matter and
20 the Receiver’s litigation strategy, the Receiver has filed a motion concurrently
21 herewith to file this portion of the Application under seal. The reasonable and
22 necessary fees for Allen Matkins’ work in this category total \$138,070.35. As a
23 result of the Receiver and Allen Matkins’ work, the receivership estate now holds
24 judgments against Kim Peterson and his entities and trusts totaling more than
25 \$14 million.

26 8. Chicago Title Litigation.

27 On December 13, 2021, after holding several hearings on the Receiver’s
28 motion for authority to pursue claims against Chicago Title, the Court conditionally

1 granted the Receiver’s motion and authorized the Receiver to file an action against
2 Chicago Title in San Diego Superior Court, provided her counsel (Allen Matkins)
3 could be engaged to handle the case on the contingent fee basis laid out in the
4 motion. Dkt. 737. In the motion, the Receiver had stated that Allen Matkins would
5 handle the case either on an hourly fee basis or on a contingent fee basis as follows:

- 6 • 20% of the total amount recovered if the case settles prior to mediation;
- 7 • 25% of the total amount recovered if the case settles prior to the final
8 status conference; or
- 9 • 30% of the total amount recovered through settlement or judgment if
10 the case resolves after the final status conference.

11 Dkt. 323-1.

12 The Chicago Title case ultimately settled after mediation, meaning Allen
13 Matkins would be entitled to a 25% contingent fee of over \$6 million. The firm,
14 however, is not asking to be paid that amount or anything close to it. Allen Matkins
15 has agreed to only seek payment of its hourly fees for the Chicago Title litigation
16 and related appeals, which fees total \$827,910.45. This results in a savings for the
17 receivership estate of over \$5.1 million, which funds can be distributed to the
18 victims of the Ponzi scheme. Allen Matkins’ hours worked on the Chicago Title
19 case and related appeals total 1140.2 and its detailed bills for such work are included
20 in Exhibit A.

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

22 Allen Matkins requests that the Court approve reimbursement of \$7,857.26 in
23 out-of-pocket costs. The itemization of such expenses is summarized below by
24 billing category.

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Category	Total
Messenger/FedEx Fees	\$182.23
PACER/Research Fees	\$19.40
Court/Filing Fees	\$1,245.97
E-Discovery	\$3,984.00
Service of Process/Surveillance	\$2,425.66
Total	\$7,857.26

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

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

In allowing fees, a court should consider “the time, labor and skill required, but not necessarily that actually expended, in the proper performance of the duties imposed by the court upon the receiver . . . , the fair value of such time, labor and skill measured by conservative business standards, the degree of activity, integrity and dispatch with which the work is conducted and the result obtained.” *United States v. Code Prods. Corp.*, 362 F. 2d 669, 673 (3d Cir. 1966) (internal quotation marks omitted). In practical terms, receiver and professional compensation thus ultimately rests upon the result of an equitable, multi-factor balancing test involving the “economy of administration, the burden that the estate may be able to bear, the amount of time required, although not necessarily expended, and the overall value of the services to the estate.” *In re Imperial 400 Nat’l, Inc.*, 432 F.2d 232, 237 (3d Cir.

1 1970). Regardless of how this balancing test is formulated, no single factor is
2 determinative and “a reasonable fee is based [upon] all circumstances surrounding
3 the receivership.” *SEC v. W.L. Moody & Co., Bankers (Unincorporated)*, 374 F.
4 Supp. 465, 480 (S.D. Tex. 1974).

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

12 The Receiver promptly determined that experienced, qualified counsel was
13 necessary due to the size and complexity of the receivership estate and the Court
14 agreed, approving Allen Matkins’ employment, initially on a provisional basis and
15 then on a non-provisional basis. Dkt. 126, 309. The Court also previously approved
16 the Receiver’s proposal to file interim reports and fee applications on a quarterly
17 basis. Dkt. 126. As noted above, this interim application covers two quarters of
18 work.

19 Allen Matkins has submitted a detailed fee application which describes the
20 nature of the services rendered. *See* **Exhibit A**. Allen Matkins has endeavored to
21 staff matters as efficiently as possible while remaining cognizant of the complexity
22 of issues presented. As noted above, the request for fees is based on Allen Matkins’
23 customary billing rates charged for comparable services provided in other matters,
24 less a 10% discount. Moreover, Allen Matkins wrote off and did not charge for 2.50
25 hours of work (\$2,193.75 in fees).

26 The work performed by Allen Matkins was essential to carrying out the
27 Receiver’s Court-ordered duties. The Receiver and Allen Matkins have worked
28 diligently since the Receiver’s appointment to preserve and protect the assets of the

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

8 **III. CONCLUSION.**

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

- 10 1. Approving Allen Matkins’ fees for the Application Period of
- 11 \$156,737.70;
- 12 2. Authorizing and directing the Receiver to pay 80% of approved fees, or
- 13 \$125,390.16, from the assets of the Receivership Entities;
- 14 3. Authorizing and directing the Receiver to pay \$827,910.45 in approved
- 15 fees for the Chicago Title litigation and associated appeals;
- 16 4. Approving Allen Matkins’ costs in the amount of \$7,857.26, and
- 17 authorizing and directing the Receiver to reimburse such costs in full; and
- 18 5. For such other and further relief as the Court deems appropriate.

19
20 Dated: March 4, 2026

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	12

EXHIBIT A

EXHIBIT A

01/16/26 14:38:00 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: 10/17/25 Matter Name: SEC v. Champion-Cain - General Receivers
 Proforma Number: 1381783
 Client/Matter Joint Group # 378827-1 Client Matter Number:

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

Trans Date	Index	Description of Service Rendered	Timekeeper	Hours	Fees	Sum	Circle	Action		
07/30/25	10167597	Analysis and determination of document productions.	Peng, Simona	0.50	204.75	204.75	WO	HD	TR	_____
09/30/25	10246681	Communications with SBA counsel regarding Champion-Cain litigation in ND Cal (.4) discuss same with Receiver (.3)	Fates, Edward (Ted)	0.70	614.25	819.00	WO	HD	TR	_____
10/01/25	10251951	Call with SBA counsel regarding litigation against SBA initiated by Champion-Cain and related issues (.4) discuss same with Receiver (.2)	Fates, Edward (Ted)	0.60	526.50	1,345.50	WO	HD	TR	_____
11/19/25	10317074	Review and respond to emails and research regarding ownership of property at 13880 Davenport Ave.	Kaup, John	0.20	81.90	1,427.40	WO	HD	TR	_____
12/16/25	10350501	Respond to inquiries from SBA regarding unpaid loans and Champion-Cain prison settlement funds	Fates, Edward (Ted)	0.50	438.75	1,866.15	WO	HD	TR	_____

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

01/16/26 14:38:00 PROFORMA STATEMENT FOR MATTER 378827.00002 (Krista Freitag, as Receiver for ANI Deve) (SEC v. Champion-Cain - General Receivers)

Trans Date	Index	Type	Quantity	Amt				
07/07/25	2958139	DCSRCH – Document Search - PACER - Usage 2nd QTR	0.00	2.10	WO	HD	TR	_____
07/07/25	2958140	DCSRCH – Document Search - PACER - Usage 2nd QTR	0.00	13.30	WO	HD	TR	_____
07/07/25	2958141	DCSRCH – Document Search - PACER - Usage 2nd QTR	0.00	1.00	WO	HD	TR	_____
07/15/25	2944939	MSNGR – First Legal Network - SDSC-SAN DIEGO; REQUEST FOR DISMISSAL; PROPOSED ORDER	0.00	58.50	WO	HD	TR	_____
07/16/25	2947867	COURT – Other Court Charges - Pamela Lewis - SD SUPERIOR CRT ROA - Minute Order.	0.00	2.00	WO	HD	TR	_____
07/31/25	2950054	EDISC – Sandline Discovery LLC - Everlaw eDiscovery technology and services for July 2025	0.00	876.00	WO	HD	TR	_____
08/29/25	2961497	FILING – Filing Fees - Pamela Lewis - COURTS/USDC-CAS - New case filing	0.00	405.00	WO	HD	TR	_____
08/31/25	2957228	EDISC – Sandline Discovery LLC - Everlaw eDiscovery technology and services for August 2025	0.00	876.00	WO	HD	TR	_____
09/02/25	2958404	MSNGR – First Legal Network - First Legal, Deliver Courtesy	0.00	22.75	WO	HD	TR	_____
09/02/25	2958405	FILING – First Legal Network - San Diego County Recorder, Notice of Pendency of Action (Lis Pendens)	0.00	137.95	WO	HD	TR	_____
09/03/25	2958406	POS – First Legal Network - Sarah Christine Peterson, Summons; Complaint; Notice of Recordation; Notice of Pendency	0.00	625.90	WO	HD	TR	_____
09/03/25	2958407	POS – First Legal Network - Del Mar Capital Investors LLC, Summons; Complaint; Notice of Pendency; Notice of Recordation	0.00	202.26	WO	HD	TR	_____
09/03/25	2958408	POS – First Legal Network - Claire Lauren Peterson, Summons; Complaint; Notice of Pendency; Notice of Recordation	0.00	244.50	WO	HD	TR	_____
09/12/25	2972390	INV – First Legal Investigations - Surveillance - SARAH CHRISTINE PETERSON - 09/10/2025	0.00	1,162.75	WO	HD	TR	_____
09/30/25	2962584	EDISC – Sandline Discovery LLC - Everlaw eDiscovery technology and services for September 2025	0.00	744.00	WO	HD	TR	_____
10/02/25	2960017	FILING – One Legal – Filing fee for Superior Court of California, San Diego County, Proposed Order, Request for Dismissal of Party, Cause of Action, or Cross-Complaint	0.00	22.70	WO	HD	TR	_____

01/16/26 14:38:00 PROFORMA STATEMENT FOR MATTER 378827.00002 (Krista Freitag, as Receiver for ANI Deve) (SEC v. Champion-Cain - General Receivers)

10/07/25	2972179	DCSRCH – Document Search - PACER - Usage 3rd QTR	0.00	0.30	WO	HD	TR	_____
10/07/25	2972180	DCSRCH – Document Search - PACER - Usage 3rd QTR	0.00	0.30	WO	HD	TR	_____
10/07/25	2972181	DCSRCH – Document Search - PACER - Usage 3rd QTR	0.00	1.30	WO	HD	TR	_____
10/07/25	2972182	DCSRCH – Document Search - PACER - Usage 3rd QTR	0.00	0.20	WO	HD	TR	_____
10/07/25	2972183	DCSRCH – Document Search - PACER - Usage 3rd QTR	0.00	0.50	WO	HD	TR	_____
10/07/25	2972184	DCSRCH – Document Search - PACER - Usage 3rd QTR	0.00	0.40	WO	HD	TR	_____
10/09/25	2960845	FILING – One Legal – Filing fee for Superior Court of California, San Diego County, Abstract of Judgment	0.00	60.50	WO	HD	TR	_____
10/10/25	2962434	FILING – First Legal Network - SAN DIEGO COUNTY RECORDER; ABSTRACT OF JUDGMENT	0.00	134.95	WO	HD	TR	_____
10/17/25	2962034	FILING – One Legal – Filing fee for Superior Court of California, San Diego County, Application and Order for Appearance and Examination	0.00	80.50	WO	HD	TR	_____
10/28/25	2967351	POS – Process of Service - Nationwide Legal LLC - Kim Peterson, APPLICATION AND ORDER FOR APPEARANCE AND EXAMINATION JUDGMENT CREDITOR'S REQUESTS FOR PRODUCTION OF DOCUMENTS TO JUDGMENT DEBTOR KIM H. PETERSON (SET ONE) JUDGMENT CREDITOR'S SPECIAL INTERROGATORIES TO JUDGMENT DEBTOR KIM H. PETERSON (SET ONE)	0.00	190.25	WO	HD	TR	_____
10/31/25	2966355	EDISC – Sandline Discovery LLC - Everlaw eDiscovery technology and services for October 2025	0.00	744.00	WO	HD	TR	_____
11/07/25	2966657	DCSRCH – First Legal Network - USDC - San Diego, Certified Abstract of Judgment	0.00	112.92	WO	HD	TR	_____
11/07/25	2966658	FILING – First Legal Network - San Diego County Recorder, Certified Abstract of Judgment	0.00	39.95	WO	HD	TR	_____
11/10/25	2966660	FILING – First Legal Network - San Diego County Recorder, Certified Abstract of Judgment	0.00	81.25	WO	HD	TR	_____
11/11/25	2966661	FILING – First Legal Network - San Diego County Recorder, Certified Abstract of Judgment	0.00	168.25	WO	HD	TR	_____
11/12/25	2966588	MSNGR – Federal Express - Ship To: Clerk, Supreme Court of the U - Attn Admissions Office	0.00	33.24	WO	HD	TR	_____

01/16/26 14:38:00 PROFORMA STATEMENT FOR MATTER 378827.00002 (Krista Freitag, as Receiver for ANI Deve) (SEC v. Champion-Cain - General Receivers)

11/21/25	2968696	MSNGR – Federal Express - Ship To: Clerk, Supreme Court of the U - Attn Admissions Office	0.00	33.24	WO	HD	TR	_____
11/25/25	2968704	MSNGR – Federal Express - Ship To: Pamela Lewis - Allen Matkins	0.00	34.50	WO	HD	TR	_____
11/30/25	2972430	EDISC – Sandline Discovery LLC - Everlaw eDiscovery technology and services for November 2025	0.00	744.00	WO	HD	TR	_____

Proforma Summary

Timekeeper

Number	Timekeeper	Hours	Rate	Amounts
000820	Kaup, John	0.20	409.50	81.90
001665	Fates, Edward (Ted)	1.80	877.50	1,579.50
002307	Peng, Simona	0.50	409.50	204.75
				\$1,866.15
Subtotal Fees				\$1,866.15
Discount				0.00
Total Fees				1,866.15
Total Disbursements				7,857.26

Attorney Billing Instructions

<input type="checkbox"/> BILL ALL	<input type="checkbox"/> Hold
<input type="checkbox"/> BILL FEES ONLY	<input type="checkbox"/> Write Off
<input type="checkbox"/> BILL COST ONLY	<input type="checkbox"/> Transfer All

Billing Instructions

expires 6/30/2026: 10% off standard rates (automatic); no text editing; copies @ .10

Account Summary – As Of 01/16/26

	Fiscal YTD			Calendar YTD			LTD		
	Total	Fees	Disb.	Total	Fees	Disb.	Total	Fees	Disbursements
Worked	1,866.15	1,866.15	0.00	0.00	0.00	0.00	610,933.50	101,192.85	509,740.65
Unbilled Adj	0.00	0.00	0.00	0.00	0.00	0.00	11,581.20	0.45	11,580.75
Billed	27,629.24	6,444.00	21,185.24	0.00	0.00	0.00	99,326.25	99,326.25	501,883.39
Collected	27,629.24	6,444.00	21,185.24	0.00	0.00	0.00	584,234.64	99,326.25	484,908.39
AR Write Off	0.00	0.00	0.00	0.00	0.00	0.00	16,975.00	0.00	16,975.00
Total		Fees	Costs						

01/16/26 14:38:00 PROFORMA STATEMENT FOR MATTER 378827.00002 (Krista Freitag, as Receiver for ANI Deve) (SEC v. Champion-Cain - General Receivers)

WIP	-7,892.62	1,866.15	-9,758.77
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

01/16/26 14:38:01 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: 10/17/25 Matter Name: SEC v. Champion-Cain - Reporting
 Proforma Number: 1381783
 Client/Matter Joint Group # 378827-1 Client Matter Number:

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

Trans Date	Index	Description of Service Rendered	Timekeeper	Hours	Fees	Sum	Circle	Action		
08/18/25	10193033	Analyze and revise Receiver's 24th interim report (1.1) discuss same with Receiver (.2) meet and confer communications with SEC counsel (.1)	Fates, Edward (Ted)	1.40	1,228.50	1,228.50	WO	HD	TR	_____
08/26/25	10202680	Follow up meet and confer communications with SEC counsel re: Receiver's 24th interim report	Fates, Edward (Ted)	0.20	175.50	1,404.00	WO	HD	TR	_____
09/03/25	10212099	Communications with SEC counsel (.1) finalize 24th interim report for filing (.2)	Fates, Edward (Ted)	0.30	263.25	1,667.25	WO	HD	TR	_____
12/08/25	10339489	Work on Receiver's 25th interim report (1.1) discuss same with Receiver (.2) meet and confer communications with SEC counsel (.2)	Fates, Edward (Ted)	1.50	1,316.25	2,983.50	WO	HD	TR	_____

Proforma Summary

Timekeeper Number	Timekeeper	Hours	Rate	Amounts
001665	Fates, Edward (Ted)	3.40	877.50	2,983.50
		3.40		\$2,983.50
Subtotal Fees				\$2,983.50

01/16/26 14:38:01 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
Discount				0.00
Total Fees				2,983.50
Total Disbursements				0.00

Attorney Billing Instructions

<input type="checkbox"/> BILL ALL	<input type="checkbox"/> Hold
<input type="checkbox"/> BILL FEES ONLY	<input type="checkbox"/> Write Off
<input type="checkbox"/> BILL COST ONLY	<input type="checkbox"/> Transfer All

Billing Instructions

expires 6/30/2026: 10% off standard rates (automatic); no text editing; copies @ .10

Account Summary – As Of 01/16/26

	Fiscal YTD			Calendar YTD			LTD		
	Total	Fees	Disb.	Total	Fees	Disb.	Total	Fees	Disbursements
Worked	3,334.50	3,334.50	0.00	351.00	351.00	0.00	99,842.85	99,842.85	0.00
Unbilled Adj	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00
Billed	7,732.80	7,732.80	0.00	0.00	0.00	0.00	96,508.35	96,508.35	0.00
Collected	7,732.80	7,732.80	0.00	0.00	0.00	0.00	96,508.35	96,508.35	0.00
AR Write Off	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00
WIP	3,334.50	3,334.50	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

01/16/26 14:38:01 PROFORMA STATEMENT FOR MATTER 378827.00004 (Krista Freitag, as Receiver for ANI Deve) (SEC v. Champion-Cain - Reporting)

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

01/16/26 14:38:02 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: 10/17/25 Matter Name: SEC v. Champion-Cain - Operations & Asse
 Proforma Number: 1381783
 Client/Matter Joint Group # 378827-1 Client Matter Number:

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

Trans Date	Index	Description of Service Rendered	Timekeeper	Hours	Fees	Sum	Circle	Action	
07/10/25	10159077	Analyze and advise on amendment to Membership Interest Purchase Agreement for Casa del Zorro to extend closing deadline (.4) communications with G. Rodriguez re: same (.2)	Fates, Edward (Ted)	0.60	526.50	526.50	WO	HD	TR
08/12/25	10184920	Discuss closing of sale of membership interest in Casa del Zorro with Receiver	Fates, Edward (Ted)	0.20	175.50	702.00	WO	HD	TR

Proforma Summary

Timekeeper Number	Timekeeper	Hours	Rate	Amounts
001665	Fates, Edward (Ted)	0.80	877.50	702.00
		0.80		\$702.00
	Subtotal Fees			\$702.00
	Discount			0.00
	Total Fees			702.00
	Total Disbursements			0.00

Attorney Billing Instructions

01/16/26 14:38:02 PROFORMA STATEMENT FOR MATTER 378827.00005 (Krista Freitag, as Receiver for ANI Deve) (SEC v. Champion-Cain - Operations & Asse)

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

Billing Instructions

expires 6/30/2026: 10% off standard rates (automatic); no text editing; copies @ .10

Account Summary – As Of 01/16/26

	Fiscal YTD			Calendar YTD			LTD		
	Total	Fees	Disb.	Total	Fees	Disb.	Total	Fees	Disbursements
Worked	702.00	702.00	0.00	0.00	0.00	0.00	755,632.80	755,632.80	0.00
Unbilled Adj	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00
Billed	11,035.35	11,035.35	0.00	0.00	0.00	0.00	754,930.80	754,930.80	0.00
Collected	11,035.35	11,035.35	0.00	0.00	0.00	0.00	754,930.80	754,930.80	0.00
AR Write Off	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00
	Total	Fees	Costs						
WIP	702.00	702.00	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

01/16/26 14:38:03 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: 10/17/25 Matter Name: SEC v. Champion-Cain - Claims & Distribu
 Proforma Number: 1381783
 Client/Matter Joint Group # 378827-1 Client Matter Number:

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

Trans Date	Index	Description of Service Rendered	Timekeeper	Hours	Fees	Sum	Circle	Action		
07/02/25	10134582	Respond to inquiry from counsel for investor	Fates, Edward (Ted)	0.30	263.25	263.25	WO	HD	TR	_____
08/11/25	10182641	Analyze and revise assignment documents for claimant requests to assign claims to family members / related parties (.7) respond to inquiry from investor regarding distributions from receivership (.2)	Fates, Edward (Ted)	0.90	789.75	1,053.00	WO	HD	TR	_____
08/18/25	10191970	Respond to inquiry from investor regarding receivership distributions	Fates, Edward (Ted)	0.30	263.25	1,316.25	WO	HD	TR	_____
09/10/25	10223313	Call from investor re: status of litigation matters and distributions	Fates, Edward (Ted)	0.30	263.25	1,579.50	WO	HD	TR	_____
10/01/25	10253108	Communications with investor regarding Peterson-related litigation and timing of future distributions	Fates, Edward (Ted)	0.40	351.00	1,930.50	WO	HD	TR	_____

Proforma Summary

01/16/26 14:38:03 PROFORMA STATEMENT FOR MATTER 378827.00006 (Krista Freitag, as Receiver for ANI Deve) (SEC v. Champion-Cain - Claims & Distribu)

Timekeeper

Number	Timekeeper	Hours	Rate	Amounts
001665	Fates, Edward (Ted)	2.20	877.50	1,930.50
		<u>2.20</u>		<u>\$1,930.50</u>
Subtotal Fees				\$1,930.50
Discount				0.00
Total Fees				1,930.50
Total Disbursements				0.00

Attorney Billing Instructions

<input type="checkbox"/> BILL ALL	<input type="checkbox"/> Hold
<input type="checkbox"/> BILL FEES ONLY	<input type="checkbox"/> Write Off
<input type="checkbox"/> BILL COST ONLY	<input type="checkbox"/> Transfer All

Billing Instructions

expires 6/30/2026: 10% off standard rates (automatic); no text editing; copies @ .10

Account Summary – As Of 01/16/26

	Fiscal YTD			Calendar YTD			LTD		
	Total	Fees	Disb.	Total	Fees	Disb.	Total	Fees	Disbursements
Worked	2,106.00	2,106.00	0.00	175.50	175.50	0.00	797,772.15	797,772.15	0.00
Unbilled Adj	0.00	0.00	0.00	0.00	0.00	0.00	3,328.23	6.03	3,322.20
Billed	13,976.19	13,976.19	0.00	0.00	0.00	0.00	795,672.18	795,672.18	0.00
Collected	13,976.19	13,976.19	0.00	0.00	0.00	0.00	795,672.18	795,672.18	0.00
AR Write Off	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00
WIP Balance	2,106.00	2,106.00	0.00						
AR Balance	0.00	0.00	0.00						
Unalloc Payment	0.00								
Client Trust Balance	0.00								

Billing Address

01/16/26 14:38:03 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

01/16/26 14:38:04 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 Matter #: 378827.00007 Client Name: Krista Freitag, as Receiver for ANI Deve
 (Ted)
 Date of Last Billing: 10/17/25 Matter Name: SEC v. Champion-Cain - Third Party Recov
 Proforma Number: 1381783
 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		
07/01/25	10131129	Communications with E. Churilla and broker regarding list price reduction for TX property	Fates, Edward (Ted)	0.30	263.25	263.25	WO	HD	TR	_____
07/17/25	10150954	Communications with G. Rodriguez and broker for Churilla property in TX	Fates, Edward (Ted)	0.40	351.00	614.25	WO	HD	TR	_____
07/18/25	10151779	Communications with E. Churilla and TX broker re: open house for listed property (.2) discuss concerns re: same with Receiver and G. Rodriguez (.3)	Fates, Edward (Ted)	0.50	438.75	1,053.00	WO	HD	TR	_____
07/23/25	10158155	Communications with Churilla and TX broker regarding open house for Churilla property (.2) discuss same with G. Rodriguez (.2)	Fates, Edward (Ted)	0.40	351.00	1,404.00	WO	HD	TR	_____
07/29/25	10165216	Discuss issues and strategy for sale process for Churilla property in TX with Receiver (.3) communications with Churilla and Broker re: extension of listing agreement (.2)	Fates, Edward (Ted)	0.50	438.75	1,842.75	WO	HD	TR	_____

01/16/26 14:38:04 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		
08/05/25	10177046	Communications with Receiver and G. Rodriguez regarding condition of Churilla property in TX	Fates, Edward (Ted)	0.40	351.00	2,193.75	WO	HD	TR	_____
08/08/25	10180433	Communications with broker for Texas property (.2) update Receiver and G. Rodriguez re: same (.3)	Fates, Edward (Ted)	0.50	438.75	2,632.50	WO	HD	TR	_____
08/12/25	10184864	Discuss potential next steps regarding listing for Churilla property in TX with Receiver	Fates, Edward (Ted)	0.20	175.50	2,808.00	WO	HD	TR	_____
08/19/25	10196455	Discuss issues and next steps for marketing / sale efforts for Churilla property in TX with Receiver (.3) discuss next steps re: same with G. Rodriguez (.2) analyze Texas homestead exemption (.4)	Fates, Edward (Ted)	0.90	789.75	3,597.75	WO	HD	TR	_____
08/22/25	10204156	Communications with E. Churilla regarding interest in TX property	Fates, Edward (Ted)	0.20	175.50	3,773.25	WO	HD	TR	_____
08/27/25	10203317	Analyze communication from broker in TX regarding listing for Churilla property and discuss same with Receiver	Fates, Edward (Ted)	0.20	175.50	3,948.75	WO	HD	TR	_____
08/28/25	10205273	Communications with Receiver and G. Rodriguez re: next steps for Churilla property in TX	Fates, Edward (Ted)	0.20	175.50	4,124.25	WO	HD	TR	_____
08/29/25	10207066	Call with Receiver and G. Rodriguez to discuss strategy and next steps for recovery on Illa Designs loan and sale of Churilla property in TX	Fates, Edward (Ted)	0.40	351.00	4,475.25	WO	HD	TR	_____

01/16/26 14:38:04 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		
09/02/25	10214855	Communications with E. Churilla re: broker in TX and next steps (.2) communications with G. Rodriguez re: same (.2)	Fates, Edward (Ted)	0.40	351.00	4,826.25	WO	HD	TR	_____
09/09/25	10221231	Communications with G. Rodriguez re: new broker in TX for Churilla property	Fates, Edward (Ted)	0.20	175.50	5,001.75	WO	HD	TR	_____
10/02/25	10252939	Discuss strategy and next steps on listing of Churilla in TX, cleaning, showing and related issues with G. Rodriguez	Fates, Edward (Ted)	0.40	351.00	5,352.75	WO	HD	TR	_____
11/05/25	10297485	Discuss issues and next steps relating to listing and marketing of Churilla property in TX with Receiver and G. Rodriguez	Fates, Edward (Ted)	0.40	351.00	5,703.75	WO	HD	TR	_____
11/12/25	10306981	Communications with E. Churilla re: settlement and potential new listing agreement for TX property	Fates, Edward (Ted)	0.30	263.25	5,967.00	WO	HD	TR	_____
11/20/25	10317446	Call / emails with G. Rodriguez and E. Churilla re: proposal and plan for marketing and sale of TX property (1.1) discuss same with G. Rodriguez (.3)	Fates, Edward (Ted)	1.40	1,228.50	7,195.50	WO	HD	TR	_____
12/03/25	10333876	Follow up communications with E. Churilla re: marketing and sale process for TX property	Fates, Edward (Ted)	0.40	351.00	7,546.50	WO	HD	TR	_____
12/11/25	10343681	Follow up communications with E. Churilla re: new listing agreement, amendment to settlement agreement and marketing plan / timeline (.6) advise Receiver re: same and minute order requiring status report (.4)	Fates, Edward (Ted)	1.00	877.50	8,424.00	WO	HD	TR	_____

01/16/26 14:38:04 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
12/12/25	10345040	Communications with G. Rodriguez re: next steps for new listing agreement for TX property and related issues	Fates, Edward (Ted)	0.40	351.00	8,775.00	WO	HD TR
12/15/25	10347922	Communications with G. Rodriguez re: Churilla and broker issues	Fates, Edward (Ted)	0.20	175.50	8,950.50	WO	HD TR
12/16/25	10350564	Communications with G. Rodriguez and E. Churilla re: listing agreement for TX property and related issues	Fates, Edward (Ted)	0.50	438.75	9,389.25	WO	HD TR
12/22/25	10357789	Communications with G. Rodriguez (.2) analyze email from broker and advise on next steps (.4)	Fates, Edward (Ted)	0.60	526.50	9,915.75	WO	HD TR
12/23/25	10358753	Advise Receiver on issues relating to payments from bankruptcy estate for clawback claim	Fates, Edward (Ted)	0.20	175.50	10,091.25	WO	HD TR
12/23/25	10360135	Review notice from bankruptcy of James Lee Covington	Kaup, John	0.10	40.95	10,132.20	WO	HD TR

Proforma Summary

Timekeeper		Hours	Rate	Amounts
000820	Kaup, John	0.10	409.50	40.95
001665	Fates, Edward (Ted)	11.50	877.50	10,091.25
		11.60		\$10,132.20
Subtotal Fees				\$10,132.20
Discount				0.00
Total Fees				10,132.20
Total Disbursements				0.00

01/16/26 14:38:04 PROFORMA STATEMENT FOR MATTER 378827.00007 (Krista Freitag, as Receiver for ANI Deve) (SEC v. Champion-Cain - Third Party Recov)

Attorney Billing Instructions

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

Billing Instructions

expires 6/30/2026: 10% off standard rates (automatic); no text editing; copies @ .10
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Account Summary – As Of 01/16/26

	Fiscal YTD			Calendar YTD			LTD		
	Total	Fees	Disb.	Total	Fees	Disb.	Total	Fees	Disbursements
Worked	11,623.95	11,623.95	0.00	1,491.75	1,491.75	0.00	1,078,353.90	1,078,353.90	0.00
Unbilled Adj	0.00	0.00	0.00	0.00	0.00	0.00	78.49	68.49	10.00
Billed	25,534.35	25,534.35	0.00	0.00	0.00	0.00	1,066,664.70	1,066,664.70	0.00
Collected	25,534.35	25,534.35	0.00	0.00	0.00	0.00	1,066,664.70	1,066,664.70	0.00
AR Write Off	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00
	Total	Fees	Costs						
WIP	11,623.95	11,623.95	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

01/16/26 14:38:06 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: 10/17/25 Matter Name: SEC v. Champion-Cain - Employment/Fees
 Proforma Number: 1381783
 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		
08/22/25	10197107	Revisions to Receiver's 15th interim fee application (.4) discuss same with Receiver (.1)	Fates, Edward (Ted)	0.50	438.75	438.75	WO	HD	TR	_____
08/25/25	10200041	Meet and confer communications with SEC counsel regarding 15th interim fee applications	Fates, Edward (Ted)	0.20	175.50	614.25	WO	HD	TR	_____
09/04/25	10246291	Communications with Receiver re: 15th interim fee application (.2) finalize same (.3)	Fates, Edward (Ted)	0.50	438.75	1,053.00	WO	HD	TR	_____

Proforma Summary

Timekeeper Number	Timekeeper	Hours	Rate	Amounts
001665	Fates, Edward (Ted)	1.20	877.50	1,053.00
		<u>1.20</u>		<u>\$1,053.00</u>
Subtotal Fees				\$1,053.00
Discount				0.00
Total Fees				1,053.00
Total Disbursements				0.00

01/16/26 14:38:06 PROFORMA STATEMENT FOR MATTER 378827.00009 (Krista Freitag, as Receiver for ANI Deve) (SEC v. Champion-Cain - Employment/Fees)

Attorney Billing Instructions

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

Billing Instructions

expires 6/30/2026: 10% off standard rates (automatic); no text editing; copies @ .10
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Account Summary – As Of 01/16/26

	Fiscal YTD			Calendar YTD			LTD		
	Total	Fees	Disb.	Total	Fees	Disb.	Total	Fees	Disbursements
Worked	1,053.00	1,053.00	0.00	0.00	0.00	0.00	21,429.45	21,429.45	0.00
Unbilled Adj	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00
Billed	1,933.20	1,933.20	0.00	0.00	0.00	0.00	20,376.45	20,376.45	0.00
Collected	1,933.20	1,933.20	0.00	0.00	0.00	0.00	20,376.45	20,376.45	0.00
AR Write Off	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00
	Total	Fees	Costs						
WIP	1,053.00	1,053.00	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

03/02/26 13:16:47 PROFORMA STATEMENT FOR MATTER 378827.00013 (Krista Freitag, as Receiver for ANI Deve) (Chicago Title Litigation)

Preliminary Billing Form

Billing Atty: 001665 - Fates, Edward Matter #: 378827.00013 Client Name: Krista Freitag, as Receiver for ANI Deve
 (Ted)
 Date of Last Billing: Matter Name: Chicago Title Litigation
 Proforma Number: 1389948
 Client/Matter Joint Group # 378827-1 Client Matter Number:

Fees for Matter 378827.00013.(Chicago Title Litigation)

Trans Date	Index	Description of Service Rendered	Timekeeper	Hours	Fees	Sum	Circle	Action		
12/13/21	8683839	review and analysis of order granting permission to sue CT and emails regarding same.	Hartney, Mark	0.80	669.60	669.60	WO	HD	TR	_____
12/13/21	8870392	Analyze order conditionally granting authority to sue CTC (.4)	Fates, Edward (Ted)	0.40	257.40	927.00	WO	HD	TR	_____
12/14/21	8664350	Attend deposition of Betty Elixman in Kim Funding v. CTC case (.9) analyze next steps re: revisions to and filing of state court complaint against CTC (.4) communications with counsel for Ovation and counsel for CTC re: scheduling of Champion-Cain deposition (.3)	Fates, Edward (Ted)	1.60	1,029.60	1,956.60	WO	HD	TR	_____
12/14/21	8665974	Work on issues related to the approach to the Receiver complaint in light of Court's order, conferences with Receiver/counsel and follow-up (.1.1). Research/analysis related to the claims of breach of fiduciary duty/punitive damages and follow-up (1.8).	Zaro, David	2.90	2,427.30	4,383.90	WO	HD	TR	_____

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Fees for Matter 378827.00013.(Chicago Title Litigation)

Trans Date	Index	Description of Service Rendered	Timekeeper	Hours	Fees	Sum	Circle	Action		
12/14/21	8683604	Review order to pursue claims against Chicago Title (.5). Strategy and correspondence regarding same (.3).	Griffin, Peter	0.80	410.40	4,794.30	WO	HD	TR	_____
12/15/21	8665380	Analyze request from counsel for CTC for updated investor loss information for mediation (.6) advise Receiver re: same (.5) respond to counsel for CTC re: same (.2) attend deposition of E. Kezar in Ovation v. CTC case (4.6) address issues re: revisions to CTC complaint and filing of same in state court (.3)	Fates, Edward (Ted)	6.20	3,989.70	8,784.00	WO	HD	TR	_____
12/15/21	8669702	Evaluate issues related to damages, analysis of the CTC request for information, email to Receiver and counsel/follow-up meeting (1.4). Attend meeting with Receiver and counsel to address the complaint/mediation and damages (.8). Several calls and emails related to the damages, the research related to damages (.7).	Zaro, David	2.90	2,427.30	11,211.30	WO	HD	TR	_____
12/15/21	8683934	prepare for and attend conference call with Receiver regarding Chicago Title lawsuit.	Hartney, Mark	0.60	502.20	11,713.50	WO	HD	TR	_____
12/15/21	8683939	research and analysis of case law cited in Judge Burns order regarding CT lawsuit.	Hartney, Mark	1.30	1,088.10	12,801.60	WO	HD	TR	_____
12/15/21	8683959	review prior draft of CT complaint and evaluate strategy for revising.	Hartney, Mark	0.70	585.90	13,387.50	WO	HD	TR	_____
12/15/21	8683968	conference call with plaintiff counsel regarding Cain deposition and approach	Hartney, Mark	0.70	585.90	13,973.40	WO	HD	TR	_____

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12/16/21	8666762	Advise on issues relating to planning and preparation for 1/24 global mediation (.7) analyze issues regarding 12/17 CMC in state court cases and request to set trial date, analyze CTC case management statement (.8) discuss same with counsel for K. Peterson (.3) advise Receiver on issues relating to reported investor settlement in Allred case (.4) analyze tentative rulings from state court on motion for summary adjudication and motion for trial preference (.2)	Fates, Edward (Ted)	2.40	1,544.40	15,517.80	WO	HD	TR	_____
12/16/21	8668007	Review and respond to emails regarding state court hearing; check for latest case activity; review and forward tentative rulings.	Kaup, John	0.90	283.50	15,801.30	WO	HD	TR	_____
12/16/21	8669745	Further review/analysis of the issues as to the mediation per email as well as the Receiver claims, approach to damages/liability and emails/advice to Receiver counsel (1.0). Evaluate the Court's order on the motion for summary judgment, follow-up with counsel (.4).	Zaro, David	1.40	1,171.80	16,973.10	WO	HD	TR	_____
12/16/21	8670837	Review and analyze Court's order authorizing Receiver to pursue Chicago Title claims	Pham, Matt D.	0.20	82.80	17,055.90	WO	HD	TR	_____
12/16/21	8670839	Confer with Ted Fates regarding background of dispute with Chicago Title and procedural history of litigation with Chicago Title	Pham, Matt D.	0.80	331.20	17,387.10	WO	HD	TR	_____

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12/16/21	8670840	Review and analyze current draft of complaint against Chicago Title; make notes regarding potential revisions to such draft	Pham, Matt D.	1.90	786.60	18,173.70	WO	HD	TR	_____
12/16/21	8670841	Begin revising current draft of complaint against Chicago Title	Pham, Matt D.	1.80	745.20	18,918.90	WO	HD	TR	_____
12/17/21	8668020	Analyze confidentiality designations for J. Goodman deposition transcript from counsel for CTC (.3) analyze and advise on next steps relating to claims against CTC and hearing in state court (.4) analyze request for investor contact information from putative class counsel in Allred v. CTC case (.5) advise Receiver re: same (.3)	Fates, Edward (Ted)	1.50	965.25	19,884.15	WO	HD	TR	_____
12/17/21	8669479	Review and respond to emails and conference call regarding state court litigation and hearing before Judge Medel; analyze and forward rulings regarding failure to join a necessary party.	Kaup, John	1.50	472.50	20,356.65	WO	HD	TR	_____
12/17/21	8671503	Work on issues related to the case management conference, advice to counsel regarding strategy (.4). Follow-up call to further address mediation issues (.5). Evaluate proposed approach to settlement; email regarding investor's counsel proposal, advice to Receiver and counsel (.5)l. Advice related to complaint (.5).	Zaro, David	1.90	1,590.30	21,946.95	WO	HD	TR	_____

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12/17/21	8683544	prepare for and attend (virtually) hearing on motion for summary judgment and status conference.	Hartney, Mark	2.60	2,176.20	24,123.15	WO	HD	TR	_____
12/17/21	8683634	review and respond to emails regarding request for investor information from "class" counsel.	Hartney, Mark	0.40	334.80	24,457.95	WO	HD	TR	_____
12/19/21	8670854	Review and analyze complaint and first amended complaint of Ovation against Chicago Title for potential inclusion of allegations in Receiver's complaint against Chicago Title	Pham, Matt D.	1.80	745.20	25,203.15	WO	HD	TR	_____
12/19/21	8670855	Perform legal research regarding inapplicability of in pari delicto defense against receiver to determine how to preemptively address such issue in complaint	Pham, Matt D.	1.80	745.20	25,948.35	WO	HD	TR	_____
12/19/21	8670860	Revise complaint against Chicago Title - allegations regarding Chicago Title's participation/assistance	Pham, Matt D.	1.50	621.00	26,569.35	WO	HD	TR	_____
12/19/21	8670861	Revise complaint against Chicago Title - allegations regarding liquor license loan program	Pham, Matt D.	1.20	496.80	27,066.15	WO	HD	TR	_____
12/19/21	8670865	Revise complaint against Chicago Title - allegations regarding Chicago Title's conduct	Pham, Matt D.	1.40	579.60	27,645.75	WO	HD	TR	_____
12/20/21	8670606	Check for latest activity in lead Kim Funding case.	Kaup, John	0.10	31.50	27,677.25	WO	HD	TR	_____

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12/20/21	8671549	Analysis of Receiver causes of action, meeting with counsel to address standing issues, follow-up brief research related to issues/complaint (.7). Evaluate investor settlement issues and pending offers (.2)	Zaro, David	0.90	753.30	28,430.55	WO	HD	TR	_____
12/20/21	8681956	Continue drafting complaint against Chicago Title - allegations regarding breach of fiduciary duty and aiding and abetting breach of fiduciary duty	Pham, Matt D.	1.70	703.80	29,134.35	WO	HD	TR	_____
12/20/21	8681957	Continue drafting complaint against Chicago Title - allegations regarding aiding and abetting fraud	Pham, Matt D.	1.10	455.40	29,589.75	WO	HD	TR	_____
12/20/21	8681965	Continue drafting complaint against Chicago Title - general allegations	Pham, Matt D.	1.90	786.60	30,376.35	WO	HD	TR	_____
12/21/21	8672163	Check for latest activity in Kim Funding state court litigation	Kaup, John	0.10	31.50	30,407.85	WO	HD	TR	_____
12/21/21	8676053	Evaluate email related to possible investor settlements, the mediation and follow-up conference call with Receiver counsel as to response to counsel (.7). Several calls/emails as to CTC requests and email analysis as to damages (1.2).	Zaro, David	1.90	1,590.30	31,998.15	WO	HD	TR	_____
12/21/21	8681994	Continue drafting and revising Chicago Title complaint - allegations regarding loan program/scheme	Pham, Matt D.	1.80	745.20	32,743.35	WO	HD	TR	_____
12/21/21	8681995	Continue drafting and revising Chicago Title complaint - allegations regarding fraudulent nature of loan program	Pham, Matt D.	1.70	703.80	33,447.15	WO	HD	TR	_____

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Fees for Matter 378827.00013.(Chicago Title Litigation)

Trans Date	Index	Description of Service Rendered	Timekeeper	Hours	Fees	Sum	Circle	Action		
12/21/21	8681996	Continue drafting and revising Chicago Title complaint - allegations regarding Chicago Title's participation in scheme	Pham, Matt D.	1.80	745.20	34,192.35	WO	HD	TR	_____
12/21/21	8870398	Analyze CTC/Allred settlement issues and correspondence from counsel for Allred re: same (.5).	Fates, Edward (Ted)	0.50	321.75	34,514.10	WO	HD	TR	_____
12/22/21	8672477	Advise Receiver re: issues relating to request for investor information from counsel for Allred et al. in Allred v. CTC matter (.6) work on response to same (.3)	Fates, Edward (Ted)	0.90	579.15	35,093.25	WO	HD	TR	_____
12/22/21	8673557	Check activity in Kim Funding state court litigation.	Kaup, John	0.10	31.50	35,124.75	WO	HD	TR	_____
12/22/21	8676074	Research/analysis of damage claims, address possible ANI claims and develop strategy (1.3). Call regarding mediation issue with the Receiver and counsel, follow-up regarding same (.4). Calls with Receiver and emails related to the CTC mediation, investor claimants and response (.4).	Zaro, David	2.10	1,757.70	36,882.45	WO	HD	TR	_____
12/22/21	8681997	Continue drafting and revising Chicago Title complaint - allegations regarding Chicago Title's knowledge of scheme	Pham, Matt D.	1.90	786.60	37,669.05	WO	HD	TR	_____
12/22/21	8681999	Continue drafting and revising Chicago Title complaint - allegations regarding Chicago Title's participation	Pham, Matt D.	1.00	414.00	38,083.05	WO	HD	TR	_____

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12/22/21	8682001	Continue drafting and revising Chicago Title complaint - allegations regarding fraudulent nature of scheme, extent of misrepresentations	Pham, Matt D.	1.60	662.40	38,745.45	WO	HD	TR	_____
12/22/21	8682002	Continue drafting and revising Chicago Title complaint - allegations regarding Chicago Title's lack of internal controls and profits from scheme	Pham, Matt D.	1.40	579.60	39,325.05	WO	HD	TR	_____
12/22/21	8682004	Continue drafting and revising Chicago Title complaint - allegations regarding injuries to receivership entities	Pham, Matt D.	1.30	538.20	39,863.25	WO	HD	TR	_____
12/22/21	8682005	Continue drafting and revising Chicago Title complaint - allegations supporting various causes of action	Pham, Matt D.	1.80	745.20	40,608.45	WO	HD	TR	_____
12/22/21	8684139	review and respond to emails regarding request from "class" counsel.	Hartney, Mark	0.40	334.80	40,943.25	WO	HD	TR	_____
12/22/21	8684147	review and respond to email from Judge Denton regarding mediation.	Hartney, Mark	0.40	334.80	41,278.05	WO	HD	TR	_____
12/23/21	8673658	Analyze revisions to complaint against CTC (.7) analyze further correspondence from counsel for Allred re: investor contact information (.3) advise Receiver re: same (.2)	Fates, Edward (Ted)	1.20	772.20	42,050.25	WO	HD	TR	_____
12/23/21	8674762	Check for activity in Kim Funding state court litigation.	Kaup, John	0.10	31.50	42,081.75	WO	HD	TR	_____
12/23/21	8676126	Work on revisions to the draft of the complaint against Chicago Title and further revisions to causes of action and	Zaro, David	3.30	2,762.10	44,843.85	WO	HD	TR	_____

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		narrative (2.6). Several emails related to settlement, advice to counsel and Receiver (.4). Email to/from Receiver related to Chicago Title Company claims and complaint (.3).								
12/23/21	8676130	Address further issues related to purported investor settlements, follow-up emails with Receiver and counsel (.6). Call/email with counsel to address Mr. Goldstein email and court's response (.5).	Zaro, David	1.10	920.70	45,764.55	WO	HD	TR	_____
12/23/21	8684161	review and analysis of revised CT complaint and telephone conference with Zaro regarding same.	Hartney, Mark	2.60	2,176.20	47,940.75	WO	HD	TR	_____
12/27/21	8675479	Revisions to position statement to Judge Goddard re: request from counsel for Allred investors re: investor contact information (.5) call/emails with Judge Denton re: global mediation (.4)	Fates, Edward (Ted)	0.90	579.15	48,519.90	WO	HD	TR	_____
12/27/21	8676713	Check for filings following Case Management Conference in Kim Funding case.	Kaup, John	0.10	31.50	48,551.40	WO	HD	TR	_____
12/27/21	8676802	Several emails, further work/research related to the complaint/Receiver claims (.8). Conferences with Receiver counsel related to the draft complaint, further revisions to same, follow-up (1.6).	Zaro, David	2.40	2,008.80	50,560.20	WO	HD	TR	_____
12/27/21	8676806	Work on draft letter to Magistrate Judge Goddard per Court's request for briefing statement as to Berger claims and	Zaro, David	1.80	1,506.60	52,066.80	WO	HD	TR	_____

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12/27/21	8681774	Prepare for and conduct conference call with Judge Denton regarding mediation.	Hartney, Mark	1.00	837.00	52,903.80	WO	HD	TR	_____
12/27/21	8681779	review and analysis of Zaro edits to complaint and research regarding punitive damages.	Hartney, Mark	3.60	3,013.20	55,917.00	WO	HD	TR	_____
12/27/21	8682011	Phone call with Mark Hartney regarding outstanding issues on Chicago Title complaint	Pham, Matt D.	0.30	124.20	56,041.20	WO	HD	TR	_____
12/28/21	8676338	Communications with counsel and Judge Denton re: global mediation (.3) address issues re: revisions to complaint against CTC (.2)	Fates, Edward (Ted)	0.50	321.75	56,362.95	WO	HD	TR	_____
12/28/21	8676848	Further revisions to the letter, evaluate strategy/email with Receiver counsel (1.1). Further email to the Receiver and counsel related to the draft letter to Judge Goddard regarding BM (.5).	Zaro, David	1.60	1,339.20	57,702.15	WO	HD	TR	_____
12/28/21	8676865	Further analysis, call with counsel related to the coordination among the related actions, discovery and follow-up on the complaint.	Zaro, David	0.80	669.60	58,371.75	WO	HD	TR	_____
12/28/21	8682060	Perform legal research regarding California Escrow Law and review and analyze applicable case law found from such research	Pham, Matt D.	1.90	786.60	59,158.35	WO	HD	TR	_____
12/28/21	8684046	research regarding CT complaint.	Hartney, Mark	1.10	920.70	60,079.05	WO	HD	TR	_____

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12/28/21	8684049	further draft and revise complaint.	Hartney, Mark	4.10	3,431.70	63,510.75	WO	HD	TR	_____
12/29/21	8679903	Evaluate revisions to letter to Judge Goddard regarding Receiver's position. Follow-up on draft with counsel (.2).	Zaro, David	0.90	753.30	64,264.05	WO	HD	TR	_____
12/29/21	8679933	Several calls/emails with counsel related to the draft complaint and mediation issues/strategy (.6). Evaluate the further revisions to draft complaint and analysis of possible legal challenges (1.6).	Zaro, David	2.20	1,841.40	66,105.45	WO	HD	TR	_____
12/29/21	8682075	Review and analyze proposed revisions to Chicago Title complaint from Mark Hartney and David Zaro	Pham, Matt D.	1.00	414.00	66,519.45	WO	HD	TR	_____
12/29/21	8682079	Make additional revisions to Chicago Title complaint	Pham, Matt D.	1.80	745.20	67,264.65	WO	HD	TR	_____
12/29/21	8682084	Continue revising Chicago Title complaint	Pham, Matt D.	1.70	703.80	67,968.45	WO	HD	TR	_____
12/29/21	8682086	Phone call with Mark Hartney regarding outstanding issues with Chicago Title complaint	Pham, Matt D.	0.30	124.20	68,092.65	WO	HD	TR	_____
12/29/21	8682087	Locate and review exemplar documents relating to contracts between receivership entities and Chicago Title	Pham, Matt D.	0.70	289.80	68,382.45	WO	HD	TR	_____
12/29/21	8682089	Make final revisions to draft of Chicago Title complaint	Pham, Matt D.	1.30	538.20	68,920.65	WO	HD	TR	_____

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12/29/21	8684042	further draft and revise CT complaint and email Receiver regarding same.	Hartney, Mark	3.90	3,264.30	72,184.95	WO	HD	TR	_____
12/29/21	8684190	review and revise statement regarding request for investor information.	Hartney, Mark	0.60	502.20	72,687.15	WO	HD	TR	_____
12/30/21	8680019	Evaluate further revisions to the draft complaint (.6). Call with Receiver related tot he global mediation/draft complaint (.5). Call with counsel related to the complaint and the Receiver revisions, follow-up (.8).	Zaro, David	1.90	1,590.30	74,277.45	WO	HD	TR	_____
12/30/21	8680033	Email/call with the Receiver related to Judge Goddard letter as to Berger Montague demand and follow-up (.6). Emails/call with counsel related to the B.M. letter, finalize same (1.0).	Zaro, David	1.60	1,339.20	75,616.65	WO	HD	TR	_____
01/03/22	8681121	Analyze state court rulings in related investor actions against CTC	Fates, Edward (Ted)	0.20	128.70	75,745.35	WO	HD	TR	_____
01/03/22	8682840	Check status of state court investor lawsuits with Chicago Title and update tracking chart; review and respond to emails.	Kaup, John	0.50	157.50	75,902.85	WO	HD	TR	_____
01/03/22	8685577	Call with counsel related to CTC complaint, Receiver comments/strategy (.4). Follow-up on the issues as to the draft complaint, call with counsel (.8).	Zaro, David	1.20	1,004.40	76,907.25	WO	HD	TR	_____
01/03/22	8711406	Review and respond to emails regarding request for statements regarding non-settling parties; review and evaluate email from Galdston regarding same.	Hartney, Mark	1.20	1,004.40	77,911.65	WO	HD	TR	_____

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01/03/22	8711435	Review and analysis of claims from Kim Funding and evaluate impact on CT mediation; review and analysis of motion for summary judgment and other state court filings regarding CT claim in advance of mediation.	Hartney, Mark	3.60	3,013.20	80,924.85	WO	HD	TR	_____
01/04/22	8696064	Review proposed revisions to complaint against CTC and discuss same with with Receiver and counsel (1.9) address communications from counsel for CTC and respond to same (.3)	Fates, Edward (Ted)	2.20	1,415.70	82,340.55	WO	HD	TR	_____
01/04/22	8712815	Prepare for and conduct conference call with client regarding comments to draft complaint; review and analysis of emails regarding CT involvement with ANI; revise complaint.	Hartney, Mark	3.70	3,096.90	85,437.45	WO	HD	TR	_____
01/05/22	8690381	Emails with Receiver and counsel related to the Chicago Title complaint.	Zaro, David	0.40	334.80	85,772.25	WO	HD	TR	_____
01/05/22	8696063	Address issues and strategy for conference call with Judge Goddard re: request for investor contact information from counsel for Allred investors (.3) attend conference call (.5) advise Receiver re: same (.3) advise on revisions to CTC complaint and service issues (.8)	Fates, Edward (Ted)	1.90	1,222.65	86,994.90	WO	HD	TR	_____
01/05/22	8712855	Further revise complaint per K. Freitag comments and email client regarding same.	Hartney, Mark	2.30	1,925.10	88,920.00	WO	HD	TR	_____

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01/06/22	8686719	Prepare for and conduct conference call with counsel for Ovation regarding mediation.	Hartney, Mark	0.80	669.60	89,589.60	WO	HD	TR	_____
01/06/22	8687004	Review emails regarding upcoming mediation.	Kaup, John	0.10	31.50	89,621.10	WO	HD	TR	_____
01/06/22	8690413	Follow-up with counsel/Receiver and evaluate draft of the Receiver's complaint, follow-up with revisions and advice to counsel (1.3). Call/emails related to mediation and strategy approach to claims and split of claims, follow-up (.8).	Zaro, David	2.10	1,757.70	91,378.80	WO	HD	TR	_____
01/06/22	8696061	Analyze and advise on communications from Judicate West re: fee split and logistics for 1/24 mediation (.5) communications with court reporter re: upcoming hearings and depositions (.2) communications with counsel for Ovation re: 1/24 mediation issues (1.2) discuss same with Receiver (.4)	Fates, Edward (Ted)	2.30	1,480.05	92,858.85	WO	HD	TR	_____
01/06/22	8712912	Evaluate state court demurrers and MSJs in preparation for mediation with CT.	Hartney, Mark	1.60	1,339.20	94,198.05	WO	HD	TR	_____
01/07/22	8688433	Telephone call with Attorney Hartney and forward order designating Kim Funding litigation as lead case; check status of investor state court lawsuits; forward list of defendants from clawback actions.	Kaup, John	0.80	252.00	94,450.05	WO	HD	TR	_____

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01/07/22	8696059	Communications with counsel for CalPrivate re: Receiver complaint against CTC	Fates, Edward (Ted)	0.20	128.70	94,578.75	WO	HD	TR	_____
01/07/22	8712955	Finalize complaint and notice of related cases for filing.	Hartney, Mark	1.00	837.00	95,415.75	WO	HD	TR	_____
01/10/22	8690315	Review information regarding new case against Chicago Title; review and respond to emails and forward pleadings from Ovation and Kim Funding cases; initial review of subpoena in Allred case.	Kaup, John	0.50	157.50	95,573.25	WO	HD	TR	_____
01/10/22	8691496	Evaluate issues per several calls/emails related to damages, response to CTC for information and mediation issues, advice to counsel.	Zaro, David	0.60	502.20	96,075.45	WO	HD	TR	_____
01/10/22	8696057	Discuss updated investor loss schedule requested by CTC for mediation with Receiver (.8) respond to inquiry from investors re: CTC litigation (.3) respond to inquiry from CA Department of Insurance re: CTC litigation (.7) correspondence with counsel for CTC re: updated investor loss schedule (.5)	Fates, Edward (Ted)	2.30	1,480.05	97,555.50	WO	HD	TR	_____
01/10/22	8715159	Several emails and telephone calls with client, investor counsel and T. Fates regarding mediation.	Hartney, Mark	1.20	1,004.40	98,559.90	WO	HD	TR	_____
01/10/22	8715246	Review and analysis of losing investor progress update and respond to same.	Hartney, Mark	0.80	669.60	99,229.50	WO	HD	TR	_____
01/11/22	8689871	Teleconferences and emails with D. Zaro regarding improper third party subpoena	Del Castillo, Joshua	2.10	1,351.35	100,580.85	WO	HD	TR	_____

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		for receivership records (0.3); legal analysis in connection with same (1.3); prepare summary memorandum and recommendations to D. Zaro (0.5).								
01/11/22	8690941	Check for activity in new litigation against Chicago Title.	Kaup, John	0.10	31.50	100,612.35	WO	HD	TR	_____
01/11/22	8696055	Analyze subpoena seeking investor contact information from counsel for Allred investor group and strategy/response to same	Fates, Edward (Ted)	0.50	321.75	100,934.10	WO	HD	TR	_____
01/12/22	8692376	Check for activity in new case filed against Chicago Title.	Kaup, John	0.10	31.50	100,965.60	WO	HD	TR	_____
01/12/22	8692564	Email communication with counsel, follow-up to meet with Receiver counsel related to the preparation for modification, damages and additional research, coordination among parties (.6). Emails related to mediation with counsel, follow-up thereon (.5).	Zaro, David	1.10	920.70	101,886.30	WO	HD	TR	_____
01/12/22	8696053	Analyze and respond to communications from counsel for CTC re: investor loss amounts (.5) discuss same with Receiver (.2) communications with counsel for investors re: split of 1/24 mediation fees (.2) advise on issues re: subpoena for investor contact information from Allred investors (.3) analyze and advise on issues and strategy for 1/24 mediation (.7)	Fates, Edward (Ted)	1.90	1,222.65	103,108.95	WO	HD	TR	_____

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01/13/22	8693295	Check status of new litigation against Chicago Title.	Kaup, John	0.10	31.50	103,140.45	WO	HD	TR	_____
01/13/22	8696051	Communications with counsel for Ovation re: upcoming depositions in CTC cases	Fates, Edward (Ted)	0.20	128.70	103,269.15	WO	HD	TR	_____
01/13/22	8696079	Review email and call with Receiver related to preparation for the mediation/coordination (.3). Several emails related to mediation strategy (.3).	Zaro, David	0.60	502.20	103,771.35	WO	HD	TR	_____
01/14/22	8696060	Work with Receiver and counsel concerning the mediation approach/strategy, attend meeting to address possible coordination issues and approach.	Zaro, David	0.80	669.60	104,440.95	WO	HD	TR	_____
01/14/22	8714490	Prepare for and conduct conference call with client regarding mediation; review and analysis of CT employee depo transcripts.	Hartney, Mark	2.80	2,343.60	106,784.55	WO	HD	TR	_____
01/18/22	8695805	Attend first day of remote deposition of Champion-Cain in Chicago Title cases (3.4) analyze issues re: Ovation settlement with CTC, discuss same with Receiver (.4)	Fates, Edward (Ted)	3.80	2,445.30	109,229.85	WO	HD	TR	_____
01/18/22	8696892	Review activity and status of state court litigation against Chicago Title.	Kaup, John	0.30	94.50	109,324.35	WO	HD	TR	_____
01/18/22	8699020	Email/call with counsel related to the mediation and address prospective experts/strategy (.7). Follow-up emails related to Chicago Title discovery,	Zaro, David	2.20	1,841.40	111,165.75	WO	HD	TR	_____

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		review discovery requests and evaluate preliminary issues (1.1). Emails related to Ovation/settlement (.4).								
01/18/22	8714927	Telephone conference with A. Pilmer regarding Ovation settlement and email client regarding same.	Hartney, Mark	0.40	334.80	111,500.55	WO	HD	TR	_____
01/19/22	8696938	Revisions to letter objecting to subpoena for investor contact information issued by counsel for Allred investors (.4) advise on issues relating to conference call with counsel for investors in preparation for 1/24 mediation (.4) assist in analyzing damage amounts / receivership cost projections for 1/24 mediation (.6) discuss same with Receiver (.8) call with counsel for Allred investors re: subpoena for production of investor contact information (.5)	Fates, Edward (Ted)	2.70	1,737.45	113,238.00	WO	HD	TR	_____
01/19/22	8698254	Review and respond to emails and analyze upcoming hearings; review and respond to emails and review filings from state court litigation against Chicago Title.	Kaup, John	0.80	252.00	113,490.00	WO	HD	TR	_____
01/19/22	8700126	Several emails, research the issues related to CTC defenses/damages, follow-up (1.6). Prepare for/attend a meeting with counsel and Receiver to address the mediation/coordination of parties at the mediation/offers (1.10).	Zaro, David	2.70	2,259.90	115,749.90	WO	HD	TR	_____
01/19/22	8714624	Review and analysis of global settlement calculations and telephone conference	Hartney, Mark	0.80	669.60	116,419.50	WO	HD	TR	_____

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01/19/22	8714897	Review and analysis of discovery served by CT.	Hartney, Mark	0.60	502.20	116,921.70	WO	HD	TR	_____
01/20/22	8698536	Call with counsel for investor plaintiff groups re: planning for 1/24 mediation with Chicago Title (.8) call with Receiver re: same (.6) analyze communications from mediator re: settlement approach (.4)	Fates, Edward (Ted)	1.80	1,158.30	118,080.00	WO	HD	TR	_____
01/20/22	8699658	Review complaint against Chicago Title and check status of state court litigation.	Kaup, John	0.30	94.50	118,174.50	WO	HD	TR	_____
01/20/22	8702410	Analysis of the legal issues as to the plaintiffs and receiver, approach to mediation and coordinate issues (.8). Prepare for/attend a meeting with Receiver and counsel related to mediation plan, coordination and strategy (1.6).	Zaro, David	2.40	2,008.80	120,183.30	WO	HD	TR	_____
01/20/22	8714656	Prepare for and attend conference call with plaintiffs' counsel regarding mediation; prepare for and conduct conference call with client and T. Fates regarding same; further review relevant depo transcripts in advance of mediation; review and respond to email from mediator; several emails and telephone calls with Judicate West regarding fee split and mediation.	Hartney, Mark	4.80	4,017.60	124,200.90	WO	HD	TR	_____
01/21/22	8699824	Call with Receiver and investor to address questions concerning CTC	Fates, Edward (Ted)	2.80	1,801.80	126,002.70	WO	HD	TR	_____

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		settlement issues, attorney fees, and mediation (.5) prepare for and attend conference call with Receiver and mediator re: issues for 1/24 mediation session (1.6) discuss mediation issues with Receiver (.5) communications with counsel for Allred investors and counsel for CTC re: Allred/CTC settlement and mediation (.2)								
01/21/22	8703301	Work with counsel on preparations for the global mediation, several emails and conferences as to strategy and follow-up (.9). Review specific depo testimony and evaluate settlement/mediation issues with counsel and impact of testimony/settlement (.4).	Zaro, David	2.10	1,757.70	127,760.40	WO	HD	TR	_____
01/21/22	8714203	Prepare for and conduct conference call with Denton regarding mediation; review and analysis of damage calculation; conference call with client and prepare for mediation.	Hartney, Mark	2.30	1,925.10	129,685.50	WO	HD	TR	_____
01/24/22	8703280	Check status of state court litigation.	Kaup, John	0.10	31.50	129,717.00	WO	HD	TR	_____
01/24/22	8705129	Work with Receiver and counsel as to the mediation, possible settlement issues, CTC claims and meet with Receiver/counsel (.7). Evaluate the Chicago Title motion, follow-up (.4).	Zaro, David	1.10	920.70	130,637.70	WO	HD	TR	_____
01/24/22	8706610	Prepare for and attend mediation with CTC and investor plaintiff groups	Fates, Edward (Ted)	8.20	5,276.70	135,914.40	WO	HD	TR	_____

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01/24/22	8711473	Travel to and attend mediation.	Hartney, Mark	11.00	9,207.00	145,121.40	WO	HD	TR	_____
01/25/22	8705162	Emails with Receiver and counsel related to the mediation, follow-up conference call as to mediation issues, strategy, Receiver damages, and advice regarding foregoing (1.1). Further discussions with Receiver and counsel related to the mediation/settlement and follow-up (.7).	Zaro, David	1.80	1,506.60	146,628.00	WO	HD	TR	_____
01/25/22	8706611	Prepare for and attend mediation with CTC and investor plaintiff groups (6.4) call with Receiver and investor re: CTC settlement issues (.4) respond to inquiries from CA Dept of Insurance relating to Chicago Title litigation (.5)	Fates, Edward (Ted)	7.30	4,697.55	151,325.55	WO	HD	TR	_____
01/25/22	8713217	Several telephone calls with plaintiff's counsel regarding mediation; prepare for and attend day two of mediation.	Hartney, Mark	4.10	3,431.70	154,757.25	WO	HD	TR	_____
01/26/22	8704615	Communications with counsel for Allred investors regarding issues relating to CTC settlement (.5) analyze issues, next steps and strategy for CTC litigation (.4) discuss same with Receiver (.3) communications with counsel for investor plaintiffs (.2) analyze CTC ex parte application for hearing date on discovery issues in Kim Funding case (.1)	Fates, Edward (Ted)	1.50	965.25	155,722.50	WO	HD	TR	_____
01/26/22	8705920	Review recent activity in state court case and forward ex parte application papers.	Kaup, John	0.20	63.00	155,785.50	WO	HD	TR	_____

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01/26/22	8713633	Several emails regarding scheduling Champion Cain deposition; initial evaluation of questions for depo.	Hartney, Mark	1.30	1,088.10	156,873.60	WO	HD	TR	_____
01/27/22	8706243	Call with counsel for Fenley investor group re: CTC litigation and settlement issues (.4) advise on procedural issues re: assignment of Receiver case against CTC to Judge Medel as related case (.2) address issues re: scheduling of further dates for Champion-Cain deposition (.2)	Fates, Edward (Ted)	0.80	514.80	157,388.40	WO	HD	TR	_____
01/27/22	8707272	Review email with schedule of upcoming hearings in state court cases; review status of state court litigation against Chicago Title.	Kaup, John	0.20	63.00	157,451.40	WO	HD	TR	_____
01/27/22	8713718	Review and respond to emails from opposing counsel regarding service, extension.	Hartney, Mark	0.20	167.40	157,618.80	WO	HD	TR	_____
01/27/22	8713965	Review depo transcripts of CT employees in advance of Cain deposition.	Hartney, Mark	3.30	2,762.10	160,380.90	WO	HD	TR	_____
01/28/22	8707742	Call with counsel for CalPrivate Bank re: CTC mediation and related issues	Fates, Edward (Ted)	0.50	321.75	160,702.65	WO	HD	TR	_____
01/28/22	8714344	Call with Receiver and counsel related to the mediation, next steps as to settlement.	Zaro, David	0.40	334.80	161,037.45	WO	HD	TR	_____
01/31/22	8713166	Respond to inquiry from CA Dept of Insurance re: matters relating to Chicago Title litigation	Fates, Edward (Ted)	0.40	257.40	161,294.85	WO	HD	TR	_____

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02/01/22	8715618	Analyze issues for group call with counsel for investor plaintiffs in CTC cases, confer with counsel (.8) attend conference of counsel for plaintiffs in pending CTC cases (1.7) communications with counsel for CTC (.1)	Fates, Edward (Ted)	2.60	1,673.10	162,967.95	WO	HD	TR	_____
02/01/22	8715888	Telephone conference with Zaro and Fates regarding investor' counsel call.	Hartney, Mark	0.50	418.50	163,386.45	WO	HD	TR	_____
02/01/22	8715891	Prepare for and conduct conference call with investor counsel.	Hartney, Mark	1.50	1,255.50	164,641.95	WO	HD	TR	_____
02/01/22	8716140	Review and respond to emails and forward copy of Champion-Cain criminal matter pleadings.	Kaup, John	0.30	94.50	164,736.45	WO	HD	TR	_____
02/01/22	8716642	Email with counsel and document related coordination of experts, follow-up (.4). Several emails from plaintiff's counsel, meeting with counsel related to efforts to coordinate among the plaintiffs (.8).	Zaro, David	1.20	1,004.40	165,740.85	WO	HD	TR	_____
02/01/22	8743168	Review and analysis of discovery propounded by Chicago Title.	Hartney, Mark	0.70	585.90	166,326.75	WO	HD	TR	_____
02/01/22	8743184	Review resume of potential expert.	Hartney, Mark	0.20	167.40	166,494.15	WO	HD	TR	_____
02/02/22	8716312	Call/emails with Receiver and counsel re: pending case management and discovery issues and strategy in Chicago Title litigation (1.8) call with counsel for	Fates, Edward (Ted)	2.90	1,866.15	168,360.30	WO	HD	TR	_____

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		CTC re: settlement issues (.7) call with SEC counsel re: CTC motion to lift stay in receivership (.3) advise Receiver re: same (.1)								
02/02/22	8717684	Review and respond to emails regarding Ovation discovery.	Kaup, John	0.20	63.00	168,423.30	WO	HD	TR	_____
02/02/22	8720131	Analysis of several issues related to discovery/trial, phases of trial (.8). Follow-up on Receiver negligence claims and review fact issues (.6). Prepare for/attend the meeting with Receiver/counsel to address the strategy and follow-up (1.5).	Zaro, David	2.90	2,427.30	170,850.60	WO	HD	TR	_____
02/02/22	8743630	Initial review and motion to compel filed by Kirkland.	Hartney, Mark	0.30	251.10	171,101.70	WO	HD	TR	_____
02/02/22	8743647	Prepare for and conduct conference call with client regarding investor group call, status, strategy.	Hartney, Mark	1.20	1,004.40	172,106.10	WO	HD	TR	_____
02/02/22	8743762	Initial research regarding opposition to motion for relief from stay.	Hartney, Mark	2.40	2,008.80	174,114.90	WO	HD	TR	_____
02/03/22	8717327	Call with investor re: CTC settlement issues (.5) discuss same with Receiver (.2) analyze issues relating to Champion-Cain deposition testimony and further discovery re: same (.7) discuss same with Receiver (.3) analyze correspondence and issues relating to Chicago Title subpoena to L. Finch (.4) communications with counsel for L. Finch (.2) communications with Bureau	Fates, Edward (Ted)	2.40	1,544.40	175,659.30	WO	HD	TR	_____

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		of Prisons re: Champion-Cain deposition issues (.1)								
02/03/22	8720167	Conferences with Receiver counsel and Receiver related to the mediation, settlement of the cases, strategy and follow-up calls with counsel.	Zaro, David	1.10	920.70	176,580.00	WO	HD	TR	_____
02/04/22	8718273	Analyze issues re: CTC subpoena to L. Finch (.3) call/emails with counsel for L. Finch re: same (.4) discuss same with Receiver (.2) analyze issues relating to CTC motion to lift stay in receivership (.4) analysis re: ANI document repository data and index re: same, discuss same with Receiver (.6)	Fates, Edward (Ted)	1.90	1,222.65	177,802.65	WO	HD	TR	_____
02/04/22	8720689	Analysis of CTC motion related to litigation stay and follow-up emails with counsel (.8). Conference with Receiver/counsel related to settlements, post-mediation communications with CTC and discovery (.6).	Zaro, David	1.40	1,171.80	178,974.45	WO	HD	TR	_____
02/04/22	8743869	review and analysis of Fates email regarding opposition to motion for relief from stay.	Hartney, Mark	0.40	334.80	179,309.25	WO	HD	TR	_____
02/07/22	8719939	Communications with counsel for investor plaintiffs in CTC cases re: discovery issues	Fates, Edward (Ted)	0.40	257.40	179,566.65	WO	HD	TR	_____
02/07/22	8721293	Review and respond to emails; download and organize Ovation discovery motion materials.	Kaup, John	0.50	157.50	179,724.15	WO	HD	TR	_____

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02/08/22	8721385	Call with counsel for CTC re: investor settlement issues (.3) call/emails with Receiver and counsel to update/advise on pending issues for CTC litigation, plan for Day 2 of Champion-Cain deposition, and address related issues (1.1)	Fates, Edward (Ted)	1.40	900.90	180,625.05	WO	HD	TR	_____
02/08/22	8723095	Email communications related to the CTC discovery requests and calls related to response (.4). Prepare for/attend the meeting with clients related to the strategy, pending issues as to CTC litigation and follow-up (.8). Research related to Receiver damages, follow-up on case law (.9).	Zaro, David	2.60	2,176.20	182,801.25	WO	HD	TR	_____
02/08/22	8723181	Telephone call with Attorney Hartney regarding transfer of receiver case to Judge Medel's department; review of registers of actions and previous reassignments; analysis of reassignment orders and ex parte papers and forward materials to Attorney Hartney.	Kaup, John	1.00	315.00	183,116.25	WO	HD	TR	_____
02/09/22	8722588	Call with Receiver and investor re: potential settlement with CTC (.4) advise on issues re: opposition to CTC motion to lift stay (.8) analysis re: CTC necessary party arguments (1.7) work on portion of opposition brief re: same (1.3)	Fates, Edward (Ted)	4.20	2,702.70	185,818.95	WO	HD	TR	_____
02/09/22	8724248	Several emails/calls with counsel related to the discovery/CTC motion and receiver response (.6). Research/analysis as to issues related to	Zaro, David	2.60	2,176.20	187,995.15	WO	HD	TR	_____

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		CTC motion, the Receiver's damage claims and follow-up (.8). Conference with Receiver's counsel as to the CTC motion/Receiver's response (.5). Follow-up on the issues related to the CTC motion and review cases, advice to counsel (.7).								
02/09/22	8724502	Review status of state court litigation; research, collect and forward materials related to misjoinder/indispensable parties issue; assist with ex parte application on related cases; review and respond to emails; telephone call with Attorney Kenney.	Kaup, John	3.80	1,197.00	189,192.15	WO	HD	TR	_____
02/09/22	8742600	Analyze and evaluate case status and strategy for consolidating case with related pending actions; phone call with J. Kaup regarding same.	Khalil, Suzanne	0.90	344.25	189,536.40	WO	HD	TR	_____
02/09/22	8744608	Conference call with D. Zaro and T. Fates regarding opposition to motion for relief from stay and research case law regarding same.	Hartney, Mark	4.80	4,017.60	193,554.00	WO	HD	TR	_____
02/10/22	8724046	Analyze in pari delicto issues, necessary party issues, and receivership stay issues for opposition to CTC motion to lift receivership stay (2.3) communications with court reporter re: schedule for upcoming deposition in CTC cases (.2) analyze settlement offer from counsel for CTC (.4) discuss same with Receiver (.2) communications with counsel for CTC (.1)	Fates, Edward (Ted)	3.20	2,059.20	195,613.20	WO	HD	TR	_____

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02/10/22	8725771	Review and respond to emails and assist with issues case reassignment.	Kaup, John	1.00	315.00	195,928.20	WO	HD	TR	_____
02/10/22	8726983	Work on the opposition to the motion by CTC related to the litigation stay and follow-up thereon to review pleadings, case law (2.4). Follow-up call with Receiver counsel related to the opposition (.2).	Zaro, David	2.60	2,176.20	198,104.40	WO	HD	TR	_____
02/10/22	8742601	Analyze and evaluate strategy for consolidating case with pending related cases; analyze and evaluate requirement regarding same; begin drafting ex parte application to relate and consolidate cases.	Khalil, Suzanne	2.20	841.50	198,945.90	WO	HD	TR	_____
02/10/22	8744824	Review and comment on stipulation to extend time.	Hartney, Mark	0.40	334.80	199,280.70	WO	HD	TR	_____
02/10/22	8744833	Further research and analysis regarding opposition to motion for relief from stay.	Hartney, Mark	4.20	3,515.40	202,796.10	WO	HD	TR	_____
02/11/22	8725194	Communications with counsel for L. Finch re: subpoena issued by CTC (.2) advise on issues re: document review and response re: CTC subpoena (.2) analysis of Champion-Cain testimony from Day 1 of deposition in preparation for Day 2 of deposition (.6) analyze and advise on arguments/strategy for opposition to CTC motion to lift stay (1.1)	Fates, Edward (Ted)	2.10	1,351.35	204,147.45	WO	HD	TR	_____
02/11/22	8725980	Review and respond to emails regarding draft ex parte to transfer case to Judge	Kaup, John	1.10	346.50	204,493.95	WO	HD	TR	_____

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		Medel; review and respond to emails and work with Lisa Finch documents.								
02/11/22	8727001	Analysis of the CTC settlement letter, offer and assess Receiver's response (.4). Evaluate issues and assess impact of indemnity related claims and communications with counsel (.5). Work on the draft opposition and follow-up (.7).	Zaro, David	1.60	1,339.20	205,833.15	WO	HD	TR	_____
02/11/22	8744839	Further research and drafting of opposition to motion for relief from stay.	Hartney, Mark	5.60	4,687.20	210,520.35	WO	HD	TR	_____
02/12/22	8726427	Review and respond to emails regarding opposition to Chicago Title motion	Kaup, John	0.30	94.50	210,614.85	WO	HD	TR	_____
02/12/22	8744585	Further draft and revise opposition brief.	Hartney, Mark	6.60	5,524.20	216,139.05	WO	HD	TR	_____
02/13/22	8726230	Revisions to argument section of opposition to CTC motion to lift stay	Fates, Edward (Ted)	0.70	450.45	216,589.50	WO	HD	TR	_____
02/13/22	8742602	Analyze and evaluate strategy for deeming cases related; coordinate preparation of notice of related case; draft ex parte papers to deem case related to previously pending cases; draft correspondence regarding same.	Khalil, Suzanne	1.70	650.25	217,239.75	WO	HD	TR	_____
02/13/22	8744528	Further draft and revise opposition brief and email Zaro and Fates regarding same.	Hartney, Mark	5.90	4,938.30	222,178.05	WO	HD	TR	_____
02/14/22	8726493	Discuss CTC motion to lift stay with counsel for SEC (.3) revisions to opposition to CTC motion to lift stay (.9)	Fates, Edward (Ted)	3.00	1,930.50	224,108.55	WO	HD	TR	_____

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		analyze issues relating to CTC settlement offer and response to same (.4) analyze issues re: PMK deposition of CTC on 2/15 (.2) discuss revisions to opposition to CTC motion and response to CTC settlement offer with Receiver (.8) analyze SEC opposition to CTC motion to lift stay (.4)								
02/14/22	8727797	Assist with notice of related case and ex parte application for reassignment; collect materials and draft request for judicial notice; review and respond to emails.	Kaup, John	3.80	1,197.00	225,305.55	WO	HD	TR	_____
02/14/22	8729958	Analysis of draft opposition to the motion filed by CTC related to stay, revise same, emails with Receiver counsel (1.2). Follow-up on email communications, conference with counsel related to the CTC settlement issues and strategy for negotiations (.6). Evaluate further revisions to Receiver opposition/emails with Receiver counsel (.6).	Zaro, David	2.40	2,008.80	227,314.35	WO	HD	TR	_____
02/14/22	8742604	Analyze and evaluate requirements for ex parte application; continue drafting ex parte application; draft request for judicial notice in support of opposition.	Khalil, Suzanne	3.00	1,147.50	228,461.85	WO	HD	TR	_____
02/14/22	8744861	Telephone conference with client regarding opposition to motion and revise and finalize same.	Hartney, Mark	6.60	5,524.20	233,986.05	WO	HD	TR	_____

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02/15/22	8728072	Attend PMQ deposition of L. Tyler in CTC cases (1.4) analyze CTC motion for sanctions against K. Peterson (.3) call with Receiver re: CTC settlement issues and response to CTC settlement offer (1.1) analyze issues re: response to CTC subpoena issued to L. Finch (.3)	Fates, Edward (Ted)	3.10	1,994.85	235,980.90	WO	HD	TR	_____
02/15/22	8728585	Telephone conference with client and team regarding settlement offer, status, strategy. Review contempt motion; Initial outline of questions for GCC deposition.	Hartney, Mark	2.20	1,841.40	237,822.30	WO	HD	TR	_____
02/15/22	8729226	Review and respond to emails regarding opposition filing; review of Lisa Finch documents and prepare inventory.	Kaup, John	2.30	724.50	238,546.80	WO	HD	TR	_____
02/15/22	8730010	Analysis of settlement parameters, work with counsel to assess settlement strategy/alternatives (.6). Attend conference call with the Receiver and counsel related to settlement issues (1.1).	Zaro, David	1.70	1,422.90	239,969.70	WO	HD	TR	_____
02/16/22	8729580	Work on settlement letter to counsel for CTC (2.4) discuss same with Receiver (.5) call with counsel for CTC re: Receiver/CTC settlement issues (.3) advise on issues relating to CTC discovery requests and refusal to grant extension of deadline to respond to same (.4) review media article re: investor/CTC settlements (.2)	Fates, Edward (Ted)	3.80	2,445.30	242,415.00	WO	HD	TR	_____
02/16/22	8730615	Check status of Chicago Title state court cases; review and respond to emails and	Kaup, John	0.50	157.50	242,572.50	WO	HD	TR	_____

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		forward recent filings and related news story.								
02/16/22	8733970	Meeting with counsel related to the Chicago Title Company litigation, address discovery/settlement issues (1.1). Several emails/evaluate discovery issues, address Receiver response and CTC records demands (.9). Follow-up emails/call with Receiver and counsel related to settlement, evaluate schedules and analysis of damage issues (.6).	Zaro, David	2.60	2,176.20	244,748.70	WO	HD	TR	_____
02/16/22	8744928	several emails and telephone calls regarding CT's discovery requests.	Hartney, Mark	1.20	1,004.40	245,753.10	WO	HD	TR	_____
02/17/22	8730795	Advise on discovery issues with CTC (.4) discuss same with Receiver (.2) analyze letter from counsel for Banc of California re: CTC discovery violations (.3)	Fates, Edward (Ted)	0.90	579.15	246,332.25	WO	HD	TR	_____
02/17/22	8731325	Review and respond to emails regarding good faith settlement motions in state court litigation; forward complaint from Banc of California case.	Kaup, John	0.40	126.00	246,458.25	WO	HD	TR	_____
02/17/22	8734011	Analysis of the Champion-Cain deposition transcript and call with counsel (1.8). Evaluate settlement issues and response to CTC settlement/consequential damages (.8).	Zaro, David	2.60	2,176.20	248,634.45	WO	HD	TR	_____
02/18/22	8734025	Assess reply briefs from Chicago Title Company related to motion for relief from stay, follow-up (1.2). Email related to prospective demurrer (.4).	Zaro, David	1.60	1,339.20	249,973.65	WO	HD	TR	_____

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02/20/22	8733020	Review media article regarding criminal investigation into CTC and potential prosecution	Fates, Edward (Ted)	0.30	193.05	250,166.70	WO	HD	TR	_____
02/21/22	8734269	Evaluate further damage issues, claims and follow-up on Receiver's analysis/chart.	Zaro, David	1.10	920.70	251,087.40	WO	HD	TR	_____
02/22/22	8733675	Analyze CTC reply briefs to Receiver and SEC oppositions to motion to lift stay in receivership (.6) analyze CTC correspondence re: demurrer and meet and confer re: same (.3) discuss same with Receiver (.3) analyze issue raised re: repository production by counsel for CTC (.4) respond to counsel for CTC re: same (.2) analyze correspondence from CTC counsel regarding discovery issues raised by counsel for Banc of California (.4) revisions to settlement letter to counsel for CTC (1.2) discuss revisions to same with Receiver (.6) review order vacating hearing and advise Receiver re: same (.1)	Fates, Edward (Ted)	4.10	2,638.35	253,725.75	WO	HD	TR	_____
02/22/22	8735146	Review and respond to emails and check activity in state court litigation.	Kaup, John	0.40	126.00	253,851.75	WO	HD	TR	_____
02/22/22	8735437	Emails/call with Receiver counsel related to the settlement issues and approach (.4). Research issues regarding Receiver damages and draft memorandum related to the same issues (1.6). Meeting with Receiver and counsel to review draft proposal/letter.	Zaro, David	2.60	2,176.20	256,027.95	WO	HD	TR	_____

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		follow-up (.6)								
02/22/22	8742607	Continue drafting ex parte application; draft correspondence to counsel regarding ex parte notice.	Khalil, Suzanne	1.00	382.50	256,410.45	WO	HD	TR	_____
02/22/22	8743500	Review and comment on joint motion.	Hartney, Mark	0.60	502.20	256,912.65	WO	HD	TR	_____
02/22/22	8743511	Prepare for and attend conference call with client regarding status, strategy.	Hartney, Mark	1.10	920.70	257,833.35	WO	HD	TR	_____
02/22/22	8968181	Prepare for/attend conference call with Receiver and counsel related to CTC litigation, discovery and settlement (.5).	Zaro, David	0.50	418.50	258,251.85	WO	HD	TR	_____
02/23/22	8735166	Finalize settlement letter and send same to counsel for CTC (.3) analyze letter from counsel for Banc of California to counsel for CTC re: discovery issues (.3) communications with new counsel for J. Cohen (.1) analyze and respond to counsel for CTC re: consent to production of records by CPA L. Finch (.7)	Fates, Edward (Ted)	1.40	900.90	259,152.75	WO	HD	TR	_____
02/23/22	8736576	Review and respond to emails and recent activity in state court litigation.	Kaup, John	0.50	157.50	259,310.25	WO	HD	TR	_____
02/23/22	8736789	Evaluate the draft letter response to CTC settlement proposal (.3). Follow-up on final version of the letter, call with counsel to address settlement, the discovery issues and follow-up (.6)	Zaro, David	0.90	753.30	260,063.55	WO	HD	TR	_____

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02/24/22	8736734	Analyze Champion-Cain testimony from deposition Day 1 in preparation for Day 2 (1.1) analyze and advise Receiver on CTC settlement issues (.4) communications with court reporter re: upcoming depositions in CTC cases (.2)	Fates, Edward (Ted)	1.70	1,093.95	261,157.50	WO	HD	TR	_____
02/24/22	8738731	Review and respond to emails and check latest case activity in state court litigation.	Kaup, John	0.30	94.50	261,252.00	WO	HD	TR	_____
02/24/22	8742609	Prepare for and attend hearing regarding ex parte application to relate case and transfer to Department C-66.	Khalil, Suzanne	1.00	382.50	261,634.50	WO	HD	TR	_____
02/24/22	8742830	Analysis and determination of document productions in preparation for attorney review.	Peng, Simona	1.00	315.00	261,949.50	WO	HD	TR	_____
02/24/22	8744108	Call with Receiver counsel related to the Champion-Cain deposition, issues and follow-up.	Zaro, David	0.40	334.80	262,284.30	WO	HD	TR	_____
02/25/22	8737847	Attend deposition of B. Chadwick in CalPrivate v. CTC case	Fates, Edward (Ted)	2.90	1,866.15	264,150.45	WO	HD	TR	_____
02/25/22	8739422	Review and respond to emails and forward documents regarding case reassignment.	Kaup, John	0.30	94.50	264,244.95	WO	HD	TR	_____
02/25/22	8743618	Review order re case reassignment and notice of hearing.	Hartney, Mark	0.30	251.10	264,496.05	WO	HD	TR	_____
02/28/22	8739990	Communications with counsel for Banc of California and counsel for CaPrivate Bank (.3) analyze Champion-Cain	Fates, Edward (Ted)	1.60	1,029.60	265,525.65	WO	HD	TR	_____

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		testimony re: preparation for Day 2 of deposition (.9) advise on strategy and next steps in CTC litigation (.4)								
02/28/22	8743575	Review motion to compel and several emails regarding same; email T. Fates regarding same.	Hartney, Mark	0.80	669.60	266,195.25	WO	HD	TR	_____
02/28/22	8744398	Evaluate the third party discovery demands/disputes related to Peterson litigation/Chicago Title (.6). Call with counsel as to CalPrivate Bank, follow-up (.2). Several emails, call with counsel related to Ovation and CalPrivate Bank discovery disputes (.2).	Zaro, David	1.00	837.00	267,032.25	WO	HD	TR	_____
02/28/22	8744412	Call/email with Receiver counsel related to discovery and CTC demurrer, meet/confer.	Zaro, David	0.20	167.40	267,199.65	WO	HD	TR	_____
03/01/22	8743893	Analyze Banc of California request for hearing with discovery referee re: CTC discovery violations (.4) communications with staff for discovery referee re: same (.2) analyze order granting CTC motion to lift stay and advise Receiver re: same (.4) discuss CTC discovery requests with Receiver (.3) attend group meeting of plaintiffs' counsel in CTC cases to discuss discovery, case management, and related issues (.8)	Fates, Edward (Ted)	2.10	1,351.35	268,551.00	WO	HD	TR	_____
03/01/22	8746782	Review latest activity in state court litigation.	Kaup, John	0.10	31.50	268,582.50	WO	HD	TR	_____

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03/01/22	8748082	Several emails and call with counsel related to demurrer, discovery and follow-up related to Receiver responses.	Zaro, David	0.40	334.80	268,917.30	WO	HD	TR	_____
03/01/22	8780381	Review and analysis of submissions to Judge Prager regarding discovery disputes.	Hartney, Mark	1.20	1,004.40	269,921.70	WO	HD	TR	_____
03/01/22	8780398	review and analysis of ruling on motion to lift stay.	Hartney, Mark	0.40	334.80	270,256.50	WO	HD	TR	_____
03/02/22	8746984	Analyze CTC arguments in demurrer to state court complaint (.9) discuss same and document production to CTC with Receiver (.4) advise on discovery issues, strategy and next steps (.4) analyze Champion-Cain testimony in preparation for Day 2 of deposition (.6)	Fates, Edward (Ted)	2.30	1,480.05	271,736.55	WO	HD	TR	_____
03/02/22	8747766	Initial review of demurrer by Chicago Title.	Kaup, John	0.10	31.50	271,768.05	WO	HD	TR	_____
03/02/22	8749031	Evaluate several emails/call with Receiver counsel related to discovery/demurrer.	Zaro, David	0.40	334.80	272,102.85	WO	HD	TR	_____
03/02/22	8780586	Initial review and analysis of CT's demurrer to complaint and research regarding same.	Hartney, Mark	2.20	1,841.40	273,944.25	WO	HD	TR	_____
03/03/22	8747960	Advise on strategy and next steps regarding CTC demurrer, discovery requests, document management issues, and related issues, confer with counsel re: same (.9) advise on protective order and confidentiality	Fates, Edward (Ted)	1.20	772.20	274,716.45	WO	HD	TR	_____

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		issues for document production (.3)								
03/03/22	8748420	Review and analysis of documents to produce regarding unsettled claimants (0.4); telephone conference with Zaro and Fates regarding status, strategy (1.0); email opposing counsel regarding demurrer hearing and production (0.3); review and analysis of discovery requests (0.9).	Hartney, Mark	2.60	2,176.20	276,892.65	WO	HD	TR	_____
03/03/22	8749520	Prepare document production; review and respond to emails; telephone call with Attorney Hartney.	Kaup, John	1.50	472.50	277,365.15	WO	HD	TR	_____
03/03/22	8750864	Prepare for/attend meeting with counsel concerning discovery issues and pending motions (.6). Several emails related to discovery, the production of records/protective order and follow-up advice to counsel (.8).	Zaro, David	1.40	1,171.80	278,536.95	WO	HD	TR	_____
03/04/22	8750322	Review and respond to emails and prepare additional item for production in state court litigation.	Kaup, John	0.30	94.50	278,631.45	WO	HD	TR	_____
03/04/22	8750406	Review discovery referee disclosure documents in CTC cases (.2) communications with Receiver re: document production to CTC (.3) advise on document production issues (.2) communications with counsel for Banc of California re: CTC settlement (.3) advise Receiver re: same (.3)	Fates, Edward (Ted)	1.30	836.55	279,468.00	WO	HD	TR	_____

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03/04/22	8780820	further review and analysis of demurrer and initial research regarding opposition.	Hartney, Mark	3.70	3,096.90	282,564.90	WO	HD	TR	_____
03/04/22	8780823	initial analysis of issues to cover in Champion-Cain deposition.	Hartney, Mark	2.50	2,092.50	284,657.40	WO	HD	TR	_____
03/04/22	8780829	Review prior recovery rates and telephone call with T. Fates regarding regarding same.	Hartney, Mark	0.30	251.10	284,908.50	WO	HD	TR	_____
03/05/22	8781066	further review and analysis of demurrer and draft email to Fates and Zaro regarding same.	Hartney, Mark	3.70	3,096.90	288,005.40	WO	HD	TR	_____
03/07/22	8750348	Communications with counsel for CTC re: document production (.4) call with counsel for Banc of California re: CTC settlement and related issues (.5) advise Receiver re: same (.4) advise on case strategy and management issues (.2)	Fates, Edward (Ted)	1.50	965.25	288,970.65	WO	HD	TR	_____
03/07/22	8751792	Check for details regarding Banc of California settlement; review and analysis of earlier state court Chicago Title demurrers, oppositions and rulings; prepare email summarizing relevant oppositions and rulings to Mr. Hartney	Kaup, John	2.30	724.50	289,695.15	WO	HD	TR	_____
03/07/22	8752164	Research/analysis of Chicago Title demurrer related to Receiver complaint, follow-up emails and call with Receiver counsel.	Zaro, David	0.90	753.30	290,448.45	WO	HD	TR	_____
03/08/22	8751757	Analyze issues re: settlement and dismissal of Banc of California claims against CTC and withdrawal of pending	Fates, Edward (Ted)	2.00	1,287.00	291,735.45	WO	HD	TR	_____

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		discovery motions (.5) communications with counsel for CTC re: upcoming deposition (.1) analyze issues relating to CTC in pari delicto argument in demurrer and opposition to same (.8) communications with Receiver re: prior recovery rate production (.2) analyze case management order and discovery issues (.4)								
03/08/22	8753044	Review, analyze and forward information on Banc of California settlement; assist Attorney Fates with research on in pari delicto issue; research and forward case management order documents for related cases; work on pending items.	Kaup, John	2.50	787.50	292,522.95	WO	HD	TR	_____
03/08/22	8753438	Several calls and emails to address response to demurrer, legal issues, discovery issues, coordination with settling parties as to pending discovery (.8). Review of the CTC filings, and emails regarding discovery (.3). Email/call as to legal analysis of demurrer (.3).	Zaro, David	1.40	1,171.80	293,694.75	WO	HD	TR	_____
03/08/22	8781074	review and analysis of prior demurrers from Chicago Title regarding opposition issues.	Hartney, Mark	2.90	2,427.30	296,122.05	WO	HD	TR	_____
03/08/22	8781427	Prepare for and remotely attend discovery hearing with Judge Prager.	Hartney, Mark	1.30	1,088.10	297,210.15	WO	HD	TR	_____
03/08/22	8781460	review and analysis of arguments regarding in pari delicto from T. Fates.	Hartney, Mark	0.90	753.30	297,963.45	WO	HD	TR	_____

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03/09/22	8753236	Analyze CTC arguments in demurrer and advise on strategy and response to same (1.4) review Ovation joinder in good faith settlement motion (.1) analyze and advise on responses to CTC discovery requests (.6) discuss same with Receiver (.2) communications with counsel for Ovation re: sharing of discovery documents pursuant to Case Management Order (.6)	Fates, Edward (Ted)	2.90	1,866.15	299,829.60	WO	HD	TR	_____
03/09/22	8754267	Review and respond to emails regarding discovery in state court ligation; check latest activity and settlements in state court litigation.	Kaup, John	0.50	157.50	299,987.10	WO	HD	TR	_____
03/09/22	8754535	Several emails related to discovery issues/all with counsel (.6). Meting with counsel to address the discovery issues, review responses and approach, advice related to discovery (.8).	Zaro, David	1.40	1,171.80	301,158.90	WO	HD	TR	_____
03/09/22	8755448	Analysis and determination of document productions in preparation for attorney review.	Peng, Simona	0.30	94.50	301,253.40	WO	HD	TR	_____
03/09/22	8781630	Review and analysis of settlement offer from CT.	Hartney, Mark	0.60	502.20	301,755.60	WO	HD	TR	_____
03/09/22	8781668	conference with S. Kenney and D. Valentine regarding deposition.	Hartney, Mark	1.60	1,339.20	303,094.80	WO	HD	TR	_____
03/10/22	8754250	Analyze CTC settlement counter-proposal and issues/strategy re: same (.8) calls/emails to discuss same, investor claims analysis and rising tide	Fates, Edward (Ted)	3.10	1,994.85	305,089.65	WO	HD	TR	_____

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		distribution issues with Receiver (2.1) discuss CTC discovery requests with Receiver (.2)								
03/10/22	8755589	Review status of settlements with Chicago Title and analysis of pending cases.	Kaup, John	0.30	94.50	305,184.15	WO	HD	TR	_____
03/10/22	8757914	Evaluate CTC letter and several emails, call with counsel related to discovery and accounting regarding settlement (.6). Attend meeting with Receiver and counsel related to settlement, discovery responses and related issues (1.3).	Zaro, David	1.90	1,590.30	306,774.45	WO	HD	TR	_____
03/10/22	8781871	appear at Valentine deposition regarding presentation of exhibits.	Hartney, Mark	0.50	418.50	307,192.95	WO	HD	TR	_____
03/10/22	8782033	prepare for and conduct conference call with client regarding responses to discovery and initial draft of same.	Hartney, Mark	2.20	1,841.40	309,034.35	WO	HD	TR	_____
03/10/22	8782186	telephone conference with client regarding settlement offer and draft response to CT counsel regarding same.	Hartney, Mark	0.90	753.30	309,787.65	WO	HD	TR	_____
03/11/22	8755703	Communications with mediator re: CTC settlement issues (.5) advise on settlement strategy and communications with counsel for CTC (.4)	Fates, Edward (Ted)	0.90	579.15	310,366.80	WO	HD	TR	_____
03/11/22	8757223	Check status of state court litigation.	Kaup, John	0.10	31.50	310,398.30	WO	HD	TR	_____
03/11/22	8757941	Several emails related to settlement proposal and structural issues, global	Zaro, David	0.60	502.20	310,900.50	WO	HD	TR	_____

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03/11/22	8782220	review and analysis of response from Chicago Title and email client regarding same.	Hartney, Mark	0.40	334.80	311,235.30	WO	HD	TR	_____
03/11/22	8782232	Analysis of issues to address with Champion-Cain in deposition and review T. Fates email regarding same.	Hartney, Mark	1.70	1,422.90	312,658.20	WO	HD	TR	_____
03/14/22	8757175	Analyze CTC positions on discovery dispute re: L. Tyler deposition and interview notes (.4) communications with counsel for investor plaintiffs (.4) discuss CTC settlement issues with Receiver (.5)	Fates, Edward (Ted)	1.30	836.55	313,494.75	WO	HD	TR	_____
03/14/22	8968163	Several conferences with counsel related to investor actions, discovery and settlement (.4).	Zaro, David	0.40	334.80	313,829.55	WO	HD	TR	_____
03/15/22	8758537	Communications with counsel for Ovation re: CTC discovery materials (.2) conference call with Receiver and counsel re: CTC settlement issues and responses to CTC discovery requests (2.3) analyze/summarize CTC settlement issues in preparation for call with CTC counsel (.5) discuss same with Receiver (.4) call/emails with counsel for CTC re: settlement issues (.9) communications with counsel for investors re: pending discovery issues (.2)	Fates, Edward (Ted)	4.50	2,895.75	316,725.30	WO	HD	TR	_____
03/15/22	8759338	Prepare for and conduct conference call regarding discovery and draft discovery responses.	Hartney, Mark	4.40	3,682.80	320,408.10	WO	HD	TR	_____

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03/15/22	8759340	prepare for and conduct conference call with CT counsel regarding settlement offer.	Hartney, Mark	1.00	837.00	321,245.10	WO	HD	TR	_____
03/15/22	8760005	Analysis of CTC settlement and threats re: claim, prepare for meeting with Receiver related to settlement issues (.4). Attend conference/meeting with Receiver and counsel as to settlement issues and follow-up (.9). Evaluate the CTC discovery requests and attend meeting to work on responses to the request for admission, document production and interrogatories (1.4).	Zaro, David	2.70	2,259.90	323,505.00	WO	HD	TR	_____
03/15/22	8760190	Review and respond to emails and research and forward documents related to alter ego issue on demurrer; work with materials from Ovation state court litigation.	Kaup, John	1.80	567.00	324,072.00	WO	HD	TR	_____
03/16/22	8759892	Prepare correspondence to CTC counsel confirming 3/15 discussion of proposed settlement structure and terms (.8) discuss same with Receiver (.2) review summary of conference with Judge Prager and dates/deadline for discovery disputes (.2) work on settlement letter to counsel for CTC (2.1)	Fates, Edward (Ted)	3.30	2,123.55	326,195.55	WO	HD	TR	_____
03/16/22	8760955	Review and respond to emails and work with Kirkland and Ellis documents from Ovation State Court litigation.	Kaup, John	0.90	283.50	326,479.05	WO	HD	TR	_____

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03/16/22	8761671	Conference with counsel related to third party investor claims, litigation status, results of discovery in light of third party settlement with CTC (.3). Review memorandum related to hearing results (.3).	Zaro, David	0.60	502.20	326,981.25	WO	HD	TR	_____
03/16/22	8761680	Conference/email related to settlement proposal , possible settlement structure and memorandum regarding settlement issues.	Zaro, David	0.40	334.80	327,316.05	WO	HD	TR	_____
03/16/22	8782720	Prepare for and conduct conference call with Judge Prager.	Hartney, Mark	2.10	1,757.70	329,073.75	WO	HD	TR	_____
03/17/22	8761018	Discuss settlement strategy, issues, and letter to counsel for CTC with Receiver (.8) communications with counsel for investor plaintiffs re: split of discovery referee costs and pending discovery issues (.5) revisions to CTC settlement letter (.9)	Fates, Edward (Ted)	2.20	1,415.70	330,489.45	WO	HD	TR	_____
03/17/22	8762177	Work with document productions from Ovation litigation; review and respond to emails.	Kaup, John	2.50	787.50	331,276.95	WO	HD	TR	_____
03/17/22	8762318	Analysis of draft settlement proposal, follow-up email to counsel related to revisions (.6). Call with Receiver's counsel related to the proposed settlement (.2). Follow-up with Receiver counsel related to discovery responses and coordination with investor plaintiffs (.7).	Zaro, David	1.50	1,255.50	332,532.45	WO	HD	TR	_____

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03/17/22	8782659	Initial review and analysis of prior discovery responses provided by Kirkland.	Hartney, Mark	1.60	1,339.20	333,871.65	WO	HD	TR	_____
03/18/22	8762316	Address issues re: production of discovery pleadings and document productions by counsel for Ovation and document management issues	Fates, Edward (Ted)	0.40	257.40	334,129.05	WO	HD	TR	_____
03/18/22	8763241	Telephone calls and emails regarding Chicago Title productions in state court litigation; continue work with Chicago Title files.	Kaup, John	2.30	724.50	334,853.55	WO	HD	TR	_____
03/18/22	8782642	draft and revise discovery responses and email client regarding same.	Hartney, Mark	3.90	3,264.30	338,117.85	WO	HD	TR	_____
03/18/22	8782644	email opposing counsel regarding discovery.	Hartney, Mark	0.20	167.40	338,285.25	WO	HD	TR	_____
03/21/22	8764039	Analyze and advise on CTC pending discovery issues and draft responses to CTC request for admissions (.9) call with counsel for CTC re: settlement issues (.6) discuss same with Receiver (.4)	Fates, Edward (Ted)	1.90	1,222.65	339,507.90	WO	HD	TR	_____
03/21/22	8765723	Review and respond to emails regarding recent filings in Kim Funding matter; continue work with Chicago Title production documents.	Kaup, John	1.30	409.50	339,917.40	WO	HD	TR	_____
03/21/22	8767584	Analysis of the draft of Receiver Response Request for Admissions, advice as to revisions and email (.8). Analysis of issues related to CTC settlement proposal, Receiver's	Zaro, David	1.40	1,171.80	341,089.20	WO	HD	TR	_____

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		response and evaluate counter (.6).								
03/22/22	8765435	Analyze and discuss CTC settlement issues with Receiver (.8) call with counsel for investor plaintiff groups, K. Peterson, and Nossaman re: CTC discovery issues (1.0) communications with counsel for CTC re: settlement issues (.5) discuss same with Receiver (.3) advise on responses to CTC special interrogatories (.5)	Fates, Edward (Ted)	3.10	1,994.85	343,084.05	WO	HD	TR	_____
03/22/22	8766750	Review and respond to emails and research and forward items from state court litigation cases.	Kaup, John	0.50	157.50	343,241.55	WO	HD	TR	_____
03/22/22	8767640	Analysis of the CTC email/settlement issues and conference with counsel related to structure of settlement (.4). Follow-up on email related to discovery, the Champion-Cain deposition (.7).	Zaro, David	1.10	920.70	344,162.25	WO	HD	TR	_____
03/22/22	8781838	draft and revise response to requests for admissions and special interrogatories.	Hartney, Mark	3.70	3,096.90	347,259.15	WO	HD	TR	_____
03/22/22	8782396	Prepare for and attend conference call with plaintiffs' counsel regarding CT litigation.	Hartney, Mark	1.40	1,171.80	348,430.95	WO	HD	TR	_____
03/23/22	8767274	Discuss responses to CTC requests for admissions with Receiver (.6) advise regarding responses to specific interrogatories from CTC (.3)	Fates, Edward (Ted)	0.90	579.15	349,010.10	WO	HD	TR	_____
03/23/22	8772076	Several emails and call with counsel to address discovery responses, review	Zaro, David	1.10	920.70	349,930.80	WO	HD	TR	_____

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		draft responses to requests for admission, interrogatories and follow-up.								
03/23/22	8782628	further draft and revise responses to discovery.	Hartney, Mark	6.60	5,524.20	355,455.00	WO	HD	TR	_____
03/24/22	8768545	Assist in gathering information, preparing and revising responses to requests for admission, special interrogatories, form interrogatories and requests for documents (3.8) attend deposition of S. Sutherland in CalPrivate v. CTC case (.4)	Fates, Edward (Ted)	4.20	2,702.70	358,157.70	WO	HD	TR	_____
03/24/22	8769532	Review and respond to emails and assist with discovery items and preparation for deposition of Champion-Cain.	Kaup, John	1.80	567.00	358,724.70	WO	HD	TR	_____
03/24/22	8772171	Further work on discovery responses, including calls/emails/advice related to the Receiver responses to request for admissions and interrogatories (1.80). Meeting with counsel and work on the discovery responses, revisions to same and advice to counsel (.8).	Zaro, David	2.60	2,176.20	360,900.90	WO	HD	TR	_____
03/24/22	8782438	Prepare for and conduct conference call counsel regarding GCC deposition.	Hartney, Mark	1.20	1,004.40	361,905.30	WO	HD	TR	_____
03/25/22	8769507	Assist in gathering information, preparing and revising responses to requests for admission, special interrogatories, form interrogatories and requests for documents (2.2) call with counsel for Nossaman regarding CTC settlement issues (.4) review settlement	Fates, Edward (Ted)	3.10	1,994.85	363,900.15	WO	HD	TR	_____

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		counterproposal from counsel CTC and discuss same with Receiver (.5)								
03/25/22	8770264	Further draft, revise and finalize responses to discovery.	Hartney, Mark	6.40	5,356.80	369,256.95	WO	HD	TR	_____
03/25/22	8771131	Assist with preparation of discovery responses and for deposition of Gina Champion-Cain; review and respond to emails.	Kaup, John	1.50	472.50	369,729.45	WO	HD	TR	_____
03/25/22	8777203	Work on discovery responses, review draft of request for admissions responses, interrogatories and follow-up emails/calls with counsel (2.2). Email related to CTC settlement proposal, follow-up (.4).	Zaro, David	2.60	2,176.20	371,905.65	WO	HD	TR	_____
03/26/22	8777163	Review and analysis of deposition transcripts in advance of GCC deposition and prepare for same.	Hartney, Mark	8.20	6,863.40	378,769.05	WO	HD	TR	_____
03/27/22	8771150	Review of depositions from state court cases.	Kaup, John	0.30	94.50	378,863.55	WO	HD	TR	_____
03/27/22	8777166	Further review and analysis of deposition transcripts and documents in advance of GCC deposition and prepare for same.	Hartney, Mark	6.90	5,775.30	384,638.85	WO	HD	TR	_____
03/28/22	8773405	Assist with preparation for deposition of Gina Champion-Cain.	Kaup, John	4.50	1,417.50	386,056.35	WO	HD	TR	_____
03/28/22	8777281	Evaluate/analysis of the Chicago Title counter-offer and issues regarding settlement bar/review possible structures and follow-up (.6) Call with Receiver	Zaro, David	1.90	1,590.30	387,646.65	WO	HD	TR	_____

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		related to the Chicago Title settlement (.3). Follow-up emails with counsel for CTC as to settlement (.2). Work with counsel relate to Champion-Cain deposition, meeting with counsel for Champion-Cain as to the case (.8).								
03/28/22	8780318	Telephone conference with counsel for Peterson regarding GCC deposition.	Hartney, Mark	0.60	502.20	388,148.85	WO	HD	TR	_____
03/28/22	8780327	Further review and analysis of deposition transcripts and documents in preparation for GCC deposition.	Hartney, Mark	7.80	6,528.60	394,677.45	WO	HD	TR	_____
03/28/22	8780337	Telephone call with Bureau of Prisons regarding GCC deposition.	Hartney, Mark	0.40	334.80	395,012.25	WO	HD	TR	_____
03/29/22	8774929	Assist with preparation for and taking of Gina Champion-Cain deposition.	Kaup, John	1.80	567.00	395,579.25	WO	HD	TR	_____
03/29/22	8777168	Prepare for and conduct GCC deposition.	Hartney, Mark	2.60	2,176.20	397,755.45	WO	HD	TR	_____
03/29/22	8777384	Analysis of the CTC settlement issues, then work on draft letter response regarding same (1.2). Calls with counsel and Receiver related to CTC letter response, follow-up (.6). Work on the Champion-Cain deposition, review documents and conference with Receiver/counsel (.8).	Zaro, David	2.60	2,176.20	399,931.65	WO	HD	TR	_____
03/30/22	8775518	Analyze and advise on CTC settlement counterproposal issues	Fates, Edward (Ted)	0.30	193.05	400,124.70	WO	HD	TR	_____

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03/30/22	8776858	Check status of state court litigation and for tentative rulings on pending motions.	Kaup, John	0.20	63.00	400,187.70	WO	HD	TR	_____
03/30/22	8777414	Several email related to settlement, assess counter proposal (.8). Conferences with Receiver related to the settlement issues and follow-up (.4). Draft response and follow-up on the offer to analyze response (1.1).	Zaro, David	2.30	1,925.10	402,112.80	WO	HD	TR	_____
03/30/22	8782747	Research and analysis of case law regarding demurrer.	Hartney, Mark	6.80	5,691.60	407,804.40	WO	HD	TR	_____
03/31/22	8780129	Research and analysis of caselaw regarding opposition to demurrer.	Hartney, Mark	5.90	4,938.30	412,742.70	WO	HD	TR	_____
03/31/22	8780133	review and respond to emails regarding possible settlement.	Hartney, Mark	0.90	753.30	413,496.00	WO	HD	TR	_____
03/31/22	8780137	review and analysis of depo transcripts regarding GCC deposition.	Hartney, Mark	1.10	920.70	414,416.70	WO	HD	TR	_____
03/31/22	8781720	Check status of state court cases against Chicago Title and for tentative rulings.	Kaup, John	0.20	63.00	414,479.70	WO	HD	TR	_____
03/31/22	8782188	Call with Receiver related to the settlement and terms (.2). Research/analysis of the demurrer issues, confer/advice to counsel and follow-up (1.7). Call with counsel for Chicago Title (.2). Work on issues related to the settlement/analysis of issues regarding global settlement and call with counsel (.7). Follow-up	Zaro, David	3.20	2,678.40	417,158.10	WO	HD	TR	_____

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		emails/communications related to mediation, settlement, and demurrer (.4).								
04/01/22	8782937	Prepare for and attend hearing on discovery motions with Judge Prager.	Hartney, Mark	1.60	1,339.20	418,497.30	WO	HD	TR	_____
04/01/22	8782989	Advise on issues regarding CTC settlement communications (.2) analyze and advise on arguments for opposition to CTC demurrer to complaint (.5)	Fates, Edward (Ted)	0.70	450.45	418,947.75	WO	HD	TR	_____
04/01/22	8783345	Review status of state court cases; review and analysis of tentative rulings; review and respond to emails.	Kaup, John	1.30	409.50	419,357.25	WO	HD	TR	_____
04/01/22	8786568	Follow-up with counsel related to the settlement/hearings in related litigation and pre-mediation call (.4). Call/emails with counsel, CTC and Judge Denton regarding mediation (.5). Work on issues related to global settlement, the strategy to address the balance of plaintiff investors (.7). Call with Receiver (.2).	Zaro, David	1.80	1,506.60	420,863.85	WO	HD	TR	_____
04/01/22	8811914	review and analysis of tentative rulings in various state court motions against Chicago Title.	Hartney, Mark	0.90	753.30	421,617.15	WO	HD	TR	_____
04/01/22	8811943	several emails and telephone calls with opposing counsel regarding call with Judge Denton.	Hartney, Mark	0.60	502.20	422,119.35	WO	HD	TR	_____
04/01/22	8811957	telephone conference with M. Donahue regarding demurrer hearing.	Hartney, Mark	0.30	251.10	422,370.45	WO	HD	TR	_____

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04/01/22	8811961	further research and draft opposition to demurrer.	Hartney, Mark	3.90	3,264.30	425,634.75	WO	HD	TR	_____
04/02/22	8813805	further research, draft and revise opposition to demurrer.	Hartney, Mark	7.10	5,942.70	431,577.45	WO	HD	TR	_____
04/03/22	8813806	further research, draft and revise opposition to demurrer.	Hartney, Mark	8.20	6,863.40	438,440.85	WO	HD	TR	_____
04/04/22	8783451	Analyze and revise arguments for opposition to CTC demurrer to complaint (2.2) communications with counsel for CTC re: call with mediator relating to proposed global settlement (.3) prepare for and attend Zoom meeting with mediator and counsel for CTC re: global settlement structure (.8) discuss same with Receiver (.4) call with counsel for Nossaman re: CTC settlement issues (.4)	Fates, Edward (Ted)	4.10	2,638.35	441,079.20	WO	HD	TR	_____
04/04/22	8784392	Prepare Request for Judicial Notice in support of opposition to demurrer; assist with preparation of opposition; review and respond to emails; check for final rulings in related state court litigation.	Kaup, John	1.80	567.00	441,646.20	WO	HD	TR	_____
04/04/22	8787195	Work on the opposition brief/research of S/L matters, revise opposition brief as to demurrer, address S/L and advice to counsel (1.5). Review/evaluate the final draft of the demurrer opposition (.4). Call with Receiver counsel related to settlement with CTC (.4). Attend the mediation call with counsel, CTC Counsel and Judge Denton, follow-up	Zaro, David	3.10	2,594.70	444,240.90	WO	HD	TR	_____

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04/04/22	8789465	Work with Receiver and counsel to address the Chicago Title's proposed settlement of third party litigation/investor plaintiffs and calls to address strategy/potential bar order.	Zaro, David	0.60	502.20	444,743.10	WO	HD	TR	_____
04/04/22	8813809	draft, revise, finalize and file opposition to demurrer.	Hartney, Mark	7.50	6,277.50	451,020.60	WO	HD	TR	_____
04/04/22	8815100	prepare for GCC deposition.	Hartney, Mark	1.60	1,339.20	452,359.80	WO	HD	TR	_____
04/05/22	8784956	Call with counsel for Nossaman re: issues relating to potential CTC settlement (.5) analyze CTC meet and confer letter re: discovery responses (.4)	Fates, Edward (Ted)	0.90	579.15	452,938.95	WO	HD	TR	_____
04/05/22	8785338	Review and respond to emails and assist with preparation for deposition of Gina Champion-Cain; check for final rulings in state court cases against Chicago Title.	Kaup, John	0.50	157.50	453,096.45	WO	HD	TR	_____
04/05/22	8814823	Prepare for day 2 of deposition of GCC.	Hartney, Mark	5.40	4,519.80	457,616.25	WO	HD	TR	_____
04/06/22	8787284	Assist with taking of deposition of Gina Champion-Cain; check for final rulings in related state court litigation.	Kaup, John	4.60	1,449.00	459,065.25	WO	HD	TR	_____
04/06/22	8790985	Work with counsel related to Champion-Cain deposition and issues related to Peterson litigation (.4). Follow-up with counsel related to the CTC settlement issues and plaintiff investors (.3).	Zaro, David	0.70	585.90	459,651.15	WO	HD	TR	_____

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04/06/22	8814831	Prepare for and attend deposition of GCC.	Hartney, Mark	7.50	6,277.50	465,928.65	WO	HD	TR	_____
04/07/22	8786474	Call with counsel for Nossaman re: issues relating to potential CTC settlement (.4) communications with Judge Denton re: CTC mediation (.2)	Fates, Edward (Ted)	0.60	386.10	466,314.75	WO	HD	TR	_____
04/07/22	8787557	Check for final rulings in state court litigation.	Kaup, John	0.10	31.50	466,346.25	WO	HD	TR	_____
04/07/22	8790996	Emails/call related to prospective settlement with Chicago Title and follow-up (.6). Conference with counsel regarding Champion-Cain deposition, follow-up on the Champion-Cain deposition, work on outline of issues to be addressed (.8).	Zaro, David	1.40	1,171.80	467,518.05	WO	HD	TR	_____
04/08/22	8788469	Call with counsel for Wakefield investors re: CTC settlement issues (.5) advise Receiver re: same (.2)	Fates, Edward (Ted)	0.70	450.45	467,968.50	WO	HD	TR	_____
04/08/22	8789840	Check for final rulings in state court cases.	Kaup, John	0.10	31.50	468,000.00	WO	HD	TR	_____
04/08/22	8814927	Review and respond to emails regarding settlement proposal with CT.	Hartney, Mark	0.30	251.10	468,251.10	WO	HD	TR	_____
04/09/22	8789833	Check for final rulings in state court cases.	Kaup, John	0.10	31.50	468,282.60	WO	HD	TR	_____
04/10/22	8789829	Initial review of reply by Chicago Title on demurrer.	Kaup, John	0.10	31.50	468,314.10	WO	HD	TR	_____

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04/11/22	8789182	Analyze CTC reply in support of demurrer to complaint (.8) communications with Judge Denton re: mediation/settlement issues (.5) communications with counsel for CTC re: settlement/mediation issues (.9) advise Receiver re: same (.4) communications with counsel for investor/plaintiffs and counsel for Nossaman (.5) initial work on motion for approval of D. Libs settlement (.2)	Fates, Edward (Ted)	3.30	2,123.55	470,437.65	WO	HD	TR	_____
04/11/22	8790392	Check for final rulings in state court litigation; review Chicago Title reply on demurrer.	Kaup, John	0.20	63.00	470,500.65	WO	HD	TR	_____
04/11/22	8793216	Email related to investor plaintiff responses to settlement proposal and conference with counsel related to settlement (.4). Call/email follow-up as to settlement with CTC and negotiations with investor plaintiffs, and emails (.7).	Zaro, David	1.10	920.70	471,421.35	WO	HD	TR	_____
04/12/22	8790727	Communications with Receiver and counsel for CTC re: CTC mediation and settlement issues	Fates, Edward (Ted)	0.80	514.80	471,936.15	WO	HD	TR	_____
04/12/22	8791578	Review and respond to emails and forward copy of Champion Cain Deposition Transcript Volume 2.	Kaup, John	0.30	94.50	472,030.65	WO	HD	TR	_____
04/13/22	8793301	Work on/attend the mediation related to CTC settlement proposal, conferences with counsel and Receiver regarding strategy (1.8). Several emails/calls with	Zaro, David	2.80	2,343.60	474,374.25	WO	HD	TR	_____

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		counsel related to investor plaintiff responses and follow-up (1.0).								
04/13/22	8794209	Participate in CTC mediation with Judge Denton and advise Receiver re: same (5.2) communications with counsel for investors and counsel for Nossaman re: same (.3) communications with CTC counsel re: 4/15 hearing re: demurrer (.2)	Fates, Edward (Ted)	5.70	3,667.95	478,042.20	WO	HD	TR	_____
04/14/22	8793028	Communications with counsel for CTC re: continuance of hearing on demurrer (.2) communications with counsel for CalPrivate re: CTC settlement issues (.4) analyze and revise proposed settlement term sheet from counsel for CTC (1.1)	Fates, Edward (Ted)	1.70	1,093.95	479,136.15	WO	HD	TR	_____
04/14/22	8793824	Check for final rulings in related state court litigation; review continuance of demurrer hearing.	Kaup, John	0.20	63.00	479,199.15	WO	HD	TR	_____
04/14/22	8797487	Several conferences/email related to the proposed settlement and analysis of claims/settlements as to the Nossaman, Investor plaintiff claimants, follow-up (.7). Several emails regarding settlement negotiations with plaintiffs (.4). Conference call with counsel for CalPrivate Bank and Receiver related to settlement (.6).	Zaro, David	1.70	1,422.90	480,622.05	WO	HD	TR	_____
04/15/22	8793870	Call with counsel for Nossaman re: CTC settlement issues (.5) revisions to proposed settlement term sheet from counsel for CTC (.8) call with counsel for	Fates, Edward (Ted)	2.40	1,544.40	482,166.45	WO	HD	TR	_____

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		CTC re: settlement issues and term sheet (.7) discuss same with Receiver (.4)								
04/15/22	8794871	Check for final rulings in related state court litigation.	Kaup, John	0.10	31.50	482,197.95	WO	HD	TR	_____
04/15/22	8797521	Several emails and meeting with the Receiver/counsel related to settlement negotiations (.7). Review of the term sheet from Chicago title, follow-up (.6). Meeting with counsel regarding CalPrivate Bank (.4).	Zaro, David	1.70	1,422.90	483,620.85	WO	HD	TR	_____
04/18/22	8795285	Analyze and discuss draft settlement term sheet from CTC counsel with Receiver (1.4) communications with counsel for CTC re: same (.4) analyze meeting minutes from 4/14 hearing with Judge Prager relating to K. Peterson discovery issues (.3)	Fates, Edward (Ted)	2.10	1,351.35	484,972.20	WO	HD	TR	_____
04/18/22	8796694	Check for final rulings in related state court litigation.	Kaup, John	0.10	31.50	485,003.70	WO	HD	TR	_____
04/18/22	8798561	Work on the draft erm sheet related to the settlement with CTC/global settlement issues and call with counsel to prepare for meeting (1.3). Attend meeting with Receiver/counsel to address settlement terms and follow-up with counsel, email revisions (1.3).	Zaro, David	2.60	2,176.20	487,179.90	WO	HD	TR	_____
04/19/22	8797152	Work on revisions to CTC/Receiver settlement agreement (4.8) discuss same with Receiver (1.2)	Fates, Edward (Ted)	6.70	4,311.45	491,491.35	WO	HD	TR	_____

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		communications with counsel for CTC (.2) analyze issues re: stipulated resolution of CTC discovery dispute re: L. Tyler deposition (.2) communications with counsel for Wakefield Parties re: same (.1) communications with counsel for investors and counsel for CTC re: Day 3 of Champion-Cain deposition (.2)								
04/19/22	8799757	Check for entry of final rulings in related state court litigation.	Kaup, John	0.10	31.50	491,522.85	WO	HD	TR	_____
04/19/22	8801451	Follow-up on the Champion-Cain deposition, testimony issues (.4). Call with Receiver's counsel as to settlement term sheet and agreement (.4). Further revisions, work on draft of the term sheet, follow-up email communications (1.8). Emails/calls related to the settlement and follow-up (.3).	Zaro, David	2.90	2,427.30	493,950.15	WO	HD	TR	_____
04/20/22	8798322	Advise on issues re: Day 3 of Champion-Cain deposition (.4) communications with Receiver and counsel for Champion-Cain re: same (.4) communications with counsel for CTC re: same and draft settlement term sheet (.7) discuss CTC settlement issues with Receiver (.3)	Fates, Edward (Ted)	1.80	1,158.30	495,108.45	WO	HD	TR	_____
04/20/22	8799387	Check for final rulings in related state court litigation; review status of discovery.	Kaup, John	0.30	94.50	495,202.95	WO	HD	TR	_____
04/20/22	8803269	Several emails/call with Receiver counsel and CTC related to Champion-	Zaro, David	1.20	1,004.40	496,207.35	WO	HD	TR	_____

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		Cain deposition and settlement draft of CTC response to foregoing issues (.6). Evaluate the emails/issues related to the draft settlement (.3). Review the discovery orders related to CTC records/testimony (.3).								
04/20/22	8815028	Several emails and telephone calls regarding GCC deposition.	Hartney, Mark	0.90	753.30	496,960.65	WO	HD	TR	_____
04/21/22	8800710	Check for final rulings in related state court litigation.	Kaup, John	0.10	31.50	496,992.15	WO	HD	TR	_____
04/21/22	8803304	Call with Receiver counsel related to the CTC settlement and further issues as to settlement bar/global settlement.	Zaro, David	0.30	251.10	497,243.25	WO	HD	TR	_____
04/21/22	8803305	Several emails/call with Receiver counsel related to the investor plaintiff discovery issues, follow-up.	Zaro, David	0.30	251.10	497,494.35	WO	HD	TR	_____
04/22/22	8801085	Analyze and revise CTC draft settlement agreement (1.9) discuss same with Receiver (.3) communications with counsel for CTC (.3)	Fates, Edward (Ted)	2.50	1,608.75	499,103.10	WO	HD	TR	_____
04/22/22	8802122	Check for final rulings and review status of state court cases.	Kaup, John	0.10	31.50	499,134.60	WO	HD	TR	_____
04/22/22	8808556	Several emails, address the Chicago Title response to the draft subpoena (.4). Several emails related to settlement, call with counsel (.3).	Zaro, David	0.70	585.90	499,720.50	WO	HD	TR	_____
04/24/22	8802545	Check for final rulings in related state court cases	Kaup, John	0.10	31.50	499,752.00	WO	HD	TR	_____

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04/25/22	8802794	Communications with Receiver re: revisions to CTC draft settlement agreement (1.4) further revisions to CTC draft settlement agreement (1.7) communications with counsel for state court parties re: rescheduling of Champion-Cain deposition Day 3 (.2)	Fates, Edward (Ted)	3.30	2,123.55	501,875.55	WO	HD	TR	_____
04/25/22	8810501	Evaluate/analysis of revised settlement agreement, revise document (.8). Email with counsel/Receiver related to changes to the draft settlement (.4). Meeting with the Receiver and counsel related to the settlement agreement terms, follow-up (.6). Call with counsel as related to the settlement agreement (.2).	Zaro, David	2.00	1,674.00	503,549.55	WO	HD	TR	_____
04/26/22	8804627	Communications with counsel for CTC re: revisions to draft settlement agreement (2.1) analyze revisions to agreement and discuss same with Receiver (1.9) analyze stipulation relating to pending CTC discovery disputes (.2)	Fates, Edward (Ted)	4.20	2,702.70	506,252.25	WO	HD	TR	_____
04/26/22	8805880	Check for final rulings in related state court litigation.	Kaup, John	0.10	31.50	506,283.75	WO	HD	TR	_____
04/26/22	8810624	Several emails/call related to draft settlement agreement (.4). Work on draft of settlement agreement as to CTC revisions and response (1.7). Meeting with the Receiver and counsel related to the draft, follow-up calls as to terms (.9).	Zaro, David	2.60	2,176.20	508,459.95	WO	HD	TR	_____

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04/27/22	8806038	Work on correspondence to non-plaintiff investors re: opportunity to join CTC settlement (1.4) analyze and advise on strategy and next steps re: settlement issues and approval (.4) communications with counsel for CalPrivate re: settlement (.3) communications with non-plaintiff investors re: CTC settlement (.4) communications with counsel for CTC re: claimant joinder and stay issues (.4) revisions to notice of conditional settlement (.4) discuss same with Receiver (.3)	Fates, Edward (Ted)	3.60	2,316.60	510,776.55	WO	HD	TR	_____
04/27/22	8810806	Work on the final draft of the settlement agreement and joinder of parties, agreement and follow-up (1.2). Several calls/emails related to potential settling parties, the plaintiff parties' responses (1.2).	Zaro, David	2.40	2,008.80	512,785.35	WO	HD	TR	_____
04/28/22	8807982	Communications with counsel for CTC re: notice of conditional settlement (.2) communications with counsel for CalPrivate Bank (.4) communications with counsel for Wakefield investor group and counsel for Heller investor group (.6) advise Receiver re: response to media inquiry regarding CTC settlement (.2) analyze media article and discuss same with Receiver (.4) communications with SEC counsel re: settlement (.1)	Fates, Edward (Ted)	1.90	1,222.65	514,008.00	WO	HD	TR	_____

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04/28/22	8809436	Review and forward tentative ruling from Kim Funding case.	Kaup, John	0.10	31.50	514,039.50	WO	HD	TR	_____
04/28/22	8810843	Evaluate/revise draft of Notice of Settlement, address issues related to settlement/stay of proceedings and call with counsel (.6). Emails/call to follow-up on the settlement with non-settling investor counsel and proposed meeting/compromises (.6).	Zaro, David	1.20	1,004.40	515,043.90	WO	HD	TR	_____
04/29/22	8811004	Several emails and assess threats by counsel for third party investor as actions, settlement and follow-up.	Zaro, David	0.40	334.80	515,378.70	WO	HD	TR	_____
04/29/22	8811011	Analysis of potential for settlement with claimants/CPB in connection with CTC settlement and prepare for meeting with CPB (.6). Conference call with counsel for CalPrivate Bank and Receiver as to CTC settlement, joinder and negotiation as to claims resolution (.8). Follow-up call with counsel related to meeting with CPB (.2).	Zaro, David	1.60	1,339.20	516,717.90	WO	HD	TR	_____
04/29/22	8811019	Check for final rulings in related cases; initial review of settlement.	Kaup, John	0.20	63.00	516,780.90	WO	HD	TR	_____
04/29/22	8813628	Communications with non-plaintiff investors regarding CTC settlement and option to join (.8) call with counsel for CTC re: ex parte motion to temporarily stay state court cases against CTC pending approval of settlement (.4) discuss same with Receiver (.2) work on draft joinder to ex parte motion (1.9)	Fates, Edward (Ted)	3.30	2,123.55	518,904.45	WO	HD	TR	_____

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05/01/22	8815384	Review status of state court related cases; obtain, review and forward orders regarding good faith settlement motions.	Kaup, John	0.50	157.50	519,061.95	WO	HD	TR	_____
05/02/22	8815411	Analyze CTC revised ex parte motion for temporary stay of state court actions (.4) revisions to draft joinder to motion (.6) discuss same with Receiver (.3) finalize same and advise on service issues (.4) initial work on motion for approval of CTC settlement (.4) analyze oppositions to ex parte motion for temporary stay (.8)	Fates, Edward (Ted)	2.90	1,866.15	520,928.10	WO	HD	TR	_____
05/02/22	8817529	Evaluate the CTC ex parte application and declaration (.6). Work on the draft of Receiver's brief and follow-up with counsel (.8). Several emails/review pleading filed in the CTC action, call with counsel, address next steps and follow-up (1.2).	Zaro, David	2.60	2,176.20	523,104.30	WO	HD	TR	_____
05/03/22	8816396	Prepare for and attend ex parte hearing regarding CTC motion for temporary stay pending motion to approve settlement (1.2) communications with counsel for CalPrivate and counsel for Nossaman (.7) discuss same with Receiver (.4) work on motion for approval of CTC settlement (1.3) communications with unrepresented investor re: CTC settlement (.3)	Fates, Edward (Ted)	3.90	2,509.65	525,613.95	WO	HD	TR	_____
05/03/22	8817261	Review status of state court litigation and forward final ruling from Kim Funding case.	Kaup, John	0.20	63.00	525,676.95	WO	HD	TR	_____

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05/03/22	8817602	Evaluate orders related to good faith settlement motions (.3). Meeting with counsel to address the hearing as to stay motion/State Court and settlement issues (.4). Several emails as to rulings related to discovery and follow-up (.4).	Zaro, David	1.10	920.70	526,597.65	WO	HD	TR	_____
05/04/22	8817397	Communications with unrepresented investors regarding CTC settlement agreement (.4) communications with counsel for CTC (.1) work on motion for approval of settlement with CTC (3.6) analyze legal issues relating to proposed bar order (1.7) analyze state court order on demurrers, motion to strike and motion for sanctions against K. Peterson (.4) review order denying as moot request to file supplement brief under seal and advise Receiver re: same (.2) analyze supplemental brief from Zinder investors in opposition to temporary stay (.3)	Fates, Edward (Ted)	6.70	4,311.45	530,909.10	WO	HD	TR	_____
05/04/22	8818905	Several emails and review of the court's order, follow-up with counsel related to settlement.	Zaro, David	0.30	251.10	531,160.20	WO	HD	TR	_____
05/05/22	8818795	Prepare for and attend ex parte hearing on CTC motion to temporarily stay state court actions (2.7) advise Receiver re: same (.4) analyze issues for motion to approve CTC settlement (.4) analyze correspondence from counsel for Armstrong investors and counsel for CTC (.4) prepare response to same and	Fates, Edward (Ted)	5.10	3,281.85	534,442.05	WO	HD	TR	_____

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		discuss with Receiver (.8) communications with counsel for J. Cohen re: CTC ex parte motion for temporary stay (.2) communications with unrepresented investor re: CTC settlement (.2)								
05/05/22	8819350	Review status of related state court cases.	Kaup, John	0.10	31.50	534,473.55	WO	HD	TR	_____
05/05/22	8819889	Evaluate the issues as to potential disputes as to due process/bar order (.4). Several emails/calls with Receiver counsel, draft revisions to the communications with CTC and the investor counsel as to stay motion, the settlement motion and status conference (1.2).	Zaro, David	1.60	1,339.20	535,812.75	WO	HD	TR	_____
05/06/22	8820544	Review and forward recent rulings in state court litigation; review and analysis of state court lawsuits and prepare insert for motion to approve settlement; review and respond to emails	Kaup, John	1.40	441.00	536,253.75	WO	HD	TR	_____
05/06/22	8820977	Work on motion for approval of CTC settlement including bar order as to state court actions (.9) analyze issues re: Day 3 of Champion-Cain deposition (.2)	Fates, Edward (Ted)	1.10	707.85	536,961.60	WO	HD	TR	_____
05/06/22	8822620	Research/analysis of the issues related to the settlement bar/due process issues and follow-up (1.4). Emails concerning and evaluate CTC filings as to discovery dispute (.4).	Zaro, David	1.80	1,506.60	538,468.20	WO	HD	TR	_____

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05/09/22	8821340	Communications with counsel for CTC re: Nossaman settlement, motion to approve Receiver / CTC settlement, communications with investor plaintiffs, and related issues (.8) communications with unrepresented investor re: CTC settlement agreement and joinder to same (.4) work on motion for approval of CTC settlement (1.2) discuss same with Receiver (.2)	Fates, Edward (Ted)	2.60	1,673.10	540,141.30	WO	HD	TR	_____
05/09/22	8822444	Check status of state court litigation.	Kaup, John	0.10	31.50	540,172.80	WO	HD	TR	_____
05/09/22	8822810	Research/analysis of the legal issues related to claim, disputes, due process, summary proceedings and follow-up (.8). Work with counsel, email/call in order to address the disputed claims, follow-up as it related to settlement motion and claims bar (.4).	Zaro, David	1.20	1,004.40	541,177.20	WO	HD	TR	_____
05/10/22	8822771	Work on motion for approval of CTC settlement agreement (3.5) discuss accounting analysis needed for same with Receiver (.3) communications with counsel for plaintiff investors joining CTC settlement (.2) advise Receiver re: same (.2)	Fates, Edward (Ted)	4.20	2,702.70	543,879.90	WO	HD	TR	_____
05/11/22	8823876	Work on motion for approval of CTC settlement, updates re: additional investors who joined agreement (2.6) communications with counsel for joining investors (.2) communications with counsel for CTC (.7)	Fates, Edward (Ted)	3.50	2,252.25	546,132.15	WO	HD	TR	_____

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05/11/22	8825050	Several emails/calls with counsel/Receiver related to the settlement motion, approach to claims issues and coordination of motions (.3). Work on narrative related to the settlement motion/bar and claims treatment and issues (.8). Call with Receiver to address narrative, foundational issues related to evidence for brief and Receiver declaration (1.0). Follow-up on call with Receiver to review documents, reports and emails related to CalPrivate (1.1).	Zaro, David	3.20	2,678.40	548,810.55	WO	HD	TR	_____
05/12/22	8825008	Work on motion to approve CTC settlement and legal arguments in response to objecting plaintiffs' state court briefs (5.9) communications with Receiver and counsel for CTC re: same (.9)	Fates, Edward (Ted)	6.80	4,375.80	553,186.35	WO	HD	TR	_____
05/12/22	8828178	Several emails with counsel, assess CTRC draft settlement motion (.4). Analysis of the draft narrative as to lender claimants, continue work on draft (.8).	Zaro, David	1.20	1,004.40	554,190.75	WO	HD	TR	_____
05/13/22	8826021	Continued work on motion for approval of CTC settlement and bar order, revisions and updates to same (1.2) communications with counsel for CTC and counsel for investor plaintiffs re: Day 3 of Champion-Cain deposition (.3) communications with counsel for CTC re: settlement approval issues and notice	Fates, Edward (Ted)	2.40	1,544.40	555,735.15	WO	HD	TR	_____

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		issues relating to proposed bar order (.7) discuss same with Receiver (.2)								
05/13/22	8830976	Evaluate CTC counsel email and draft memorandum as to settlement/legal issues, review certain case law (.5). Evaluate/revise the draft of the memorandum of points and authorities related to plan, settlement, bar and claims, follow-up with counsel (2.0). Emails related to CTC/Receiver status conference (.2).	Zaro, David	2.70	2,259.90	557,995.05	WO	HD	TR	_____
05/14/22	8827401	Review, analyze, and forward order from Kim Funding case on sanctions.	Kaup, John	0.20	63.00	558,058.05	WO	HD	TR	_____
05/16/22	8827775	Communications with counsel for Nossaman re: CTC settlement and bar order issues (.3) revisions to motion for approval of CTC settlement (2.2) discuss same with Receiver (.4) discuss issues relating to settlement and approval motion with counsel for CTC (.4) call with counsel for Champion-Cain re: Day 3 of deposition (.2) communications with counsel for investors and counsel for CTC re: same (.3)	Fates, Edward (Ted)	3.80	2,445.30	560,503.35	WO	HD	TR	_____
05/16/22	8832326	Analysis of issues related to the motion to approve settlement, status conference and opposition to CalPrivate's ex parte application, follow-up meeting to provide advice to Receiver counsel as to revisions to brief (1.9). Further research/analysis of prior briefing/filings and evidence/testimony and work on the	Zaro, David	4.10	3,431.70	563,935.05	WO	HD	TR	_____

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05/17/22	8829603	Discuss strategy re: motion for approval of CTC settlement and revisions to same with Receiver (1.6) work on revisions (.9) call with counsel for CTC re: issues relating to Nossaman / CTC settlement (.3) call with counsel for Nossaman re: same (.4) work on Receiver declaration in support of motion for approval of CTC settlement (.9)	Fates, Edward (Ted)	4.10	2,638.35	566,573.40	WO	HD	TR	_____
05/17/22	8832338	Analysis/evaluate the Receiver's comments/notes and issues as to draft motion, follow-up regarding same (.9). Conference with counsel related to further revisions, Receiver revisions to the brief, follow-up on draft (.4). Follow-up email/analysis regarding the status conference, CTC brief related to settlement and settlement (.6).	Zaro, David	1.90	1,590.30	568,163.70	WO	HD	TR	_____
05/18/22	8830727	Communications with counsel for CTC re: scheduling motion to approve CTC settlement and issues relating to Nossaman settlement, release, and bar order (.4) work on revisions / updates to settlement approval motion (1.6) analyze CTC / Nossaman settlement and discuss same with Receiver (.7) work on proposed revisions to same (.4)	Fates, Edward (Ted)	3.10	1,994.85	570,158.55	WO	HD	TR	_____
05/18/22	8833788	Analysis of the draft of Nossaman settlement, the impact and issues related to the proposed bar as to third party claims, follow-up email advice to	Zaro, David	1.40	1,171.80	571,330.35	WO	HD	TR	_____

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		counsel/Receiver (1.1). Follow-up with Receiver counsel related to the bar process (.3).								
05/19/22	8832175	Finalize proposed revisions to CTC / Nossaman settlement, discuss same with Receiver (.5) communications with counsel for CTC and counsel for Nossaman re: terms of settlement agreement (1.1) revisions to CTC settlement motion and supporting declaration (.5) analyze order relating to settlement approval motion, bar order and notice of same (.3) discuss same with Receiver (.6) discuss same with counsel for CTC (.6) call with court clerk re: same (.1) communications with counsel for Champion-Cain re: issues relating to CTC settlement (.2) analyze due process / notice issues for settlement approval motion (.4) work on request for judicial notice in support of settlement approval motion (.4) analyze draft joinder to settlement motion from counsel for CTC (.5)	Fates, Edward (Ted)	5.20	3,346.20	574,676.55	WO	HD	TR	_____
05/19/22	8833883	Call with counsel to related arguments in motion/CTC joinder and follow-up (.6). Review Court order, analysis of issues related to the Status Conference order/court's orders and legal analysis (.8). Attend meeting with counsel and Receiver to address order, plan, strategy and follow-up to address notice (1.2).	Zaro, David	2.60	2,176.20	576,852.75	WO	HD	TR	_____

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05/20/22	8833623	Discuss revisions to motion for approval of CTC settlement and issues with CTC draft joinder with Receiver (1.4) work on revisions to motion (.8) calls/emails with counsel for CTC and counsel for Nossaman re: issues relating to CTC / Nossaman settlement of release of claims against receivership (1.1) revisions to release provision in CTC / Nossaman settlement agreement (.5) work on Receiver declaration in support of settlement approval motion (1.3) communications with CTC counsel re: notice plan and settlement motion hearing / briefing schedule (.2)	Fates, Edward (Ted)	5.30	3,410.55	580,263.30	WO	HD	TR	_____
05/20/22	8836340	Email/evaluate, analysis of CTC draft motion to approve the CTC-Receiver settlement, follow-up email/advice to counsel (1.2). Emails/evaluate proposed plan and timing issues, confer with counsel, follow-up email as to settlement motion and plan (.7).	Zaro, David	1.90	1,590.30	581,853.60	WO	HD	TR	_____
05/23/22	8835439	Analyze and revise proposed orders regarding CTC settlement approval motion and CTC / Nossaman settlement (1.6) discuss same and revisions to Receiver's declaration for settlement approval motion with Receiver (1.3) work on revisions to declaration and corresponding revisions to settlement approval motion (1.4) communications with counsel for CTC re: Nossaman settlement and proposed orders (1.1) communications with counsel for	Fates, Edward (Ted)	6.80	4,375.80	586,229.40	WO	HD	TR	_____

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		Nossaman (.4) discuss same and execution of Nossaman settlement with Receiver (.6) initial work on notice plan for settlement approval motion (.4)								
05/23/22	8839089	Analysis of issues, revise draft of the motion to approve settlement and points/authorities (1.1). Evaluate/further revisions to draft of the order approving the settlement (.9). Call/emails with Receiver counsel as to the CTC settlement and follow-up (.6).	Zaro, David	2.40	2,008.80	588,238.20	WO	HD	TR	_____
05/24/22	8837205	Work on notice plan for settlement approval motion and proposed form of notice (1.3) emails with counsel for investors re: notice of CTC settlement approval motion (.2) discuss notice plan and related issues with counsel for CTC (.3)	Fates, Edward (Ted)	1.80	1,158.30	589,396.50	WO	HD	TR	_____
05/25/22	8839133	Call with Receiver to discuss draft notice plan for settlement motion (.3) work on revisions to same (.4) analyze CTC arguments in joinder to settlement approval motion and declaration/exhibits in support of joinder (.5) communications with counsel for CTC re: notice plan and ex parte application for ruling on same (.4) discuss same with Receiver (.1)	Fates, Edward (Ted)	1.70	1,093.95	590,490.45	WO	HD	TR	_____
05/25/22	8840773	Analysis of the draft of the Receiver's notice plan and plan proposal as to the motion and assess revisions, follow-up (.8). Prepare for/attend the meeting with Receiver and counsel to address the	Zaro, David	2.10	1,757.70	592,248.15	WO	HD	TR	_____

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		settlement motion (.7). Revise the draft of the Receiver's plan for notice and the notion, email to counsel (.6).								
05/26/22	8840645	Revise and finalize proposed notice plan for settlement approval motion (.5) communications with counsel for CTC re: same and ex parte application (.2) communications with counsel for objecting investors (.5)	Fates, Edward (Ted)	1.20	772.20	593,020.35	WO	HD	TR	_____
05/26/22	8847758	Follow-up to assess Chicago Title's briefing of litigation/claim bar and various emails related to ex parte by CTC (.4). Email communications with counsel for claimants, receiver and plaintiff counsel as to the combined Plans for claim/distribution motion and CTC settlement (.4).	Zaro, David	0.80	669.60	593,689.95	WO	HD	TR	_____
05/27/22	8843310	Analyze CalPrivate opposition to CTC ex parte application to approve notice plan and briefing schedule for settlement approval motion (.3) analyze Nossaman joinder to settlement approval motion (.4)	Fates, Edward (Ted)	0.70	450.45	594,140.40	WO	HD	TR	_____
05/29/22	8848248	Evaluate the ex parte application of CTC and response of counsel for investor, follow-up.	Zaro, David	0.60	502.20	594,642.60	WO	HD	TR	_____
05/31/22	8846795	Communications with new counsel for Ovation re: proposed Nossaman bar order (.2) analyze CTC reply in support of ex parte app for approval of notice plan (.2)	Fates, Edward (Ted)	0.40	257.40	594,900.00	WO	HD	TR	_____

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05/31/22	8848479	Call with Receiver and counsel related to several emails re: CTC filings as to settlement (.4). Review/analysis of the CTC briefing and opposition, and Receiver's response, follow-up (.9).	Zaro, David	1.30	1,088.10	595,988.10	WO	HD	TR	_____
06/01/22	8851865	Evaluate the objections, declarations as to the ex parte application, Receiver's proposed settlement motion plan and follow-up (.8). Follow-up on the plan for motion/CTC's reply and call with counsel (.3).	Zaro, David	1.10	920.70	596,908.80	WO	HD	TR	_____
06/02/22	8851666	Call with counsel for Ovation re: issues relating to CTC / Nossaman settlement (.6) analyze issues relating to bar order and Ovation claims (.3)	Fates, Edward (Ted)	0.90	579.15	597,487.95	WO	HD	TR	_____
06/03/22	8867562	Analyze correspondence from counsel for Ovation and tolling agreement relating to Ovation Management claims against Nossaman	Fates, Edward (Ted)	0.60	386.10	597,874.05	WO	HD	TR	_____
06/06/22	8867899	Discuss Ovation issues relating to Nossaman bar order with Receiver	Fates, Edward (Ted)	0.30	193.05	598,067.10	WO	HD	TR	_____
06/07/22	8859008	Call with counsel related to settlement motion plan and communications related to non-settling defendants.	Zaro, David	0.30	251.10	598,318.20	WO	HD	TR	_____
06/08/22	8856643	Call with counsel for CTC re: issues relating to Ovation objection to Nossaman bar order and order approving notice plan (.5) call with counsel for Ovation re: objection to Nossaman bar order and related issues	Fates, Edward (Ted)	1.10	707.85	599,026.05	WO	HD	TR	_____

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		(.4) emails with counsel for state court parties re: day 3 of Champion-Cain deposition (.2)								
06/08/22	8862431	Review/evaluate the CTC settlement plan order, follow-up with Receiver counsel (.4). follow-up on the email related to Nossman settlement and address Receiver response to Ovation (.3).	Zaro, David	0.70	585.90	599,611.95	WO	HD	TR	_____
06/09/22	8858726	Review notice of settlement with Chicago Title.	Kaup, John	0.10	31.50	599,643.45	WO	HD	TR	_____
06/10/22	8863779	Several emails, calls related to the CTC settlement, the return to investor calculation, follow-up.	Zaro, David	0.40	334.80	599,978.25	WO	HD	TR	_____
06/13/22	8868705	Analyze orders issued by state court relating to good faith settlements and demurrers filed by K. Peterson and Nossaman in Allred, Ovation and Yu cases (.4) call with counsel for CTC re: issues relating to 8/29 hearing and reply brief re: motion to approve global settlement (.3)	Fates, Edward (Ted)	0.70	450.45	600,428.70	WO	HD	TR	_____
06/24/22	8872419	Analyze correspondence from counsel for investors and counsel for CTC re: pending discovery disputes and hearings on same	Fates, Edward (Ted)	0.30	193.05	600,621.75	WO	HD	TR	_____
06/24/22	8874905	Several emails related to CTC cases and the Nossaman-Ovation issues and call with counsel to address Receiver's role/response.	Zaro, David	0.60	502.20	601,123.95	WO	HD	TR	_____

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06/27/22	8875158	Analyze ex parte application re: discovery rulings filed by CalPrivate Bank (.7) analyze CTC ex parte application to substitute in as plaintiff in Banc of California action against L. Peterson (.4) communications with counsel for CTC re: same (.2) advise Receiver re: same (.4) analyze CTC opposition to CalPrivate ex parte application (.3)	Fates, Edward (Ted)	2.00	1,287.00	602,410.95	WO	HD	TR	_____
06/27/22	8876724	Check status of state court litigation.	Kaup, John	0.10	31.50	602,442.45	WO	HD	TR	_____
06/28/22	8876113	Prepare for and attend hearing in state court on CalPrivate Bank's ex parte application concerning rulings on discovery motions	Fates, Edward (Ted)	0.80	514.80	602,957.25	WO	HD	TR	_____
06/29/22	8877488	Prepare for and attend teleconference with discovery referee in Chicago Title cases re: disputed discovery issues (.7) analyze CTC ex parte application to substitute as plaintiff in Banc of California action against L. Peterson (.4) analyze MSJ on breach of guaranty claim against L. Peterson (.4) discuss same with Receiver (.3)	Fates, Edward (Ted)	1.80	1,158.30	604,115.55	WO	HD	TR	_____
06/29/22	8879156	Review and respond to emails; research collect and forward summary judgment papers from Banc of California lawsuit; check status of state court litigation.	Kaup, John	0.50	157.50	604,273.05	WO	HD	TR	_____

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06/30/22	8879201	Attend state court hearing for CTC ex parte application to substitute in as plaintiff in Banc of California v. Laurie Peterson action pursuant to assignment of claim.	Fates, Edward (Ted)	0.60	386.10	604,659.15	WO	HD	TR	_____
07/01/22	8885007	Analyze document request and notice of deposition of M. Schiffman in Kim Funding v. CTC case	Fates, Edward (Ted)	0.20	137.70	604,796.85	WO	HD	TR	_____
07/05/22	8886408	Check for activity in state court lawsuits.	Kaup, John	0.10	33.75	604,830.60	WO	HD	TR	_____
07/05/22	8887868	Analysis of the dispute with Nossman/Ovation as to CTC settlement, review notes, emails and assess possible settlement approaches and follow-up (.7). Evaluate impact of Bank of California/CTC assignment on settlement with CTC (.4).	Zaro, David	1.10	985.05	605,815.65	WO	HD	TR	_____
07/06/22	8886765	Call with counsel for CTC re: issues relating to approval of settlement and oppositions to motion for approval	Fates, Edward (Ted)	0.40	275.40	606,091.05	WO	HD	TR	_____
07/06/22	8890422	Analysis of status and alternative approaches, possible proposal for the settlement with non-settling investor claimants/CalPrivate's status (.5). Call with counsel to reweiv the status and advise as to Receiver strategy/settlement (.3).	Zaro, David	0.80	716.40	606,807.45	WO	HD	TR	_____
07/07/22	8887548	Analyze amended discovery responses from CTC and correspondence relating to same (.4) call with counsel for	Fates, Edward (Ted)	1.30	895.05	607,702.50	WO	HD	TR	_____

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		Nossaman re: limited objection to CTC settlement approval motion and potential motion for relief from stay to name ANI as cross-defendant in lawsuit by Ovation (.6) advise Receiver re: same (.3)								
07/08/22	8890092	Check status of state court litigation.	Kaup, John	0.10	33.75	607,736.25	WO	HD	TR	_____
07/11/22	8890145	Analyze CTC briefs regarding sealing of discovery referee recommendations (.4) communications with SEC counsel re: motion for approval of CTC settlement (.2)	Fates, Edward (Ted)	0.60	413.10	608,149.35	WO	HD	TR	_____
07/11/22	8891965	Review of the Ovation action regarding Nossaman and follow-up research/analysis of the issues raised by the prospective Nossaman bar order, defenses, objections by Ovation(1.1). Evaluate the pending ex parte motion to set hearing as to Judge Pregerson discovery motion decisions, interview notes, review of the decisions (1.0).	Zaro, David	2.20	1,970.10	610,119.45	WO	HD	TR	_____
07/12/22	8891537	Analyze Nossaman ex parte application to continue trial date in state court actions, CTC and CalPrivate oppositions thereto (.9) communications with SEC counsel and counsel for CTC re: issues relating to settlement approval motion (.5)	Fates, Edward (Ted)	1.40	963.90	611,083.35	WO	HD	TR	_____
07/12/22	8893341	Emails/review court filings regarding Nossaman motion and CTC-Receiver-Nossaman settlement (.4). Several	Zaro, David	0.90	805.95	611,889.30	WO	HD	TR	_____

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		emails and call with counsel related to the expert hearing, the trial continuance, pending discovery dispute and potential impact upon bar orders (.5).								
07/13/22	8892623	Attend hearing on Nossaman ex parte motion for continuance of trial date in related state court cases (.7) advise Receiver re: same (.2) communications with counsel for CTC re: issues relating to settlement approval motion and Nossaman settlement (.1.1) communications with SEC counsel re: same (.5) advise Receiver re: same (.2)	Fates, Edward (Ted)	2.70	1,858.95	613,748.25	WO	HD	TR	_____
07/13/22	8894336	Evaluate the CTC bar order issues as to CalPrivate Bank and Nossaman, follow-up hearing on the ex parte application (.4). Call with Receiver counsel as to SEC and the bar order, follow-up as to CTC email and impact of change to agreement (.3).	Zaro, David	0.70	626.85	614,375.10	WO	HD	TR	_____
07/14/22	8893768	Analyze tentative ruling on CTC motion to seal for hearing on 7/15 (.4) analyze proposed stipulation re: deposition of L. Tyler (.2)	Fates, Edward (Ted)	0.60	413.10	614,788.20	WO	HD	TR	_____
07/14/22	8894959	Review and respond to emails regarding motion in Ovation 2 case; research, obtain and forward copies of court filings.	Kaup, John	0.40	135.00	614,923.20	WO	HD	TR	_____
07/15/22	8895108	Attend hearing in state court actions on CTC motion to seal portions of discovery referee recommended ruling (.7) analyze and advise on issues relating to	Fates, Edward (Ted)	1.40	963.90	615,887.10	WO	HD	TR	_____

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		Nossaman bar order and potential waiver of CTC exclusive right to negotiate re: same (.7)								
07/15/22	8900842	Several emails/analysis of proposed amendment to the settlement to address scope of bar order/alternative (.6). Evaluate bar order language, issues and emails with Receiver counsel, follow-up (.7).	Zaro, David	1.30	1,164.15	617,051.25	WO	HD	TR	_____
07/18/22	8896586	Discuss CTC potential waiver for Nossaman provision with Receiver (.3) communications with counsel for CTC and counsel for Nossaman re: same (.4)	Fates, Edward (Ted)	0.70	481.95	617,533.20	WO	HD	TR	_____
07/19/22	8901718	Communications with SEC counsel re: CTC settlement approval motion (.2) communications with counsel for Nossaman and counsel for CTC re: issues relating to Nossaman bar order (.8) communications with parties to state court actions re: new trial / discovery dates and related issues (.5)	Fates, Edward (Ted)	1.50	1,032.75	618,565.95	WO	HD	TR	_____
07/19/22	8902257	Several emails related to the State Court trials, discovery continuance and confer with counsel (.3). Evaluate the Nossaman-CTC document (.3).	Zaro, David	0.60	537.30	619,103.25	WO	HD	TR	_____
07/20/22	8899739	Communications with counsel for CTC and counsel for Nossaman re: issues relating to Nossaman bar order, approval of same and settlement (.2) communications with Receiver and counsel for parties re: proposed new trial	Fates, Edward (Ted)	0.60	413.10	619,516.35	WO	HD	TR	_____

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07/20/22	8902266	Several emails/call with counsel related to the CTC trial date, follow-up on the timing and Receiver response regarding trial.	Zaro, David	0.40	358.20	619,874.55	WO	HD	TR	_____
07/21/22	8900694	Meet and confer communications with counsel for parties relating to continued trial date and discovery dates in state court actions	Fates, Edward (Ted)	0.20	137.70	620,012.25	WO	HD	TR	_____
07/25/22	8903363	Communications with counsel for Wakefield investors re: filing of responses/joinders relating to CTC settlement approval motion (.3) analyze Wakefield ex parte application and Stevens/Kapur opposition brief (.7)	Fates, Edward (Ted)	1.00	688.50	620,700.75	WO	HD	TR	_____
07/25/22	8908485	Work with counsel to analyze and address the approach to oppositions/joinder requests to settlement motion and call regarding same (.7). Evaluate the initial briefs filed (1.60).	Zaro, David	2.30	2,059.65	622,760.40	WO	HD	TR	_____
07/26/22	8908554	Evaluate the numerous emails concerning the ending settlement motion, joinder issues, and brief review of oppositions and coordinate with counsel.	Zaro, David	1.20	1,074.60	623,835.00	WO	HD	TR	_____
07/27/22	8909498	Analysis and work on review of the oppositions to the CTC/Receiver settlement motion and bar, follow-up.	Zaro, David	0.70	626.85	624,461.85	WO	HD	TR	_____

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07/28/22	8909524	Several conferences with CTC's counsel related to the reply to oppositions to the CTC/Receiver motion (.6). Evaluate the opposition briefs from the investor holdouts and Peterson.	Zaro, David	2.00	1,791.00	626,252.85	WO	HD	TR	_____
07/28/22	8912856	Communications with counsel for CTC and investor parties re: new trial date and stipulation re: same	Fates, Edward (Ted)	0.20	137.70	626,390.55	WO	HD	TR	_____
07/29/22	8915666	Evaluate Ovation objection to the CTC/Receiver settlement and bar request, follow-up with counsel.	Zaro, David	0.80	716.40	627,106.95	WO	HD	TR	_____
07/31/22	8911000	Respond to investor inquiry regarding CTC settlement approval motion	Fates, Edward (Ted)	0.20	137.70	627,244.65	WO	HD	TR	_____
08/01/22	8916806	Analyze investor plaintiff oppositions to CTC settlement approval motion and Nossaman/CTC settlement, evidentiary objections and joinder filings (2.7) analyze order from state court on pending discovery motions (.2) analyze arguments for reply brief and hearing on CTC settlement approval motion (1.3) communications with counsel for CTC re: preparation of joint reply brief (.7)	Fates, Edward (Ted)	4.90	3,373.65	630,618.30	WO	HD	TR	_____
08/01/22	8917423	Prepare for/attend meeting with counsel and follow-up emails related to the Receiver response/reply to the briefs filed in opposition.	Zaro, David	1.40	1,253.70	631,872.00	WO	HD	TR	_____
08/02/22	8917550	Analyze and advise draft responses to evidentiary objections regarding CTC	Fates, Edward (Ted)	0.80	550.80	632,422.80	WO	HD	TR	_____

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		settlement approval motion								
08/02/22	8918297	Work on/address the Yoder declaration and outline for evidentiary objection (.7). Call with counsel and advice as to Receiver response/reply brief (.5). Work on Receiver's reply brief (.7).	Zaro, David	1.90	1,701.45	634,124.25	WO	HD	TR	_____
08/03/22	8918384	Further communications with counsel for parties to state court actions re: new trial date	Fates, Edward (Ted)	0.20	137.70	634,261.95	WO	HD	TR	_____
08/03/22	8920184	Several calls with counsel related to the Receiver's reply to the oppositions/legal issues (.7). Review declarations, Kim briefing and work on the Receiver's reply to the opposition (.9). Work on objections to declarations (.5).	Zaro, David	2.10	1,880.55	636,142.50	WO	HD	TR	_____
08/04/22	8918976	Analyze proposed stipulation relating to new trial date and revisions to same (.3) confer with counsel for CalPrivate re: same (.4) communications with other parties to state court actions re: same (.3) analyze issues re: CalPrivate opposition to CTC settlement approval motion and advise on strategy for reply to same (.6)	Fates, Edward (Ted)	1.60	1,101.60	637,244.10	WO	HD	TR	_____
08/04/22	8919890	Review and respond to emails and forward documents regarding stay order in state court litigation.	Kaup, John	0.20	67.50	637,311.60	WO	HD	TR	_____
08/04/22	8922901	Emails with counsel related to draft of the Receiver's reply brief and work on the revisions to the objections to Yoder	Zaro, David	0.90	805.95	638,117.55	WO	HD	TR	_____

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08/08/22	8921532	Analyze initial draft of joint reply brief from counsel for CTC (1.8) discuss same with Receiver (.3) call with counsel for CTC re: draft joint reply brief (.7) work on revisions to same (1.6)	Fates, Edward (Ted)	4.40	3,029.40	641,146.95	WO	HD	TR	_____
08/08/22	8925898	Several emails concerning the Chicago Title filings re: trial/the ongoing discovery issues (.6). Review CTC draft reply brief and call with counsel related to the draft reply (1.4). Call with counsel related to the reply briefs and follow-up (.4).	Zaro, David	2.40	2,149.20	643,296.15	WO	HD	TR	_____
08/09/22	8922381	Analyze CalPrivate oppositions to multiple motions by CTC to seal filings in state court actions (.4) work on joint reply brief in support of CTC settlement approval motion (4.7) communications with counsel for CTC re: same (.2) discuss same with Receiver (1.3)	Fates, Edward (Ted)	6.60	4,544.10	647,840.25	WO	HD	TR	_____
08/09/22	8925929	Emails related to the Receiver and CTC reply briefs related to the settlement motion (.5). Revise Receiver's joint reply brief and follow-up (1.4). Call/email with counsel to address the joint response and evaluate declaration and evidence issues (.4).	Zaro, David	2.30	2,059.65	649,899.90	WO	HD	TR	_____
08/10/22	8923761	Work on revisions to joint reply brief re: CTC settlement approval motion (.9) communications with counsel for CTC re: same (.3) discuss issues relating to joint reply brief and separate sections in	Fates, Edward (Ted)	1.90	1,308.15	651,208.05	WO	HD	TR	_____

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		same with Receiver (.7)								
08/10/22	8929335	Several emails/call with counsel as to the joint reply brief/issues (.8). Follow-up to review sections of brief/Receiver's position and further emails with Receiver counsel (.8).	Zaro, David	1.60	1,432.80	652,640.85	WO	HD	TR	_____
08/11/22	8924978	Communications with Receiver and counsel for CTC re: issues, approach to joint reply brief re: CTC settlement approval motion (1.4) address issues relating to evidentiary objections to Yoder declaration (.5)	Fates, Edward (Ted)	1.90	1,308.15	653,949.00	WO	HD	TR	_____
08/11/22	8929372	Work on drafts/revisions to objections to declarations from Yoder, Stevens, and Lister, follow-up (2.2). Evaluate Wakefield oppositions and related declarations, assess declarations and possible objections (.5). Call with counsel related to declarations and briefing (.5).	Zaro, David	3.80	3,402.90	657,351.90	WO	HD	TR	_____
08/12/22	8929429	Evaluate the joint CTC-Receiver draft of the reply brief, assess possible revisions, additional arguments possible and follow-up.	Zaro, David	1.40	1,253.70	658,605.60	WO	HD	TR	_____
08/13/22	8926860	Analyze CTC revisions to joint reply brief and discuss same with Receiver (1.1) analyze CTC omnibus reply relating to motions to seal documents in state court actions (.4)	Fates, Edward (Ted)	1.50	1,032.75	659,638.35	WO	HD	TR	_____

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08/14/22	8929492	Evaluate joint draft changes and email to counsel as the reply brief, revisions to the draft and email to counsel.	Zaro, David	0.70	626.85	660,265.20	WO	HD	TR	_____
08/15/22	8927969	Review CTC further edits to joint reply brief (.4) discuss same with Receiver (.3) communications with counsel for CTC re: same (.4) discuss evidentiary objections with counsel for CTC (.3) analyze Nossaman motions to file reply and file documents under seal (.4)	Fates, Edward (Ted)	1.70	1,170.45	661,435.65	WO	HD	TR	_____
08/15/22	8929444	Further review/revise draft joint reply brief, address CTC's comments, email advice and follow-up (1.6). Several calls with counsel regarding briefs (.4). Work on the revisions to the objections to the declarations (.8).	Zaro, David	2.80	2,507.40	663,943.05	WO	HD	TR	_____
08/16/22	8930479	Prepare for/attend the deposition of Gina Champion-Cain related to the Chicago Title Company lawsuit (6.5). Review emails concerning the court filing, follow-up (.6)	Zaro, David	7.10	6,358.05	670,301.10	WO	HD	TR	_____
08/17/22	8931532	Analyze testimony and issues from Day 3 of Champion-Cain deposition	Fates, Edward (Ted)	0.20	137.70	670,438.80	WO	HD	TR	_____
08/17/22	8932106	Follow-up on the deposition of Gina Champion-Cain, email memorandum to Receiver counsel.	Zaro, David	0.40	358.20	670,797.00	WO	HD	TR	_____
08/18/22	8931536	Analyze Ovation opposition to Nossaman request to file reply brief, Nossaman reply brief, and declarations of Donahue, Pott and Rosing (.9)	Fates, Edward (Ted)	2.20	1,514.70	672,311.70	WO	HD	TR	_____

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		analyze communications relating to CTC ex parte application for stay pending writ application (.4) communications with CTC re: issues relating to J. Peterson (.5) analyze CalPrivate opposition to CTC ex parte application for stay pending writ (.4)								
08/18/22	8934794	Several emails/assess the ongoing discovery dispute re: Chicago Title records/ex parte application and follow-up with counsel.	Zaro, David	0.40	358.20	672,669.90	WO	HD	TR	_____
08/19/22	8932950	Attend hearing in state court on CTC motions to seal and ex parte application to extend stay relating to writ petition	Fates, Edward (Ted)	1.70	1,170.45	673,840.35	WO	HD	TR	_____
08/19/22	8937969	Evaluate the further filings related to the discovery issues (.3). Call with counsel/Receiver related to the legal arguments re: to the settlement motion/prep of outline (.6).	Zaro, David	0.90	805.95	674,646.30	WO	HD	TR	_____
08/22/22	8934774	Communications with Receiver re: planning for 8/29 hearing	Fates, Edward (Ted)	0.20	137.70	674,784.00	WO	HD	TR	_____
08/22/22	8939138	Analysis concerning the settlement motion and prepare for oral argument, call with counsel for Receiver.	Zaro, David	0.40	358.20	675,142.20	WO	HD	TR	_____
08/23/22	8935954	Confer with Receiver and counsel re: arguments and strategy for 8/30 hearing on motion to approve CTC settlement (.8) communications with counsel for CTC re: plan for 8/30 hearing (.4) communications with counsel for CTC	Fates, Edward (Ted)	1.90	1,308.15	676,450.35	WO	HD	TR	_____

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		and law clerk regarding telephonic listen-only phone line for 8/30 hearing (.3) revisions to draft joint motion from counsel for CTC re: listen-only conference line for 8/30 hearing (.4)								
08/23/22	8939044	Meeting with Receiver and counsel to prepare for the oral argument related to the pending claim and settlement motions and follow-up with Receiver counsel.	Zaro, David	0.80	716.40	677,166.75	WO	HD	TR	_____
08/24/22	8937031	Analyze CTC responses and objections to interrogatories and requests for production in Fenley v. CTC state court action (.5) analyze issues and prepare arguments for 8/30 hearing on CTC settlement approval motion (1.8)	Fates, Edward (Ted)	2.30	1,583.55	678,750.30	WO	HD	TR	_____
08/25/22	8939073	Analysis of CalPrivate and Wakefield arguments and case cites in opposition to settlement approval motion	Fates, Edward (Ted)	1.80	1,239.30	679,989.60	WO	HD	TR	_____
08/25/22	8953898	Evaluate memorandum as to the oral argument in support of the settlement motion.	Zaro, David	0.50	447.75	680,437.35	WO	HD	TR	_____
08/26/22	8940206	Analyze issues relating to evidentiary objections for 8/31 hearing and prepare arguments re: same (.7) advise re: content for hearing binders for 8/31 hearing (.4)	Fates, Edward (Ted)	1.10	757.35	681,194.70	WO	HD	TR	_____
08/29/22	8942083	Call/emails with counsel for CTC re: issues relating to 8/31 hearing on settlement approval motion	Fates, Edward (Ted)	0.80	550.80	681,745.50	WO	HD	TR	_____

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08/30/22	8943349	Analyze and prepare arguments regarding CTC settlement approval motion and bar order for 8/31 hearing	Fates, Edward (Ted)	1.20	826.20	682,571.70	WO	HD	TR	_____
08/30/22	8953924	Evaluate the Court Minute Orders and Receiver memo as to upcoming oral argument, follow-up as to both settlement and claims motions.	Zaro, David	0.30	268.65	682,840.35	WO	HD	TR	_____
08/31/22	8945662	Prepare for and attend 8/31 hearing on CTC settlement approval motion (1.4)	Fates, Edward (Ted)	1.40	963.90	683,804.25	WO	HD	TR	_____
08/31/22	8949031	Review status of state court litigation; brief conference with Mr. Fates regarding hearing to approve settlement.	Kaup, John	0.20	67.50	683,871.75	WO	HD	TR	_____
09/01/22	8953930	Evaluate several emails concerning the hearing as to the claims motion and settlement motion, follow-up with counsel (.4). Review of CTC ex parte application following the hearing, counsel's responses and the Ovation Nossaman filings (.4).	Zaro, David	0.80	716.40	684,588.15	WO	HD	TR	_____
09/01/22	8976553	Analyze order directing supplemental briefing on settlement approval motion and advise Receiver re: same (.3) communication with settling investor re: 8/31 hearing (.3) review tentative ruling regarding Peterson motion to seal in state court actions (.2) analyze CTC ex parte application for temporary stay of state court action and CalPrivate opposition thereto (.8)	Fates, Edward (Ted)	1.60	1,101.60	685,689.75	WO	HD	TR	_____

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09/02/22	8976555	Assist Receiver in preparing update to investors regarding status of CTC settlement motion and 8/31 hearing (.3) attend hearing in state court on K. Peterson motion to seal and CTC motion for temporary stay (.6) analyze Ovation request to submit further briefing and Nossaman opposition thereto (.3)	Fates, Edward (Ted)	1.20	826.20	686,515.95	WO	HD	TR	_____
09/06/22	8953737	Call with counsel for CTC re: issues relating to supplemental brief for motion for approval of CTC settlement (.5) discuss same with Receiver (.3) analyze order regarding supplemental briefing as to Nossaman issues (.2) analyze state court order granting 30-day stay of cases (.1) advise Receiver re: same (.1)	Fates, Edward (Ted)	1.20	826.20	687,342.15	WO	HD	TR	_____
09/06/22	8955974	Evaluate the CTC ex parte application to stay, and the opposition brief/declaration from CalPrivate Bank, follow-up (.9). Analysis of the issues related CTC indemnity claims and Receiver's responses (.8). Follow-up to review court's order/emails related to stay (.2).	Zaro, David	1.90	1,701.45	689,043.60	WO	HD	TR	_____
09/07/22	8957060	Review/evaluate the filings concerning the State Court discovery, follow-up with counsel (.4). Assess the response to the order related to indemnity issues and research concerning Receiver's response (.9).	Zaro, David	1.30	1,164.15	690,207.75	WO	HD	TR	_____
09/07/22	8976927	Analyze equitable indemnity issues raised at 8/31 hearing and case law re: same	Fates, Edward (Ted)	0.80	550.80	690,758.55	WO	HD	TR	_____

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09/09/22	8957002	Call with counsel for CTC re: issues relating to supplemental brief regarding motion for approval of CTC settlement (.4) discuss same with Receiver (.7) work on supplemental brief (.9)	Fates, Edward (Ted)	2.00	1,377.00	692,135.55	WO	HD	TR	_____
09/09/22	8959897	Evaluate order related to briefing, the email with CTC/counsel, advice/email as to Receiver response, follow-up emails (.7). Analysis of and draft of narrative response to the indemnity issues and email (.7).	Zaro, David	1.40	1,253.70	693,389.25	WO	HD	TR	_____
09/12/22	8959384	Check status and recent case activity in state court litigation.	Kaup, John	0.10	33.75	693,423.00	WO	HD	TR	_____
09/12/22	8959902	Several emails concerning the pending claims motion and 2Budz ex parte application and follow-up (.4). Call with counsel related to the claims and settlement motion, stays of litigation and indemnity (.2).	Zaro, David	0.60	537.30	693,960.30	WO	HD	TR	_____
09/13/22	8959724	Call with counsel for CTC re: issues relating to supplemental briefs ordered by the Court (.3) advise Receiver re: same (.2)	Fates, Edward (Ted)	0.50	344.25	694,304.55	WO	HD	TR	_____
09/13/22	8963133	Follow-up on the Receiver's response as to the indemnity arguments, call with counsel related to Receiver response.	Zaro, David	0.40	358.20	694,662.75	WO	HD	TR	_____
09/14/22	8961510	Analyze supplemental brief filed by Kim Funding (.6) communications with counsel for CTC re: same (.3) analyze	Fates, Edward (Ted)	1.30	895.05	695,557.80	WO	HD	TR	_____

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		supplemental brief filed by Ovation (.4)								
09/14/22	8963242	Call/email with Receiver counsel related to the Receiver's brief as to indemnity/cross-claims and follow-up.	Zaro, David	0.40	358.20	695,916.00	WO	HD	TR	_____
09/15/22	8961648	Analyze supplemental briefs re: equitable indemnity filed by Nossaman and CTC (.9) discuss supplemental briefs with Receiver (.4)	Fates, Edward (Ted)	1.30	895.05	696,811.05	WO	HD	TR	_____
09/15/22	8966444	Evaluate the supplemental briefs filed in connection with the settlement approval motion by CTC/investor and Peterson counsel (.8). Emails with counsel as to the briefs, next steps and follow-up (.3).	Zaro, David	1.10	985.05	697,796.10	WO	HD	TR	_____
09/21/22	8968625	Respond to settling investor inquiry relating to approval of CTC settlement	Fates, Edward (Ted)	0.20	137.70	697,933.80	WO	HD	TR	_____
09/22/22	8975431	Review the status of the several pending motions related to CTC settlement and pending state court cases, call with Receiver counsel.	Zaro, David	0.40	358.20	698,292.00	WO	HD	TR	_____
09/26/22	8971511	Analyze and respond to inquiry from investor re: CTC settlement, Court approval, and timing of payment	Fates, Edward (Ted)	0.40	275.40	698,567.40	WO	HD	TR	_____
09/27/22	8975381	Review analyze and forward appellate decision in Peterson v. Mojdehi case.	Kaup, John	0.20	67.50	698,634.90	WO	HD	TR	_____
09/30/22	8977692	Communications with counsel for CTC and state court parties re: ex parte request to extend temporary stay of cases for additional 30 days	Fates, Edward (Ted)	0.30	206.55	698,841.45	WO	HD	TR	_____

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09/30/22	8978581	Several emails with the Receiver/ex parte to continue the stay and call with Receiver counsel.	Zaro, David	0.40	358.20	699,199.65	WO	HD	TR	_____
09/30/22	8981416	Review and respond to email regarding Sethee settlement payment.	Kaup, John	0.10	33.75	699,233.40	WO	HD	TR	_____
10/03/22	8984373	Analyze CTC ex parte application to extend temporary stay of state court cases	Fates, Edward (Ted)	0.40	275.40	699,508.80	WO	HD	TR	_____
10/07/22	8989586	Analyze filings in state court cases relating to extension of temporary stay of related cases and correspondence among parties re: same and 10/13 status conference	Fates, Edward (Ted)	0.40	275.40	699,784.20	WO	HD	TR	_____
10/13/22	8992965	Respond to inquiry from settling investor re: status of motion for court approval and timing (.2) attend status conference in state court Chicago Title cases re: extension of stay and related issues (.5)	Fates, Edward (Ted)	0.70	481.95	700,266.15	WO	HD	TR	_____
10/20/22	9000626	Analyze notice of order extending stay of state court cases filed by CTC	Fates, Edward (Ted)	0.10	68.85	700,335.00	WO	HD	TR	_____
10/20/22	9003431	Analysis of prospective settlement with CalPrivate, analysis of possible appeals of the settlement approval order, stay issues and impact upon Receiver distribution.	Zaro, David	0.40	358.20	700,693.20	WO	HD	TR	_____
10/27/22	9007403	Communications with counsel for CTC and other state court parties re: further extension of temporary stay	Fates, Edward (Ted)	0.20	137.70	700,830.90	WO	HD	TR	_____

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10/31/22	9010765	Analyze CTC ex parte application for extension of temporary stay of state court actions (.3) analyze settlement communications from counsel for Fenley et al. investors (.2) discuss same with Receiver (.4)	Fates, Edward (Ted)	0.90	619.65	701,450.55	WO	HD	TR	_____
11/01/22	9016405	Communications with counsel for CTC re: settlement communication from counsel for Fenley et al. investors (.5) communications with counsel for Fenley et al. investors re:same (.3)	Fates, Edward (Ted)	0.80	550.80	702,001.35	WO	HD	TR	_____
11/01/22	9018148	Evaluate the Zinder parties offer to accept CTC settlement and impact on proceedings, emails with Receiver/counsel related to the settlement, motion and appeals.	Zaro, David	0.70	626.85	702,628.20	WO	HD	TR	_____
11/02/22	9020694	Emails related to the Armstrong and Zinder group prospective withdrawal of objection to the settlement with CTC.	Zaro, David	0.30	268.65	702,896.85	WO	HD	TR	_____
11/02/22	9042095	Communications with counsel for Fenley et al. investors re: CTC settlement	Fates, Edward (Ted)	0.30	206.55	703,103.40	WO	HD	TR	_____
11/03/22	9017989	Follow up communications with counsel for Fenley et al. investors (.4) communications with counsel for CTC re: same (.5) advise Receiver re: same (.2)	Fates, Edward (Ted)	1.10	757.35	703,860.75	WO	HD	TR	_____
11/04/22	9019245	Call with counsel for CTC re: joinder in settlement by Fenley et al. investors and steps to effectuate same	Fates, Edward (Ted)	0.40	275.40	704,136.15	WO	HD	TR	_____

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11/07/22	9020846	Calls/emails with counsel for CTC re: issues relating to joinder in CTC settlement by Fenley et al. investors and potentially by Wakefield investors (.7) communications with counsel for Wakefield investors (.4)	Fates, Edward (Ted)	1.10	757.35	704,893.50	WO	HD	TR	_____
11/09/22	9025487	Evaluate email communication and analysis of negotiations with CalPrivate and third party objectors/Receiver's position and develop strategy (.3). Call with counsel related to the settlement negotiations, follow-up (.3).	Zaro, David	0.60	537.30	705,430.80	WO	HD	TR	_____
11/10/22	9024627	Respond to inquiry from settling investor regarding status/timing of order on settlement approval motion	Fates, Edward (Ted)	0.20	137.70	705,568.50	WO	HD	TR	_____
11/14/22	9027478	Communications with counsel for CTC and counsel for investor parties regarding further continuance of temporary stay of state court cases	Fates, Edward (Ted)	0.40	275.40	705,843.90	WO	HD	TR	_____
11/14/22	9030048	Evaluate status of the stay of actions in state court to account for the pending motions in federal court, settlement and emails among counsel.	Zaro, David	0.40	358.20	706,202.10	WO	HD	TR	_____
11/15/22	9028621	Communications with counsel for Wakefield Parties regarding CTC settlement, possible joinder, and related issues	Fates, Edward (Ted)	0.80	550.80	706,752.90	WO	HD	TR	_____
11/17/22	9031305	Call with counsel for CTC re: Wakefield and Fenley objections to global	Fates, Edward (Ted)	0.40	275.40	707,028.30	WO	HD	TR	_____

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		settlement, potential withdrawal / release of same, and related issues								
11/18/22	9032372	Attend status conference in pending state court cases against CTC	Fates, Edward (Ted)	0.80	550.80	707,579.10	WO	HD	TR	_____
11/23/22	9036551	Analyze approval orders re: CTC global settlement, objections and bar orders (.5) advise Receiver re: same (.2)	Fates, Edward (Ted)	0.70	481.95	708,061.05	WO	HD	TR	_____
11/23/22	9040330	Review/evaluate the Court orders related to CTC settlement/objections and Nossaman.	Zaro, David	1.20	1,074.60	709,135.65	WO	HD	TR	_____
11/28/22	9047645	Evaluate court's opinions and orders related to Chicago Title settlement, the related objections and Nossaman (1.1); call/email with receiver, counsel as to next steps (.3).	Zaro, David	1.40	1,253.70	710,389.35	WO	HD	TR	_____
11/29/22	9040291	Communications with counsel for Champion-Cain re: court approval of CTC global settlement, anticipated distributions to investors and related issues (.8) communication with counsel for CTC re: settlement approval, payments and unrepresented investors (.6) discuss same with Receiver (.2)	Fates, Edward (Ted)	1.60	1,101.60	711,490.95	WO	HD	TR	_____
11/30/22	9041660	Communications with Receiver and counsel for CTC re: settlement payment and wire transfer details (.3) communications with unrepresented investor re: settlement approval and payment (.2)	Fates, Edward (Ted)	0.50	344.25	711,835.20	WO	HD	TR	_____

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12/01/22	9047064	Call with counsel for CTC re: potential waiver of appeal and joinder in settlement by Fenley et al. investors	Fates, Edward (Ted)	0.40	275.40	712,110.60	WO	HD	TR	_____
12/12/22	9055991	Respond to inquiry from settling investor re: settlement payment from Chicago Title	Fates, Edward (Ted)	0.30	206.55	712,317.15	WO	HD	TR	_____
12/13/22	9056752	Communications with Receiver and counsel for CTC re: settlement payment to receivership and settlement payments to joining investors, wire confirmation and additional details (.8) communications with joining investors re: same (.4)	Fates, Edward (Ted)	1.20	826.20	713,143.35	WO	HD	TR	_____
12/13/22	9058152	Call with counsel to address the CTC payment per settlement/amount and timing.	Zaro, David	0.30	268.65	713,412.00	WO	HD	TR	_____
12/15/22	9058849	Communications with counsel for Fenley investors and counsel for CTC re: issues relating to CTC settlement and payments	Fates, Edward (Ted)	0.40	275.40	713,687.40	WO	HD	TR	_____
12/15/22	9062334	Evaluate emails as to settlement proposal from investor groups and call with counsel as to Zinder/Armstrong parties and the Receiver's CTC's response.	Zaro, David	0.60	537.30	714,224.70	WO	HD	TR	_____
12/16/22	9062351	Follow-up on the CTC agreement/payment of the settlement amounts and prospective resolution of the investor plaintiff cases/claims.	Zaro, David	0.40	358.20	714,582.90	WO	HD	TR	_____

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12/20/22	9067892	Call from/response and call with Ms. Donahue related to the CTC settlement, investor plaintiff's agreement to waive appeals.	Zaro, David	0.40	358.20	714,941.10	WO	HD	TR	_____
12/22/22	9069953	Evaluate the appeal notices from Ovation and Peterson, then draft email to Receiver related to the prospective resolution of investor claims/Zinder.	Zaro, David	0.70	626.85	715,567.95	WO	HD	TR	_____
12/23/22	9070056	Several emails/calls with Chicago Title counsel and Receiver related to the settlement/appeals and pending motion.	Zaro, David	0.80	716.40	716,284.35	WO	HD	TR	_____
12/27/22	9070113	Evaluate the Court of Appeals orders related to the appeals filed by Peterson and Ovation parties, follow-up.	Zaro, David	0.60	537.30	716,821.65	WO	HD	TR	_____
12/29/22	9069775	Analyze notices of appeal of orders relating to CTC and Nossaman settlements and bar orders filed by K. Peterson and Ovation (.5) analyze requests for dismissal filed in CTC state court actions by counsel for CTC and counsel for Heidrich/Orr parties (.4)	Fates, Edward (Ted)	0.90	619.65	717,441.30	WO	HD	TR	_____
01/03/23	9076667	Analysis of the Ovation/Peterson appeals and prospective CalPrivate, call with counsel related to strategy (.3). Follow-up call with Receiver counsel related to the two appeals/mediation and follow-up.	Zaro, David	0.70	626.85	718,068.15	WO	HD	TR	_____
01/03/23	9088383	Analyze and advise on issues relating to appeals of settlement order filed by Peterson and Ovation (.4)	Fates, Edward (Ted)	1.10	757.35	718,825.50	WO	HD	TR	_____

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		communications with counsel for CTC re: settlement payment and dismissal of state court action (.4) work on request for dismissal (.3)								
01/04/23	9076306	Analyze appellate mediation issues for Peterson and Ovation appeals	Fates, Edward (Ted)	0.50	344.25	719,169.75	WO	HD	TR	_____
01/05/23	9077282	Communications with counsel for CTC re: settlement payments to joining investors (.4) analyze appeal strategy and issues (.3)	Fates, Edward (Ted)	0.70	481.95	719,651.70	WO	HD	TR	_____
01/05/23	9080101	Analysis of the dispute with Nossaman/Ovation as to CTC settlement, review notes, emails and assess possible settlement approaches and follow-up (.7). Evaluate impact of Bank of California/CTC assignment on settlement with CTC (.4).	Zaro, David	1.10	985.05	720,636.75	WO	HD	TR	_____
01/11/23	9082436	Communications with counsel for CTC re: settlement payments to investors (.2) analyze order re: Ninth Circuit mediation program for pending appeals (.1)	Fates, Edward (Ted)	0.30	206.55	720,843.30	WO	HD	TR	_____
01/17/23	9088624	Call related to CTC appeals, the prospective settlement negotiations, follow-up as to impact on the Receiver's plan.	Zaro, David	0.40	358.20	721,201.50	WO	HD	TR	_____
01/18/23	9087755	Call with counsel for Nossaman regarding Ovation and Peterson appeals of settlement bar orders and related issues	Fates, Edward (Ted)	0.50	344.25	721,545.75	WO	HD	TR	_____

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01/24/23	9104332	Communications with parties to state court actions regarding continuance of 1/26 status conference (.3) analyze and discuss distributions of CTC settlement funds to plaintiff investors with Receiver (.7) call with Court law clerk re: timing issue relating to same and pending claims motion (.2) communications with counsel for Fenley et al. investors re: same (.7)	Fates, Edward (Ted)	1.90	1,308.15	722,853.90	WO	HD	TR	_____
01/25/23	9104357	Discuss Global settlement and distribution issues with Receiver (.3) communications with counsel for Fenley et al. investors and counsel for CTC (.5) communications with counsel for CTC regarding status conference in state court actions scheduled for 1/27 and requests for dismissal of bar claims (.4)	Fates, Edward (Ted)	1.20	826.20	723,680.10	WO	HD	TR	_____
01/26/23	9095652	Communications with counsel for CTC and counsel for Fenley et al. investors regarding Chicago Title settlement and distribution of settlement funds by Receiver (.5) advise Receiver re: same (.3) analyze request for stay and dismissals filed by CTC in state court actions and proposed stay / dismissal order (.6)	Fates, Edward (Ted)	1.40	963.90	724,644.00	WO	HD	TR	_____
01/26/23	9099353	Evaluate several filings and emails concerning the pending actions/appeals and prospective stay motion (.4). Follow-up with counsel as to the CTC settlement/appeal timing and briefing (.2).	Zaro, David	0.60	537.30	725,181.30	WO	HD	TR	_____

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01/27/23	9099465	Evaluate several emails and court filings related to the appeals, mediation , the stay motion in state court and confer with Receiver counsel.	Zaro, David	0.70	626.85	725,808.15	WO	HD	TR	_____
01/27/23	9104397	Analyze issues re: CalPrivate appeal of Chicago Title settlement and bar order (.3) communications with counsel for CTC re: status conference in state court cases, court rulings, and next steps (.4)	Fates, Edward (Ted)	0.70	481.95	726,290.10	WO	HD	TR	_____
01/30/23	9099626	Communications with counsel for Fenley et al. investors and Receiver re: wire instructions for settlement distribution to Tarditi, Fenley and Stevens	Fates, Edward (Ted)	0.60	413.10	726,703.20	WO	HD	TR	_____
01/31/23	9106795	Conference with Receiver/counsel related to the impact of appeals on resolution of Peterson case and CalPrivate appeal of the settlement motion order, follow-up.	Zaro, David	0.40	358.20	727,061.40	WO	HD	TR	_____
02/01/23	9116078	Communications with Receiver and counsel for Fenley et al. investors re: receipt of settlement distributions (.3) communications with counsel for CTC re: appeals of settlement bar orders (.4)	Fates, Edward (Ted)	0.70	481.95	727,543.35	WO	HD	TR	_____
02/02/23	9108795	Research/analysis of the standard to set aside the stay order per appeal, follow-up with counsel.	Zaro, David	0.80	716.40	728,259.75	WO	HD	TR	_____
02/02/23	9116081	Call/emails with counsel for CTC re: appeals of bar orders, potential consolidation of same, scheduling,	Fates, Edward (Ted)	0.90	619.65	728,879.40	WO	HD	TR	_____

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		briefing, and related issues (.7) advise Receiver re: same (.2)								
02/03/23	9109532	Analyze mediation statement filed by CalPrivate in appeal of settlement bar order	Fates, Edward (Ted)	0.30	206.55	729,085.95	WO	HD	TR	_____
02/06/23	9109693	Communications with counsel for CTC and other parties to pending appeals re: potential consolidation of appeals	Fates, Edward (Ted)	0.40	275.40	729,361.35	WO	HD	TR	_____
02/06/23	9111358	Evaluate the order concerning the motion to stay litigation pending the appeal (.4). Analysis of the CalPrivate claim as to the Peterson settlement, assess Receiver response/strategy (.4).	Zaro, David	0.80	716.40	730,077.75	WO	HD	TR	_____
02/07/23	9112315	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	730,704.60	WO	HD	TR	_____
02/10/23	9118597	Communications with counsel for CTC regarding potential consolidation of appeals of settlement bar orders	Fates, Edward (Ted)	0.30	206.55	730,911.15	WO	HD	TR	_____
02/14/23	9119841	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	Zaro, David	1.30	1,164.15	732,075.30	WO	HD	TR	_____

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		steps, Receiver response (.4).								
03/17/23	9156353	Several emails/call with Receiver counsel related to proposed consolidation of appeals, review appellate issue.	Zaro, David	0.40	358.20	732,433.50	WO	HD	TR	_____
03/20/23	9156371	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	733,418.55	WO	HD	TR	_____
03/21/23	9165301	Communications with Receiver and counsel for CTC regarding settlement payments to investors and inquiries from investors regarding 1099's	Fates, Edward (Ted)	0.40	275.40	733,693.95	WO	HD	TR	_____
03/28/23	9163738	Analyze communications from counsel for Peterson, counsel for Ovation, counsel for CTC, and counsel for Nossaman regarding extension of opening brief deadline for settlement bar order appeals, responses to same	Fates, Edward (Ted)	1.10	757.35	734,451.30	WO	HD	TR	_____
03/28/23	9173741	Follow up on the appellate notices, filings/mediation statements and assess 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	735,078.15	WO	HD	TR	_____

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03/30/23	9172105	Analyze Ovation motion to extend deadline for opening brief in appeal of Nossaman settlement bar order (.3) Analyze Peterson motion to extend deadline for opening briefs in appeals of CTC settlement bar order and claims and distribution order (.5) advise Receiver re: same (.3)	Fates, Edward (Ted)	1.10	757.35	735,835.50	WO	HD	TR	_____
03/31/23	9169410	Review order granting extension of deadline for opening brief and advise Receiver re: same	Fates, Edward (Ted)	0.20	137.70	735,973.20	WO	HD	TR	_____
04/04/23	9177571	Review/evaluate appeal, mediation related order and issues, Receiver response to the court of appeals mediator.	Zaro, David	0.40	358.20	736,331.40	WO	HD	TR	_____
04/17/23	9186263	Call with counsel for CalPrivate Bank regarding extension of stay of appeal of CTC settlement bar order due to pending settlement	Fates, Edward (Ted)	0.30	206.55	736,537.95	WO	HD	TR	_____
04/20/23	9191396	Follow-up o the issues and timing as to the Peterson appeal, the impact o the Receiver's distribution and call/email with counsel.	Zaro, David	0.60	537.30	737,075.25	WO	HD	TR	_____
04/24/23	9193289	Communications with counsel for CTC regarding issues relating to CalPrivate appeal of settlement bar order (.3) analyze CalPrivate motion to extend stay of appeal pending decision on settlement approval motion (.2)	Fates, Edward (Ted)	0.50	344.25	737,419.50	WO	HD	TR	_____

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04/27/23	9197533	Analyze CalPrivate's unopposed motion for dismissal of appeal of CTC settlement bar order	Fates, Edward (Ted)	0.20	137.70	737,557.20	WO	HD	TR	_____
07/12/23	9278364	Review of the Ovation appellate brief concerning the CTC settlement and impact on Nossaman claims, follow-ups.	Zaro, David	0.40	387.00	737,944.20	WO	HD	TR	_____
07/13/23	9281326	Evaluate several filings with the Ninth Circuit by Ovation and Peterson parties.	Zaro, David	0.40	387.00	738,331.20	WO	HD	TR	_____
07/14/23	9281340	Evaluate/analysis of the Peterson appellate brief and the issues raised by Peterson in the appellate brief arising out of the order approving the settlement with CTC and the Ovation management impact on receivership/response.	Zaro, David	1.60	1,548.00	739,879.20	WO	HD	TR	_____
07/17/23	9279600	Analyze Peterson opening brief in appeal of CTC settlement bar order (1.3) analyze Ovation opening brief (.6) communications with counsel for CTC and counsel for Nossaman regarding responsive briefs and extension of deadline for same (.3)	Fates, Edward (Ted)	2.20	1,633.50	741,512.70	WO	HD	TR	_____
07/18/23	9283755	Conference with Receiver counsel related to the appeals of the settlement order with CTC, litigation bar as to third parties, receiver's response.	Zaro, David	0.80	774.00	742,286.70	WO	HD	TR	_____
07/24/23	9286278	Communications with counsel for parties to pending appeals regarding extension of time for responding briefs	Fates, Edward (Ted)	0.20	148.50	742,435.20	WO	HD	TR	_____

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08/09/23	9325660	Communications with counsel for CTC regarding responding briefs for Peterson appeal of settlement bar order	Fates, Edward (Ted)	0.30	222.75	742,657.95	WO	HD	TR	_____
08/15/23	9326221	Analysis of legal issues, arguments and strategy for answering brief in Peterson appeal of CTC settlement bar order	Fates, Edward (Ted)	2.40	1,782.00	744,439.95	WO	HD	TR	_____
08/28/23	9323686	Initial research and analysis regarding Peterson's claims in 9th Circuit Kim Funding appeal (2.1).	Robichaud, James	2.10	859.95	745,299.90	WO	HD	TR	_____
08/31/23	9327708	Work on answering brief for Peterson appeal of CTC settlement bar order	Fates, Edward (Ted)	1.70	1,262.25	746,562.15	WO	HD	TR	_____
09/01/23	9334115	Work on answering brief for Peterson appeal of CTC settlement bar order	Fates, Edward (Ted)	1.60	1,188.00	747,750.15	WO	HD	TR	_____
09/06/23	9335690	Communications with counsel for Peterson regarding emergency motion for stay of appellate briefing (.9) analyze issues re: same (.6) communications with counsel for CTC re: legal issues and opposition (.8) discuss same with Receiver (.5)	Fates, Edward (Ted)	2.80	2,079.00	749,829.15	WO	HD	TR	_____
09/07/23	9336834	Work on answering brief for Peterson appeal of CTC settlement bar order (.5) communications with counsel for Peterson, counsel for CTC, and counsel for Nossaman regarding Peterson motion to stay briefing in appeal of CTC bar order (.6) discuss same with Receiver (.2)	Fates, Edward (Ted)	1.30	965.25	750,794.40	WO	HD	TR	_____

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09/11/23	9339161	Analyze Peterson motion to stay briefing in appeal due to Purdue case at US Supreme Court (.8) communications with counsel for CTC and counsel for Nossaman regarding same and Nossaman request to extend deadline for answering brief (.5)	Fates, Edward (Ted)	1.30	965.25	751,759.65	WO	HD	TR	_____
09/14/23	9342765	Communications with counsel for Nossaman and counsel for Peterson regarding briefing schedule and extension of deadline for answering briefs	Fates, Edward (Ted)	0.30	222.75	751,982.40	WO	HD	TR	_____
09/15/23	9344416	Communications with counsel for CTC regarding opposition to Peterson motion to stay appeal of CTC bar order (.4) work on joinder to same (.2)	Fates, Edward (Ted)	0.60	445.50	752,427.90	WO	HD	TR	_____
09/16/23	9344944	Discuss facts related to opposition to Peterson motion to stay appeals with counsel for CTC	Fates, Edward (Ted)	1.10	816.75	753,244.65	WO	HD	TR	_____
09/18/23	9346394	Revise and finalize joinder to CTC opposition to Peterson motion to stay bar order appeal	Fates, Edward (Ted)	0.30	222.75	753,467.40	WO	HD	TR	_____
09/19/23	9347877	Communications with counsel for CTC regarding facts related Peterson appeal of CTC settlement bar order (.5) analyze trial court record re: same (.4)	Fates, Edward (Ted)	0.90	668.25	754,135.65	WO	HD	TR	_____
09/22/23	9352832	Communications with SEC counsel regarding pending Peterson appeals	Fates, Edward (Ted)	0.20	148.50	754,284.15	WO	HD	TR	_____

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09/26/23	9354335	Analyze Peterson reply regarding motion to stay briefing in pending appeals (.4) advise Receiver re: same (.2) work on answering brief for Peterson appeal of CTC settlement bar order (.9)	Fates, Edward (Ted)	1.50	1,113.75	755,397.90	WO	HD	TR	_____
09/27/23	9356282	Communications with counsel for CTC regarding answering briefs for Peterson appeal of CTC settlement bar order	Fates, Edward (Ted)	0.30	222.75	755,620.65	WO	HD	TR	_____
09/29/23	9357983	Analyze and revise answering brief for Peterson appeal of CTC settlement bar order	Fates, Edward (Ted)	0.70	519.75	756,140.40	WO	HD	TR	_____
10/02/23	9364741	Communications with counsel for CTC regarding answering briefs for Peterson appeal of CTC settlement bar order (.3) work on Receiver's answering brief (1.9)	Fates, Edward (Ted)	2.30	1,707.75	757,848.15	WO	HD	TR	_____
10/03/23	9365408	Analyze CTC draft answering brief and arguments therein for Peterson appeal of CTC settlement bar order (2.2) discuss same with Receiver (.4)	Fates, Edward (Ted)	2.60	1,930.50	759,778.65	WO	HD	TR	_____
10/04/23	9366714	Discuss issues and strategy relating to CTC draft answering brief with Receiver (.7) communications with counsel for CTC re: same (.9) work on proposed revisions to CTC draft brief (1.2) analyze draft answering brief from counsel for Nossaman in Ovation appeal of Nossaman settlement bar order (1.9)	Fates, Edward (Ted)	4.70	3,489.75	763,268.40	WO	HD	TR	_____
10/05/23	9367710	Communications with Receiver and counsel for CTC regarding issues for answering brief in Peterson appeal of	Fates, Edward (Ted)	2.40	1,782.00	765,050.40	WO	HD	TR	_____

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		settlement bar order (.7) work on proposed comments to Nossaman answering brief in Ovation appeal (.8) discuss same with counsel for Nossaman (.7) discuss same with Receiver (.2)								
10/06/23	9369595	Communications with counsel for CTC regarding answering brief in Peterson appeal of settlement bar order (.7) communications with counsel for Nossaman regarding Nossaman opening brief in Ovation appeal of bar order (.5) communications with counsel for Ovation regarding Receiver deadline to join Nossaman brief (.2)	Fates, Edward (Ted)	1.40	1,039.50	766,089.90	WO	HD	TR	_____
10/07/23	9370914	Communications with counsel for CTC and counsel for Nossaman re: issues for answering briefs and joinders in Peterson and Ovation appeals of bar orders	Fates, Edward (Ted)	0.90	668.25	766,758.15	WO	HD	TR	_____
10/09/23	9371420	Analyze potential amicus issues relating to Purdue Pharma appeal and US Supreme Court consideration of nonconsensual third party releases in bankruptcy (.7) communications with Receiver and counsel for CTC re: same and issues for answering brief and joinder to same (.9)	Fates, Edward (Ted)	1.60	1,188.00	767,946.15	WO	HD	TR	_____
10/10/23	9373282	Analyze CTC revised answering brief and issues related thereto (.8) work on joinder to same (.4) discuss same and issues relating to possible amicus brief	Fates, Edward (Ted)	2.70	2,004.75	769,950.90	WO	HD	TR	_____

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		with Receiver (.6) communications with counsel for CTC re: same and amicus brief issue (.9)								
10/12/23	9375621	Analyze Nossaman revised answering brief and potential joinder to same (1.1) discuss same with counsel for Nossaman (.6) analyze letter submitted to Ninth Circuit by counsel for Peterson re: motion to stay briefing (.2)	Fates, Edward (Ted)	1.90	1,410.75	771,361.65	WO	HD	TR	_____
10/13/23	9376972	Communications with counsel for Nossaman regarding answering brief in Ovation appeal and joinder to same	Fates, Edward (Ted)	0.40	297.00	771,658.65	WO	HD	TR	_____
10/17/23	9381153	Work on joinder to Nossaman answering brief in Ovation appeal of settlement bar order	Fates, Edward (Ted)	0.40	297.00	771,955.65	WO	HD	TR	_____
10/19/23	9383791	Review revised answering brief from counsel for Nossaman (.5) communications with counsel for Nossaman re: same (.3)	Fates, Edward (Ted)	0.80	594.00	772,549.65	WO	HD	TR	_____
10/20/23	9386791	Finalize joinder to Nossaman answering brief in Ovation appeal of settlement bar order	Fates, Edward (Ted)	0.30	222.75	772,772.40	WO	HD	TR	_____
10/24/23	9389493	Analyze order denying Peterson motion to stay briefing in appeal of CTC settlement bar order (.2) advise Receiver re: same (.1) communications with counsel for CTC re: same (.3)	Fates, Edward (Ted)	0.60	445.50	773,217.90	WO	HD	TR	_____
10/27/23	9392902	Attend status conference in pending state court actions against Chicago Title	Fates, Edward (Ted)	0.60	445.50	773,663.40	WO	HD	TR	_____

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11/08/23	9407891	Communications with counsel for Peterson and counsel for CTC re: Peterson request for short extension on deadline for reply brief in appeal of CTC settlement bar order	Fates, Edward (Ted)	0.30	222.75	773,886.15	WO	HD	TR	_____
11/17/23	9430479	Communications with counsel for Ovation re: appeal of Nossaman bar order	Fates, Edward (Ted)	0.40	297.00	774,183.15	WO	HD	TR	_____
12/04/23	9436108	Communications with counsel for CTC regarding oral argument, potential dates and notice from Ninth Circuit re: same (.7) call from investor to discuss Peterson appeal of bar order and related issues (.4)	Fates, Edward (Ted)	1.10	816.75	774,999.90	WO	HD	TR	_____
12/11/23	9444607	Analyze Ovation reply brief in Ovation appeal of Nossaman settlement bar order	Fates, Edward (Ted)	1.20	891.00	775,890.90	WO	HD	TR	_____
12/14/23	9448057	Analyze Peterson reply brief in appeal of CTC settlement bar order	Fates, Edward (Ted)	0.80	594.00	776,484.90	WO	HD	TR	_____
01/10/24	9473516	Analyze CTC motion to strike portions of Peterson reply brief in appeal of settlement bar order and advise Receiver re: same	Fates, Edward (Ted)	0.60	445.50	776,930.40	WO	HD	TR	_____
01/19/24	9482986	Analyze Peterson opposition to CTC motion to strike portions of reply brief or file sur-reply in appeal of settlement bar order	Fates, Edward (Ted)	0.50	371.25	777,301.65	WO	HD	TR	_____

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01/26/24	9492208	Analyze Chicago Title reply brief re: motion to strike portions of answering brief or leave to file sur-reply	Fates, Edward (Ted)	0.40	297.00	777,598.65	WO	HD	TR	_____
01/29/24	9494280	Analyze issues re: oral argument in appeals (.2) communications with counsel for parties to pending appeals regarding order scheduling oral argument and potential rescheduling of same due to conflicts (.4) analyze Nossaman motion to reschedule oral argument (.2)	Fates, Edward (Ted)	0.80	594.00	778,192.65	WO	HD	TR	_____
02/01/24	9499556	Communications with counsel for Nossaman, Ovation, CTC and other parties to appeals regarding rescheduling of 4/10 oral argument (.4) analyze Nossaman filing relating to scheduling (.2)	Fates, Edward (Ted)	0.60	445.50	778,638.15	WO	HD	TR	_____
02/05/24	9504015	Communications with counsel for parties to appeals regarding rescheduling of oral argument	Fates, Edward (Ted)	0.20	148.50	778,786.65	WO	HD	TR	_____
02/09/24	9508382	Analyze order rescheduling oral argument in Peterson and Ovation appeals and advise Receiver re: same	Fates, Edward (Ted)	0.20	148.50	778,935.15	WO	HD	TR	_____
02/14/24	9513945	Review notice from Ninth Circuit regarding scheduling of oral argument and prepare form regarding unavailability for certain dates (.4) communications with counsel for Peterson, counsel for CT, counsel for Nossaman, and counsel for Ovation re: same (.4)	Fates, Edward (Ted)	0.80	594.00	779,529.15	WO	HD	TR	_____

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02/15/24	9518697	Respond to Ninth Circuit clerk regarding availability for potential hearing dates	Fates, Edward (Ted)	0.20	148.50	779,677.65	WO	HD	TR	_____
02/21/24	9521056	Communications with counsel for CTC re: oral argument and timing issues	Fates, Edward (Ted)	0.40	297.00	779,974.65	WO	HD	TR	_____
02/23/24	9523364	Attend status conference in pending state court actions against Chicago Title	Fates, Edward (Ted)	0.80	594.00	780,568.65	WO	HD	TR	_____
06/27/24	9675288	Analyze Supreme Court decision in Purdue Pharma case and potential impact on pending appeal of Chicago Title settlement bar order (.7) discuss same with Receiver (.2)	Fates, Edward (Ted)	0.90	668.25	781,236.90	WO	HD	TR	_____
07/10/24	9689119	Communications with counsel for Chicago Title and counsel for Nossaman firm regarding oral argument for pending appeals, filings re: same and Purdue decision	Fates, Edward (Ted)	1.20	966.60	782,203.50	WO	HD	TR	_____
07/11/24	9690704	Communications with counsel for Peterson, counsel for Chicago Title, and counsel for Nossaman regarding oral argument and time allocation for arguments	Fates, Edward (Ted)	0.60	483.30	782,686.80	WO	HD	TR	_____
07/12/24	9691796	Communications with counsel for Chicago Title and counsel for Nossaman re: oral argument for pending appeals	Fates, Edward (Ted)	0.30	241.65	782,928.45	WO	HD	TR	_____
07/18/24	9696578	Analyze letter re: new authorities filed by counsel for Ovation in appeals	Fates, Edward (Ted)	0.40	322.20	783,250.65	WO	HD	TR	_____

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Fees for Matter 378827.00013.(Chicago Title Litigation)

Trans Date	Index	Description of Service Rendered	Timekeeper	Hours	Fees	Sum	Circle Action			
07/19/24	9698825	Analyze order partially granting additional argument time for appeals (.1) communications with counsel for appellees re: same (.1)	Fates, Edward (Ted)	0.20	161.10	783,411.75	WO	HD	TR	_____
07/22/24	9701363	Analyze draft FRAP 28j letters from counsel for CTC and counsel for Nossaman (.7) address communications from court clerk regarding time split for oral argument (.2) advise Receiver re: same (.4) communications with counsel for CTC and counsel for Nossaman (.5)	Fates, Edward (Ted)	1.80	1,449.90	784,861.65	WO	HD	TR	_____
07/23/24	9704432	Communications with Receiver, counsel for CTC and counsel for Nossaman regarding FRAP 28j letters re: Purdue Pharma decision and order or oral arguments for related appeals	Fates, Edward (Ted)	1.30	1,047.15	785,908.80	WO	HD	TR	_____
07/24/24	9705649	Analyze CTC letter to Ninth Circuit clerk regarding motion to strike portions of Peterson brief	Fates, Edward (Ted)	0.20	161.10	786,069.90	WO	HD	TR	_____
07/25/24	9707391	Analyze order partially granting CTC motion to strike and / file a sur-reply (.1) communications with counsel for CTC re: same and argument time allocation (.2)	Fates, Edward (Ted)	0.30	241.65	786,311.55	WO	HD	TR	_____
07/26/24	9707937	Communications with counsel for CTC regarding arguments, sur-reply brief, and allocation of oral argument time (.5) analyze FRAP 28j letters from Peterson (.8) communications with CTC counsel re: same (.2) advise Receiver re: same (.3)	Fates, Edward (Ted)	1.80	1,449.90	787,761.45	WO	HD	TR	_____

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Fees for Matter 378827.00013.(Chicago Title Litigation)

Trans Date	Index	Description of Service Rendered	Timekeeper	Hours	Fees	Sum	Circle Action			
07/31/24	9714778	Analyze CTC draft letter to Ninth Circuit clerk re: recent authorities and discuss same with Receiver	Fates, Edward (Ted)	0.80	644.40	788,405.85	WO	HD	TR	_____
08/01/24	9717174	Communications with Receiver and counsel for CTC re: FRAP 28j letter and oral argument (.7) work on revisions to same (.4)	Fates, Edward (Ted)	1.10	886.05	789,291.90	WO	HD	TR	_____
08/02/24	9719545	Analyze CTC sur-reply in Peterson appeal of settlement bar order	Fates, Edward (Ted)	0.50	402.75	789,694.65	WO	HD	TR	_____
08/05/24	9720852	Communications with counsel for CTC and counsel for Nossaman re: oral argument time allocations, sequence of arguments, communications with court clerk re: same, etc.	Fates, Edward (Ted)	0.60	483.30	790,177.95	WO	HD	TR	_____
08/06/24	9722818	Call/emails with counsel for CTC re: oral argument issues for 8/13	Fates, Edward (Ted)	0.90	724.95	790,902.90	WO	HD	TR	_____
08/07/24	9723518	Call with counsel for Nossaman and counsel for CTC regarding oral argument in appeals on 8/13	Fates, Edward (Ted)	0.90	724.95	791,627.85	WO	HD	TR	_____
08/08/24	9724874	Analyze briefs, legal issues, and cases cited by Ovation, Nossaman, CTC and Peterson in preparation for 8/13 oral arguments in appeals of settlement bar orders	Fates, Edward (Ted)	3.60	2,899.80	794,527.65	WO	HD	TR	_____
09/19/24	9774433	Analyze status of Chicago Title state court actions in preparation for 9/20 status conference	Fates, Edward (Ted)	0.20	161.10	794,688.75	WO	HD	TR	_____

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Fees for Matter 378827.00013.(Chicago Title Litigation)

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09/20/24	9775404	Attend status conference in state court for Chicago Title cases (.6) communications with counsel for CTC and counsel for Nossaman re: same (.2)	Fates, Edward (Ted)	0.80	644.40	795,333.15	WO	HD	TR	_____
02/20/25	9958312	Analyze Ninth Circuit decision affirming Chicago Title and Nossaman bar orders and advise Receiver re: same	Fates, Edward (Ted)	0.80	644.40	795,977.55	WO	HD	TR	_____
02/21/25	9959845	Analyze request from counsel for Peterson regarding extension of time to file petition for rehearing in Ninth Circuit (.2) advise Receiver re: same (.2) communications with SEC counsel re: same (.1) communications with counsel for Peterson re same (.1)	Fates, Edward (Ted)	0.60	483.30	796,460.85	WO	HD	TR	_____
02/24/25	9962236	Analyze corrected opinion from Ninth Circuit fixing typo (.1) analyze motion by Peterson for extension of time to file petition for rehearing on appeal of Chicago Title and Nossaman settlement bar orders (.2)	Fates, Edward (Ted)	0.30	241.65	796,702.50	WO	HD	TR	_____
02/26/25	9965646	Analyze order extending deadline to file petition for rehearing and advise Receiver re: same	Fates, Edward (Ted)	0.10	80.55	796,783.05	WO	HD	TR	_____
03/21/25	9995060	Attend status conference in Chicago Title cases in state court	Fates, Edward (Ted)	0.80	644.40	797,427.45	WO	HD	TR	_____
04/11/25	10023544	Analyze Peterson petition for rehearing for Ninth Circuit decision affirming CTC settlement bar order (.8) advise Receiver re: same (.1)	Fates, Edward (Ted)	0.90	724.95	798,152.40	WO	HD	TR	_____

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Trans Date	Index	Description of Service Rendered	Timekeeper	Hours	Fees	Sum	Circle	Action		
05/07/25	10058723	Analyze order denying Peterson petition for rehearing on appeal of settlement bar order and advise Receiver re: same	Fates, Edward (Ted)	0.20	161.10	798,313.50	WO	HD	TR	_____
05/13/25	10065944	Analyze Peterson motion for stay of Ninth Circuit mandate to seek Supreme Court cert (.2) advise Receiver re: same (.1) communications with appellate counsel for CTC re: same (.4)	Fates, Edward (Ted)	0.70	563.85	798,877.35	WO	HD	TR	_____
05/16/25	10071288	Analyze draft brief from counsel for CTC opposing Peterson motion to Ninth Circuit seeking stay of mandate (.5) discuss same with Receiver (.2) communications with counsel for CTC re: revised draft brief (.2)	Fates, Edward (Ted)	0.90	724.95	799,602.30	WO	HD	TR	_____
05/19/25	10072452	Discuss draft brief with Receiver (.1) communications with counsel for CTC re: joining in draft brief and revisions to same (.4)	Fates, Edward (Ted)	0.50	402.75	800,005.05	WO	HD	TR	_____
05/20/25	10074617	Analyze Ovation petition for certiorari for appeal of Nossaman bar order (.6) advise Receiver re: same (.3) communications with counsel for CTC re: same (.4)	Fates, Edward (Ted)	1.30	1,047.15	801,052.20	WO	HD	TR	_____
05/22/25	10077562	Communications with counsel for CTC re: Ovation petition for certiorari (.2) discuss same with Receiver (.2) advise Receiver re: media inquiry relating to petition for certiorari (.1)	Fates, Edward (Ted)	0.50	402.75	801,454.95	WO	HD	TR	_____
05/22/25	10081095	Review Ovation's petition for certiorari regarding bar order	Pham, Matt D.	0.30	194.40	801,649.35	WO	HD	TR	_____

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Fees for Matter 378827.00013.(Chicago Title Litigation)

Trans Date	Index	Description of Service Rendered	Timekeeper	Hours	Fees	Sum	Circle	Action		
05/28/25	10084529	Review order staying Ninth Circuit mandate and advise Receiver re: same (.1) communications with counsel for SEC re: same (.1)	Fates, Edward (Ted)	0.20	161.10	801,810.45	WO	HD	TR	_____
06/04/25	10095656	Communications with appellate counsel for CTC regarding Ovation petition for certiorari	Fates, Edward (Ted)	0.20	161.10	801,971.55	WO	HD	TR	_____
06/09/25	10100511	Review correspondence from US Supreme Court regarding deadline for opposing Ovation petition for certiorari	Fates, Edward (Ted)	0.10	80.55	802,052.10	WO	HD	TR	_____
06/27/25	10126938	Communications with counsel for CTC regarding issues relating to Ovation petition for certiorari and response to same	Fates, Edward (Ted)	0.20	161.10	802,213.20	WO	HD	TR	_____
07/01/25	10158957	Communications with counsel for CTC and AUSA regarding DOJ request for extension of time to respond to Ovation petition for certiorari	Fates, Edward (Ted)	0.60	526.50	802,739.70	WO	HD	TR	_____
07/08/25	10139382	Communications with AUSA regarding DOJ request for extension relating to Ovation petition for certiorari (.2) communications with counsel for CTC re: same (.2)	Fates, Edward (Ted)	0.40	351.00	803,090.70	WO	HD	TR	_____
07/09/25	10170997	Communications with AUSA and counsel for Chicago Title regarding issues relating to Ovation petition for cert.	Fates, Edward (Ted)	0.50	438.75	803,529.45	WO	HD	TR	_____
07/23/25	10158668	Analyze brief filed in connection with Ovation petition for cert. by SEC (.6)	Fates, Edward (Ted)	1.10	965.25	804,494.70	WO	HD	TR	_____

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		communications with counsel for CTC re: same (.2) advise Receiver re: same (.3)								
07/28/25	10170880	Analyze and comment on outline for potential brief in opposition to Ovation petition from counsel for CTC (.8) discuss same with counsel for CTC (.4)	Fates, Edward (Ted)	1.20	1,053.00	805,547.70	WO	HD	TR	_____
08/05/25	10181567	Analyze Peterson petition for certiorari to US Supreme Court regarding order affirming Chicago Title bar order (1.6) advise Receiver re: same (.2)	Fates, Edward (Ted)	1.80	1,579.50	807,127.20	WO	HD	TR	_____
08/06/25	10181566	Communications with counsel for Chicago Title regarding Peterson petition for cert. and potential response to same	Fates, Edward (Ted)	0.40	351.00	807,478.20	WO	HD	TR	_____
08/08/25	10190139	Communications with counsel for CTC regarding Peterson petition for certiorari and potential response to same	Fates, Edward (Ted)	0.60	526.50	808,004.70	WO	HD	TR	_____
09/08/25	10219316	Analyze brief filed by SEC in response to Peterson petition for certiorari (.4) advise Receiver re: same (.2)	Fates, Edward (Ted)	0.60	526.50	808,531.20	WO	HD	TR	_____
10/02/25	10253011	Analyze Supreme Court docket entries requesting response to Peterson and Ovation petitions for cert. (.2) communications with counsel for Chicago Title re: same (.3) advise Receiver re: same (.2)	Fates, Edward (Ted)	0.70	614.25	809,145.45	WO	HD	TR	_____
10/07/25	10258069	Analyze letters from clerk of Supreme Court requesting responses to Peterson and Ovation petitions for cert.	Fates, Edward (Ted)	0.20	175.50	809,320.95	WO	HD	TR	_____

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10/08/25	10259040	Communications with counsel for CTC regarding responses to Ovation and Peterson petitions for cert and anticipated timeline for same	Fates, Edward (Ted)	0.40	351.00	809,671.95	WO	HD	TR	_____
10/21/25	10275419	Analyze CTC requests for extension of time to file responsive brief to Ovation and Peterson petitions for cert.	Fates, Edward (Ted)	0.20	175.50	809,847.45	WO	HD	TR	_____
10/31/25	10287828	Communications with counsel for CTC regarding opposition to Ovation petition for cert., potential Receiver brief joining same, and related issues	Fates, Edward (Ted)	0.80	702.00	810,549.45	WO	HD	TR	_____
11/03/25	10291124	Work on Supreme Court bar application as necessary to file responsive briefs per Supreme Court requests (.2) communications with counsel for CTC re: same (.1) analyze draft brief in response to Ovation petition for cert. (1.4)	Fates, Edward (Ted)	1.70	1,491.75	812,041.20	WO	HD	TR	_____
11/04/25	10299656	Advise on comments to CTC brief opposing Ovation petition for cert (.3) communications with counsel for CTC (.2)	Fates, Edward (Ted)	0.50	438.75	812,479.95	WO	HD	TR	_____
11/04/25	10304060	Review and analyze Chicago Title's draft brief in opposition to Ovation's petition for certiorari (1.2); Confer with Ted Fates regarding changes to Chicago Title's brief (0.1); Make proposed revisions to Chicago Title's draft brief in opposition to Ovation's petition for certiorari (0.7)	Pham, Matt D.	2.00	1,377.00	813,856.95	WO	HD	TR	_____

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11/05/25	10297099	Discuss CTC draft opposition to Ovation petition for cert with Receiver (.3) communications with counsel for CTC re: same (.3)	Fates, Edward (Ted)	0.60	526.50	814,383.45	WO	HD	TR	_____
11/11/25	10305336	Communications with counsel for CTC re: briefs in opposition to Ovation and Peterson petitions for cert and Receiver's joinder to same	Fates, Edward (Ted)	0.90	789.75	815,173.20	WO	HD	TR	_____
11/12/25	10306515	Initial work on brief in opposition to Ovation and Peterson petitions for cert.	Fates, Edward (Ted)	0.40	351.00	815,524.20	WO	HD	TR	_____
11/17/25	10311848	Work on brief in opposition to Ovation petition for cert.	Fates, Edward (Ted)	2.90	2,544.75	818,068.95	WO	HD	TR	_____
11/17/25	10330166	Research regarding Supreme Court brief and emails with T. Fates re same.	Gonzales, Rachael	1.50	803.25	818,872.20	WO	HD	TR	_____
11/18/25	10314333	Revisions to brief in opposition to Ovation petition for cert (.7) communications with counsel for CTC re: same (.4)	Fates, Edward (Ted)	1.10	965.25	819,837.45	WO	HD	TR	_____
11/21/25	10318543	Communications with counsel for CTC re: briefs in opposition to Ovation and Peterson petitions for cert. (.4) work on brief in opposition (.5) discuss same with Receiver (.3)	Fates, Edward (Ted)	1.20	1,053.00	820,890.45	WO	HD	TR	_____
11/24/25	10320575	Communications with counsel for CTC and printing company for US Supreme Court filings (.3) analyze CTC draft brief in opposition to Peterson petition for cert. (1.2) work on Receiver's brief in opposition (.4)	Fates, Edward (Ted)	1.90	1,667.25	822,557.70	WO	HD	TR	_____

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Trans Date	Index	Description of Service Rendered	Timekeeper	Hours	Fees	Sum	Circle	Action		
11/26/25	10325085	Respond to inquiry from counsel for Chicago Title re: Champion-Cain criminal case (.2) communications with Receiver re: draft briefs in opposition to pending Ovation and Peterson petitions for cert. (.4) communications with counsel for CTC re: same (.3)	Fates, Edward (Ted)	0.90	789.75	823,347.45	WO	HD	TR	_____
12/01/25	10329062	Work on finalizing briefs in opposition to Peterson and Ovation petitions for cert. (1.6) communications with printer re: filing and printing details for briefs (.3)	Fates, Edward (Ted)	1.90	1,667.25	825,014.70	WO	HD	TR	_____
12/01/25	10331410	Review and revise draft US Supreme Court Opposition to Petition for Cert and confer with T. Fates regarding same (0.7).	Del Castillo, Joshua	0.70	614.25	825,628.95	WO	HD	TR	_____
12/02/25	10332490	Final edits to brief in opposition to Peterson and Ovation petitions for cert. (.4) communications with printer re: same (.2)	Fates, Edward (Ted)	0.60	526.50	826,155.45	WO	HD	TR	_____
12/15/25	10347038	Communications with counsel for parties to Supreme Court appeals re: electronic service	Fates, Edward (Ted)	0.20	175.50	826,330.95	WO	HD	TR	_____
12/17/25	10351616	Analyze Ovation reply brief in support of petition for certiorari	Fates, Edward (Ted)	0.60	526.50	826,857.45	WO	HD	TR	_____
12/18/25	10353195	Analyze Peterson reply brief regarding US Supreme Court petition for certiorari	Fates, Edward (Ted)	0.60	526.50	827,383.95	WO	HD	TR	_____
12/23/25	10358767	Analyze Supreme Court notifications re: scheduling and advise Receiver re:	Fates, Edward (Ted)	0.20	175.50	827,559.45	WO	HD	TR	_____

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01/12/26	10377267	Review orders denying petitions for cert. filed by Peterson and Ovation and advise Receiver re: same (.2) review Ninth Circuit filings re: denial of petitions (.1) communications with counsel for CTC re: same (.1)	Fates, Edward (Ted)	0.40	351.00	827,910.45	WO	HD TR

Proforma Summary

Timekeeper

Number	Timekeeper	Hours	Rate	Amounts
000181	Hartney, Mark	269.20	837.00	225,320.40
000313	Zaro, David	188.50	837.00	157,774.50
000313	Zaro, David	75.30	895.50	67,431.15
000313	Zaro, David	3.20	967.50	3,096.00
000820	Kaup, John	64.80	315.00	20,412.00
000820	Kaup, John	1.40	337.50	472.50
001665	Fates, Edward (Ted)	277.40	643.50	178,506.90
001665	Fates, Edward (Ted)	94.40	688.50	64,994.40
001665	Fates, Edward (Ted)	53.50	742.50	39,723.75
001665	Fates, Edward (Ted)	25.80	805.50	20,781.90
001665	Fates, Edward (Ted)	26.10	877.50	22,902.75
001842	Del Castillo, Joshua	2.10	643.50	1,351.35
001842	Del Castillo, Joshua	0.70	877.50	614.25
002209	Griffin, Peter	0.80	513.00	410.40
002307	Peng, Simona	1.30	315.00	409.50
002343	Khalil, Suzanne	9.80	382.50	3,748.50
002510	Pham, Matt D.	40.40	414.00	16,725.60
002510	Pham, Matt D.	0.30	648.00	194.40
002510	Pham, Matt D.	2.00	688.50	1,377.00
002592	Robichaud, James	2.10	409.50	859.95
002744	Gonzales, Rachael	1.50	535.50	803.25
		1,140.60		\$827,910.45
Subtotal Fees				\$827,910.45

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Proforma Summary

Timekeeper

Number	Timekeeper	Hours	Rate	Amounts
	Discount			0.00
	Total Fees			827,910.45
	Total Disbursements			0.00

Attorney Billing Instructions

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

Billing Instructions

expires 6/30/2026: 10% off standard rates (automatic); no text editing; copies @ .10

Account Summary – As Of 03/02/26

	Fiscal YTD			Calendar YTD			LTD		
	Total	Fees	Disb.	Total	Fees	Disb.	Total	Fees	Disbursements
Worked	25,697.25	25,697.25	0.00	351.00	351.00	0.00	827,910.45	827,910.45	0.00
Unbilled Adj	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00
Billed	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00
Collected	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00
AR Write Off	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00
	Total	Fees	Costs						
WIP	827,910.45	827,910.45	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

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