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21 KRISTA L. FREITAG

22 UNITED STATES DISTRICT COURT
23 SOUTHERN DISTRICT OF CALIFORNIA

24 SECURITIES AND EXCHANGE
25 COMMISSION,

26 Plaintiff,

27 v.

28 GINA CHAMPION-CAIN and ANI
DEVELOPMENT, LLC,

Defendants,

AMERICAN NATIONAL
INVESTMENTS, INC.,

Relief Defendant.

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

**THIRD INTERIM FEE
APPLICATION OF ALLEN
MATKINS LECK GAMBLE
MALLORY & NATSIS LLP,
GENERAL COUNSEL TO THE
RECEIVER, KRISTA L. FREITAG,
FOR PAYMENT OF FEES AND
REIMBURSEMENT OF EXPENSES**

Date: February 16, 2021

Time: 11:15 a.m.

Courtroom: 14A

Judge: Hon. Larry A. Burns

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1 Allen Matkins Leck Gamble Mallory & Natsis LLP ("Allen Matkins"),
 2 general counsel to Krista L. Freitag (the "Receiver"), the Court-appointed receiver
 3 for ANI Development, LLC, American National Investments, Inc. ("ANI"), and
 4 their respective subsidiaries and affiliates (the "Receivership Entities"), hereby
 5 submits this Third Interim Application for Payment of Fees and Reimbursement of
 6 Expenses (the "Application"). This Application covers the period from April 1,
 7 2020 through June 30, 2020 (the "Application Period"), and seeks approval of
 8 \$503,335.80 in fees and \$9,128.50 in expenses, and an order authorizing the
 9 Receiver to pay, on an interim basis, 80% of the fees incurred (\$402,668.64) and
 10 100% of the expenses incurred (\$9,128.50).

11 **I. INTRODUCTION.**

12 This equity receivership involves a large, complex, and wide-ranging group
 13 of enterprises and assets associated with the alleged \$300 million fraudulent scheme
 14 that is the subject of the Complaint filed by the Securities and Exchange
 15 Commission (the "Commission"). The Receiver was appointed on
 16 September 3, 2019, pursuant to the Order; Granting The Parties' Joint Motion And
 17 Stipulated Request By All Parties For A Preliminary Injunction Order And Order (1)
 18 Freezing Assets; (2) Requiring Accountings; (3) Prohibiting Destruction Of
 19 Documents; And (4) Appointing A Permanent Receiver (the "Appointment Order")
 20 (Dkt. 6).

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

size and complexity of the receivership estate. Accordingly, the Receiver engaged Allen Matkins to assist with legal issues facing the receivership estate and the firm promptly began work, including assisting with the takeover of the enterprises and securing their assets.

This Application should be read in conjunction with the Receiver's Third Interim Report and Recommendations ("Fourth Report") filed on August 19, 2020 (Dkt. 430), which describes in detail the Receiver's activities during the Application Period.

This Application seeks approval of \$503,335.80 in fees for a total of 875.60 hours worked, and payment on an interim basis of 80% of that amount, or \$402,668.64. Allen Matkins has agreed to discount its standard hourly rates by 10% for this case. The work performed is described task-by-task in **Exhibit A**¹ and is broken down into the following categories:

Category	Hours	Amount
Asset Investigation & Recovery	238.40	\$136,185.75
Reporting	5.70	\$3,385.80
Operations & Asset Sales	185.10	\$90,726.75
Claims & Distributions	91.90	\$59,022.00
Third Party Recoveries	349.00	\$210,690.45
Pending Litigation	5.50	\$3,325.05
Total Fees	875.60	\$503,335.80

The three largest categories of work – Asset Investigation & Recovery, Operations & Asset Sales and Third Party Recoveries – reflects the Receiver's continued focus on investigating, recovering, analyzing, and selling receivership

¹ While Allen Matkins has made efforts to ensure that its billing entries are consistent across categories, certain activities lend themselves to more than one category, or may be difficult to categorize. In any event, **Exhibit A** reflects the actual time spent by Allen Matkins personnel, and contains accurate descriptions of the services rendered.

1 assets through Court-approved sales of real and personal property. The firm has
 2 also assisted the Receiver in investigating and analyzing claims to recover sums
 3 from third parties and in obtaining documents from and producing documents to
 4 Chicago Title, investors/lenders, and other interested parties in an efficient manner.
 5 Throughout this period, Allen Matkins has worked with a myriad of third parties
 6 seeking receivership records. Through an on-going cooperative dialogue, Allen
 7 Matkins has avoided costly and time-consuming discovery disputes.

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

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

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

14 **1. Asset Investigation & Recovery.**

15 The substantial services in this category relate generally to efforts to identify,
 16 secure, preserve, investigate and recover receivership assets. The overriding goals
 17 of this work have been to identify and marshal receivership assets and investigate
 18 the foundation for claims in order to recover assets and pursue claims against third
 19 parties; all in an effort to maximize the distributions to victims of the scheme. The
 20 tasks performed include the following:

- 21 • Issuing subpoenas to financial institutions, lenders, recipients of
 22 potential receivership assets, and others involved with or otherwise
 23 connected to the Receivership Entities or receivership assets in some
 24 manner;
- 25 • Issuing demand and asset turnover letters to recipients believed to be in
 26 possession of receivership assets in order to enable the Receiver to
 27 recover and gain control over the assets;

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- 1 • Gathering, organizing, and reviewing documents and information
- 2 obtained from third parties;
- 3 • Negotiating and preparing a joint motion providing that documents
- 4 produced by Kim Peterson, Kim Funding and ABC Funding Strategies
- 5 pursuant to subpoenas issued by the Receiver would be covered by the
- 6 protective order applicable to the ANI document repository (discussed
- 7 below).
- 8 • Analyzing investor loans and associated documentation.

9 Allen Matkins also assisted the Receiver in establishing a centralized database
10 or "repository" of ANI documents and information that the Receiver has provided
11 (through a series of productions) to Chicago Title Company ("CTC"),
12 investors/lenders, and other third parties in lieu of responding to multiple subpoenas
13 and document requests in related litigation matters. The source files at issue include
14 hundreds of thousands of documents and electronic records stored at various
15 locations and servers, as well as documents produced to the Receiver by numerous
16 third parties pursuant to subpoenas issued by the Receiver. The firm advised the
17 Receiver and her staff on steps to gather the records and establish the repository
18 (including the appropriate scope of hard copy documents to be scanned) and the
19 options and strategies to reduce costs. Counsel also met and conferred with counsel
20 for CTC and counsel for various investor/lender groups to coordinate the production
21 of work and cost sharing terms. The Receiver filed a joint motion to approve the
22 proposed repository, allocation of costs, and protective order on June 9, 2020, which
23 was approved by the Court on June 26, 2020. Dkt. 326, 355.

24 Although significant time was spent to determine the appropriate scope and
25 cost-sharing for the ANI document repository, as well as to meet and confer with the
26 interested parties, in the long run this work will save the receivership estate
27 significant costs of having to respond to numerous individual document requests
28

1 involving hundreds of thousands of documents and electronic records in the various
2 litigation matters in state and federal court arising from the ANI Ponzi scheme.

3 Allen Matkins also assisted the Receiver in addressing the various issues
4 associated with the property owned by Defendant Gina Champion-Cain and her
5 husband Steven Cain located at 4014 Bandini Street, including secured debts on the
6 property and the receivership estate's claims to recover ANI funds used for the
7 down payment and to pay down prior loans on the property. These issues were
8 ultimately resolved via the Joint Motion filed on November 9, 2020 and order
9 approving it (Dkt. 499, 506.), pursuant to which, once the approved refinance of the
10 property closes, the receivership estate will recover \$1.3 million. The reasonable
11 and necessary fees for Allen Matkins' work in this category total \$136,185.75.

12 2. Reporting.

13 Allen Matkins' services in this category focused on preparing the Receiver's
14 Third Interim Report and Recommendations, which was filed on June 10, 2020,
15 2020. Dkt. 328. The 22-page report includes a detailed summary of the Receiver's
16 activities, funds recovered, real and personal property assets, restaurant and retail
17 operations, property taxes, insurance, debt service, loans and other investments,
18 investigation of third party claims, pending litigation, and other matters. The report
19 also details the receipts and disbursements for the receivership estate since the
20 Receiver's appointment and provides her recommendations for the continued
21 administration of the receivership. The reasonable and necessary fees for Allen
22 Matkins' work in this category total \$3,385.80.

23 3. Operations & Asset Sales.

24 Allen Matkins' significant work in this category reflects the volume and
25 complexity of legal issues that arose during the Application Period in connection
26 with the preservation, operation and sale of assets and the various businesses owned
27 and operated by the Receivership Entities, including but not limited to restaurants,
28

1 cafes, apartments, construction projects, leased properties, and other receivership
2 properties. In summary, work within this category included the following:

- 3 • Drafting, negotiating, and revising confidentiality agreements, purchase
4 and sale agreements, commercial and residential leases and lease
5 amendments, and restaurant management agreements, where necessary
6 and appropriate, for various receivership businesses and properties, as
7 well as handling related title, loan, and contract issues;
- 8 • Analyzing and assisting with restaurant closures, terminations of leases
9 for retail and restaurant spaces, surrender of possession, liquor license
10 issues, UCC lien issues, and removal of personal property and other
11 fixtures upon the termination of such leases;
- 12 • Attending to issues in connection with the maintenance of existing
13 trademarks, and abandonment of certain other unused trademarks,
14 relating to the Receivership Entities' various businesses;
- 15 • Addressing issues of employment law for the Receivership Entities,
16 including employee terminations, unpaid PTO, WARN Act issues,
17 health insurance and COBRA issues, and independent contractor
18 agreements in connection with businesses operations and the wind
19 down thereof;
- 20 • Analyzing and advising on insurance coverage issues;
- 21 • Advising and assisting with responses to media inquiries regarding the
22 receivership, restaurant operations, restaurant closures, and related
23 matters;
- 24 • Preparing amendments to the purchase and sale agreement and advising
25 on issues related to the closing of the Court-approved sale of ANI's
26 membership interest in the Pullman Lofts, which sale closed in
27 July 2020;
- 28

- 1 • Assisting with issues in connection with the termination of certain
- 2 service contracts associated with Receivership Entity operations;
- 3 • Assisting with closing documents for real property sales, and with
- 4 escrow agreements and related documents relating to sales of liquor
- 5 licenses associated with closed restaurants;
- 6 • Assisting with lease issues pertaining to certain tenants for residential
- 7 properties;
- 8 • Preparing motions, declarations, proposed orders, and notices regarding
- 9 non-receipt of overbids (as applicable) for Court approval of sales of
- 10 the following: the Crown Point property, Tennyson Street property,
- 11 3415 Mission Blvd. property, Surf Rider La Mesa property, and
- 12 737 Windemere Court property; and
- 13 • Advising on issues related to COVID-19 pandemic and Safer-At-Home
- 14 Orders, including required modifications to business operations and
- 15 notices to remaining ANI employees.

16 The reasonable and necessary fees for Allen Matkins' work in this category
 17 total \$90,726.75.

18 4. Claims & Distributions.

19 Services rendered in this category generally relate to the claims and interests
 20 of investors and creditors of the Receivership Entities. Allen Matkins assisted with
 21 issues related to disseminating information about the receivership to investors and
 22 creditors, including notification letters, and information provided on the receivership
 23 website (www.anireceivership.com). The firm also assisted in responding to
 24 numerous direct inquiries from investors and creditors and in preparing monthly
 25 case updates that are emailed to those who have subscribed to receive them through
 26 the receivership website.

27 Allen Matkins also assisted the Receiver in addressing issues relating to
 28 settlement of claims asserted by the SIP Investors against CTC. The firm analyzed

1 and advised the Receiver regarding (a) the settlement terms, (b) the respective
2 interests of the investors and the receivership estate, (c) the appropriate treatment of
3 the settling investors claims against the receivership estate, and (d) CTC's intention
4 to seek a good faith settlement determination. Allen Matkins participated in various
5 meet and confer discussions with counsel for CTC, counsel for the SIP Investors,
6 and counsel for the SEC regarding these issues. The firm also analyze the
7 settlement agreement and revised the associated joint motion concerning the
8 treatment of the settling investors' claims against the receivership estate. The joint
9 motion was filed on June 29, 2020, and approved on August 29, 2020. Dkt. 356,
10 443.

11 Allen Matkins assisted the Receiver in addressing the claims and mechanic's
12 liens asserted by the lender, the City of West Sacramento, the general contractor and
13 various subcontractors, respectively, associated with the partially constructed
14 apartment building located at 301 D Street in West Sacramento. The firm also
15 assisted in analyzing and addressing issues with various liens and claims asserted by
16 vendors, government agencies and former employees, including tax claims and
17 wage claims.

18 Having had sufficient time to assess the market for certain real properties in
19 relation to amounts owed on mortgages encumbering them, the Receiver determined
20 that it would be unlikely the receivership estate would be able to recover any value
21 from such properties. Accordingly, Allen Matkins assisted in negotiating and
22 preparing joint motions to allow the lenders with mortgages on the 4437 &
23 4445 Lamont Street, 3515 Hancock Street, and 7569-7571/7565 University Ave.
24 properties relief from the litigation stay to proceed with non-judicial foreclosures.

25 The reasonable and necessary fees for Allen Matkins' work in this category
26 total \$59,022.00.

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1 5. Third Party Recoveries.

2 This portion of the Application pertains to work on potential claims against
3 third parties to recover amounts for the benefit of the receivership estate. Due to the
4 confidential nature of the legal work on these matters and the Receiver's litigation
5 strategy vis-à-vis third parties, the Receiver has filed a motion concurrently herewith
6 to file this portion of the Application under seal.

7 It should be noted that although the total in this category is greater than in
8 Allen Matkins' prior two fee applications, the work during the second quarter was
9 more extensive than in the prior periods and involved several additional targets for
10 recovery. In addition to work relating to the Receiver's claims against CTC on
11 behalf of the Receivership Entities, including analysis of documents and causes of
12 action, the motion for authority to pursue claims against CTC, the draft complaint,
13 extensive meet and confers with interested non-parties, and objections to the
14 Receiver's motion, the work in this category also included: (a) work on claims
15 against other third parties,² including review of key documents, analysis of potential
16 claims, defenses and insurance coverage issues, and communications and
17 negotiations with counsel representing such third parties; (b) monitoring key
18 developments in the pending investor/lender actions against CTC and other parties
19 in state and federal court; and (c) consummation of the Court-approved settlement
20 with Daniel and Barbara Champion, which generated \$330,000 for the receivership
21 estate. The reasonable and necessary fees for Allen Matkins' work in this category
22 total \$210,690.45.

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27 ² These third parties include two law firms that represented one or more of the
28 Receivership Entities prior to the Receiver's appointment. The Receiver has recently reached an agreement on the material terms of a settlement with one such law firm and expects to submit the settlement to the Court for approval shortly.

1 6. Pending Litigation.

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

10 Allen Matkins assisted the Receiver in negotiating a contingent fee
 11 engagement with the law firm in Florida representing the plaintiffs. The firm also
 12 assisted in preparing a motion for Court approval of the engagement, which was
 13 approved by the Court on April 23, 2020. Dkt. 313.

14 Allen Matkins also assisted with issues relating to the action pending in San
 15 Diego Superior Court known as *Luu v. The Patio Restaurant Grp., LLC, et al.*, San
 16 Diego Super. Ct. Case No. 37-2019-00015451-CU-OE-CTL, which is a putative
 17 class action filed by a former employee (which action is now stayed pursuant to the
 18 litigation stay in the Appointment Order). The reasonable and necessary fees for
 19 Allen Matkins' work in this category total \$3,325.05.

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

21 Allen Matkins requests that the Court approve reimbursement of \$9,128.50 in
 22 out-of-pocket costs. The itemization of such expenses is summarized below by
 23 billing category. The majority of the expenses incurred relate to the electronic
 24 storage of documents and information for review and analysis purposes, as well as
 25 third-party asset investigations. The costs incurred by Allen Matkins during the
 26 Application Period are broken down by category as follows:

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Category	Total
Messenger/FedEx Fees	\$345.12
Service of Process	\$185.00
Duplication	\$6.30
PACER/Document Research	\$137.76
E-Discovery	\$5,414.32
Investigation	\$3,040.00
Total	\$9,128.50

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

1 the services to the estate." *In re Imperial 400 Nat'l, Inc.*, 432 F.2d 232, 237 (3d Cir.
 2 1970). Regardless of how this balancing test is formulated, no single factor is
 3 determinative and "a reasonable fee is based [upon] all circumstances surrounding
 4 the receivership." *SEC v. W.L. Moody & Co., Bankers (Unincorporated)*, 374 F.
 5 Supp. 465, 480 (S.D. Tex. 1974).

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

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

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
 25 8.0 hours of work (\$5,029.65 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 of \$503,335.80;
- 11 2. Authorizing and directing the Receiver to pay 80% of approved fees, or
 12 \$402,668.64, from the assets of the Receivership Entities;
- 13 3. Approving Allen Matkins' costs in the amount of \$9,128.50, and
 14 authorizing and directing the Receiver to reimburse such costs in full; and
- 15 4. For such other and further relief as the Court deems appropriate.

16
 17 Dated: January 13, 2021

ALLEN MATKINS LECK GAMBLE
 MALLORY & NATSIS LLP

18
 19 By: s/Edward G. Fates

20 DAVID R. ZARO
 EDWARD G. FATES
 21 NORMAN M. ASPIS
 Attorneys for Receiver
 KRISTA FREITAG
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EXHIBIT A

EXHIBIT A

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12/15/20 17:50:59 PROFORMA STATEMENT FOR MATTER 378827.00003 (Krista Freitag, as Receiver for ANI Deve) (SEC v. Champion-Cain - Asset Investigati)

Preliminary Billing Form

Billing Atty: 001665 - Fates, Edward
(Ted)

Matter #: 378827.00003

Client Name: Krista Freitag, as Receiver for ANI Deve

Date of Last Billing: 04/29/20

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

Proforma Number: 1066453

Client/Matter Joint Group # 378827-1

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

Trans Date	Index	Description of Service Rendered	Timekeeper	Hours	Fees	Sum	Circle	Action	
04/01/20	8051722	Advise on issues re: outstanding subpoena to R. Houts and enforcement of same	Fates, Edward (Ted)	0.20	118.80	118.80	WO	HD	TR
04/01/20	8055423	Analysis and determination of document productions in preparation for attorney review.	Peng, Simona	0.50	146.25	265.05	WO	HD	TR
04/01/20	8081981	Review and intake records from R. Houts and coordinate transmittal of the same to K. Freitag and L. Ryan (.3).	Aspis, Norman	0.30	121.50	386.55	WO	HD	TR
04/02/20	8053227	Communications with counsel for CTC re: narrowing/culling of ANI document for inclusion in proposed repository (.3) communications with former ANI in-house counsel re: subpoena received from CTC (.3) discuss analysis of Bandini-related transfers with Receiver (.2) communications with SEC counsel and counsel for First Choice Bank regarding same (.2)	Fates, Edward (Ted)	1.00	594.00	980.55	WO	HD	TR
04/02/20	8055403	Email/call related to the D Street Development Project, follow-up with	Zaro, David	0.20	157.50	1,138.05	WO	HD	TR

12/15/20 17:50:59 PROFORMA STATEMENT FOR MATTER 378827.00003 (Krista Freitag, as Receiver for ANI Deve) (SEC v. Champion-Cain - Asset Investigati)

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

Trans Date	Index	Description of Service Rendered Receiver regarding same (.2).	Timekeeper	Hours	Fees	Sum	Circle	Action	
04/02/20	8055424	Analysis and determination of document productions in preparation for attorney review.	Peng, Simona	0.30	87.75	1,225.80	WO	HD	TR _____
04/02/20	8081898	Review, finalize, and transmit draft protective order (.4); confer with Union Bank representative regarding production of records and review invoice regarding the same (.3); confer with counsel regarding issues in connection with R. Houts' production (.4); review correspondence from L. Ryan regarding subpoena to JP Morgan Chase and commence preparing the same (.2).	Aspis, Norman	1.30	526.50	1,752.30	WO	HD	TR _____
04/02/20	8082554	Initial review and analysis of correspondence and attached custodian list from CTC (.4); analysis and exchange of e-mails re: scope of same and effect on repository issues (.3); analysis and review of e-mails re: joint motion issues and filing (.2).	Farrell, Michael	0.90	643.95	2,396.25	WO	HD	TR _____
04/03/20	8055359	Analyze issues re: subpoena issued to W. Adams by CTC and attorney-client privilege (.3) communications with counsel for Champion-Cain and counsel for W. Adams re: same (.6) communications with SEC counsel and S. Cain counsel re: analysis of Bandini-related transfers (.2)	Fates, Edward (Ted)	1.10	653.40	3,049.65	WO	HD	TR _____
04/03/20	8082303	Review, analysis and exchange of various e-mails and review of other materials re: CTC custodian list and data encompassed	Farrell, Michael	0.70	500.85	3,550.50	WO	HD	TR _____

12/15/20 17:50:59 PROFORMA STATEMENT FOR MATTER 378827.00003 (Krista Freitag, as Receiver for ANI Deve) (SEC v. Champion-Cain - Asset Investigati)

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

Trans Date	Index	Description of Service Rendered	Timekeeper	Hours	Fees	Sum	Circle Action			
		by same (.5); analysis and exchange of e-mails re: ANI e-mail policies and effect of same on former employee data (.2).								
04/06/20	8056409	Communications with Receiver and G. Rodriguez re: ANI data/custodians and hard copy inventory for document repository (.4) communications with Receiver and counsel for G. Champion-Cain re: location of leased copier (.3)	Fates, Edward (Ted)	0.70	415.80	3,966.30	WO	HD	TR	_____
04/06/20	8056568	Analysis and determination of document productions in preparation for attorney review.	Peng, Simona	0.80	234.00	4,200.30	WO	HD	TR	_____
04/06/20	8060658	Prepare and revise supplemental subpoena to JP Morgan Chase (.5); confer with Union Bank representative, and attention to production-related issues (.4).	Aspis, Norman	0.90	364.50	4,564.80	WO	HD	TR	_____
04/06/20	8082200	Analysis and review of e-mails and documents re: repository issues.	Farrell, Michael	0.40	286.20	4,851.00	WO	HD	TR	_____
04/07/20	8057290	Communications with SEC counsel re: revisions to proposed protective order concerning documents produced by CTC in response to subpoena (.3) communications with SEC counsel re: data for ANI document repository (.1) discuss document repository plan with counsel for Allred plaintiffs (.2)	Fates, Edward (Ted)	0.60	356.40	5,207.40	WO	HD	TR	_____
04/07/20	8060635	Attention to issues in connection with subpoena to American Express, including conferring with American Express representative regarding additional	Aspis, Norman	0.70	283.50	5,490.90	WO	HD	TR	_____

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		information required and extension of deadline to respond, and conferring with L. Ryan regarding additional information (.4); attention to finalizing protective order to govern responsive records produced by Chicago Title (.3).							
04/07/20	8082081	Analysis and review of e-mails re: finalizing protective order terms for joint motion (.2); review, analysis and exchange of various e-mails re: custodian data and repository issues and timing (.4).	Farrell, Michael	0.60	429.30	5,920.20	WO	HD	TR
04/08/20	8058318	Discuss issues re: forensic accounting with T. Hebrank	Fates, Edward (Ted)	0.30	178.20	6,098.40	WO	HD	TR
04/08/20	8060604	Review production from Wells Fargo and manage intake of records (.2); confer with representative from American Express regarding production (.2).	Aspis, Norman	0.40	162.00	6,260.40	WO	HD	TR
04/08/20	8081881	Review and analysis of correspondence re: proposed joint motion to give investors access to subpoenaed documents (.2); drafted memorandum and exchanged e-mails re: same (.5).	Farrell, Michael	0.70	500.85	6,761.25	WO	HD	TR
04/09/20	8059557	Analyze and advise on issues re: R. Houts document production, redactions to same (.8) advise on issues re: protective order concerning CTC document production and joint motion re: same (.3) analyze issues re: data to be included in proposed ANI document repository (.4) communications with G. Rodriguez re: same (.1)	Fates, Edward (Ted)	1.60	950.40	7,711.65	WO	HD	TR

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04/09/20	8060589	Address the issues related to the production of records and negotiations with alleged class counsel/Chicago Title (.4). Call with counsel to address the discovery issues (.2).	Zaro, David	0.60	472.50	8,184.15	WO	HD	TR	_____
04/09/20	8081155	Attention to issues in connection with production from R. Houts (.3); review, finalize, and transmit for filing protective order (.7); review and transmit production from Wells Fargo in response to subpoena (.4).	Aspis, Norman	1.40	567.00	8,751.15	WO	HD	TR	_____
04/09/20	8081721	Review, analysis and exchange of e-mails re: assessing data volume for identified custodians (.3); analysis and review of e-mails re: filing of joint motion for protective order (.2); review and analysis of memorandum and attached charts re: data issues and exchanged e-mails re: same (.4); preparation for and participation in conference call re: data and repository issues (.7).	Farrell, Michael	1.60	1,144.80	9,895.95	WO	HD	TR	_____
04/10/20	8060475	Analyze information from Receiver re: Bandini-related transfers (.3) discuss same and strategy with Receiver (.4) call with SEC counsel re: same (.2) emails with counsel for First Choice, counsel for S. Cain, and counsel for G. Champion-Cain re: same (.2) discuss data analysis and hard copy document scanning issues with Receiver and G. Rodriguez (.5)	Fates, Edward (Ted)	1.40	831.60	10,727.55	WO	HD	TR	_____
04/10/20	8068563	Review order granting protective order, confer with counsel for Chicago Title	Aspis, Norman	0.30	121.50	10,849.05	WO	HD	TR	_____

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04/10/20	8081631	Preparation for and participation in conference call with client and others re: repository issues and strategy (.7); reviewed materials re: subpoenaed documents and e-mail accounts (.3); analysis re: scope and terms of protective order to govern access to and cost of repository (.3).	Farrell, Michael	1.30	930.15	11,779.20	WO	HD	TR	_____
04/13/20	8062181	Communications with counsel for S. Cain re: further discussion of issues relating to Bandini property (.3) advise on issues re: entry of protective order and CTC document production (.4)	Fates, Edward (Ted)	0.70	415.80	12,195.00	WO	HD	TR	_____
04/13/20	8063085	Review and transmit production from Chicago Title and confer with counsel regarding Union Bank checks (.6); review City National Bank records and Union Bank records and confer with counsel regarding the same (.6); revise and transmit subpoena to Chase (.3); prepare letters to American Express and transmit the same (1).	Aspis, Norman	2.50	1,012.50	13,207.50	WO	HD	TR	_____
04/13/20	8063578	Analysis of the interim protective order concerning the production of records to Chicago Title and follow-up on the production with counsel (.4). Call with counsel related to the Receiver's accounting, follow-up email/letter related to further discovery demand (.5).	Zaro, David	0.90	708.75	13,916.25	WO	HD	TR	_____

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04/13/20	8067474	Reviewed prior protective order re: destruction of documents (.3); review, analysis and exchange of e-mails re: potential issues arising from order and strategy to address same (.4); initial review and analysis of correspondence from S. Strauss and e-mails re: same (.3); analysis and review of correspondence re: costs of assessing data volumes for repository creation (.2); analysis and review of e-mails re: unredacted documents from CTC (.2).	Farrell, Michael	1.40	1,001.70	14,917.95	WO	HD	TR	_____
04/14/20	8063326	Revisions to supplemental bank subpoena (.1) call with Receiver, counsel for SEC, counsel for Champion-Cain, counsel for S. Cain re: issues relating to Bandini property (1.1) follow up discussion with Receiver re: same (.2)	Fates, Edward (Ted)	1.40	831.60	15,749.55	WO	HD	TR	_____
04/14/20	8067414	Outlined potential approaches to cost allocation for data repository (.5); analysis re: response to CTC demand for sworn testimony re: email accounts (.2);	Farrell, Michael	0.70	500.85	16,250.40	WO	HD	TR	_____
04/14/20	8068293	Finalize and serve supplemental subpoena to JP Morgan Chase (.5).	Aspis, Norman	0.50	202.50	16,452.90	WO	HD	TR	_____
04/15/20	8064708	Call with counsel for First Choice Bank re: issues relating to Bandini property (.5) discuss issues re: hard copy document scanning for document repository with Receiver (.4) communications with SEC counsel re: data for document repository (.2)	Fates, Edward (Ted)	1.10	653.40	17,106.30	WO	HD	TR	_____

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04/15/20	8067167	Review, analysis and exchange of e-mails re: development of custodian list for repository and strategy to advance the project (.4); analysis re: investor input and court approval issues and strategy (.3).	Farrell, Michael	0.70	500.85	17,607.15	WO	HD	TR
04/15/20	8067168	Review, analysis and exchange of e-mails re: development of custodian list for repository and strategy to advance the project (.4); analysis re: investor input and court approval issues and strategy (.3).	Farrell, Michael	0.70	500.85	18,108.00	WO	HD	TR
04/15/20	8067537	Analysis and determination of document productions in preparation for attorney review.	Peng, Simona	0.10	29.25	18,137.25	WO	HD	TR
04/16/20	8066148	Analyze issues re: narrowing of data for ANI document repostory, vendor pricing and cost allocation, and communications with counsel for investors re: same (1.3) communications with Receiver and G. Rodriguez re: same (.2) prepare detailed communication to counsel for investor groups re: repository and input re: narrowing of data (1.1)	Fates, Edward (Ted)	2.60	1,544.40	19,681.65	WO	HD	TR
04/16/20	8066832	Review, analysis and exchange of various e-mails re: data custodians and SEC input (.4); review and analysis of materials re: custodians, cost allocation and Chicago Title positions (.4); further review of S. Strauss correspondence and analysis re: response to same (.3); preparation for and participation in conference call re: data compilation , costs and strategy (1.3); review and analysis of draft memorandum	Farrell, Michael	3.60	2,575.80	22,257.45	WO	HD	TR

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		to investor counsel and exchanged e-mails re: same (.2); reviewed summary of cost allocation law and exchanged e-mails re: same (.4); drafted correspondence to M. Donohue and exchanged e-mails re: same (.3); analysis and review of correspondence re: attorney-client privilege issues and strategy to address same re: data repository (.3).							
04/16/20	8068453	Confer with counsel regarding cost allocation of discovery under federal law (.2); confer with counsel and leave voicemail for S. Metzger regarding R. Houts' production of documents (.2).	Aspis, Norman	0.40	162.00	22,419.45	WO	HD	TR
04/17/20	8068395	Communications with counsel for Allred investors re: input on narrowing of data for ANI document repository (.4) discuss additional email account relating to W. Adams with Receiver (.3) communications with counsel for Champion-Cain re: same (.2)	Fates, Edward (Ted)	0.90	534.60	22,954.05	WO	HD	TR
04/17/20	8070101	Review, analysis and exchange of e-mails re: repository and deleted e-mails issues and strategy to address same (.3); reviewed materials re: potential repository cost allocation models and analysis re: applicability to present matter (.5); reviewed correspondence from CTC counsel and exchanged e-mails re: same (.3)	Farrell, Michael	1.10	787.05	23,741.10	WO	HD	TR
04/20/20	8068557	Communication with Receiver and counsel for Champion-Cain re: additional email accounts (.4) revisions to response to	Fates, Edward (Ted)	1.10	653.40	24,394.50	WO	HD	TR

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		counsel for CTC re: request for discovery concerning deleted email accounts (.4) discuss same with Receiver (.3)							
04/20/20	8069281	Drafted response to CTC correspondence, including review and analysis of various materials (.9); telephone conference, analysis and exchange of e-mails re: revisions to draft response and strategy for same (.4); review and analysis of research and documents re: deleted e-mails (.6); analysis and review of e-mails with defense counsel re: deleted e-mails (.2); analysis and exchange of e-mails with counsel re: conference call (.2).	Farrell, Michael	2.30	1,645.65	26,040.15	WO	HD	TR
04/20/20	8080516	Extensively review case law regarding cost-sharing and cost allocation issues within the context of multi-party discovery and litigation for purposes of online repository (1.7).	Aspis, Norman	1.70	688.50	26,728.65	WO	HD	TR
04/21/20	8069912	Analyze issues regarding deleted email accounts and discuss response to CTC regarding same with Receiver	Fates, Edward (Ted)	0.50	297.00	27,025.65	WO	HD	TR
04/21/20	8080339	Attention to issues in connection with R. Houts' production (.2).	Aspis, Norman	0.20	81.00	27,106.65	WO	HD	TR
04/21/20	8080507	Analyze case law regarding cost-sharing in multi-party discovery context (.8).	Aspis, Norman	0.80	324.00	27,430.65	WO	HD	TR
04/21/20	8081001	Review, analysis and exchange of various e-mails re: response to CTC's request for declaration and revisions to same (.5); finalized and distributed response to CTC	Farrell, Michael	1.40	1,001.70	28,432.35	WO	HD	TR

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		(.2); review and analysis of e-mail and attached document from investor counsel re: custodians for repository searches and analysis re: response to same (.3); analysis and review of materials re: repository cost and production issues (.4).								
04/22/20	8071058	Communications with counsel for investors re: data for ANI document repository (.2) analyze investor requests for additional ANI custodian data and next steps (.3) discuss same with Receiver and G. Rodriguez (.4) advise on issues re: R. Houts privilege log and communications with counsel for R. Houts re: same (.3) advise Receiver re: hard copy document scanning and terms of vendor contract re: same (.6) revisions to contract (.3)	Fates, Edward (Ted)	2.10	1,247.40	29,679.75	WO	HD	TR	_____
04/22/20	8072768	Call/emails related to the discovery issues (.3). Review of proposed approach to the discovery costs/cost sharing and coordination with counsel (.4).	Zaro, David	0.70	551.25	30,231.00	WO	HD	TR	_____
04/22/20	8073082	Analysis and exchange of various e-mails re: data repository, data custodians, costs and timing issues (.7); telephone conference, analysis and exchange of e-mails re: CTC request for written summary of deleted e-mails background and response to same (.6); outlined issues and points for call with CTC counsel (.2); analysis and review of e-mails re: scanning of hard copy documents and cost/strategy re: same (.2).	Farrell, Michael	1.70	1,216.35	31,447.35	WO	HD	TR	_____

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04/22/20	8080309	Attention to issues in connection with R. Houts' production (.3).	Aspis, Norman	0.30	121.50	31,568.85	WO	HD	TR	_____
04/23/20	8072940	Analyze electronic data and vendor pricing issues (.3) call with SEC counsel and counsel for CTC re: work to establish document repository, vendor pricing, cost-sharing issues, and information re: deleted emails (.8)	Fates, Edward (Ted)	1.10	653.40	32,222.25	WO	HD	TR	_____
04/23/20	8075904	Research/analysis of the Personal Umbrella Liability Insurance policy as to Gina/Steve Champion-Cain, draft memorandum to Receiver related to coverage (.9).	Zaro, David	0.90	708.75	32,931.00	WO	HD	TR	_____
04/23/20	8078191	Review, analyze, and summarize asset search results for J. Stalling.	Elder, Stephanie	1.90	897.75	33,828.75	WO	HD	TR	_____
04/23/20	8078690	Review case law regarding cost allocation issues in connection with multi-party discovery and draft email to M. Farrell regarding the same (.5).	Aspis, Norman	0.50	202.50	34,031.25	WO	HD	TR	_____
04/23/20	8078694	Draft email to S. Metzger regarding R. Houts' production (.1); intake production from Chicago Title (.2).	Aspis, Norman	0.30	121.50	34,152.75	WO	HD	TR	_____
04/23/20	8080929	Review and analysis of memorandum re: repository costs and exchanged various e-mails re: additional information needed for same (.7); review, analysis and exchange of e-mails and review of case law re: authorities addressing cost allocations in multi-party litigation (.8); telephone conference and analysis re: issues and positions for conference call (.3);	Farrell, Michael	2.50	1,788.75	35,941.50	WO	HD	TR	_____

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		preparation for and participation in conference call with SEC and CTC re: repository and receiver declaration issues (.7).							
04/24/20	8073784	Discuss ANI custodians for potential inclusion in data repository with Receiver (.4) call/emails with counsel for Allred plaintiffs re: same (.4) analyze issues raised by counsel for Champion-Cain re: Bandini property, discuss same with Receiver (.2) discuss hard copy box count and scanning costs with Receiver (.2)	Fates, Edward (Ted)	1.20	712.80	36,654.30	WO	HD	TR
04/24/20	8075600	Attention to correspondence from American Express regarding subpoena (.2).	Aspis, Norman	0.20	81.00	36,735.30	WO	HD	TR
04/24/20	8075974	Review, analysis and exchange of numerous e-mails re: custodians, investor requests, repository strategy and related issues (.6); reviewed memorandum re: categories of cost and exchanged various e-mails re: same (.4); analysis and exchange of e-mails re: document scanning issues and strategy (.3); analysis and exchange of e-mails re: addressing subpoenaed documents (.3).	Farrell, Michael	1.60	1,144.80	37,880.10	WO	HD	TR
04/27/20	8081016	Review correspondence from American Express and review production from the same (.5); teleconference with S. Metzger regarding R. Houts' production (.2).	Aspis, Norman	0.70	283.50	38,163.60	WO	HD	TR
04/28/20	8076551	Address questions raised by counsel for investors re: proposed scope of ANI document repository (.6) analyze issues for	Fates, Edward (Ted)	1.40	831.60	38,995.20	WO	HD	TR

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		document repository, pricing, and cost-sharing (.4) communications with Receiver re: same (.2) communications with counsel for CTC re: document repository (.2)							
04/28/20	8077497	Analysis, review of materials and exchange of e-mails re: various repository issues and strategies.	Farrell, Michael	0.90	643.95	39,639.15	WO	HD	TR
04/28/20	8080984	Review privilege log and draft email to S. Metzger regarding questions/issues in connection with R. Houts' production (.9).	Aspis, Norman	0.90	364.50	40,003.65	WO	HD	TR
04/29/20	8078246	Call with counsel for CTC re: issues relating to document repository, pricing, cost allocation, and proposed joint motion from M. Kirby	Fates, Edward (Ted)	0.70	415.80	40,419.45	WO	HD	TR
04/29/20	8080116	Review of document productions and begin preparation of log.	Kaup, John	1.50	438.75	40,858.20	WO	HD	TR
04/29/20	8080305	Analysis and exchange of e-mails re: CTC inquiry on production of future subpoenaed documents and strategy to address same.	Farrell, Michael	0.40	286.20	41,144.40	WO	HD	TR
04/29/20	8080711	Draft letter to Futuristech Communications, Inc. and revise letter based on comments from counsel; sign and transmit letter via email and for FedEx (.8); review and transmit invoice from Wells Fargo for payment processing (.2); confer with JP Morgan representative regarding outstanding subpoena and provide additional information to comply with subpoena (.4).	Aspis, Norman	1.40	567.00	41,711.40	WO	HD	TR

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04/30/20	8080948	Communications with SEC counsel and counsel for First Choice Bank re: issues concerning Bandini property (.4) communicatons with Receiver and G. Rodriguez re: data totals and pricing for ANI document repository (.4)	Fates, Edward (Ted)	0.80	475.20	42,186.60	WO	HD	TR
04/30/20	8082798	Telephone conference, analysis and exchange of various e-mails re: finalizing estimate of repository costs and establishing proposed cost allocation.	Farrell, Michael	1.20	858.60	43,045.20	WO	HD	TR
04/30/20	8083190	Review of document productions and prepare log with details of each production.	Kaup, John	3.30	965.25	44,010.45	WO	HD	TR
05/01/20	8083922	Communications with SEC counsel and Receiver re: issues relating to Bandini property and potential resolution of same (.6) communications with G. Rodriguez re: information from forensic computer consultant re: data re: document repository (.2)	Fates, Edward (Ted)	0.80	475.20	44,485.65	WO	HD	TR
05/01/20	8106872	Draft revisions to Chicago Title Complaint (1.8). Research and analysis regarding vicarious liability in support of same (1.5).	Griffin, Peter	3.30	1,470.15	45,955.80	WO	HD	TR
05/01/20	8108618	Review, analysis and exchange of various e-mails re: repository cost issues.	Farrell, Michael	0.50	357.75	46,313.55	WO	HD	TR
05/04/20	8084585	Analyze issues re: document repository scope and pricing, cost-allocation proposal (.7) discuss same with Receiver (.3) communications with counsel for Champion-cain re: privilege review issues pertaining to document repository and	Fates, Edward (Ted)	1.80	1,069.20	47,382.75	WO	HD	TR

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		issues relating to life insurance policies and mortgage on Bandini property (.6) discuss same with Receiver (.2)							
05/04/20	8085681	Review and respond to emails regarding review and storage of production documents in online database.	Kaup, John	0.20	58.50	47,441.25	WO	HD	TR
05/04/20	8090226	Follow-up with S. Metzger regarding R. Houts' production of documents (.2).	Aspis, Norman	0.20	81.00	47,522.25	WO	HD	TR
05/04/20	8108444	Analysis, review of documents and exchange of numerous e-mails re: repository issues, including cost allocation, production strategy and timing issues.	Farrell, Michael	0.90	643.95	48,166.20	WO	HD	TR
05/05/20	8085844	Analyze pricing and cost-sharing issues, scope and provisions of proposed protective order (.6) work on draft meet and confer communication re: ANI document repository, privilege review, protective order, and cost-sharing (1.3) discuss privilege review issues with counsel for Champion-Cain (.2) communications with SEC counsel re: issues relating to Bandini property (.2) analyze response from counsel for R. Houts re: subpoena and privilege issues and advise on next steps re: same (.4) analyze issues regarding joint motion proposed by M. Kirby and CTC response to same (.4)	Fates, Edward (Ted)	3.10	1,841.40	50,007.60	WO	HD	TR
05/05/20	8086264	Analysis and determination of document productions in preparation for attorney review.	Peng, Simona	0.30	87.75	50,095.35	WO	HD	TR

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05/05/20	8086567	Review and respond to emails; review of document productions, update production log, and prepare estimate of total pages of documents produced.	Kaup, John	2.50	731.25	50,826.60	WO	HD	TR
05/05/20	8096156	Confer with counsel regarding protective order and motion to approve the same and allocation of repository costs (.6); review correspondence and updated document production from S. Metzger, on behalf of R. Houts (.3).	Aspis, Norman	0.90	364.50	51,191.10	WO	HD	TR
05/05/20	8108302	Telephone conference, analysis and exchange of various e-mails re: meet and confer on repository, calculation of costs, and timing of privilege review (.8); telephone conferences and analysis re: preparation of draft protective order and approval motion (.7); review and analysis of e-mail and attached motion re: CTC requirements for production of documents and exchanged e-mails re: same (.4).	Farrell, Michael	1.90	1,359.45	52,550.55	WO	HD	TR
05/06/20	8086577	Revisions to detailed meet and confer communication re: proposed ANI document repository, cost-sharing and protective order (.4) discuss same with Receiver (.2) call with counsel for SEC re: same (.2) calls with SEC counsel to discuss legal issues and approach to Bandini property (.8) discuss same with Receiver (.2) communications with counsel for First Choice Bank re: same (.1) communications with M. Kirby re: documents requested by investors and proposed document repository (.3) communications with counsel	Fates, Edward (Ted)	2.60	1,544.40	54,094.95	WO	HD	TR

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Trans Date	Index	Description of Service Rendered for CTC re: same (.4)	Timekeeper	Hours	Fees	Sum	Circle	Action	
05/06/20	8096023	Confer with counsel regarding draft protective order and motion to enter the same and approve cost allocation (.3).	Aspis, Norman	0.30	121.50	54,216.45	WO	HD	TR _____
05/06/20	8108179	Review and analysis of draft meet and confer correspondence re: repository and exchanged e-mails re: same (.4); telephone conference and analysis re: meet and confer and other repository issues (.6); analysis and exchange of e-mails re: discussions with CTC (.3).	Farrell, Michael	1.30	930.15	55,146.60	WO	HD	TR _____
05/07/20	8087950	Work on attachments to meet and confer communication concerning ANI document repository (.7) finalize meet and confer communication (.3) communications with SEC counsel and counsel for First Choice Bank (.2) call/emails with M. Kirby and W. Caldarelli re: protective order for ANI document repository (.7) advise on strategy and next steps re: R. Houts privilege claims in response to subpoena (.3) meet and confer re: ANI document repository and protective order with M. Kirby and W. Caldarelli (.5) communications with CTC counsel re: same (.2)	Fates, Edward (Ted)	2.90	1,722.60	56,869.20	WO	HD	TR _____
05/07/20	8093582	Prepare for and participate in teleconference with S. Metzger regarding R. Houts' subpoena response (.3); confer with counsel regarding the same (.2); analyze case law regarding privilege log requirements and attorney-client privilege disclosure issues (.6); draft email to S.	Aspis, Norman	1.50	607.50	57,476.70	WO	HD	TR _____

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Trans Date	Index	Description of Service Rendered Metzger regarding the same (.4).	Timekeeper	Hours	Fees	Sum	Circle	Action	
05/07/20	8093587	Prepare list of subpoenas served by Receiver and confer with counsel regarding the same (.6).	Aspis, Norman	0.60	243.00	57,719.70	WO	HD	TR
05/07/20	8294094	Telephone conference and analysis re: protective order strategy and terms (.3); review, analysis and exchange of e-mails re: subpoena/repository information (.4); review and analysis of memorandum to all counsel re: repository proposal, protective order and approval motion (.2); analysis re: cost allocation issues (.2).	Farrell, Michael	1.10	787.05	58,506.75	WO	HD	TR
05/08/20	8089032	Call with SEC counsel and counsel for First Choice Bank re: issues relating to Bandini property and First Choice loan secured by same	Fates, Edward (Ted)	0.50	297.00	58,803.75	WO	HD	TR
05/08/20	8091720	Review prior protective orders entered in action (.4); analyze case law regarding enforcing federal protective order in state court (.9); commence drafting protective order in connection with online repository (2.8).	Aspis, Norman	4.10	1,660.50	60,464.25	WO	HD	TR
05/08/20	8091920	Analysis of issues and strategy for recovery of the receivership interest in Bandini property/advice to counsel (.4).	Zaro, David	0.40	315.00	60,779.25	WO	HD	TR
05/08/20	8092572	Review correspondence from American Express regarding subpoena response (.2).	Aspis, Norman	0.20	81.00	60,860.25	WO	HD	TR
05/08/20	8107841	Review, analysis and exchange of e-mails re: Chicago Title position on subpoenas and	Farrell, Michael	0.60	429.30	61,289.55	WO	HD	TR

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		analysis re: same (.3); analysis and review of memorandum re: potential CTC settlements and receivership interests in same (.3).							
05/11/20	8090198	Communications with M. Kirby re: subpoenas issued to CTC (.2) analyze issues re: proposed protective order for ANI document repository (.5) revisions to same (.7) communications with SEC counsel, counsel for Champion-Cain, and counsel for S. Cain re: issues relating to Bandini property (.4) communications with counsel for Champion-Cain re: protective order and privilege review for repository (.4)	Fates, Edward (Ted)	2.20	1,306.80	62,596.35	WO	HD	TR
05/11/20	8092169	Call with counsel related to the document compilation and cooperation, database issues.	Zaro, David	0.40	315.00	62,911.35	WO	HD	TR
05/11/20	8092589	Continue drafting protective order to govern documents produced to the online repository and finalize the same, and confer with counsel regarding the same (2.3); analyze case law regarding enforcement of federal protective order in state court (1.1).	Aspis, Norman	3.40	1,377.00	64,288.35	WO	HD	TR
05/11/20	8092599	Review correspondence from Futuristech regarding the mechanic's lien and confer with counsel regarding the same (.2).	Aspis, Norman	0.20	81.00	64,369.35	WO	HD	TR
05/11/20	8106618	Review, analysis and exchange of e-mails re: preparation of draft protective order (.3); analysis and review of e-mails re: subpoena issues (.2); review and analysis of draft protective order (.6); telephone conferences	Farrell, Michael	3.70	2,647.35	67,016.70	WO	HD	TR

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		and analysis re: various issues raised by same (.5); review and analysis of authority re: court's ability to enjoin state court action (.7); review, analysis and revision of draft protective order and exchanged various e-mails with counsel and client re: same (1.2); reviewed e-mails with defense counsel re: privilege issues and analysis re: effect on repository timing (.2).								
05/12/20	8091724	Advise Receiver re: document scanning issues raised by vendor (.2) advise on next steps re: privilege claims asserted by R. Houts re: document production (.2) analyze issues raised by counsel for S. Cain re: Bandini property (.3)	Fates, Edward (Ted)	0.70	415.80	67,432.50	WO	HD	TR	_____
05/12/20	8102165	Review prior correspondence and draft email to S. Metzger regarding R. Houts' production (.2).	Aspis, Norman	0.20	81.00	67,513.50	WO	HD	TR	_____
05/12/20	8106512	Review and analysis of e-mails and other materials re: potential third party offsets and receiver's view of same (.5); review and analysis of prior pleadings re: offsets and exchanged e-mails re: treatment of attorneys' fees (.9); review, analysis and exchange of various e-mails re: draft protective order and CTC subpoenas (.5); analysis and review of e-mails re: privilege issues (.2).	Farrell, Michael	2.10	1,502.55	69,016.05	WO	HD	TR	_____
05/13/20	8102162	Confer with S. Metzger regarding R. Houts' production (.2).	Aspis, Norman	0.20	81.00	69,097.05	WO	HD	TR	_____

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05/13/20	8106478	Reviewed prior correspondence and orders re: potential issue with protective order.	Farrell, Michael	0.50	357.75	69,454.80	WO	HD	TR
05/14/20	8094078	Call with counsel for Allred plaintiffs re: proposed document repository (.2) call with counsel for K. Peterson re: documents requested (.2)	Fates, Edward (Ted)	0.40	237.60	69,692.40	WO	HD	TR
05/14/20	8106424	Analysis and review of materials re: potential judicial limitations on repository use and resolution of same.	Farrell, Michael	0.40	286.20	69,978.60	WO	HD	TR
05/15/20	8094589	Analyze issues re: feedback on repository and protective order from interested parties and next steps re: joint motion to approve same (.3) discuss same with Receiver (.2) discuss same with counsel for SEC (.1) calls with counsel for SEC, counsel for Champion-Cain, and counsel for S. Cain re: issues relating to Bandini property (.8)	Fates, Edward (Ted)	1.40	831.60	70,810.20	WO	HD	TR
05/15/20	8096183	Analyze case law regarding protective orders and cost allocation issues in anticipation of drafting motion to enter protective order and allocate costs in connection with the repository (2.2); draft motion regarding the same (5.9).	Aspis, Norman	8.10	3,280.50	74,090.70	WO	HD	TR
05/15/20	8106297	Review, analysis and exchange of e-mails re: protective order issues and resolution (.3); initial review and analysis of e-mail and attached redlined protective order (.4); review, analysis and exchange of e-mails re: preparation of motion re: repository (.2); analysis and review of e-mails re: hard copy imaging /coding issues (.2)	Farrell, Michael	1.10	787.05	74,877.75	WO	HD	TR

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05/18/20	8097288	Work on the draft of the Receiver's report (.7). Call related to the report and address accounting (.2).	Zaro, David	0.90	708.75	75,586.50	WO	HD	TR
05/18/20	8098343	Analyze issues with proposed changes to protective order for ANI document repository from CTC (.4) analyze further combined changes from CTC, W. Caldarelli, counsel for Allred investors, and counsel for K. Peterson (.8) advise on response to same (.3) call with Champion-Cain counsel re: issues relating to Bandini property (.3) advise on issues re: document subpoenas to be issued to K. Peterson and Kim Funding (.3)	Fates, Edward (Ted)	2.10	1,247.40	76,833.90	WO	HD	TR
05/18/20	8102075	Finalize motion to approve protective order and cost allocation and transmit the same (.6); confer with counsel regarding issues in connection with cost allocation (.3); run a comparison between two versions of draft protective order (.3); and review correspondence regarding potential subpoenas (.2).	Aspis, Norman	1.40	567.00	77,400.90	WO	HD	TR
05/18/20	8102078	Review correspondence regarding Dash Wagon and confer with Receiver regarding the same and CBB Venture, and commence letter to CBB Venture (.5); confer with S. Metzger regarding R. Houts' production (.2).	Aspis, Norman	0.70	283.50	77,684.40	WO	HD	TR
05/18/20	8106181	Review and analysis of e-mail and documents re: CTC proposed edits to protective order (.7); review and analysis of	Farrell, Michael	4.20	3,005.10	80,689.50	WO	HD	TR

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		edits proposed by investor counsel (.9); outlined issues raised by same and analysis re: receiver's positions (.8); telephone conference and analysis re: various protective order issues and strategy (.8); review, analysis and exchange of e-mails re: draft joint motion and potential allocation issues raised by same (.4); analysis re: joint motion arguments and strategy (.3); review and analysis of court's form protective order language (.3).							
05/19/20	8097275	Work on subpoenas to be issued to Kim Peterson, Kim Funding and ABC Funding Strategies (.6) analyze potential claims and discuss same with Receiver (.5)	Fates, Edward (Ted)	1.10	653.40	81,342.90	WO	HD	TR
05/19/20	8102031	Intake productions from American Express and JP Morgan Chase (.3); confer with counsel regarding forthcoming subpoenas (.2).	Aspis, Norman	0.50	202.50	81,545.40	WO	HD	TR
05/19/20	8105762	Review, analysis and revision of redlined version of protective order identifying changes acceptable to receiver and exchanged e-mails re: same (2.3); review and analysis of e-mails re: document scanning/coding issues and analysis re: potential issues raised by same (.3); initial review and analysis of draft joint motion and outlined potential issues to be addressed in same (1.3).	Farrell, Michael	3.90	2,790.45	84,335.85	WO	HD	TR
05/20/20	8098373	Analyze issues re: further comments to draft protective order for repository from M. Kirby (.2) communications with SEC	Fates, Edward (Ted)	1.50	891.00	85,226.85	WO	HD	TR

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		counsel and counsel for Champion-Cain re: protective order (.1) advise on issues re: document production and privilege claims asserted by R. Houts (.3) advise on issues re: joint motion to approve repository, cost allocation and protective order (.4) revisions to letter to CBB Ventures (.2) revisions to subpoenas to be issued to K. Peterson, K. Funding and ABC Funding Strategies (.3)							
05/20/20	8099596	Review correspondence from S. Metzger regarding R. Houts' production and confer with counsel regarding the same (.3); review, process, and transmit productions from American Express and JPMorgan Chase (.8); draft and transmit letter regarding CBB Venture Group, LLC and confer with counsel regarding the same (.9); draft subpoena to Kim Funding, LLC (.7); confer with C. Waidelich regarding Chicago Title production and download the same (.3); update, revise and transmit list of subpoenas and letters (.7).	Aspis, Norman	3.70	1,498.50	86,725.35	WO	HD	TR
05/20/20	8105759	Review and analysis of e-mail and attached document re: additional proposed revisions to protective order from investors (.7); analysis and exchange of e-mails re: proposed changes and strategy to address same (.5); review and analysis of correspondence re: investor/CTC settlement discussions and receiver positions on related issues (.3); review, analysis and revision of draft joint motion on repository (1.4); telephone conference and analysis re: strategy and approach for	Farrell, Michael	5.20	3,720.60	90,445.95	WO	HD	TR

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		motion (.5); further revision and analysis of draft motion (1.8).							
05/21/20	8099419	Communications with counsel for K. Peterson, Kim Funding and ABC Funding Strategies re: subpoenas to be issued and service of same	Fates, Edward (Ted)	0.20	118.80	90,564.75	WO	HD	TR _____
05/21/20	8100944	Revise and complete subpoenas to Kim Peterson, Kim Funding, and ABC Strategies, and serve the same (1.3); review joint motion to approve repository (.4).	Aspis, Norman	1.70	688.50	91,253.25	WO	HD	TR _____
05/21/20	8101355	Review draft subpoena/letter, call with counsel regarding third party subpoenas, advice as to scope (.3).	Zaro, David	0.30	236.25	91,489.50	WO	HD	TR _____
05/21/20	8105728	Completed review, analysis and revision of draft joint motion re: repository and exchanged e-mails re: same.	Farrell, Michael	1.80	1,287.90	92,777.40	WO	HD	TR _____
05/22/20	8100426	Revisions to joint motion re: approval of repository, cost allocation and protective order (.9) communications with Receiver and counsel for Chmapion-Cain re: issues relating to Bandini property (.3)	Fates, Edward (Ted)	1.20	712.80	93,490.20	WO	HD	TR _____
05/22/20	8102060	Teleconference with S. Hoslett regarding Chicago Title productions (.2).	Aspis, Norman	0.20	81.00	93,571.20	WO	HD	TR _____
05/22/20	8105685	Review and analysis of attorney edits to draft motion and exchanged e-mails re: same.	Farrell, Michael	0.60	429.30	94,000.50	WO	HD	TR _____

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05/26/20	8102680	Discuss scope of accounting and investor loss analysis with Receiver (.3) address inquiry from Caldarelli re: production of ANI emails (.2)	Fates, Edward (Ted)	0.50	297.00	94,297.50	WO	HD	TR
05/26/20	8106625	Review and revise repository motion (.4); draft K. Freitag declaration in support of repository motion (.7).	Aspis, Norman	1.10	445.50	94,743.00	WO	HD	TR
05/27/20	8104926	Communications with Receiver and counsel for Champion-Cain re: requested tax documents for Carmel and Thomas Ave. sales (.3) analyze and advise L. Ryan regarding Kyocera copier lease issues (.6)	Fates, Edward (Ted)	0.90	534.60	95,277.60	WO	HD	TR
05/27/20	8105426	Review and analysis of revised version of draft motion to approve ANI repository (.4); review, analysis and exchange of e-mails with counsel and receiver re: distribution and approval of same (.4).	Farrell, Michael	0.80	572.40	95,850.00	WO	HD	TR
05/28/20	8106809	Communications with counsel for Champion-Cain and counsel for S. Cain re: issues relating to Bandini property (.3) communications with SEC counsel re: same (.1)	Fates, Edward (Ted)	0.40	237.60	96,087.60	WO	HD	TR
05/28/20	8108710	Review list of entities produced by S. Metzger and analyze their relationship to the receivership; draft email regarding the same (.8).	Aspis, Norman	0.80	324.00	96,411.60	WO	HD	TR
05/29/20	8107834	Address issues/revisions to joint motion re: document repository and protective order re: same (.4) communications with Receiver and counsel (.3)	Fates, Edward (Ted)	0.70	415.80	96,827.40	WO	HD	TR

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05/29/20	8109150	Review and analysis of receiver's comments and edits to draft protective order and joint motion and exchanged various e-mails re: same (1.3); revised documents per receiver's comments (.7); analysis and exchange of e-mails with investor counsel re: status of protective order review (.3); analysis and exchange of e-mails re: additional revisions to joint motion (.5); drafted correspondence to all counsel re: receiver's documents and distributed same (.3).	Farrell, Michael	3.10	2,218.05	99,045.45	WO	HD	TR	_____
05/29/20	8109164	Review and revise repository motion (.6).	Aspis, Norman	0.60	243.00	99,288.45	WO	HD	TR	_____
06/02/20	8137166	Analysis and review of e-mails re: repository conference call issues (.3); reviewed materials re: filing and timing issues (.4).	Farrell, Michael	0.70	500.85	99,789.30	WO	HD	TR	_____
06/03/20	8112910	Calls with SEC counsel, CTC counsel and counsel for investor groups regarding repository protective order and joint motion (1.3) address issue re: Champion-Cain privilege review (.2)	Fates, Edward (Ted)	1.50	891.00	100,680.30	WO	HD	TR	_____
06/03/20	8137067	Review, analysis and exchange of various e-mails re: conference call issues (.3); preparation for and participation in conference call with counsel and analysis re: results of same (.7); review, analysis and exchange of various e-mails re: privilege document review and issues raised by same (.5); analysis and exchange	Farrell, Michael	3.50	2,504.25	103,184.55	WO	HD	TR	_____

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		of e-mails re: settlement issues (.2); telephone conference and analysis re: finalizing joint motion and protective order (.4); review and analysis of e-mail from M. Donohue re: proposed revision to document and exchanged e-mails re: same (.4) revised documents and drafted correspondence to all counsel re: approval of same (.8); reviewed local rule re: signature authority (.2).								
06/04/20	8113864	Analyze proposed changes to protective order for repository from counsel for Ovation and counsel for CTC and advise on issues re: same	Fates, Edward (Ted)	0.90	534.60	103,719.15	WO	HD	TR	_____
06/04/20	8114047	Analysis and determination of responsive documents in preparation for attorney review.	Peng, Simona	0.80	234.00	103,953.15	WO	HD	TR	_____
06/04/20	8114319	Attention to download and review of files from Chicago Title (.4); review response to subpoena from K. Peterson and related entities, and confer with counsel regarding the same (.3); correspond with S. Metzger regarding subpoena to R. Houts (.1); confer with counsel regarding subpoena to stamp company (.1).	Aspis, Norman	0.90	364.50	104,317.65	WO	HD	TR	_____
06/04/20	8117067	Work on issues concerning the discovery/document depository and protective order (.4). Call with counsel related to the documents and protective order/review issues, including attorney-client (.3).	Zaro, David	0.70	551.25	104,868.90	WO	HD	TR	_____

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06/04/20	8136948	Review and analysis of correspondence re: proposed revisions to protective order and analysis re: response to same (.5); reviewed draft order re: proposed revisions (.3); drafted response to counsel (.6); review, analysis and exchange of various e-mails re: privilege document review and handling of same (.6); telephone conference, analysis and exchange of various e-mails re: protective order and joint motion issues and strategy (.8); analysis and exchange of e-mails re: additional party to joint motion (.3); review and analysis of correspondence from M. Donohue re: repository issues and exchanged e-mails re: response to same (.4); revised documents and distributed to counsel (.4).	Farrell, Michael	3.90	2,790.45	107,659.35	WO	HD	TR	_____
06/05/20	8114874	Address further correspondence from counsel for Ovation re: protective order for ANI document repository	Fates, Edward (Ted)	0.40	237.60	107,896.95	WO	HD	TR	_____
06/05/20	8117889	Revise signatories to repository motion (.1).	Aspis, Norman	0.10	40.50	107,937.45	WO	HD	TR	_____
06/05/20	8136902	Review and analysis of correspondence from investor counsel re: protective order terms and analysis re: response to same (.4); analysis and review of draft order re: issues raised by counsel (.4); review, analysis and exchange of various e-mails re: response to counsel and strategy going forward (.5); analysis and exchange of e-mails re: revisions to joint motion (.3).	Farrell, Michael	1.60	1,144.80	109,082.25	WO	HD	TR	_____

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06/08/20	8116149	Analyze issues re: joint motion and protective order for repository (.5) revise Receiver declaration in support of joint motion (.2) final revisions to protective order (.2)	Fates, Edward (Ted)	0.90	534.60	109,616.85	WO	HD	TR	_____
06/08/20	8116628	Prepare for and participate in teleconference with S. Hoslett and L. Ryan regarding subpoena requests (.3); prepare subpoena to Form-Craft Business Systems (.4); transmit Chicago Title's final production (.2).	Aspis, Norman	0.90	364.50	109,981.35	WO	HD	TR	_____
06/08/20	8116633	Review and revise repository motion and K. Freitag declaration in support thereof (1.3); confer with counsel regarding approval process and commence preparing documents for filing (.4).	Aspis, Norman	1.70	688.50	110,669.85	WO	HD	TR	_____
06/08/20	8135545	Review and analysis of protective order re: open issues and exchanged e-mails re: same (.5); review, analysis and exchange of numerous e-mails with counsel re: comments on motion/protective order and authorization to sign motion (.8); reviewed proposed additional changes to documents (.3); revised documents and exchanged various e-mails re: edits and authorization issues (.6); analysis and exchange of e-mails re: filing issues (.3).	Farrell, Michael	2.50	1,788.75	112,458.60	WO	HD	TR	_____
06/09/20	8117331	Work on Receiver declaration in support of joint motion re: repository (.4) discuss same with Receiver (.2)	Fates, Edward (Ted)	0.60	356.40	112,815.00	WO	HD	TR	_____

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06/09/20	8117791	Confer with counsel regarding repository motion and supporting declaration of K. Freitag; revise the same (.4); prepare and finalize documents for filing with M. Diaz (.3).	Aspis, Norman	0.70	283.50	113,098.50	WO	HD	TR	
06/09/20	8117802	Confer with counsel regarding Form-Craft Business Systems, Inc. subpoena (.1).	Aspis, Norman	0.10	40.50	113,139.00	WO	HD	TR	
06/09/20	8135344	Review, analysis and exchange of numerous e-mails and review of documents re: joint motion and protective order issues and filing.	Farrell, Michael	1.10	787.05	113,926.05	WO	HD	TR	
06/09/20	8294216	Conference with counsel related to the discovery and document depository (.2).	Zaro, David	0.20	157.50	114,083.55	WO	HD	TR	
06/10/20	8119250	Call/emails with counsel for D. DuCharme re: ANI document repository and joint motion (.4) analyze and advise Receiver re: same (.2) communications with counsel for Champion-Cain re: Bandini issues (.2) advise Receiver re: same (.1) communications with counsel for Champion-Cain and Receiver re: investigation into bank account (.2)	Fates, Edward (Ted)	1.10	653.40	114,736.95	WO	HD	TR	
06/10/20	8135136	Review, analysis and exchange of e-mails re: privilege document issues and volume (.3); analysis re: timing of court approval and effect of hard copy scanning and privilege review on production strategy (.2); reviewed receiver's report and analysis re: effect on various open issues (.4).	Farrell, Michael	0.90	643.95	115,380.90	WO	HD	TR	

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

Trans Date	Index	Description of Service Rendered	Timekeeper	Hours	Fees	Sum	Circle	Action	
06/11/20	8119173	Communications with counsel for CTC re: request by counsel for D. DuCharme for access to repository documents (.3) advise Receiver re: same (.2) communications with counsel for D. DuCharme (.2)	Fates, Edward (Ted)	0.70	415.80	115,796.70	WO	HD	TR
06/11/20	8119364	Analysis and determination of privileged document in preparation for attorney review.	Peng, Simona	2.00	585.00	116,381.70	WO	HD	TR
06/11/20	8120057	Confer with S. Metzger regarding R. Houts' subpoena response (.1).	Aspis, Norman	0.10	40.50	116,422.20	WO	HD	TR
06/11/20	8135099	Telephone conferences, analysis and exchange of e-mails re: P. Swan e-mail and response to same (.6); reviewed protective order and joint motion re: same (.4); reviewed draft response and exchanged e-mails re: same (.2); drafted memorandum re: Swan issue to all parties and circulated same (.5); analysis and exchange of e-mails with counsel re: same (.3)	Farrell, Michael	2.00	1,431.00	117,853.20	WO	HD	TR
06/12/20	8119973	Analyze issues re: privilege review by counsel for Champion-Cain for ANI repository documents (.3) communications with counsel for K. Peterson re: document production, confidential information and protective order (.5)	Fates, Edward (Ted)	0.80	475.20	118,328.40	WO	HD	TR
06/12/20	8120182	Analysis and determination of privileged documents in preparation for attorney review.	Peng, Simona	0.50	146.25	118,474.65	WO	HD	TR
06/12/20	8121635	Address the issues, then attend conference with Receiver counsel concerning conflicts	Zaro, David	0.80	630.00	119,104.65	WO	HD	TR

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Trans Date	Index	Description of Service Rendered	Timekeeper	Hours	Fees	Sum	Circle	Action	
		dispute as to CTC/Cooley, Latham and assess overall approach to dispute among parties, investigation of Kim Funding.							
06/12/20	8125730	Finalize and transmit for service subpoena to Form-Craft Business Systems, Inc. (.5); confer with D. Kowalski regarding subpoenas to Peterson parties (.2).	Aspis, Norman	0.70	283.50	119,388.15	WO	HD	TR
06/12/20	8134973	Review and analysis of various e-mails from investor counsel re: proposed revision to protective order (.3); review, analysis and exchange of e-mails with A. Machala, counsel and others re: timing, volume of information and procedures for privilege review (.5).	Farrell, Michael	0.80	572.40	119,960.55	WO	HD	TR
06/15/20	8121224	Further communications with counsel for K. Peterson re: document production and protective order (.4) advise on subpoenas and document production issues re: Chicago Title and K. Peterson (.5)	Fates, Edward (Ted)	0.90	534.60	120,495.15	WO	HD	TR
06/15/20	8121424	Analysis and determination of privileged documents in preparation for attorney review.	Peng, Simona	0.20	58.50	120,553.65	WO	HD	TR
06/15/20	8122388	Confer with counsel and C. Waidelich regarding Chicago Title production (.7); confer with counsel regarding Peterson production (.2); confer with S. Hoslett regarding Chicago Title production (.2).	Aspis, Norman	1.10	445.50	120,999.15	WO	HD	TR
06/15/20	8134743	Analysis and review of materials re: privilege, repository and production issues.	Farrell, Michael	0.50	357.75	121,356.90	WO	HD	TR

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

Trans Date	Index	Description of Service Rendered	Timekeeper	Hours	Fees	Sum	Circle		Action	
06/16/20	8123424	Prepare joint motion and corresponding protective order in connection with Peterson production (1.4); confer with Form-Craft Business Systems, Inc. regarding subpoena (.4).	Aspis, Norman	1.80	729.00	122,085.90	WO	HD	TR	
06/16/20	8123684	Analysis and determination of privileged documents in preparation for attorney review.	Peng, Simona	0.10	29.25	122,115.15	WO	HD	TR	
06/16/20	8134401	Analysis and review of correspondence re: privilege review, respository production and timing issues.	Farrell, Michael	0.60	429.30	122,544.45	WO	HD	TR	
06/17/20	8123533	Analyze and revise joint motion for protective order covering document production by K. Peterson, Kim Funding etc. (.8) communications with counsel for K. Peterson re: same (.2) advise on issues re: Form Craft subpoena production (.2) address issues regarding supplemental document production by Caldarelli investors (.2)	Fates, Edward (Ted)	1.40	831.60	123,376.05	WO	HD	TR	
06/17/20	8124200	Confer with counsel regarding subpoena productions and potential protective order to govern the same (.5); correspond with S. Metzger regarding R. Houts' production (.1).	Aspis, Norman	0.60	243.00	123,619.05	WO	HD	TR	
06/17/20	8125523	Several emails/call with counsel related to Kim subpoena (.4).	Zaro, David	0.40	315.00	123,934.05	WO	HD	TR	
06/17/20	8133453	Telephone conference, analysis and review of e-mails/documents re: investor settlement with Chicago Title and potential impacts of same on receivership.	Farrell, Michael	0.80	572.40	124,506.45	WO	HD	TR	

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Trans Date	Index	Description of Service Rendered	Timekeeper	Hours	Fees	Sum	Circle	Action	
06/18/20	8124371	Analysis and determination of document productions in preparation for attorney review.	Peng, Simona	0.20	58.50	124,564.95	WO	HD	TR
06/18/20	8124561	Communications with counsel for Champion-Cain re: time frame to complete AC privilege review	Fates, Edward (Ted)	0.20	118.80	124,683.75	WO	HD	TR
06/18/20	8131012	Review revised correspondence from R. Houts and confer with R. Houts' counsel regarding the same (.5); gather and transmit Caldarelli productions to K. Freitag (.3).	Aspis, Norman	0.80	324.00	125,007.75	WO	HD	TR
06/18/20	8132225	Telephone conference and analysis re: potential additional investigations and strategy re: same (.3); telephone conference, analysis and exchange of e-mails re: privilege review issues and timing (.3); analysis re: potential two stage respository production (.2).	Farrell, Michael	0.80	572.40	125,580.15	WO	HD	TR
06/19/20	8125419	Analysis and determination of responsive documents in preparation for attorney review.	Peng, Simona	1.00	292.50	125,872.65	WO	HD	TR
06/19/20	8125934	Analysis and review of e-mails re: privilege document review issues.	Farrell, Michael	0.30	214.65	126,087.30	WO	HD	TR
06/19/20	8126156	Communications with counsel for Champion-Cain, counsel for S. Cain, and Receiver regarding issues with Bandini property (.3) discuss issues re: ANI License Fund account with Receiver (.3)	Fates, Edward (Ted)	0.60	356.40	126,443.70	WO	HD	TR

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Trans Date	Index	Description of Service Rendered	Timekeeper	Hours	Fees	Sum	Circle	Action	
06/19/20	8126610	Review demand for funds in the ANI License Fund account at CalPrivate Bank and confer with counsel regarding the same (.2).	Aspis, Norman	0.20	81.00	126,524.70	WO	HD	TR
06/22/20	8126488	Meet and confer communications with counsel for K. Peterson/Kim Funding re: protective order for document production pursuant to subpoenas (.3) address issues re: timing of privilege review and production of ANI document repository (.2)	Fates, Edward (Ted)	0.50	297.00	126,821.70	WO	HD	TR
06/22/20	8128159	Analysis and exchange of various e-mails re: timing and cost of defendant's privilege review, effect of same on repository, and strategy to address same (.9).	Farrell, Michael	0.90	643.95	127,465.65	WO	HD	TR
06/23/20	8127882	Communications with counsel for First Choice Bank and counsel for S. Cain re: issues relating to Bandini property (.3) communications with counsel for K. Peterson re: protective order (.4)	Fates, Edward (Ted)	0.70	415.80	127,881.45	WO	HD	TR
06/23/20	8129838	Confer with Form-Craft Business Systems, Inc. regarding subpoena issues (.4); review and revise joint motion regarding Peterson productions and confer with counsel regarding the same (1.2); confer with counsel and S. Hoslett regarding Chicago Title production (.2).	Aspis, Norman	1.80	729.00	128,610.45	WO	HD	TR
06/23/20	8132190	Analysis and review of e-mails re: cost issues for repository production (.3); review, analysis and exchange of various e-mails re: Peterson document production, proposed protective order issues, costs and	Farrell, Michael	1.20	858.60	129,469.05	WO	HD	TR

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Trans Date	Index	Description of Service Rendered strategy (.9).	Timekeeper	Hours	Fees	Sum	Circle Action			
06/24/20	8128940	Revisions to joint motion re: protective order for K. Peterson and Kim Funding document productions (.4) advise on issues re: document subpoenas for records for K. Peterson-related bank accounts and demand for turnover re: ANI License Fund account (.5) discuss same with S. Hoslett (.3) advise on issues re: CTC document production and missing escrow summaries (.5) call with counsel for S. Cain re: issues relating to Bandini property (.4)	Fates, Edward (Ted)	2.10	1,247.40	130,716.45	WO	HD	TR	_____
06/24/20	8130177	Analysis and determination of document productions in preparation for attorney review.	Peng, Simona	0.30	87.75	130,804.20	WO	HD	TR	_____
06/25/20	8130442	Call/emails with counsel for K. Peterson re: documents requested pursuant to subpoena and production of same as part of ANI document repository	Fates, Edward (Ted)	0.60	356.40	131,160.60	WO	HD	TR	_____
06/25/20	8131008	Confer with S. Hoslett regarding Union Bank records, (.2).	Aspis, Norman	0.20	81.00	131,241.60	WO	HD	TR	_____
06/25/20	8132163	Review, analysis and exchange of e-mails and review of materials re: settlement and confidentiality issues for potential settlement.	Farrell, Michael	0.80	572.40	131,814.00	WO	HD	TR	_____
06/26/20	8131359	Advise on issues re: document productions in response to subpoenas issues to Form Craft, CTC and R. Houts (.3) meet and confer communications with SEC counsel and counsel for Champion-Cain re: joint	Fates, Edward (Ted)	0.90	534.60	132,348.60	WO	HD	TR	_____

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Trans Date	Index	Description of Service Rendered	Timekeeper	Hours	Fees	Sum	Circle	Action	
		motion re: protective order for K. Peterson production (.3) analyze order approving repository, cost-sharing, and amendments to protective order (.3)							
06/26/20	8132047	Review and analysis of notice re: repository motion and exchanged e-mails re: same (.3); analysis re: timing issues for production (.2).	Farrell, Michael	0.50	357.75	132,706.35	WO	HD	TR
06/26/20	8132339	Confer with counsel for Chicago Title regarding its production, and confer with counsel regarding the same (.4); confer with Dave at Form-Craft Business regarding subpoena response (.2); follow-up regarding joint motion for Peterson production (.1).	Aspis, Norman	0.70	283.50	132,989.85	WO	HD	TR
06/29/20	8132857	Advise on issues re: R. Houts document production and privilege claims, revisions to joint motion re: protective order for K. Peterson document production	Fates, Edward (Ted)	0.50	297.00	133,286.85	WO	HD	TR
06/29/20	8133177	Analysis and determination of document productions in preparation for attorney review.	Peng, Simona	0.20	58.50	133,345.35	WO	HD	TR
06/29/20	8137399	Correspond with S. Metzger regarding R. Houts' production of documents (.6); and review R. Houts' production (1.7); revise joint motion for Peterson productions in light of Court's modified protective order for the document repository (.4); digest production from Form-Craft Business System's Inc. and transmit the same to K. Freitag and L. Ryan (.4); confer with S. Hoslett regarding	Aspis, Norman	3.20	1,296.00	134,641.35	WO	HD	TR

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Trans Date	Index	Description of Service Rendered	Timekeeper	Hours	Fees	Sum	Circle	Action	
		Chicago Title production (.1).							
06/30/20	8134237	Advise on issues re: document repository, costs, timing of production and related issues	Fates, Edward (Ted)	0.20	118.80	134,760.15	WO	HD	TR _____
06/30/20	8137253	Review, revise, finalize, and transmit joint motion regarding Peterson productions, and prepare for filing (.7); draft corresponding proposed order (.3); correspond with counsel for Chicago Title regarding production of missing escrow ledger listings (.1); confer with Union Bank representative regarding missing wire transfer activity reports (.3).	Aspis, Norman	1.40	567.00	135,327.15	WO	HD	TR _____
06/30/20	8138030	Review, analysis and exchange of various e-mails re: issues and timing for production of documents from repository and analysis re: same.	Farrell, Michael	1.20	858.60	136,185.75	WO	HD	TR _____

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

Trans Date	Index	Type	Quantity	Amt	Circle	Action	
04/01/20	2641337	ADV – JF Zimmerman & Assoc. - Locate & Asset Investigation	0.00	375.00	WO	HD	TR _____
04/01/20	2641338	ADV – JF Zimmerman & Assoc. - Nationwide Bank & Brokerage	0.00	995.00	WO	HD	TR _____
04/01/20	2641339	ADV – JF Zimmerman & Assoc. - Locate & Asset Investigation	0.00	375.00	WO	HD	TR _____
04/01/20	2641340	ADV – JF Zimmerman & Assoc. - Nationwide Bank & Brokerage	0.00	995.00	WO	HD	TR _____
04/01/20	2641341	ADV – JF Zimmerman & Assoc. - Locate & Asset Investigation	0.00	150.00	WO	HD	TR _____

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

Trans Date	Index	Type	Quantity	Amt				
04/01/20	2641342	ADV – JF Zimmelman & Assoc. - Locate & Asset Investigation	0.00	150.00	WO	HD	TR	_____
04/01/20	2644265	EDISC – CS Disco, Inc. - Monthly Hosting for April 2020	0.00	4,259.70	WO	HD	TR	_____
04/01/20	2644549	EDISC – CS Disco, Inc. - Project & Data Management for March 2020	0.00	437.50	WO	HD	TR	_____
04/06/20	2649759	DCSRCH – Pacer 0120 - 03/20 Usage	0.00	5.20	WO	HD	TR	_____
04/06/20	2649760	DCSRCH – Pacer 0120 - 03/20 Usage	0.00	2.50	WO	HD	TR	_____
04/29/20	2645286	BW – Duplication - Black & White Copies	22.00	2.20	WO	HD	TR	_____
04/29/20	2645287	COLOR – Duplication - Color Copies	2.00	0.20	WO	HD	TR	_____
04/29/20	2647727	MSNGR – Federal Express - Ship To: Jason Foulds	0.00	12.78	WO	HD	TR	_____
05/01/20	2648894	EDISC – CS Disco, Inc. - Monthly Hosting for May 2020	0.00	358.56	WO	HD	TR	_____
05/07/20	2648290	MSNGR – Federal Express - Ship To: Donna Hamilton, Sr Escrow Offi	0.00	12.68	WO	HD	TR	_____
05/07/20	2649142	DCSRCH – First Legal Network, LLC - USDC - San Diego, Order Granting Sale Motion	0.00	95.00	WO	HD	TR	_____
05/08/20	2647674	BW – Duplication - Black & White Copies	14.00	1.40	WO	HD	TR	_____
05/08/20	2648292	MSNGR – Federal Express - Ship To: Donna Hamilton, Sr Escrow Off	0.00	12.68	WO	HD	TR	_____
05/08/20	2649143	DCSRCH – First Legal Network, LLC - USDC - San Diego, Order Granting Receiver's Motion	0.00	45.00	WO	HD	TR	_____
05/12/20	2648295	MSNGR – Federal Express - Ship To: Stefany Twamley	0.00	12.68	WO	HD	TR	_____
05/12/20	2649144	DCSRCH – First Legal Network, LLC - USDC - San Diego, Obtain a Certified Copy of Order Granting Motion	0.00	44.00	WO	HD	TR	_____
05/21/20	2648806	BW – Duplication - Black & White Copies	22.00	2.20	WO	HD	TR	_____

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

Trans Date	Index	Type	Quantity	Amt				
05/21/20	2648807	COLOR – Duplication - Color Copies	2.00	0.20	WO	HD	TR	_____
05/21/20	2650282	MSNGR – Federal Express - Ship To: Matthew Rattner	0.00	12.70	WO	HD	TR	_____
06/01/20	2652256	EDISC – CS Disco, Inc. Monthly Hosting for June 2020	0.00	358.56	WO	HD	TR	_____
06/03/20	2653024	DCSRCH – First Legal Network, LLC - USDC - San Diego, Obtain Certified Copy of Order	0.00	84.75	WO	HD	TR	_____
06/04/20	2651122	COLOR – Duplication - Color Copies	1.00	0.10	WO	HD	TR	_____
06/04/20	2652116	MSNGR – Federal Express - Ship To: Donna Hamilton, Sr Escrow Off	0.00	12.85	WO	HD	TR	_____
06/12/20	2653113	POS – Nationwide Legal, LLC - Form-Craft Business Systems c/o Edward A. Soens, Subpoena to Produce Documents, Information, or Objects or to Permit Inspection of Premises	0.00	185.00	WO	HD	TR	_____
06/18/20	2652665	COURT – -San Diego Superior Court,Obtain copies of various pleadings from Court's docket.	0.00	130.06	WO	HD	TR	_____

Proforma Summary

Timekeeper

Number	Timekeeper	Hours	Rate	Amounts
000313	Zaro, David	7.40	787.50	5,827.50
000739	Farrell, Michael	84.70	715.50	60,602.85
000820	Kaup, John	7.50	292.50	2,193.75
001665	Fates, Edward (Ted)	63.00	594.00	37,422.00
002209	Griffin, Peter	3.30	445.50	1,470.15
002307	Peng, Simona	7.30	292.50	2,135.25
002369	Aspis, Norman	63.30	405.00	25,636.50
002381	Elder, Stephanie	1.90	472.50	897.75
		<hr/>		
		238.40		\$136,185.75
Subtotal Fees				\$136,185.75
Discount				0.00
Total Fees				136,185.75
Total Disbursements				9,128.50

12/15/20 17:50:59 PROFORMA STATEMENT FOR MATTER 378827.00003 (Krista Freitag, as Receiver for ANI Deve) (SEC v. Champion-Cain - Asset Investigati)

Attorney Billing Instructions

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

Billing Instructions

expires 6/30/2021: 10% off standard rates (automatic); no text editing; copies @ .10

Account Summary – As Of 12/15/20

	Fiscal YTD			Calendar YTD			LTD		
	Total	Fees	Disb.	Total	Fees	Disb.	Total	Fees	Disbursements
Worked	291,025.35	291,025.35	0.00	592,766.35	583,637.85	9,128.50	145,314.25	136,185.75	9,128.50
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	103,126.95	103,126.95	0.00	103,126.95	103,126.95	0.00
Collected	0.00	0.00	0.00	103,126.95	103,126.95	0.00	103,126.95	103,126.95	0.00
AR Write Off	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00
WIP	589,702.87	583,637.85	6,065.02						
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

}

12/15/20 17:51:01 PROFORMA STATEMENT FOR MATTER 378827.00004 (Krista Freitag, as Receiver for ANI Deve) (SEC v. Champion-Cain - Reporting)

Preliminary Billing FormBilling Atty: 001665 - Fates, Edward
(Ted)

Matter #: 378827.00004

Client Name: Krista Freitag, as Receiver for ANI Deve

Date of Last Billing: 04/29/20

Matter Name: SEC v. Champion-Cain - Reporting

Proforma Number: 1066453

Client/Matter Joint Group # 378827-1

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

Trans Date	Index	Description of Service Rendered	Timekeeper	Hours	Fees	Sum	Circle	Action		
04/08/20	8058703	Initial discussion re: content and preparation of third interim report with Receiver	Fates, Edward (Ted)	0.20	118.80	118.80	WO	HD	TR	_____
05/12/20	8091936	Work on Receiver's 3rd interim report (2.3) discuss same with Receiver (.3)	Fates, Edward (Ted)	2.60	1,544.40	1,663.20	WO	HD	TR	_____
05/14/20	8093554	Work on revisions to Receiver's 3rd interim report (.4) discuss same and exhibit to report with Receiver (.5)	Fates, Edward (Ted)	0.90	534.60	2,197.80	WO	HD	TR	_____
05/15/20	8094679	Discuss revisions/updates to report and asset schedule exhibit with Receiver (.2) work on same (.2)	Fates, Edward (Ted)	0.40	237.60	2,435.40	WO	HD	TR	_____
05/18/20	8096205	Meet and confer communications with Receiver re: 3rd interim report	Fates, Edward (Ted)	0.20	118.80	2,554.20	WO	HD	TR	_____
05/19/20	8097369	Discuss updates/revisions to report with Receiver (.2) work on same (.1)	Fates, Edward (Ted)	0.30	178.20	2,732.40	WO	HD	TR	_____

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

Trans Date	Index	Description of Service Rendered	Timekeeper	Hours	Fees	Sum	Circle	Action	
05/28/20	8106220	Meet and confer communications with SEC counsel re: 3rd interim report, advise Receiver re: same	Fates, Edward (Ted)	0.20	118.80	2,851.20	WO	HD	TR
06/10/20	8117870	Final revisions/updates to 3rd interim report (.7) discuss same with Receiver and G. Rodriguez (.2)	Fates, Edward (Ted)	0.90	534.60	3,385.80	WO	HD	TR

Proforma Summary

Timekeeper Number	Timekeeper	Hours	Rate	Amounts
001665	Fates, Edward (Ted)	5.70	594.00	3,385.80
		5.70		\$3,385.80
Subtotal Fees				\$3,385.80
Discount				0.00
Total Fees				3,385.80
Total Disbursements				0.00

Attorney Billing Instructions

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

Billing Instructions

expires 6/30/2021: 10% off standard rates (automatic); no text editing; copies @ .10
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Account Summary – As Of 12/15/20

	Fiscal YTD			Calendar YTD			LTD		
	Total	Fees	Disb.	Total	Fees	Disb.	Total	Fees	Disbursements
Worked	5,328.45	5,328.45	0.00	18,471.60	18,471.60	0.00	3,385.80	3,385.80	0.00
Unbilled Adj	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00

12/15/20 17:51:01 PROFORMA STATEMENT FOR MATTER 378827.00004 (Krista Freitag, as Receiver for ANI Deve) (SEC v. Champion-Cain - Reporting)

Billed	0.00	0.00	0.00	24,900.30	24,900.30	0.00	24,900.30	24,900.30	0.00
Collected	0.00	0.00	0.00	24,900.30	24,900.30	0.00	24,900.30	24,900.30	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	18,471.60	18,471.60	0.00
Balance			
AR Balance	0.00	0.00	0.00
Unalloc	0.00		
Payment			
Client Trust	0.00		
Balance			

Billing Address

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

}

12/15/20 17:51:02 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: 04/29/20

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

Proforma Number: 1066453

Client/Matter Joint Group # 378827-1

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

Trans Date	Index	Description of Service Rendered	Timekeeper	Hours	Fees	Sum	Circle	Action	
04/01/20	8051723	Advise Receiver re: Pullman sale closing issues (.4) analyze COVID-19 related financial relief for operating businesses and advise Receiver re: same (.7) discuss sale of 3415 Mission Blvd with Receiver (.2)	Fates, Edward (Ted)	1.30	772.20	772.20	WO	HD	TR
04/01/20	8052130	Begin drafting the purchase and sale agreement for 3451 Mission Boulevard with Issam and Suha Hurmiz; correspond with the client re: such agreement.	Thiels, Megan	1.60	518.40	1,290.60	WO	HD	TR
04/01/20	8052326	Revise liquor license purchase and sale agreement to reflect buyer requested revisions.	Klinger, Warren	1.40	661.50	1,952.10	WO	HD	TR
04/02/20	8053558	Advise G. Rodriguez re: issues with sale cancellation by Tennyson Street buyer (.4) advise on issues re: Carmel property lender and sale closing (.2) communications with counsel for lender (.2) work on accounting of costs of sale for Carmel property, discuss same with Receiver (.4)	Fates, Edward (Ted)	1.20	712.80	2,664.90	WO	HD	TR

12/15/20 17:51:02 PROFORMA STATEMENT FOR MATTER 378827.00005 (Krista Freitag, as Receiver for ANI Deve) (SEC v. Champion-Cain - Operations & Asse)

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

Trans Date	Index	Description of Service Rendered	Timekeeper	Hours	Fees	Sum	Circle Action			
04/03/20	8055221	Analyze and advise Receiver on issues with potential application for financial relief under COVID-19 stimulus package	Fates, Edward (Ted)	0.50	297.00	2,961.90	WO	HD	TR	_____
04/06/20	8056329	Review Restaurant Management Agreement and prepare amendment to extend Term and remove Patio on Lamont (1.8); review Lease documents for Surf Rider Ocean Beach and prepare amendment to Lease (2.6).	Lorenzen, Jonathan	4.40	2,296.80	5,258.70	WO	HD	TR	_____
04/06/20	8056351	Address issues re: extension of CRG Management Services Agreement, discuss same with Receiver (.3) address issues re: lease amendment for Surf Rider OB space (.2) advise Receiver re: denial of application for loan under COVID-19 stimulus package (.3) advise Receiver on potential Cultivate/CBD transaction (.3) advise Receiver re: purchase offer for LM Surf Rider property (.2)	Fates, Edward (Ted)	1.30	772.20	6,030.90	WO	HD	TR	_____
04/06/20	8056835	Correspond with the client re: the open issues for the 3415 Mission Boulevard purchase and sale agreement; continue editing and revising the purchase and sale agreement for 3415 Mission Boulevard based on the client's feedback.	Thiels, Megan	1.30	421.20	6,452.10	WO	HD	TR	_____
04/07/20	8057166	Communications with Receiver and G. Rodriguez re: overbid deadline for Swell Coffee and Saska's properties (.4) work on notices re: same (.6) discuss COVID-19 loan programs and tax relief measures with Receiver (.4) advise Receiver and G.	Fates, Edward (Ted)	2.10	1,247.40	7,699.50	WO	HD	TR	_____

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

Trans Date	Index	Description of Service Rendered	Timekeeper	Hours	Fees	Sum	Circle	Action	
		Rodriguez re: communications with tenant re: COVID-19 rent relief concerns, revise letter re: same (.7)							
04/07/20	8058675	Analysis of escrow instructions.	Klinger, Warren	1.20	567.00	8,266.50	WO	HD	TR
04/08/20	8058257	Review and revise Purchase and Sale Agreement for 3415 Mission Blvd property and review related correspondence.	Lorenzen, Jonathan	1.80	939.60	9,206.10	WO	HD	TR
04/08/20	8058676	Analysis of escrow instructions.	Klinger, Warren	1.30	614.25	9,820.35	WO	HD	TR
04/08/20	8060419	Continue drafting, editing and revising the purchase and sale agreement for 3415 Mission Boulevard.	Thiels, Megan	0.60	194.40	10,014.75	WO	HD	TR
04/09/20	8059589	Review and revise Purchase and Sale Agreements.	Lorenzen, Jonathan	0.90	469.80	10,484.55	WO	HD	TR
04/09/20	8059610	Advise on terms and revisions for purchase and sale agreement for 3415 Mission Blvd	Fates, Edward (Ted)	0.30	178.20	10,662.75	WO	HD	TR
04/09/20	8079806	Edit and revise the purchase and sale agreement with Issam and Shua Hurmiz for 3415 Mission Boulevard including, but not limited to, the provisions regarding the return of the security deposit, early release of the security deposit, notice, and the grant deed.	Thiels, Megan	0.70	226.80	10,889.55	WO	HD	TR
04/10/20	8060301	Coordinate execution of lease documents.	Lorenzen, Jonathan	0.30	156.60	11,046.15	WO	HD	TR

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

Trans Date	Index	Description of Service Rendered	Timekeeper	Hours	Fees	Sum	Circle	Action	
04/13/20	8062101	Advise Receiver re: issues with auction and pick up of sold equipment (.2) advise on initial response to media inquiry (.2)	Fates, Edward (Ted)	0.40	237.60	11,283.75	WO	HD	TR
04/14/20	8063779	Advise Receiver on issues with pending trademarks	Fates, Edward (Ted)	0.20	118.80	11,402.55	WO	HD	TR
04/15/20	8064615	Communications with G. Rodriguez re: overbids for Zanzibar property (.1) prepare notice re: non-receipt of overbids and lack of opposition (.3)	Fates, Edward (Ted)	0.40	237.60	11,640.15	WO	HD	TR
04/16/20	8065928	Analyze ANICO response to sale motion re: parking lot property and advise Receiver re: same (.2) address inquiry from media and discuss same with Receiver (.5) advise Receiver re: response to inquiry concerning Friends of Presidio Golf Course entity (.2)	Fates, Edward (Ted)	0.90	534.60	12,174.75	WO	HD	TR
04/20/20	8068724	Discuss potential sales of Surf Rider Crown Point, 3415 Mission Blvd, and University Ave. property with Receiver (.3) revise addendum to purchase and sale agreement for Tennyson Street (.4) discuss same with G. Rodriguez (.1)	Fates, Edward (Ted)	0.80	475.20	12,649.95	WO	HD	TR
04/22/20	8071319	Discuss issues re: Bill of Sale for Patio 101 liquor license with Receiver (.2) advise on escrow instructions for liquor license sale (.2)	Fates, Edward (Ted)	0.40	237.60	12,887.55	WO	HD	TR
04/22/20	8071455	Review correspondence regarding status of Purchase and Sale Agreements.	Lorenzen, Jonathan	1.40	730.80	13,618.35	WO	HD	TR
04/22/20	8071876	Analysis and revisions to escrow instructions for Saska.	Klinger, Warren	1.60	756.00	14,374.35	WO	HD	TR

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

Trans Date	Index	Description of Service Rendered	Timekeeper	Hours	Fees	Sum	Circle	Action	
04/22/20	8080821	Begin drafting the new purchase and sale agreement for the crown point property with Greg Velasquez; review and analyze the letter of intent provided by the client.	Thiels, Megan	2.40	777.60	15,151.95	WO	HD	TR
04/23/20	8072225	Review issues related to Crown Point Purchase and Sale Agreement, and review draft of Agreement.	Lorenzen, Jonathan	0.90	469.80	15,621.75	WO	HD	TR
04/23/20	8072295	Communications with G. Rodriguez re: lack of overbids for parking lot property and Bao Beach assets (.2) prepare notices of non-receipt of overbids and lack of opposition (.3) advise Receiver on issues re: anticipated closing of Saska's property (.2) advise Receiver re: response to media inquiries re: restaurant sales and D. Champion settlement (.4)	Fates, Edward (Ted)	1.10	653.40	16,275.15	WO	HD	TR
04/23/20	8073909	Research the California Business and Professions Code as it relates to liquor license transfers and exemptions for receivers.	Klinger, Warren	1.10	519.75	16,794.90	WO	HD	TR
04/23/20	8075905	Call with counsel related to Keller Property sell (.2). Emails concerning real property sale motions and follow-up with counsel (.2).	Zaro, David	0.40	315.00	17,109.90	WO	HD	TR
04/23/20	8081019	Finish editing and revising the new purchase and sale agreement for the crown point property with Greg Velasquez; correspond with the client re: such purchase and sale agreement; begin reviewing and analyzing the buyer's	Thiels, Megan	1.40	453.60	17,563.50	WO	HD	TR

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

Trans Date	Index	Description of Service Rendered	Timekeeper	Hours	Fees	Sum	Circle	Action	
		comments to the purchase and sale agreement with Issam and Shua Hurmiz for 3415 Mission Boulevard.							
04/24/20	8073983	Review Buyer's comments to Purchase and Sale Agreement for Crown Point, and updated offer from alternate purchaser of property.	Lorenzen, Jonathan	0.90	469.80	18,033.30	WO	HD	TR
04/24/20	8074075	Address issues re: purchase and sale agreement for 3415 Mission property and escrow instructions for Saska's liquor license transfer	Fates, Edward (Ted)	0.30	178.20	18,211.50	WO	HD	TR
04/24/20	8075347	Revisions to escrow instructions (1.0); Attention to costs and expenses provisions in purchase and sale agreement and escrow instructions (.5).	Klinger, Warren	1.50	708.75	18,920.25	WO	HD	TR
04/24/20	8081046	Continue editing and revising the purchase and sale agreement for 3415 Mission Boulevard with Issam and Shua Hurmiz; review and analyze the new all-cash offer for 3415 Mission Boulevard from Thomas Funke; correspond with the client re: the changes made by Thomas Funke in the new proposed purchase and sale agreement.	Thiels, Megan	1.10	356.40	19,276.65	WO	HD	TR
04/27/20	8075755	Review updated Purchase and Sale Agreement for 3415 Mission.	Lorenzen, Jonathan	0.80	417.60	19,694.25	WO	HD	TR
04/27/20	8075822	Advise Receiver re: insurance issues	Fates, Edward (Ted)	0.20	118.80	19,813.05	WO	HD	TR

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

Trans Date	Index	Description of Service Rendered	Timekeeper	Hours	Fees	Sum	Circle	Action	
04/27/20	8081097	Continue drafting the new purchase and sale agreement for 3415 Mission Blvd with Thomas Funke; prepare clean and redline versions of such new agreement; correspond with the client re: such new agreement.	Thiels, Megan	1.60	518.40	20,331.45	WO	HD	TR
04/28/20	8077218	Communications with Receiver and court chambers re: pending sale motions	Fates, Edward (Ted)	0.30	178.20	20,509.65	WO	HD	TR
04/28/20	8081121	Review and analyze the purchase and sale agreement signed by Thomas Funke for 3415 Mission Boulevard; prepare a final execution version of such agreement for the client's signature; correspond with the client re: such final execution version of the agreement.	Thiels, Megan	0.70	226.80	20,736.45	WO	HD	TR
04/29/20	8078733	Discuss anticipated sales of receivership properties and motions to approve same with Receiver	Fates, Edward (Ted)	0.30	178.20	20,914.65	WO	HD	TR
04/29/20	8081160	Prepare redline of the purchase and sale agreement for crown point executed by Greg Velasquez; correspond with the client re: the changes made to such agreement by the buyer; begin editing and revising such agreement with buyer's acceptable comments; begin drafting the new purchase and sale agreement for the University Ave property with David Kurniadi.	Thiels, Megan	1.80	583.20	21,497.85	WO	HD	TR
04/30/20	8081325	Review comments to Purchase and Sale Agreements and related correspondence for University Avenue and Crown Point properties.	Lorenzen, Jonathan	0.80	417.60	21,915.45	WO	HD	TR

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

Trans Date	Index	Description of Service Rendered	Timekeeper	Hours	Fees	Sum	Circle	Action	
04/30/20	8081944	Analysis of escrow instructions, specifically with attention to exemptions for receivers from certain requirements in the California Business and Professions Code.	Klinger, Warren	1.30	614.25	22,529.70	WO	HD	TR
04/30/20	8082307	Communications with Receiver re: extension of Pullman sale closing date	Fates, Edward (Ted)	0.20	118.80	22,648.50	WO	HD	TR
04/30/20	8083045	Finish preparing the final execution version of the Crown Point purchase and sale agreement with the C & G Velasquez Family Trust.	Thiels, Megan	1.10	356.40	23,004.90	WO	HD	TR
05/01/20	8083925	Discuss issues re: restaurant insurance coverage and claim re: same with Receiver	Fates, Edward (Ted)	0.30	178.20	23,183.10	WO	HD	TR
05/01/20	8084201	Review correspondence regarding status of Purchase and Sale Agreements (0.2); review and revise Purchase and Sale Agreement for University Avenue (0.7).	Lorenzen, Jonathan	0.90	469.80	23,652.90	WO	HD	TR
05/01/20	8093581	Continue editing and revising the purchase and sale agreement for the University Avenue property with David Kurniadi.	Thiels, Megan	1.20	388.80	24,041.70	WO	HD	TR
05/04/20	8084680	Finish editing and revising the purchase and sale agreement with David Kurniadi for the University Avenue property; prepare clean and redline versions of such agreement and correspond with the client re: such agreement.	Thiels, Megan	0.40	129.60	24,171.30	WO	HD	TR
05/04/20	8084925	Analyze information re: business reopening plan in CA as applicable to co-work business and advise Receiver re: same	Fates, Edward (Ted)	0.40	237.60	24,408.90	WO	HD	TR

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

Trans Date	Index	Description of Service Rendered	Timekeeper	Hours	Fees	Sum	Circle	Action	
05/06/20	8087304	Analyze order approving Swell, Saska's and Bao Beach sales and advise Receiver re: same	Fates, Edward (Ted)	0.40	237.60	24,646.50	WO	HD	TR
05/07/20	8088120	Review issues for Ocean Beach property.	Lorenzen, Jonathan	1.10	574.20	25,220.70	WO	HD	TR
05/07/20	8088363	Discuss sale motion for Crown Point restaurant with G. Rodriguez (.2) initial work on same (.3) analyze Bao Beach lease assignment issues and discuss same with Receiver (.4)	Fates, Edward (Ted)	0.90	534.60	25,755.30	WO	HD	TR
05/07/20	8088446	Continue editing, revising and drafting the purchase and sale agreement for the property located at 3415 Mission Boulevard with Issam and Shua Hurmiz, including, but not limited to, the provisions regarding the interior residential inspections; prepare clean and redline versions of such revised agreement; correspond with the client re: such revised draft of the agreement.	Thiels, Megan	3.10	1,004.40	26,759.70	WO	HD	TR
05/08/20	8089066	Analyze order approving sale of parking lot property and advise Receiver re: same (.3) work on motion for approval of sale of Crown Point property (1.3) discuss same with Receiver (.3) discuss Bao Beach lease amendment issues with Receiver (.2)	Fates, Edward (Ted)	2.10	1,247.40	28,007.10	WO	HD	TR
05/11/20	8090472	Communications with Receiver and G. Rodriguez re: revisions to motion re: sale of Crown Point property (.3) work on same (.8) work on Receiver declaration in support of sale motion (.9) discuss same with Receiver	Fates, Edward (Ted)	3.10	1,841.40	29,848.50	WO	HD	TR

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

Trans Date	Index	Description of Service Rendered	Timekeeper	Hours	Fees	Sum	Circle	Action	
		(.2) work on proposed order and notice of motion (.3) analyze Bao Beach lease issues and discuss with Receiver (.2) assist G. Rodriguez with letter to tenant re: termination of lease (.4)							
05/11/20	8091257	Begin editing and revising the purchase and sale agreement with David Kurniadi including, but not limited to, the provisions relating to the due diligence and financing contingencies.	Thiels, Megan	0.40	129.60	29,978.10	WO	HD	TR
05/12/20	8091475	Advise Receiver re: Surf Rider OB lease issues (.2) analyze order approving Zanzibar sale and advise Receiver re: same (.3)	Fates, Edward (Ted)	0.50	297.00	30,275.10	WO	HD	TR
05/12/20	8091713	Review and revise Purchase and Sale Agreement for University Avenue (0.8); prepare Second Amendment to Lease for Surfrider Ocean Beach (1.1); review correspondence regarding issues for Ocean Beach property (0.3).	Lorenzen, Jonathan	2.20	1,148.40	31,423.50	WO	HD	TR
05/12/20	8093583	Finish editing and revising the purchase and sale agreement with David Kurniadi for the property located on University Avenue; prepare revised clean and redline versions of such agreement and correspond with the client re: such revised draft of the agreement.	Thiels, Megan	1.80	583.20	32,006.70	WO	HD	TR
05/13/20	8093138	Advise G. Rodriguez re: revisions to Owner's Affidavit for Zanzibar sale	Fates, Edward (Ted)	0.30	178.20	32,184.90	WO	HD	TR

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

Trans Date	Index	Description of Service Rendered	Timekeeper	Hours	Fees	Sum	Circle Action		
05/13/20	8093584	Compare the purchase and sale agreement for the property located on University Avenue executed by David Kurniadi against the seller's last draft; correspond with the client re: such executed version of the agreement; continue editing and revising the new purchase and sale agreement for the Ocean Beach Surf Rider location with Khachapuri LLC.	Thiels, Megan	1.80	583.20	32,768.10	WO	HD	TR
05/14/20	8093709	Review and revise Purchase and Sale Agreement for Surf Rider Lease in Ocean Beach.	Lorenzen, Jonathan	0.60	313.20	33,081.30	WO	HD	TR
05/14/20	8093834	Edit and revise the purchase and sale agreement with Khachapuri for the OB Surf Rider lease; prepare clean and redline versions of such agreement and correspond with the client re: such agreement.	Thiels, Megan	0.60	194.40	33,275.70	WO	HD	TR
05/14/20	8094695	Analysis of escrow instructions.	Klinger, Warren	0.80	378.00	33,653.70	WO	HD	TR
05/15/20	8094975	Review Lease issues for Bao Beach property.	Lorenzen, Jonathan	1.70	887.40	34,541.10	WO	HD	TR
05/15/20	8095163	Compare the purchase and sale agreement executed by David Kurniadi for the property located on University Avenue against buyer's draft of the agreement; correspond with the client re: such buyer executed version of the agreement.	Thiels, Megan	0.30	97.20	34,638.30	WO	HD	TR
05/18/20	8096202	Review and revise Amendment to Lease for Surf Rider Ocean Beach (0.9); review and revise Assignment and Amendment for Bao	Lorenzen, Jonathan	2.60	1,357.20	35,995.50	WO	HD	TR

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

Trans Date	Index	Description of Service Rendered	Timekeeper	Hours	Fees	Sum	Circle	Action	
		Beach Sublease (1.7).							
05/18/20	8096326	Analyze and advise Receiver re: issues relating to potential sale of Swell Coffee trademarks	Fates, Edward (Ted)	0.30	178.20	36,173.70	WO	HD	TR _____
05/18/20	8096377	Continue editing and revising the second amendment to the Surf Rider Ocean Beach lease to provide for a second option term; Begin drafting the assignment and amendment of the Bao Beach lease assigning the lease to Oswaldo and Consuelo Rodriguez; begin drafting the assignment and first amendment to the Patio on Goldfitch purchase and sale agreement with Mission Hills Retail LLC.	Thiels, Megan	4.20	1,360.80	37,534.50	WO	HD	TR _____
05/19/20	8096965	Review status of Purchase and Sale Agreements.	Lorenzen, Jonathan	1.60	835.20	38,369.70	WO	HD	TR _____
05/19/20	8097374	Advise Receiver on issues re: liquor license sale from Patio on Goldfinch	Fates, Edward (Ted)	0.30	178.20	38,547.90	WO	HD	TR _____
05/19/20	8099952	Analysis of how to structure additional buyer into the amendment to the purchase and sale agreement	Klinger, Warren	0.90	425.25	38,973.15	WO	HD	TR _____
05/19/20	8107337	Edit and revise the purchase and sale agreement with Issam and Shua Hurmiz for the property located at 3415 Mission Blvd including, but not limited to, the provisions related to contingencies and the purchase price.	Thiels, Megan	0.70	226.80	39,199.95	WO	HD	TR _____
05/20/20	8098182	Review and revise Purchase and Sale Agreement for 3415 Mission (0.8); review	Lorenzen, Jonathan	2.50	1,305.00	40,504.95	WO	HD	TR _____

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

Trans Date	Index	Description of Service Rendered	Timekeeper	Hours	Fees	Sum	Circle	Action	
		issues for Goldfinch Purchase and Sale Agreement (0.8); review updated Purchase and Sale Agreement for Surf Rider LaMesa (0.9).							
05/20/20	8099477	Prepare clean and redline versions of the purchase and sale agreement with Issam and Shua Hurmiz for the property located at 3415 Mission Boulevard and correspond with the client re: such revised draft of the agreement; begin drafting the new purchase and sale agreement with Davles for the La Mesa Surf Rider property and correspond with the client re: such initial draft of the agreement.	Thiels, Megan	3.40	1,101.60	41,606.55	WO	HD	TR
05/20/20	8099953	Prepare amendment to purchase and sale agreement incorporating additional buyer concept.	Klinger, Warren	1.80	850.50	42,457.05	WO	HD	TR
05/21/20	8099482	Communications with Receiver and counsel for First Choice Bank re: closing of Swell Coffee property	Fates, Edward (Ted)	0.30	178.20	42,635.25	WO	HD	TR
05/21/20	8100447	Prepare amendment to purchase and sale agreement.	Klinger, Warren	2.10	992.25	43,627.50	WO	HD	TR
05/22/20	8101444	Communications with counsel for Champion-Cain re: Carmel sale closing docs	Fates, Edward (Ted)	0.20	118.80	43,746.30	WO	HD	TR
05/22/20	8101457	Review issues for The Patio on Goldfinch.	Lorenzen, Jonathan	0.60	313.20	44,059.50	WO	HD	TR
05/22/20	8101656	Prepare first amendment to purchase and sale agreement.	Klinger, Warren	4.90	2,315.25	46,374.75	WO	HD	TR

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

Trans Date	Index	Description of Service Rendered	Timekeeper	Hours	Fees	Sum	Circle	Action	
05/22/20	8107346	Begin drafting the overbid purchase and sale agreement for the crown point property.	Thiels, Megan	1.60	518.40	46,893.15	WO	HD	TR
05/23/20	8101938	Review Overbid Purchase and Sale Agreement for Crown Point.	Lorenzen, Jonathan	0.30	156.60	47,049.75	WO	HD	TR
05/25/20	8102275	Revise purchase and sale agreement amendment.	Klinger, Warren	2.00	945.00	47,994.75	WO	HD	TR
05/26/20	8102684	Discuss potential reopening of Keller co-work with Receiver (.3) analyze COVID-related orders and reopening issues (.8) advise Receiver re: Saska's sale and outstanding gift cards (.2) communications with Receiver and counsel for Champion-Cain re: tax-related documents for sale closings (.3) communications with food supply vendor re: UCC lien on Saska's personal property (.2) analyze and advise on issues re: liquor license transfer to buyer's designee for Patio on Goldfinch sale (.3)	Fates, Edward (Ted)	2.10	1,247.40	49,242.15	WO	HD	TR
05/26/20	8102704	Review Amendment to Goldfinch Purchase and Sale Agreement.	Lorenzen, Jonathan	0.40	208.80	49,450.95	WO	HD	TR
05/26/20	8103665	Finish editing and revising the overbid purchase and sale agreement for the crown point property located at 3445-3453 Ingraham Street; correspond with the client re: such overbid purchase and sale agreement.	Thiels, Megan	0.40	129.60	49,580.55	WO	HD	TR

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Trans Date	Index	Description of Service Rendered	Timekeeper	Hours	Fees	Sum	Circle Action			
05/26/20	8103714	Research state and local guidelines for re-opening Petaluma co-working business.	Williams, Rebecca	2.00	603.00	50,183.55	WO	HD	TR	_____
05/26/20	8103768	Revise purchase and sale agreement for receiver review (.8); attention to whether provisions in the agreement contemplate additional buyers (.3)	Klinger, Warren	1.10	519.75	50,703.30	WO	HD	TR	_____
05/27/20	8104302	Review Buyer issues for Patio on Goldfinch transaction.	Lorenzen, Jonathan	0.40	208.80	50,912.10	WO	HD	TR	_____
05/27/20	8104922	Analyze issues re: Keller co-work reopening issues and safety protocols, customer certifications, advise Receiver re: same (1.3)	Fates, Edward (Ted)	1.30	772.20	51,684.30	WO	HD	TR	_____
05/27/20	8106170	Revise amendment to purchase and sale agreement to remove references to deposit and purchase price so that amendment's sole purpose is to join liquor license buyer as an additional party and ensure that receiver is properly protected.	Klinger, Warren	1.90	897.75	52,582.05	WO	HD	TR	_____
05/28/20	8105996	Review Purchase and Sale Agreement for Crown Point.	Lorenzen, Jonathan	0.60	313.20	52,895.25	WO	HD	TR	_____
05/28/20	8106045	Address issues re: potential overbid and associated purchase and sale agreement for Crown Point property (.2) advise on issues re: reopening of Keller co-work and health/safety procedures for members (.5) discuss issues re: Pullman sale with Receiver (.2)	Fates, Edward (Ted)	0.90	534.60	53,429.85	WO	HD	TR	_____
05/28/20	8106952	Analyze issues regarding co-working facility reopening communications.	Bell, Melissa	1.10	445.50	53,875.35	WO	HD	TR	_____

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Trans Date	Index	Description of Service Rendered	Timekeeper	Hours	Fees	Sum	Circle Action			
05/28/20	8107262	Review and analyze the overbid purchase and sale agreement for the crown point property which was executed by the overbidders; prepare an internal redline of such executed overbid purchase and sale agreement; correspond with the client re: executing such agreement.	Thiels, Megan	0.40	129.60	54,004.95	WO	HD	TR	_____
05/29/20	8107850	Advise on reopening issues for Keller co-work (.4) communications with counsel for J. Lance re: sale efforts related to 809 and 812 San Rafael, discuss same with G. Rodriguez (.5) advise Receiver on issues re: escrow instructions for Patio on Goldfinch sale (.3)	Fates, Edward (Ted)	1.20	712.80	54,717.75	WO	HD	TR	_____
05/29/20	8108231	Review Lease Amendment for Surfrider Pizza Lease (0.2); coordinate closing issues for Bao Beach (0.5).	Lorenzen, Jonathan	0.70	365.40	55,083.15	WO	HD	TR	_____
05/29/20	8109079	Continue to analyze issues regarding co-working facility reopening communications and draft revised language for Membership Agreement regarding the same.	Bell, Melissa	0.70	283.50	55,366.65	WO	HD	TR	_____
05/29/20	8109159	Finalize amendment.	Klinger, Warren	0.20	94.50	55,461.15	WO	HD	TR	_____
05/29/20	8110221	Review and analyze the executed Bao Beach purchase and sale agreement to determine what is required for closing; review and analyze the court order authorizing the sale of the Bao Beach lease, fixtures, furniture and equipment; correspond with the escrow holder re: the	Thiels, Megan	0.90	291.60	55,752.75	WO	HD	TR	_____

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Trans Date	Index	Description of Service Rendered status of the Bao Beach transaction.	Timekeeper	Hours	Fees	Sum	Circle	Action	
06/01/20	8110865	Calls/emails with Receiver re: closure and security measures for La Mesa restaurants due to riots (.5) advise Receiver on issues re: vendor UCC security interest on personal property for Saska's (.2) communications with vendor re: same (.4) discuss need to amend sale approval order re: Bao Beach with Receiver (.2) work on joint motion re: same (.9) advise Receiver re: issues with security and exterior benches at Lamont Street property (.2) analysis of COVID-related orders relating to vacation rentals (.5)	Fates, Edward (Ted)	2.90	1,722.60	57,475.35	WO	HD	TR
06/01/20	8111395	Research whether short term vacation rentals are permitted to operate in San Diego County under existing state and local health orders.	Williams, Rebecca	2.80	844.20	58,319.55	WO	HD	TR
06/02/20	8111547	Meet and confer communications with SEC counsel and counsel for Champion-Cain re: joint motion to amend Bao Beach sale order (.3) prepare proposed order (.3) finalize joint motion (.2) advise Receiver re: legal issues re: COVID orders and vacation rentals (.3) prepare notice re: cancellation of vacation rental reservations (.6) discuss same with G. Rodriguez (.2)	Fates, Edward (Ted)	1.90	1,128.60	59,448.15	WO	HD	TR
06/03/20	8112617	Review latest SD ordinance pertaining to lodging and guest certification (.3) discuss same with G. Rodriguez (.2) revise correspondence to prospective vacation rental guests (.3) discuss issues re:	Fates, Edward (Ted)	1.30	772.20	60,220.35	WO	HD	TR

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Trans Date	Index	Description of Service Rendered	Timekeeper	Hours	Fees	Sum	Circle	Action	
		potential sale/assignment of ANI trademarks with Receiver (.3) review order amending Bao Beach sale order and advise Receiver re: same (.2)							
06/03/20	8112686	Review closing issues for Mission Boulevard transaction.	Lorenzen, Jonathan	0.50	261.00	60,481.35	WO	HD	TR
06/03/20	8121855	Begin drafting the overbid purchase and sale agreement with RSB Property Investors; prepare the bill of sale for the bao beach closing and correspond with escrow re: such bill of sale.	Thiels, Megan	0.90	291.60	60,772.95	WO	HD	TR
06/04/20	8113867	Review Sublease for Bao Beach Lease.	Lorenzen, Jonathan	0.20	104.40	60,877.35	WO	HD	TR
06/04/20	8114217	Advise G. Rodriguez re: issues with restrictions on vacation rentals under COVID orders	Fates, Edward (Ted)	0.30	178.20	61,055.55	WO	HD	TR
06/05/20	8114605	Prepare amendment to Restaurant Management Agreement with Cohn and revise based upon comments (1.1); review issues for 3415 Mission Blvd property and updated Purchase and Sale Agreement for alternate Buyer (0.5).	Lorenzen, Jonathan	1.60	835.20	61,890.75	WO	HD	TR
06/05/20	8114992	Advise Receiver re: overbid terms for prospective La Mesa sale	Fates, Edward (Ted)	0.20	118.80	62,009.55	WO	HD	TR
06/08/20	8115902	Review updated terms for Surf Rider LaMesa and related Overbid Purchase and Sale Agreement and prepare redraft of agreement (1.6); review executed version of Purchase and Sale Agreement for Crown	Lorenzen, Jonathan	1.90	991.80	63,001.35	WO	HD	TR

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Trans Date	Index	Description of Service Rendered Point (0.3).	Timekeeper	Hours	Fees	Sum	Circle	Action	
06/08/20	8116128	Call/emails with Receiver and G. Rodriguez re: overbid procedures, logistics and legal issues for auction of Crown Point property (.9) work on notice of receipt of qualified overbids (.4)	Fates, Edward (Ted)	1.30	772.20	63,773.55	WO	HD	TR _____
06/09/20	8116687	Revise auction instructions for bidders for Crown Point property and discuss same with Receiver	Fates, Edward (Ted)	0.90	534.60	64,308.15	WO	HD	TR _____
06/09/20	8117101	Review executed version of Purchase and Sale Agreements for Surf Rider LaMesa 3415 Mission, and Third Amendment to Management Agreement.	Lorenzen, Jonathan	1.10	574.20	64,882.35	WO	HD	TR _____
06/09/20	8118930	Call with counsel related to auction process and proposed sale (.2).	Zaro, David	0.20	157.50	65,039.85	WO	HD	TR _____
06/10/20	8117884	Review closing issues for 3768 Mission.	Lorenzen, Jonathan	2.90	1,513.80	66,553.65	WO	HD	TR _____
06/10/20	8119356	Finalize auction instructions and notice of receipt of qualified overbids for Crown Point sale (.4) assist with reconveyance for deed of trust and closing issues for Saska's sale (.8) advise Receiver re: security interest in Swell equipment (.3)	Fates, Edward (Ted)	1.50	891.00	67,444.65	WO	HD	TR _____
06/10/20	8133835	Review correspondence re: the release of the deed of trust on the property located at 3768 Mission Boulevard commonly known as Saska's Restaurant; begin drafting the release and reconveyance of the deed of trust on such property; correspond with the	Thiels, Megan	1.20	388.80	67,833.45	WO	HD	TR _____

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Trans Date	Index	Description of Service Rendered client re: the bao beach closing.	Timekeeper	Hours	Fees	Sum	Circle Action			
06/11/20	8119025	Prepare for and attend auction of Crown Point property (.8) discuss same with Receiver (.2) work on amendments to PSAs for winning and back up bidders and notice of results of auction (1.1) work on amended proposed order (.4) address issues re: Saska's buyer request to change buyer entity (.3) review and discuss COVID reopening orders for vacation rentals with Receiver (.3) advise Receiver on potential sale of Crown Point equipment to back-up bidder (.3)	Fates, Edward (Ted)	3.40	2,019.60	69,853.05	WO	HD	TR	_____
06/11/20	8119114	Review closing issues for Crown Point and amendments to Purchase and Sale Agreements to reflect auction results.	Lorenzen, Jonathan	0.90	469.80	70,322.85	WO	HD	TR	_____
06/11/20	8119700	Evaluate IRS Tax Lien issues regarding The Fireside By The Patio LP	Kraus, Katherine	1.00	652.50	70,975.35	WO	HD	TR	_____
06/11/20	8121000	Call related to the auction and sale process.	Zaro, David	0.20	157.50	71,132.85	WO	HD	TR	_____
06/11/20	8133855	Begin drafting the amendments to the Crown Point overbid purchase and sale agreements with RSB Property Investors and Quinn Meyers and Jacob Spitzlberger.	Thiels, Megan	2.20	712.80	71,845.65	WO	HD	TR	_____
06/12/20	8120675	Review issues related to Crown Point Purchase and Sale Agreement.	Lorenzen, Jonathan	0.20	104.40	71,950.05	WO	HD	TR	_____
06/12/20	8121185	Address issues re: amendments to purchase and sale agreements for winning bidder and back up bidder for Crown Point	Fates, Edward (Ted)	0.30	178.20	72,128.25	WO	HD	TR	_____

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Trans Date	Index	Description of Service Rendered	Timekeeper	Hours	Fees	Sum	Circle	Action	
06/12/20	8133864	Correspond with the client re: the highest bidder amendment to the Myers and Spitzberger purchase and sale agreement for the Crown Point property.	Thiels, Megan	0.80	259.20	72,387.45	WO	HD	TR
06/15/20	8121323	Review issues related to sale of Crown Point (0.6); review status of issues for Surf Rider Mission Beach (0.6).	Lorenzen, Jonathan	1.20	626.40	73,013.85	WO	HD	TR
06/15/20	8121332	Communications with Receiver and food service vendor re: settlement and payoff of lien on Saska's personal property at sale closing (.3) finalize notice of results of auction and exhibits for Crown Point sale (.4) discuss same with Receiver (.2) discuss La Mesa sale and motion for approval with Receiver (.3) initial work on motion (.6) discuss Mission Beach Surf Rider sale with Receiver (.2) discuss prospective sale of San Rafael property and approach re: J. Lance claims to property with Receiver (.4) communications with counsel for J. Lance (.3)	Fates, Edward (Ted)	2.70	1,603.80	74,617.65	WO	HD	TR
06/15/20	8121851	Review and analyze the executed High Bidder amendment to the purchase and sale amendment with Myers and Spitzberger for the Crown Point property.	Thiels, Megan	0.70	226.80	74,844.45	WO	HD	TR
06/16/20	8122309	Work on motion for approval of sale of Surf Rider La Mesa property (1.4) discuss same with Receiver (.2) discuss accounting of costs of sale for Zanzibar and Swell Coffee with Receiver (.2) address issues re:	Fates, Edward (Ted)	2.10	1,247.40	76,091.85	WO	HD	TR

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Trans Date	Index	Description of Service Rendered	Timekeeper	Hours	Fees	Sum	Circle	Action	
		reconveyance of old deed of trust on Saska's property (.3)							
06/16/20	8122514	Review financing issues for Saska's property (0.8); prepare new Purchase and Sale Agreement for Mission Beach Surf Rider (2.1).	Lorenzen, Jonathan	2.90	1,513.80	77,605.65	WO	HD	TR
06/18/20	8124636	Work on motion for approval of sale of Tennyson Street property and recovery of prior escrow deposit (1.8) discuss same with G. Rodriguez (.3) communications with counsel for J. Lance re: prospective sale of 809 San Rafael property (.2)	Fates, Edward (Ted)	2.30	1,366.20	78,971.85	WO	HD	TR
06/18/20	8124809	Complete closing documents and coordinate completion of closing items with Escrow and Buyer.	Lorenzen, Jonathan	1.10	574.20	79,546.05	WO	HD	TR
06/19/20	8125213	Discuss terms of sale of 3415 Mission Blvd. property with G. Rodriguez (.2) work on motion for approval of sale (.8) work on revisions to Tennyson sale motion (.3) communications with G. Rodriguez re: same (.2) work on Receiver declaration and proposed order for Tennyson sale motion (.7)	Fates, Edward (Ted)	2.20	1,306.80	80,852.85	WO	HD	TR
06/20/20	8126226	Revisions to Tennyson Street and Surf Rider La Mesa sale motions (.5) discuss same with Receiver (.2) work on accountings of costs for Swell Coffee, Zanzibar, and Bao Beach sales, discuss same with Receiver (.8)	Fates, Edward (Ted)	1.50	891.00	81,743.85	WO	HD	TR

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Trans Date	Index	Description of Service Rendered	Timekeeper	Hours	Fees	Sum	Circle	Action		
06/22/20	8126658	Communications with Receiver and J. Lance re: prospective sale of 809 San Rafael property (.4) work on motion for approval of 3415 Mission Blvd. sale (1.1) discuss same with Receiver and G. Rodriguez (.2) work on Receiver's declaration in support Surf Rider La Mesa sale motion (.6)	Fates, Edward (Ted)	2.30	1,366.20	83,110.05	WO	HD	TR	_____
06/22/20	8126685	Review updated terms for LaMesa Surf Rider Purchase and Sale Agreement and prepare slip pages (0.6); correspond with escrow regarding closing for Saska's (0.3).	Lorenzen, Jonathan	0.90	469.80	83,579.85	WO	HD	TR	_____
06/23/20	8128003	Discuss issues re: prospective sale of 809 San Rafael and net sale proceeds with Receiver and counsel for J. Lance (.9) revisions to motion for approval of 3415 Mission Blvd. sale (.4) work on Receiver's declaration and proposed order for motion re: sale of 3415 Mission Blvd., discuss same with Receiver (.9) discuss same with Receiver (.2) discuss sale of 737 Windemere Court property with G. Rodriguez (.4) initiwl work on sale motion (.3) advise Receiver on issues re: sale of Swell Coffee equipment (.3) advise Receiver re: response to media inquiry re: restaurant sales (.2)	Fates, Edward (Ted)	3.60	2,138.40	85,718.25	WO	HD	TR	_____
06/23/20	8128283	Revise Saska's closing issues with escrow and coordinate completion of closing documents.	Lorenzen, Jonathan	0.90	469.80	86,188.05	WO	HD	TR	_____
06/24/20	8129114	Finalize motions for approval of sale of 3415 Mission and Surf Rider La Mesa	Fates, Edward (Ted)	1.30	772.20	86,960.25	WO	HD	TR	_____

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Trans Date	Index	Description of Service Rendered	Timekeeper	Hours	Fees	Sum	Circle Action			
		properties (.4) communications with Receiver and counsel for J. Lance re: 809 San Rafael sale (.9)								
06/26/20	8131081	Coordinate completion of closing items for 3768 Mission Blvd.	Lorenzen, Jonathan	0.90	469.80	87,430.05	WO	HD	TR	_____
06/26/20	8131355	Work on sale motion for 737 Windemere Court property (1.3) discuss same with G. Rodriguez (.3) advise on issues re: federal tax lien on 3415 Mission Blvd. and service of sale motion on IRS (.2)	Fates, Edward (Ted)	1.80	1,069.20	88,499.25	WO	HD	TR	_____
06/29/20	8132504	Revisions to Windemere sale motion (.4) work on Receiver's declaration and proposed order (.7)	Fates, Edward (Ted)	1.10	653.40	89,152.65	WO	HD	TR	_____
06/29/20	8133335	Review closing documents for the sale of 3768 Mission Blvd.	Lorenzen, Jonathan	0.80	417.60	89,570.25	WO	HD	TR	_____
06/30/20	8134208	Work on Receiver declaration in support of 737 Windemere sale motion and proposed order re: same	Fates, Edward (Ted)	0.80	475.20	90,045.45	WO	HD	TR	_____
06/30/20	8134857	Review and respond to correspondence.	Lorenzen, Jonathan	0.40	208.80	90,254.25	WO	HD	TR	_____
06/30/20	8138183	Analysis of patio marketplace liquor license purchase and sale agreement.	Klinger, Warren	1.00	472.50	90,726.75	WO	HD	TR	_____

Proforma Summary

Timekeeper Number	Timekeeper	Hours	Rate	Amounts
000313	Zaro, David	0.80	787.50	630.00

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Proforma Summary

Timekeeper

Number	Timekeeper	Hours	Rate	Amounts
001665	Fates, Edward (Ted)	62.50	594.00	37,125.00
002115	Lorenzen, Jonathan	46.80	522.00	24,429.60
002244	Bell, Melissa	1.80	405.00	729.00
002283	Klinger, Warren	26.10	472.50	12,332.25
002306	Thiels, Megan	41.30	324.00	13,381.20
002348	Williams, Rebecca	4.80	301.50	1,447.20
002372	Kraus, Katherine	1.00	652.50	652.50
		185.10		\$90,726.75

Subtotal Fees

\$90,726.75

Discount

0.00

Total Fees

90,726.75

Total Disbursements

0.00

Attorney Billing Instructions

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

Billing Instructions

expires 6/30/2021: 10% off standard rates (automatic); no text editing; copies @ .10

Account Summary – As Of 12/15/20

	Fiscal YTD			Calendar YTD			LTD		
	Total	Fees	Disb.	Total	Fees	Disb.	Total	Fees	Disbursements
Worked	140,009.40	140,009.40	0.00	409,462.65	409,462.65	0.00	90,726.75	90,726.75	0.00
Unbilled Adj	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00
Billed	0.00	0.00	0.00	256,058.55	256,058.55	0.00	256,058.55	256,058.55	0.00
Collected	0.00	0.00	0.00	256,058.55	256,058.55	0.00	256,058.55	256,058.55	0.00
AR Write Off	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00
WIP	409,484.66	409,462.65	Costs						
Balance			22.01						
AR Balance	0.00	0.00	0.00						

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<i>Unalloc</i>	<i>0.00</i>
<i>Payment</i>	
<i>Client Trust</i>	<i>0.00</i>
<i>Balance</i>	

Billing Address

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

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12/15/20 17:51:04 PROFORMA STATEMENT FOR MATTER 378827.00006 (Krista Freitag, as Receiver for ANI Deve) (SEC v. Champion-Cain - Claims & Distribu)

Preliminary Billing Form

Billing Atty: 001665 - Fates, Edward
(Ted)

Matter #: 378827.00006

Client Name: Krista Freitag, as Receiver for ANI Deve

Date of Last Billing: 04/29/20

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

Proforma Number: 1066453

Client/Matter Joint Group # 378827-1

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Trans Date	Index	Description of Service Rendered	Timekeeper	Hours	Fees	Sum	Circle	Action	
04/01/20	8051479	Communications with Receiver and counsel for ANICO re: potential stipulation re: relief from PI order to pursue foreclosure (.8) respond to inquiry from W. Caldarelli re: CTC document production issues (.2)	Fates, Edward (Ted)	1.00	594.00	594.00	WO	HD	TR
04/02/20	8055406	Emails concerning the claims of Seattle Funding Group; loan issues; response to TriCorp and follow-up call with Receiver (.4).	Zaro, David	0.40	315.00	909.00	WO	HD	TR
04/03/20	8055368	Analyze and advise on issues re: SFG loans secured by University Ave. property and 301 D Street property (.3) discuss same with Receiver (.2) communications with counsel for ANICO re: joint motion re: loan secured by Hancock property (.2)	Fates, Edward (Ted)	0.70	415.80	1,324.80	WO	HD	TR
04/03/20	8056028	Emails related to SFG email, call related to the University property/loan (.3). Follow-up on the SFG loan/university property settlement with claimant, call with Receiver	Zaro, David	1.40	1,102.50	2,427.30	WO	HD	TR

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04/06/20	8056357	Call/emails with W. Caldarelli re: CTC bank records, protective order, and related issues (.8) discuss hard copy document inventory issues with Receiver (.1)	Fates, Edward (Ted)	0.90	534.60	2,961.90	WO	HD	TR
04/07/20	8057288	Communications counsel for SFG re: loan secured by University Ave. property and potential joint motion re: same (.7) advise Receiver re: same (.2)	Fates, Edward (Ted)	0.90	534.60	3,496.50	WO	HD	TR
04/08/20	8058204	Advise Receiver on issues re: SFG loan secured by University Ave. property, Symetra loan secured by Patio on Lamont property, and First Choice loan secured by 10th and J Street property (.6) analyze issues re: W. Caldarelli inquiry re: motion to expand protective order concerning bank records (.5)	Fates, Edward (Ted)	1.10	653.40	4,149.90	WO	HD	TR
04/09/20	8059451	Work on joint motion and proposed order regarding relief from stay to allow ANICO to foreclose on Hancock Street property (1.4) discuss same with Receiver (.4) address claims asserted by former outside counsel for ANI, communications re: same (.5)	Fates, Edward (Ted)	2.30	1,366.20	5,516.10	WO	HD	TR
04/10/20	8060190	Revisions to joint motion re: ANICO loan secured by Hancock Property and relief from PI Order to initiate foreclosure process (.4) discuss same with Receiver (.2) communications with counsel for ANICO re:	Fates, Edward (Ted)	1.10	653.40	6,169.50	WO	HD	TR

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		same (.2) communications with counsel for SFG re: loan secured by University Ace. property and joint motion re: relief from PI Order to initiate foreclosure (.3)							
04/13/20	8061835	Communications with counsel for Champion-Cain re: claims asserted by former outside ANI counsel in Colorado (.3) communications with Colorado attorney re: same (.2) respond to inquiry from W. Caldarelli re: bank records (.1) communications with Receiver and counsel for ANICO re: loan secured by La Mesa Surf Rider property (.2)	Fates, Edward (Ted)	0.80	475.20	6,644.70	WO	HD	TR
04/14/20	8063296	Work on joint motion re: relief from stay for SFG re: foreclosure on University Ave. property (1.4) communication with Receiver and counsel for SFG regarding same (.3) communications with Receiver and counsel for Champion-Cain re: claim of GM Financial re: automobile (.4) call with Receiver and counsel for ANICO re: loan secured by lease agreement Mesa Surf Rider property (.4) communications with counsel for ANICO re: joint motion as to Hancock property (.2)	Fates, Edward (Ted)	2.70	1,603.80	8,248.50	WO	HD	TR
04/14/20	8066151	Review draft of the motion for authority/pending cases and prepare for the meeting regarding the Chicago title case (.6). Attend conference call to develop approach to the CTC litigation, pending actions, discovery/motion (1.1).	Zaro, David	1.70	1,338.75	9,587.25	WO	HD	TR

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Trans Date	Index	Description of Service Rendered	Timekeeper	Hours	Fees	Sum	Circle Action			
04/15/20	8067165	Meet and confer communications with counsel for SEC and counsel for Champion-Cain re: joint motion concerning ANICO loan and Hancock property (.4) revisions to joint motion re: University Ave. (.5) meet and confer communications with counsel for SEC and counsel for Champion-Cain re: same (.4) communications with counsel for First Choice Bank re: SBA loan secured by equipment for Surf Rider OB, Valle Vista property and other receivership assets (.2) respond to inquiries from counsel for investors re: ANI documents (.2) further revisions to joint motion re: SFG loan on University Ave. (.4)	Fates, Edward (Ted)	2.10	1,247.40	10,834.65	WO	HD	TR	_____
04/16/20	8066231	Call/emails with counsel for Champion-Cain re: lawsuit filed by Rodman Law Group	Fates, Edward (Ted)	0.40	237.60	11,072.25	WO	HD	TR	_____
04/16/20	8067152	Emails/call with Receiver related to the D Street mechanic's lien/stop notice and extension of credit (.6). Email related to Seattle Funding Group response to D Street term sheet, follow-up call with Receiver as to SFG, development, claims options (.6).	Zaro, David	1.20	945.00	12,017.25	WO	HD	TR	_____
04/17/20	8067039	Communications with counsel for Champion-Cain in lawsuit by Rodman Law Group (.4) communications with counsel for Rodman Law Group re: dismissal of ANI (.2)	Fates, Edward (Ted)	0.60	356.40	12,373.65	WO	HD	TR	_____
04/20/20	8068411	Address direct inquiry from investor re: receivership and claims process (.2) communications with counsel for ANICO re: joint motion concerning Hancock Street	Fates, Edward (Ted)	1.10	653.40	13,027.05	WO	HD	TR	_____

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Trans Date	Index	Description of Service Rendered	Timekeeper	Hours	Fees	Sum	Circle	Action	
		property and loan secured by La Mesa Surf Rider property (.3) analyze proposed joint motion and supporting declaration prepared by M. Kirby and advise Receiver re: same (.6)							
04/20/20	8072649	Several emails with TriCorp construction counsel concerning the stop notice, lien, extension of credit.	Zaro, David	0.30	236.25	13,263.30	WO	HD	TR
04/21/20	8069617	Communications with counsel for SEC re: joint motions concerning University Ave. and Hancock Street properties (.3) communications with counsel for ANICO re: joint motion concerning Hancock Street and issues re: loan secured by La Mesa property (.3) communications with Receiver and counsel for SFG re: University Ave. property and joint motion re: same (.5)	Fates, Edward (Ted)	1.10	653.40	13,916.70	WO	HD	TR
04/21/20	8072688	Call with Receiver related to the claims regarding "D" Street project, including the TriCorp and Seattle Funding Group (.4). Follow-up on the SFG claim and the issues associated with mechanic's lien, stop notice and stay (.4).	Zaro, David	0.80	630.00	14,546.70	WO	HD	TR
04/22/20	8071144	Communications with attorney R. Houts and Receiver re: mechanic's lien on 301 D Street property	Fates, Edward (Ted)	0.20	118.80	14,665.50	WO	HD	TR
04/22/20	8072765	Several emails with counsel related to mechanic's lien issues regarding "D" Street property (.2). Call with Monitor related to "D" Street Project and related claims issues (.2). Revise draft of client email related to	Zaro, David	0.70	551.25	15,216.75	WO	HD	TR

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Trans Date	Index	Description of Service Rendered "D" Street claims and Seattle Funding Group (.3).	Timekeeper	Hours	Fees	Sum	Circle Action			
04/23/20	8072434	Communications with Receiver and SEC counsel regarding proposed joint motion from M. Kirby re: access to subpoenaed documents (.5) communications with M. Kirby re: same (.1) advise Receiver on issues relating to Symetra loan on Patio on Lamont property (.3)	Fates, Edward (Ted)	0.90	534.60	15,751.35	WO	HD	TR	_____
04/23/20	8075897	Call/emails with counsel for the Keller lien claimant concerning sale and payment issues (.3). Review emails related to the "D" Street claims (.3).	Zaro, David	0.60	472.50	16,223.85	WO	HD	TR	_____
04/24/20	8075066	Analyze mechanic's lien recorded by pre-receivership vendor and discuss response to same with Receiver (.3) initial work on letter to vendor (.1) communications with counsel for ANICO (.2)	Fates, Edward (Ted)	0.60	356.40	16,580.25	WO	HD	TR	_____
04/27/20	8075831	Call with counsel for ANICO re: loan secured by Surf Rider La Mesa property	Fates, Edward (Ted)	0.60	356.40	16,936.65	WO	HD	TR	_____
04/28/20	8076901	Analyze First Choice claim of security interest in proceeds from liquor license sale (.3) communications with counsel for First Choice re: same (.1)	Fates, Edward (Ted)	0.40	237.60	17,174.25	WO	HD	TR	_____
04/29/20	8078322	Revise letter to vendor re: litigation stay and removal of mechanic's lien	Fates, Edward (Ted)	0.20	118.80	17,293.05	WO	HD	TR	_____
04/30/20	8081464	Address issue raised by counsel for Champion-Cain re: analysis of lender claim	Fates, Edward (Ted)	0.40	237.60	17,530.65	WO	HD	TR	_____

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04/30/20	8081635	Follow-up on the S.F.G./D Street claims and coordinate the claimant's, assess competing litigation and impact upon receivership.	Zaro, David	0.60	472.50	18,003.15	WO	HD	TR
05/01/20	8083927	Communications with Receiver and counsel for Champion-Cain re: investigation in facts concerning lender claim and prior payoff (.3) respond to investor inquiry re: claims process and distributions (.2)	Fates, Edward (Ted)	0.50	297.00	18,300.15	WO	HD	TR
05/01/20	8086820	Email and call with counsel and Receiver related to the "D" Street Project and follow-up.	Zaro, David	0.30	236.25	18,536.40	WO	HD	TR
05/05/20	8086048	Communications with counsel for Champion-Cain re: state court action filed by former ANI outside counsel	Fates, Edward (Ted)	0.40	237.60	18,774.00	WO	HD	TR
05/06/20	8086946	Discuss issues with ANICO loan secured by La Mesa property with Receiver (.3) communications with counsel for ANICO re: same (.1)	Fates, Edward (Ted)	0.40	237.60	19,011.60	WO	HD	TR
05/06/20	8089240	Emails/call with the Receiver related to the "D" Street loan and mechanic's lien (.4).	Zaro, David	0.40	315.00	19,326.60	WO	HD	TR
05/07/20	8088108	Communications with former outside counsel for ANI re: dismissal of ANI from lawsuit (.3) analyze issues re: potential settlement of investor claims against CTC and effect of same on claims against receivership estate (.4) calls with counsel for CTC re: same (.6) call with SEC counsel re: same (.7) analyze issues re: contractor claim for TI work reimbursed by landlord	Fates, Edward (Ted)	2.50	1,485.00	20,811.60	WO	HD	TR

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05/07/20	8294095	Telephone conference and analysis re: potential assignment of investor claims as part of CTC settlement (.4); preparation for and participation in conference call with CTC counsel re: settlement issues (.5); telephone conference and analysis re: results of call (.3); review, analysis and exchange of e-mails re: discussion with investor counsel (.3); outlined issues for call (.4); participation in conference call with investor counsel and analysis re: same (.4).	Farrell, Michael	2.30	1,645.65	22,457.25	WO	HD	TR	
05/08/20	8089539	Discuss issues re: potential CTC settlement with W. Caldarelli investor group and impact of same of investor claims in receivership with Receiver and SEC counsel	Fates, Edward (Ted)	0.80	475.20	22,932.45	WO	HD	TR	
05/11/20	8090623	Communications with counsel for ANICO re: loan secured by La Mesa property (.1) discuss same with Receiver (.2)	Fates, Edward (Ted)	0.30	178.20	23,110.65	WO	HD	TR	
05/12/20	8091440	Anayze issues re: potential investor settlement with CTC and impact on receivership claims/distribution process and discuss same with Receiver (.7) communications with W. Caldarelli re: subpoenas issued to CTC (.2) Analyze and advise Receiver re: issues with Symetra loan secured by Lamont property (.3)	Fates, Edward (Ted)	1.20	712.80	23,823.45	WO	HD	TR	
05/12/20	8092630	Work on/analysis of the SFG email response as to the "D" Street property,	Zaro, David	0.70	551.25	24,374.70	WO	HD	TR	

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		follow-up on the Receiver response and prepare draft of same.							
05/13/20	8092711	Communications with counsel for K. Peterson	Fates, Edward (Ted)	0.10	59.40	24,434.10	WO	HD	TR _____
05/13/20	8093945	Several emails concerning the "D" Street claims, including new mechanic's lien (.2).	Zaro, David	0.20	157.50	24,591.60	WO	HD	TR _____
05/14/20	8095105	Several emails and call related to additional mechanic's liens, secured claims and Receiver responses (.3).	Zaro, David	0.30	236.25	24,827.85	WO	HD	TR _____
05/15/20	8094685	Call with SEC counsel re: impact of potential settlement between CTC and Caldarelli investors on claims of Caldarelli investors against receivership estate (.2) call with Receiver, SEC counsel, and counsel for CTC re: same (.5) discuss communications from SBA re: loan on 10th and J property with Receiver and SEC counsel (.3) communications with counsel for First Choice Bank re: same (.2)	Fates, Edward (Ted)	1.20	712.80	25,540.65	WO	HD	TR _____
05/15/20	8096438	Work on/analysis of possible settlement terms in preparation for meeting with Chicago Title Co. (.5). Attend the conference with Chicago Title, SEC, Receiver and counsel regarding settlement issues (.9). Follow-up calls with counsel and Receiver related to CTC settlement, litigation and discovery (.3).	Zaro, David	1.70	1,338.75	26,879.40	WO	HD	TR _____
05/15/20	8096442	Analysis of the emails related to lender claims, "D" Street (.3). Several calls with Receiver related to the claims issues (.2).	Zaro, David	0.80	630.00	27,509.40	WO	HD	TR _____

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		Emails to counsel and the Receiver to address claims regarding "D" Street (.3).							
05/19/20	8097367	Advise Receiver re: issues relating to SBA loan on 10th and J Street property	Fates, Edward (Ted)	0.20	118.80	27,628.20	WO	HD	TR
05/20/20	8098251	Analyze vendor UCC lien on Saska's assets and discuss same with Receiver (.5) communications with counsel for vendor (.4) advise Receiver on issues with SBA loan on 10th and J property (.2) communications with counsel for First Choice Bank re: same (.1) respond to direct inquiry from investor (.3) communications with W. Caldarelli re: potential settlement with CTC and potential impact of same of investor claims and distribution process (.9) advise Receiver re: same (.3) communications with Receiver and counsel for ANICO re: issues relating to loan secured by La Mesa property (.4)	Fates, Edward (Ted)	3.10	1,841.40	29,469.60	WO	HD	TR
05/20/20	8101251	Several emails/call with Receiver to address the lender settlement as to deed in lieu of foreclosure.	Zaro, David	0.60	472.50	29,942.10	WO	HD	TR
05/20/20	8110111	Research regarding effect of investors' good faith settlement on Receiver's claims.	Griffin, Peter	1.40	623.70	30,565.80	WO	HD	TR
05/20/20	8294113	Several emails regarding good faith settlement motion and research related to impact upon the overall Receiver strategy (.4).	Zaro, David	0.40	315.00	30,880.80	WO	HD	TR
05/21/20	8236140	Analyze issues re: potential settlement involving CTC and Caldarelli group and	Fates, Edward (Ted)	0.90	534.60	31,415.40	WO	HD	TR

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		issue re: 877 good faith settlement motion (.7) communications with W. Caldarelli re: same (.2)							
05/21/20	8236141	Communications with counsel for ANICO re: loan on La Mesa property (.3) advise Receiver re: same (.1)	Fates, Edward (Ted)	0.40	237.60	31,653.00	WO	HD	TR
05/21/20	8294122	Research/analysis of the legal issues concerning the good faith settlement motion (.9).	Zaro, David	0.90	708.75	32,361.75	WO	HD	TR
05/21/20	8294139	Continue research regarding effect of investors' good faith settlement on Receiver's claims (1.8). Draft analysis regarding same (1.4).	Griffin, Peter	3.20	1,425.60	33,787.35	WO	HD	TR
05/22/20	8236143	Analyze and advise Receiver re: Symetra security interest as to personal property at Patio on Lamont property (.4) communications with counsel for Symetra (.1) analze and advise G. Rodriguez re: IRS tax lien on 3415 Mission Blvd property (.4)	Fates, Edward (Ted)	0.90	534.60	34,321.95	WO	HD	TR
05/22/20	8236144	Communications with W. Caldarelli re: good faith settlement issues (.5)	Fates, Edward (Ted)	0.50	297.00	34,618.95	WO	HD	TR
05/22/20	8294150	Review/evaluate research related to good faith settlement motions/structure of settlement/follow-up on emails (.4).	Zaro, David	0.40	315.00	34,933.95	WO	HD	TR
05/22/20	8294199	Research and analysis regarding procedural issues for good faith settlement determination (1.7).	Griffin, Peter	1.70	757.35	35,691.30	WO	HD	TR

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05/26/20	8102703	Communications with Receiver and counsel for Symetra re: joint motion for relief to pursue non-judicial foreclosure and UCC lien on personal property (.5) communications with SEC counsel and W. Caldarelli re: potential settlement between investor group and CTC and issues relating to same (.6)	Fates, Edward (Ted)	1.10	653.40	36,344.70	WO	HD	TR
05/27/20	8104470	Communications with counsel for Symetra re: personal property and liquor license for Patio on Lamont (.4) advise Receiver re: same (.1) advise on issues re: potential settlement with SFG re: mortgage on 301 D Street property (.2) communications with counsel for food supplier re: lien issues (.2)	Fates, Edward (Ted)	0.90	534.60	36,879.30	WO	HD	TR
05/27/20	8107114	Address liens, title issues, then emails and follow-up call with Mr. Kirby concerning the deed in lieu transaction (.6). Further analysis and call with counsel related to Receiver settlement motion (.3). Emails related to contractor's claims and the City of West Sacramento (.2). Review of emails/follow-up with Receiver concerning SFG/University foreclosures, NOD/timing and call with counsel (.5).	Zaro, David	1.60	1,260.00	38,139.30	WO	HD	TR
05/28/20	8106006	Analyze issues re: food vendor claim and security interest (.4) advise Receiver re: same (.2)	Fates, Edward (Ted)	0.60	356.40	38,495.70	WO	HD	TR
05/28/20	8108091	Emails concerning West Sacramento and related matters as to settlement with the contractor claimants, City and SFG (.2). Call with Receiver related to West	Zaro, David	0.40	315.00	38,810.70	WO	HD	TR

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		Sacramento and SFG DIL settlement (.2).							
05/29/20	8109536	Follow-up on the foreclosures by SFG and the NOD's, confirm strategy (.4). Assess next steps toward settlement and motion as to "D" Street/SFG and TriCorp related claims (.5).	Zaro, David	0.90	708.75	39,519.45	WO	HD	TR
05/29/20	8109780	Communications with counsel for Symetra re: insurance and security issues for Lamont property (.4) discuss same with Receiver (.2) communications with W. Caldarelli re: Champion-Cain emails with CTC (.2)	Fates, Edward (Ted)	0.80	475.20	39,994.65	WO	HD	TR
06/01/20	8111148	Communications with counsel for Symetra re: loan secured by Lamont property and insurance issues re: same	Fates, Edward (Ted)	0.30	178.20	40,172.85	WO	HD	TR
06/02/20	8111800	Discuss issues re: potential deed in lieu of foreclosure for Lamont property with Receiver (.3) communications with counsel for Symetra re: same and joint motion for relief (.4) communications with counsel for Champion-Cain and Receiver re: EDD claim relating to Chicken Pharm restaurant (.2) communications with Jacmar and escrow company re: UCC termination (.2)	Fates, Edward (Ted)	1.10	653.40	40,826.25	WO	HD	TR
06/03/20	8112684	Revise joint motion from Symetra for relief from injunction (.6) discuss same with Receiver (.3) call with counsel for First Choice Bank re: loans secured by Bandini property and 10 & J property (.4)	Fates, Edward (Ted)	1.30	772.20	41,598.45	WO	HD	TR

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06/03/20	8115508	Follow-up on the status of the claims of lender and contractor as to "D" Street and Receiver's response (.4).	Zaro, David	0.40	315.00	41,913.45	WO	HD	TR
06/03/20	8294210	Call with W. Caldarelli re: tentative settlement with CTC and provisions relating to receivership and court approval (.4) communications with counsel for CTC (.1).	Fates, Edward (Ted)	0.50	297.00	42,210.45	WO	HD	TR
06/04/20	8113730	Communications with counsel for First Choice and counsel for SBA re: loans secured by 10th & J property (.3) communications with Receiver and counsel for Symetra re: joint motion, insurance, and property taxes for Lamont property (.7) review and revise proposed order for Symetra joint motion (.4)	Fates, Edward (Ted)	1.40	831.60	43,042.05	WO	HD	TR
06/08/20	8115951	Analyze correspondence from counsel for Edelman investors and advise Receiver re: same	Fates, Edward (Ted)	0.30	178.20	43,220.25	WO	HD	TR
06/10/20	8120983	Work on the issues related to the Seattle Funding Group and TriCrop claimants and call with Receiver(.4). Review DIL status, emails to/from counsel for SFG related to deed in lieu (.3).	Zaro, David	0.70	551.25	43,771.50	WO	HD	TR
06/10/20	8120991	Email/follow-up call with claimant as to the claims process and recovery (.3).	Zaro, David	0.30	236.25	44,007.75	WO	HD	TR
06/11/20	8119279	Address issues re: IRS lien on 3415 Mission (.3) advise Receiver re: same (.2)	Fates, Edward (Ted)	0.50	297.00	44,304.75	WO	HD	TR
06/12/20	8120296	Analyze and advise Receiver on issues with SFG loan secured by West Washington	Fates, Edward (Ted)	0.40	237.60	44,542.35	WO	HD	TR

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Trans Date	Index	Description of Service Rendered property	Timekeeper	Hours	Fees	Sum	Circle	Action	
06/12/20	8121628	Follow-up on the D Street deed in lieu and follow-up on the claims and issues attendant to mechanic's lien claims (.4).	Zaro, David	0.40	315.00	44,857.35	WO	HD	TR _____
06/12/20	8125733	Confer with C. Stelzer regarding status of receivership (.3).	Aspis, Norman	0.30	121.50	44,978.85	WO	HD	TR _____
06/15/20	8121524	Advise Receiver as to claim of finance company to Swell Coffee roasting equipment	Fates, Edward (Ted)	0.30	178.20	45,157.05	WO	HD	TR _____
06/15/20	8122489	Call with counsel for Tricorp related to the mechanic's lien/stop notice, stipulation concerning PI relief (.4).	Zaro, David	0.40	315.00	45,472.05	WO	HD	TR _____
06/16/20	8122315	Review order granting ANICO relief from injunction and advise Receiver re: same	Fates, Edward (Ted)	0.10	59.40	45,531.45	WO	HD	TR _____
06/16/20	8125462	Conferences with Receiver and TriCorp counsel concerning the ongoing disputes as to Seattle Funding Group, call as to TriCorp stay relief (.5). Call as to Axis Bank, servicing and claims issues (.3).	Zaro, David	0.80	630.00	46,161.45	WO	HD	TR _____
06/17/20	8125484	Evaluate the draft of the CTC settlement, draft stipulation, proposed revisions and email to counsel as to response (.6). Conference/email with counsel concerning CTC/Caldarelli settlement and good faith motion/stipulation (.6).	Zaro, David	1.20	945.00	47,106.45	WO	HD	TR _____
06/17/20	8138256	Analyze Chicago Title/Synapse settlement agreement and proposed joint motion (.8). Draft proposed revisions to joint motion (.5).	Griffin, Peter	1.70	757.35	47,863.80	WO	HD	TR _____

12/15/20 17:51:04 PROFORMA STATEMENT FOR MATTER 378827.00006 (Krista Freitag, as Receiver for ANI Deve) (SEC v. Champion-Cain - Claims & Distribu)

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

Trans Date	Index	Description of Service Rendered	Timekeeper	Hours	Fees	Sum	Circle	Action	
		Confer with counsel regarding same (.4).							
06/18/20	8125556	Address stipulation related to the Calderelli investor settlement and follow-up emails with counsel, advice concerning the stipulation.	Zaro, David	0.40	315.00	48,178.80	WO	HD	TR _____
06/18/20	8294230	Work on revisions to Caldarelli settlement and joint motion re: same (1.7).	Fates, Edward (Ted)	1.70	1,009.80	49,188.60	WO	HD	TR _____
06/19/20	8294241	Work on revisions to Caldarelli/CTC settlement language pertaining to receivership claims/distributions and joint motion re: same (.5) discuss same with Receiver (.3) call with W. Caldarelli and counsel for CTC re: proposed revisions to settlement agreement and joint motion (.6).	Fates, Edward (Ted)	1.40	831.60	50,020.20	WO	HD	TR _____
06/19/20	8294253	Analysis of further issues related to draft of the stipulation and settlement agreement, the good faith settlement, emails to Receiver/counsel (.7). Conference call concerning the stipulation and settlement (.8).	Zaro, David	1.50	1,181.25	51,201.45	WO	HD	TR _____
06/22/20	8126883	Communications with W. Caldarelli and counsel for CTC re: settlement agreement and joint motion re: same (.9) discuss same with Receiver (.2)	Fates, Edward (Ted)	1.10	653.40	51,854.85	WO	HD	TR _____
06/22/20	8126949	Analyze draft stipulation re: SFG loan secured by W. Washington property and relief from injunction to commence non-judicial foreclosure (.4) discuss same with Receiver (.2)	Fates, Edward (Ted)	0.60	356.40	52,211.25	WO	HD	TR _____

12/15/20 17:51:04 PROFORMA STATEMENT FOR MATTER 378827.00006 (Krista Freitag, as Receiver for ANI Deve) (SEC v. Champion-Cain - Claims & Distribu)

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

Trans Date	Index	Description of Service Rendered	Timekeeper	Hours	Fees	Sum	Circle	Action		
06/22/20	8294261	Evaluate the open issues concerning the CTC/Investor settlement, prepare for conference call with settling parties (.4). Attend conference call with CTC and investor counsel, follow-up on issues (.7). Conference with counsel related to the settlement and good faith motion/stipulation (.2).	Zaro, David	1.30	1,023.75	53,235.00	WO	HD	TR	_____
06/23/20	8127895	Communications with Receiver counsel for SBA re: loans secured by 10th and J Street property	Fates, Edward (Ted)	0.20	118.80	53,353.80	WO	HD	TR	_____
06/23/20	8294289	Discuss issues concerning Caldarelli/CTC settlement with Receiver (.3) analyze revisions to Caldarelli/CTC settlement and joint motion from counsel for CTC (.4) call/emails with W. Caldarelli and counsel for CTC re: same (.4) discuss same with Receiver (.2).	Fates, Edward (Ted)	1.30	772.20	54,126.00	WO	HD	TR	_____
06/23/20	8294294	Review further issues as to CTC/Investor settlement and good faith follow-up conference call related to the settlement (.6). Attend conference call with counsel related to joint stipulation and follow-up with counsel (.4).	Zaro, David	1.00	787.50	54,913.50	WO	HD	TR	_____
06/24/20	8131636	Emails related to the proposal concerning the investor/CTC settlement stipulation (.5).	Zaro, David	0.90	708.75	55,622.25	WO	HD	TR	_____
06/24/20	8294299	Analyze proposed revisions to Caldarelli/CTC settlement and joint motion and discuss same with Receiver (.6) emails with W. Caldarelli and counsel for CTC re: same (.3).	Fates, Edward (Ted)	0.90	534.60	56,156.85	WO	HD	TR	_____

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

Trans Date	Index	Description of Service Rendered	Timekeeper	Hours	Fees	Sum	Circle Action			
06/25/20	8129951	Analyze further issues raised by W. Caldarelli and counsel for CTC regarding Caldarelli/CTC settlement and joint motion (.6) call/emails with W. Caldarelli and counsel for CTC re: same (.8)	Fates, Edward (Ted)	1.40	831.60	56,988.45	WO	HD	TR	_____
06/25/20	8130760	Work on joint motion re: SFG loan secured by W. Washington property (.6) communications with Receiver and counsel for SFG re: same (.3)	Fates, Edward (Ted)	0.90	534.60	57,523.05	WO	HD	TR	_____
06/26/20	8131409	Communications with W. Caldarelli and counsel for CTC re: revisions to settlement agreement, joint motion, and proposed order, review of good faith settlement motion	Fates, Edward (Ted)	0.80	475.20	57,998.25	WO	HD	TR	_____
06/26/20	8131662	Email/review of the drafts and revisions to the stipulation and settlement (.5). Emails to follow-up on settlement and good faith settlement motion (.4).	Zaro, David	0.90	708.75	58,707.00	WO	HD	TR	_____
06/29/20	8294306	Emails related to the good faith settlement motion, the order and related matters (.4).	Zaro, David	0.40	315.00	59,022.00	WO	HD	TR	_____

Proforma Summary

Timekeeper				
Number	Timekeeper	Hours	Rate	Amounts
000313	Zaro, David	27.90	787.50	21,971.25
000739	Farrell, Michael	2.30	715.50	1,645.65
001665	Fates, Edward (Ted)	53.40	594.00	31,719.60
002209	Griffin, Peter	8.00	445.50	3,564.00
002369	Aspis, Norman	0.30	405.00	121.50
		91.90		\$59,022.00

12/15/20 17:51:04 PROFORMA STATEMENT FOR MATTER 378827.00006 (Krista Freitag, as Receiver for ANI Deve) (SEC v. Champion-Cain - Claims & Distribu)

Proforma Summary

Timekeeper Number	Timekeeper	Hours	Rate	Amounts
Subtotal Fees				\$59,022.00
Discount				0.00
Total Fees				59,022.00
Total Disbursements				0.00

Attorney Billing Instructions

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

Billing Instructions

expires 6/30/2021: 10% off standard rates (automatic); no text editing; copies @ .10

Account Summary – As Of 12/15/20

	Fiscal YTD			Calendar YTD			LTD		
	Total	Fees	Disb.	Total	Fees	Disb.	Total	Fees	Disbursements
Worked	44,494.65	44,494.65	0.00	183,882.15	183,882.15	0.00	59,022.00	59,022.00	0.00
Unbilled Adj	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00
Billed	0.00	0.00	0.00	107,579.25	107,579.25	0.00	107,579.25	107,579.25	0.00
Collected	0.00	0.00	0.00	107,579.25	107,579.25	0.00	107,579.25	107,579.25	0.00
AR Write Off	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00
WIP	183,882.15	183,882.15	0.00						
Balance									
AR Balance	0.00	0.00	0.00						
Unalloc	0.00								
Payment									
Client Trust	0.00								
Balance									

Billing Address

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

12/15/20 17:51:04 PROFORMA STATEMENT FOR MATTER 378827.00006 (Krista Freitag, as Receiver for ANI Deve) (SEC v. Champion-Cain - Claims & Distribu)

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

}

12/15/20 17:51:08 PROFORMA STATEMENT FOR MATTER 378827.00008 (Krista Freitag, as Receiver for ANI Deve) (SEC v. Champion-Cain - Pending Litigation)

Preliminary Billing Form

Billing Atty: 001665 - Fates, Edward
(Ted)

Matter #: 378827.00008

Client Name: Krista Freitag, as Receiver for ANI Deve

Date of Last Billing: 04/29/20

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

Proforma Number: 1066453

Client/Matter Joint Group # 378827-1

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

Trans Date	Index	Description of Service Rendered	Timekeeper	Hours	Fees	Sum	Circle	Action	
04/23/20	8072948	Communications with Receiver and local counsel in FL re: order approving engagement of local counsel and next steps	Fates, Edward (Ted)	0.30	178.20	178.20	WO	HD	TR
04/27/20	8075069	Call/emails with local counsel in FL and banking expert re: strategy and next steps for SunTrust matter (1.6) discuss same with Receiver (.2)	Fates, Edward (Ted)	1.80	1,069.20	1,247.40	WO	HD	TR
05/06/20	8086498	Communications with FL local counsel re: SunTrust matter	Fates, Edward (Ted)	0.30	178.20	1,425.60	WO	HD	TR
05/08/20	8089036	Call with FL counsel re: strategy and next steps for SunTrust litigation	Fates, Edward (Ted)	0.60	356.40	1,782.00	WO	HD	TR
05/19/20	8294104	Emails/follow-up with counsel regarding SunTrust Bank litigation.	Zaro, David	0.30	236.25	2,018.25	WO	HD	TR
06/05/20	8114531	Analyze draft motion for discovery sanctions in SunTrust matter prepared by local counsel (.4) communications with local	Fates, Edward (Ted)	1.30	772.20	2,790.45	WO	HD	TR

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

Trans Date	Index	Description of Service Rendered	Timekeeper	Hours	Fees	Sum	Circle	Action
		counsel re: same (.3) analyze proposed engagement agreement with banking expert and advise Receiver re: same (.4) respond from inquiry re: motion from counsel for investors (.2)						
06/08/20	8115855	Call/emails with local counsel in FL and banking expert re: discovery sanctions motion, deposition strategy and related issues for SunTrust case	Fates, Edward (Ted)	0.90	534.60	3,325.05	WO	HD TR

Proforma Summary

Timekeeper Number	Timekeeper	Hours	Rate	Amounts
000313	Zaro, David	0.30	787.50	236.25
001665	Fates, Edward (Ted)	5.20	594.00	3,088.80
		5.50		\$3,325.05
Subtotal Fees				\$3,325.05
Discount				0.00
Total Fees				3,325.05
Total Disbursements				0.00

Attorney Billing Instructions

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

Billing Instructions

expires 6/30/2021: 10% off standard rates (automatic); no text editing; copies @ .10

Account Summary – As Of 12/15/20

Fiscal YTD

Calendar YTD

LTD

12/15/20 17:51:08 PROFORMA STATEMENT FOR MATTER 378827.00008 (Krista Freitag, as Receiver for ANI Deve) (SEC v. Champion-Cain - Pending Litigatio)

	Total	Fees	Disb.	Total	Fees	Disb.	Total	Fees	Disbursements
Worked	6,812.55	6,812.55	0.00	21,989.25	21,989.25	0.00	3,325.05	3,325.05	0.00
Unbilled Adj	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00
Billed	0.00	0.00	0.00	13,143.15	13,143.15	0.00	13,143.15	13,143.15	0.00
Collected	0.00	0.00	0.00	13,143.15	13,143.15	0.00	13,143.15	13,143.15	0.00
AR Write Off	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00
WIP	21,989.25	21,989.25	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
