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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

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

Date: October 13, 2020
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 Second Interim Application for Payment of Fees and Reimbursement of
6 Expenses (the "Application"). This Application covers the period from January 1,
7 2020 through March 31, 2020 (the "Application Period"), and seeks approval of
8 \$542,746.80 in fees and \$9,432.53 in expenses, and an order authorizing the
9 Receiver to pay, on an interim basis, 80% of the fees incurred (\$434,197.44) and
10 100% of the expenses incurred (\$9,432.53).

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 ("Third Report") filed on June 10, 2020 (Dkt. 328), which describes in detail the Receiver's activities during the Application Period.

This Application seeks approval of \$542,746.80 in fees for a total of 985.20 hours worked, and payment on an interim basis of 80% of that amount, or \$434,197.44. Allen Matkins has agreed to discount its standard hourly rates by 10% for this case. The work performed is described task-by-task in **Exhibit A**¹ and is broken down into the following categories:

Category	Hours	Amount
General Receivership	10.70	\$6,293.70
Asset Investigation & Recovery	303.40	\$156,641.40
Reporting	14.70	\$9,757.35
Operations & Asset Sales	352.30	\$178,726.50
Claims & Distributions	125.50	\$80,365.50
Third Party Recoveries	153.50	\$96,140.70
Pending Litigation	20.10	\$11,851.65
Employment/Professional Fees	4.60	\$2,732.40
Bankruptcy Matters	0.40	\$237.60
Total Fees	\$ 985.20	\$542,746.80

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 The two largest categories of work – Asset Investigation & Recovery and
 2 Operations & Asset Sales – reflects the Receiver's continued focus on investigating,
 3 recovering, analyzing, and selling receivership assets through Court-approved sales
 4 of real and personal property. The firm has also assisted the Receiver in
 5 investigating and analyzing claims to recover sums from third parties and in
 6 obtaining documents from and producing documents to Chicago Title,
 7 investors/lenders, and other interested parties in an efficient manner. Throughout
 8 this period, Allen Matkins has worked to gain the cooperation of a myriad of third
 9 parties seeking Receivership records. Through an on-going cooperative dialogue,
 10 Allen Matkins has avoided costly and time-consuming discovery disputes.

11 Allen Matkins has worked diligently and efficiently to assist the Receiver
 12 with legal issues facing the receivership estate through the transition from a large,
 13 active enterprise to a Court-ordered receivership. The firm's work has allowed the
 14 Receiver to preserve and protect the substantial value of receivership estate assets.
 15 Because the firm has worked diligently and efficiently to assist the Receiver in
 16 carrying out her Court-ordered duties, it should be compensated on an interim basis
 17 for its work.

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

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

20 **1. General Receivership.**

21 Services in this category focus on assisting the Receiver with matters relating
 22 to the general administration of the receivership estate and the underlying litigation,
 23 including advising the Receiver on issues relating to a pre-receivership IRS audit of
 24 ANI and preparation of tax returns for the post-receivership portion of 2019, which
 25 are filed as a Qualified Settlement Fund (or "QSF"). The firm also addressed issues
 26 with the pending motion by lender ANICO to intervene in the case. The reasonable
 27 and necessary fees for Allen Matkins' work in this category total \$6,293.70.

28

2. Asset Investigation & Recovery.

The substantial services in this category relate generally to efforts to identify, secure, preserve, investigate and recover Receivership Assets. The overriding goals of this work have been to identify and marshal Receivership Assets and investigate the foundation for claims in order to recover assets and pursue claims against third parties; all in an effort to maximize the distributions to the investor victims. As can be expected during the early stage of a receivership involving allegations of a large-scale Ponzi scheme, investigation-related tasks comprised the largest category of Allen Matkins' work during the Application Period. The tasks performed include the following:

- Issuing approximately fourteen (14) subpoenas to financial institutions, lenders, recipients of potential Receivership Assets, and others involved with or otherwise connected to the Receivership Entities or Receivership Assets in some manner;
- Issuing demand and asset turnover letters to recipients believed to be in possession of Receivership Assets in order to enable the Receiver to recover and gain control over the Assets;
- Providing formal notification of the receivership to financial institutions, certain lenders, recipients of potential Receivership Assets, landlords of properties upon which the Receivership Entities operated and/or leased premises, and other persons and entities who sought to commence or pursue legal proceedings against one or more of the Receivership Entities;
- Gathering, organizing, and reviewing documents and information obtained from third parties;
- Analyzing investor loans and associated documentation; and
- Conferring with Chicago Title Company's ("CTC") counsel regarding CTC's objections to subpoenas the Receiver issued to CTC, Union

1 Bank, and City National Bank, including attending telephonic hearings
2 and preparing (along with CTC's counsel) joint motions and protective
3 orders signed by the Court.

4 Allen Matkins also assisted in the Receiver's efforts to establish a centralized
5 database or "repository" of ANI documents and information that the Receiver will
6 provide to CTC, investors/lenders, and other third parties in lieu of responding to
7 multiple subpoenas and document requests in related litigation matters. The firm
8 advised the Receiver and her staff on steps to establish the repository (including the
9 appropriate scope of hard copy documents to be scanned), options and strategies to
10 reduce costs, and met and conferred with counsel for CTC and counsel for various
11 investor/lender groups. The Receiver filed a joint motion to approve the proposed
12 repository, allocation of costs, and protective order on June 9, 2020, which was
13 approved by the Court on June 26, 2020. Dkt. 326, 355.

14 Finally, Allen Matkins assisted the Receiver in dealing with two residential
15 leases by and between a Receivership Entity, on the one hand, and a former ANI
16 employee on the other hand. The terms of both leases were inconsistent with the
17 surrounding market for residential rental properties. The reasonable and necessary
18 fees for Allen Matkins' work in this category total \$156,641.40.

19 3. Reporting.

20 Allen Matkins' services in this category focused on preparing the Receiver's
21 Second Interim Report and Recommendations, which was filed on February 7, 2020.
22 Dkt. 241. The 26-page report includes a detailed summary of the Receiver's
23 activities, funds recovered, real and personal property assets, restaurant and retail
24 operations, property taxes, insurance, debt service, loans and other investments,
25 investigation of third party claims, pending litigation, and other matters. The report
26 also details the receipts and disbursements for the receivership estate since the
27 Receiver's appointment and provides her recommendations for the continued
28

1 administration of the receivership. The reasonable and necessary fees for Allen
2 Matkins' work in this category total \$9,757.35.

3 4. Operations & Asset Sales.

4 Allen Matkins' significant work in this category reflects the volume and
5 complexity of legal issues that arose during the Application Period in connection
6 with the preservation, operation and sale of assets and the various businesses owned
7 and operated by the Receivership Entities, including but not limited to restaurants,
8 cafes, apartments, construction projects, leased properties, and other receivership
9 properties. Indeed, this was the largest category of Allen Matkins' work during the
10 Application Period. In summary, work within this category included the following:

- 11 • Drafting, negotiating, and revising confidentiality agreements, purchase
12 and sale agreements, commercial and residential leases and lease
13 amendments, and restaurant management agreements, where necessary
14 and appropriate, for various receivership businesses and properties, as
15 well as handling related title, loan, and contract issues;
- 16 • Analyzing and assisting with restaurant closures, terminations of leases
17 for retail and restaurant spaces, surrender of possession, liquor license
18 issues, UCC lien issues, and removal of personal property and other
19 fixtures upon the termination of such leases;
- 20 • Attending to issues in connection with the maintenance of existing
21 trademarks, and abandonment of certain other unused trademarks,
22 relating to the Receivership Entities' various businesses;
- 23 • Addressing issues of employment law for the Receivership Entities,
24 including employee terminations, unpaid PTO, WARN Act issues,
25 health insurance and COBRA issues, and independent contractor
26 agreements in connection with businesses operations and the wind
27 down thereof;
- 28 • Analyzing and advising on insurance coverage issues;

- 1 • Handling communications with counsel for various landlords
2 concerning leased restaurant spaces, rent obligations, personal property
3 assets, and liquor licenses;
- 4 • Advising and assisting with responses to media inquiries regarding the
5 receivership, restaurant operations, restaurant closures, and related
6 matters;
- 7 • Attending the January 24, 2020 hearing on the Brighton Court sale
8 motion, Rancho Mirage sale motion, and two personal property sale
9 motions (Patio 101 and Patio on Goldfinch).
- 10 • Preparing and revising a purchase and sale agreement for the ANI
11 membership interest in the Pullman Lofts, communicating and
12 negotiating with counsel for the proposed buyer, advising on issues
13 related to payments made by ANI to JB Resources, and attending to
14 related issues;
- 15 • Assisting with issues in connection with the termination of certain
16 service contracts associated with Receivership Entity operations;
- 17 • Assisting with closing documents for the Thomas Avenue, Rancho
18 Mirage, and Carmel property sales, and with escrow agreements and
19 related documents relating to sales of liquor licenses associated with
20 closed restaurants;
- 21 • Advising and assisting with auction/sale procedures for personal
22 property assets and liquor licenses, including the engagement of a
23 licensed auctioneer and liquor license broker;
- 24 • Assisting with issues relating to the termination and transition of
25 restaurant operations for The Patio Marketplace locations;
- 26 • Assisting with lease issues pertaining to certain tenants for residential
27 properties;
- 28

- Preparing motions, declarations, proposed orders, cost accountings, and notices regarding non-receipt of overbids (as applicable) for Court approval of sales of the following: the membership interest in Pullman Lofts, the Carmel property, the Tennyson Street property, the Swell Coffee restaurant property, the Saska's restaurant property, the parking lot property, the Bao Beach personal property/leasehold interest, and the Zanzibar property;
- Preparing proposed uniform procedures for sales of receivership estate assets; and
- Advising on issues related to COVID-19 pandemic and Safer-At-Home Orders, including required modifications to restaurant operations and notices to remaining ANI employees.

The reasonable and necessary fees for Allen Matkins' work in this category total \$178,726.50.

5. Claims & Distributions.

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

In addition, as previously discussed, CTC's violation of the Court's Appointment Order and refusal to turnover \$11.3 million for the first 75 days of the case caused a cash crisis that increased the work required by the Receiver and Allen Matkins to address the claims of lenders, landlords, and other creditors of the numerous Receivership Entities. This work, which continued into the first quarter

1 of 2020, included assisting the Receiver in trying to resolve lender claims, including
2 the avoidance of substantial default interest, late charges, attorney fees, and other
3 charges arising from the delay in payments.

4 Moreover, in response to requests made by multiple claimants and investor
5 groups, the Receiver agreed to work with the investor groups on a limited,
6 voluntary, informal sharing of ANI-related documents, along with a protective order
7 covering such documents. The Receiver, through Allen Matkins, spent significant
8 time meeting and conferring with counsel representing certain investor groups on
9 the subject of informally sharing ANI-related documents and preparing a Joint
10 Motion for approval of a proposed protective order. The Joint Motion was filed on
11 December 18, 2019. Dkt. 174.

12 Counsel for CTC then objected to the proposed sharing of ANI-related
13 documents without it also having access to the same documents. This resulted in
14 further meet and confer discussions and preparation of a Supplemental Joint Motion.
15 Dkt. 201. The Joint Motion and protective order were approved on January 22,
16 2020. Dkt. 218. The parties then sought clarification of the protective order
17 through a further Joint Motion (Dkt. 220), which was approved on February 14,
18 2020. Dkt. 249. With the protective order approved, Allen Matkins assisted the
19 Receiver in communicating with various counsel for the interested parties regarding
20 documents to be shared, sharing of production costs, gathering the documents/data
21 to be shared, and efficiently disseminating such documents/data to the interested
22 parties.

23 Allen Matkins also assisted the Receiver in gathering information and
24 analyzing claims asserted by attorney James Lance, through his entity Con & Coop
25 Beach Rentals, relating to the vacation rental properties located at 809 and 812 San
26 Rafael in Mission Beach, including handling communications with Mr. Lance and
27 his counsel. The firm also assisted in analyzing the loan documents and secured
28 claims of Bank Direct, which claims relate to loans associated with a life insurance

1 policy on Defendant Gina Champion-Cain. Allen Matkins assisted the Receiver in
 2 addressing the claims and mechanic's liens asserted by the lender, the City of West
 3 Sacramento, and various contractors, respectively, associated with the partially
 4 constructed apartment building located at 301 D Street in West Sacramento.
 5 Finally, the firm assisted in analyzing and addressing issues with various claims
 6 asserted by government agencies and former employees, including tax claims and
 7 wage claims. The reasonable and necessary fees for Allen Matkins' work in this
 8 category total \$80,365.50.

9 6. Third Party Recoveries.

10 This portion of the Application pertains to work on potential claims against
 11 third parties to recover amounts for the benefit of the receivership estate. Due to the
 12 confidential nature of the legal work on these matters and the Receiver's litigation
 13 strategy vis-à-vis third parties, the Receiver has filed a motion concurrently herewith
 14 to file this portion of the Application under seal. The reasonable and necessary fees
 15 for Allen Matkins' work in this category total \$96,140.70.

16 7. Pending Litigation.

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

26 Allen Matkins assisted the Receiver in negotiating a contingent fee
 27 engagement with the law firm in Florida representing the plaintiffs. The firm also
 28

1 assisted in preparing a motion for Court approval of the engagement, which was
2 approved by the Court on April 23, 2020. Dkt. 313.

3 Allen Matkins also assisted with issues relating to the action pending in San
4 Diego Superior Court known as *Luu v. The Patio Restaurant Grp., LLC, et al.*, San
5 Diego Super. Ct. Case No. 37-2019-00015451-CU-OE-CTL, which is a putative
6 class action filed by a former employee (which action is now stayed pursuant to the
7 litigation stay in the Appointment Order). The reasonable and necessary fees for
8 Allen Matkins' work in this category total \$11,851.65.

9 8. Employment/Professional Fees

10 Although fee applications are a necessary component of federal equity
11 receiverships, neither the Receiver nor her professionals charge for time spent
12 preparing their own detailed applications. Allen Matkins assisted in preparing the
13 Receiver's First Interim Fee Application and with meet and confer communications
14 with counsel for the Commission. The fee applications were filed on March 2, 2020
15 (Dkt. 260, 261) and approved on April 23, 2020. Dkt. 309, 312. The reasonable and
16 necessary fees for Allen Matkins' work in this category total \$2,732.40

17 9. Bankruptcy Matters.

18 Allen Matkins' time in this category pertains to the involuntary bankruptcy
19 cases filed by certain investors against Kim Peterson and Kim Funding, LLC. The
20 bankruptcy cases were dismissed on February 27, 2020. The reasonable and
21 necessary fees for Allen Matkins' work in this category total \$237.60.

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

23 Allen Matkins requests that the Court approve reimbursement of \$9,432.53 in
24 out-of-pocket costs. The itemization of such expenses is summarized below by
25 billing category. The majority of the expenses incurred relate to the issuance and
26 service of subpoenas, and the electronic storage of documents and information
27 obtained from third parties, via subpoenas or otherwise. As explained above, Allen
28 Matkins issued approximately fourteen (14) subpoenas and gathered documents

1 from many third parties and financial institutions. Each of these subpoenas required
2 proper service.

3 The total for costs incurred by Allen Matkins during the Application Period is
4 \$9,432.53 and is broken down by category as follows:

Category	Total
Messenger/FedEx Fees	\$799.49
Service of Process	\$1,806.70
Duplication	\$30.40
Filing Fees	\$345.00
Document Research	\$325.95
E-Discovery	\$5,136.75
Document Production	\$988.24
Total Fees	\$9,432.53

14 **II. THE FEES AND COSTS ARE REASONABLE AND SHOULD BE**
15 **ALLOWED.**

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

23 In allowing fees, a court should consider "the time, labor and skill required,
24 but not necessarily that actually expended, in the proper performance of the duties
25 imposed by the court upon the receiver . . . , the fair value of such time, labor and
26 skill measured by conservative business standards, the degree of activity, integrity
27 and dispatch with which the work is conducted and the result obtained." *United*
28

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

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

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

24 Allen Matkins has submitted a detailed fee application which describes the
 25 nature of the services rendered. *See* **Exhibit A**. Allen Matkins has endeavored to
 26 staff matters as efficiently as possible while remaining cognizant of the complexity
 27 of issues presented. As noted above, the request for fees is based on Allen Matkins'
 28 customary billing rates charged for comparable services provided in other matters,

1 less a 10% discount. Moreover, Allen Matkins wrote off and did not charge for
2 31.6 hours of work (\$16,329.60 in fees).

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

13 **III. CONCLUSION.**

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

- 15 1. Approving Allen Matkins' fees of \$542,746.80;
- 16 2. Authorizing and directing the Receiver to pay 80% of approved fees, or
17 \$434,197.44, from the assets of the Receivership Entities;
- 18 3. Approving Allen Matkins' costs in the amount of \$9,432.53, and
19 authorizing and directing the Receiver to reimburse such costs in full; and
- 20 4. For such other and further relief as the Court deems appropriate.

21
22 Dated: August 7, 2020

ALLEN MATKINS LECK GAMBLE
MALLORY & NATSIS LLP

23
24 By: s/Edward G. Fates

25 DAVID R. ZARO
26 EDWARD G. FATES
27 NORMAN M. ASPIS
28 Attorneys for Receiver
KRISTA FREITAG

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EXHIBIT A

EXHIBIT A

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08/05/20 20:52:42 PROFORMA STATEMENT FOR MATTER 378827.00002 (Krista Freitag, as Receiver for ANI Deve) (SEC v. Champion-Cain - General Receivers)

Preliminary Billing Form

Billing Atty: 001665 - Fates, Edward
(Ted)

Matter #: 378827.00002

Client Name: Krista Freitag, as Receiver for ANI Deve

Date of Last Billing: 04/29/20

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

Proforma Number: 1048841

Client/Matter Joint Group # 378827-1

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

Trans Date	Index	Description of Service Rendered	Timekeeper	Hours	Fees	Sum	Circle	Action	
01/07/20	27855	Communications with SEC counsel and Receiver regarding document production issues.	Fates, Edward (Ted)	0.20	118.80	118.80	WO	HD	TR
01/08/20	33129	Communications with counsel for ANICO regarding motion to intervene and deadline for reply brief (.4); review draft joint motion regarding extension of reply deadline (.1).	Fates, Edward (Ted)	0.50	297.00	415.80	WO	HD	TR
01/09/20	117863	Communications with SEC counsel regarding ANICO motion to intervene and request to extend reply deadline.	Fates, Edward (Ted)	0.10	59.40	475.20	WO	HD	TR
01/14/20	24543	Analyze issues regarding Champion-Cain request for documents related to IRS report and appeal of personal taxes owed.	Fates, Edward (Ted)	0.40	237.60	712.80	WO	HD	TR
01/15/20	65592	Email with Ted Fates re. ANI's potential liability for taxes relating to IRS adjustment made to Gina Champion-Cain's income.	Kraus, Katherine	0.30	195.75	908.55	WO	HD	TR
01/15/20	65631	Review of email concerning the ANI records, Champion-Cain audit, follow-up	Zaro, David	0.40	315.00	1,223.55	WO	HD	TR

08/05/20 20:52:42 PROFORMA STATEMENT FOR MATTER 378827.00002 (Krista Freitag, as Receiver for ANI Deve) (SEC v. Champion-Cain - General Receivers)

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

Trans Date	Index	Description of Service Rendered with counsel as to records and tax implications (.4).	Timekeeper	Hours	Fees	Sum	Circle Action			
01/16/20	52409	Email/calls/advice to Receiver re taxes/1099 issues (.3). Call/email with counsel concerning the tax issues, address QSF, pre-receivership taxes (.3).	Zaro, David	0.60	472.50	1,696.05	WO	HD	TR	_____
01/16/20	65547	Address issues regarding Champion-Cain request for documentation relating to IRS audit.	Fates, Edward (Ted)	0.30	178.20	1,874.25	WO	HD	TR	_____
01/22/20	52662	Address issues regarding Champion-Cain request for documents related to IRS audit and personal taxes, communications with Receiver regarding same.	Fates, Edward (Ted)	0.40	237.60	2,111.85	WO	HD	TR	_____
01/22/20	56437	Review Higgs Fletcher production for protected personal information; confer with counsel regarding contents of files (1.1).	Aspis, Norman	1.10	445.50	2,557.35	WO	HD	TR	_____
01/23/20	57887	Call/emails with counsel for Champion-Cain regarding documents relating to IRS audit and appeal of personal taxes, issues relating to American Express accounts, and retrieval of additional personal items (.6); communications with Receiver regarding same (.1); advise on documents regarding IRS audit (.2).	Fates, Edward (Ted)	0.90	534.60	3,091.95	WO	HD	TR	_____
01/24/20	62980	Review proposed joint motion extending ANICO deadline to file reply regarding motion to intervene (.2); communications with counsel for ANICO and counsel for SEC regarding same (.3).	Fates, Edward (Ted)	0.50	297.00	3,388.95	WO	HD	TR	_____

08/05/20 20:52:42 PROFORMA STATEMENT FOR MATTER 378827.00002 (Krista Freitag, as Receiver for ANI Deve) (SEC v. Champion-Cain - General Receivers)

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

Trans Date	Index	Description of Service Rendered	Timekeeper	Hours	Fees	Sum	Circle Action			
01/27/20	57910	Address issues regarding Champion-Cain request for tax-related documents.	Fates, Edward (Ted)	0.20	118.80	3,507.75	WO	HD	TR	_____
01/30/20	53010	Finalize review of Higgs Fletcher materials and transmit the same to counsel for Champion-Cain (.5).	Aspis, Norman	0.50	202.50	3,710.25	WO	HD	TR	_____
02/10/20	8001423	Analyze issues raised in news article concerning criminal investigation, advise Receiver regarding same.	Fates, Edward (Ted)	0.20	118.80	3,829.05	WO	HD	TR	_____
02/20/20	8009270	Analyze issues raised in ANICO reply re: motion to intervene and advise Receiver re: same	Fates, Edward (Ted)	0.30	178.20	4,007.25	WO	HD	TR	_____
02/28/20	8015870	Analyze QSF tax issues and discuss same with Receiver	Fates, Edward (Ted)	0.70	415.80	4,423.05	WO	HD	TR	_____
02/28/20	8016091	Advise on QSF tax issues for receivership.	Kraus, Katherine	0.30	195.75	4,618.80	WO	HD	TR	_____
03/02/20	8023034	Follow up communications with Receiver and counsel re: analysis of tax issues	Fates, Edward (Ted)	0.30	178.20	4,797.00	WO	HD	TR	_____
03/03/20	8025562	Call/emails with Receiver, S. Hoslett and outside tax accountant re: analysis of tax issues for receivership estate (.8) advise Receiver re: engagement of special conflicts counsel and related issues (.6)	Fates, Edward (Ted)	1.40	831.60	5,628.60	WO	HD	TR	_____
03/04/20	8026899	Advise Receiver on issues re: formation of QSF for receivership taxes	Fates, Edward (Ted)	0.30	178.20	5,806.80	WO	HD	TR	_____
03/11/20	8032955	Analyze and advise Receiver and L. Ryan on issues re: EIN set up for QSF tax returns	Fates, Edward (Ted)	0.40	237.60	6,044.40	WO	HD	TR	_____

08/05/20 20:52:42 PROFORMA STATEMENT FOR MATTER 378827.00002 (Krista Freitag, as Receiver for ANI Deve) (SEC v. Champion-Cain - General Receivers)

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

Trans Date	Index	Description of Service Rendered	Timekeeper	Hours	Fees	Sum	Circle Action			
03/11/20	8034643	TC re. tax EIN issues	Kraus, Katherine	0.20	130.50	6,174.90	WO	HD	TR	_____
03/16/20	8036722	Communications with SEC counsel re: office closure due to coronavirus and matters requiring SEC attention	Fates, Edward (Ted)	0.20	118.80	6,293.70	WO	HD	TR	_____

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

Trans Date	Index	Type	Quantity	Amt	Circle Action			
01/01/20	60305	EDISC – File Conversion - E-Discovery - - CS Disco Inc., Monthly Hosting for January 2020^75229	1.00	269.13	WO	HD	TR	_____
01/02/20	83128	MSNGR – Messenger -- Federal Express Invoice No: 689272074 2369 Ship To: Michael K Murray ^^Ship Dt: 01/02/20 Airbill: 779391117839	1.00	12.73	WO	HD	TR	_____
01/02/20	184474	MSNGR – Messenger - - Nationwide Legal, LLC, - 12/16/19 ^14360	1.00	39.25	WO	HD	TR	_____
01/02/20	195822	MSNGR – Messenger - - Nationwide Legal, LLC, DELIVER COURTESY COPY TO JUDGE - 12/27/19^203214	1.00	39.90	WO	HD	TR	_____
01/02/20	2636958	ODS – City National Bank - Document production in response to Receiver subpoena- 11/21/19	0.00	72.00	WO	HD	TR	_____
01/06/20	74905	DUP – Duplication	19.00	1.90	WO	HD	TR	_____
01/09/20	57397	MSNGR – Messenger -- Federal Express Invoice No: 690090274 2369 Ship To: Legal Dept ^^Ship Dt: 01/09/20 Airbill: 779555518215	1.00	19.69	WO	HD	TR	_____
01/13/20	57325	MSNGR – Messenger -- Federal Express Invoice No: 690090274 2369 Ship To: Nasrin Rostami ^^Ship Dt: 01/13/20 Airbill: 779639610018	1.00	13.17	WO	HD	TR	_____
01/13/20	57327	MSNGR – Messenger -- Federal Express Invoice No: 690090274 2369 Ship To: John Eric Churilla ^^Ship Dt: 01/13/20 Airbill: 779639763621	1.00	42.04	WO	HD	TR	_____

08/05/20 20:52:42 PROFORMA STATEMENT FOR MATTER 378827.00002 (Krista Freitag, as Receiver for ANI Deve) (SEC v. Champion-Cain - General Receivers)

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

Trans Date	Index	Type	Quantity	Amt	WO	HD	TR	
01/13/20	57328	MSNGR – Messenger -- Federal Express Invoice No: 690090274 2369 Ship To: James P Armstrong ^^Ship Dt: 01/13/20 Airbill: 779639567584	1.00	13.17	WO	HD	TR	_____
01/13/20	57330	MSNGR – Messenger -- Federal Express Invoice No: 690090274 2369 Ship To: Kurt Kicklighter ^^Ship Dt: 01/13/20 Airbill: 779639644358	1.00	13.17	WO	HD	TR	_____
01/13/20	57398	MSNGR – Messenger -- Federal Express Invoice No: 690090274 2369 Ship To: Suresh Menon ^^Ship Dt: 01/13/20 Airbill: 779639799840	1.00	13.17	WO	HD	TR	_____
01/13/20	57399	MSNGR – Messenger -- Federal Express Invoice No: 690090274 2369 Ship To: Sharon Daly ^^Ship Dt: 01/13/20 Airbill: 779639338608	1.00	24.70	WO	HD	TR	_____
01/13/20	57400	MSNGR – Messenger -- Federal Express Invoice No: 690090274 2369 Ship To: Mark A Beninger ^^Ship Dt: 01/13/20 Airbill: 779639396769	1.00	16.73	WO	HD	TR	_____
01/13/20	57401	MSNGR – Messenger -- Federal Express Invoice No: 690090274 2369 Ship To: Jack McCrory ^^Ship Dt: 01/13/20 Airbill: 779639440276	1.00	13.17	WO	HD	TR	_____
01/17/20	193797	ODS – Production of Documents - - Wells Fargo Summons and Subpoenas Department, Reference #22727704 Production of Records^332092	1.00	283.75	WO	HD	TR	_____
01/21/20	72965	DUP – Duplication	46.00	4.60	WO	HD	TR	_____
01/22/20	72969	DUP – Duplication	10.00	1.00	WO	HD	TR	_____
01/27/20	61547	MSNGR – Messenger -- Federal Express Invoice No: 691355490 1665 Ship To: Alexia Camarena ^^Ship Dt: 01/27/20 Airbill: 779925737008	1.00	13.31	WO	HD	TR	_____
01/27/20	61551	MSNGR – Messenger -- Federal Express Invoice No: 691355490 1665 Ship To: Stefany Twamley ^^Ship Dt: 01/27/20 Airbill: 779925715920	1.00	13.31	WO	HD	TR	_____
01/27/20	184067	MSNGR – Messenger - - Nationwide Legal, LLC, USDC/SAN DIEGO BUSINESS OFFICE, HON LARRY BURNS^204161	1.00	34.95	WO	HD	TR	_____
01/27/20	184068	MSNGR – Messenger - - Nationwide Legal, LLC, USDC, Southern District, USDC, 2 Certified copies^15022	1.00	55.50	WO	HD	TR	_____

08/05/20 20:52:42 PROFORMA STATEMENT FOR MATTER 378827.00002 (Krista Freitag, as Receiver for ANI Deve) (SEC v. Champion-Cain - General Receivers)

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

Trans Date	Index	Type	Quantity	Amt				
01/28/20	184072	POS – Service of Process - - Nationwide Legal, LLC, CHARTER COMMUNICATIONS, SUBPOENA^204161	1.00	168.85	WO	HD	TR	_____
01/28/20	184073	POS – Service of Process - - Nationwide Legal, LLC, COX COMMUNICATIONS, SUBPOENA^204161	1.00	348.75	WO	HD	TR	_____
01/29/20	183988	MSNGR – Messenger - - Nationwide Legal, LLC, USDC/SAN DIEGO, DELIVER COURTESY TO JUDGE ALLISON GODDARD^204161	1.00	55.85	WO	HD	TR	_____
01/31/20	181359	ODS – Production of Documents - - Wells Fargo Summons and Subpoenas Department, Reference #22766214 Produce of Records^332221	1.00	297.25	WO	HD	TR	_____
01/31/20	184066	POS – Service of Process - - Nationwide Legal, LLC, CHICAGO TITLE, DEPO SUBPOENA^204161	1.00	219.00	WO	HD	TR	_____
02/01/20	180778	TECH – Tech Other Service - - CS Disco Inc., Monthly Hosting for February 2020^77264	1.00	212.70	WO	HD	TR	_____
02/03/20	2643022	POS – Nationwide Legal, LLC - Obtained 5 Certified Copies, Returning Back to Client	0.00	125.00	WO	HD	TR	_____
02/04/20	2643174	FILING – First Legal, LLC - RECORDER-SAN DIEGO	0.00	345.00	WO	HD	TR	_____
02/05/20	2643178	DCSRCH – First Legal, LLC - USDC-SAN DIEGO, Order Granting Joint Ex Parte Motion to Amend Order	0.00	96.00	WO	HD	TR	_____
02/06/20	183268	MSNGR – Messenger -- Federal Express Invoice No: 692855830 1665 Ship To: Alexia Camarena ^^Ship Dt: 02/06/20 Airbill: 390212078117	1.00	13.28	WO	HD	TR	_____
02/06/20	2639895	POS – Nationwide Legal, LLC - WILLIAM A. ADAMS, SUBPOENA	0.00	197.20	WO	HD	TR	_____
02/06/20	2639896	POS – Nationwide Legal, LLC - NORTON MOORE & ADAMS, SUBPOENA	0.00	53.20	WO	HD	TR	_____
02/06/20	2639897	POS – Nationwide Legal, LLC - WILLIAM A. ADAMS APC, SUBPOENA	0.00	53.20	WO	HD	TR	_____
02/07/20	2643181	MSNGR – First Legal, LLC - USDC Southern District, Courtesy copy to Judge Burns at USDC	0.00	11.00	WO	HD	TR	_____
02/10/20	105626	DCSRCH – Document Search - - WellsOne, PACER ^10/01/2019-12/31/2019 AP CARD^4406104Q42019	1.00	10.50	WO	HD	TR	_____
02/10/20	105656	DCSRCH – Document Search - - WellsOne, PACER	1.00	1.50	WO	HD	TR	_____

08/05/20 20:52:42 PROFORMA STATEMENT FOR MATTER 378827.00002 (Krista Freitag, as Receiver for ANI Deve) (SEC v. Champion-Cain - General Receivers)

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

Trans Date	Index	Type	Quantity	Amt				
02/10/20	105780	^10/01/2019-12/31/2019 AP CARD^4406104Q42019 DCSRCH – Document Search - - WellsOne, PACER	1.00	3.20	WO	HD	TR	_____
02/10/20	105781	^10/01/2019-12/31/2019 AP CARD^4406104Q42019 DCSRCH – Document Search - - WellsOne, PACER	1.00	3.00	WO	HD	TR	_____
02/11/20	194907	^10/01/2019-12/31/2019 AP CARD^4406104Q42019 MSNGR – Messenger -- Federal Express Invoice No: 692853927 2369 Ship To: Admin Legal Dept ^^Ship Dt: 02/11/20 Airbill: 390319964833	1.00	13.00	WO	HD	TR	_____
02/11/20	194991	MSNGR – Messenger -- Federal Express Invoice No: 692853927 2369 Ship To: Jennifer Nolan ^^Ship Dt: 02/11/20 Airbill: 390319882130	1.00	13.00	WO	HD	TR	_____
02/12/20	2634542	MSNGR – Federal Express - Ship To: Karen Hagen	0.00	13.21	WO	HD	TR	_____
02/12/20	2639894	MSNGR – Nationwide Legal, LLC - USDC/SAN DIEGO - JUDGES CHAMBERS, DELIVER COURTESY	0.00	32.20	WO	HD	TR	_____
02/12/20	2642718	MSNGR – Federal Express - Ship To: Attn Office of the General C	0.00	20.44	WO	HD	TR	_____
02/12/20	2643183	DCSRCH – First Legal, LLC - USDC-SAN DIEGO, OBTAIN CERTIFIED COPY OF ORDER GRANTING MTN	0.00	103.75	WO	HD	TR	_____
02/14/20	2643185	MSNGR – First Legal, LLC - USDC Southern District, Envelope containing courtesy copy	0.00	14.00	WO	HD	TR	_____
02/19/20	2634235	MSNGR – Federal Express - Ship To: Diane Boudreau Tschetter, SASI	0.00	22.15	WO	HD	TR	_____
02/21/20	2636010	MSNGR – Nationwide Legal, LLC - USDC/SAN DIEGO - JUDGES CHAMBERS, DELIVER COURTESY	0.00	83.90	WO	HD	TR	_____
02/21/20	2643204	MSNGR – First Legal, LLC - USDC Southern District	0.00	14.00	WO	HD	TR	_____
02/27/20	2636011	POS – Nationwide Legal, LLC - WELLS FARGO BANK, SUBPOENA	0.00	185.00	WO	HD	TR	_____
02/27/20	2636012	POS – Nationwide Legal, LLC - WESTERN ALLIANCE BANK, SUBPOENA	0.00	51.00	WO	HD	TR	_____
02/27/20	2636013	POS – Nationwide Legal, LLC - MUFG UNION BANK, SUBPOENA	0.00	185.00	WO	HD	TR	_____
02/28/20	2634332	MSNGR – Federal Express - Ship To: Lori Lietzke	0.00	15.10	WO	HD	TR	_____

08/05/20 20:52:42 PROFORMA STATEMENT FOR MATTER 378827.00002 (Krista Freitag, as Receiver for ANI Deve) (SEC v. Champion-Cain - General Receivers)

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

Trans Date	Index	Type	Quantity	Amt				
03/01/20	2639486	EDISC – CS Disco Inc. - Monthly Hosting for February 2020 (13 of 29 days)	0.00	4,654.92	WO	HD	TR	_____
03/03/20	2643210	MSNGR – First Legal, LLC - USDC Southern District	0.00	14.00	WO	HD	TR	_____
03/04/20	2655438	MSNGR – First Legal Netowrk LLC - Courtesy Credit for Return Charge	0.00	(18.00)	WO	HD	TR	_____
03/06/20	2634148	ODS – City National Bank - Document Production in Response to a Subpoena	0.00	89.24	WO	HD	TR	_____
03/09/20	2634456	MSNGR – Federal Express - Ship To: Matthew C Strauss	0.00	13.02	WO	HD	TR	_____
03/09/20	2640175	MSNGR – Federal Express - Ship To: Susan Green	0.00	13.02	WO	HD	TR	_____
03/10/20	2637122	POS – Nationwide Legal, LLC - AMERICAN EXPRESS, SUBPOENA	0.00	120.75	WO	HD	TR	_____
03/11/20	2634887	BW – Duplication- Black & White Copies	182.00	18.20	WO	HD	TR	_____
03/12/20	2637123	MSNGR – Nationwide Legal, LLC - USDC/SAN DIEGO, DELIVER COURTESY	0.00	30.00	WO	HD	TR	_____
03/13/20	2636807	MSNGR – Federal Express - Ship To: Karen Hagen	0.00	13.23	WO	HD	TR	_____
03/13/20	2643218	MSNGR – First Legal, LLC - USDC Southern District	0.00	11.00	WO	HD	TR	_____
03/13/20	2643222	DCSRCH – First Legal, LLC - Dkt. 277 Order Granting Receiver's Motion	0.00	54.00	WO	HD	TR	_____
03/17/20	2636812	MSNGR – Federal Express - Ship To: Ms Cheryl Noah	0.00	13.13	WO	HD	TR	_____
03/17/20	2643224	DCSRCH – First Legal, LLC - Allen Matkins Leck Gamble Mallory, Joint FRCP 26 report	0.00	54.00	WO	HD	TR	_____
03/17/20	2643906	POS – Nationwide Legal, LLC - AMERICAN EXPRESS COMPANY, SUBPOENA	0.00	99.75	WO	HD	TR	_____
03/19/20	2635207	BW – Duplication- Black & White Copies	47.00	4.70	WO	HD	TR	_____
03/19/20	2643225	MSNGR – First Legal, LLC - USDC Southern District	0.00	11.00	WO	HD	TR	_____

08/05/20 20:52:42 PROFORMA STATEMENT FOR MATTER 378827.00002 (Krista Freitag, as Receiver for ANI Deve) (SEC v. Champion-Cain - General Receivers)

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

Trans Date	Index	Type	Quantity	Amt				
03/24/20	2645154	ODS – Wells Fargo - Production of Documents	0.00	246.00	WO	HD	TR	_____

Proforma Summary**Timekeeper**

Number	Timekeeper	Hours	Rate	Amounts
000313	Zaro, David	1.00	787.50	787.50
001665	Fates, Edward (Ted)	7.30	594.00	4,336.20
002369	Aspis, Norman	1.60	405.00	648.00
002372	Kraus, Katherine	0.80	652.50	522.00
		10.70		\$6,293.70
Subtotal Fees				\$6,293.70
Discount				0.00
Total Fees				6,293.70
Total Disbursements				9,432.53

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 08/05/20

	Fiscal YTD			Calendar YTD			LTD		
	Total	Fees	Disb.	Total	Fees	Disb.	Total	Fees	Disbursements
Worked	3,133.40	2,677.50	455.90	18,522.53	9,090.00	9,432.53	15,732.98	6,293.70	9,439.28
Unbilled Adj	0.00	0.00	0.00	0.00	0.00	0.00	0.45	0.45	0.00
Billed	0.00	0.00	0.00	57,131.21	46,721.70	10,409.51	46,721.70	46,721.70	10,409.51
Collected	0.00	0.00	0.00	57,131.21	46,721.70	10,409.51	57,131.21	46,721.70	10,409.51
AR Write Off	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00

08/05/20 20:52:42 PROFORMA STATEMENT FOR MATTER 378827.00002 (Krista Freitag, as Receiver for ANI Deve) (SEC v. Champion-Cain - General Receivers)

WIP	Total	Fees	Costs
Balance	14,728.75	9,885.60	4,843.15
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

}

08/05/20 20:52:43 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: 1048841

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	
01/01/20	52395	Analysis and exchange of e-mails re: proposed compromise from Chicago Title and strategy to address same.	Farrell, Michael	0.40	286.20	286.20	WO	HD	TR
01/02/20	52396	Drafted correspondence to receiver re: proposal to address subpoena/protective order issues and strategy for response to same (.3); various conferences, analysis and exchange of e-mails re: terms and language of response to Chicago Title and related strategy issues (.7); finalized and distributed correspondence to Chicago Title and other parties re: treatment of documents (.3); review and analysis of Union Bank subpoena and outlined differences with City National subpoena affecting scope (.3); preparation for and participation in conference call with court re: discovery dispute and analysis re: results of same (1.1); various conferences and analysis re: preparation of court order and other discovery issues (.4); reviewed	Farrell, Michael	3.50	2,504.25	2,790.45	WO	HD	TR

08/05/20 20:52:43 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	
		revised draft of joint motion re: ANI documents (.4).							
01/02/20	120672	Attention to case administration issues in connection with A. Taylor teleconference, including preparing and transmitting revised notice of subpoena (.7).	Aspis, Norman	0.70	283.50	3,073.95	WO	HD	TR
01/02/20	132739	Discuss issues regarding subpoena to Union Bank and response to counsel for Chicago Title regarding same with Receiver and counsel (.4); advise on issues regarding A. Taylor (.2); communications with counsel for Champion-Cain regarding chicagotitleescrows.com email accounts (.2); advise on issues regarding Wells Fargo account records (.3).	Fates, Edward (Ted)	1.10	653.40	3,727.35	WO	HD	TR
01/02/20	133023	Several emails/draft of response as to pending discovery disputes related to objections by CTC and proposed protective order (.6).	Zaro, David	0.60	472.50	4,199.85	WO	HD	TR
01/03/20	124236	Prepare for and participate in telephonic conference with A. Taylor and counsel, and confer with counsel regarding the same (.8).	Aspis, Norman	0.80	324.00	4,523.85	WO	HD	TR
01/03/20	132986	Call/emails with A. Taylor and counsel regarding potential receivership assets, deposition subpoena, lease, and related issues (1.1); advise Receiver regarding same (.4); call with counsel for Champion-Cain regarding Tennyson Street property and chicagotitleescrows.com (.6); advise Receiver regarding same (.2).	Fates, Edward (Ted)	2.30	1,366.20	5,890.05	WO	HD	TR

08/05/20 20:52:43 PROFORMA STATEMENT FOR MATTER 378827.00003 (Krista Freitag, as Receiver for ANI Deve) (SEC v. Champion-Cain - Asset Investigati)

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

Trans Date	Index	Description of Service Rendered	Timekeeper	Hours	Fees	Sum	Circle	Action	
01/03/20	132987	Advise on issues regarding document subpoenas and production costs (.2); call/emails with A. Taylor and counsel regarding potential receivership assets, deposition subpoena and related issues (1.1); advise Receiver regarding same (.4).	Fates, Edward (Ted)	1.70	1,009.80	6,899.85	WO	HD	TR
01/06/20	27766	Review notes regarding meet-and-confer process with Cooley regarding Chicago Title's responses to subpoena and draft meet-and-confer correspondence to C. Waidelich at Cooley regarding the same (1.6); confer with counsel and draft protective order regarding City National Bank and Union Bank records (.9).	Aspis, Norman	2.50	1,012.50	7,912.35	WO	HD	TR
01/06/20	117590	Review, analysis and exchange of e-mails with Chicago Title counsel re: preparation of draft protective order (.6); conferences and analysis re: strategy for protective order terms and scope (.4).	Farrell, Michael	1.00	715.50	8,627.85	WO	HD	TR
01/06/20	135888	Advise on issues regarding outstanding document subpoena issued to Chicago Title (.2).communications with Century Club rep regarding PGA golf tickets (.5).discuss same with Receiver (.2).communications with counsel for Champion-Cain regarding facts surrounding Tennyson Street property (.1).update Receiver regarding same (.1).	Fates, Edward (Ted)	1.10	653.40	9,281.25	WO	HD	TR
01/07/20	23042	Analysis and determination of document productions in preparation for attorney review.	Peng, Simona	0.70	204.75	9,486.00	WO	HD	TR

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01/07/20	27857	Communications with Century Club rep regarding PGA golf tickets (.2).update Receiver regarding same (.1).revisions to draft protective order regarding Union Bank documents (.2).communications with ANI former outside counsel and Receiver regarding executed lease documents (.3).discuss issues regarding Chase account and investigation into same with Receiver (.3).discuss issues with access/control of chicagotitleescrows.com domain with Receiver and G. Rodriguez (.4).	Fates, Edward (Ted)	1.50	891.00	10,377.00	WO	HD	TR	_____
01/07/20	53047	Review, analysis and revision of draft protective order and exchanged e-mails re: same (.8); analysis and exchange of e-mails with Chicago Title's counsel re: same (.3).	Farrell, Michael	1.10	787.05	11,164.05	WO	HD	TR	_____
01/07/20	8054388	Confer with counsel regarding draft protective order with Chicago Title (.2); review correspondence regarding Enom (.2).	Aspis, Norman	0.40	162.00	11,326.05	WO	HD	TR	_____
01/08/20	33156	Communications with SEC counsel and Receiver regarding document production issues (.3); advise on document preservation letter and access/control over chicagotitleescrows.com domain, revisions to same (.9); advise on issues regarding draft protective order re: Union Bank document production (.3) ;communications with Receiver regarding same (.2); advise Receiver regarding investigation into potential claims relating to Chase account	Fates, Edward (Ted)	2.20	1,306.80	12,632.85	WO	HD	TR	_____

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01/08/20	117113	Draft letter to Enom and confer with counsel regarding the same, requesting preservation of documents (1.3); draft preservation letter to Google and confer with counsel regarding the same (.9); review response to subpoena from BankDirect (.2); confer with counsel and S. Hoslett regarding subpoena to Chicago Title and review email from Chicago Title (.6); confer with counsel regarding BioMed contract (.2)	Aspis, Norman	3.20	1,296.00	13,928.85	WO	HD	TR	
01/08/20	118272	Work on issues and advice to counsel related to ongoing discovery issues re CTC subpoena, the outstanding bank subpoenas and the investor informed discovery (.4).	Zaro, David	0.40	315.00	14,243.85	WO	HD	TR	
01/08/20	121367	Review and analysis of CTC proposed changes to draft protective order and exchanged various e-mails re: same (.5); coordinated lodging of same (.3).	Farrell, Michael	0.80	572.40	14,816.25	WO	HD	TR	
01/08/20	122740	Conference with the Receiver re D Street Project, loan terms, possible loan modification (.4).	Zaro, David	0.40	315.00	15,131.25	WO	HD	TR	
01/09/20	117865	Call with Receiver and SEC counsel regarding document production questions (.2); analyze records relating to K. Peterson, discuss same with Receiver (.3).	Fates, Edward (Ted)	0.50	297.00	15,428.25	WO	HD	TR	

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01/09/20	120637	Revise preservation letter to Google and confer with counsel regarding the same (.7); review and upload documents from Riharb and confer with counsel regarding the same (.3); review correspondence from Enom and confer with counsel and K. Freitag regarding the same (.3); confer with counsel regarding W. Adams (.2).	Aspis, Norman	1.50	607.50	16,035.75	WO	HD	TR
01/09/20	121370	Conference and analysis re: Chicago Title response to subpoena and demand for protective order (.4); reviewed subpoena and pertinent authority and analysis re: need for protective order (.4).	Farrell, Michael	0.80	572.40	16,608.15	WO	HD	TR
01/10/20	65928	Meeting with counsel to address Chicago Title discovery and subpoena, advice as to dispute, legal issues and strategy.	Zaro, David	0.40	315.00	16,923.15	WO	HD	TR
01/10/20	65931	Analysis of Receiver revisions, call with Receiver and counsel re motion to sell personal property interests.	Zaro, David	0.60	472.50	17,395.65	WO	HD	TR
01/10/20	122970	Advise on issues relating to preservation letter to Google (.3); discuss same with Receiver (.2); discuss funds owed by JB Resources with Receiver (.3); calls with J. Burns regarding same (.5).	Fates, Edward (Ted)	1.30	772.20	18,167.85	WO	HD	TR
01/13/20	30498	Calls/emails with Receiver and counsel for Champion-Cain regarding chicagotitleescrows.com domain, access to email accounts, and related issues (.7); address document production issues, discuss with Receiver (.4).	Fates, Edward (Ted)	1.10	653.40	18,821.25	WO	HD	TR

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01/13/20	52402	Conference and analysis re: strategy and timing for response to Chicago Title on subpoena and protective order.	Farrell, Michael	0.40	286.20	19,107.45	WO	HD	TR
01/13/20	117672	Review, revise, and transmit several letters regarding investments made by ANI (.6).	Aspis, Norman	0.60	243.00	19,350.45	WO	HD	TR
01/14/20	24545	Communications with Receiver and G. Rodriguez regarding issues related to chicagotitleescrows.com and related email accounts and document production questions from SEC counsel (.6); communications with SEC counsel regarding document production questions (.3); discuss issues regarding A. Taylor with Receiver (.2); communications with counsel for A. Taylor regarding same (.2); communications with Receiver regarding investigation into signature stamp (.2); communications with W. Caldarelli regarding same (.1).	Fates, Edward (Ted)	1.60	950.40	20,300.85	WO	HD	TR
01/15/20	117594	Draft meet-and-confer email to Chicago Title in connection with subpoena and confer with counsel regarding the same, including case law research to support legal position (2.8); confer with D. Kirby regarding Seattle Funding Group cost issues and production; and confer with counsel regarding the same (.6); confer with B. Edmonds, counsel for Menon, regarding request for information (.4).	Aspis, Norman	3.80	1,539.00	21,839.85	WO	HD	TR
01/15/20	8168893	Call with Receiver and SEC counsel regarding data produced and contents/review of same (.4); advise on	Fates, Edward (Ted)	1.20	712.80	22,552.65	WO	HD	TR

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		issues regarding SFG document production and demands for reimbursement of costs (.4); call with counsel for Champion-Cain regarding chicagotitleescrows.com email accounts (.3); advise Receiver regarding same (.1).							
01/16/20	50797	Work on issues related to the Receiver subpoena/response of lender SFG, cost sharing as to electronic discovery (.4).	Zaro, David	0.40	315.00	22,867.65	WO	HD	TR
01/16/20	53290	Review, analysis and revision of draft correspondence to Chicago Title counsel and telephone conference re: same.	Farrell, Michael	0.70	500.85	23,368.50	WO	HD	TR
01/16/20	65549	Advise on issues relating to ANI investments and loans and information to be gathered from same.	Fates, Edward (Ted)	0.40	237.60	23,606.10	WO	HD	TR
01/16/20	121375	Confer with counsel regarding Seattle Funding Group issues and upload transmittal from Seattle Funding Group and review production (.5); confer with counsel regarding letters in connection with investments and outstanding issues in connection with subpoena to Chicago Title and revise email to Chicago Title (1.4); draft email to K. Freitag regarding Menon (.3).; review letter from Illa Designs and confer with counsel regarding the same (.4).	Aspis, Norman	2.60	1,053.00	24,659.10	WO	HD	TR
01/17/20	50823	Emails related to SFG issues/discovery and Receiver response (.4). Meeting with counsel to address outstanding discovery requests and turnover demands (.4).	Zaro, David	0.80	630.00	25,289.10	WO	HD	TR

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01/17/20	52420	Telephone conference and analysis re: revisions to draft e-mail to Chicago Title (.4); review, analysis and revision of updated response and exchanged various e-mails re: same (.3); reviewed additional versions incorporating comments and exchanged e-mails re: same (.4).	Farrell, Michael	1.10	787.05	26,076.15	WO	HD	TR	
01/17/20	53289	Multiple teleconferences and emails regarding the meet-and-confer process with Chicago Title and its production to our subpoena (3.4); review email and telephone correspondence with Endeavor Bank (.2).	Aspis, Norman	3.60	1,458.00	27,534.15	WO	HD	TR	
01/17/20	55222	Calls/emails with Receiver, S. Hoslett and counsel regarding subpoena issued to Chicago Title, objections thereto, confidentiality issues, and strategy regarding same (1.6); revisions to meet and confer communication regarding same (.4); advise on document production issues regarding SFG (.3).	Fates, Edward (Ted)	2.30	1,366.20	28,900.35	WO	HD	TR	
01/21/20	52446	Advise on next steps and timing regarding meet and confer with Chicago Title regarding outstanding document subpoena (.1); analyze issues raised in correspondence from counsel for 2Budz Holdings (.2).	Fates, Edward (Ted)	0.30	178.20	29,078.55	WO	HD	TR	
01/22/20	52642	Analyze issues raised in correspondence from counsel for Chicago Title regarding document subpoena and advise on strategy/next steps (.3); revisions to meet and confer communications regarding same (.2).	Fates, Edward (Ted)	0.50	297.00	29,375.55	WO	HD	TR	

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01/22/20	56438	Confer with counsel regarding A. Taylor lease (.2); review correspondence from Chicago Title regarding subpoena, confer with counsel regarding the same, and draft response setting forth temporary resolution (1.3).	Aspis, Norman	1.50	607.50	29,983.05	WO	HD	TR	_____
01/22/20	57842	Work with counsel related to the discovery issues/SFG joint motion, protective order issues, court order re foregoing.	Zaro, David	0.30	236.25	30,219.30	WO	HD	TR	_____
01/22/20	117598	Review and analysis of Chicago Title response re: protective order and memorandum re: same (.3); conference, analysis and exchange of e-mails re: further response to Chicago Title (.3); review and analysis of draft reply and exchanged e-mails re: same (.3).	Farrell, Michael	0.90	643.95	30,863.25	WO	HD	TR	_____
01/23/20	52436	Numerous conferences, analysis, review of draft correspondence and exchange of e-mails re: finalizing agreement with Chicago Title on protective order applicable to CTC production (.6); conferences, analysis and exchange of e-mails re: joint motion to extend deadline on discovery dispute and strategy/timing for same (.6); reviewed applicable magistrate procedures (.3); review and analysis of draft joint motion and exchanged e-mails re: potential revisions to same (.8); review, analysis and exchange of various e-mails with Chicago Title counsel and other party counsel re: joint motion issues (.4).	Farrell, Michael	2.70	1,931.85	32,795.10	WO	HD	TR	_____

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01/23/20	57770	Several emails and teleconferences with counsel for Chicago Title regarding the temporary resolution of the discovery dispute and analysis of same (2.4); draft joint motion, revise the same; transmit the same to the SEC, Chicago Title, and counsel for Ms. Champion-Cain; confer with counsel for Chicago Title regarding the same (2.0); analyze M. Spicer matter and A. Taylor issues (.3).	Aspis, Norman	4.70	1,903.50	34,698.60	WO	HD	TR
01/23/20	57889	Advise on further meet and confer communications with counsel for Chicago Title regarding outstanding document subpoena, preparation of joint motion to extend meet and confer period, and meet and confer with counsel for parties regarding same (1.1); revisions to draft joint motion regarding extension of meet and confer period regarding subpoena and document production (.6).	Fates, Edward (Ted)	1.70	1,009.80	35,708.40	WO	HD	TR
01/24/20	53031	Attention to joint motion to extend deadline to raise discovery dispute with Chicago Title before the Court (1.7); review correspondence from Chicago Title regarding its production, review production, and confer with counsel regarding the same (1.1); confer with SEC regarding Chicago Title subpoena and email regarding the same (.2).	Aspis, Norman	3.00	1,215.00	36,923.40	WO	HD	TR
01/24/20	62983	Meet and confer with SEC counsel regarding joint motion to extend meet and confer period regarding subpoena issued to Chicago Title (.2); advise on proposed order	Fates, Edward (Ted)	0.60	356.40	37,279.80	WO	HD	TR

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01/24/20	63647	Analysis and determination of document productions in preparation for attorney review.	Peng, Simona	0.30	87.75	37,367.55	WO	HD	TR
01/24/20	121378	Various conferences, analysis and exchange of e-mails re: finalizing joint motion and obtaining approval from parties (.6); analysis re: potential conversion to ex parte application (.2); reviewed court correspondence re: order on access to ANI-related documents and exchanged e-mails re: same (.3); conference and analysis re: production of documents by Chicago Title (.3).	Farrell, Michael	1.40	1,001.70	38,369.25	WO	HD	TR
01/27/20	51202	Conference with counsel related to discovery issues re investor claimants, joint motion, and Chicago escrow (.4). Call with Receiver related to the report (.2).	Zaro, David	0.60	472.50	38,841.75	WO	HD	TR
01/27/20	53026	Draft and serve subpoenas to Cox and Spectrum (.6); confer with S. Hoslett and counsel regarding Chicago Title subpoena and necessity for supplemental subpoena (.5).	Aspis, Norman	1.10	445.50	39,287.25	WO	HD	TR
01/27/20	57905	Analyze and advise on issues related to Chicago Title partial document production and potential additional accounts (.5); discuss same with Receiver and S. Hoslett (.4).	Fates, Edward (Ted)	0.90	534.60	39,821.85	WO	HD	TR

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01/28/20	121344	Draft supplemental subpoena to Chicago Title and confer with counsel regarding the same (.9); review letter from A. Taylor's counsel regarding lease and confer with counsel regarding the same (.4); transmit letter to K. Freitag (.2).	Aspis, Norman	1.50	607.50	40,429.35	WO	HD	TR	
01/28/20	136436	Discuss transfers to Charles Schwab and subpoena for documents relating to same with Receiver.	Fates, Edward (Ted)	0.20	118.80	40,548.15	WO	HD	TR	
01/29/20	52308	Reviewed correspondence and attached subpoena from counsel for Chicago Title and analysis re: potential response to same.	Farrell, Michael	0.40	286.20	40,834.35	WO	HD	TR	
01/29/20	121340	Review information from K. Freitag regarding A. Taylor (.3).	Aspis, Norman	0.30	121.50	40,955.85	WO	HD	TR	
01/29/20	132323	Analysis of the issues raised by California Opp. Lic. Fund discovery/accounting issues (.6). Follow-up on email with counsel/Receiver related to report, discovery issues, advice concerning production (.4). Work on the production issues, privilege, and advice to counsel/Receiver (.6).	Zaro, David	1.60	1,260.00	42,215.85	WO	HD	TR	
01/30/20	53012	Prepare for and participate in teleconference with C. Waidelich regarding supplemental subpoena to Chicago Title Company (.4); review letter regarding the Bella Pacific condominium association and transmit the same (.4); confer with representative from Enom regarding domain issues and confer with counsel	Aspis, Norman	1.20	486.00	42,701.85	WO	HD	TR	

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01/30/20	132101	Address issues regarding accounting of funds transferred from ANI to Champion-Cain assets (.3); communications with Receiver and SEC counsel regarding same (.2).	Fates, Edward (Ted)	0.50	297.00	42,998.85	WO	HD	TR _____
01/30/20	136976	Email/call with Receiver counsel as to ongoing dispute with third party investor counsel as to records, email as to CTC and advice to counsel (.4).	Zaro, David	0.40	315.00	43,313.85	WO	HD	TR _____
01/31/20	54035	Telephone calls, analysis and exchange of e-mails re: response to Chicago Title state court subpoena (.3); further review of subpoena scope and analysis re: potential details of global discovery solution (.4).	Farrell, Michael	0.70	500.85	43,814.70	WO	HD	TR _____
01/31/20	54090	Prepare for and participate in teleconference with Union Bank representative regarding status of production and confer with counsel regarding the same (.5); confer with C. Waidelich regarding supplemental subpoena (.1).	Aspis, Norman	0.60	243.00	44,057.70	WO	HD	TR _____
01/31/20	117081	Review title report for parking lot on Mission Blvd. and prepare revised cover sheet for recording order.	Kaup, John	0.30	87.75	44,145.45	WO	HD	TR _____
01/31/20	136871	Analysis and determination of responsive documents in preparation for attorney review.	Peng, Simona	1.00	292.50	44,437.95	WO	HD	TR _____

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01/31/20	136911	Communications with counsel for Champion-Cain regarding information as to additional ANI-related domains and issues relating to Bandini property (.3); review and discuss analysis of Bandini-related transfers with Receiver (.9); discuss investigation into potential claims and issues relating to K. Peterson/Kim Funding with Receiver (.4); analyze email communications regarding same (.5); address issues regarding production costs for Union Bank records (.2); analyze issues regarding A. Taylor, transfers to him by ANI, and approach to lease on Diamond Street property (.4); Discuss issues with recording of appointment order as to parking lot properties with G. Rodriguez (.4).	Fates, Edward (Ted)	3.20	1,900.80	46,338.75	WO	HD	TR	
02/03/20	7994132	Analysis and determination of responsive documents in preparation for attorney review and document production.	Peng, Simona	1.20	351.00	46,689.75	WO	HD	TR	
02/03/20	7994180	Analyze and advise on issues regarding Bandini property and accounting of payments regarding same (.7); discuss same with Receiver (.2); communications with SEC counsel regarding same (.2); communications with Receiver regarding payments relating to A. Taylor (.2); call with counsel for First Choice Bank and SEC counsel regarding issues relating to Bandini property, mortgage, guaranty and related issues (.4).	Fates, Edward (Ted)	1.70	1,009.80	47,699.55	WO	HD	TR	
02/03/20	7994963	Review invoice from Union Bank (.2).	Aspis, Norman	0.20	81.00	47,780.55	WO	HD	TR	

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02/03/20	8023415	Various conferences, analysis, review of materials and exchange of e-mails re: Chicago Title issues, discovery, and data production (1.5); drafted letter to M. Donohue and exchanged e-mails re: same (1.4); follow up with receiver re: Adams letter (.2)	Farrell, Michael	3.10	2,218.05	49,998.60	WO	HD	TR
02/03/20	8054416	Advise on issues regarding subpoena issued by Chicago Title and approach regarding response to same, potential protective order and document repository (.6).	Fates, Edward (Ted)	0.60	356.40	50,355.00	WO	HD	TR
02/04/20	7995426	Analysis and determination of document productions in preparation for attorney review.	Peng, Simona	0.50	146.25	50,501.25	WO	HD	TR
02/04/20	7996083	Advise on issues/approach to letter to counsel for CTC regarding subpoena, meet and confer, document repository and related issues (.3); call with counsel for Champion-Cain regarding information relating to web portal and email addresses, Bandini property, and related issues (.5); advise Receiver on web portal-related information and next steps (.4); discuss Bandini issues with Receiver and SEC counsel (.4); communications with Champion-Cain counsel regarding Bandini-related documents (.3).	Fates, Edward (Ted)	1.90	1,128.60	51,629.85	WO	HD	TR
02/04/20	7996163	Analysis of the issues related to discovery/letter response to State court subpoena issues and advice to counsel (.4).	Zaro, David	0.60	472.50	52,102.35	WO	HD	TR

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		Follow-up advice concerning approach to ANI discovery and production strategy (.2).							
02/04/20	7996552	Confer with Chicago Title's counsel regarding subpoena production issues (.3).	Aspis, Norman	0.30	121.50	52,223.85	WO	HD	TR _____
02/04/20	8023607	Review, analysis and exchange of e-mails re: draft letter to M. Donohue and potential revisions to same (.5); revised and finalized draft letter and forwarded to client for review and reviewed receiver response to same (.6); conference and analysis re: strategy to address data production issues and exchanged various e-mails re: same (.7).	Farrell, Michael	1.80	1,287.90	53,511.75	WO	HD	TR _____
02/05/20	7996622	Address/work concerning documents, subpoena, Receiver production issues, coordinate mong parties, follow-up with counsel (.6).	Zaro, David	0.60	472.50	53,984.25	WO	HD	TR _____
02/05/20	7996896	Review and analyze case law regarding cost sharing obligations in discovery in the context of federal and state law (.5).	Aspis, Norman	0.50	202.50	54,186.75	WO	HD	TR _____
02/05/20	7997280	Analyze information regarding transfer to L. Palacios and lease on Valle Vista property.	Fates, Edward (Ted)	0.20	118.80	54,305.55	WO	HD	TR _____
02/05/20	8023895	Conference and analysis re: data options and strategy (.4); conference, analysis and exchange of e-mails re: discovery obligations and cost sharing law (.3); reviewed memorandum and authorities re: same (.6); preparation for and participation in conference call with receiver re: Adams letter, Donohue letter and data production issues (.7); conference and analysis re:	Farrell, Michael	4.20	3,005.10	57,310.65	WO	HD	TR _____

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		results of call and strategy going forward (.3); revised and finalized Donohue letter and forwarded same (.4); conferences, analysis and exchange of e-mails re: Adams letter and subpoenas (.6); reviewed draft and revised subpoenas (.4); review and analysis of e-mails and attached materials re: potential discovery/data production strategy (.5).							
02/06/20	7997999	Analysis and determination of document productions in preparation for attorney review.	Peng, Simona	0.30	87.75	57,398.40	WO	HD	TR
02/06/20	7998552	Review of Order recorded in San Diego County; conference with Attorney Fates regarding potential review and inventory of records.	Kaup, John	0.20	58.50	57,456.90	WO	HD	TR
02/06/20	7998643	Email concerning CTC records and disputes related to production, advice to counsel (.4).	Zaro, David	0.40	315.00	57,771.90	WO	HD	TR
02/06/20	7998699	Advise on Union Bank document production, costs demanded therewith, strategy and next steps (.4); address issues regarding Chicago Title document production and next steps regarding meet and confer on subpoena and protective order (.2).	Fates, Edward (Ted)	0.60	356.40	58,128.30	WO	HD	TR
02/06/20	8023946	Conference and analysis re: service issues for various subpoenaed parties (.3); review and analysis of protective order (.3); review and analysis of summary of data review/storage options and analysis re:	Farrell, Michael	1.90	1,359.45	59,487.75	WO	HD	TR

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		effect on strategy (.4); drafted memorandum addressing questions on data needs (.4); review, analysis and exchange of e-mails re: indexing of hard copy files (.2); analysis re: timing of resolution and potential involvement of magistrate (.3).							
02/06/20	8025146	Review production from Chicago Title and confer with counsel regarding the same (.4); review Union Bank invoice and confer with counsel regarding the same (.3).	Aspis, Norman	0.70	283.50	59,771.25	WO	HD	TR
02/06/20	8054421	Address issues regarding paralegal support needed for hard copy document inventory (.2).	Fates, Edward (Ted)	0.20	118.80	59,890.05	WO	HD	TR
02/07/20	7999102	Advise on potential scope of document repository, format, costs, security and related issues.	Fates, Edward (Ted)	0.40	237.60	60,127.65	WO	HD	TR
02/07/20	7999250	Analysis and determination of document productions in preparation for attorney review.	Peng, Simona	0.20	58.50	60,186.15	WO	HD	TR
02/07/20	7999285	Discuss issues regarding Champion-Cain life insurance policy with Receiver (.4); communications with SEC counsel regarding same (.2); review documents/communications relating to K. Peterson (.3); discuss same with Receiver (.2).	Fates, Edward (Ted)	1.10	653.40	60,839.55	WO	HD	TR
02/07/20	7999900	Analysis of loan documents concerning the Himmelberg related loans by First Choice/PacWest/CDC, advice to the Receiver related to the loan terms and	Zaro, David	1.80	1,417.50	62,257.05	WO	HD	TR

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02/07/20	8024412	Review, analysis and exchange of e-mails re: data production issues and strategy (.3); review and analysis of receiver's report and analysis re: effect on third party claims and data production issues (.5); reviewed meet and confer correspondence and analysis re: strategy for response to same (.3).	Farrell, Michael	1.10	787.05	63,044.10	WO	HD	TR	_____
02/07/20	8025174	Confer with counsel regarding First Choice Bank loan documents and transmit the same, and review and upload Symetra loan files (.3); draft email to Union Bank representative (.1); attend to certain issues in connection with Chicago Title production of documents (.3).	Aspis, Norman	0.70	283.50	63,327.60	WO	HD	TR	_____
02/10/20	8000489	Attention to certain issues in connection with subpoena to Union Bank (.3); confer with counsel regarding issues in connection with subpoena to Chicago Title (.5); confer with counsel regarding subpoena to R. Houts (.2).	Aspis, Norman	1.00	405.00	63,732.60	WO	HD	TR	_____
02/10/20	8000518	Work with counsel concerning the documents productions/Union Bank response.	Zaro, David	0.40	315.00	64,047.60	WO	HD	TR	_____
02/10/20	8000544	Analysis and determination of client documents in preparation for attorney review.	Peng, Simona	0.20	58.50	64,106.10	WO	HD	TR	_____
02/10/20	8001401	Advise Receiver regarding investigation and document subpoena for atty R. Houts (.2); work on same (.3); advise on next steps	Fates, Edward (Ted)	0.70	415.80	64,521.90	WO	HD	TR	_____

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		regarding Union Bank document production issues (.2).								
02/10/20	8022442	Review, analysis and exchange of various e-mails re: strategy and timing for meet and confer call (.4); telephone call re: Adams subpoena and analysis re: same (.3); outlined issues to be addressed in Chicago Title call (.4); conferences and analysis re: Union Bank invoice and strategy to address same (.3).	Farrell, Michael	1.40	1,001.70	65,523.60	WO	HD	TR	_____
02/10/20	8054436	Analyze and advise on strategy/next steps for document production/repository issues (.2).	Fates, Edward (Ted)	0.20	118.80	65,642.40	WO	HD	TR	_____
02/11/20	8001541	Address document production and meet and confer issues re: Chicago Title (.4) advise on issues re: ANI gift to USD, discuss same with Receiver (.3) meet and confer call with counsel for SEC and counsel for Chicago Title re: document management issues, potential Chicago Title settlements with investors, Chicago Title request for stay, and related issues (.7) discuss issues relating to Bandini property and payments with counsel for Champion-Cain (.2) discuss same with Receiver (.1)	Fates, Edward (Ted)	1.70	1,009.80	66,652.20	WO	HD	TR	_____
02/11/20	8002730	Confer with Union Bank representative regarding cost issues in connection with Union Bank's production to Receiver's subpoena (.6); confer with counsel regarding subpoena to Chicago Title and Chicago Title's corresponding production (.2); draft and transmit letter to Continental	Aspis, Norman	1.40	567.00	67,219.20	WO	HD	TR	_____

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		Recovery Services (.6).							
02/11/20	8022429	Conference, analysis and exchange of e-mails re: subpoena production/protective order issues with Chicago Title (.4); conference and analysis re: data production issues and strategy in advance of call (.4); telephone conference and analysis re: issues to be addressed on call (.3); preparation for and participation in conference call with SEC and Chicago Title re: data and settlement issues (.8).	Farrell, Michael	1.90	1,359.45	68,578.65	WO	HD	TR
02/12/20	8003034	Analysis and determination of document productions in preparation for attorney review.	Peng, Simona	0.30	87.75	68,666.40	WO	HD	TR
02/12/20	8003191	Confer with counsel and Union Bank representative regarding cost issues in connection with production in response to subpoena (.3).	Aspis, Norman	0.30	121.50	68,787.90	WO	HD	TR
02/12/20	8003193	Draft letter to transfer receipient and confer with counsel regarding the same (.7); draft and transmit subpoenas to Cox and Spectrum (.6); draft subpoena to R. Houts and email, and confer with counsel regarding the same (.7); review Chicago Title production and confer with counsel regarding the same (.5).	Aspis, Norman	2.50	1,012.50	69,800.40	WO	HD	TR
02/12/20	8003373	Review and respond to emails and conference with Attorney Fates regarding review and inventory of boxes at ANI.	Kaup, John	0.50	146.25	69,946.65	WO	HD	TR

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02/12/20	8003417	Revisions to letter to receipient of transfer from ANI (.4) advise on issues and next steps re: Union Bank production and associated costs (.4) discuss same with Receiver (.2) advise Receiver and G. Rodriguez on issues re: life insurance policy (.3) confer with SEC counsel re: same (.2) advise Receiver on issues re: inventory of hard copy documents and timing/approach re: same (.6) address issues re: Chicago Title document production per subpoena (.2)	Fates, Edward (Ted)	2.30	1,366.20	71,312.85	WO	HD	TR	
02/12/20	8022421	Review, analysis and exchange of e-mails re: scope of hard copy document universe (.2); conference and analysis re: effect of same on data approach (.3); conferences, analysis and review of materials re: Chicago Title positions, potential settlements, and receiver strategy (.7).	Farrell, Michael	1.20	858.60	72,171.45	WO	HD	TR	
02/13/20	8004216	Review of general inventory of boxes and review boxes on site.	Kaup, John	3.00	877.50	73,048.95	WO	HD	TR	
02/13/20	8004526	Advise on approach and next steps re: ANI hard copy document inventory (.2) assess status of Chicago Title document production and timing/issues for further productions (.2)	Fates, Edward (Ted)	0.40	237.60	73,286.55	WO	HD	TR	
02/13/20	8004913	Analysis and determination of responsive documents in preparation for attorney review and document production.	Peng, Simona	0.50	146.25	73,432.80	WO	HD	TR	
02/13/20	8004916	Call re discovery, follow-up on emails concerning the production of records and	Zaro, David	0.30	236.25	73,669.05	WO	HD	TR	

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02/13/20	8005013	Multiple conferences with counsel and Union Bank representative regarding cost issues in connection with responding to subpoena (.6).	Aspis, Norman	0.60	243.00	73,912.05	WO	HD	TR	_____
02/13/20	8005014	Confer with counsel for Chicago Title and internal counsel regarding status of production in connection with subpoena (.5).	Aspis, Norman	0.50	202.50	74,114.55	WO	HD	TR	_____
02/13/20	8022415	Conference and analysis re: data production issues and strategy (.4); conference, analysis and review of materials re: malpractice issues and claim investigation strategy (.4).	Farrell, Michael	0.80	572.40	74,686.95	WO	HD	TR	_____
02/14/20	8005162	Communications with SEC counsel re: issues regarding Champion-Cain life insurance policy (.2) advise Receiver on legal issues and strategy for accounting/analysis of Bandini-related transfers (.4)	Fates, Edward (Ted)	0.60	356.40	75,043.35	WO	HD	TR	_____
02/14/20	8005531	Analysis and determination of responsive documents in preparation for attorney review and document production.	Peng, Simona	0.50	146.25	75,189.60	WO	HD	TR	_____
02/14/20	8005842	Analyze and advise on strategy and next steps re: ANI document repository and associated costs	Fates, Edward (Ted)	0.40	237.60	75,427.20	WO	HD	TR	_____
02/14/20	8022412	Conferences, analysis and exchange of e-mails re; Chicago Title issues, request for stay, and overall strategy (.7); review,	Farrell, Michael	1.10	787.05	76,214.25	WO	HD	TR	_____

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		analysis and exchange of e-mails re: discussions with vendors and timing of database creation (.4).							
02/18/20	8007380	Conference with Attorney Fates and telephone conference regarding review of boxes and preparation of inventory.	Kaup, John	0.20	58.50	76,272.75	WO	HD	TR
02/18/20	8007417	Analysis and determination of responsive documents in preparation for attorney review and document production.	Peng, Simona	2.20	643.50	76,916.25	WO	HD	TR
02/18/20	8007551	Analyze and advise Receiver on request for note amendment from BayMedica (.3) conference call with CTC counsel and SEC counsel re: CTC subpoena, document repository, CTC request for stay, and related issues (.7) advise Receiver re: same (.1) address strategy and next steps re: repository (.2) address issues re: Union Bank document production (.2) advise on hard copy document inventory issues and approach/timing (.2)	Fates, Edward (Ted)	1.70	1,009.80	77,926.05	WO	HD	TR
02/18/20	8007638	Correspond with T. Fates and Union Bank representative regarding transmittal of responsive documents to subpoena (.2).	Aspis, Norman	0.20	81.00	78,007.05	WO	HD	TR
02/18/20	8007702	Preparation for and participation in conference call with SEC and Chicago Title re: data production issues (.9); telephone conference and analysis re: results of call and next steps (.3).	Farrell, Michael	1.20	858.60	78,865.65	WO	HD	TR
02/19/20	8007797	Conference and analysis re: Chicago Title data production issues (.4).	Farrell, Michael	0.40	286.20	79,151.85	WO	HD	TR

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02/19/20	8007915	Analyze and advise Receiver re: investigation into restricted mail/PO Box issue (.3) communications with counsel for Chapion-Cain re: same (.2) discuss status/timing on analysis of Bandini-related transfers with Receiver (.2)	Fates, Edward (Ted)	0.70	415.80	79,567.65	WO	HD	TR	_____
02/19/20	8008066	Analysis and determination of responsive documents in preparation for attorney review and document production.	Peng, Simona	3.30	965.25	80,532.90	WO	HD	TR	_____
02/19/20	8008504	Email correspondence and telephone conference with Ms. Gallagher regarding review of boxes at ANI offices; review of notes regarding boxes and telephone conference with Ms. Hughes.	Kaup, John	0.80	234.00	80,766.90	WO	HD	TR	_____
02/20/20	8009097	Review of documents at ANI offices; follow-up on cataloging and indexing of boxes.	Kaup, John	1.60	468.00	81,234.90	WO	HD	TR	_____
02/20/20	8009750	Communications with counsel for Champion-Cain re: PO Box for Adams Network and Chicago Escrows and T, Bandini-related transfers, and related issues (.3) review documents provided (.2) discuss same with Receiver (.1)	Fates, Edward (Ted)	0.60	356.40	81,591.30	WO	HD	TR	_____
02/20/20	8009986	Analysis and determination of responsive documents in preparation for attorney review and production.	Peng, Simona	0.80	234.00	81,825.30	WO	HD	TR	_____
02/20/20	8022651	Prepare for document review and meeting at ANI.	Gallaher, Georgia	0.40	117.00	81,942.30	WO	HD	TR	_____

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02/21/20	8010161	Analysis and determination of responsive document in preparation for attorney review and production.	Peng, Simona	1.80	526.50	82,468.80	WO	HD	TR	_____
02/21/20	8010909	Review of boxes onsite for indexing.	Kaup, John	2.00	585.00	83,053.80	WO	HD	TR	_____
02/21/20	8011052	Discuss investigation into Bandini-related transfers with Receiver and counsel for SEC (.4) discuss analysis of A. Taylor issues with Receiver (.2) communications with counsel for Champion-Cain re: same (.2)	Fates, Edward (Ted)	0.80	475.20	83,529.00	WO	HD	TR	_____
02/21/20	8022527	Review and index documents at ANI Development regarding asset investigation.	Gallaher, Georgia	9.50	2,778.75	86,307.75	WO	HD	TR	_____
02/24/20	8011615	Advise on response to counsel for R. Houts re: subpoena production issues, revise correspondence re: same (.3) communications with Receiver and counsel for CTC re: meet and confer on document subpoena (.2) advise on next steps re: CTC meet and confer re: document production and protective order and Union Bank document production (.2)	Fates, Edward (Ted)	0.70	415.80	86,723.55	WO	HD	TR	_____
02/24/20	8011695	Several emails, assess brief from class counsel as to documents/opt-out (.2).	Zaro, David	0.20	157.50	86,881.05	WO	HD	TR	_____
02/24/20	8011700	Email/analysis of issues and call with Receiver re West Sacramento/D Street project, negotiation of a transaction, strategy (.3).	Zaro, David	0.30	236.25	87,117.30	WO	HD	TR	_____

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02/24/20	8012060	Review case law regarding cost burden in productions and draft email to R. Houts' attorney regarding the same, and confer with counsel regarding the same (.4); correspond with Cox/Spectrum representative regarding subpoena (.2); confer with counsel regarding issues in connection with document sharing and Chicago Title's production and review correspondence regarding the same (.5); confer with L. Ryan and K. Freitag regarding Wells Fargo and Union Bank (.2).	Aspis, Norman	1.30	526.50	87,643.80	WO	HD	TR	_____
02/24/20	8012449	Review, analysis and exchange of e-mails with Chicago Title and counsel re: conference call (.2);.	Farrell, Michael	0.20	143.10	87,786.90	WO	HD	TR	_____
02/24/20	8012499	Analysis and determination of responsive documents in preparation for attorney review and production.	Peng, Simona	0.50	146.25	87,933.15	WO	HD	TR	_____
02/25/20	8013252	Communications with SEC counsel, counsel for Champion-Cain, counsel for S. Cain, and counsel for First Choice Bank re: issues related to Bandini property (.2) communications with Receiver and EDD re: payroll tax refund (.4)	Fates, Edward (Ted)	0.60	356.40	88,289.55	WO	HD	TR	_____
02/25/20	8013325	Confer with Union Bank representative regarding transmittal of records (.2).	Aspis, Norman	0.20	81.00	88,370.55	WO	HD	TR	_____
02/26/20	8013744	Conference call with SEC counsel and Chicago Title counsel re: scope and timing of document repository and related issues (.5) advise on next steps re: document analysis for repository (.4) discuss facts	Fates, Edward (Ted)	1.80	1,069.20	89,439.75	WO	HD	TR	_____

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		concerning A. Taylor with counsel for Champion-Cain (.3) update Receiver re: same (.1) discuss document subpoenas for K. Peterson-related accounts with Receiver (.3) discuss accounting issues re: Bandini property with Receiver (.2)								
02/26/20	8013932	Follow-up with Attorney Fates and G. Gallaher regarding inventory of boxes at ANI offices.	Kaup, John	0.20	58.50	89,498.25	WO	HD	TR	_____
02/26/20	8014636	Review and analysis of memorandum re: interviews with data storage/review vendors and analysis re: effect on call with Chicago Title (.2); preparation for and participation in conference call with SEC and Chicago Title re: data production and other issues and analysis re: impact of same (1.1); conferences and analysis re: results of call and strategy going forward on data issues (.5).	Farrell, Michael	1.80	1,287.90	90,786.15	WO	HD	TR	_____
02/26/20	8014662	Confer with Wells Fargo representative and confer with L. Ryan regarding the banks ability to produce records prior to November 2012 (.3).	Aspis, Norman	0.30	121.50	90,907.65	WO	HD	TR	_____
02/26/20	8014703	Analysis and determination of document productions in preparation for attorney review.	Peng, Simona	0.50	146.25	91,053.90	WO	HD	TR	_____
02/27/20	8015391	Communications with Receiver and G. Rodriguez re: email accounts relating to Adams Law Network and next steps re: same (.5) communications with counsel for Champion-Cain re: same (.2) revise	Fates, Edward (Ted)	2.20	1,306.80	92,360.70	WO	HD	TR	_____

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		subpoenas to multiple banks for account records (.4) discuss issues re: subpoena document productions with L. Ryan (.2) call with SEC counsel, Champion-Cain counsel, S. Cain counsel, and First Choice Bank counsel re: Bandini property, accounting of transfers, and related issues (.7) update Receiver re: same (.2)							
02/27/20	8015472	Telephone conference with G. Gallagher regarding status of review of boxes at ANI.	Kaup, John	0.20	58.50	92,419.20	WO	HD	TR
02/27/20	8015746	Draft subpoena to Union Bank, Wells Fargo, and Western Alliance Bank and transmit for service (1.1); confer with Union Bank representative regarding production of records (.2); draft letter to terminate lease and confer with counsel regarding the same (.8); confer internally regarding Union Bank production (.3); confer with C. Waidelich regarding meet-and-confer on Chicago Title's production (.2); review correspondence from S. Metzger regarding subpoena to R. Houts (.1).	Aspis, Norman	2.70	1,093.50	93,512.70	WO	HD	TR
02/28/20	8015791	Follow up communications with counsel for S. Cain re: accounting of Bandini-related transfers (.2) discuss timing/approach to inventory of hard copy documents with Receiver (.3) discuss investigation into A. Taylor lease issues with Receiver (.2) advise on next steps re: analysis of Chicago Title document productions and compliance with subpoena (.4)	Fates, Edward (Ted)	1.10	653.40	94,166.10	WO	HD	TR

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02/28/20	8015913	Confer with counsel for Chicago Title regarding production and confer with counsel regarding the same (.7); draft letter to mechanics' lien filer and confer with counsel regarding the same (.5); confer with Cox representative regarding subpoena (.4).	Aspis, Norman	1.60	648.00	94,814.10	WO	HD	TR	_____
02/28/20	8024051	Follow-up on review and inventory of boxes at ANI offices.	Kaup, John	0.40	117.00	94,931.10	WO	HD	TR	_____
03/02/20	8024427	Call with counsel for Champion-Cain re: A. Taylor rent payments and domain/emails relating to Adams Network (.6) advise Receiver re: same (.2)	Fates, Edward (Ted)	0.80	475.20	95,406.30	WO	HD	TR	_____
03/02/20	8031542	Confer with counsel regarding Chicago Title production and review the same (.5).	Aspis, Norman	0.50	202.50	95,608.80	WO	HD	TR	_____
03/02/20	8052908	Conference and analysis re: open issues with Chicago Title documents and strategy to address same.	Farrell, Michael	0.50	357.75	95,966.55	WO	HD	TR	_____
03/03/20	8025574	Address issues with Chicago Title document production and analysis, discuss same with counsel (.7) communications with W. Caldarelli re: possible subpoena for phone records (.2) discuss same with Receiver (.2) advise on follow up/next steps re: subpoenas to internet service providers (.2) discuss same with Receiver (.1)	Fates, Edward (Ted)	1.40	831.60	96,798.15	WO	HD	TR	_____
03/03/20	8027037	Follow-up on review and inventory of boxes at ANI offices.	Kaup, John	0.40	117.00	96,915.15	WO	HD	TR	_____

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03/03/20	8031384	Confer with counsel regarding Chicago Title production and coordinate transmittal of records and review sample records provided by C. Waidelech (1); confer with S. Metzger and counsel regarding R. Houts subpoena (.3).	Aspis, Norman	1.30	526.50	97,441.65	WO	HD	TR
03/03/20	8041236	Analysis and determination of document productions in preparation for attorney review.	Peng, Simona	0.10	29.25	97,470.90	WO	HD	TR
03/03/20	8048787	Conference call with Attys. Fates and Aspis re. Chicago Title document review.	Williams, Rebecca	0.20	60.30	97,531.20	WO	HD	TR
03/03/20	8052987	Conference and analysis re: Chicago Title meet and confer issues and strategy.	Farrell, Michael	0.40	286.20	97,817.40	WO	HD	TR
03/04/20	8026940	Communications with Receiver and counsel for CalPrivate Bank re: document subpoena for account records (.2) advise on issues/next steps re: Union Bank document production (.2)	Fates, Edward (Ted)	0.40	237.60	98,055.00	WO	HD	TR
03/04/20	8028025	Follow-up on inventory of boxes at ANI offices; review and respond to emails with Ms. Hughes.	Kaup, John	0.30	87.75	98,142.75	WO	HD	TR
03/04/20	8031352	Draft email to Charter representative regarding outstanding subpoena and confer with counsel regarding the same (.3).	Aspis, Norman	0.30	121.50	98,264.25	WO	HD	TR
03/05/20	8027872	Advise on next steps re: inventory of ANI documents for production/repository (.3) discuss same with Receiver (.2) calls with Receiver and counsel for Champion-Cain re: text messages and efforts to recover	Fates, Edward (Ted)	1.50	891.00	99,155.25	WO	HD	TR

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		same (.3) advise Receiver on approach and issues for forensic accounting and scope/verification (.3) call with SEC counsel re: issues relating to life insurance policy (.2) discuss same with Receiver (.2)							
03/05/20	8029138	Follow-up with counsel on the outstanding bank subpoenas, the dispute as to production of records (.4).	Zaro, David	0.40	315.00	99,470.25	WO	HD	TR
03/05/20	8029617	Update Attorney Fates regarding boxes at ANI offices; review and tag additional boxes at ANI.	Kaup, John	4.30	1,257.75	100,728.00	WO	HD	TR
03/05/20	8030018	Follow up via email on subpoenas to Charter and Cox (.3).	Aspis, Norman	0.30	121.50	100,849.50	WO	HD	TR
03/06/20	8028916	Advise on Cox and Charter subpoenas/productions and next steps re: same (.3) communications with counsel for Champion-Cain re: information pertaining to text messages (.2) address issues re: Union Bank production (.1) analyze and advise on issues re: Chicago Title document production, redactions, protective order, meet and confer deadlines and related issues (.9) analyze issues re: Champion-Cain life insurance policy, discuss same with Receiver (.4)	Fates, Edward (Ted)	1.90	1,128.60	101,978.10	WO	HD	TR
03/06/20	8030043	Attention to issues in connection with subpoenas to Charter and Cox (.5); prepare for and participate in meet and confer with counsel for Chicago Title and confer with counsel regarding the same (2); confer with representative from Union Bank and	Aspis, Norman	2.90	1,174.50	103,152.60	WO	HD	TR

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		counsel regarding records produced in response to subpoena and transmit the same to S. Hoslett (.4).							
03/06/20	8034041	Work with document productions and review and respond to emails.	Kaup, John	1.30	380.25	103,532.85	WO	HD	TR
03/06/20	8053272	Conference and analysis re: Chicago Title document production issues and potential meet and confer conference (.3); reviewed pertinent documents (.2); conference call and analysis re: Chicago Title redactions, compliance with subpoena discussions, and potential meet and confer re: amended production and protective order (.5); reviewed prior protective order communications (.3).	Farrell, Michael	1.30	930.15	104,463.00	WO	HD	TR
03/08/20	8048789	Review Chicago Title documents for documents responsive to all subpoena categories.	Williams, Rebecca	2.00	603.00	105,066.00	WO	HD	TR
03/09/20	8030150	Discuss document subpoena to American Express with Receiver (.2) advise on Union Bank document production issues (.1) analyze issues and next steps re: Chicago Title document production, redactions and meet and confer process re: same (.6) revisions to Joint Motion and proposed order re: same (.4) advise Receiver re: same (.2) communications with counsel for CalPrivate Bank re: subpoena for records (.2) analyze and advise Receiver re: asset investigations and pricing (.4)	Fates, Edward (Ted)	2.10	1,247.40	106,313.40	WO	HD	TR

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03/09/20	8034113	Review and respond to emails regarding document productions.	Kaup, John	0.30	87.75	106,401.15	WO	HD	TR
03/09/20	8041252	Analysis and determination of document productions in preparation for attorney review.	Peng, Simona	0.10	29.25	106,430.40	WO	HD	TR
03/09/20	8048788	Review Chicago Title documents to ensure documents are included from all subpoena categories; phone call with Atty. Aspis to summarize findings.	Williams, Rebecca	1.20	361.80	106,792.20	WO	HD	TR
03/09/20	8053394	Telephone conference and analysis re: Chicago Title document production, protective order, extension stipulation and meet and confer issues and strategy (.6); reviewed e-mail and attachments re; prior protective order and related documents (.3); review and analysis of draft stipulation and order and exchanged various e-mails re: same (.5).	Farrell, Michael	1.40	1,001.70	107,793.90	WO	HD	TR
03/09/20	8053602	Attention to issues in connection with subpoena to Charter Communications (.3); confer with S. Peng and and counsel regarding production of ANI-related documents and transmit the same (.4); finalize and transmit letter to M. Strauss regarding notice to vacate property (.3); confer with counsel regarding meet and confer issues with Chicago Title (.5); draft, revise, finalize, and transmit joint motion to extend deadlines with respect to subpoena to Chicago Title (1.5).	Aspis, Norman	3.20	1,296.00	109,089.90	WO	HD	TR

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03/10/20	8031436	Discuss status and next steps re: hard copy document inventory for document repository with Receiver (.3) advise on issues re: R. Houts document production (.2) communications with SEC counsel re: issues concerning Champion-Cain life insurance policy (.1) revisions to document subpoena to American Express (.2) communications with counsel for Champion-Cain re: information concerning text messages and subpoena re: same (.3)	Fates, Edward (Ted)	1.10	653.40	109,743.30	WO	HD	TR	
03/10/20	8034122	Telephone conference and review index for boxes at ANI offices; review boxes on site and work on index.	Kaup, John	4.80	1,404.00	111,147.30	WO	HD	TR	
03/10/20	8041259	Analysis and determination of document productions in preparation for attorney review.	Peng, Simona	1.50	438.75	111,586.05	WO	HD	TR	
03/10/20	8053488	Conferences, analysis and exchange of e-mails re: document repository issues and timing (.6); review, analysis and exchange of various e-mails re: Chicago Title document issues, filings and strategy (.7).	Farrell, Michael	1.30	930.15	112,516.20	WO	HD	TR	
03/10/20	8053637	Attention to issues in connection with subpoena to R. Houts (.2); Draft, revise, and transmit subpoena to the American Express Company (.7); attention to issues in connection with subpoena to Charter Communications (.3); review, revise, and transmit to the SEC and counsel for Gina Champion-Cain the joint motion to extend the deadlines in connection with the Receiver's subpoena to Chicago Title (.5);	Aspis, Norman	2.10	850.50	113,366.70	WO	HD	TR	

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		attention to issues in connection with production of ANI-related documents (.4).							
03/11/20	8032624	Address issues re: vendors and pricing for proposed document repository (.3) communications with counsel for CalPrivate Bank re: document subpoena (.1)	Fates, Edward (Ted)	0.40	237.60	113,604.30	WO	HD	TR _____
03/11/20	8034203	Update Attorney Fates regarding document review; telephone conference regarding review of digital documents; review and respond to emails; continue review and indexing of boxes at ANI offices.	Kaup, John	5.80	1,696.50	115,300.80	WO	HD	TR _____
03/11/20	8038452	Attention to filing of joint motion with Chicago Title (.3); confer with S. Peng regarding transmittal of ANI-related documents and transmit the same (.3).	Aspis, Norman	0.60	243.00	115,543.80	WO	HD	TR _____
03/11/20	8041279	Analysis and determination of document productions in preparation for attorney review.	Peng, Simona	0.30	87.75	115,631.55	WO	HD	TR _____
03/11/20	8053571	Telephone conferences and analysis re: repository and vendor selection issues (.5); review and analysis of e-mails and attached proposals from various vendors to perform hosting/search functions for repository (1.2)	Farrell, Michael	1.70	1,216.35	116,847.90	WO	HD	TR _____
03/12/20	8033720	Analyze vendor bids/features for proposed document repository (.4) discuss issues re: analysis of Bandini-related transfers with Receiver (.2) communications with counsel for CalPrivate Bank (.1) work on document subpoena to same (.1)	Fates, Edward (Ted)	0.80	475.20	117,323.10	WO	HD	TR _____

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03/12/20	8035287	Review and respond to emails and telephone conference regarding scanning of boxes and review of data; continue review of boxes and indexing at ANI offices.	Kaup, John	3.80	1,111.50	118,434.60	WO	HD	TR	
03/12/20	8037165	Evaluate four proposals related to the document compilation, coding, and copying of the records, assess approach to ESA (1.10). Conference with counsel and assess the strategy related to the document data base (.5).	Zaro, David	1.60	1,260.00	119,694.60	WO	HD	TR	
03/12/20	8037230	Analysis of email and assess negotiations related to the development of the D Street property, follow-up email with Receiver (.6).	Zaro, David	0.60	472.50	120,167.10	WO	HD	TR	
03/12/20	8038381	Confer with counsel regarding issue with filing of joint motion (.2).	Aspis, Norman	0.20	81.00	120,248.10	WO	HD	TR	
03/12/20	8053601	Telephone conference with J. Nittel and analysis re: repository and vendor issues and strategy (.5); conference and analysis re: repository, potential objections and strategy to obtain party/court approval (.6); reviewed court notice and exchanged e-mails re: same (.2).	Farrell, Michael	1.30	930.15	121,178.25	WO	HD	TR	
03/13/20	8034718	Communications with Receiver and counsel for Champion-Cain re: issues relating to credit card accounts and subpoena for records (.3) communications with counsel for CalPrivate Bank re: subpoena (.1) call with counsel for CTC re: document repository and related issues (.3) discuss same with Receiver (.2) address issues re: meet and confer letter to counsel for CTC	Fates, Edward (Ted)	1.80	1,069.20	122,247.45	WO	HD	TR	

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03/13/20	8037749	Email/call with counsel to address the issues related to CTC discovery/informal interviews and attorney/client privilege as well as the contract non-disclosure issues (.4).	Zaro, David	0.40	315.00	122,562.45	WO	HD	TR	
03/13/20	8038264	Draft letter to Chicago Title regarding production of records and confer with counsel regarding the same (2.1); prepare subpoena to CalPrivate Bank and confer with counsel regarding the same (.4); prepare letter regarding Perez claimant and confer with counsel regarding the same (.6); communicate with S. Metzger and counsel regarding certain subpoenas (.3); confer with counsel regarding subpoena to Sprint and review procedures regarding the same (.3).	Aspis, Norman	3.70	1,498.50	124,060.95	WO	HD	TR	
03/13/20	8053615	Conference, analysis and exchange of e-mails re: repository issues and timing (.3); review, analysis and revision of draft letter to Chicago Title and exchanged e-mails re: same (.5).	Farrell, Michael	0.80	572.40	124,633.35	WO	HD	TR	
03/16/20	8036459	Communications with counsel for CTC re: document repository issues (.2) communications with counsel for CalPrivate Bank regarding document subpoena (.1)	Fates, Edward (Ted)	0.30	178.20	124,811.55	WO	HD	TR	

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03/16/20	8038257	Review correspondence from counsel for Chicago Title and confer with counsel regarding the same (.2); confer with counsel and review various requests for subpoenas (.2).	Aspis, Norman	0.40	162.00	124,973.55	WO	HD	TR
03/16/20	8051869	Analysis and exchange of e-mails re: repository issues (.3); reviewed materials re: vendors and strategy for same (.4).	Farrell, Michael	0.70	500.85	125,474.40	WO	HD	TR
03/17/20	8037085	Advise on supplemental subpoena for records to American Express and service of same with office closures (.3) discuss same with Receiver (.2) call with litigation technology specialist re: options and pricing for proposed document repository and next steps re: same (.8) advise on issues re: redactions by Chicago Title and meet and confer re: same (.4)	Fates, Edward (Ted)	1.70	1,009.80	126,484.20	WO	HD	TR
03/17/20	8040896	Email/call with counsel to review issues related to third party subpoenas and coordination issues.	Zaro, David	0.40	315.00	126,799.20	WO	HD	TR
03/17/20	8051824	Preparation for and participation in conference call re: document repository issues and strategy (.9); review and analysis of correspondence from Chicago Title and draft response to same (.3); review, analysis and exchange of e-mails re: revisions to response (.3); reviewed e-mail re: production of Union Bank materials and exchanged e-mails re; strategy to address same (.5)	Farrell, Michael	2.00	1,431.00	128,230.20	WO	HD	TR

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03/17/20	8053146	Attention to meet and confer issues with Chicago Title in connection with protective order (1.3); revise and transmit subpoena to CalPrivate Bank (.4); finalize and transmit letter regarding Perez claimant (.3); prepare subpoena to the American Express Company and attention to service issues (.7).	Aspis, Norman	2.70	1,093.50	129,323.70	WO	HD	TR
03/18/20	8038214	Analyze further protective order and meet and confer issues with subpoena issued to Chicago Title (.4) communications with Chicago Title re: proposed document repository (.2) discuss same with Receiver and G. Rodriguez (.3)	Fates, Edward (Ted)	0.90	534.60	129,858.30	WO	HD	TR
03/18/20	8051729	Review, analysis and exchange of e-mails re: Union Bank documents and strategy for efficient production of same (.7); review and analysis of e-mail and attached document re: Chicago Title documents and proposal for protective order (.3); analysis and exchange of e-mails re: strategy for response to same (.3); review and analysis of correspondence re: repository issues and follow up with consultant (.3).	Farrell, Michael	1.60	1,144.80	131,003.10	WO	HD	TR
03/18/20	8053450	Attention to Union Bank production of records and ANI-related document productions (.6); attention to meet and confer issues with Chicago Title regarding production of documents (.5); attention to issues in connection with subpoena to R. Houts and the American Express Company (.4).	Aspis, Norman	1.50	607.50	131,610.60	WO	HD	TR

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03/19/20	8039458	Communications with Receiver and G. Rodriguez re: electronic ANI data and document repository (.4) analyze and advise on issues re: draft protective order for subpoena issued to CTC and revisions to same (.5)	Fates, Edward (Ted)	0.90	534.60	132,145.20	WO	HD	TR
03/19/20	8041301	Analysis and determination of responsive documents in preparation for attorney review.	Peng, Simona	2.50	731.25	132,876.45	WO	HD	TR
03/19/20	8041513	Assess the issues related to D Street proposal email, assess next steps (.3). Call related to the proposed D Street transaction with Receiver and evaluate alternate structures and terms (.4). Follow-up on the Heston bankruptcy (.4).	Zaro, David	1.10	866.25	133,742.70	WO	HD	TR
03/19/20	8041515	Follow-up on email concerning the discovery issues, subpoena, court order related to CTC discovery (.4).	Zaro, David	0.40	315.00	134,057.70	WO	HD	TR
03/19/20	8051625	Extended telephone conference and analysis re: potential protective order issues and strategy to address same (1.1); review, analysis and revision of draft protective order and exchanged numerous e-mails re: terms of draft order and potential procedural issues with same (1.2); reviewed pertinent procedure materials and analysis re: same (.4); telephone conference and analysis re: results of call with Chicago Title counsel and strategy going forward (.3); analysis and review of e-mails re: repository issues and strategy (.2).	Farrell, Michael	3.20	2,289.60	136,347.30	WO	HD	TR

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03/19/20	8053252	Attention to issues in connection with protective order to govern documents produced by Chicago Title, including extensively conferring with counsel, conferring with C. Waidelech, and revising protective order (2.1); confer with S. Peng regarding Union Bank records (.3); attention to production of ANI-related emails (.4).	Aspis, Norman	2.80	1,134.00	137,481.30	WO	HD	TR	
03/20/20	8040476	Call/emails with Receiver and G. Rodriguez re: document repository and culling of collected ANI data to reduce processing/review costs	Fates, Edward (Ted)	0.80	475.20	137,956.50	WO	HD	TR	
03/20/20	8041307	Analysis and determination of responsive documents in preparation for attorney review.	Peng, Simona	0.80	234.00	138,190.50	WO	HD	TR	
03/20/20	8041914	Confer with S. Peng regarding Union Bank production (.2); confer with S. Peng regarding transmittal of ANI-related emails and transmit the same (.2).	Aspis, Norman	0.40	162.00	138,352.50	WO	HD	TR	
03/20/20	8051547	Preparation for and participation in conference call re: repository issues, timing and strategy (.7); review and analysis of e-mail and attached documents provided by clients (.5); reviewed correspondence with M. Donohue re: repository issues (.2)	Farrell, Michael	1.40	1,001.70	139,354.20	WO	HD	TR	
03/23/20	8044048	Review and analysis of e-mails and redlined protective order re: negotiations with Chicago Title and analysis re: strategy for same.	Farrell, Michael	0.40	286.20	139,640.40	WO	HD	TR	

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03/23/20	8046642	Review records and prepare follow-up letter to Wells Fargo in response to request for additional information (.5).	Aspis, Norman	0.50	202.50	139,842.90	WO	HD	TR	_____
03/23/20	8046649	Review Chicago Title's edits to draft protective order and confer with counsel regarding the same (.2).	Aspis, Norman	0.20	81.00	139,923.90	WO	HD	TR	_____
03/24/20	8042856	Analyze and advise on protective order re: documents produced by CTC in response to subpoena (.4) analyze issues re: note amendment requested by BayMedica (.3) discuss same with Receiver (.1) address issues re: ANI document repository (.4)	Fates, Edward (Ted)	1.20	712.80	140,636.70	WO	HD	TR	_____
03/24/20	8044028	Review BayMedica Note Amendment and background documents.	Hall, Debra	0.50	357.75	140,994.45	WO	HD	TR	_____
03/24/20	8046609	Draft and revise protective order regarding Chicago Title's document production and confer with counsel regarding the same (.8).	Aspis, Norman	0.80	324.00	141,318.45	WO	HD	TR	_____
03/24/20	8051431	Review, analysis and exchange of numerous e-mails, and review of documents and court orders, re: scope and terms of protective order and strategy for negotiation of same (.8); analysis and review of e-mails re: repository issues and timing of resolution of same (.3).	Farrell, Michael	1.10	787.05	142,105.50	WO	HD	TR	_____
03/25/20	8043939	Advise on revisions to protective order re: document produced by CTC in response to subpoena (.5) address issues re: deadline to raise objections to CTC subpoena response (.2) revisions to joint motion to extend deadline (.4) address issues re:	Fates, Edward (Ted)	1.90	1,128.60	143,234.10	WO	HD	TR	_____

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		BayMedica note amendment and revisions to same (.3) discuss same with Receiver (.2) communications with AUSA re: document requests (.2) advise Receiver re: same (.1)							
03/25/20	8045017	Review and respond to emails and forward inventory of Joelle Hanson boxes at ANI offices.	Kaup, John	0.20	58.50	143,292.60	WO	HD	TR
03/25/20	8045318	Follow up on issues relating to Notes and amendment. (.3) Provide revisions to BayMedica Note Amendment. (.3)	Hall, Debra	0.60	429.30	143,721.90	WO	HD	TR
03/25/20	8045439	Calls regarding the negotiations regarding D Street development and associated loan.	Zaro, David	0.20	157.50	143,879.40	WO	HD	TR
03/25/20	8046431	Attention to intake of files from CalPrivate Bank and transmit the same to K. Freitag (.3); review of protective order between Receiver and Chicago Title and confer with counsel regarding the same (.6); draft and revise joint motion for extension of deadline, confer with counsel regarding the same, and transmit the same to SEC and counsel for Ms. Champion-Cain (1.5).	Aspis, Norman	2.40	972.00	144,851.40	WO	HD	TR
03/25/20	8051348	Review, analysis and revision of draft protective order and exchanged e-mails re: same (.4); analysis and exchange of various e-mails re: scope of joint motion to extend time and strategy for same (.6); review, analysis and revision of multiple drafts of joint motion and exchanged e-mails re: same (.9).	Farrell, Michael	1.90	1,359.45	146,210.85	WO	HD	TR

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03/26/20	8045003	Communications with W. Caldarelli and counsel for CTC re: document repository and request from W. Caldarelli re: bank records (.6) advise Receiver on issues re: life insurance policies (.2) call with Receiver and life insurance consultant re: same (.4) address issues re: subpoena to R. Houts and document production (.3)	Fates, Edward (Ted)	1.50	891.00	147,101.85	WO	HD	TR	
03/26/20	8045458	Analysis and determination of document productions in preparation for attorney review.	Peng, Simona	0.30	87.75	147,189.60	WO	HD	TR	
03/26/20	8046335	Attention to several case administration issues with document productions and subpoenas, including subpoena to R. Houts and production of ANI-related emails (.8); Review records produced from Union Bank, confer with counsel for Chicago Title regarding Union Bank records, and transmit invoice to K. Freitag regarding the same (1); review correspondence and images regarding Hancock property, confer with counsel regarding the same, and email K. Freitag regarding the same (.4); confer with counsel regarding joint motion to grant protective order and joint motion to extend deadline, attention to filing joint motion to extend deadline (.9).	Aspis, Norman	3.10	1,255.50	148,445.10	WO	HD	TR	
03/26/20	8050326	Review, analysis and exchange of various e-mails re: repository issues, timing and strategy (.4); review and analysis of memorandum re: DISCO services and potential plan to create repository and analysis re: potential issues re: same (.6);	Farrell, Michael	1.40	1,001.70	149,446.80	WO	HD	TR	

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		review, analysis and exchange of e-mails regarding protective order and joint motion issues and strategy (.4).							
03/27/20	8046202	Analyze and advise on issues re: proposed ANI document repository (.4) calls/emails with Receiver, counsel for SEC, and counsel for CTC re: same (1.3)	Fates, Edward (Ted)	1.70	1,009.80	150,456.60	WO	HD	TR
03/27/20	8046611	Confer with L. Ryan regarding subpoena to J.P. Morgan Chase (.2).	Aspis, Norman	0.20	81.00	150,537.60	WO	HD	TR
03/27/20	8047758	Review and respond to email regarding boxes of accounting records at ANI offices.	Kaup, John	0.10	29.25	150,566.85	WO	HD	TR
03/27/20	8048440	Preparation for and participation in conference call with J. Nittel and clients re: data repository issues and strategy (.9); follow up telephone conferences re: issues raised on call and analysis re: handling of same (.8); drafted summary of data analysis approach and exchanged e-mails re: same (.5); preparation for and participation in conference call with SEC and Chicago Title re: depository approach and issues and analysis re: results of same (1.1)	Farrell, Michael	3.30	2,361.15	152,928.00	WO	HD	TR
03/30/20	8047894	Analyze and advise on revisions to joint motion for approval of protective order governing confidential information contained in CTC document production pursuant to subpoena (.3) address next steps re: document analysis for repository (.3)	Fates, Edward (Ted)	0.60	356.40	153,284.40	WO	HD	TR

08/05/20 20:52:43 PROFORMA STATEMENT FOR MATTER 378827.00003 (Krista Freitag, as Receiver for ANI Deve) (SEC v. Champion-Cain - Asset Investigati)

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

Trans Date	Index	Description of Service Rendered	Timekeeper	Hours	Fees	Sum	Circle Action		
03/30/20	8050077	Review, analysis and exchange of e-mails re: joint motion and repository issues (.6); review and analysis of custodian spread sheet re: disclosure to third parties and exchanged e-mails re: same (.5); revised spread sheet for distribution (.3).	Farrell, Michael	1.40	1,001.70	154,286.10	WO	HD	TR
03/30/20	8050398	Analysis and determination of document productions in preparation for attorney review.	Peng, Simona	0.50	146.25	154,432.35	WO	HD	TR
03/30/20	8051329	Confer with Wells Fargo, Western Alliance Bank, and American Express regarding subpoena responses (.6).	Aspis, Norman	0.60	243.00	154,675.35	WO	HD	TR
03/30/20	8051399	Call with counsel regarding TriCorp lien, the development of D Street, follow-up with the Receiver (.4).	Zaro, David	0.40	315.00	154,990.35	WO	HD	TR
03/31/20	8049605	Advise on revisions to joint motion for approval of protective order for confidential information in CTC subpoena response	Fates, Edward (Ted)	0.20	118.80	155,109.15	WO	HD	TR
03/31/20	8050404	Analysis and determination of document productions in preparation for attorney review.	Peng, Simona	0.30	87.75	155,196.90	WO	HD	TR
03/31/20	8052795	Review and analysis of revised draft of joint motion to approve protective order and exchanged various e-mails re: same (.5); revised custodian spread sheet and exchanged e-mails with counsel re: same (.5).	Farrell, Michael	1.00	715.50	155,912.40	WO	HD	TR
03/31/20	8168932	Revise subpoena tracking chart and transmit the same to L. Ryan (.6); review	Aspis, Norman	1.80	729.00	156,641.40	WO	HD	TR

08/05/20 20:52:43 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
		correspondence from Western Alliance Bank and transmit production to K. Freitag and L. Ryan (.5); revise joint motion to enter stipulated protective order and confer with counsel regarding the same (.7).					

Proforma Summary

Timekeeper

Number	Timekeeper	Hours	Rate	Amounts
000313	Zaro, David	16.60	787.50	13,072.50
000739	Farrell, Michael	66.10	715.50	47,294.55
000820	Kaup, John	30.70	292.50	8,979.75
001578	Hall, Debra	1.10	715.50	787.05
001665	Fates, Edward (Ted)	73.30	594.00	43,540.20
002307	Peng, Simona	21.20	292.50	6,201.00
002348	Williams, Rebecca	3.40	301.50	1,025.10
002369	Aspis, Norman	81.10	405.00	32,845.50
002373	Gallaher, Georgia	9.90	292.50	2,895.75
		303.40		\$156,641.40
Subtotal Fees				\$156,641.40
Discount				0.00
Total Fees				156,641.40
Total Disbursements				0.00

Attorney Billing Instructions

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

Billing Instructions

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

Account Summary – As Of 08/05/20

08/05/20 20:52:43 PROFORMA STATEMENT FOR MATTER 378827.00003 (Krista Freitag, as Receiver for ANI Deve) (SEC v. Champion-Cain - Asset Investigati)

	Fiscal YTD			Calendar YTD			LTD		
	Total	Fees	Disb.	Total	Fees	Disb.	Total	Fees	Disbursements
Worked	86,743.80	86,743.80	0.00	372,008.70	372,008.70	0.00	156,641.40	156,641.40	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	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 Balance	382,245.12	381,540.60	704.52						
AR Balance	0.00	0.00	0.00						
Unalloc Payment	0.00								
Client Trust Balance	0.00								

Billing Address

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

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08/05/20 20:52:46 PROFORMA STATEMENT FOR MATTER 378827.00004 (Krista Freitag, as Receiver for ANI Deve) (SEC v. Champion-Cain - Reporting)

Preliminary Billing Form

Billing Atty: 001665 - Fates, Edward (Ted)

Matter #: 378827.00004

Client Name: Krista Freitag, as Receiver for ANI Deve

Date of Last Billing: 04/29/20

Matter Name: SEC v. Champion-Cain - Reporting

Proforma Number: 1048841

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	
01/17/20	55220	Discuss content and preparation of 2nd interim report with Receiver.	Fates, Edward (Ted)	0.40	237.60	237.60	WO	HD	TR
01/20/20	57970	Analysis of tax issues and 1099, call with Receiver and work on draft of the Receiver's report, follow-up re same (.8). Email with the Receiver related to the report (.3). Research/analysis of the legal issues related to loan terms, pre-payment penalties, late fees and default/interest (1.2).	Zaro, David	2.30	1,811.25	2,048.85	WO	HD	TR
01/21/20	52444	Revisions to Receiver's 2nd interim report (2.7); discuss same with Receiver (.5); review draft exhibits on receivership assets and advise Receiver on content/format for same (.3); revisions to main asset summary schedule (.4).	Fates, Edward (Ted)	3.90	2,316.60	4,365.45	WO	HD	TR
01/22/20	57750	Call with counsel/advice re Receiver report, follow-up on issues.	Zaro, David	0.40	315.00	4,680.45	WO	HD	TR

08/05/20 20:52:46 PROFORMA STATEMENT FOR MATTER 378827.00004 (Krista Freitag, as Receiver for ANI Deve) (SEC v. Champion-Cain - Reporting)

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

Trans Date	Index	Description of Service Rendered	Timekeeper	Hours	Fees	Sum	Circle	Action	
01/23/20	131700	Work on the insert to the Receiver Report, revise draft, analysis of issues per Receiver/counsel calls.	Zaro, David	0.90	708.75	5,389.20	WO	HD	TR
01/24/20	62981	Discuss revisions to 2nd interim report with Receiver (.2); work on same (.6).	Fates, Edward (Ted)	0.80	475.20	5,864.40	WO	HD	TR
01/24/20	131707	Analysis of the open issues related to the Receiver Report (.2).	Zaro, David	0.20	157.50	6,021.90	WO	HD	TR
01/27/20	57903	Revisions to Receiver's 2nd interim report (1.4); discuss same with Receiver (.3).	Fates, Edward (Ted)	1.70	1,009.80	7,031.70	WO	HD	TR
01/28/20	136434	Discuss revisions to 2nd interim report and exhibits with Receiver.	Fates, Edward (Ted)	0.40	237.60	7,269.30	WO	HD	TR
01/30/20	127850	Call/revise draft report, advice concerning third party claims (.4).	Zaro, David	0.40	315.00	7,584.30	WO	HD	TR
01/30/20	132099	Meet and confer communications with SEC counsel regarding 2nd interim report (.4); discuss same with Receiver (.3).	Fates, Edward (Ted)	0.70	415.80	8,000.10	WO	HD	TR
01/31/20	137010	Follow-up on the open issues in the report to address third party litigation issue (.8). Call/advice to counsel related to report and recommendations (.3).	Zaro, David	1.10	866.25	8,866.35	WO	HD	TR
02/03/20	7994215	Revisions to 2nd interim report as to discussion of potential claims against Chicago Title and exhibits (.4); discuss same with Receiver (.2).	Fates, Edward (Ted)	0.60	356.40	9,222.75	WO	HD	TR
02/06/20	7998698	Discuss final revisions/updates to 2nd interim report and exhibit with Receiver (.4);	Fates, Edward (Ted)	0.90	534.60	9,757.35	WO	HD	TR

08/05/20 20:52:46 PROFORMA STATEMENT FOR MATTER 378827.00004 (Krista Freitag, as Receiver for ANI Deve) (SEC v. Champion-Cain - Reporting)

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

Trans Date	Index	Description of Service Rendered	Timekeeper	Hours	Fees	Sum	Circle Action
		work on same (.5).					

Proforma Summary**Timekeeper**

Number	Timekeeper	Hours	Rate	Amounts
000313	Zaro, David	5.30	787.50	4,173.75
001665	Fates, Edward (Ted)	9.40	594.00	5,583.60
		14.70		\$9,757.35
Subtotal Fees				\$9,757.35
Discount				0.00
Total Fees				9,757.35
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 08/05/20

	Fiscal YTD			Calendar YTD			LTD		
	Total	Fees	Disb.	Total	Fees	Disb.	Total	Fees	Disbursements
Worked	0.00	0.00	0.00	13,143.15	13,143.15	0.00	9,757.35	9,757.35	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	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						

08/05/20 20:52:46 PROFORMA STATEMENT FOR MATTER 378827.00004 (Krista Freitag, as Receiver for ANI Deve) (SEC v. Champion-Cain - Reporting)

WIP	13,143.15	13,143.15	0.00
Balance			
AR Balance	0.00	0.00	0.00
Unalloc	0.00		
Payment			
Client Trust	0.00		
Balance			

Billing Address

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

}

08/05/20 20:52:47 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: 1048841

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	
01/02/20	132738	Communications with counsel for Champion-Cain regarding EDD issue with Chicken Pharm restaurant and R. Mosely lease (.4); discuss closing costs for Keller Street and Lamont Street sales with Receiver (.2); work on accounting report regarding same (.4); work on proposal regarding procedures for sales of receivership assets (.6); discuss same with Receiver (.1).	Fates, Edward (Ted)	1.70	1,009.80	1,009.80	WO	HD	TR
01/03/20	33110	Conference with Receiver and email with Receiver re Pullman Lofts, follow-up to advise Receiver (.6).	Zaro, David	0.60	472.50	1,482.30	WO	HD	TR
01/03/20	132985	Communications with counsel for Champion-Cain regarding EDD issue concerning Chicken Pharm restaurant (.2); discuss lease issues regarding R. Mosely with Receiver (.2); revisions to proposed property sale procedures (.9); discuss same with Receiver (.4).	Fates, Edward (Ted)	1.70	1,009.80	2,492.10	WO	HD	TR

08/05/20 20:52:47 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			
01/06/20	27718	Confirm status of Lease amendments for Patio Group.	Lorenzen, Jonathan	0.60	313.20	2,805.30	WO	HD	TR	_____
01/06/20	117936	Analysis of the documents re Pullman/Santa Rosa project, term sheets and Receiver cash flow to prepare for meeting (.6). Attend call with Receiver related to Pullman investment and recovery (.2). Draft narrative for Receiver motion/transfer of interest (.2).	Zaro, David	1.00	787.50	3,592.80	WO	HD	TR	_____
01/06/20	135887	Discuss next steps regarding potential sale of Pullman membership interest with Receiver (.2).	Fates, Edward (Ted)	0.20	118.80	3,711.60	WO	HD	TR	_____
01/07/20	27757	Review Leases to confirm transfer requirements.	Lorenzen, Jonathan	0.60	313.20	4,024.80	WO	HD	TR	_____
01/07/20	27856	Advise on issues regarding potential restaurant sales and landlord consents to potential lease assignments (.3).call with counsel for proposed buyer of Pullman interest regarding Court approval process (.3).advise Receiver regarding same (.3).work on Receiver's accounting of costs of sales per Court orders (.8).discuss same with Receiver (.3).advise regarding revisions to PSA for Pullman membership interest (.3).advise Receiver on issues regarding Luv Surf consignment agreement (.2).	Fates, Edward (Ted)	2.50	1,485.00	5,509.80	WO	HD	TR	_____
01/07/20	62894	Confer regarding resolution of open issues on proposed agreement. (.3) Revise agreement to eliminate Pullman II and add	Hall, Debra	1.60	1,144.80	6,654.60	WO	HD	TR	_____

08/05/20 20:52:47 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			
		repayment of \$25,000. (1.3)								
01/08/20	26126	Review Leases for Surf Rider Ocean Beach, Surf Rider Mission Beach and Bao Beach, and prepare analysis of assignment requirements in leases.	Lorenzen, Jonathan	1.80	939.60	7,594.20	WO	HD	TR	_____
01/08/20	33130	Advise on issues regarding draft joint motion for approval of sale of Pullman membership interest and revisions to PSA for same (.4); communications with Receiver regarding issues related to termination of Patio Marketplace contract (.2); analyze issues raised in Cal Private Bank response to motion for authority to sell personal property and liquor licenses (.3); advise Receiver regarding same (.1); finalize accounting of costs of sale for Lamont and Keller Street sales (.2).	Fates, Edward (Ted)	1.20	712.80	8,307.00	WO	HD	TR	_____
01/08/20	122736	Revise draft of narrative to support sale of personal property interest in Pullman/Santa Rosa Apt Project (.4). Email to/call with counsel related to Pullman Project (.3). Work on the outline and drafting of a joint motion to sell/transfer of personal property interest in the Pullman asset (1.9).	Zaro, David	2.60	2,047.50	10,354.50	WO	HD	TR	_____
01/09/20	117864	Discuss revisions to Pullman PSA as to funds paid to JB Resources with Receiver and D. Hall (.3); communications with Receiver and Century Club regarding possible sale of PGA golf tickets (.3); work on omnibus reply to CalPrivate Bank's responses to sale motions (.4).	Fates, Edward (Ted)	1.00	594.00	10,948.50	WO	HD	TR	_____

08/05/20 20:52:47 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			
01/09/20	122668	Review comments to Purchase and Sale Agreement from potential purchaser (0.7); discuss Purchase and Sale Agreement with K. Freitag (0.2); review Lease agreements for restaurants and prepare form of Assignment, Consent to Assignment and Amendment for use at properties (2.9); prepare revised version of Purchase and Sale Agreement form (0.4).	Lorenzen, Jonathan	4.20	2,192.40	13,140.90	WO	HD	TR	_____
01/09/20	122984	Several emails and work related to the Pullman Project draft of joint motion (.4).	Zaro, David	0.40	315.00	13,455.90	WO	HD	TR	_____
01/10/20	24436	Finalize revisions to Purchase and Sale Agreement and forward to counsel for Purchaser. Call from Counsel for Purchaser.	Hall, Debra	2.30	1,645.65	15,101.55	WO	HD	TR	_____
01/10/20	117984	Review comments to form Purchase and Sale Agreement from potential Buyer and review with Receiver (1.2); review and revise form Purchase and Sale Agreement for Leases (3.7); review and revise form Consent, Assignment and Amendment for Leases (0.4).	Lorenzen, Jonathan	5.30	2,766.60	17,868.15	WO	HD	TR	_____
01/10/20	122969	Address revisions to Pullman PSA (.2); discuss same with Receiver (.1); call with counsel for J. McGrory regarding same (.2); analyze CalPrivate Bank further response to property sale procedures (.1); revise omnibus reply regarding same (.2).	Fates, Edward (Ted)	0.80	475.20	18,343.35	WO	HD	TR	_____
01/13/20	24435	Call with Bob Edmunds regarding origin and recipient of \$25,000 finders' fee advance. Follow up on same.	Hall, Debra	0.60	429.30	18,772.65	WO	HD	TR	_____

08/05/20 20:52:47 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			
01/13/20	30497	Finalize notice of non-receipt of overbids for Brighton Court property (.1); communications with Receiver regarding omnibus reply to CalPrivate Bank responses to sale motions (.2); communications with Receiver and ANI outside trademark counsel regarding Swell trademark issues and potential sale of other marks (.4); communications with counsel for Patio 101 landlord regarding status of personal property and liquor license sale motion (.2); discuss issues regarding ANI payments to JB Resources with Receiver and counsel (.4); revisions to joint motion for approval of Pullman sale (.2); communications with counsel for Goldfinch landlord regarding status/timing of joint motion (.2).	Fates, Edward (Ted)	1.70	1,009.80	19,782.45	WO	HD	TR	_____
01/13/20	65888	follow-up on the Goldfinch motion, status and call from lessor (.2). Confer with counsel and advice re recovery on investment interests and several emails concerning the foregoing (.4).	Zaro, David	0.60	472.50	20,254.95	WO	HD	TR	_____
01/13/20	68422	Work on draft of the motion to sell the Pullman LLC interests and follow-up on agreement (.5). Call with counsel, draft Receiver declaration to support motion to sell the Pullman interest (.7).	Zaro, David	1.20	945.00	21,199.95	WO	HD	TR	_____
01/14/20	24544	Communications with court law clerk regarding proposed order for sale procedures and status/timing of Joint Motions regarding sales of personal	Fates, Edward (Ted)	3.90	2,316.60	23,516.55	WO	HD	TR	_____

08/05/20 20:52:47 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			
		property and liquor licenses (.2); prepare proposed order (.2); discuss issues with analysis and payment of accrued PTO with Receiver (.2); revisions to omnibus reply and notice of no overbid for Rancho Mirage (.3); discuss same with Receiver (.2); advise on revisions to Joint Motion to approve Pullman sale (.4); discuss same with Receiver (.2); advise Receiver on issues related to ANI employee W-2 tax statements and amendments to same (.4); advise on issues related to transfer of Patio Marketplace liquor licenses (.3); revisions to draft consignment agreement for apparel and other personal property (.9); discuss same with Receiver (.3); advise Receiver on issues related to employee health plan coverage (.3).								
01/14/20	30777	Complete revisions to form Purchase and Sale Agreement for Leases and send for review by Receiver and potential Buyers.	Lorenzen, Jonathan	1.80	939.60	24,456.15	WO	HD	TR	
01/14/20	65605	Prepare liquor license transfer documents for multiple locations.	Klinger, Warren	2.20	1,039.50	25,495.65	WO	HD	TR	
01/14/20	65885	Analyze issue regarding W-2 distribution.	Bell, Melissa	0.30	121.50	25,617.15	WO	HD	TR	
01/14/20	68750	Work on the issues related to the sale of the Pullman interest, Receiver declaration (.6). Call with counsel related to sale of LLC interests (.2). Follow-up calls/work related to the sale of assets and revisions to the Pullman sale motion (.8).	Zaro, David	1.60	1,260.00	26,877.15	WO	HD	TR	

08/05/20 20:52:47 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	
01/15/20	30835	Complete revisions to form Purchase and Sale Agreements and Assignment, Consent and Amendment to Lease for various properties, and send updated versions for review by potential buyers.	Lorenzen, Jonathan	1.80	939.60	27,816.75	WO	HD	TR
01/15/20	62891	Review checks made under finders agreement and revise agreement to reflect actual facts of claim for return of finder's fee. Call with Buyer's counsel regarding various issues.	Hall, Debra	0.50	357.75	28,174.50	WO	HD	TR
01/15/20	65856	Call with Receiver and ANI outside trademark counsel regarding Swell co-existence agreement and valuation/marketing of other ANI-owned trademarks (.5); advise on revisions to joint motion and supporting declaration regarding Pullman sale (.4).	Fates, Edward (Ted)	0.90	534.60	28,709.10	WO	HD	TR
01/15/20	68752	Work on revisions, email/call with counsel related to changes to Receiver's declaration/motion re Pullman Lofts Project to address project history, Receiver analysis (.6). Emails related to the Pullman transaction/brief (.2).	Zaro, David	0.80	630.00	29,339.10	WO	HD	TR
01/15/20	8168894	Advise Receiver on issues and analysis/approach to Hancock Street property, mechanic's liens, and related issues (.2).	Fates, Edward (Ted)	0.20	118.80	29,457.90	WO	HD	TR
01/16/20	50843	Prepare standalone Purchase and Sale Agreement for Liquor License.	Klinger, Warren	2.90	1,370.25	30,828.15	WO	HD	TR

08/05/20 20:52:47 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		
01/16/20	52408	Calls/advice to Receiver and counsel related to the Pullman sale and follow-up related to changes to PSA agreement/motion (.4).	Zaro, David	0.40	315.00	31,143.15	WO	HD	TR	
01/16/20	55231	Review liquor licensing issues (0.8); complete additional revisions to Form Purchase and Sale Agreements and send updated versions for review (2.6); review Parking Lot Lease and begin preparing Purchase and Sale Agreement for leasehold interest (0.9)	Lorenzen, Jonathan	4.30	2,244.60	33,387.75	WO	HD	TR	
01/16/20	58076	Emails with Purchaser's counsel regarding Buyer's deliveries and filing of motion. (.4) Call with Buyer's counsel regarding same. Review and revise motion and declaration to address included sale of claim. (.8) Revisions to purchase agreement regarding Buyer's deliveries and filing of motion and other matters raised by Buyer's counsel. (.4) Call and emails with Buyer's counsel regarding changes. (.2) Finalize and send cumulative redline and execution copy to Buyer's counsel. (.2)	Hall, Debra	2.00	1,431.00	34,818.75	WO	HD	TR	
01/16/20	65548	Advise on revisions to PSA for sale of Pullman membership interest.	Fates, Edward (Ted)	0.20	118.80	34,937.55	WO	HD	TR	
01/17/20	52623	Prepare Liquor License Purchase and Sale Agreement incorporating provisions requested by Receiver, including that all closing, escrow and transfer costs are borne by Buyer and that there is no purchase price.	Klinger, Warren	2.60	1,228.50	36,166.05	WO	HD	TR	

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01/17/20	55221	Finalize omnibus reply to CalPrivate Bank responses to sale-related motions (.2); advise Receiver regarding issues of broker press release regarding prospective sales of restaurants (.2); advise issues/timing for Pullman PSA execution and Court approval (.3); advise Receiver on issues regarding potential sale of Cultivate products (.2).	Fates, Edward (Ted)	0.90	534.60	36,700.65	WO	HD	TR
01/17/20	63997	Review execution copy forwarded by buyer's counsel; emails to Receiver regarding execution of final agreement.	Hall, Debra	0.30	214.65	36,915.30	WO	HD	TR
01/21/20	52445	Advise Receiver regarding response to media inquiry regarding prospective restaurant sales (.2); communications with counsel for Champion-Cain regarding proposed joint motion regarding telephonic appearance at sale motion hearing on 1/24 (.2).	Fates, Edward (Ted)	0.40	237.60	37,152.90	WO	HD	TR
01/21/20	57717	Prepare liquor license transfer agreements (2.1); Analysis of termination letter agreement (.7).	Klinger, Warren	2.80	1,323.00	38,475.90	WO	HD	TR
01/21/20	61453	Complete preparation of PSA for parking lot located on Mission Blvd.	Lorenzen, Jonathan	1.10	574.20	39,050.10	WO	HD	TR
01/21/20	64130	Emails related to the prospective sale of assets (.2). Follow-up on the Pullman, stipulated joint motion and meet/confer (.4).	Zaro, David	0.60	472.50	39,522.60	WO	HD	TR
01/22/20	52641	Advise Receiver on responses to media inquiries regarding prospective restaurant sales (.6); discuss preparation for 1/24 hearing on sale motions with Receiver (.2);	Fates, Edward (Ted)	1.20	712.80	40,235.40	WO	HD	TR

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		analyze order establishing uniform sale procedures, advise Receiver regarding same (.4).							
01/22/20	57974	Revise termination letter and liquor license agreement based in review of underlying Food Service Agreement based on fact that there is no express requirement to transfer the license at Seller's expense.	Klinger, Warren	1.60	756.00	40,991.40	WO	HD	TR _____
01/23/20	57888	Discuss Joint Motion regarding Pullman sale with SEC counsel (.2); prepare for 1/24 hearing on pending sale motions (.4).	Fates, Edward (Ted)	0.60	356.40	41,347.80	WO	HD	TR _____
01/24/20	62982	Communications with counsel for prospective buyer of Goldfinch personal property and liquor license regarding 1/24 hearing (.2); advise Receiver on issues regarding termination of Patio Marketplace operations at Irvine spectrum location (.3); revise draft communications regarding same (.1); advise on issues regarding escrow for prospective sale of Pullman membership interest (.2); prepare for and attend hearing on pending sale motions (1.7); analyze order approving sale motions and advise Receiver regarding same (.4).	Fates, Edward (Ted)	2.90	1,722.60	43,070.40	WO	HD	TR _____
01/26/20	136529	Emails, review/analysis of the sale order, ambiguity as to use of sale proceeds (.4).	Zaro, David	0.40	315.00	43,385.40	WO	HD	TR _____
01/27/20	52610	Call with Receiver, counsel re motion related to Pullman sale, follow-up as to relief and sale proceeds (.3).	Zaro, David	0.30	236.25	43,621.65	WO	HD	TR _____

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01/27/20	57904	Communications with Court chambers to clarify order as to Brighton Court sale proceeds (.2); discuss same with Receiver (.1); communications with G. Rodriguez regarding certified copies of sale approval order and title issues (.2); communications with Receiver regarding deposit for Pullman transaction (.2).	Fates, Edward (Ted)	0.70	415.80	44,037.45	WO	HD	TR	
01/28/20	131644	Review Landlord's revisions to Sixth Amendment to Lease for Hines Intersect.	Lorenzen, Jonathan	0.60	313.20	44,350.65	WO	HD	TR	
01/28/20	132190	Attention to termination notice and liquor license transfer.	Klinger, Warren	1.90	897.75	45,248.40	WO	HD	TR	
01/28/20	136435	Discuss title issues and amendments needed to Thomas Avenue and Brighton Court sale orders with Receiver (.2); work on ex parte application regarding same (1.2); analyze correspondence from counsel for A. Taylor, issues with A. Taylor lease, and next steps (.4); analyze legal issues regarding termination of Hines-Intersect lease/restaurant management contract (.3).	Fates, Edward (Ted)	2.10	1,247.40	46,495.80	WO	HD	TR	
01/28/20	136890	Revise the draft of the Pullman Lofts sale, joint motion and declaration (.5). Call with counsel concerning the Pullman sale/earnest money (.2). Emails with Receiver related to draft motion, order and declaration (.4).	Zaro, David	1.10	866.25	47,362.05	WO	HD	TR	
01/29/20	52586	Discuss concerns regarding Rancho Mirage sale order and possible need to amend sale with G. Rodriguez (.3); communications with G. Rodriguez regarding amended order	Fates, Edward (Ted)	1.40	831.60	48,193.65	WO	HD	TR	

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		needed for Rancho Mirage sale (.4); advise on preparation of joint ex parte motion and related papers (.2); advise Receiver on issues relating to closure of Patio Marketplace restaurants at Irvine Spectrum and Hines-Intersect locations (.5).							
01/30/20	52720	Review status of various purchase and sale transactions, and confer to coordinate.	Lorenzen, Jonathan	1.10	574.20	48,767.85	WO	HD	TR
01/30/20	53011	Confer with counsel regarding joint ex parte motion to amend sale order regarding certain properties (.4).	Aspis, Norman	0.40	162.00	48,929.85	WO	HD	TR
01/30/20	117375	Prepare for and attend conference call with the Krista Freitag, Geno Rodriguez, attorney Ted Fates, and attorney Jonathan Lorenzen re: strategy for approaching the purchase and sale agreements for various properties.	Thiels, Megan	1.10	356.40	49,286.25	WO	HD	TR
01/30/20	132100	Calls/emails with Receiver and G. Rodriguez regarding uniform sale procedures, bidding process for restaurants, and sale approval process (.7); follow up communications with counsel regarding same (.2); address HOA issues regarding Bella Pacific property (.2).	Fates, Edward (Ted)	1.10	653.40	49,939.65	WO	HD	TR
01/30/20	136887	Analysis of food service agreement termination and liquor license transfer.	Klinger, Warren	1.20	567.00	50,506.65	WO	HD	TR
01/31/20	54069	Prepare draft joint ex parte motion regarding amending sales of certain properties (3.3); confer with counsel regarding the same (.4).	Aspis, Norman	3.70	1,498.50	52,005.15	WO	HD	TR

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01/31/20	136910	Calls/emails with Receiver and G. Rodriguez regarding title issues with closing Thomas Avenue and Brighton Court sales and joint ex parte motion to amend sale orders (.7); advise on preparation of joint ex parte motion (.3); revisions to same (.6).	Fates, Edward (Ted)	1.60	950.40	52,955.55	WO	HD	TR	_____
02/03/20	7994229	Advise Receiver regarding communications from J. Burns regarding payments related to Pullman project.	Fates, Edward (Ted)	0.20	118.80	53,074.35	WO	HD	TR	_____
02/03/20	7994964	Amend joint motion to amend Rancho Mirage sale motion order and confer with counsel regarding the same (.2).	Aspis, Norman	0.20	81.00	53,155.35	WO	HD	TR	_____
02/04/20	7995723	Review form of Purchase and Sale Agreement, and identify items needed to complete for Keller.	Lorenzen, Jonathan	0.60	313.20	53,468.55	WO	HD	TR	_____
02/04/20	7995957	Discuss issues regarding Thomas Avenue closing with Receiver and proposed Joint Ex Parte Motion regarding same (.4); revisions to Joint Ex Parte Motion (.7); meet and confer communications with counsel for SEC and counsel for Champion-Cain regarding same (.2); work on supporting declarations and proposed order (.4).	Fates, Edward (Ted)	1.70	1,009.80	54,478.35	WO	HD	TR	_____
02/04/20	7996528	Prepare declaration of K. Freitag (.4); declaration of T. Fates (.2); and proposed order (.2) in support of rancho mirage sale motion.	Aspis, Norman	0.80	324.00	54,802.35	WO	HD	TR	_____
02/05/20	7997061	Analysis of escrow instructions.	Klinger, Warren	0.80	378.00	55,180.35	WO	HD	TR	_____

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02/05/20	7997218	Review and respond to correspondence regarding Keller, and coordinate preparation of Purchase and Sale Agreement.	Lorenzen, Jonathan	0.40	208.80	55,389.15	WO	HD	TR	_____
02/05/20	7997240	Discuss termination of lease for rental unit with G. Rodriguez and termination agreement for same (.3); initial work on same (.2); discuss issues regarding Thomas Avenue closing and amended order on Rancho Mirage with G. Rodriguez (.3); discuss contingency release for Carmel property with G. Rodriguez and initial work on sale approval motion (.7).	Fates, Edward (Ted)	1.50	891.00	56,280.15	WO	HD	TR	_____
02/05/20	8024591	Review, draft, and revise declaration of K. Freitag in support of motion to amend sale order regarding the Rancho Mirage property (.4).	Aspis, Norman	0.40	162.00	56,442.15	WO	HD	TR	_____
02/06/20	7997975	Begin drafting the termination amendment for the residential lease with Adreann Price at 4030 Randolph Street; begin drafting the Purchase and Sale Agreement for 140 Keller Street.	Thiels, Megan	6.20	2,008.80	58,450.95	WO	HD	TR	_____
02/06/20	7998599	Review status of Purchase and Sale Agreements.	Lorenzen, Jonathan	0.50	261.00	58,711.95	WO	HD	TR	_____
02/06/20	7998712	Advise G. Rodriguez on issues relating to unsolicited offers on W. Washington and University properties (.2); work on motion to approve sale of Carmel property (1.4); communications with Receiver and G. Rodriguez regarding same (.3).	Fates, Edward (Ted)	1.90	1,128.60	59,840.55	WO	HD	TR	_____

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02/07/20	7999046	Review updated draft of Lease Amendment for Patio at Hines Intersect (0.6); review Purchase and Sale Agreement for Keller (0.7); review Amendment for Randolph Street (0.6).	Lorenzen, Jonathan	1.90	991.80	60,832.35	WO	HD	TR	_____
02/07/20	7999096	Prepare accounting of costs of sale of Brighton Court (.4); discuss same with Receiver (.2); advise on issues related to transfer of liquor license for Hines-Intersect lease (.4); discuss same with Receiver (.3); advise on lease amendment/assignment for Hines-Intersect (.3); revisions to lease termination document for Randolph Street apartment (.1); work on motion to approve sale of Carmel Property (.2).	Fates, Edward (Ted)	1.90	1,128.60	61,960.95	WO	HD	TR	_____
02/07/20	7999278	Continue drafting the termination amendment for the residential lease with Adreann Price at 4030 Randolph Street; correspond with the client re: such agreement.	Thiels, Megan	0.60	194.40	62,155.35	WO	HD	TR	_____
02/10/20	8000504	Prepare for and attend call with the client to discuss the status of the restaurant purchase and sale agreements.	Thiels, Megan	0.40	129.60	62,284.95	WO	HD	TR	_____
02/10/20	8000897	Review summary of current offers for various properties and begin preparing purchase and sale agreements.	Lorenzen, Jonathan	1.90	991.80	63,276.75	WO	HD	TR	_____
02/10/20	8000908	Advise Receiver on auction of personal property located at Carmel property and issues regarding C. Salas lease default (.4); advise Receiver on responses to media	Fates, Edward (Ted)	2.10	1,247.40	64,524.15	WO	HD	TR	_____

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		inquiries (.3); advise G. Rodriguez regarding tax lien on Tennyson Street property (.2); discuss amendment to Thomas Avenue sale order with Receiver (.2); work on Joint Ex Parte Motion regarding same (.7); call with Receiver and G. Rodriguez regarding restaurant sales and overbid procedures (.3).								
02/11/20	8001543	Revisions to Joint Ex Parte Motion re: amendment to Thomas Avenue sale order (.4) discuss same with Receiver (.2) meet and confer communications with SEC counsel and Champion-Cain counsel (.2) work on auctioneer consignment agreement with Abamex (.6) discuss same and tax issues for sales with Receiver (.3) revisions to sale motion for Carmel Property re: marketing info and related facts (.4) discuss same with Receiver and G. Rodriguez (.1) work on declarations and proposed order for Joint Ex Parte Motion re: Thomas Avenue (.6) address issues re: Hines-Intersect lease assignment and liquor license transfer (.4) discuss same with Receiver (.3) discuss issues relating to leases on Valle Vista property and Diamond Street property with counsel for Champion-Cain (.2)	Fates, Edward (Ted)	3.70	2,197.80	66,721.95	WO	HD	TR	_____
02/11/20	8001594	Begin reviewing and analyzing the purchase and sale agreement drafts provided by the client; begin drafting the purchase and sale agreement for the parking lot fee with David McKinnon.	Thiels, Megan	2.40	777.60	67,499.55	WO	HD	TR	_____

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02/11/20	8001633	Review entity issues for Saska's properties and related due diligence information, and review and revise Purchase and Sale Agreements.	Lorenzen, Jonathan	1.10	574.20	68,073.75	WO	HD	TR	
02/11/20	8002680	Prepare proposed order regarding amendment to order approving Thomas Avenue property along with supporting declaration of T. Fates and K. Freitag and attend to filing issues (.9).	Aspis, Norman	0.90	364.50	68,438.25	WO	HD	TR	
02/12/20	8002786	Analysis of escrow instructions.	Klinger, Warren	0.60	283.50	68,721.75	WO	HD	TR	
02/12/20	8003412	Review info from counsel for Champion-Cain re: Hancock Street property and discuss same with Receiver (.2) revisions to sale motion re: Carmel property, discuss same with Receiver (.3) advise Receiver re: order amending Thomas Avenue sale order (.1) advise on terms of restaurant and parking lot PSAs and overbid/court approval process (.4) address issues re: termination notice from Biomed and communications with counsel for Biomed re: liquor license issues (.4) work on notice of motion, Receiver declaration and proposed order on Carmel sale motion (.6)	Fates, Edward (Ted)	2.00	1,188.00	69,909.75	WO	HD	TR	
02/12/20	8003415	Review due diligence documents related to 3800 Mission Blvd and revise related Purchase and Sale Agreement (1.5); review membership agreement for 140 Keller and complete preparation of Purchase and Sale Agreement (1.4); review draft for La Mesa Surfrider (0.5).	Lorenzen, Jonathan	3.40	1,774.80	71,684.55	WO	HD	TR	

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02/12/20	8003888	Begin drafting the Purchase and Sale Agreement for Saska's with OMG Hospitality; begin drafting the Purchase and Sale Agreement for the Ocean Beach Surf Rider Pizza location with Mark Likgaiter.	Thiels, Megan	3.70	1,198.80	72,883.35	WO	HD	TR	_____
02/13/20	8004007	Review and revise Purchase and Sale Agreement for parking lot located at 3800 Mission Blvd.	Lorenzen, Jonathan	1.60	835.20	73,718.55	WO	HD	TR	_____
02/13/20	8004613	Finalize Carmel sale motion and supporting declaration (.3) communications with G. Rodriguez re: documents included in exhibit (.1)	Fates, Edward (Ted)	0.40	237.60	73,956.15	WO	HD	TR	_____
02/13/20	8005091	Analysis of escrow instructions re: Hangar.	Klinger, Warren	1.80	850.50	74,806.65	WO	HD	TR	_____
02/14/20	8005130	Communications with Receiver and counsel for Biomed Realty re: liquor license for Patio Marketplace location (.4) discuss motion to approve Tennyson Street sale with G. Rodriguez (.4) initial work on sale approval motion (.3) advise Receiver on issues re: potential sale of Cultivate brand and product (.4) communications with Receiver and ANI outside IP counsel re: info on Swell trademarks for restaurant sale process (.3)	Fates, Edward (Ted)	1.80	1,069.20	75,875.85	WO	HD	TR	_____
02/14/20	8005836	Prepare Lease Termination Agreement for Mission Blvd properties and review corresponding Purchase and Sale Agreement based on updated title and escrow.	Lorenzen, Jonathan	2.10	1,096.20	76,972.05	WO	HD	TR	_____

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02/14/20	8006001	Analysis of West Sacramento permit negotiations and D Street strategy related to development, email to Receiver re advice as to negotiations/strategy.	Zaro, David	0.40	315.00	77,287.05	WO	HD	TR
02/16/20	8006263	Continue drafting, editing and revising the Purchase and Sale Agreement for Saksa's including, but not limited to, Articles 1 through 5 of such Agreement.	Thiels, Megan	1.20	388.80	77,675.85	WO	HD	TR
02/17/20	8006297	Continue drafting, editing and revising the Purchase and Sale Agreement for Saska's including, but not limited to, Articles 6 through 15 of such Agreement.	Thiels, Megan	2.40	777.60	78,453.45	WO	HD	TR
02/18/20	8006972	Prepare Purchase and Sale Agreement for University Apartments property (2.4); review Saska's Purchase and Sale Agreement (0.7); review Purchase and Sale Agreement for 3779 Mission Blvd (0.3); review status charts for properties and confer internally (0.7).	Lorenzen, Jonathan	4.10	2,140.20	80,593.65	WO	HD	TR
02/18/20	8007005	Work on motion for approval of sale of Tennyson Street property (1.6) discuss same with Receiver and G. Rodriguez (.2) address issues re: hearing date for motion (.2) advise G. Rodriguez on issues with contractual arbitration clause (.3) advise on terms of PSA for restaurant leases, FF&E, liquor licenses, etc. (.2)	Fates, Edward (Ted)	2.50	1,485.00	82,078.65	WO	HD	TR
02/18/20	8007703	Continue drafting, editing and revising the Purchase and Sale Agreement for Saska's including, but not limited to, the exhibits to such Agreement (2.2); begin drafting the	Thiels, Megan	6.40	2,073.60	84,152.25	WO	HD	TR

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		Purchase and Sale Agreement with Michael Turk for the leased parking lot (1.7); begin drafting the Purchase and Sale Agreement with OMG Hospitality for Surf Rider Pizza in Mission Beach (2.1); continue drafting the Purchase and Sale Agreement with Mark Likgaiter for Surf Rider Pizza in Ocean Beach (.4).							
02/19/20	8007838	Continue drafting the Purchase and Sale Agreement with OMG Hospitality for the Surf Rider Pizza location in Mission Beach (1.8); continue drafting the Purchase and Sale Agreement with Mark Likgaiter for the Surf Rider Pizza location in Ocean Beach (1.6).	Thiels, Megan	3.40	1,101.60	85,253.85	WO	HD	TR
02/19/20	8007887	Discuss liquor license issue re: Patio Marketplace with Receiver and counsel for Biomed Realty (.2) revisions to Tennyson sale motion (.6) discuss same with Receiver and G. Rodriguez (.2) work on Receiver declaration and proposed order for Tennyson sale motion (.9)	Fates, Edward (Ted)	1.90	1,128.60	86,382.45	WO	HD	TR
02/19/20	8007922	Review and revise Purchase and Sale Agreements for the sale of leasehold interests in Surf Rider Ocean Beach and Mission Beach.	Lorenzen, Jonathan	1.60	835.20	87,217.65	WO	HD	TR
02/20/20	8009275	Address issues re: EDD lien on Tennyson property and sale motion (.2) communications with G. Rodriguez re: same (.1) communications with counsel for ANICO re: release prices for Saska's restaurant property and parking lot property	Fates, Edward (Ted)	1.70	1,009.80	88,227.45	WO	HD	TR

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		(.4) communications with counsel for Hines re: liquor license transfer issues (.2) discuss publication of notice for Tennyson sale with G. Rodriguez (.1) advise G. Rodriguez on issues with sale process and valuations for University Ave. property (.4) address issues with draft PSA for Swell restaurant property (.3)							
02/20/20	8009855	Review and revise Purchase and Sale Agreements for Surf Rider properties.	Lorenzen, Jonathan	1.40	730.80	88,958.25	WO	HD	TR
02/20/20	8009972	Continue drafting, editing and revising the Purchase and Sale Agreement with Mark Likgaiter for the Surf Rider Pizza location in Ocean Beach (2.1); begin drafting the Purchase and Sale Agreement with Jane Cohen and Mordechai Ami Cohen for Swell Coffee Co (.6).	Thiels, Megan	2.70	874.80	89,833.05	WO	HD	TR
02/21/20	8010146	Continue editing and revising the Purchase and Sale Agreement for Saska's with OMG Hospitality (.7); prepare for and attend call with Geno Rodriguez to discuss multiple sellers issue (.5).	Thiels, Megan	1.20	388.80	90,221.85	WO	HD	TR
02/21/20	8010242	Analysis of the Court order related to the Pullman Lofts sale, follow-up with counsel (.3). Emails with counsel related to the approach to Receiver response and supplemental brief (.3).	Zaro, David	0.60	472.50	90,694.35	WO	HD	TR
02/21/20	8010540	Analysis of revised escrow instructions (1.0); Attention to multiple sellers issues for restaurants with different parties who own the real estate versus the liquor license (.4)	Klinger, Warren	1.40	661.50	91,355.85	WO	HD	TR

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02/21/20	8010596	Review issues related to Purchase and Sale Agreements, and revise drafts.	Lorenzen, Jonathan	1.60	835.20	92,191.05	WO	HD	TR	_____
02/21/20	8010985	Conduct UCC Financing Search	Fisher, Wade	0.60	164.70	92,355.75	WO	HD	TR	_____
02/21/20	8011061	Finalize Tennyson sale motion, supporting declaration, and proposed order (.4) advise on Hines-Intersect liquor license issue (.2) discuss issues re: rent for Diamond St. property with Receiver (.1) communications with Receiver and G. Rodriguez re: revisions to PSA's for restaurant sales and timing (.6) advise G. Rodriguez on property repairs, lease termination, and tenant move-out issues (.3) analyze issues re: clarification of Pullman-related entities and status as receivership entities (.2) discuss same with Receiver and SEC counsel (.3)	Fates, Edward (Ted)	2.10	1,247.40	93,603.15	WO	HD	TR	_____
02/22/20	8011191	Continue editing and revising the Purchase and Sale Agreement for Saska's to accommodate that there are two separate sellers which are selling the purchased assets under the agreement.	Thiels, Megan	1.60	518.40	94,121.55	WO	HD	TR	_____
02/23/20	8011269	Discuss accountings for costs of sale for Thomas Avenue and Rancho Mirage with Receiver	Fates, Edward (Ted)	0.20	118.80	94,240.35	WO	HD	TR	_____
02/23/20	8011293	Analysis of escrow instructions and comments thereto.	Klinger, Warren	0.50	236.25	94,476.60	WO	HD	TR	_____
02/24/20	8011691	Review/evaluate the Court's order related to sale of the interest in Pullman Lofts Project,	Zaro, David	1.30	1,023.75	95,500.35	WO	HD	TR	_____

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		draft supplemental response as to affiliated entity and release of party (1.3).							
02/24/20	8011715	Review and revise draft Purchase and Sale Agreement for Saska's (1.6); review Lease termination issues for Crown Point (0.4); coordinate completion of Purchase and Sale Agreements (0.4).	Lorenzen, Jonathan	2.60	1,357.20	96,857.55	WO	HD	TR
02/24/20	8012207	Work on accounting of costs of sale for Thomas Avenue (.4) discuss same with Receiver (.2) advise Receiver re: execution of co-existence agreement for Swell trademarks (.2) address issues re: restaurant PSAs and sale approval process (.3) work on accounting of costs for Rancho Mirage sale (.4)	Fates, Edward (Ted)	1.50	891.00	97,748.55	WO	HD	TR
02/24/20	8023294	Continue drafting, editing and revising the Purchase and Sale Agreement with OMG Hospitality for Saks's (1.1); continue drafting, editing and revising the Purchase and Sale Agreement with OMG Hospitality for the Surf Rider Pizza location in La Mesa (.8).	Thiels, Megan	1.90	615.60	98,364.15	WO	HD	TR
02/25/20	8013216	Review and revise Purchase and Sale Agreement for Surf Rider La Mesa.	Lorenzen, Jonathan	1.60	835.20	99,199.35	WO	HD	TR
02/25/20	8013241	Revisions to supplement to Joint Motion re: sale of Pullman membership interest	Fates, Edward (Ted)	0.30	178.20	99,377.55	WO	HD	TR
02/25/20	8013595	Evaluate issues, revise draft joint supplement to the Pullman Sale Motion to address Court Order (.7). Emails related to Pullman joint supplement to Receiver, SEC	Zaro, David	1.10	866.25	100,243.80	WO	HD	TR

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Trans Date	Index	Description of Service Rendered and Champion-Cain (.4).	Timekeeper	Hours	Fees	Sum	Circle Action			
02/25/20	8023387	Continue drafting, editing and revising the Purchase and Sale Agreement for Swell Coffee Co. with Jane and Mordechai Cohen.	Thiels, Megan	2.80	907.20	101,151.00	WO	HD	TR	_____
02/26/20	8013723	Analyze and advise Receiver on Phase II vendor agreement for W. Washington property (.3) prepare addendum to same (.7) advise G. Rodriguez on sale process for leased restaurants and related personal property (.3) analyze correspondence from counsel for SPS re: loan on Carmel property and advise Receiver re: same (.4) respond to counsel for SPS (.2) advise G. Rodriguez on tenant dispute and potential resolution of same (.3) assist in drafting correspondence re: same (.3) advise Receiver on IP/trademark issues for sale of Swell restaurant property (.3)	Fates, Edward (Ted)	2.80	1,663.20	102,814.20	WO	HD	TR	_____
02/26/20	8013729	Review and revise Purchase and Sale Agreement for Swell Coffee property (1.8); review status of various other property agreements (0.6).	Lorenzen, Jonathan	2.40	1,252.80	104,067.00	WO	HD	TR	_____
02/26/20	8013952	Follow-up/revise draft of supplement to joint motion re Pullman interest sale (.4). Emails concerning the Pullman sale transaction (.2).	Zaro, David	0.60	472.50	104,539.50	WO	HD	TR	_____
02/26/20	8023407	Continue drafting, editing and revising the Purchase and Sale Agreement for the Surf Rider Pizza location in Crown Point with DIF LLC (1.4); review and analyze the	Thiels, Megan	2.10	680.40	105,219.90	WO	HD	TR	_____

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02/27/20	8015275	Revisions to letter re: termination of lease for warehouse space	Fates, Edward (Ted)	0.30	178.20	105,398.10	WO	HD	TR	_____
02/27/20	8015392	Review Purchase and Sale Agreement for Crown Point (1.1); review signed Purchase and Sale Agreement for Saska's (0.4); review intellectual property issues for Swell (0.9); review status of property issues for leasehold transactions (0.8).	Lorenzen, Jonathan	3.20	1,670.40	107,068.50	WO	HD	TR	_____
02/27/20	8015460	Emails related to the supplemental brief re Pullman sale and filing.	Zaro, David	0.30	236.25	107,304.75	WO	HD	TR	_____
02/27/20	8023438	Finish drafting the Purchase and Sale Agreement for the Surf Rider Pizza location in Crown Point with DIF LLC (1.9); correspond with the client re: such draft of the Crown Point Agreement (.4); begin drafting the Purchase and Sale Agreement for Himmelberg's with Apline 1 and TCB SD LLC (2.8).	Thiels, Megan	4.10	1,328.40	108,633.15	WO	HD	TR	_____
02/28/20	8015805	Review status of Crown Point Purchase and Sale Agreement and most recent draft (0.9); review and revise Purchase and Sale Agreement for Himmelbergs (1.0).	Lorenzen, Jonathan	1.90	991.80	109,624.95	WO	HD	TR	_____
02/28/20	8015817	Advise on purchase and sale terms for Crown Point and Saska's restaurant properties (.4) address issues re: mechanic's lien on Carmel property, discuss same with Receiver (.6) revisions to letter to contractor re: same (.4) discuss media	Fates, Edward (Ted)	2.40	1,425.60	111,050.55	WO	HD	TR	_____

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		inquiries and responses to same with Receiver (.2) advise Receiver on tenant dispute and lease termination issue (.3) assist in preparing correspondence re: same (.2) discuss operational issues at Lamont restaurant with Receiver (.3)							
02/28/20	8023489	Continue drafting, editing and revising the Purchase and Sale Agreement for the Surf Rider Pizza location in Crown Point with DIF LLC (1.4); continue drafting, editing and revising the Purchase and Sale Agreement for Swell Coffee Co. with Jane and Mordechai Cohen (2.1); continue drafting, editing and revising the Purchase and Sale Agreement for Himmelberg's with Alpine 1 and TCB SD LLC (.5); begin drafting, editing and revising the Purchase and Sale Agreement for Bao Beach with Oswaldo and Consuelo Rodriguez (.4).	Thiels, Megan	4.40	1,425.60	112,476.15	WO	HD	TR _____
03/02/20	8023048	Address employee concern at Patio on Lamont restaurant, discuss same with Receiver (.6) analyze issues re: potential sale of Patio on Lamont property and status re: Symetra loan (.5) address issues re: mechanic's lien on Carmel property (.3)	Fates, Edward (Ted)	1.40	831.60	113,307.75	WO	HD	TR _____
03/02/20	8024564	Review due diligence information for various properties.	Lorenzen, Jonathan	0.80	417.60	113,725.35	WO	HD	TR _____
03/02/20	8039974	Edit and revise the Bao Beach purchase and sale agreement including, but not limited to, the provisions relating to the overbid procedures and the exhibits; Edit and revise the OB Surf Rider purchase and	Thiels, Megan	5.20	1,684.80	115,410.15	WO	HD	TR _____

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		sale agreement to include the overbid procedures and the applicable provisions relating to the assignment of lease.								
03/03/20	8025575	Advise on revisions to purchase and sale agreement re: forum selection and buyer's consent to jurisdiction (.3) communications with Receiver and counsel for buyer of Pullman membership interest re: Court order on briefing and approval of sale (.8) revise amendment to PSA for Pullman, discuss same with counsel (.4) discuss status and next steps re: mechanic's lien on Carmel property and sale motion with G. Rodriguez (.6) call with W. Caldarelli re: Patio on Lamont operations and sale efforts (.2) update Receiver re: same (.1) advise on revisions to PSA for Swell Coffee property (.2) analyze and advise Receiver on issues with payroll vendor and employee W2 statements (.5)	Fates, Edward (Ted)	3.10	1,841.40	117,251.55	WO	HD	TR	
03/03/20	8026660	TC with Freitag and accountants re. tax issues [0.8 hr]. Tax research regarding receivership and taxation of proceeds from Chicago Title.	Kraus, Katherine	3.00	1,957.50	119,209.05	WO	HD	TR	
03/03/20	8026663	Review and revise Purchase and Sale Agreement for Surf Rider Ocean Beach (0.8); review and revise Purchase and Sale Agreement for Bao Beach (0.8); revise Saska's issues and discuss with Buyer's attorney (1.0); review and revise Purchase and Sale Agreements regarding leasehold interests (1.0).	Lorenzen, Jonathan	3.60	1,879.20	121,088.25	WO	HD	TR	

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03/03/20	8028155	Call/analysis of the purchase and sale agreement as it relates to the Pullman interest and seller warranty (.4). Follow-up on sale of the Lamont Property, lender issues, negotiations and call with Receiver(.2). Address Pullman order, draft proposed order related to release of Pullman upon closing of sale of interest (.6).	Zaro, David	1.20	945.00	122,033.25	WO	HD	TR	_____
03/03/20	8028443	Call from counsel to the purchaser. (.3) Review Clarification of Motion to Sell LLC Membership Interest. (.3) Draft amendment to Membership Interest Purchase and Sale Agreement to add in as condition of closing the release of Pullman Lofts I from the receivership. (.6)	Hall, Debra	1.20	858.60	122,891.85	WO	HD	TR	_____
03/03/20	8039981	Edit and revise the Saska's and La Mesa Surf Rider purchase and sale agreements based on the Buyer's attorney's acceptable comments re: the Temporary Liquor License; prepare a comparison between the swell purchase and sale agreement prepared by the Buyer and the form purchase and sale agreement.	Thiels, Megan	2.10	680.40	123,572.25	WO	HD	TR	_____
03/04/20	8026806	Revise correspondence with payroll vendor re: W2 tax statements (.3) communications with Receiver re: amendment to Pullman PSA (.2) advise Receiver on strategy and next steps re: potential sale of University Ave. property and issues with SFG loan (.6)	Fates, Edward (Ted)	1.10	653.40	124,225.65	WO	HD	TR	_____
03/04/20	8027214	Review various purchase and sale agreements and coordinate execution.	Lorenzen, Jonathan	0.90	469.80	124,695.45	WO	HD	TR	_____

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03/04/20	8028208	Further revisions to draft response/order concerning release from injunction upon sale closing.	Zaro, David	0.30	236.25	124,931.70	WO	HD	TR	
03/04/20	8038650	Review purchaser's counsel's changes to Pullman Lofts amendment regarding clarification of closing conditions and respond to same.	Hall, Debra	0.40	286.20	125,217.90	WO	HD	TR	
03/04/20	8040049	Edit and revise the Saska's purchase and sale agreement and prepare a final execution version of such agreement; correspond with OMG Hospitality's legal counsel re: the Saska's purchase and sale agreement; edit and revise the Swell purchase and sale agreement and prepare a final execution version of such agreement; edit and revise the fee parking lot purchase and sale agreement with Mr. McKinnon and prepare a final execution version of such agreement.	Thiels, Megan	2.60	842.40	126,060.30	WO	HD	TR	
03/05/20	8028124	Review correspondence.	Lorenzen, Jonathan	0.60	313.20	126,373.50	WO	HD	TR	
03/05/20	8028153	Discuss motions to approve prospective sales of Saska's and Swell restaurant properties with Receiver (.4) initial work on sale motions and background facts needed for same (.9)	Fates, Edward (Ted)	1.30	772.20	127,145.70	WO	HD	TR	
03/05/20	8040056	Edit and revise the purchase and sale agreement with Mr. McKinnon for the fee parking lot; prepare the final execution version of such agreement with Mr. Mckinnon; correspond with the client re: the	Thiels, Megan	0.90	291.60	127,437.30	WO	HD	TR	

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03/06/20	8028898	Advise and assist with temporary access agreement for prospective buyer for 301 D Street property (.3) advise Receiver on Pullman approval order (.1) communications with counsel for Pullman buyer (.1) advise Receiver re: warehouse lease termination issues (.2)	Fates, Edward (Ted)	0.70	415.80	127,853.10	WO	HD	TR	_____
03/06/20	8029197	Review updated entity information for potential purchasers or property, coordinate preparation of early access agreement.	Lorenzen, Jonathan	0.90	469.80	128,322.90	WO	HD	TR	_____
03/06/20	8031588	Analysis of the Pullman sale order from the court (.3). Address the follow-up order per Judge Burns' order related to the release of Pullman (.3).	Zaro, David	0.60	472.50	128,795.40	WO	HD	TR	_____
03/06/20	8040082	Draft the temporary access agreement for the potential buyer of 301 D Street; correspond with the client re: the status of the purchase and sale agreements.	Thiels, Megan	2.80	907.20	129,702.60	WO	HD	TR	_____
03/09/20	8030151	Discuss operational and sale issues re: Lamont property with Receiver (.3) analyze information for restaurant sale motions and discuss same with Receiver and G. Rodriguez (.9) initial work on motions (.4)	Fates, Edward (Ted)	1.60	950.40	130,653.00	WO	HD	TR	_____
03/09/20	8031106	Review status of Purchase and Sale Agreements.	Lorenzen, Jonathan	0.60	313.20	130,966.20	WO	HD	TR	_____
03/09/20	8040098	Correspond with OMG's counsel re: the La Mesa Surf Rider purchase and sale agreement; begin preparing the final	Thiels, Megan	0.70	226.80	131,193.00	WO	HD	TR	_____

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		execution version of the La Mesa Surf Rider purchase and sale agreement.							
03/10/20	8031640	Address issues re: University Ave. purchase and sale agreement (.2) revisions to letter to EDD re: tax payments and lien on Tennyson property (.5) discuss same with Receiver (.2) work on motion for approval of sale of Swell Coffee property and personal property (1.6) discuss same with Receiver (.3)	Fates, Edward (Ted)	2.80	1,663.20	132,856.20	WO	HD	TR
03/10/20	8031846	Review correspondence and related Purchase and Sale Agreement drafts.	Lorenzen, Jonathan	2.30	1,200.60	134,056.80	WO	HD	TR
03/10/20	8033002	Evaluate the proposed sales of Carmel and Tennyson properties, and the payment/statements (.6). Follow-up on the Pullman sale order, the order concerning the release of Pullman LLC from receivership (.5).	Zaro, David	1.10	866.25	134,923.05	WO	HD	TR
03/10/20	8040109	Edit and revise the the purchase and sale agreement with Xequity for that property commonly known as University Apartments to include the provision relating to assignment of the leases, prepare the final execution version of such agreement; prepare the final execution version of the purchase and sale agreement with OMG for the La Mesa Surf Rider property; correspond with OMG's counsel re: the La Mesa Surf Rider purchase and sale agreement; prepare clean and redline versions of the revised Himmelberg's purchase and sale agreement and	Thiels, Megan	2.60	842.40	135,765.45	WO	HD	TR

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03/10/20	8091632	Work on Swell Coffee sale motion.	Fates, Edward (Ted)	0.40	237.60	136,003.05	WO	HD	TR
03/11/20	8032563	Review comments to Crown Point Purchase and Sale Agreement; review issues related to Crown Point property.	Lorenzen, Jonathan	0.90	469.80	136,472.85	WO	HD	TR
03/11/20	8032564	Communications with Receiver re: lack of overbids for Carmel and Tennyson properties and notices to Court re: same (.2) work on notices (.4) discuss Swell sale motion with Receiver and G. Rodriguez (.3) work on revisions to same (.7) work on Receiver declaration and proposed order for Swell sale motion (.8) work on motion for approval of sale of Saska's property, FF&E and liquor license (1.8) discuss same with Receiver (.2)	Fates, Edward (Ted)	4.40	2,613.60	139,086.45	WO	HD	TR
03/11/20	8034406	Address residential sale process, review/evaluate the Tennyson sale motion/declaration and follow-up concerning the Receiver's reply/notice (.6). Review of the Carmel sale motion/sale order and follow-up concerning reply/notice (.4). Conference with Receiver and email regarding reply briefs (.3).	Zaro, David	1.30	1,023.75	140,110.20	WO	HD	TR
03/11/20	8040115	Begin drafting the purchase and sale agreement for that property commonly known as the Patio on Lamont with Alpine 1 and TCB SD LLC as the Buyer; compare Buyer's executed draft of the University	Thiels, Megan	3.60	1,166.40	141,276.60	WO	HD	TR

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		Apartments purchase and sale agreement against the final execution version of such agreement; compare Buyer's executed draft of the Bao Beach purchase and sale agreement against the final execution version of such agreement.								
03/12/20	8033703	Revisions to Receiver declaration in support of Swell sale motion (.7) discuss same with Receiver (.2) revisions to Saska's sale motion (.5) assist with preparing draft statements to restaurant employees, ANI corporate employees, and co-work employees re: coronavirus precautions (.9) discuss same with Receiver (.4) work on Receiver declaration and proposed order for Saska's sale motion (.9) advise Receiver on issues re: execution of Swell trademark co-existence agreement (.2) work on motion for approval of sale of owned parking lot (1.2) advise Receiver re: order approving Carmel sale (.1)	Fates, Edward (Ted)	5.10	3,029.40	144,306.00	WO	HD	TR	
03/12/20	8033901	Review issues and related correspondence for Purchase and Sale Agreements.	Lorenzen, Jonathan	1.90	991.80	145,297.80	WO	HD	TR	
03/12/20	8034568	Draft advice and communications for use in restaurants, corporate offices, and co-working spaces regarding COVID-19.	Bell, Melissa	2.40	972.00	146,269.80	WO	HD	TR	
03/12/20	8040118	Prepare for and attend call with the client and Mr. Dan Frysh re: the purchase and sale agreement for that property commonly known as Crown Point; edit and revise such purchase and sale agreement for Crown Point based on such conference call.	Thiels, Megan	3.10	1,004.40	147,274.20	WO	HD	TR	

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03/13/20	8034705	Discuss issues re: Swell sale and personal property auctions with Receiver (.3) revisions to motion re: sale of owned parking lot (.6) discuss same with Receiver (.2) work on Receiver declaration and proposed order for sale of owned parking lot (.9) communications with SEC counsel re: sale motions (.2) work on motion re: sale of Surf Rider (La Mesa) property (.7) discuss sale of Zanzibar property and motion for Court approval with G. Rodriguez (.4)	Fates, Edward (Ted)	3.30	1,960.20	149,234.40	WO	HD	TR	_____
03/13/20	8040120	Correspond with client re: the purchase and sale agreement for that property commonly known as Crown Point with DIF LLC.	Thiels, Megan	0.30	97.20	149,331.60	WO	HD	TR	_____
03/16/20	8036084	Review terms of additional purchase and sale agreements.	Lorenzen, Jonathan	0.60	313.20	149,644.80	WO	HD	TR	_____
03/16/20	8036427	Advise Receiver on issues re: coronavirus and temporary restaurant closures (.2) advise Receiver re: sale closings and recording issues due to coronavirus recording office closures (.2) communications with court clerk re: Tennyson Street sale motion (.2) work on notice re: EDD lien (.4)	Fates, Edward (Ted)	1.00	594.00	150,238.80	WO	HD	TR	_____
03/16/20	8039613	Several emails related to Pullman Lofts sale/order, follow-up with USDC (.4). Call with Receiver related to Pullman Lofts sale (.2). Call with counsel related to closing, extensions related to restaurant properties (.3).	Zaro, David	0.90	708.75	150,947.55	WO	HD	TR	_____

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03/16/20	8040125	Begin reviewing the information provided by the client for that certain property located at 901-915 West Washington Street; develop strategy re: drafting a form agreement for the sale of such property.	Thiels, Megan	0.60	194.40	151,141.95	WO	HD	TR	_____
03/17/20	8037080	Communications with Receiver and G. Rodriguez re: motion for approval of sale of Zanzibar property (.4) work on motion (1.5) advise Receiver and G. Rodriguez re: order approving Tennyson sale (.2)	Fates, Edward (Ted)	2.10	1,247.40	152,389.35	WO	HD	TR	_____
03/17/20	8040131	Prepare the final execution version of the purchase and sale agreement for Bao Beach with Oswaldo and Consuelo Gonzalez; continue drafting, editing and revising the form of purchase and sale agreement for 901-915 West Washington Street.	Thiels, Megan	4.30	1,393.20	153,782.55	WO	HD	TR	_____
03/18/20	8038078	Review and revise form of Purchase and Sale Agreement for Washington, Hancock and Mission properties.	Lorenzen, Jonathan	1.30	678.60	154,461.15	WO	HD	TR	_____
03/18/20	8038444	Revisions to Zanzibar sale motion (.6) discuss same with Receiver and G. Rodriguez (.3) discuss issues re: modified restaurant operations and potential sales/overbids with Receiver (.3)	Fates, Edward (Ted)	1.20	712.80	155,173.95	WO	HD	TR	_____
03/18/20	8039960	Correspond with client re: payment of the documentary transfer tax upon the closing of a sale of real property; edit and revise the form of the purchase and sale agreement for 901-915 Washington Street based on	Thiels, Megan	1.10	356.40	155,530.35	WO	HD	TR	_____

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Trans Date	Index	Description of Service Rendered the client's direction.	Timekeeper	Hours	Fees	Sum	Circle	Action	
03/18/20	8041498	Call/email related to the sale of the restaurant assets/overbids.	Zaro, David	0.20	157.50	155,687.85	WO	HD	TR
03/19/20	8039283	Work on Receiver declaration, proposed order, and notice of motion for Zanzibar sale (.9) discuss same with Receiver (.2) revisions to declaration (.2) finalize motion and exhibit (.2) advise on issues re: sale of owned parking lot and Surf Rider LM property (.3) advise and assist Receiver with coronavirus-related notices to restaurant employees (.6)	Fates, Edward (Ted)	2.40	1,425.60	157,113.45	WO	HD	TR
03/19/20	8039305	Review and revise Purchase and Sale Agreement for Washington Street property and other related retail properties.	Lorenzen, Jonathan	2.20	1,148.40	158,261.85	WO	HD	TR
03/19/20	8039950	Continue editing and revising the purchase and sale agreement for 901 W Washington Street; begin drafting the overbid purchase and sale agreement for that restaurant commonly known as Saska's.	Thiels, Megan	2.40	777.60	159,039.45	WO	HD	TR
03/20/20	8040473	Analyze order re: briefing schedule and hearing for Zanzibar sale motion (.1) advise Receiver re: coronavirus-related notices to employees and paid sick leave issues (.6) address issues re: sales of West Washington property, owned parking lot, and potential overbids for Saska's sale (.4)	Fates, Edward (Ted)	1.10	653.40	159,692.85	WO	HD	TR
03/20/20	8040776	Analyze employment issues in light of COVID-19 and draft correspondence to employees regarding the same.	Bell, Melissa	1.00	405.00	160,097.85	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			
03/20/20	8040879	Finish editing and revising the form overbid purchase and sale agreement for that certain restaurant commonly known as Saska's; correspond with the client re: the form overbid purchase and sale agreement for Saska's.	Thiels, Megan	1.10	356.40	160,454.25	WO	HD	TR	_____
03/20/20	8041571	Review and further prepare e-mail to client regarding COVID 19 warning to restaurant employees.	Alexander, Grant	0.40	250.20	160,704.45	WO	HD	TR	_____
03/20/20	8041668	Review and revise purchase and sale agreements.	Lorenzen, Jonathan	1.80	939.60	161,644.05	WO	HD	TR	_____
03/23/20	8041925	Analyze and advise Receiver on operational concerns related to coronavirus and government orders re: same	Fates, Edward (Ted)	0.70	415.80	162,059.85	WO	HD	TR	_____
03/23/20	8042772	Review correspondence regarding status of Purchase and Sale Agreements.	Lorenzen, Jonathan	0.20	104.40	162,164.25	WO	HD	TR	_____
03/23/20	8042843	Analyze issues regarding compliance with state and local orders related to COVID-19.	Bell, Melissa	0.20	81.00	162,245.25	WO	HD	TR	_____
03/23/20	8046875	Edit and revise the 901-915 W Washington purchase and sale agreement with the client's feedback; prepare a new purchase and sale agreement with Michael Turk for the fee parking lot.	Thiels, Megan	2.10	680.40	162,925.65	WO	HD	TR	_____
03/24/20	8042787	Review draft of Purchase and Sale Agreements for Washington Street and 3800 Mission.	Lorenzen, Jonathan	1.20	626.40	163,552.05	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			
03/24/20	8043111	Advise Receiver on title issues re: Carmel sale closing (.4) communications with title company re: same (.5) analyze issues re: life insurance policies on former employees and advise Receiver re: same (.6) communications with life insurance consultant re: same (.3)	Fates, Edward (Ted)	1.80	1,069.20	164,621.25	WO	HD	TR	_____
03/24/20	8044278	Finish editing and revising the new fee parking lot purchase and sale agreement with Michael Turk; prepare clean and redline versions of such new purchase and sale agreement with Michael Turk and correspond with client re: such agreement; continue editing and revising the 901-915 W Washington PSA and correspond with the client re: the Phase I and Phase II reports on such Property.	Thiels, Megan	3.30	1,069.20	165,690.45	WO	HD	TR	_____
03/24/20	8045345	Call with counsel related to the Carmel and the Keller property sales, follow-up email regarding same (.4).	Zaro, David	0.40	315.00	166,005.45	WO	HD	TR	_____
03/25/20	8043869	Advise Receiver re: cash flow projections and debt service payments in light of coronavirus impacts on restaurants and vacation rentals (.4) advise Receiver re: insurance coverage issues related to coronavirus (.2) communications with title company re: issues with Carmel sale closing and Cain Family Trust (.6) advise G. Rodriguex re: same (.3) communications with counsel for G. Champion-Cain and S. Cain re: same (.4) discuss concerns with timing on Court approval of Pullman with Receiver (.2)	Fates, Edward (Ted)	2.10	1,247.40	167,252.85	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			
03/25/20	8044370	Review overbid Purchase and Sale Agreements.	Lorenzen, Jonathan	0.80	417.60	167,670.45	WO	HD	TR	_____
03/25/20	8044587	Draft the overbid purchase and sale agreement for that coffee shop commonly known as Swell; correspond with the client re: such overbid purchase and sale agreement.	Thiels, Megan	1.10	356.40	168,026.85	WO	HD	TR	_____
03/25/20	8045437	Email to address the Pullman Lofts sale transaction, advice to counsel.	Zaro, David	0.20	157.50	168,184.35	WO	HD	TR	_____
03/26/20	8045598	Revise liquor license purchase and sale agreement.	Klinger, Warren	2.50	1,181.25	169,365.60	WO	HD	TR	_____
03/26/20	8045973	Discuss motion re: sale of Bao Beach assets and assignment of lease with Receiver and G. Rodriguez (.4) work on motion (1.4) review status of Pullman filings and communications with court chambers re: same and timing (.3) communications with Receiver and counsel for S. Cain re: Carmel sale and title issues (.7) advise Receiver re: entry of Pullman release order and sale closing issues (.3) communications with counsel for Pullman buyer (.2) address communications from warehouse property manager re: personal property at leased premises (.2) advise on issues re: purchase and sale agreement for former Fireside liquor license (.6)	Fates, Edward (Ted)	4.10	2,435.40	171,801.00	WO	HD	TR	_____
03/26/20	8047939	Emails concerning the sale of real property interests (.3).	Zaro, David	0.30	236.25	172,037.25	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		
03/27/20	8045955	Work on Receiver declaration, proposed order, and notice of motion for Bao Beach sale motion (1.1) communications with Receiver, broker and counsel for S. Cain re: Carmel sale closing issues (.8)	Fates, Edward (Ted)	1.90	1,128.60	173,165.85	WO	HD	TR	_____
03/27/20	8046336	Review draft Liquor License purchase and sale agreement prior to buyer review.	Klinger, Warren	0.40	189.00	173,354.85	WO	HD	TR	_____
03/27/20	8046830	Edit and revise the Himmelberg's purchase and sale agreement provisions relating to the Closing Date.	Thiels, Megan	0.60	194.40	173,549.25	WO	HD	TR	_____
03/29/20	8047681	Analyse issues re: Carmel property sale closing and communications with counsel for S. Cain re: same	Fates, Edward (Ted)	0.20	118.80	173,668.05	WO	HD	TR	_____
03/30/20	8048243	Review correspondence regarding status of Purchase and Sale Agreements and revise accordingly.	Lorenzen, Jonathan	1.20	626.40	174,294.45	WO	HD	TR	_____
03/30/20	8048287	Discuss new offer for parking lot with Receiver (.4) revisions to sale motion re: same (.8) analyze and advise Receiver on employee issues related to coronavirus stay home orders and operational issues (.7) analyze issues raised in ANICO response to Saska's ale motion, advise Receiver re: same (.2) revisions to Receiver declaration and proposed order for parking lot sale motion (.8) finalize motion and exhibit (.3)	Fates, Edward (Ted)	3.20	1,900.80	176,195.25	WO	HD	TR	_____
03/30/20	8048648	Review and analyze the new purchase and sale agreement for the fee parking lot with Richard and Josephine Uy; correspond with the client re: such new purchase and sale	Thiels, Megan	4.20	1,360.80	177,556.05	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	
		agreement; finish editing and revising the provisions related to the Closing Date in the purchase and sale agreement for Himmelberg's with Alpine 1; edit and revise the provisions related to the Real Property Closing Date in the purchase and sale agreement for the Patio on Lamont with Alpine 1.							
03/30/20	8048676	Analyze issues regarding coworking space and essential businesses.	Bell, Melissa	0.40	162.00	177,718.05	WO	HD	TR
03/31/20	8049627	Discuss SBA loans available under CARES stimulus and possible applications for same with Receiver	Fates, Edward (Ted)	0.30	178.20	177,896.25	WO	HD	TR
03/31/20	8052327	Revise liquor license purchase and sale agreement incorporating changes to reflect deposit concept.	Klinger, Warren	1.50	708.75	178,605.00	WO	HD	TR
03/31/20	8168933	Attention to correspondence from landlord at 3760 Hancock Street and confer with K. Freitag regarding the same (.3).	Aspis, Norman	0.30	121.50	178,726.50	WO	HD	TR

Proforma Summary

Timekeeper Number	Timekeeper	Hours	Rate	Amounts
000313	Zaro, David	22.40	787.50	17,640.00
001578	Hall, Debra	8.90	715.50	6,367.95
001665	Fates, Edward (Ted)	109.10	594.00	64,805.40
002115	Lorenzen, Jonathan	78.90	522.00	41,185.80
002244	Bell, Melissa	4.30	405.00	1,741.50
002283	Klinger, Warren	24.70	472.50	11,670.75
002306	Thiels, Megan	93.30	324.00	30,229.20
002369	Aspis, Norman	6.70	405.00	2,713.50

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Proforma Summary**Timekeeper**

Number	Timekeeper	Hours	Rate	Amounts
002372	Kraus, Katherine	3.00	652.50	1,957.50
002408	Alexander, Grant	0.40	625.50	250.20
002411	Fisher, Wade	0.60	274.50	164.70
		<u>352.30</u>		<u>\$178,726.50</u>
Subtotal Fees				\$178,726.50
Discount				0.00
Total Fees				178,726.50
Total Disbursements				0.00

Attorney Billing Instructions

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

Billing Instructions

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

Account Summary – As Of 08/05/20

	Fiscal YTD			Calendar YTD			LTD		
	Total	Fees	Disb.	Total	Fees	Disb.	Total	Fees	Disbursements
Worked	41,119.65	41,119.65	0.00	310,572.90	310,572.90	0.00	178,726.50	178,726.50	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	321,178.50	321,169.50	9.00						
Balance									
AR Balance	0.00	0.00	0.00						
Unalloc	0.00								
Payment									
Client Trust	0.00								
Balance									

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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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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: 1048841

Client/Matter Joint Group # 378827-1

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

Trans Date	Index	Description of Service Rendered	Timekeeper	Hours	Fees	Sum	Circle	Action	
01/02/20	132740	Advise Receiver regarding Symetra loan issues (.2); discuss issues relating to call with Magistrate Judge and Joint Motion regarding ANI documents with SEC counsel (.4); discuss same with Receiver (.4); Advise on issues relating to labor claim asserted by M. Spicer and correspondence from counsel regarding same (.3); attend call with Magistrate Judge regarding Joint Motion regarding ANI documents (.4); update Receiver regarding same (.1).	Fates, Edward (Ted)	1.80	1,069.20	1,069.20	WO	HD	TR
01/02/20	135795	Work on the draft of the Direct Bank funding joint stipulation, advice concerning the scope of order.	Zaro, David	0.60	472.50	1,541.70	WO	HD	TR
01/03/20	136262	Analysis of further potential issues as to life insurance and make further revisions to the draft of the BankDirect joint stipulation related to loan (.6). Call concerning the Symetra loan and pre-payment issues (.2).	Zaro, David	0.80	630.00	2,171.70	WO	HD	TR

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

Trans Date	Index	Description of Service Rendered	Timekeeper	Hours	Fees	Sum	Circle	Action		
01/06/20	122672	Call with the Receiver related to Bank Direct joint stipulation and address revisions to same (.3).	Zaro, David	0.30	236.25	2,407.95	WO	HD	TR	_____
01/07/20	27853	Call with SEC counsel regarding supplemental joint motion regarding ANI documents (.4).call/emails regarding same and related issues with W. Caldarelli (.6).advise Receiver regarding same (.2).	Fates, Edward (Ted)	1.20	712.80	3,120.75	WO	HD	TR	_____
01/07/20	122451	Revise the draft joint stipulation as to Bank Direct loan, collateral per Receiver comments (.4).	Zaro, David	0.40	315.00	3,435.75	WO	HD	TR	_____
01/07/20	124362	Confer with counsel regarding release of lien on 301 D Street and review documents regarding the same (.2); transmit City National Bank records to the SEC (.2).	Aspis, Norman	0.40	162.00	3,597.75	WO	HD	TR	_____
01/08/20	33133	Communications with SEC counsel and W. Caldarelli regarding Supplemental Joint Motion re: ANI documents.	Fates, Edward (Ted)	0.40	237.60	3,835.35	WO	HD	TR	_____
01/08/20	122963	Work on the draft of the Bank Direct joint motion (.4). Follow-up on the joint motion and email to Bank Direct concerning the life insurance policy (.2). Research/analysis of prepayment premiums/fees, penalty issues, follow-up to assess potential issues (.7).	Zaro, David	1.30	1,023.75	4,859.10	WO	HD	TR	_____
01/09/20	117861	Communications with Receiver and S. Hoslett regarding compilation of investor contact information (.3); analyze documents produced by C. Riharb and advise on issues regarding claimed security interests (.4).	Fates, Edward (Ted)	0.70	415.80	5,274.90	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			
01/09/20	122745	Conference with counsel for Bank Direct, follow-up with regard to terms/motion and call (.4).	Zaro, David	0.40	315.00	5,589.90	WO	HD	TR	_____
01/10/20	122974	Advise on issues regarding EDD tax claim for Petaluma restaurant and steps to address same (.4); communications with Receiver and counsel for Champion-Cain regarding same (.2); advise Receiver as to claim asserted by prior ANI outside counsel (.2).	Fates, Edward (Ted)	0.80	475.20	6,065.10	WO	HD	TR	_____
01/13/20	30502	Advise Receiver on responses to unique investor inquiries.	Fates, Edward (Ted)	0.30	178.20	6,243.30	WO	HD	TR	_____
01/14/20	24542	Advise Receiver on investor inquiry regarding prior year 1099 issued and investor claim for severance pay.	Fates, Edward (Ted)	0.50	297.00	6,540.30	WO	HD	TR	_____
01/14/20	65623	Follow-up on Bank Direct agreement related to loan claims and address draft stipulation (.3). Address email/letter related to employee contract claim, follow-up emails (.4).	Zaro, David	0.70	551.25	7,091.55	WO	HD	TR	_____
01/15/20	61337	Analysis of offer letter and related documents relating to severance payment claim.	Thorbourne-Carlyle, Alana	0.80	406.80	7,498.35	WO	HD	TR	_____
01/15/20	65635	Follow-up to analyze the email and confer with labor counsel related to the claim for employment contract damages.	Zaro, David	0.40	315.00	7,813.35	WO	HD	TR	_____
01/15/20	65862	Analyze issues regarding stop payment complaint filed by contractor against lender	Fates, Edward (Ted)	0.30	178.20	7,991.55	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 on 301 D Street.	Timekeeper	Hours	Fees	Sum	Circle Action			
01/16/20	50796	Review/analysis of the TripCorp complaint, the attached stop notice/D Street preliminary notice/bond, research defenses and follow-up evaluation/memorandum (2.10). Follow-up on issues re West Sacramento project, city permit claims and negotiations, call with Receiver (.4). Email/call with Receiver/counsel related to the stop notice/SFG loan related issues (.6).	Zaro, David	3.10	2,441.25	10,432.80	WO	HD	TR	_____
01/17/20	52485	Evaluate/revise draft of the Bank Direct loan joint stipulation (.7). Call with counsel for Bank Direct related to the stipulation (.2). Call with counsel for Tricorp related to D Street project and stop notice action (.2).	Zaro, David	1.10	866.25	11,299.05	WO	HD	TR	_____
01/21/20	52433	Advise Receiver regarding former employee claim for severance pay (.3); communications with Receiver and counsel for ANICO (.2).	Fates, Edward (Ted)	0.50	297.00	11,596.05	WO	HD	TR	_____
01/21/20	64129	Email/follow-up on the wage claim employment contract (.4). Call with counsel related to claims issues/loans (.2).	Zaro, David	0.60	472.50	12,068.55	WO	HD	TR	_____
01/22/20	52644	Analyze protective order regarding ANI-related documents and advise Receiver regarding same.	Fates, Edward (Ted)	0.30	178.20	12,246.75	WO	HD	TR	_____
01/22/20	56440	Review letter from R. Kuhn regarding M. Spicer and teleconference regarding the same (.3).	Aspis, Norman	0.30	121.50	12,368.25	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		
01/23/20	57930	Call with Receiver and counsel for ANICO regarding Hancock property, estimate of value, mechanic's liens, and related issues (.5); follow up communications regarding appraisal (.2); communications with counsel for Chicago Title regarding protective order covering ANI-related documents and joint motion to amend same and amended proposed order (1.2); discuss same with Receiver (.4); communications with counsel for investor groups regarding same (.2); communications with counsel for SEC and counsel for investor groups regarding document sharing issues (.3).	Fates, Edward (Ted)	2.80	1,663.20	14,031.45	WO	HD	TR	_____
01/23/20	136334	Call to/from Schroeder related to Lewis claim/Keller property sale and status of prospective sale proceeds (.4). Call with counsel for SFG related to the stop notice claims of Tricorp (.3). Emails with counsel for TriCorp related to mechanic's lien/extension of credit (.3),	Zaro, David	1.00	787.50	14,818.95	WO	HD	TR	_____
01/24/20	62985	Meet and confer with counsel for SEC and counsel for investor groups regarding sharing of ANI-related documents.	Fates, Edward (Ted)	0.70	415.80	15,234.75	WO	HD	TR	_____
01/27/20	51216	Calls with the Receiver and counsel related to loan issues, strategy for negotiations, law concerning pre-payment premium for Symetra (.4).	Zaro, David	0.40	315.00	15,549.75	WO	HD	TR	_____
01/27/20	57906	Confer with Receiver and SEC counsel regarding ANI document sharing issues (.4); communications with W. Caldarelli regarding same (.2).	Fates, Edward (Ted)	0.60	356.40	15,906.15	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			
01/28/20	121346	Confer with counsel regarding W. Adams and potential claims (.3).	Aspis, Norman	0.30	121.50	16,027.65	WO	HD	TR	_____
01/28/20	121347	Confer with counsel regarding upcoming production of bank records to investors (.2).	Aspis, Norman	0.20	81.00	16,108.65	WO	HD	TR	_____
01/28/20	132497	Email related to the Bank Direct life insurance stipulation and call with counsel (.3). Review/revise the joint stipulation/motion and emails to follow-up with counsel (.6). Prepare memorandum related claims associated with D Street property per Receiver email (.4).	Zaro, David	1.30	1,023.75	17,132.40	WO	HD	TR	_____
01/28/20	136431	Analyze scope of document sharing, process for same, and potential costs (.6); discuss same with Receiver and G. Rodriguez (.3).	Fates, Edward (Ted)	0.90	534.60	17,667.00	WO	HD	TR	_____
01/29/20	52587	Work on detailed response to W. Caldarelli meet and confer correspondence and list of ANI documents to be shared (2.3); discuss same and document sharing issues/timing with Receiver and G. Rodriguez (1.3); confer with SEC counsel regarding same (.2); analyze issues raised by counsel for Merit Financial regarding CA Opportunity License Fund (.3); discuss same with Receiver (.4); call with counsel for Merit Financial regarding issues relating to CA Opportunity License Fund and claims against Chicago Title (.6).	Fates, Edward (Ted)	5.10	3,029.40	20,696.40	WO	HD	TR	_____
01/29/20	136975	Call with the Receiver and counsel re D Street, mechanics liens, stop notice (.2).	Zaro, David	0.20	157.50	20,853.90	WO	HD	TR	_____

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Trans Date	Index	Description of Service Rendered	Timekeeper	Hours	Fees	Sum	Circle Action			
01/30/20	132103	Further correspondence with counsel for investor groups regarding document sharing issues and concerns regarding investor contact list and Chicago Title direct contact with investors (1.1); analyze and advise on email search protocols, production issues, and potential costs (.9); communications with Receiver and SEC counsel regarding same (.4); analyze letter and payoff statement from counsel for servicer of loan on Carmel property (.3); advise Receiver regarding same (.1).	Fates, Edward (Ted)	2.80	1,663.20	22,517.10	WO	HD	TR	_____
01/31/20	54092	Confer with counsel and S. Peng regarding production from JPMorgan Chase; review documents in anticipation of production regarding the same (.5).	Aspis, Norman	0.50	202.50	22,719.60	WO	HD	TR	_____
01/31/20	132631	Review/revise draft Bank Direct agreements, email to counsel (.4). Evaluate the draft Bank Direct order (.2). Analysis of further issues related to claims, mechanic liens and stop notice re D Street project (.4). Evaluate the letters from SPS loan servicing demanding payment and review of emails (.2).	Zaro, David	1.20	945.00	23,664.60	WO	HD	TR	_____
01/31/20	136914	Communications with Receiver regarding ANI-document sharing issues (.4); advise on protocol and next steps regarding same (.2); communications with counsel for Champion-Cain regarding ANI document sharing and privilege issues raised by Champion-Cain (.3).	Fates, Edward (Ted)	0.90	534.60	24,199.20	WO	HD	TR	_____

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02/03/20	7994179	Advise on issues regarding documents to be shared (.9); communications with Receiver and G. Rodriguez regarding same (.4); communications with counsel for investors regarding same (.1); revise communications regarding shared documents (.2).	Fates, Edward (Ted)	1.60	950.40	25,149.60	WO	HD	TR	_____
02/03/20	7994966	Review production to certain investors, oversee production issues, and transmit the same to investors (1).	Aspis, Norman	1.00	405.00	25,554.60	WO	HD	TR	_____
02/03/20	7995064	Further research/analysis of the issues concerning pre-payment penalty calculations/defenses (.6)	Zaro, David	0.60	472.50	26,027.10	WO	HD	TR	_____
02/03/20	7995124	Review and assess calculation of prepayment fee for 4445 Lamont St., and confer with counsel re: the same (0.6).	Hsu, Tim	0.60	313.20	26,340.30	WO	HD	TR	_____
02/04/20	7996091	Review complaint filed in San Diego Superior Court by subcontractor on 3515 Hancock Street and prepare correspondence to counsel for subcontractor regarding same and litigation stay (.8); call with counsel for subcontractor regarding same (.2); address issues and communications from counsel for investor groups regarding access to ANI shared documents (.3); call with Receiver and counsel for ANICO regarding loan on Hancock street, mechanic's liens, and related issues (.3).	Fates, Edward (Ted)	1.60	950.40	27,290.70	WO	HD	TR	_____
02/04/20	7996553	Attention to technological issues in connection with production of bank records	Aspis, Norman	0.30	121.50	27,412.20	WO	HD	TR	_____

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02/05/20	7996703	Call with counsel for Tricorp claimant as to D Street Project/stop notice lien issues (.2). Follow-up on the call to review the stop notice, the extension of credit and emails to Receiver/counsel to address extensions and overall strategy (.9).	Zaro, David	1.10	866.25	28,278.45	WO	HD	TR	_____
02/05/20	7996875	Analyze issues raised in correspondence from W. Caldarelli concerning attorney R. Houts and respond to same (.4); communications with Receiver and counsel for J. Lance (.3); analyze document sharing issues raised by B. Galdston and discuss same with Receiver (.6).	Fates, Edward (Ted)	1.30	772.20	29,050.65	WO	HD	TR	_____
02/06/20	7998645	Email/call with Receiver related to Himmelberg and Lamont loans (.4).	Zaro, David	0.40	315.00	29,365.65	WO	HD	TR	_____
02/06/20	7998808	Analyze issues regarding protective order regarding investor contact information and advise Receiver regarding same (.4); communications with counsel for investors regarding same (.2); prepare language for website posting and email blast to investors (.5); communications with Receiver and counsel for investors regarding email searching and cost issues (.4); advise G. Rodriguez on approach to EDD lien on Tennyson Street property (.3).	Fates, Edward (Ted)	1.80	1,069.20	30,434.85	WO	HD	TR	_____
02/07/20	7999104	Communications with SEC counsel regarding posting/message to investors regarding contact list and opt-out (.3); discuss web posting/message to investors	Fates, Edward (Ted)	2.40	1,425.60	31,860.45	WO	HD	TR	_____

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		and timing of sharing investor list with Receiver (.4); revisions to same (.2); call with counsel for ANICO regarding loan on Hancock property and resolution of issues regarding same (.3); discuss transmission of .pst email files for document sharing purposes with G. Rodriguez (.3); address issues regarding same (.2); discuss document sharing regarding escrow agreements with Receiver (.2); call with counsel for Ovation Finance regarding document sharing, third party claims, fraudulent transfers and related issues (.5).								
02/10/20	8000863	Analyze issues regarding law firm claim for transition-related work (.4); communications with law firm regarding same (.2); address issues regarding vendor payment demand and response to same (.3); advise Receiver on issues regarding Symetra loan (.2).	Fates, Edward (Ted)	1.10	653.40	32,513.85	WO	HD	TR	_____
02/10/20	8000975	Research whether a law firm may bill for administrative expenses associated with closing a client's file.	Williams, Rebecca	1.30	391.95	32,905.80	WO	HD	TR	_____
02/10/20	8001311	Address emails related to the D Street claims/Stop Notice and mechanic's liens (.5). Call with Receiver related to PacWest and First Choice loans, advice as to the strategy (.4). Calls with the Receiver and counsel related to Symetra loan, advice re loan terms/negotiations (.4).	Zaro, David	1.30	1,023.75	33,929.55	WO	HD	TR	_____
02/11/20	8001547	Analyze ANI document sharing issues re: email filtering (.3) discuss same with Receiver (.2) confer with counsel for	Fates, Edward (Ted)	1.80	1,069.20	34,998.75	WO	HD	TR	_____

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		investors re: same (.4) confer with counsel for Champion-Cain re: same (.3) advise Receiver on issues/communications with Symetra (.4) follow up communications with subcontractor re: SD Superior Court action and litigation stay (.2)							
02/11/20	8001562	Call with Receiver related to the Symetra loan terms/negotiations (.2). Emails with Receiver and SEC re Bank Direct stipulation, follow-up concerning joint motion (.4). Call with counsel related to loan/D Street claims (.2).	Zaro, David	0.80	630.00	35,628.75	WO	HD	TR
02/12/20	8002847	Email/call with Receiver and analyze the D Street Project issues, strategy to address negotiations with the City and lenders (.4). Call with Receiver and counsel re Symetra loan negotiations (.3). Email/draft memoranda concerning the D Street loan, the liens/stop notice and strategy in light of anticipated litigation (.9).	Zaro, David	1.60	1,260.00	36,888.75	WO	HD	TR
02/12/20	8003422	Call/emails with Receiver, J. Lance and counsel for J. Lance re: issues relating to claims/interests in 809 San Rafael and 812 San Rafael (.8) discuss same and strategy with Receiver (.3) analyze issues raised re: claimed interest in 812 San Rafael (.7) advise Receiver re: same (.2) advise on gathering/scanning of escrow agreements for ANI document sharing (.3) communications with B. Galdston re: costs for document sharing (.2)	Fates, Edward (Ted)	2.50	1,485.00	38,373.75	WO	HD	TR

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02/12/20	8003468	Research in active concert provision of FRCP 65.	Williams, Rebecca	0.80	241.20	38,614.95	WO	HD	TR	_____
02/13/20	8004018	Various communications with counsel for investor groups re: document sharing and cost issues (.7) discuss same with Receiver and L. Ryan (.3) respond to investor inquiry re: investor contact list (.2) advise on email search and filtering protocols (.4)	Fates, Edward (Ted)	1.60	950.40	39,565.35	WO	HD	TR	_____
02/13/20	8004707	Conduct research re. in active concert provision of FRCP 65.	Williams, Rebecca	0.80	241.20	39,806.55	WO	HD	TR	_____
02/14/20	8005157	Respond to inquiries from counsel for Edelman investors re: document sharing (.2) communications with W. Caldarelli, counsel for CalPrivate Bank and counsel for Chicago Title re: production costs, timing, and correction to protective order (.7) advise on next steps re: email search/extraction (.3) revisions to draft letter to EDD re: payroll tax issues and release of lien (.3) discuss same with G. Rodriguez (.2) communications re: filing of amended protective order re: ANI-related documents (.2)	Fates, Edward (Ted)	1.90	1,128.60	40,935.15	WO	HD	TR	_____
02/18/20	8006974	Communications from Edelman Investors re: ANI document sharing costs (.3) communications with Receiver and counsel for ANICO re: issues with loan on Hancock Street property (.7) communications with counsel for CalPrivate Bank re: document sharing, escrow agreements and insurance coverage issues (.3) discuss issues with SFG loan on University Ave. property with	Fates, Edward (Ted)	1.50	891.00	41,826.15	WO	HD	TR	_____

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02/18/20	8007432	Call with SEC counsel re BankDirect joint motion meet/confer, follow-up emails with BankDirect (.4). Follow-up with counsel concerning the BankDirect order/notice (.3).	Zaro, David	0.70	551.25	42,377.40	WO	HD	TR _____
02/19/20	8007914	Communications with Receiver re: document sharing costs and investor payments (.2) advise on issues re: Bank Direct joint motion filing (.2) calls/emails with Receiver and counsel for ANICO re: loan on Hancock property and related issues (.6) call from counsel for D. DuCharme re: access to ANI-shared documents (.3) calls/emails with Receiver and counsel for SFG re: loan on University Ave. property and related issues (.8) communications with investors re: investor contact list (.2)	Fates, Edward (Ted)	2.30	1,366.20	43,743.60	WO	HD	TR _____
02/19/20	8008850	Email/call with counsel for BankDirect concerning the joint motion (.4). Call with counsel as to pending lender dispute issues and Receiver's strategy as to troubled projects (.3). Work on preparation of joint motion for filing, follow-up with counsel and Receiver (.7).	Zaro, David	1.40	1,102.50	44,846.10	WO	HD	TR _____
02/20/20	8009245	Work with Receiver counsel and call related to BankDirect joint motion (.4). Call with counsel at BankDirect related to motion/hearing (.3).	Zaro, David	0.70	551.25	45,397.35	WO	HD	TR _____
02/20/20	8009273	Address email searching/filtering issues for ANI-related document sharing (.4) discuss	Fates, Edward (Ted)	1.10	653.40	46,050.75	WO	HD	TR _____

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		opt outs for investor contact sharing with A. Herren (.2) communications with counsel for Edelman investors and counsel for Ovation re: document sharing costs (.3) discuss ANI document scanning project with Receiver (.2)							
02/20/20	8010035	Conference, analysis and exchange of e-mails re: investor communications issue.	Farrell, Michael	0.20	143.10	46,193.85	WO	HD	TR
02/21/20	8010223	Follow-up on the court's order related to Bank Direct, call with counsel concerning the order (.4).	Zaro, David	0.40	315.00	46,508.85	WO	HD	TR
02/21/20	8011068	Communications with counsel for Edelman investors and counsel for Champion-Cain re: ANI email sharing issues (.8) advise Receiver on UCC statements and related issues for Symetra loan on Lamont property (.6) conference call/emails with Receiver and counsel for ANICO re: loan on 3768 Mission and sale process (.7) discuss issues re: J. Lance claims with Receiver (.2) address email search/filtering issues for ANI document sharing (.4) communications with counsel for K. Peterson re: document sharing costs (.1)	Fates, Edward (Ted)	2.80	1,663.20	48,172.05	WO	HD	TR
02/23/20	8011298	Revise correspondence to Symetra re: issues with loan on Patio on Lamont property	Fates, Edward (Ted)	0.40	237.60	48,409.65	WO	HD	TR
02/24/20	8011682	Respond to investor inquiry re: investor contact list and opt out (.2) work on correspondence to J. Lance re: 812 San Rafael issues (.5) discuss same with	Fates, Edward (Ted)	2.60	1,544.40	49,954.05	WO	HD	TR

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		Receiver (.2) address issues with investor opt outs (.4) advise Receiver on Symetra loan issues (.1) analyze and advise Receiver on issues re: data and sources for investor contact list (.3) advise on cost-sharing issues and production of ANI-related documents (.4) communications with Receiver and L. Ryan re: same (.2) communications with counsel for CalPrivate Bank re: document sharing (.1) communications with SEC counsel re: investor opt-outs (.2)								
02/24/20	8011702	Revise the BankDirect order related to joint motion to grant relief from injunction (.4). Call/advice to counsel related to the BankDirect order (.2).	Zaro, David	0.60	472.50	50,426.55	WO	HD	TR	_____
02/25/20	8012910	Draft transmittal email to recipients of ANI-related emails and confer with counsel and S. Peng regarding the same (.4); confer with counsel regarding W. Adams issues (.2).	Aspis, Norman	0.60	243.00	50,669.55	WO	HD	TR	_____
02/25/20	8013567	Discuss status of offer on 809 San Rafael with Receiver (.2) communications with J. Lance and counsel re: same (.2) discuss scope/timing on ANI escrow and investor-related documents for sharing with Receiver (.4) communications with Receiver and SEC counsel re: opt-outs for investor contact info sharing (.3) communications with counsel for K. Peterson and counsel for Merit Financial re: document sharing costs (.4) advise Receiver on issues with SFG loan (.2) analyze and advise on	Fates, Edward (Ted)	2.70	1,603.80	52,273.35	WO	HD	TR	_____

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		correspondence from Symetra and response to same (.6) analyze and advise on reconciliation of investor contact list and opt-out list (.4)								
02/25/20	8013589	Conference with counsel concerning BankDirect order and filing per Court Order (.2). Evaluate the issues related to Symetra loan, letter and call with the Receiver re workout strategy (.5).	Zaro, David	0.70	551.25	52,824.60	WO	HD	TR	_____
02/26/20	8013622	Address issues raised in correspondence re: ANICO loan on Saska's restaurant property and parking lot (.2) work on response to correspondence from Symetra (.4) discuss same with Receiver (.2) communications with counsel for K. Peterson re: access to shared ANI documents (.1) respond to inquiry from investor re: investor contact list (.2)	Fates, Edward (Ted)	1.10	653.40	53,478.00	WO	HD	TR	_____
02/26/20	8014686	Confer with counsel, S. Peng, and investor counsel regarding recent production of ANI-related emails (.5).	Aspis, Norman	0.50	202.50	53,680.50	WO	HD	TR	_____
02/27/20	8015393	Advise Receiver on issues re: gathering escrow agreements and related investor documents for ANI document sharing (.3) discuss issues and next steps re: Symetra loan with Receiver (.6) Calls/emails with counsel for Symetra re: same (1.1) respond to inquiry from counsel for D. DuCharme re: ANI-shared documents (.2) advise on reconciliation of investor contact list and opt-out list (.4) review same (.3)	Fates, Edward (Ted)	2.90	1,722.60	55,403.10	WO	HD	TR	_____

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02/27/20	8015462	Analysis of several emails/letter from Symetra re loan and call with Receiver, advice as to response and loan workout.	Zaro, David	0.60	472.50	55,875.60	WO	HD	TR	_____
02/28/20	8015811	Address issues re: investor contact list (less opt-outs) and transmission of same (.8) address inquiry from First Choice Bank re: Valle Vista property and analyze claim on security interest on liquor license (.6) discuss issues re: Symetra loan and Patio on Lamont restaurant property with Receiver (.3)	Fates, Edward (Ted)	1.70	1,009.80	56,885.40	WO	HD	TR	_____
02/28/20	8023158	Analysis of the Symetra loan issues/email follow-up and call re terms (.4). Analysis and call related to the issues of First Choice as to liquor license/UCC issues (.4). Several emails to follow-up on the D Street liens/stop notice (.4).	Zaro, David	1.60	1,260.00	58,145.40	WO	HD	TR	_____
03/02/20	8022948	Address investor requests for investor contact list, communications with A. Herren re: same (.4) analyze and respond to labor claims received from Labor Commissioner's Office (.5) correspondence re: same (.4) advise Receiver on correspondence with ANICO re: issues with loans and collateral properties (.3)	Fates, Edward (Ted)	1.60	950.40	59,095.80	WO	HD	TR	_____
03/02/20	8025483	Research/analysis related to FirstChoice claims, liquor license as to Fireside (1.3). Several emails/follow-up related to tolling agreement associated with stop notice and lien claims of TriCorp/SFG (.6).	Zaro, David	1.90	1,496.25	60,592.05	WO	HD	TR	_____

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03/03/20	8026290	Respond to inquiries from counsel for CalPrivate Bank re: J. Lance claims and claims process	Fates, Edward (Ted)	0.20	118.80	60,710.85	WO	HD	TR	_____
03/04/20	8026797	Respond to inquiries from counsel for Edelman investors (.2) discuss gathering/scanning of escrow agreements for ANI document sharing purposes and email production costs with Receiver (.3) discuss Symetra loan issues with Receiver (.2) communications with counsel for Ikonc Builders re: notice of stay filed in state court action (.3) update Receiver re: same (.1)	Fates, Edward (Ted)	1.10	653.40	61,364.25	WO	HD	TR	_____
03/04/20	8028200	Follow-up on TriCorop mechanics lien/stop notice issues per call with Receiver (.2). Follow-up on several emails concerning TriCorp and SGH issues and assess stop notice issues/pending lawsuit(.8). Email, address BankDirect order (.3). Several emails and evaluate SEC comments to the claims process, follow-up call with the Receiver (1.8).	Zaro, David	3.10	2,441.25	63,805.50	WO	HD	TR	_____
03/05/20	8028150	Discuss strategy and next steps re: Symetra loan issues with Receiver	Fates, Edward (Ted)	0.40	237.60	64,043.10	WO	HD	TR	_____
03/05/20	8029136	Call with Receiver concerning SFG-TriCorp matter, lender, mechanic's liens and workout issues (.2). Research concerning mechanic's liens and stop notices, claims/credit extension issues (.7). Call with Kirby related to the mechanic's lien/stop notice issues and workout prospects (.6). Call regarding TriCorp lien claims (.2). Call concerning Symetra with	Zaro, David	1.90	1,496.25	65,539.35	WO	HD	TR	_____

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		counsel as to workout (.2).							
03/06/20	8028901	Analyze issues re: SBA loan issued to Swell Coffee, discuss same with Receiver (.6) discuss Symetra loan issues with Receiver, assist in preparing correspondence to Symetra re: agreement on short sale terms (.9) communications with counsel for Symetra re: same (.2) discuss escrow agreements and related investor agreements for ANI document sharing with Receiver (.4) call with counsel for Schmidt Fire re: claim on Hancock Street property (.2) advise Receiver re: same (.1)	Fates, Edward (Ted)	2.40	1,425.60	66,964.95	WO	HD	TR
03/06/20	8031599	Analysis of further issues related to the TriCorp and SFG claims, further analysis of the SFG loan documents and stop notice.	Zaro, David	0.80	630.00	67,594.95	WO	HD	TR
03/09/20	8032478	Review lien release from architectural firm re: Carmel property and advise G. Rodriguez re: same (.2) advise on ANI document sharing issues (.2) review loan and UCC documents for SBA loan on Swell Coffee equipment (.3) advise Receiver re: same (.2) communications with counsel for D. DuCharme re: document sharing issues (.3) communications with Labor Commissioner's office re: employee labor claims (.4) communications with counsel for SPS re: loan on Carmel property and anticipated closing (.3) analyze and discuss issues/status re: SFG loans and subject properties with Receiver (.4)	Fates, Edward (Ted)	2.30	1,366.20	68,961.15	WO	HD	TR

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03/09/20	8032902	Call/email related to TriCorp and SFG, follow-up with Mr. Perrot (.4). Evaluate the issues related to TriCorp extension of credit, stop notice and evaluate the legal foundation for the claims (.5).	Zaro, David	0.90	708.75	69,669.90	WO	HD	TR	
03/10/20	8031699	Communications with M. Kirby, W. Caldarelli, and J. Ryan re: ANI document sharing and costs re: same (.4) revisions to case update for investors and creditors for website/email distribution (1.1) discuss same with Receiver (.3) assist Receiver with letter to EDD re: payroll tax claim and associated lien (.4)	Fates, Edward (Ted)	2.20	1,306.80	70,976.70	WO	HD	TR	
03/10/20	8033000	Analysis of the SFG and TriCorp issues as to D Street project, email/advice to the Receiver, follow-up with further emails with counsel and Receiver concerning strategy (.8).	Zaro, David	0.80	630.00	71,606.70	WO	HD	TR	
03/11/20	8032562	Respond to inquiries from counsel for J. Hanson and R. Bond re: access to ANI-related documents (.4) address issues re: document sharing (.3) advise Receiver re: same (.2) advise Receiver on issues re: resolution of EDD claim/lien (.2) address issues re: claims asserted by former employee and correspondence re: same (.3) discuss same with Receiver (.1) communications with counsel for ANICO (.2) communications with counsel for D. DuCharme re: document sharing and costs (.2)	Fates, Edward (Ted)	1.90	1,128.60	72,735.30	WO	HD	TR	

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03/11/20	8034417	Address the "D" Street project lender/lien claimant issues with the Receiver (.2). Follow-up email with TriCorp counsel and Receiver (.2).	Zaro, David	0.40	315.00	73,050.30	WO	HD	TR	_____
03/12/20	8033780	Call/emails with counsel for ANICO re: loans and collateral properties (.6) communications with counsel for J. Hanson and R. Bond re: attorney-client privilege issues (.2)	Fates, Edward (Ted)	0.80	475.20	73,525.50	WO	HD	TR	_____
03/12/20	8037224	Evaluate the claims/cross-claims and develop legal memo addressing the rights of the parties, advice relate to negotiations regarding development.	Zaro, David	0.70	551.25	74,076.75	WO	HD	TR	_____
03/13/20	8034787	Discuss issues re: EDD lien release with Receiver (.2) review and discuss revisions to monthly case update to investors with Receiver (.3) revise letter to counsel for former employee re: claim (.1)	Fates, Edward (Ted)	0.60	356.40	74,433.15	WO	HD	TR	_____
03/13/20	8037750	Email related to TriCorp claim, D Street property and extension of credit.	Zaro, David	0.20	157.50	74,590.65	WO	HD	TR	_____
03/17/20	8037394	Advise on issues re: ANI document sharing costs (.2) communications with Receiver re: same (.1)	Fates, Edward (Ted)	0.30	178.20	74,768.85	WO	HD	TR	_____
03/18/20	8038348	Respond to inquiries from W. Caldarelli re: investor contact list (.2) advise Receiver on pre-receivership creditor claim (.1)	Fates, Edward (Ted)	0.30	178.20	74,947.05	WO	HD	TR	_____
03/18/20	8041494	Analysis of the proposal to purchase the D Street project (.3). Conference with counsel and Receiver, related to the prospective D	Zaro, David	1.10	866.25	75,813.30	WO	HD	TR	_____

08/05/20 20:52:49 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			
		Street development proposal, advice as to negotiations (.8).								
03/19/20	8039258	Respond to inquiries from counsel for investors and counsel for J. Hanson and R. Bond re: ANI document sharing costs (.4) communications with L. Ryan re: same (.2)	Fates, Edward (Ted)	0.60	356.40	76,169.70	WO	HD	TR	_____
03/20/20	8040599	Respond to direct inquiry from investor re: claims process and distributions (.2) address ANI document sharing issues (.2)	Fates, Edward (Ted)	0.40	237.60	76,407.30	WO	HD	TR	_____
03/23/20	8041816	Communications with Receiver and counsel for ANICO re: ANICO claims and collateral properties (.3) address inquiry from W. Caldarelli re: ANI shared documents (.2) communications with Receiver re: same (.2) respond to inquiry from counsel for Allreds re: investor opt-outs (.2)	Fates, Edward (Ted)	0.90	534.60	76,941.90	WO	HD	TR	_____
03/23/20	8046509	Evaluate the letter from counsel for Adam Lewis, Bishop-Barry and claims related to Keller property (.3). Call with Receiver related to Keller Street property/claimant (.2). Call concerning the D Street/SFG claim/possible workout options and follow-up with counsel (.3).	Zaro, David	0.80	630.00	77,571.90	WO	HD	TR	_____
03/24/20	8043065	Call with counsel for ANICO and Receiver re: ANICO loans on Hancock, Saska's, owned parking lot, and Surf Rider LM (.5) advise Receiver re: strategy as to loan on Hancock property (.2) follow up communications with counsel for ANICO re: same (.3) address issues re: former ANI employee's worker's comp claim (.2)	Fates, Edward (Ted)	1.20	712.80	78,284.70	WO	HD	TR	_____

08/05/20 20:52:49 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			
03/25/20	8044004	Analyze issues raised and respond to inquiries from W. Caldarelli re: bank records and document sharing (.8) discuss same with Receiver (.3) communications with C. Mariam re: document sharing costs (.2)	Fates, Edward (Ted)	1.30	772.20	79,056.90	WO	HD	TR	_____
03/26/20	8045207	Communications with A. Herren re: payment for cost sharing for ANI-related documents	Fates, Edward (Ted)	0.20	118.80	79,175.70	WO	HD	TR	_____
03/27/20	8046339	Communications with Receiver and counsel for ANICO re: possible stipulation re: relief to pursue foreclosure	Fates, Edward (Ted)	0.40	237.60	79,413.30	WO	HD	TR	_____
03/27/20	8048003	Several emails with TriCorp, review of agreements, follow-up email with Receiver (.4).	Zaro, David	0.40	315.00	79,728.30	WO	HD	TR	_____
03/30/20	8051351	Confer with S. Peng regarding production of ANI-related documents, and transmit new link to specific recipient (.4).	Aspis, Norman	0.40	162.00	79,890.30	WO	HD	TR	_____
03/31/20	8049205	Respond to inquiries from counsel for investors relating to CTC and document subpoenas (.3) Communications with counsel for ANICO re: loan secured by parking lot property and potential stipulation re: loan secured by Hancock property (.4) communications with L. Ryan re: ANI document sharing costs (.1)	Fates, Edward (Ted)	0.80	475.20	80,365.50	WO	HD	TR	_____

Proforma Summary

Timekeeper Number	Timekeeper	Hours	Rate	Amounts
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08/05/20 20:52:49 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
000313	Zaro, David	39.30	787.50	30,948.75
000739	Farrell, Michael	0.20	715.50	143.10
001665	Fates, Edward (Ted)	77.20	594.00	45,856.80
002055	Hsu, Tim	0.60	522.00	313.20
002094	Thorbourne-Carlyle, Alana	0.80	508.50	406.80
002348	Williams, Rebecca	2.90	301.50	874.35
002369	Aspis, Norman	4.50	405.00	1,822.50
		<u>125.50</u>		<u>\$80,365.50</u>
Subtotal Fees				\$80,365.50
Discount				0.00
Total Fees				80,365.50
Total Disbursements				0.00

Attorney Billing Instructions

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

Billing Instructions

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

Account Summary – As Of 08/05/20

	Fiscal YTD			Calendar YTD			LTD		
	Total	Fees	Disb.	Total	Fees	Disb.	Total	Fees	Disbursements
Worked	21,179.25	21,179.25	0.00	141,052.95	141,052.95	0.00	80,365.50	80,365.50	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	143,666.55	143,666.55	0.00						
Balance									
AR Balance	0.00	0.00	0.00						

08/05/20 20:52:49 PROFORMA STATEMENT FOR MATTER 378827.00006 (Krista Freitag, as Receiver for ANI Deve) (SEC v. Champion-Cain - Claims & Distribu)

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

}

08/05/20 20:52:53 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: 1048841

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	
01/08/20	33132	Communications with local counsel in FL and Receiver regarding SunTrust matter.	Fates, Edward (Ted)	0.20	118.80	118.80	WO	HD	TR
01/09/20	117859	Communications with ANI's former outside counsel regarding SunTrust matter (.2); advise Receiver regarding negotiations with co-plaintiffs in SunTrust matter regarding terms of engagement agreement with local counsel in FL (.7).	Fates, Edward (Ted)	0.90	534.60	653.40	WO	HD	TR
01/10/20	122972	Communications with local counsel in FL regarding summary judgment motion filed in SunTrust case and next steps regarding same (.2); advise Receiver regarding same (.1); communications with counsel for co-plaintiff regarding terms of engagement agreement for FL counsel and payment waterfall for potential recovery (.6); advise Receiver regarding same (.5).	Fates, Edward (Ted)	1.40	831.60	1,485.00	WO	HD	TR
01/13/20	30500	Communications with counsel for co-plaintiffs regarding proposed agreement on	Fates, Edward (Ted)	0.90	534.60	2,019.60	WO	HD	TR

08/05/20 20:52:53 PROFORMA STATEMENT FOR MATTER 378827.00008 (Krista Freitag, as Receiver for ANI Deve) (SEC v. Champion-Cain - Pending Litigatio)

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

Trans Date	Index	Description of Service Rendered	Timekeeper	Hours	Fees	Sum	Circle	Action	
		allocation of prospective recovery in SunTrust case (.4); advise Receiver regarding same (.3); communications with local counsel in FL (.2).							
01/14/20	24547	Follow up communications with counsel for co-plaintiff in SunTrust case regarding terms of engagement and allocation of prospective recovery.	Fates, Edward (Ted)	0.20	118.80	2,138.40	WO	HD	TR
01/15/20	65859	Analyze issues regarding co-plaintiff objections to allocation of potential recovery in SunTrust case (.6); communications regarding same (.3).	Fates, Edward (Ted)	0.90	534.60	2,673.00	WO	HD	TR
01/17/20	55224	Further discussions/negotiations with co-plaintiff in SunTrust matter regarding terms of proposed engagement of local counsel and allocation of potential litigation recovery (.3); communications with local counsel regarding same (.2).	Fates, Edward (Ted)	0.50	297.00	2,970.00	WO	HD	TR
01/21/20	52449	Call with local counsel in FL on SunTrust matter and engagement agreement.	Fates, Edward (Ted)	0.20	118.80	3,088.80	WO	HD	TR
01/24/20	62984	Further communications with co-plaintiff regarding terms of engagement of Florida counsel and allocation/split of prospective recovery (.3); advise Receiver regarding same (.1).	Fates, Edward (Ted)	0.40	237.60	3,326.40	WO	HD	TR
01/28/20	136419	Communications with co-plaintiff regarding engagement terms for SunTrust case (.3); advise Receiver regarding same (.2); revisions to proposed engagement agreement (.5); communications with local	Fates, Edward (Ted)	1.20	712.80	4,039.20	WO	HD	TR

08/05/20 20:52:53 PROFORMA STATEMENT FOR MATTER 378827.00008 (Krista Freitag, as Receiver for ANI Deve) (SEC v. Champion-Cain - Pending Litigatio)

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

Trans Date	Index	Description of Service Rendered	Timekeeper	Hours	Fees	Sum	Circle	Action	
		counsel in FL regarding same (.2).							
01/30/20	132102	Communications with local counsel in FL regarding issues with co-plaintiff and proposed engagement agreement (.3); call with counsel for co-plaintiff regarding same (.4).	Fates, Edward (Ted)	0.70	415.80	4,455.00	WO	HD	TR _____
02/05/20	7996867	Communications with counsel in FL regarding SunTrust matter (.4); revisions to proposed engagement agreement (.3).	Fates, Edward (Ted)	0.70	415.80	4,870.80	WO	HD	TR _____
02/06/20	7998609	Work on motion to approve engagement of local counsel in FL for SunTrust matter.	Fates, Edward (Ted)	1.80	1,069.20	5,940.00	WO	HD	TR _____
02/07/20	7999345	Discuss information needed on prior payments for legal fees and costs in SunTrust case with Receiver (.2); communications with local counsel in FL regarding same (.1).	Fates, Edward (Ted)	0.30	178.20	6,118.20	WO	HD	TR _____
02/10/20	8000833	Gather information from local counsel in FL regarding prior payments of legal fees and costs, prior settlements, etc.	Fates, Edward (Ted)	0.80	475.20	6,593.40	WO	HD	TR _____
02/11/20	8001715	Work on motion to approve engagement of GJB as local counsel in FL for SunTrust litigation	Fates, Edward (Ted)	0.70	415.80	7,009.20	WO	HD	TR _____
02/12/20	8003795	Follow up communications with FL counsel re: prior payments and reconciliation of same for engagement agreement in SunTrust matter	Fates, Edward (Ted)	0.40	237.60	7,246.80	WO	HD	TR _____
02/13/20	8004121	Revisions to engagement agreement re: prior advances to be reimbursed from	Fates, Edward (Ted)	0.60	356.40	7,603.20	WO	HD	TR _____

08/05/20 20:52:53 PROFORMA STATEMENT FOR MATTER 378827.00008 (Krista Freitag, as Receiver for ANI Deve) (SEC v. Champion-Cain - Pending Litigatio)

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

Trans Date	Index	Description of Service Rendered	Timekeeper	Hours	Fees	Sum	Circle	Action	
		prospective recovery in SunTrust case, discuss same with Receiver							
02/19/20	8008385	Communications with Receiver and Florida counsel re: total of prior advances to be reimbursed through prospective recovery in SunTrust matter	Fates, Edward (Ted)	0.40	237.60	7,840.80	WO	HD	TR _____
02/20/20	8009752	Revisions to motion to engage special litigation counsel in FL for SunTrust case (.6) discuss same with Receiver (.2)	Fates, Edward (Ted)	0.80	475.20	8,316.00	WO	HD	TR _____
02/24/20	8012205	Revisions to motion to engage local counsel in FL for SunTrust Action (.5) discuss same with Receiver and local counsel in FL (.3)	Fates, Edward (Ted)	0.80	475.20	8,791.20	WO	HD	TR _____
02/26/20	8013724	Communications with local counsel in FL re: motion to authorize engagement (.2) work on Receiver declaration, notice of motion and proposed order (.9)	Fates, Edward (Ted)	1.10	653.40	9,444.60	WO	HD	TR _____
02/27/20	8022486	Meet and confer communications with SEC counsel re: motion to engage FL counsel for SunTrust action (.3) communications with local counsel in FL (.1)	Fates, Edward (Ted)	0.40	237.60	9,682.20	WO	HD	TR _____
03/02/20	8026172	Telephone conference with Attorney Aspis to discuss Chicago Title document review strategy.	Williams, Rebecca	0.30	90.45	9,772.65	WO	HD	TR _____
03/03/20	8025477	Confer with SEC counsel re: motion to engage special counsel in FL for SunTrust case (.3) work on stipulation to continue status conference in pending Luu case in SD Superior Court (.4) communications with counsel for Luu re: same (.2)	Fates, Edward (Ted)	0.90	534.60	10,307.25	WO	HD	TR _____

08/05/20 20:52:53 PROFORMA STATEMENT FOR MATTER 378827.00008 (Krista Freitag, as Receiver for ANI Deve) (SEC v. Champion-Cain - Pending Litigatio)

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

Trans Date	Index	Description of Service Rendered	Timekeeper	Hours	Fees	Sum	Circle Action			
03/04/20	8026936	Revisions to Receiver declaration in support of motion to engage FL counsel (.2) discuss same with Receiver (.1) call to law clerk re: hearing date for motion (.1) finalize motion papers (.2) advise FL counsel re: status (.1)	Fates, Edward (Ted)	0.80	475.20	10,782.45	WO	HD	TR	_____
03/06/20	8028906	Communications with local counsel in FL re: motion for summary judgment filed by SunTrust and timing of motion to authorize engagement	Fates, Edward (Ted)	0.20	118.80	10,901.25	WO	HD	TR	_____
03/09/20	8030320	Communications with counsel for Luu in pending state court action re: stipulation to continue status conference (.4) communications with local counsel in FL re: withdrawal by Noonan Lance firm (.3)	Fates, Edward (Ted)	0.70	415.80	11,317.05	WO	HD	TR	_____
03/10/20	8031549	Communications with local counsel in FL and Noonan Lance firm re: request to withdraw and timing of same	Fates, Edward (Ted)	0.40	237.60	11,554.65	WO	HD	TR	_____
03/12/20	8033659	Communications with local counsel in FL (.1) revisions to consent to Noonan Lance withdrawal as co-counsel (.2) communications with Noonan Lance firm re: same (.1) discuss same with Receiver (.1)	Fates, Edward (Ted)	0.50	297.00	11,851.65	WO	HD	TR	_____

Proforma Summary

Timekeeper Number	Timekeeper	Hours	Rate	Amounts
001665	Fates, Edward (Ted)	19.80	594.00	11,761.20
002348	Williams, Rebecca	0.30	301.50	90.45
		20.10		\$11,851.65
Subtotal Fees				\$11,851.65

08/05/20 20:52:53 PROFORMA STATEMENT FOR MATTER 378827.00008 (Krista Freitag, as Receiver for ANI Deve) (SEC v. Champion-Cain - Pending Litigatio)

Proforma Summary

Timekeeper

Number	Timekeeper	Hours	Rate	Amounts
Discount				0.00
Total Fees				11,851.65
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 08/05/20

	Fiscal YTD			Calendar YTD			LTD		
	Total	Fees	Disb.	Total	Fees	Disb.	Total	Fees	Disbursements
Worked	3,106.80	3,106.80	0.00	29,014.65	29,014.65	0.00	11,851.65	11,851.65	0.00
Unbilled Adj	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00
Billed	0.00	0.00	0.00	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	44,239.50	44,167.50	72.00						
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

08/05/20 20:52:53 PROFORMA STATEMENT FOR MATTER 378827.00008 (Krista Freitag, as Receiver for ANI Deve) (SEC v. Champion-Cain - Pending Litigatio)

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

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08/05/20 20:52:54 PROFORMA STATEMENT FOR MATTER 378827.00009 (Krista Freitag, as Receiver for ANI Deve) (SEC v. Champion-Cain - Employment/Fees)

Preliminary Billing Form

Billing Atty: 001665 - Fates, Edward (Ted)

Matter #: 378827.00009

Client Name: Krista Freitag, as Receiver for ANI Deve

Date of Last Billing:

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

Proforma Number: 1048841

Client/Matter Joint Group # 378827-1

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

Trans Date	Index	Description of Service Rendered	Timekeeper	Hours	Fees	Sum	Circle	Action	
02/13/20	8004017	Revisions to Receiver 1st fee application (2.1) work on motion to file portion of AM 1st fee application under seal (1.1)	Fates, Edward (Ted)	3.20	1,900.80	1,900.80	WO	HD	TR
02/26/20	8013623	Discuss Receiver's 1st interim fee application with Receiver (.2) revisions to same (.2) meet and confer communications with SEC counsel (.2)	Fates, Edward (Ted)	0.60	356.40	2,257.20	WO	HD	TR
03/06/20	8028904	Revisions to engagement agreement for special conflict counsel, discuss same with Receiver	Fates, Edward (Ted)	0.80	475.20	2,732.40	WO	HD	TR

Proforma Summary

Timekeeper Number	Timekeeper	Hours	Rate	Amounts
001665	Fates, Edward (Ted)	4.60	594.00	2,732.40
		4.60		\$2,732.40
Subtotal Fees				\$2,732.40
Discount				0.00
Total Fees				2,732.40

08/05/20 20:52:54 PROFORMA STATEMENT FOR MATTER 378827.00009 (Krista Freitag, as Receiver for ANI Deve) (SEC v. Champion-Cain - Employment/Fees)

Proforma Summary
Timekeeper

Number	Timekeeper	Hours	Rate	Amounts
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 08/05/20

	Fiscal YTD			Calendar YTD			LTD		
	Total	Fees	Disb.	Total	Fees	Disb.	Total	Fees	Disbursements
Worked	1,591.20	1,591.20	0.00	4,442.40	4,442.40	0.00	2,732.40	2,732.40	0.00
Unbilled Adj	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00
Billed	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00
Collected	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00
AR Write Off	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00
Total	4,442.40	4,442.40	0.00						
WIP Balance									
AR Balance	0.00	0.00	0.00						
Unalloc Payment	0.00								
Client Trust 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

08/05/20 20:52:54 PROFORMA STATEMENT FOR MATTER 378827.00009 (Krista Freitag, as Receiver for ANI Deve) (SEC v. Champion-Cain - Employment/Fees)

}

08/05/20 20:52:55 PROFORMA STATEMENT FOR MATTER 378827.00010 (Krista Freitag, as Receiver for ANI Deve) (SEC v. Champion-CaiN - Bankruptcy Matter)

Preliminary Billing Form

Billing Atty: 001665 - Fates, Edward (Ted)

Matter #: 378827.00010

Client Name: Krista Freitag, as Receiver for ANI Deve

Date of Last Billing: 04/29/20

Matter Name: SEC v. Champion-CaiN - Bankruptcy Matter

Proforma Number: 1048841

Client/Matter Joint Group # 378827-1

Fees for Matter 378827.00010.(SEC v. Champion-CaiN - Bankruptcy Matter)

Trans Date	Index	Description of Service Rendered	Timekeeper	Hours	Fees	Sum	Circle	Action	
01/06/20	135862	Analyze filings related to claims against Chicago Title and motion for relief from stay in Kim Funding bankruptcy.	Fates, Edward (Ted)	0.20	118.80	118.80	WO	HD	TR
01/21/20	52427	Review filings in Kim Funding bankruptcy related relief from stay for Chicago Title and anticipated motion to dismiss bankruptcy cases.	Fates, Edward (Ted)	0.20	118.80	237.60	WO	HD	TR

Proforma Summary

Timekeeper Number	Timekeeper	Hours	Rate	Amounts
001665	Fates, Edward (Ted)	0.40	594.00	237.60
		0.40		\$237.60
Subtotal Fees				\$237.60
Discount				0.00
Total Fees				237.60
Total Disbursements				0.00

Attorney Billing Instructions

08/05/20 20:52:55 PROFORMA STATEMENT FOR MATTER 378827.00010 (Krista Freitag, as Receiver for ANI Deve) (SEC v. Champion-CaiN - Bankruptcy Matter)

()	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 08/05/20

	Fiscal YTD			Calendar YTD			LTD		
	Total	Fees	Disb.	Total	Fees	Disb.	Total	Fees	Disbursements
Worked	0.00	0.00	0.00	237.60	237.60	0.00	237.60	237.60	0.00
Unbilled Adj	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00
Billed	0.00	0.00	0.00	2,726.55	2,726.55	0.00	2,726.55	2,726.55	0.00
Collected	0.00	0.00	0.00	2,726.55	2,726.55	0.00	2,726.55	2,726.55	0.00
AR Write Off	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00
WIP	237.60	237.60	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.
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