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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

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

Date: April 13, 2020  
Time: 11:15 a.m.  
Courtroom: 14A  
Judge: Hon. Larry Alan 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 First Interim Application for Payment of Fees and Reimbursement of  
 6 Expenses (the "Application"). This Application covers the period from the  
 7 Receiver's appointment on September 3, 2019 through December 31, 2019 (the  
 8 "Application Period"), and seeks approval of \$799,308.00 in fees and \$10,409.51 in  
 9 expenses, and an order authorizing the Receiver to pay, on an interim basis, 80% of  
 10 the fees incurred (\$639,446.40) and 100% of the expenses incurred (\$10,409.51).

# 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 promptly determined that experienced and qualified counsel was  
 28 critical to the 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 immediately 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 Second Interim Report and Recommendations ("Second Report") filed on February 7, 2020 (Dkt. 241), which describes in detail the Receiver's activities during the Application Period.

This Application seeks approval of \$799,308.00 in fees for a total of 1,360.20 hours worked, and payment on an interim basis of 80% of that amount, or \$639,446.40. 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**<sup>1</sup> and is broken down into the following categories:

Category	Hours	Amount
General Receivership	79.10	\$46,722.15
Asset Investigation & Recovery	446.70	\$262,988.10
Reporting	39.90	\$24,900.30
Operations & Asset Sales	455.70	\$256,058.55
Claims & Distributions	163.10	\$107,579.25
Third Party Recoveries	150.10	\$85,189.95
Pending Litigation	20.40	\$13,143.15
Bankruptcy Matters	5.20	\$2,726.55
<b>Total Fees</b>	<b>\$1,360.20</b>	<b>\$799,308.00</b>

<sup>1</sup> 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 initial phase of a complex equity receivership always involves substantial  
2 work by the receiver and professionals to (a) identify and secure cash, real property,  
3 and other assets, (b) preserve their value, (c) investigate and pursue recovery of  
4 funds disbursed from the Receivership Entities' accounts, (d) address operational  
5 and employee issues, (e) gather and review key documents, and (f) advise the Court  
6 on the status of the Receiver's activities, among other areas of work. As this type of  
7 receivership progresses, fees and costs generally decline as operations are stabilized,  
8 assets are secured and protected, and procedures for the efficient administration of  
9 the receivership are put in place.

10 In this instance, the receivership estate includes a large number of affiliated  
11 entities that had (a) numerous different business operations (restaurants, catering,  
12 retail, hotel management, property management/vacation rental, real estate  
13 development, and co-working office rental), (b) over 350 employees, (c) significant  
14 real property and personal property assets, and (d) numerous outstanding  
15 investments/loans. Unfortunately, the business operations were losing substantial  
16 sums each month, requiring the Receiver, with assistance from Allen Matkins, to  
17 promptly take steps to reduce personnel and operating expenses, and engage Cohn  
18 Restaurant Group to provide operational guidance and assistance for the remaining  
19 restaurants.

20 Not only did the sheer number and size of the Receivership Entities'  
21 operations and assets require a substantial amount of urgent legal work, but the  
22 Receivership Entities were literally days away from running completely out of cash  
23 and the only significant source of cash (funds held by Chicago Title) was  
24 improperly withheld by Chicago Title despite the clear terms of the Appointment  
25 Order. This created an immediate and severe cash crisis that required significantly  
26 more legal work than otherwise would have been necessary. For example, instead  
27 of being able to make debt service payments to secured lenders (of which there are  
28 many), the Receiver and her counsel had to spend numerous hours discussing the

1 cash crisis with lenders, explaining the effect of the litigation stay, and convincing  
 2 them that debt service payments would be made when cash became available.  
 3 Moreover, when Chicago Title finally turned the funds over at the Court's direction,  
 4 significant additional legal work was required to negotiate terms on which the  
 5 Receiver would bring mortgages current or make payoffs at the closing of sales,  
 6 including waivers/reductions of default interest, prepayment penalties, late charges,  
 7 and attorney fees.

8 With much of the urgent work to secure assets now done, many of the  
 9 Receivership Entities' former operations now terminated, and remaining operations  
 10 now stabilized, the Receiver and Allen Matkins expect the legal fees to decline  
 11 going forward. The two largest categories of work – Asset Investigation &  
 12 Recovery and Operations & Asset Sales – represent approximately 67% of the fees  
 13 incurred during the Application Period. As discussed below, much of this work  
 14 relates to gathering critical documents through letters and subpoenas, and stabilizing  
 15 business operations, both of which are one-time, non-recurring tasks. The  
 16 downward trend in legal fees is confirmed by the following fee breakdown by  
 17 month:

18	September 3 through September 30, 2019	\$248,602.35
19	October 2019	\$195,561.00
20	November 2019	\$193,638.60
21	December 2019 <sup>2</sup>	\$161,591.85
22	January 2020 (not included in this Application)	\$189,328.50

23  
 24 Allen Matkins has worked diligently and efficiently to assist the Receiver  
 25 with legal issues facing the receivership estate through the transition from a large,  
 26 active enterprise to a Court-ordered receivership. The Firm's work has allowed the  
 27

28 <sup>2</sup> The total hours worked in December is naturally a little lower than other months  
 due to the holidays.

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

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

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

#### **1. General Receivership.**

Services in this category relate to assisting the Receiver with matters relating to the general administration of the receivership estate and the underlying litigation. Initially, Allen Matkins' work within this category focused on the review and analysis of key orders and pleadings, the evidence presented by the Commission, and case materials, as well as interaction with attorneys for the Commission, other governmental agencies, and counsel for Ms. Champion-Cain. This work was necessary to advise the Receiver on legal issues relating to the scope of the receivership, the duties and powers conferred upon her by the Court pursuant to the Appointment Order, and the effect of other key provisions of the Court's Appointment Order. In addition, as required under 28 U.S.C. § 754, Allen Matkins assisted the Receiver in promptly filing the Complaint and Appointment Order in other judicial districts wherein Receivership Assets are or may be located or implicated. The effect of these filings is to extend the Court's territorial jurisdiction to Receivership Assets and interests located within those districts.<sup>3</sup>

In addition, during the Application Period, Allen Matkins also devoted time to conferring with attorneys at the United States Attorney's Office for the Southern District of California ("AUSAs") regarding a subpoena for documents and related issues, the Receiver's investigation of the Receivership Entities, and interviews conducted by AUSAs of former ANI employees. Allen Matkins further assisted the

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<sup>3</sup> As additional assets located in other districts are identified, Allen Matkins will assist the Receiver with necessary filings under Section 754.



1 Receiver in analyzing the scope of the Receivership Entities' D&O insurance  
 2 policies and potential issues arising out of possible claims in connection therewith,  
 3 removing Ms. Champion-Cain's personal belongings located at Receivership Entity  
 4 properties and terminating her access to Receivership Entity computer systems and  
 5 ANI's office building, handling issues in connection with the termination of  
 6 employees of the Receivership Entities, and analyzing a pending Internal Revenue  
 7 Service tax audit of ANI. Allen Matkins also devoted significant time to analyzing,  
 8 and responding to, motions to intervene in the case filed by the Edelman investors,  
 9 ANICO, and Merit Financial. The reasonable and necessary fees for Allen Matkins'  
 10 work in this category total \$46,722.15.

## 11                   2.     Asset Investigation & Recovery.

12           The substantial services in this category relate generally to efforts to identify,  
 13 secure, preserve, investigate and recover Receivership Assets. As can be expected  
 14 during the early stage of a receivership involving allegations of a large-scale Ponzi  
 15 scheme, investigation-related tasks comprised the largest category of Allen Matkins'  
 16 work during the Application Period. The tasks performed include the following:

- 17           •     Developing a plan and implementing a strategy for the takeover of the  
 18 Receivership Entities including, but not limited to, the transition of  
 19 control and management of the Receivership Entities, the termination  
 20 of Receivership Entity employees, and the preservation, recovery, and  
 21 control of Receivership Assets;
- 22           •     Issuing approximately 43 subpoenas to financial institutions, lenders,  
 23 recipients of potential Receivership Assets, and others involved with or  
 24 otherwise connected to the Receivership Entities or Receivership  
 25 Assets in some manner;
- 26           •     Issuing demand and asset turnover letters to recipients believed to be in  
 27 possession of Receivership Assets in order to enable the Receiver to  
 28 recover and gain control over the Assets;

- 1 • Analyzing extensive real property holdings of the Receivership Entities  
2 in order to record the Appointment Order in appropriate jurisdictions;
- 3 • Issuing document preservation letters to recipients believed to be in  
4 possession of the Receivership Entities' books and records;
- 5 • Analyzing various life insurance policies maintained by the  
6 Receivership Entities and Ms. Champion-Cain in order to assess the  
7 potential for recoveries therefrom;
- 8 • Analyzing issues in connection with turning over frozen funds in one of  
9 Ms. Champion-Cain's personal accounts, and preparing a  
10 corresponding joint motion to request the turnover of such funds;
- 11 • Providing formal notification of the receivership to financial  
12 institutions, certain lenders, recipients of potential Receivership Assets,  
13 all known landlords of properties upon which the Receivership Entities  
14 operated and/or leased premises, and other persons and entities who  
15 sought to commence legal proceedings or otherwise institute legal  
16 process against one or more of the Receivership Entities;
- 17 • Gathering, organizing, and reviewing documents and information  
18 obtained from third parties including, but not limited to, lease  
19 agreements, loan documents, escrow agreements, and financial and  
20 accounting records;
- 21 • Analyzing investor loans and associated documentation including, but  
22 not limited to, guaranties, in order to develop a better understanding of  
23 the nature and scope of the alleged fraudulent scheme;
- 24 • Notifying certain landlords of the Receiver's decision to terminate  
25 certain Receivership Entity leases and close operations thereon, and  
26 handling issues in connection therewith including, but not limited to,  
27 the disposition of furniture, fixtures, and equipment;
- 28

- 1 • Handling issues in connection with the Chicago Title Company's
- 2 ("CTC") failure to turn over funds held in a Receivership Entity
- 3 account (described in further detail below);
- 4 • Addressing discovery disputes in connection with third-party
- 5 subpoenas; and
- 6 • Remaining in contact with ANI's in-house and outside counsel
- 7 regarding a variety of matters including, but not limited to, document
- 8 preservation, insurance claims, Receivership Entity trademarks,
- 9 pending claims by former Receivership Entity employees, and attorney-
- 10 client privilege issues.

11 As briefly addressed above, Allen Matkins devoted considerable time to  
 12 issues in connection with CTC's failure to turnover funds held in a Receivership  
 13 Entity account maintained at CTC. Specifically, the Receiver, with the assistance of  
 14 Allen Matkins, sought the immediate turnover of approximately \$11.3 million in  
 15 funds held in the applicable account, which the Receiver confirmed, after reviewing  
 16 ANI's books and records, were subject to the terms of the Appointment Order. The  
 17 continued failure of Chicago Title to immediately turn over the funds directly  
 18 impaired the Receiver's ability to adequately evaluate and assess the business  
 19 operations of the Receivership entities and, in turn, preserve and maximize the value  
 20 of Receivership Assets.

21 Accordingly, given the amount of money at stake and cash crisis facing the  
 22 receivership estate, Allen Matkins prepared the *Ex Parte* Application of Receiver for  
 23 Order to Show Cause Why Chicago Title Company Should Not be Held in Civil  
 24 Contempt (ECF No. 119), the reply in support thereof, and all other necessary and  
 25 appropriate pleadings in connection with turnover of the subject funds, and attended  
 26 the hearing held by Magistrate Judge Goddard on September 25, 2019. Allen  
 27 Matkins also issued two subpoenas to CTC demanding documents, the latter of  
 28 which CTC has only produced limited documents to date. Allen Matkins has

1 engaged in good-faith meet and confer efforts with counsel for Chicago Title  
2 regarding the scope of the subpoena and requested documents. Allen Matkins also  
3 assisted the Receiver early in the receivership in addressing issues relating to a  
4 potential conflict of interest involving ANI and CTC's counsel.

5 Allen Matkins also assisted the Receiver in identifying necessary and  
6 appropriate subpoena targets, preparing subpoenas, and conferring with recipients  
7 regarding any production objections and/or issues including, but not limited to, the  
8 allocation of costs associated with preparing a response and producing responsive  
9 materials. Allen Matkins also prepared numerous letters to third parties, including:

- 10 • Cease-and-desist letters addressed to those who threatened legal action  
11 or otherwise commenced legal process against any of the Receivership  
12 Entities, which notified the recipients of the Appointment Order and  
13 litigation stay contained therein. Recipients included mechanics' lien  
14 filers, particularly in connection with the 301 D Street apartments, in  
15 West Sacramento, CA, and landlords notifying the Receivership  
16 Entities of potential eviction proceedings;
- 17 • Demand/turnover letters requesting the recipient to turnover  
18 Receivership Entity books and records;
- 19 • Document preservation letters to third parties believed to be in  
20 possession of Receivership Assets in the form of books and records;
- 21 • Termination letters, which notified recipients that a particular contract  
22 or lease was being terminated; and
- 23 • Investment letters, which were transmitted to recipients purportedly in  
24 possession of Receivership Assets, requesting either prompt payment in  
25 connection with Receivership Entity investments, or information  
26 regarding the nature and scope of the particular investment.

27 Most of these letters required additional follow up and attorney time to ensure  
28 the recipients' compliance and/or understanding of the terms, as applicable.

1 Finally, Allen Matkins assisted the Receiver in dealing with two residential  
 2 leases by and between a Receivership Entity, on the one hand, and a former ANI  
 3 employee on the other hand. The terms of both leases were inconsistent with the  
 4 surrounding market for residential rental properties. Accordingly, Allen Matkins is  
 5 assisting the Receiver with regaining possession of those premises so they can be  
 6 secured. The reasonable and necessary fees for Allen Matkins' work in this  
 7 category total \$262,988.10.

### 8 3. Reporting.

9 Allen Matkins' services in this category were focused primarily on preparing  
 10 and filing the Receiver's Motion for Order in Aid and the Receiver's Verified Initial  
 11 Report, Recommendations, and Petition for Further Instructions (the "Verified  
 12 Initial Report"). The Verified Initial Report describes the Receiver's efforts early in  
 13 the case to implement the Appointment Order, including securing and protecting  
 14 cash in accounts, documents, and electronic data. The report also provides  
 15 substantial preliminary information on the real estate assets, liquor licenses, and  
 16 investments/loans included in the receivership estate. Finally, the report includes  
 17 the Receiver's initial recommendations for the continued administration of the  
 18 receivership.

19 The Motion for Order in Aid of Receivership addressed, among other things,  
 20 the following:

- 21 • Employing Allen Matkins as legal counsel;
- 22 • Engaging licensed brokers to list real properties;
- 23 • Notice to all interested parties of certain petitions, reports, and  
 24 applications via the receivership website, anireceivership.com, and  
 25 email rather than by U.S. mail; and
- 26 • Filing of interim reports and interim fee applications on a quarterly  
 27 basis.

28

Allen Matkins also assisted in preparing a reply to the oppositions filed by lender ANICO and two investor groups, and attended the hearing held on November 18, 2019. The Court granted the Motion for Order in Aid, in part, on November 22, 2019 (Dkt. 126), which has promoted the efficient administration of the receivership. The reasonable and necessary fees for Allen Matkins' work in this category total \$24,900.30.

#### 4. Operations & Asset Sales.

Allen Matkins' significant work in this category reflects the volume and complexity of issues that arose during the Application Period in connection with the maintenance and operation of the various businesses owned and operated by the Receivership Entities, real properties, leased properties, and other receivership assets. Indeed, this was the second largest category of Allen Matkins' work during the Application Period. In summary, work within this category included the following:

- Drafting, negotiating, and revising confidentiality agreements, purchase and sale agreements, amendments to pre-receivership purchase and sale agreements, commercial and residential leases and lease amendments, vacation rental agreements, restaurant operating agreements, and restaurant management agreements, where necessary and appropriate, for various receivership businesses and properties, as well as handling related title, loan, and contract issues;
- Analyzing and assisting with restaurant closures, terminations of leases for retail and restaurant spaces, surrender of possession, liquor license issues, UCC lien issues, and removal of personal property and other fixtures upon the termination of such leases;
- Attending to issues in connection with the maintenance of existing trademarks, and abandonment of certain other unused trademarks, relating to the Receivership Entities' various businesses;

- 1 • Addressing issues of employment law for the Receivership Entities,  
2 including employee terminations, unpaid PTO, WARN Act issues,  
3 health insurance and COBRA issues, and independent contractor  
4 agreements in connection with businesses operations and the wind  
5 down thereof (indeed, at the time of the Receiver's appointment, bi-  
6 weekly payroll was approximately \$550,000 (not including benefits)  
7 with approximately 350 employees total and 70 corporate-level  
8 employees. Bi-weekly payroll is now under \$150,000);
- 9 • Assessing security concerns at the ANI main office and engaging a  
10 security guard to partly assuage those concerns;
- 11 • Analyzing insurance coverage issues and policy renewals including, but  
12 not limited to, EPLI and D&O coverage issues, insurance for  
13 receivership properties, and life insurance policies on employees;
- 14 • Handling communications with counsel for various landlords  
15 concerning leased restaurant spaces, rent obligations, personal property  
16 assets, and liquor licenses;
- 17 • Advising and assisting with responses to numerous media inquiries  
18 regarding the receivership, restaurant operations, restaurant closures,  
19 and related matters;
- 20 • Advising on termination of the hotel management contract for Casa del  
21 Zorro, as well as termination of various vendor and service contracts;
- 22 • Gathering information and analyzing issues regarding sales of real  
23 property pending in escrow at the time of the Receiver's appointment  
24 (4205 Lamont Street #12, 1617 Thomas Avenue, and 132 Keller  
25 Street);
- 26 • Preparing and revising a purchase and sale agreement for the ANI  
27 membership interest in the Pullman Lofts, communicating with counsel  
28



1 for the proposed buyer, advising on issues related to payments made by  
 2 ANI to JB Resources, and attending to related issues;

- 3 • Assisting with issues in connection with the termination of certain  
 4 service contracts associated with Receivership Entity operations;
- 5 • Advising and assisting with auction/sale procedures for personal  
 6 property assets and liquor licenses, including the engagement of a  
 7 licensed auctioneer and liquor license broker;
- 8 • Preparing motions, declarations, proposed orders, reply briefs (as  
 9 applicable) and notices regarding non-receipt of overbids (as  
 10 applicable) for Court approval of sales of the following: 4205 Lamont  
 11 Street #12; 132 Keller Street; 1617 Thomas Avenue; 804 Brighton  
 12 Court; the Rancho Mirage Property; as well as two Joint Motions to  
 13 approve sales of personal property and liquor licenses associated with  
 14 the Patio on 101 and Patio on Goldfinch restaurants;
- 15 • Discussing with the parties and preparing the Joint Motion to Approve  
 16 Limited Consent to Magistrate Judge for Motions to Approve Sales of  
 17 Receivership Assets;
- 18 • Attending the December 5, 2019 hearing on the 4205 Lamont Street  
 19 #12; 132 Keller Street; and 1617 Thomas Avenue sale motions; and
- 20 • Per the Court's direction, preparing the Receiver's Proposed Property  
 21 Sale Procedures.

22 The reasonable and necessary fees for Allen Matkins' work in this category  
 23 total \$256,058.55.

#### 24 5. Claims & Distributions.

25 Services rendered in this category generally relate to the claims and interests  
 26 of investors and creditors of the Receivership Entities. Allen Matkins assisted with  
 27 issues related to disseminating information about the receivership to investor and  
 28 creditors, including notification letters, and information provided on the receivership



1 website ([www.anireceivership.com](http://www.anireceivership.com)). The firm also assisted in responding to  
2 numerous direct inquiries from investors and creditors and in preparing monthly  
3 case updates that are emailed to those who have subscribed to receive them through  
4 the receivership website.

5 In this case, there are many investors and investor groups who have engaged  
6 counsel, contacted the Receiver, through Allen Matkins, and filed various motions,  
7 oppositions, and other pleadings with the Court. Allen Matkins has handled  
8 communications with counsel for these investors and investor groups on behalf of  
9 the Receiver and has prepared responses, as appropriate, to their correspondence,  
10 informal requests, and Court filings.

11 In addition, as noted above, Chicago Title's violation of the Court's  
12 Appointment Order and refusal to turnover \$11.3 million for the first 75 days of the  
13 case caused a cash crisis that exponentially increased the work required by the  
14 Receiver and Allen Matkins to address the claims of lenders, landlords and other  
15 creditors. This work included communicating with numerous lenders and landlords,  
16 through their counsel, about the Receiver's inability to make debt service and rent  
17 payments, the cash crisis, the Receiver's *Ex Parte* Application for an Order to Show  
18 Cause why Chicago Title should not be held in contempt for its violation of the  
19 Appointment Order, and related issues. Then, once the funds were finally turned  
20 over by Chicago Title, Allen Matkins assisted the Receiver in trying to resolve  
21 creditor claims, including those of default interest, late charges, attorney fees and  
22 other charges arising from the delay in payments. Although certain properties have  
23 since been sold, the Receivership Entities held 33 real properties at the time of the  
24 Receiver's appointment, all but one of which was encumbered with a mortgage, and  
25 some of which were encumbered by two mortgages. The Receivership Entities also  
26 leased 15 commercial properties. Accordingly, the work involved in addressing and  
27 trying to resolve lender and landlord claims was substantial.

28

1 The objections filed by certain investor groups included arguing that the  
2 \$11.3 million withheld by Chicago Title belonged to the investors and should not be  
3 turned over to the Receiver or used by the Receiver. This issue was discussed at the  
4 hearing held on November 18, 2019, but was not resolved. Thereafter, in an effort  
5 to avoid further costly motion practice, the Receiver, through Allen Matkins, met  
6 and conferred with counsel representing certain investor groups regarding a Joint  
7 Motion Regarding Use of Funds Turned Over by Chicago Title, which was filed on  
8 December 10, 2019. The firm then assisted the Receiver in preparing a reply to the  
9 opposition filed by the Edelman Investors.

10 In addition, in response to requests made by multiple investor groups, the  
11 Receiver agreed to work with the investor groups on a limited, voluntary, informal  
12 sharing of ANI-related documents, along with a protective order covering such  
13 documents. The Receiver, through Allen Matkins, spent significant time meeting  
14 and conferring with counsel representing certain investor groups on the subject of  
15 informally sharing ANI-related documents and preparing a Joint Motion for  
16 approval of a proposed protective order. The Joint Motion was filed on  
17 December 18, 2019. Counsel for Chicago Title then objected to the proposed  
18 sharing of ANI-related documents without it also having access to the same  
19 documents. This resulted in further meet and confer discussions and preparation of  
20 a Supplemental Joint Motion.

21 Allen Matkins assisted the Receiver in gathering information and analyzing  
22 claims asserted by attorney James Lance, through his entity Con & Coop Beach  
23 Rentals, relating to the vacation rental properties located at 809 and 812 San Rafael  
24 in Mission Beach, including handling communications with Mr. Lance and his  
25 counsel. The firm also assisted in analyzing the loan documents and secured claims  
26 of Bank Direct, which claims relate to a life insurance policy on Defendant Gina  
27 Champion-Cain. Finally, Allen Matkins assisted the Receiver in addressing the  
28 claims and mechanic's liens asserted by various contractors associated with the

1 301 D Street project in West Sacramento as well as the contractor for 132 Keller  
 2 Street in Petaluma, including analyzing the validity of such liens recorded after  
 3 entry of the Court's Appointment Order and the litigation stay. The reasonable and  
 4 necessary fees for Allen Matkins' work in this category total \$107,579.25.

5           6.     Third Party Recoveries.

6           This portion of the Application pertains to work on potential claims against  
 7 third parties to recover amounts for the benefit of the receivership estate. Due to the  
 8 confidential nature of the legal work on these matters and the Receiver's litigation  
 9 strategy vis-à-vis third parties, the Receiver has filed a motion concurrently herewith  
 10 to file this portion of the Application under seal. The reasonable and necessary fees  
 11 for Allen Matkins' work in this category total \$85,189.95.

12           7.     Pending Litigation.

13           Services performed in this category include the detailed analysis and  
 14 management of pending pre-receivership actions in which one or more of the  
 15 Receivership Entities are parties. Specifically, work within this category was  
 16 largely devoted to two pending actions: (1) *Luu v. The Patio Restaurant*  
 17 *Grp., LLC, et al.*, San Diego Super. Ct. Case No. 37-2019-00015451-CU-OE-CTL,  
 18 which is a putative class action filed by a former employee (which action is now  
 19 stayed pursuant to the litigation stay in the Appointment Order); and (2) *Westlink*  
 20 *Dev. Co., LLC v. SunTrust Bank*, Pensacola, FL Cir. Ct. Case No. 13-008139-CI, in  
 21 which Westlink Development, LLC (a Receivership Entity) and other co-plaintiffs  
 22 have asserted claims against SunTrust Bank for aiding and abetting a multi-million  
 23 dollar Ponzi scheme allegedly orchestrated by John Condo (separate from the  
 24 alleged Ponzi scheme in this action).

25           Allen Matkins analyzed the claims involved in the SunTrust case,  
 26 communicated with Westlink's counsel located in San Diego and Florida, and  
 27 advised the Receiver on an approach to the case that would maximize the potential  
 28 recovery and minimize the costs/risks for the receivership estate. The Receiver is

1 currently negotiating a proposed contingent fee engagement with the law firm in  
 2 Florida and hopes to present the engagement to the Court for approval shortly. The  
 3 reasonable and necessary fees for Allen Matkins' work in this category total  
 4 \$13,143.15.

5 8. Bankruptcy Matters.

6 Allen Matkins' time in this category pertains to the involuntary bankruptcy  
 7 cases filed by certain investors against Kim Peterson and Kim Funding, LLC. Kim  
 8 Funding, an entity formed by Kim Peterson to facilitate investments in the ANI  
 9 liquor license loan scheme, is alleged to have raised large sums from financial  
 10 institutions, including CalPrivate Bank, Bank of California, and Ovation Finance  
 11 (among other investors), and is believed to be the largest investor in the ANI  
 12 scheme. Allen Matkins monitored the activity in the bankruptcy cases, including  
 13 emergency motions and related papers. The firm responded to inquiries from  
 14 counsel for the U.S. Trustee about the bankruptcy cases, and attending a bankruptcy  
 15 hearing in the Kim Funding, LLC bankruptcy and advised the Receiver on the  
 16 status. The reasonable and necessary fees for Allen Matkins' work in this category  
 17 total \$2,726.55.

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

19 Allen Matkins requests that the Court approve reimbursement of \$10,409.51  
 20 in out-of-pocket costs. The itemization of such expenses is summarized below by  
 21 billing category. The majority of the expenses incurred relate to the issuance and  
 22 service of subpoenas. As explained above, Allen Matkins issued approximately 43  
 23 subpoenas and gathered documents from many third parties and financial  
 24 institutions. Each of these subpoenas required proper service. At least with respect  
 25 to one particular subpoena, service had to be attempted on multiple occasions  
 26 because the recipient was attempting to evade service.

27 The total for costs incurred by Allen Matkins during the Application Period is  
 28 \$10,409.51 and is broken down by category as follows:

Category	Total
Messenger/FedEx Fees	\$1,105.49
Service of Process	\$7,196.49
Duplication	\$418.30
Filing Fees	\$751.63
Document Research	\$138.00
E-Discovery	\$505.20
Document Production	\$106.40
Telephonic Court Appearance	\$188.00
<b>Total Fees</b>	<b>\$10,409.51</b>

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

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

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

1 amount of time required, although not necessarily expended, and the overall value of  
 2 the services to the estate." *In re Imperial 400 Nat'l, Inc.*, 432 F.2d 232, 237 (3d Cir.  
 3 1970). Regardless of how this balancing test is formulated, no single factor is  
 4 determinative and "a reasonable fee is based [upon] all circumstances surrounding  
 5 the receivership." *SEC v. W.L. Moody & Co., Bankers (Unincorporated)*, 374 F.  
 6 Supp. 465, 480 (S.D. Tex. 1974).

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

14 The Receiver promptly determined that experienced, qualified counsel was  
 15 necessary due to the size and complexity of the receivership estate and the Court  
 16 agreed, approving Allen Matkins' employment on an interim basis. ECF No. 126.  
 17 The Court authorized the Receiver to petition the Court to approve the non-  
 18 provisional appointment of Allen Matkins following the Court's resolution of the  
 19 dispute over the use of recovered funds. *Id.* The dispute over the use of the funds  
 20 turned over by Chicago Title was then resolved, as reflected in the Joint Motion  
 21 filed on December 10, 2019. Dkt. 158. Accordingly, the Receiver has sought  
 22 approval of her non-provisional engagement of Allen Matkins as part of her  
 23 concurrently filed fee application. The Court also previously approved the  
 24 Receiver's proposal to file interim reports and fee applications on a quarterly basis.  
 25 Dkt. 126.

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

1 of issues presented. As noted above, the request for fees is based on Allen Matkins'  
 2 customary billing rates charged for comparable services provided in other matters,  
 3 less a 10% discount.

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

### 14 **III. CONCLUSION.**

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

- 16 1. Approving Allen Matkins' fees of \$799,308.00;
- 17 2. Authorizing and directing the Receiver to pay 80% of approved fees, or  
 18 \$639,446.40, from the assets of the Receivership Entities;
- 19 3. Approving Allen Matkins' costs in the amount of \$10,409.51, and  
 20 authorizing and directing the Receiver to reimburse such costs in full; and
- 21 4. For such other and further relief as the Court deems appropriate.

22  
 23 Dated: March 2, 2020

ALLEN MATKINS LECK GAMBLE  
 MALLORY & NATSIS LLP

24  
 25 By: s/Edward G. Fates

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

**EXHIBIT INDEX**

<b>EXHIBIT NO.</b>	<b>DESCRIPTION</b>	<b>PAGE NO.</b>
Exhibit A	Detailed Descriptions of Services Rendered	25



# EXHIBIT A

# EXHIBIT A

02/14/20 10:00:51 PROFORMA STATEMENT FOR MATTER 378827-00002 (Krista Freitag, as Receiver for ANI Development, LLC, et al.) (SEC v. Champion-Cain - General Receivership)

### ***Preliminary Billing Form***

Billing Atty: 001665 - Edward Fates

Matter #: 378827-00002

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

Date of Last Billing:

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

Proforma Number 1456085

Client/Matter Joint Group # 378827-1

#### **Fees for Matter 378827-00002 (SEC v. Champion-Cain - General Receivership)**

Trans Date	Index	Description of Service Rendered	Timekeeper	Hours	Fees	Sum	Circle Action
09/03/19	7946913	Analyze SEC complaint and joint motion for Preliminary Injunction (1.1); calls/emails with Receiver regarding same (.6).	Fates, Edward (Ted)	1.7	1,009.80	1,009.80	WO HD TR_____
09/04/19	7949333	Prepare notices of complaint and receivership order pursuant to 28 USC § 754.	Kaup, John	0.5	146.25	1,156.05	WO HD TR_____
09/04/19	7948511	Address inquiry from AUSA and advise Receiver regarding response to same.	Fates, Edward (Ted)	0.2	118.80	1,274.85	WO HD TR_____
09/05/19	7948515	Communications with counsel for Champion-Cain re: proposed amendment to PI Order (.4); call with SEC counsel re: same (.2); call with AUSA re: subpoena for documents and related issues (.3).	Fates, Edward (Ted)	0.9	534.60	1,809.45	WO HD TR_____
09/06/19	7949472	Work on District Court filings regarding jurisdiction over assets in other districts pursuant to 28 USC 754 (.6); calls with Receiver, SEC counsel and AUSA regarding facts learned through Receiver investigation (1.4); work on access	Fates, Edward (Ted)	2.4	1,425.60	3,235.05	WO HD TR_____

Trans Date	Index	Description of Service Rendered	Timekeeper	Hours	Fees	Sum	Circle Action
		letter to SEC counsel (.4).					
09/08/19	7950490	Discuss issues with AUSA interviews with ANI employees with Receiver.	Fates, Edward (Ted)	0.2	118.80	3,353.85	WO HD TR_____
09/09/19	7953815	Review and analysis of real property holdings for recordings of receivership orders.	Kaup, John	0.4	117.00	3,470.85	WO HD TR_____
09/09/19	7952100	Meetings/communications with criminal authorities and Receiver relating to interviews of various ANI employees (.8); communications with counsel for Champion-Cain regarding termination of access to computer system and office building (.4).	Fates, Edward (Ted)	1.2	712.80	4,183.65	WO HD TR_____
09/11/19	7974214	Conference and analysis re: receivership issues and tasks (.4); initial review and analysis of complaint, appointment order and supporting documents, escrow agreement, and sample loan documents (1.6); review and analysis of various materials re: D&O insurance issues and claims (1.3); review, analysis and exchange of e-mails re: scope of policies and potential issues re: claims (.4); various conferences, analysis and review of correspondence re: recovery of funds held by Chicago Title (.6); preparation for and participation in conference call with S. Strauss re: turnover (.5); review, analysis and exchange of e-mails with counsel re: same (.3); conferences, analysis, review of authority and exchange of e-mails re: potential ex	Farrell, Michael	6.1	4,364.55	8,548.20	WO HD TR_____

Trans Date	Index	Description of Service Rendered	Timekeeper	Hours	Fees	Sum	Circle Action
		parte application (1.4).					
09/11/19	7954055	Call/emails with AUSA regarding subpoena to be issued to Receiver and document requests (.6); communications with Receiver and SEC counsel re: cashier's checks from Chase for Champion-Cain frozen accounts (.5); .	Fates, Edward (Ted)	1.1	653.40	9,201.60	WO HD TR_____
09/12/19	7955249	Address issues with Chase as to Champion-Cain personal accounts, advise Receiver regarding same (.2); call with Receiver, SEC counsel and Chase regarding same (.2); prepare notice of appearance as counsel for receiver (.1); review subpoena issued by AUSA and discuss requests for documents with Receiver (.4); advise Receiver regarding request by Champion-Cain to retrieve personal items from ANI office (.1).	Fates, Edward (Ted)	1.0	594.00	9,795.60	WO HD TR_____
09/12/19	7957443	Draft and transmit 754 filing letter to the N.D. of Ill. (.3); draft ex parte application to turn over funds to the Receiver and confer with counsel regarding the same (5.1).	Aspis, Norman	5.4	2,187.00	11,982.60	WO HD TR_____
09/13/19	7956980	Call/emails with counsel for Champion-Cain regarding schedule of personal assets and information for same, discuss same with Receiver.	Fates, Edward (Ted)	0.4	237.60	12,220.20	WO HD TR_____
09/14/19	7957472	Communications with Receiver re issues with Champion-Cain personal property located at receivership properties(.3) communications with counsel for Champion-Cain re: same	Fates, Edward (Ted)	0.6	356.40	12,576.60	WO HD TR_____

Trans Date	Index	Description of Service Rendered	Timekeeper	Hours	Fees	Sum	Circle Action
		and related issues (.3)					
09/16/19	7958020	Communications with Receiver and ANI outside counsel regarding Champion-Cain employment termination issues (.4); communications with counsel for Champion-Cain regarding same (.3); communications with counsel for Champion-Cain regarding termination of legal services to ANI and concerns with Champion-Cain removal of personal property from ANI property (.5); advise Receiver regarding same (.1).	Fates, Edward (Ted)	1.3	772.20	13,348.80	WO HD TR_____
09/16/19	7959022	Prepare notice of appearance for counsel and transmit for filing (.2).	Aspis, Norman	0.2	81.00	13,429.80	WO HD TR_____
09/17/19	7974864	Various conferences, analysis and exchange of e-mails re: ex parte issues and strategy (.7); reviewed minute order re: transfer to magistrate and analysis re: effect of same (.2); telephone conference with court clerk and exchanged e-mails re: same (.4); review and analysis of scheduling order and analysis re: effect of delays on receiver's position (.3); outlined potential courses of action (.3).	Farrell, Michael	1.9	1,359.45	14,789.25	WO HD TR_____
09/17/19	7959186	Advise Receiver on conflict waiver issue with counsel for CalPrivate Bank (.2); communications with counsel for CalPrivate Bank regarding same (.1); analyze response from carrier as to ANI employee D&O claims (.2).	Fates, Edward (Ted)	0.5	297.00	15,086.25	WO HD TR_____

Trans Date	Index	Description of Service Rendered	Timekeeper	Hours	Fees	Sum	Circle Action
09/18/19	7961071	Discuss communication from Champion-Cain and response to same with Receiver (.2); communications with counsel for Champion-Cain (.2); meet and confer with SEC counsel and Champion-Cain counsel regarding stipulation to extend Champion-Cain deadline to respond to SEC Complaint (.3).	Fates, Edward (Ted)	0.7	415.80	15,502.05	WO HD TR_____
09/19/19	7962483	Communications with ANI personnel and counsel for Champion-Cain regarding letter and packet regarding termination of employment (.2); call/emails with counsel for Champion-Cain regarding funding for attorney fees and items removed from Rancho Mirage property (.7).	Fates, Edward (Ted)	0.9	534.60	16,036.65	WO HD TR_____
09/21/19	7964578	Analyze and advise Receiver on QSF tax issues and treatment.	Fates, Edward (Ted)	0.4	237.60	16,274.25	WO HD TR_____
09/26/19	7970601	Review information regarding newly discovered interest in Arizona; prepare filing of complaint and order in District of Arizona.	Kaup, John	0.3	87.75	16,362.00	WO HD TR_____
09/26/19	7969666	Work on additional filing under 28 USC 754.	Fates, Edward (Ted)	0.2	118.80	16,480.80	WO HD TR_____
09/27/19	7971123	Review and analysis of motion to intervene and exchanged various e-mails re: same (.7); analysis re: timing of objection and compliance with statutory periods (.3).	Farrell, Michael	1.0	715.50	17,196.30	WO HD TR_____
09/27/19	7972099	Review status of filings of receivership orders.	Kaup, John	0.1	29.25	17,225.55	WO HD TR_____

Trans Date	Index	Description of Service Rendered	Timekeeper	Hours	Fees	Sum	Circle Action
09/27/19	7970856	Analyze motion to intervene and for relief regarding local rules filed by Edelman investors (.4); advise Receiver regarding same (.3); communications with AUSA regarding document production pursuant to subpoena, discuss same with Receiver (.4).	Fates, Edward (Ted)	1.1	653.40	17,878.95	WO HD TR_____
09/28/19	8012170	Email related to production to FBI (.2). Review intervention motion, email/advice to counsel as to intervention motion (.4).	Zaro, David	0.6	472.50	18,351.45	WO HD TR_____
09/28/19	7971147	Communications with Receiver and counsel for Champion-Cain (.1); communications with AUSA regarding document production per subpoena (.2).	Fates, Edward (Ted)	0.3	178.20	18,529.65	WO HD TR_____
09/30/19	7972122	Call with SEC counsel regarding Aguirre ex parte motion to advance hearing on motion to intervene (.2); prepare initial response to same (.3); discuss same and response from Aguirre with Receiver (.2); communications with SEC counsel regarding access letter and investor contact information (.4); review same and discuss with Receiver (.3); analyze chamber rules regarding responses to ex parte applications (.2); analyze Aguirre ex parte motion and supporting declaration (.4).	Fates, Edward (Ted)	2.0	1,188.00	19,717.65	WO HD TR_____
10/01/19	7978383	Analysis of the Edelman's intervention/ex parte application, work on draft of Receiver's response (.5). Call with Receiver counsel related to	Zaro, David	0.8	630.00	20,347.65	WO HD TR_____

Trans Date	Index	Description of Service Rendered	Timekeeper	Hours	Fees	Sum	Circle Action
		the draft opposition to ex parte application and issues re underlying Edelman motion (.3).					
10/01/19	7976768	Work on opposition to Aguirre/Edelman ex parte application (1.4); address issues with unemployment claim filed with EDD by Champion-Cain (.2); communications with counsel for Champion-Cain regarding same (.2); call/emails with Receiver, Champion-Cain and counsel for Champion-Cain regarding tax issues, company assets, potential asset sales, collection of personal items, and related issues (1.1).	Fates, Edward (Ted)	2.9	1,722.60	22,070.25	WO HD TR_____
10/02/19	7981212	Review SEC opposition to intervention motion, related ex parte application, follow-up on Receiver opposition (.4). Call with counsel as to intervention (.2).	Zaro, David	0.6	472.50	22,542.75	WO HD TR_____
10/02/19	7980276	Update list of receivership entities and forward; review and respond to emails; review and forward message from person interested in receivership properties.	Kaup, John	0.4	117.00	22,659.75	WO HD TR_____
10/02/19	7978144	Communications with Receiver and AUSA regarding document production pursuant to subpoena (.2); communications with Champion-Cain regarding issues related to tax returns (.1).	Fates, Edward (Ted)	0.3	178.20	22,837.95	WO HD TR_____
10/03/19	7979162	Analyze issues raised in Aguirre/Edelman reply regarding ex	Fates, Edward (Ted)	0.2	118.80	22,956.75	WO HD TR_____



Trans Date	Index	Description of Service Rendered	Timekeeper	Hours	Fees	Sum	Circle	Action
		parte motion to advance hearing on motion to intervene.						
10/04/19	7979982	Communications with ANI outside counsel and Receiver regarding pending IRS tax audit.	Fates, Edward (Ted)	0.3	178.20	23,134.95	WO	HD TR_____
10/06/19	7980473	Communications with ANI outside tax counsel	Fates, Edward (Ted)	0.2	118.80	23,253.75	WO	HD TR_____
10/07/19	7981502	Call with ANI outside counsel regarding issues relating to pending IRS tax audit of ANI (.5); gather additional information regarding same from Receiver and ANI staff (.4); respond to inquiry from counsel for Champion-Cain regarding potential stipulation to unfreeze retirement account (.2); communications with AUSA (.1).	Fates, Edward (Ted)	1.2	712.80	23,966.55	WO	HD TR_____
10/07/19	7981193	TC with Higgs Fletcher re. IRS audit and tax issues.	Kraus, Katherine	0.6	391.50	24,358.05	WO	HD TR_____
10/08/19	7982296	Initial analysis of ANI files relating to IRS audit (.4); call with AUSA regarding Receiver accounting and investor loss information (.3); call with counsel for Champion-Cain regarding potential unfreezing of personal funds, insurance issues, tax returns, trust documents, and related issues (.4).	Fates, Edward (Ted)	1.1	653.40	25,011.45	WO	HD TR_____
10/09/19	7984238	Respond to inquiries from counsel for Champion-Cain regarding insurance policies and tax returns.	Fates, Edward (Ted)	0.4	237.60	25,249.05	WO	HD TR_____
10/10/19	7986173	Review and respond to Aguirre/Edelman request to meet and	Fates, Edward (Ted)	0.2	118.80	25,367.85	WO	HD TR_____

Trans Date	Index	Description of Service Rendered	Timekeeper	Hours	Fees	Sum	Circle Action
		confer regarding ex parte application.					
10/10/19	8009701	Analyze case law regarding duties of receiver for portion of brief and draft portion of brief (.6).	Aspis, Norman	0.6	243.00	25,610.85	WO HD TR_____
10/11/19	7989071	Review of information regarding property in Ann Arbor and prepare filing of complaint and receivership order pursuant to 28 USC § 754.	Kaup, John	0.2	58.50	25,669.35	WO HD TR_____
10/11/19	7987482	Work on 28 USC 754 filing for E.D. Mich. for ANI mortgage on residential property.	Fates, Edward (Ted)	0.2	118.80	25,788.15	WO HD TR_____
10/14/19	7989204	Conference call with counsel for Edelman Investors and counsel for SEC regarding potential further ex parte application to intervene and related issues (.6); update Receiver regarding same (.1).	Fates, Edward (Ted)	0.7	415.80	26,203.95	WO HD TR_____
10/15/19	7990175	Meet and confer with SEC counsel regarding further correspondence from counsel for Edelman investors and issues related to non-ANI gmail account (.2); initial review of documents produced by ANI outside tax counsel regarding IRS audit (.3).	Fates, Edward (Ted)	0.5	297.00	26,500.95	WO HD TR_____
10/16/19	7990830	Review proposed stipulation regarding Casa del Zorro and discuss same with Receiver (.2); communications with SEC counsel regarding same and concerns with Schwab account (.2).	Fates, Edward (Ted)	0.4	237.60	26,738.55	WO HD TR_____
10/17/19	7992359	Communications with SEC counsel and Receiver regarding document production request and response to	Fates, Edward (Ted)	1.2	712.80	27,451.35	WO HD TR_____

Trans Date	Index	Description of Service Rendered	Timekeeper	Hours	Fees	Sum	Circle Action
		same (.6); discuss issues relating to IRS Form 56 filings with L. Ryan (.2); discuss joint motion regarding Casa del Zorro with Receiver, revisions to same (.3); communications with SEC counsel regarding same (.1).					
10/18/19	7998077	Telephone conference regarding hearing notice.	Kaup, John	0.1	29.25	27,480.60	WO HD TR_____
10/18/19	7993207	Review clawback letter in connection with document production to SEC counsel (.2); communications with SEC counsel regarding same (.3); discuss correspondence from counsel for Edelman investors and responses to same with Receiver (.8).	Fates, Edward (Ted)	1.3	772.20	28,252.80	WO HD TR_____
10/21/19	7994784	Work on privilege clawback letter to SEC counsel, discuss same with Receiver (.4); analyze further correspondence from G. Aguirre and prepare initial response to same (.4); work on opposition to Edelman Investors' motion to intervene (1.7).	Fates, Edward (Ted)	2.5	1,485.00	29,737.80	WO HD TR_____
10/22/19	7996458	Call/emails with Champion-Cain and counsel regarding property insurance notice and inquiry regarding Carmel property (.6); finalize clawback letter agreement and discuss execution of same with Receiver (.5); analyze motion to intervene filed by Merit Financial, advise Receiver regarding same (.7).	Fates, Edward (Ted)	1.8	1,069.20	30,807.00	WO HD TR_____
10/23/19	7997962	Discuss status and timing of collection/preservation of ANI electronic data and production of	Fates, Edward (Ted)	0.4	237.60	31,044.60	WO HD TR_____

Trans Date	Index	Description of Service Rendered	Timekeeper	Hours	Fees	Sum	Circle Action
		same with G. Rodriguez.					
10/24/19	8002615	Review and analysis of life insurance documents; conference with Attorney Fates.	Kaup, John	0.4	117.00	31,161.60	WO HD TR_____
10/24/19	7999169	Discuss next steps for analyzing and addressing pending IRS audit with Receiver (.4); work on opposition to Edelman Investors' motion to intervene (2.7).	Fates, Edward (Ted)	3.1	1,841.40	33,003.00	WO HD TR_____
10/25/19	7999737	Review letters from IRS regarding Affordable Care Act taxes due from ANI entities and advise Receiver regarding same.	Fates, Edward (Ted)	0.4	237.60	33,240.60	WO HD TR_____
10/25/19	8000688	Review status of IRS audit of ANI.	Kraus, Katherine	1.2	783.00	34,023.60	WO HD TR_____
10/28/19	8001157	Analyze and advise Receiver on analysis of IRS audit and next steps (.4); revisions to opposition to Edelman Investors' motion to intervene (1.1); communications with SEC counsel regarding clawback agreement and document production (.4).	Fates, Edward (Ted)	1.9	1,128.60	35,152.20	WO HD TR_____
10/28/19	8006954	Draft opposition to investors' motion to intervene (1.2).	Aspis, Norman	1.2	486.00	35,638.20	WO HD TR_____
10/29/19	8002553	Finalize opposition to Edelman motion to intervene, discuss same with Receiver (.9); analyze issues raised in SEC opposition to Edelman motion (.2).	Fates, Edward (Ted)	1.1	653.40	36,291.60	WO HD TR_____
10/30/19	8003570	Communications with counsel for Champion-Cain regarding property insurance issue.	Fates, Edward (Ted)	0.2	118.80	36,410.40	WO HD TR_____

Trans Date	Index	Description of Service Rendered	Timekeeper	Hours	Fees	Sum	Circle Action
10/31/19	8006293	Calls with Receiver, Champion-Cain and counsel for Champion-Cain regarding issues relating to Bandini property and First Choice bank loan.	Fates, Edward (Ted)	0.4	237.60	36,648.00	WO HD TR_____
11/01/19	8010483	Communications with Receiver and counsel for Champion-Cain regarding property tax bill for Bandini property.	Fates, Edward (Ted)	0.2	118.80	36,766.80	WO HD TR_____
11/05/19	8012569	Discuss AUSA subpoena and document production per same with Receiver (.2); analyze issues raised in Edelman reply to SEC opposition to motion to intervene (.3).	Fates, Edward (Ted)	0.5	297.00	37,063.80	WO HD TR_____
11/06/19	8012791	Analyze issues raised in Edelman reply regarding motion to intervene, advise Receiver regarding same and order taking motion off calendar (.5); call with SEC counsel and First Choice counsel regarding asset freeze over Bandini property (.3); follow-up communications regarding same (.2); communications with SEC counsel regarding revised joint motion re: Casa del Zorro (.2).	Fates, Edward (Ted)	1.2	712.80	37,776.60	WO HD TR_____
11/07/19	8014593	Work on opposition to Merit Financial motion to intervene	Fates, Edward (Ted)	2.7	1,603.80	39,380.40	WO HD TR_____
11/11/19	8019260	Work on response to Merit motion to intervene.	Fates, Edward (Ted)	0.9	534.60	39,915.00	WO HD TR_____
11/12/19	8021410	Analyze correspondence from SEC counsel to counsel for First Choice Bank regarding asset freeze and Bandini property, advise Receiver regarding same (.3); respond to inquiry from counsel for Champion-	Fates, Edward (Ted)	0.4	237.60	40,152.60	WO HD TR_____

Trans Date	Index	Description of Service Rendered	Timekeeper	Hours	Fees	Sum	Circle Action
		Cain regarding personal property at Rancho Mirage property (.1).					
11/13/19	8022205	Analyze issues raised in further correspondence from counsel for Edelman Investors regarding motion to intervene.	Fates, Edward (Ted)	0.3	178.20	40,330.80	WO HD TR_____
11/13/19	8022496	Confer with SEC counsel regarding letter/emails from counsel for Edelman Investors (.2); advise Receiver regarding issues pertaining to IRS audit of ANI 2016 tax returns (.4).	Fates, Edward (Ted)	0.6	356.40	40,687.20	WO HD TR_____
11/14/19	8090372	Call with counsel regarding Merit Financial and California Opportunity License Fund intervention motion (.2) Revise draft opposition to Merit intervention motion (.6).	Zaro, David	0.8	630.00	41,317.20	WO HD TR_____
11/14/19	8023464	Revisions to opposition to Merit Financial motion to intervene (.5); discuss same with Receiver (.4); analyze and update Receiver regarding further correspondence from G. Aguirre (.2); discuss opposition to Merit Financial motion to intervene with Receiver (.2); confer with SEC counsel regarding Merit Financial issues and correspondence from counsel for Edelman Investors (.3).	Fates, Edward (Ted)	1.6	950.40	42,267.60	WO HD TR_____
11/15/19	8024837	Address issues regarding Champion-Cain personal property at Rancho Mirage property (.2); update Receiver regarding SEC document request and production issues (.1); initial review of	Fates, Edward (Ted)	0.9	534.60	42,802.20	WO HD TR_____

Trans Date	Index	Description of Service Rendered	Timekeeper	Hours	Fees	Sum	Circle Action
		ANICO motion to intervene, advise Receiver regarding same (.6).					
11/18/19	8026382	Revise and finalize opposition to Merit Financial motion to intervene (.4); work on Receiver's declaration in support of opposition (.4); discuss same with Receiver (.2); analyze issues raised in SEC opposition brief (.3).	Fates, Edward (Ted)	1.3	772.20	43,574.40	WO HD TR_____
11/18/19	8027488	TC with IRS re. tax audit of ANI.	Kraus, Katherine	0.7	456.75	44,031.15	WO HD TR_____
11/19/19	8027848	Communications with G. Rodriguez and SEC counsel regarding SEC subpoena and document production (.4); communications with counsel for Edelman Investors and SEC counsel regarding issues relating to investors' request to join Edelman Investors' motion to intervene (.4); review proposed joint motion regarding same (.3).	Fates, Edward (Ted)	1.1	653.40	44,684.55	WO HD TR_____
11/20/19	8029652	Communications with Receiver and counsel for Champion-Cain regarding personal items to be retrieved from receivership properties.	Fates, Edward (Ted)	0.4	237.60	44,922.15	WO HD TR_____
11/21/19	8030323	Communications with counsel for Champion-Cain regarding insurance for Bandini property.	Fates, Edward (Ted)	0.1	59.40	44,981.55	WO HD TR_____
11/25/19	8033458	Analyze issues raised in Merit Financial reply regarding motion to intervene (.2); call with Receiver, AUSA and SEC counsel regarding issues relating to investor loss calculation and forensic accounting (.4); analyze issues raised in further	Fates, Edward (Ted)	0.8	475.20	45,456.75	WO HD TR_____

Trans Date	Index	Description of Service Rendered	Timekeeper	Hours	Fees	Sum	Circle Action
		correspondence from G. Aguirre (.2).					
11/26/19	8035018	Communications with counsel for Champion-Cain regarding notice received relating to insurance coverage.	Fates, Edward (Ted)	0.1	59.40	45,516.15	WO HD TR_____
12/02/19	8040451	Communications with Receiver and SEC counsel regarding document production issues (.4); communications with Receiver and counsel for Champion-Cain regarding pick up of personal items at Rancho Mirage property (.4).	Fates, Edward (Ted)	0.8	475.20	45,991.35	WO HD TR_____
12/13/19	8061271	Calls with several investors related to the case, class actions and claims (.4).	Zaro, David	0.4	315.00	46,306.35	WO HD TR_____
12/18/19	8057640	Address issues regarding opposition to ANICO motion to intervene (.3); communications with SEC counsel and G. Aguirre regarding proposed joint motion (.2).	Fates, Edward (Ted)	0.5	297.00	46,603.35	WO HD TR_____
12/23/19	8064162	Confer with SEC counsel regarding ANICO motion to intervene.	Fates, Edward (Ted)	0.2	118.80	46,722.15	WO HD TR_____

**Disbursements for Matter 378827-00002 (SEC v. Champion-Cain - General Receivership)**

Trans Date	Index	Type	Quantity	Amt	Circle Action
09/01/19	2577204	Document Search - - WellsOne, PACER ^7/01/2019-9/30/2019 4406104-032019 AP CARD.^4406104Q32019	1.00	4.70	WO HD TR_____
09/05/19	2557905	Messenger -- Federal Express Invoice No: 673604266 0313 Ship To: Paul S Metsch, Esq	1.00	12.89	WO HD TR_____
09/05/19	2557906	Messenger -- Federal Express Invoice No: 673604266 0313 Ship To:	1.00	12.89	WO HD TR_____



Trans Date	Index	Type	Quantity	Amt	Circle	Action
09/06/19	2557626	Filing Fees - - USDC Central District of California, Filing fee for Notice of Receivership^CRE-301665	1.00	47.00	WO	HD TR_____
09/06/19	2557627	Filing Fees - - USDC Eastern District of California, Filing fee for Notice of Receivership^CRE-301665	1.00	47.00	WO	HD TR_____
09/06/19	2561939	Filing Fees - - Nationwide Legal, LLC, USDC/SAN FRANCISCO NORTHERN DIST., NOTICE OF APPOINTMENT^198732	1.00	164.00	WO	HD TR_____
09/09/19	2560851	Messenger - - Nationwide Legal, LLC, USDC, SOUTHERN DISTRICT, DELIVER COURTESY^11952	1.00	75.00	WO	HD TR_____
09/11/19	2557063	Duplication	16.00	1.60	WO	HD TR_____
09/11/19	2561940	Service of Process - - Nationwide Legal, LLC, BANNER BANK, SUBPOENA SERVE^198732	1.00	115.00	WO	HD TR_____
09/11/19	2561941	Service of Process - - Nationwide Legal, LLC, BANK DIRECT, SUBPOENA SERVE^198732	1.00	347.50	WO	HD TR_____
09/11/19	2561942	Service of Process - - Nationwide Legal, LLC, CALPRIVATE BANK, SUBPOENA SERVE^198732	1.00	204.75	WO	HD TR_____
09/11/19	2561943	Service of Process - - Nationwide Legal, LLC, CITY NATIONAL BANK, SUBPOENA SERVE^198732	1.00	115.00	WO	HD TR_____
09/11/19	2561944	Service of Process - - Nationwide Legal, LLC, ENDEAVOR BANK, SUBPOENA SERVE^198732	1.00	204.75	WO	HD TR_____
09/11/19	2561945	Service of Process - - Nationwide Legal, LLC, FIRST CHOICE BANK, SUBPOENA SERVE^198732	1.00	183.75	WO	HD TR_____
09/11/19	2561946	Service of Process - - Nationwide Legal, LLC, UNION BANK, SUBPOENA SERVE^198732	1.00	185.00	WO	HD TR_____
09/11/19	2561947	Service of Process - - Nationwide Legal, LLC, WESTERN ALLIANCE BANK, SUBPOENA SERVE^198732	1.00	185.00	WO	HD TR_____
09/12/19	2556699	Filing Fees - - Clerk, USDC, Northern District of Illinois	1.00	47.00	WO	HD TR_____

Trans Date	Index	Type	Quantity	Amt	Circle	Action
09/12/19	2559630	Messenger -- Federal Express Invoice No: 674353453 2369 Ship To: Clerk of the Court	1.00	29.67	WO	HD TR_____
09/12/19	2559631	Messenger -- Federal Express Invoice No: 674353453 0313 Ship To:	1.00	12.86	WO	HD TR_____
09/12/19	2560200	Duplication	172.00	17.20	WO	HD TR_____
09/13/19	2557372	Production of Documents - - MUFG Union Bank, N.A., Production of Records^91319	1.00	106.40	WO	HD TR_____
09/13/19	2559632	Messenger -- Federal Express Invoice No: 674353453 0739 Ship To: Steven Strauss	1.00	13.34	WO	HD TR_____
09/13/19	2559633	Messenger -- Federal Express Invoice No: 674353453 2369 Ship To: Norman Aspis	1.00	27.64	WO	HD TR_____
09/13/19	2561948	Service of Process - - Nationwide Legal, LLC, CR/RIVERSIDE COUNTY RECORDER, ORDER^198732	1.00	231.50	WO	HD TR_____
09/13/19	2561949	Service of Process - - Nationwide Legal, LLC, CR/SONOMA COUNTY RECORDER, ORDER^198732	1.00	339.00	WO	HD TR_____
09/13/19	2561950	Service of Process - - Nationwide Legal, LLC, CR/MONTEREY COUNTY RECORDER, ORDER^198732	1.00	350.00	WO	HD TR_____
09/13/19	2561951	Service of Process - - Nationwide Legal, LLC, CR/YOLO COUNTY SUPERIOR, ORDER^198732	1.00	331.80	WO	HD TR_____
09/16/19	2559634	Messenger -- Federal Express Invoice No: 674353453 2369 Ship To: Justin Hoech	1.00	12.89	WO	HD TR_____
09/16/19	2559635	Messenger -- Federal Express Invoice No: 674353453 2369 Ship To: Cynthia D Stelzer	1.00	12.69	WO	HD TR_____
09/16/19	2559636	Messenger -- Federal Express Invoice No: 674353453 2369 Ship To: Simone & Associates	1.00	12.89	WO	HD TR_____
09/16/19	2565039	Telephonic Court Appearance - - CourtCall, LLC, San Diego Superior Court - Judge Kenneth Medel - 10/1819^10084467	1.00	94.00	WO	HD TR_____
09/16/19	2571894	Messenger - - Nationwide Legal, LLC, ^199512	1.00	55.50	WO	HD TR_____

Trans Date	Index	Type	Quantity	Amt	Circle	Action
09/17/19	2571924	Filing Fees - - Nationwide Legal, LLC, Record Certified Copy of Order ^SD40125^SD35758	1.00	87.00	WO	HD TR_____
09/17/19	2589250	Filing Fees - - Nationwide Legal, LLC, SD35758 CR/SAN DIEGO COUNTY RECORDER, Record Certified Copy of Order^12256	1.00	87.00	WO	HD TR_____
09/19/19	2562340	Messenger -- Federal Express Invoice No: 675150698 2369 Ship To: Todd & Tishri Bartlett Diaz	1.00	17.41	WO	HD TR_____
09/19/19	2562341	Messenger -- Federal Express Invoice No: 675150698 2369 Ship To: Tony Moayed	1.00	17.65	WO	HD TR_____
09/20/19	2571926	Document Research - - Nationwide Legal, LLC, Please get two (2) certified copies of docket number 6 entitled: ORDER; GRANTING THE PARTIES JOINT MOTION AND STIPULATED REQUEST BY ALL PARTIES FOR A PRELIMINARY INJUNCTION ORDER AND ORDER (1) FREEZING ASSETS; (2) REQUIRING ACCOUNTINGS; (3) PROHIBITING TH^SD36017	1.00	40.00	WO	HD TR_____
09/20/19	2589249	Messenger - - Nationwide Legal, LLC, USDC/SOUTHERN DISTRICT OF CALIFORNIA^12256	1.00	40.00	WO	HD TR_____
09/23/19	2571927	Filing Fees - - Nationwide Legal, LLC, Record Certified Copy of OrderSD40125^SD36123	1.00	77.00	WO	HD TR_____
09/23/19	2589251	Filing Fees - - Nationwide Legal, LLC, CR/SAN DIEGO COUNTY RECORDER^12256	1.00	77.00	WO	HD TR_____
09/24/19	2560199	Duplication	269.00	26.90	WO	HD TR_____
09/24/19	2560201	Duplication	1.00	0.10	WO	HD TR_____
09/24/19	2560202	Reprographics - Color	5.00	0.50	WO	HD TR_____
09/24/19	2571903	Messenger - - Nationwide Legal, LLC, ^199512	1.00	96.50	WO	HD TR_____
09/24/19	2571904	Filing Fees - - Nationwide Legal, LLC, ^199512	1.00	85.50	WO	HD TR_____
09/25/19	2571905	Messenger - - Nationwide Legal, LLC, ^199512	1.00	97.50	WO	HD TR_____

Trans Date	Index	Type	Quantity	Amt	Circle	Action
09/26/19	2560544	Filing Fees - - Clerk U.S. District Court, For Misc. Filing - USDC District of Arizona^92619	1.00	47.00	WO	HD TR_____
09/26/19	2565767	Messenger -- Federal Express Invoice No: 675818953 0820 Ship To: Clerk of the Court	1.00	14.88	WO	HD TR_____
09/30/19	2565752	Messenger -- Federal Express Invoice No: 675817102 0313 Ship To: Wendy Payne, Sr Collector	1.00	12.74	WO	HD TR_____
09/30/19	2565753	Messenger -- Federal Express Invoice No: 675817102 0313 Ship To: Dale Heyden	1.00	12.74	WO	HD TR_____
09/30/19	2571895	Service of Process - - Nationwide Legal, LLC, SUBPOENA FOR RECORDS^199512	1.00	223.00	WO	HD TR_____
09/30/19	2571896	Service of Process - - Nationwide Legal, LLC, SUBPOENA FOR RECORDS^199512	1.00	185.00	WO	HD TR_____
09/30/19	2571897	Service of Process - - Nationwide Legal, LLC, SUBPOENA FOR RECORDS^199512	1.00	202.15	WO	HD TR_____
09/30/19	2571898	Service of Process - - Nationwide Legal, LLC, SUBPOENA FOR RECORDS^199512	1.00	115.00	WO	HD TR_____
09/30/19	2571899	Service of Process - - Nationwide Legal, LLC, SUBPOENA FOR RECORDS^199512	1.00	195.00	WO	HD TR_____
09/30/19	2571900	Service of Process - - Nationwide Legal, LLC, SUBPOENA FOR RECORDS^199512	1.00	185.00	WO	HD TR_____
09/30/19	2571901	Service of Process - - Nationwide Legal, LLC, SUBPOENA FOR RECORDS^199512	1.00	185.00	WO	HD TR_____
09/30/19	2571902	Service of Process - - Nationwide Legal, LLC, SUBPOENA FOR RECORDS^199512	1.00	185.00	WO	HD TR_____
09/30/19	2593298	Messenger - - Nationwide Legal, LLC, Credit^12256CM	1.00	(40.00)	WO	HD TR_____
09/30/19	2593299	Filing Fees - - Nationwide Legal, LLC, Credit^12256CM	1.00	(87.00)	WO	HD TR_____
09/30/19	2593300	Filing Fees - - Nationwide Legal, LLC, Credit^12256CM	1.00	(77.00)	WO	HD TR_____

Trans Date	Index	Type	Quantity	Amt	Circle	Action
09/30/19	2594741	Document Research - - Nationwide Legal, LLC, SD Office^12256	1.00	98.00	WO	HD TR_____
10/01/19	2566849	File Conversion - E-Discovery - - CS Disco Inc., Monthly Hosting for October 2019^68652	1.00	205.00	WO	HD TR_____
10/04/19	2565287	Filing Fees - - One Legal, LLC, Superior Court of CA, SD County - Substitution of Attorney^12057595	1.00	12.95	WO	HD TR_____
10/04/19	2567655	Duplication	600.00	60.00	WO	HD TR_____
10/04/19	2571783	Messenger - - Nationwide Legal, LLC, USDC, Southern District, Delivery Courtesy^12566	1.00	16.00	WO	HD TR_____
10/07/19	2567656	Duplication	1.00	0.10	WO	HD TR_____
10/09/19	2567657	Duplication	700.00	70.00	WO	HD TR_____
10/10/19	2567658	Duplication	1,230.00	123.00	WO	HD TR_____
10/10/19	2567659	Reprographics - Color	12.00	1.20	WO	HD TR_____
10/10/19	2568835	Messenger -- Federal Express Invoice No: 677230368 2369 Ship To: William Hamilton	1.00	17.48	WO	HD TR_____
10/11/19	2566715	Filing Fees - - Clerk, U.S. District Court, Filing Fee for Misc Filing - USDC, Eastern District of Michigan^101119	1.00	47.00	WO	HD TR_____
10/11/19	2568836	Messenger -- Federal Express Invoice No: 677230368 2369 Ship To: Sherri K Balzer President	1.00	25.65	WO	HD TR_____
10/11/19	2568837	Messenger -- Federal Express Invoice No: 677230368 2369 Ship To: Loss Mitigation Dept	1.00	20.10	WO	HD TR_____
10/11/19	2568838	Messenger -- Federal Express Invoice No: 677230368 2369 Ship To: Michael E Turk Gen Mgr	1.00	12.74	WO	HD TR_____
10/11/19	2568839	Messenger -- Federal Express Invoice No: 677230368 2369 Ship To: David Wilkinson, Esq	1.00	12.74	WO	HD TR_____
10/11/19	2569704	Messenger -- Federal Express Invoice No: 677232338 0820 Ship To: Clerk of the Court	1.00	33.93	WO	HD TR_____

Trans Date	Index	Type	Quantity	Amt	Circle	Action
10/14/19	2567660	Reprographics - Color	1.00	0.10	WO	HD TR_____
10/15/19	2571784	Messenger - - Nationwide Legal, LLC, USDC, Southern District, Delivery Courtesy^12566	1.00	11.35	WO	HD TR_____
10/17/19	2570390	Messenger -- Federal Express Invoice No: 677884921 2369 Ship To: Joelle Hanson and Michael Mart	1.00	17.61	WO	HD TR_____
10/17/19	2570391	Messenger -- Federal Express Invoice No: 677884921 2369 Ship To: As Agents for Janine Jadallah	1.00	12.89	WO	HD TR_____
10/18/19	2574390	Telephonic Court Appearance - - CourtCall, LLC, SD Superior Court - Judge Kenneth J. Medel - 3/20/20^10131808	1.00	94.00	WO	HD TR_____
10/21/19	2570019	Reprographics - Color	12.00	1.20	WO	HD TR_____
10/22/19	2570392	Messenger -- Federal Express Invoice No: 677884921 2369 Ship To: Hakan Misirlioglu	1.00	17.45	WO	HD TR_____
10/23/19	2579456	Service of Process - - Nationwide Legal, LLC, BUCHANAN INGERSOLL & ROONEY, SUBPOENA FOR RECORDS^201508	1.00	182.70	WO	HD TR_____
10/23/19	2579457	Service of Process - - Nationwide Legal, LLC, ALPHA SURETY & INSURANCE BROKERAGE, SUBPOENA FOR RECORDS^201508	1.00	226.00	WO	HD TR_____
10/23/19	2579615	Service of Process - - Nationwide Legal, LLC, WILLIAM ANTHONY ADAMS, SUBPOENA FOR RECORDS^200762	1.00	206.30	WO	HD TR_____
10/23/19	2579616	Service of Process - - Nationwide Legal, LLC, NORTON MOORE ADAMS, SUBPOENA FOR RECORDS^200762	1.00	73.55	WO	HD TR_____
10/23/19	2579617	Service of Process - - Nationwide Legal, LLC, BAYMEDICA, SUBPOENA FOR RECORDS^200762	1.00	311.24	WO	HD TR_____
10/24/19	2574459	Messneger -- Federal Express Invoice No: 682639146 2369 Ship To: Holly Perttula	1.00	17.45	WO	HD TR_____
10/24/19	2574471	Messneger -- Federal Express Invoice No: 682640818 1665 Ship To: Daniel Champion	1.00	25.60	WO	HD TR_____

Trans Date	Index	Type	Quantity	Amt	Circle	Action
10/25/19	2571454	Duplication	781.00	78.10	WO	HD TR_____
10/25/19	2571455	Reprographics - Color	3.00	0.30	WO	HD TR_____
10/25/19	2574460	Messneger -- Federal Express Invoice No: 682639146 2369 Ship To: Eric Swanson	1.00	12.72	WO	HD TR_____
11/01/19	2576304	File Conversion - E-Discovery - - CS Disco Inc., Monthly Hosting for November 2019^70769	1.00	150.00	WO	HD TR_____
11/05/19	2575639	Messenger -- Federal Express Invoice No: 683285884 2369 Ship To: Cynthia Stelzer	1.00	12.72	WO	HD TR_____
11/05/19	2579378	Messenger -- Federal Express Invoice No: 684589960 2369 Ship To: Nathaniel Noone, CEO	1.00	12.72	WO	HD TR_____
11/05/19	2579395	Messenger - - Nationwide Legal, LLC, USDC/SOUTHERN DISTRICT OF CALIFORNIA, P/U AND DELIVER COURTESY COPIES^13445	1.00	17.75	WO	HD TR_____
11/06/19	2579458	Service of Process - - Nationwide Legal, LLC, WELLS FARGO BANK, SUBPOENA^201508	1.00	173.25	WO	HD TR_____
11/06/19	2579459	Service of Process - - Nationwide Legal, LLC, BANK OF AMERICA, SUBPOENA^201508	1.00	105.00	WO	HD TR_____
11/06/19	2579460	Service of Process - - Nationwide Legal, LLC, BANKDIRECT, SUBPOENA^201508	1.00	328.75	WO	HD TR_____
11/08/19	2579379	Messenger -- Federal Express Invoice No: 684589960 2369 Ship To: Dean T Kirby, Jr	1.00	12.72	WO	HD TR_____
11/14/19	2579461	Service of Process - - Nationwide Legal, LLC, CHICAGO TITLE, SUBPOENA^201508	1.00	201.60	WO	HD TR_____
11/14/19	2579462	Service of Process - - Nationwide Legal, LLC, NATIONS DIRECT MORTGAGE, SUBPOENA^201508	1.00	185.00	WO	HD TR_____
11/15/19	2579380	Messenger -- Federal Express Invoice No: 684589960 2369 Ship To: Steve Waldron	1.00	12.69	WO	HD TR_____



Trans Date	Index	Type	Quantity	Amt	Circle	Action
11/16/19	2579387	Messenger -- Federal Express Invoice No: 684589960 2369 Ship To: NORMAN ASPIS	1.00	13.10	WO	HD TR_____
11/18/19	2579199	Duplication	1.00	0.10	WO	HD TR_____
11/20/19	2581388	Messenger Invoice No: 685343206 Paid to: Fedex per 002369 Ship To: Michael Ferguson Ship Dt: 11/20/19 Airbill: 778191182691	1.00	12.62	WO	HD TR_____
11/20/19	2581389	Messenger Invoice No: 685343206 Paid to: Fedex per 002369 Ship To: Joshua Bunton Ship Dt: 11/20/19 Airbill: 778191223581	1.00	12.69	WO	HD TR_____
11/21/19	2578721	Other Court Charges - - Los Angeles Superior Court, Obtain various documents from court's website re Analysis of Third Party Claims.^CRE-302209	1.00	68.00	WO	HD TR_____
11/21/19	2587467	Service of Process - - Nationwide Legal, LLC, CITY NATIONAL BANK^202205	1.00	105.00	WO	HD TR_____
11/21/19	2587468	Service of Process - - Nationwide Legal, LLC, JP MORGAN CHASE BANK^202205	1.00	51.00	WO	HD TR_____
11/21/19	2587469	Service of Process - - Nationwide Legal, LLC, MUFG UNION BANK^202205	1.00	165.00	WO	HD TR_____
11/21/19	2587470	Service of Process - - Nationwide Legal, LLC, WELLS FARGO BANK^202205	1.00	51.00	WO	HD TR_____
11/22/19	2581386	Messenger Invoice No: 685343206 Paid to: Fedex per 002369 Ship To: Cynthia D Stelzer Ship Dt: 11/22/19 Airbill: 778247701142	1.00	12.69	WO	HD TR_____
11/22/19	2581387	Messenger Invoice No: 685343206 Paid to: Fedex per 002369 Ship To: Mary Murphy Rice Ship Dt: 11/22/19 Airbill: 778247871900	1.00	12.69	WO	HD TR_____
11/23/19	2581390	Messenger Invoice No: 685343206 Paid to: Fedex per 002369 Ship To: return norman aspis Ship Dt: 11/23/19 Airbill: 120347408448	1.00	13.10	WO	HD TR_____



Trans Date	Index	Type	Quantity	Amt	Circle	Action
12/01/19	2582962	File Conversion - E-Discovery - - CS Disco Inc., Monthly Hosting for December 2019^73068	1.00	150.20	WO	HD TR_____
12/03/19	2581651	Messenger -- Federal Express Invoice No: 685977917 2369 Ship To: Anthony Taylor	1.00	17.38	WO	HD TR_____
12/04/19	2584769	Messenger - - Nationwide Legal, LLC, USDC/SOUTHERN DISTRICT, DELIVER COURTESY COPY^14009	1.00	17.75	WO	HD TR_____
12/04/19	2584770	Messenger - - Nationwide Legal, LLC, USDC/SOUTHERN DISTRICT, DELIVER COURTESY COPY^14009	1.00	17.75	WO	HD TR_____
12/09/19	2582601	Messenger -- Federal Express Invoice No: 686631244 2369 Ship To: Anthony Taylor	1.00	17.41	WO	HD TR_____
12/09/19	2584680	Service of Process - - Nationwide Legal, LLC, ANTHONY TAYLOR, SUBPOENA^202807	1.00	403.05	WO	HD TR_____
12/10/19	2584681	Service of Process - - Nationwide Legal, LLC, WESTERN ALLIANCE BANK, SUBPOENA^202807	1.00	159.85	WO	HD TR_____
12/12/19	2584355	Messenger -- Federal Express Invoice No: 687371695 1665 Ship To: Karen Hagen	1.00	12.89	WO	HD TR_____
12/12/19	2584771	Messenger - - Nationwide Legal, LLC, USDC/SOUTHERN DISTRICT, DELIVER COURTESY COPY^14009	1.00	11.35	WO	HD TR_____
12/12/19	2584772	Messenger - - Nationwide Legal, LLC, USDC/SOUTHERN DISTRICT, OBTAIN CERTIFIED COPIES^14009	1.00	38.50	WO	HD TR_____
12/16/19	2584356	Messenger -- Federal Express Invoice No: 687371695 1665 Ship To: Karen Hagen	1.00	12.89	WO	HD TR_____
12/17/19	2584971	Reprographics - Color	176.00	17.60	WO	HD TR_____
12/17/19	2585223	Duplication	203.00	20.30	WO	HD TR_____
12/17/19	2591400	Document Search - - Wells One -Corporate Filings, CA SECOFSTATE UCCSERVICES - UCC Document Search^CRWF	1.00	4.00	WO	HD TR_____

Trans Date	Index	Type	Quantity	Amt	Circle	Action
12/17/19	2591401	Document Search - - Wells One -Corporate Filings, CA SECOFSTATE UCCSERVICES - UCC document search^CRWF	1.00	5.00	WO	HD TR_____
12/18/19	2589125	Other Court Charges - - San Diego Superior Court, Obtain copy of Complaint from Court website.^CRE-300820	1.00	8.48	WO	HD TR_____
12/19/19	2585401	Messenger Invoice No: 688146801 Paid to: Fedex per 002369 Ship To: Ryan T Kuhn Ship Dt: 12/19/19 Airbill: 779108611927	1.00	12.69	WO	HD TR_____

### Proforma Summary

Timekeeper Number	Timekeeper	Hours	Rate	Amounts
000313	David Zaro	3.2	787.50	2,520.00
000739	Michael Farrell	9.0	715.50	6,439.50
000820	John Kaup	2.4	292.50	702.00
001665	Edward (Ted) Fates	54.6	594.00	32,432.40
002369	Norman Aspis	7.4	405.00	2,997.00
002372	Katherine Kraus	2.5	652.50	1,631.25
		79.1		46,722.15
Total Fees				46,722.15
Total Disbursements				10,409.51

### Attorney Billing Instructions

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

### Billing Instructions

expires 6/30/2020: 10% off standard rates (automatic); no text editing; copies @ .10

### Account Summary- As Of 12/31/2019

Fiscal YTD

Calendar YTD

LTD

	Total	Fees	Disbursement	Total	Fees	Disbursement	Total	Fees	Disbursement
Worked	57,741.19	46,722.15	11,019.04	57,856.67	46,722.15	11,134.52	57,856.67	46,722.15	11,134.52
Unbilled Adj	(324.00)	0.00	(324.00)	(12.00)	0.00	(12.00)	(336.00)	0.00	(336.00)
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
<b><i>WIP Balance</i></b>	<b><i>62,019.20</i></b>	<b><i>50,551.20</i></b>	<b><i>11,468.00</i></b>						
<b><i>AR Balance</i></b>	<b><i>0.00</i></b>	<b><i>0.00</i></b>	<b><i>0.00</i></b>						
<b><i>Unalloc Payment</i></b>	<b><i>0.00</i></b>								
<b><i>Client Trust Balance</i></b>	<b><i>0.00</i></b>								

### Billing Address

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

02/14/20 10:00:51 PROFORMA STATEMENT FOR MATTER 378827-00003 (Krista Freitag, as Receiver for ANI Development, LLC, et al.) (SEC v. Champion-Cain - Asset Investigation & Recovery)

### ***Preliminary Billing Form***

Billing Atty: 001665 - Edward Fates

Matter #: 378827-00003

Matter Name: SEC v. Champion-Cain - Asset Investigation & Recovery

Date of Last Billing:

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

Proforma Number 1456086

Client/Matter Joint Group # 378827-1

### **Fees for Matter 378827-00003 (SEC v. Champion-Cain - Asset Investigation & Recovery)**

Trans Date	Index	Description of Service Rendered	Timekeeper	Hours	Fees	Sum	Circle Action
09/03/19	7946915	Analyze Preliminary Injunction order and advise Receiver regarding scope of same and duties/powers (1.2); call/emails with Receiver and counsel for G. Champion-Cain regarding implementation of PI order and takeover of control/management (.7); analyze information on ANI businesses, assets and personnel in preparation for takeover meeting (.9); confer with Receiver regarding strategy and issues for takeover (.5).	Fates, Edward (Ted)	3.3	1,960.20	1,960.20	WO HD TR_____
09/04/19	7950072	Review of the Court order and complaint, follow-up on Receiver request to address Chicago Title Company/escrow account and freeze order (.7). Draft turnover demand letter to Chicago Title (.8). Several emails with Chicago Title (.6).	Zaro, David	2.1	1,653.75	3,613.95	WO HD TR_____
09/04/19	7948510	Meetings and conferences with Receiver and staff to discuss takeover plan and strategy (1.6); meetings with Champion-Cain, her counsel, and ANI personnel regarding implementation of PI Order, transition	Fates, Edward (Ted)	7.2	4,276.80	7,890.75	WO HD TR_____

Trans Date	Index	Description of Service Rendered	Timekeeper	Hours	Fees	Sum	Circle Action
		of control/management, company assets and ongoing businesses, and related issues (.4); assist and advise Receiver in securing compliance with PI Order from Chicago Title (.7).					
09/05/19	7949930	Emails/call with Receiver and counsel related to the accounts, the documents; preservation and recovery/control over assets (.4). Work on form letter to landlords and management company, respond to 3 Day Notice (.8). Call/email with counsel and CTC re CTC accounts, call with counsel (.6). Email/legal research and analysis concerning the employees/termination issues and approach to payment/PTO, advice to Receiver, draft email/memo (1.3).	Zaro, David	3.1	2,441.25	10,332.00	WO HD TR_____
09/05/19	7948535	Analyze documents re: ANI acquisition of Rancho Mirage property, communications with counsel for Champion-Cain re: ownership/control of same (.4); advise Receiver on issues re: Chicago Title accounts and balance information (.7); meeting with Receiver, Champion-Cain, CWC and J. McGrory re: Casa del Zorro, Pullman and D Street properties (1.2); meetings with Receiver and ANI personnel re: IT issues, data preservation, and related issues (1.7); communications with Endeavor Bank re: control of accounts and balance information (.4).	Fates, Edward (Ted)	4.4	2,613.60	12,945.60	WO HD TR_____

Trans Date	Index	Description of Service Rendered	Timekeeper	Hours	Fees	Sum	Circle Action
09/06/19	7951050	Emails/call related to CTC escrow accounts and follow up thereon to address turnover (.7). Call with counsel and Chicago Title counsel and officers related to escrow issues (.4). Emails/call related to CTC and related operating issues and follow up (.4). Call/email regarding leases/landlord claims, and follow up with landlord counsel (.6). Analysis/evaluate Finch lease, accounting records, assess next steps (.4). Work on the Chicago Title escrows and PTO issues including analysis of the turnover issues including research, address discovery (1.6).	Zaro, David	4.1	3,228.75	16,174.35	WO HD TR_____
09/06/19	7951051	Email/call with counsel and address lease agreements and records from third parties, including subpoenas and follow up (.6).	Zaro, David	0.6	472.50	16,646.85	WO HD TR_____
09/06/19	7949802	Prepare letters/emails with outside counsel for ANI regarding pending legal matters, funds on retainer, and related issues (1.6); communications with ANI in-house counsel regarding attorney-client privilege issues (.3); communications with G. Rodriguez and shred-it vendor regarding ANI document destruction issues (.7); analyze issues regarding insurance coverage and employee concerns regarding same, call with T. Hebrank and J. Pastore regarding same (.6); address issues with Chicago Title escrow funds and funds held in ANI	Fates, Edward (Ted)	4.5	2,673.00	19,319.85	WO HD TR_____

Trans Date	Index	Description of Service Rendered	Timekeeper	Hours	Fees	Sum	Circle	Action
		accounts at Chase (.4); analyze Chicago Title escrow agreement and issues regarding turnover of escrow funds (.6); discuss issues and strategy regarding locating investor database within ANI system with Receiver (.3).						
09/07/19	7950351	Discuss document subpoenas for bank records, preservation letters to vendors, and recording of PI order on properties with Receiver (1.1); initial work on document subpoenas, confer with counsel regarding same (.4); initial work on property recordings (.4); advise Receiver regarding issues concerning ANI payment to defense counsel for G. Champion-Cain (.3); communication to counsel for Champion-Cain regarding same (.3); discuss recovery of offsite documents and legal issues re same with Receiver (.3).	Fates, Edward (Ted)	2.8	1,663.20	20,983.05	WO	HD TR_____
09/08/19	7951166	Analysis of documents and records related to the operations issues/banks and recovery and control of assets (1.4).	Zaro, David	1.4	1,102.50	22,085.55	WO	HD TR_____
09/08/19	7950442	Prepare subpoenas to various financial institutions (2.2).	Aspis, Norman	2.2	891.00	22,976.55	WO	HD TR_____
09/09/19	7953032	Review/revise/evaluate the numerous draft subpoenas to financial institutions, evaluate strategy, scope and several emails related to the same (1.4). Conference with counsel related to investor groups investigation (.4). Call with investor	Zaro, David	2.8	2,205.00	25,181.55	WO	HD TR_____

Trans Date	Index	Description of Service Rendered	Timekeeper	Hours	Fees	Sum	Circle Action
		concerning background, investor groups (.4). Analysis of issues re escrow/emails with CTC counsel (.6).					
09/09/19	7952097	Communications with Receiver and counsel for various banks and vendors regarding preservation and production of documents and turnover of funds held for ANI entities (1.6); call with SEC counsel, finalize and send access letter (.5); communications with Receiver and counsel for Champion-Cain regarding recovery of retainer balance (.6); communications with Receiver and counsel regarding demand to be issued to Chicago Title (.4).	Fates, Edward (Ted)	3.1	1,841.40	27,022.95	WO HD TR_____
09/09/19	7957597	Confer with counsel regarding subpoenas (.2); confer with financial institutions to confer agent for service of process (.3); revise subpoenas (.5).	Aspis, Norman	1.0	405.00	27,427.95	WO HD TR_____
09/10/19	7954757	Emails with Receiver and counsel related to the turnover of CTC accounts and draft letter to CTC.	Zaro, David	0.8	630.00	28,057.95	WO HD TR_____
09/10/19	7954233	Analysis of life insurance documents and prepare spreadsheet summary; analysis of information regarding real property holdings.	Kaup, John	3.3	965.25	29,023.20	WO HD TR_____
09/10/19	7952399	Call with Champion-Cain and Receiver regarding flow of investor funds through investor entities to ANI accounts (.9); communications with counsel for banks holding ANI accounts regarding freeze/turnover of funds to Receiver (.8);	Fates, Edward (Ted)	4.4	2,613.60	31,636.80	WO HD TR_____



Trans Date	Index	Description of Service Rendered	Timekeeper	Hours	Fees	Sum	Circle	Action
		communications with Receiver and L. Ryan regarding same (.3); call with outside counsel for ANI regarding real estate, finance, and investment transactions, documents relating to same (1.2); discuss Dash Wagon investment with Receiver (.2); initial review/analysis of ANI life insurance policies (.4); communications with counsel for Champion-Cain regarding recovery of retainer funds (.4); revisions to document subpoenas to be issued to banks (.2).						
09/11/19	7955559	Analysis of documents from Mr. Mandel/follow up thereon as to loan scheme (.6). Calls with Receiver/counsel as to the Synapses Investment Partners Inc./SIP (.4). Call with Mr. Berengolts related to the SEALED/SIP systems and follow up as to his investment and follow up (.6). Follow up on the issues related to subpoenas and the issuance matters (.5). Call with counsel for Synetra Life/lender on the Lamont property and follow up (.3). Call with FBI as to the subpoena of records/address attorney/client privilege issues (.3). Call with counsel for Sider/Synapses as to software and investor data and follow up thereon with Receiver (.8)	Zaro, David	3.5	2,756.25	34,393.05	WO	HD TR_____
09/11/19	7955853	Calls/emails with Chicago Title counsel related to accounts/turnover (.7). Analysis of issues related to turnover/ex parte application meeting	Zaro, David	2.5	1,968.75	36,361.80	WO	HD TR_____

Trans Date	Index	Description of Service Rendered	Timekeeper	Hours	Fees	Sum	Circle	Action
		with counsel and Receiver/court rules and follow up (1.2). Call with counsel/emails regarding turnover and call with Receiver (.6).						
09/11/19	7955333	Review of life insurance files; analysis of real estate holdings and preparation of recordings of receivership role.	Kaup, John	2.8	819.00	37,180.80	WO	HD TR_____
09/11/19	7953721	Call with counsel for CalPrivate Bank re: loan and security interests, production of loan documents (.4); advise Receiver re: same (.2); revisions to document subpoenas to be issued to banks (.3); call with ANI in-house counsel re: Swell Coffee trademark issues (.3); analyze D&O insurance issues, discuss same with Receiver, T. Hebrank, and insurance broker (.6); review notice of assets held for benefit of ANI provided by counsel for CWC Casa del Zorro (.3); advise on issues relating to Chicago Title and failure to turn over funds in ANI accounts, potential ex parte application to address same (.7); analyze information from J. Lance re: joint ownership interest in San Rafael property (.2); meet and confer communications with SEC counsel re: Chicago Title issues (.2); call/emails with counsel for investors (.4).	Fates, Edward (Ted)	3.6	2,138.40	39,319.20	WO	HD TR_____
09/11/19	7957450	Confer with counsel regarding ex parte application to compel the turnover of funds to the Receiver (.3).	Aspis, Norman	0.3	121.50	39,440.70	WO	HD TR_____
09/11/19	7957453	Revise and prepare subpoenas to	Aspis, Norman	1.1	445.50	39,886.20	WO	HD TR_____

Trans Date	Index	Description of Service Rendered	Timekeeper	Hours	Fees	Sum	Circle Action
		financial institutions for service (1.1).					
09/12/19	7959471	Analysis of documents related to the investor loans an documentation, the guaranties, follow-up calls/emails with counsel (1.6). Review/analysis of escrow issues, the claims related to Chicago Title, ex parte application and advice to counsel re strategy (1.3).	Zaro, David	2.9	2,283.75	42,169.95	WO HD TR_____
09/12/19	7974377	Conference and analysis re: receivership's financial condition (.3); participation in conference call with SEC counsel (.4); conference and analysis re: results of same (.3); various telephone conferences with court clerk and review of authorities re: ex parte application procedures and analysis re: same (.9); conference, analysis and review of correspondence re: CalPrivate Bank and role of same in receivership (.4); preparation for and participation in conference call with client re: evidence to support ex parte application and strategy issues (.9); numerous conferences, telephone conferences, review of documents and exchange of e-mails re: ex parte application issues (1.8); review, analysis and revision of draft Freitag declaration and exchanged various e-mails re: same (.8); conference, analysis and exchange of e-mails re: filing of complaint and appointment order in additional jurisdictions (.4); analysis and exchange of	Farrell, Michael	7.5	5,366.25	47,536.20	WO HD TR_____

Trans Date	Index	Description of Service Rendered	Timekeeper	Hours	Fees	Sum	Circle	Action
		correspondence with S. Strauss re: account and application issues (.4); initial review and analysis of ex parte application and conference re: revisions to same (.9).						
09/12/19	7956736	Continue analysis of real estate holding for recording of order; revise spreadsheets regarding life insurance policies; conference with Attorney Fates; review and respond to emails.	Kaup, John	2.8	819.00	48,355.20	WO	HD TR_____
09/12/19	7955164	Advise Receiver regarding Padres season ticket cancellations and efforts to recover amounts paid (.3); calls with Receiver and SEC counsel regarding Chicago Title failure to comply, potential ex parte application, and related issues (.7); advise on content and strategy for ex parte application, communications with court clerk and counsel for Chicago Title (1.3); call with Receiver regarding ex parte application and declaration in support (.7); analyze information regarding life insurance policies, discuss same with Receiver (.4); revisions to Receiver declaration in support of ex parte application (.5).	Fates, Edward (Ted)	3.9	2,316.60	50,671.80	WO	HD TR_____
09/13/19	7959501	Email/call concerning several 3-day notice/landlord issues, follow-u to analyze communications, address the letters to landlord (.7). Analysis of Symetra Life Insurance Co. deed of trusts, email from counsel (.4). Calls with counsel and Receiver to coordinate the response to Chicago Title turnover of funds (.8). Review of	Zaro, David	3.4	2,677.50	53,349.30	WO	HD TR_____

Trans Date	Index	Description of Service Rendered	Timekeeper	Hours	Fees	Sum	Circle Action
		declaration, advice to counsel and numerous emails concerning strategy (1.5).					
09/13/19	7974537	Conference and analysis re: ex parte application issues (.3); review, analysis and revision of application and supporting documents, including numerous conferences and exchange of e-mails re: same (2.3); review and analysis of S. Strauss proposal and exchanged e-mails re: same (.3); conference call and analysis re: strategy for positions taken in application (.4); telephone conference with SEC counsel and e-mail to defense counsel re: Strauss proposal (.4); telephone conference with S. Strauss and K. Wanner re: Strauss proposal and exchanged e-mails re: same (.5); reviewed e-mail and attached document re: K. Peterson entity involuntary bankruptcy and analysis re: effect of same on application (.3); revised and finalized all application papers for filing (.6); drafted correspondence to all counsel distributing ex parte papers (.1).	Farrell, Michael	5.2	3,720.60	57,069.90	WO HD TR_____
09/13/19	7958966	Continue to research details regarding San Diego real property holdings for recording of receivership order; conference with Attorney Fates; forward details regarding real property holdings and life insurance policies.	Kaup, John	3.8	1,111.50	58,181.40	WO HD TR_____
09/13/19	7956977	Advise on ex parte application as to Chicago Title and revisions to same	Fates, Edward (Ted)	4.2	2,494.80	60,676.20	WO HD TR_____

Trans Date	Index	Description of Service Rendered	Timekeeper	Hours	Fees	Sum	Circle	Action
		and supporting declarations, exhibits (1.4); analyze response to turnover demand from counsel for Chicago Title, advise Receiver regarding same (.6); communications with counsel for SEC regarding Chicago Title request to expand stay in receivership order (.4); advise regarding investigation into investor software and communications with hosting company (.3); calls with counsel for Chicago Title regarding response to subpoena issued by Receiver and confidentiality/protective order issues (.4); communications with counsel for K. Peterson regarding asset search results (.2); review same and discuss with Receiver (.2); communications with Receiver regarding recovery strategy for life insurance policies (.4); communications with counsel for Champion-Cain regarding life insurance policies held by Champion-Cain (.3).						
09/13/19	8011931	Revise ex parte application and supporting documents and confer with counsel regarding the same (5.8).	Aspis, Norman	5.8	2,349.00	63,025.20	WO	HD TR_____
09/16/19	7959537	Work with Receiver and counsel concerning the landlord notices of default (.6). Email/calls to/from Court and counsel related to the ex parte hearing (.4). Analysis of issues, Receiver accounting, advice to counsel and Receiver related to the hearing (.8). Follow-up call with	Zaro, David	2.1	1,653.75	64,678.95	WO	HD TR_____

Trans Date	Index	Description of Service Rendered	Timekeeper	Hours	Fees	Sum	Circle	Action
		Receiver concerning strategy/operating issues (.3).						
09/16/19	7959540	Advice to counsel related to the third party subpoenas, review/evaluate the outstanding subpoenas (.4). Advice concerning CTC subpoena (.3).	Zaro, David	0.7	551.25	65,230.20	WO	HD TR_____
09/16/19	7974757	Various telephone conferences, analysis and exchange of e-mails re: potential conflict issue raised by court (.5); review and analysis of cash flow document (.3); telephone conferences with court clerk re: telephonic hearing and analysis re: same (.4); reviewed minute order and exchanged e-mails re: same (.2); conference call and analysis re: strategy to address hearing (.4); drafted memorandum re: issues to be addressed on telephonic hearing (.3); participated in telephonic hearing and analysis re: results of same (.4); telephone conference with receiver re: hearing issues and strategy (.3); telephone conference with Judge Burns' clerk re: urgency for ex parte application and timing issues (.2); telephone conference and exchange of e-mails with S. Strauss re: recent developments (.5); reviewed authorities re: scope of litigation bar (.4); telephone conference and analysis re: issues to be addressed before ex parte hearing (.2).	Farrell, Michael	4.1	2,933.55	68,163.75	WO	HD TR_____
09/16/19	7960653	Review of recordings of receivership order; review and respond to emails.	Kaup, John	0.2	58.50	68,222.25	WO	HD TR_____

Trans Date	Index	Description of Service Rendered	Timekeeper	Hours	Fees	Sum	Circle	Action
09/16/19	7958023	Communications with Receiver and counsel regarding timing of telephonic conference with court on ex parte application and preparation for same (1.1); communications with Receiver regarding recovery of Thomas Street payment (.3); communications with counsel for Champion-Cain regarding access to receivership properties and turnover of payment related to Thomas Street sale (.6); update Receiver regarding same (.2); communications with SEC counsel regarding telephonic conference and court conflict issue (.1); attend telephonic hearing on ex parte application and court conflict issue (.5); initial work on stipulation regarding recovery Thomas Street payment funds (.4); call with counsel for Chicago Title regarding issues relating to ex parte application and turnover of funds (.5).	Fates, Edward (Ted)	3.7	2,197.80	70,420.05	WO	HD TR_____
09/16/19	7959035	Confer with counsel regarding joint stipulation to unfreeze certain accounts (.2); confer with financial institutions regarding subpoena status (.5); prepare tracking chart for subpoenas and transmit the same (.4).	Aspis, Norman	1.1	445.50	70,865.55	WO	HD TR_____
09/17/19	7962610	Work on issues and advice concerning the Receiver discovery, further subpoenas and turnover demands (.4). Follow-up on the landlord issues related to restaurant premises and retail/office leases and	Zaro, David	2.1	1,653.75	72,519.30	WO	HD TR_____



Trans Date	Index	Description of Service Rendered	Timekeeper	Hours	Fees	Sum	Circle	Action
		call (.7). Follow-up on the case transfer, the Receiver strategy as to lenders/landlords pending funding, advice to counsel (.8). Call with Chicago Title counsel concerning investor records (.2).						
09/17/19	7962699	Review of Court Order related to Chicago Title, conferences with counsel related to Receive response (.2).	Zaro, David	0.2	157.50	72,676.80	WO	HD TR_____
09/17/19	7961597	Finalize recording for San Diego County receivership order; review and respond to emails.	Kaup, John	0.6	175.50	72,852.30	WO	HD TR_____
09/17/19	7959197	Advise Receiver on Chicago Title issues and strategy (.2); communications with SEC counsel regarding Chicago Title and ex parte application issues (.5); call with ANI outside counsel regarding matters handled for ANI, production of documents and privilege issues (.6); communications with Receiver J. Lance regarding interests in 809 and 812 San Rafael properties (.8); analyze TIC agreement regarding 809 San Rafael (.4); address issues regarding 3-day notices from landlords (.2); work on joint motion regarding unfreezing of accounts and turnover of funds to Receiver (.8); discuss joint motion with Receiver (.2).	Fates, Edward (Ted)	3.7	2,197.80	75,050.10	WO	HD TR_____
09/17/19	7960845	Prepare and revise joint motion to turn over monies in Chase account (.8); teleconference with Banner Bank	Aspis, Norman	1.3	526.50	75,576.60	WO	HD TR_____

Trans Date	Index	Description of Service Rendered	Timekeeper	Hours	Fees	Sum	Circle	Action
		regarding subpoena and attention to other subpoena administrative issues (.5).						
09/18/19	7962741	Follow-up on emails related to document/records production, coordinate the files and subpoenas (.4). Address further landlord issues, review additional 3 day notices and responses (.4). Advice to counsel as to SD Bank records and subpoena (.3). Analysis of strategy for turnover/recovery of CTC funds based upon CTC response, Court order, Receiver operations, calls/emails with Receiver and counsel as to legal strategy (1.4). Revise draft letter related to turnover and follow-up advice to Receiver (.4).	Zaro, David	2.9	2,283.75	77,860.35	WO	HD TR_____
09/18/19	7975989	Conference call with client re: strategy to address scheduling and funding issues (.4); reviewed various e-mails and materials from client (.3); analysis and exchange of e-mails with S. Strauss re: potential call (.2); conferences, analysis and review of authorities re: procedural issues for magistrate recommendations and potential alternatives (.8); telephone conference and analysis re: calculation of estate's short term financial needs (.3); drafted correspondence to S. Strauss and distributed same for comment (1.4); conference and analysis re: potential edits and revised draft letter (.3); review and analysis of additional	Farrell, Michael	4.4	3,148.20	81,008.55	WO	HD TR_____

Trans Date	Index	Description of Service Rendered	Timekeeper	Hours	Fees	Sum	Circle	Action
		comments and revised/finalized letter (.2); analysis and exchange of e-mails re: scope of distribution of letter (.2); review, analysis and exchange of e-mails with court clerk and S. Strauss re: proposed order (.3).						
09/18/19	7963000	Check status of recordings of receivership order.	Kaup, John	0.1	29.25	81,037.80	WO HD	TR_____
09/18/19	7961046	Confer with Receiver and advise on Chicago Title, ex parte application timing and operation cash flow issues (.8); communications with counsel for Endeavor Bank regarding document production per subpoena (.3); work with Receiver on revisions to letter to Chicago Title regarding failure to comply with order and impact on receivership of same (.8); advise on document production and management issues (.2); analyze document preservation issues (.2).	Fates, Edward (Ted)	2.3	1,366.20	82,404.00	WO HD	TR_____
09/18/19	7964400	Analysis and determination of client documents in preparation for attorney review.	Peng, Simona	0.3	87.75	82,491.75	WO HD	TR_____
09/18/19	7962356	Prepare for and participate in teleconference regarding subpoena to CalPrivate Bank (.3); confer with counsel regarding the same (.2); confer with landlord regarding notice to pay rent or quit (.2).	Aspis, Norman	0.7	283.50	82,775.25	WO HD	TR_____
09/19/19	7966556	Analysis of lender issues, advice to counsel as to document retention letters (.4). Work with counsel to address additional discovery issues,	Zaro, David	1.7	1,338.75	84,114.00	WO HD	TR_____

Trans Date	Index	Description of Service Rendered	Timekeeper	Hours	Fees	Sum	Circle Action
		call with investor counsel related to records (.7). Analysis of issues, email related to conflicts, call to advise counsel/Receiver (.6).					
09/19/19	7966564	Advice to counsel re leases and Mission Blvd, Goldfinch and landlord rights (.4). Further advice re strategy/legal research as to turnover in light of further communications with SEC/counsel and review of additional escrow documents (.5).	Zaro, David	0.9	708.75	84,822.75	WO HD TR_____
09/19/19	7976330	Telephone conferences with S. Strauss and counsel re: turnover of funds and analysis re: Chicago position (.3); conference, analysis, exchange of e-mails and review of documents/authority re: issue of "property of" receivership entity in turnover context (1.6); telephone conference, review of Cooley documents and exchange of e-mails re: potential Cooley conflict of interest (.7); telephone conference and analysis re: next steps on conflict issue (.2); conference, analysis and exchange of e-mails re: preparation of document retention demand (.4); review, analysis and revision of draft letter and reviewed correspondence re: additional changes (.3).	Farrell, Michael	3.5	2,504.25	87,327.00	WO HD TR_____
09/19/19	7964450	Review status of receivership order recordings.	Kaup, John	0.2	58.50	87,385.50	WO HD TR_____
09/19/19	7962080	Discuss joint motion regarding turnover of frozen funds in Champion-Cain personal accounts with Receiver	Fates, Edward (Ted)	3.6	2,138.40	89,523.90	WO HD TR_____

Trans Date	Index	Description of Service Rendered	Timekeeper	Hours	Fees	Sum	Circle	Action
		(.2); revisions to joint motion (.2); analyze issues regarding document retention letter (.2); call with counsel for Chicago Title (.3); update Receiver regarding same (.2); work on document subpoenas to escrow companies, discuss same with Receiver (.8); meet and confer communications regarding joint motion (.4); analyze potential conflict of interest issues regarding Chicago Title counsel, discuss same with Receiver (.8); confer with SEC counsel regarding same (.3); communications with Chicago Title counsel (.2).						
09/19/19	7963369	Confer with landlord regarding self-help bar (.3); confer with CalPrivate Bank regarding extension for subpoena (.1); review new subpoena information for escrow accounts and confer with counsel regarding the same (.2).	Aspis, Norman	0.6	243.00	89,766.90	WO	HD TR_____
09/19/19	7963374	Draft letter to Chicago Title Company requesting retention and preservation of records (.5).	Aspis, Norman	0.5	202.50	89,969.40	WO	HD TR_____
09/20/19	7966988	Review of the email communications, analysis/meeting with counsel re conflicts, address legal issues/strategy (.4). Several calls with counsel and legal advice as to the discovery issues, scope of bank discovery/email communications (.3). Address AUSA grand jury subpoena and Receiver response (.9).	Zaro, David	1.6	1,260.00	91,229.40	WO	HD TR_____

Trans Date	Index	Description of Service Rendered	Timekeeper	Hours	Fees	Sum	Circle Action
09/20/19	7976610	Conference and analysis re: various ex parte issues and strategy (.2); analysis and exchange of e-mails re: CPB filing and strategy to address same in reply papers (.3); initial review and analysis of CPB papers and analysis re: legal issues raised by same (.9); conferences and analysis re: law and argument on perfection of security interests in accounts (.6); review, analysis and exchange of e-mails re: conflict issues and handling of same (.2); preparation for and participation in conference call with S. Strauss and reviewed follow up e-mail re: same (.4); initial review and analysis of ex parte opposition papers filed by Chicago Title and analysis re: response to same (1.1); finalized and forwarded document retention letter (.1).	Farrell, Michael	3.8	2,718.90	93,948.30	WO HD TR_____
09/20/19	7965459	Revise recording for San Diego County and follow-up on other recordings of receivership order.	Kaup, John	0.5	146.25	94,094.55	WO HD TR_____
09/20/19	7963512	Discuss art gallery transactions and subpoena for records regarding same with Receiver (.2); work on subpoena (.2); Analyze and advise Receiver on conflict issues regarding counsel for Chicago Title (.4); confer with SEC counsel regarding same (.2); prepare letter to consulting firm regarding large payment from receivership entities (.6); discuss same with Receiver (.1); call/emails with counsel for Chicago Title and SEC counsel	Fates, Edward (Ted)	4.1	2,435.40	96,529.95	WO HD TR_____

Trans Date	Index	Description of Service Rendered	Timekeeper	Hours	Fees	Sum	Circle Action
		(.5); call with consulting firm regarding payments received (.3); analyze CalPrivate Bank response to ex parte application (.3); analyze Chicago title opposition to ex parte application and initial work on reply to same (1.2).					
09/20/19	7964449	Analysis and determination of client documents in preparation for attorney review.	Peng, Simona	0.5	146.25	96,676.20	WO HD TR_____
09/20/19	7964293	Review correspondence from Tricorp and document production (.2).	Aspis, Norman	0.2	81.00	96,757.20	WO HD TR_____
09/20/19	7964294	Review CalPrivate Bank response to ex parte app (.2); confer with counsel regarding reply to opposition (.3); review Chicago Title's opposition to ex parte app and internal counsel's comments (.8); confer with counsel for Elite Escrow regarding subpoenas (.2).	Aspis, Norman	1.5	607.50	97,364.70	WO HD TR_____
09/21/19	7968732	Analysis/legal arguments, briefs filed by Chicago/Bank defendants as turnover, email advice as to responses (.8). Email/analysis of Receiver preliminary accounting and follow-up as to preliminary findings (.4).	Zaro, David	1.2	945.00	98,309.70	WO HD TR_____
09/21/19	7971410	Review and analysis of opposition papers filed by Chicago Title and outlined issues to be addressed in reply (3.3); drafted correspondence outlining key issues (.4); reviewed correspondence re: opposition papers and exchanged e-mails re: same (.4).	Farrell, Michael	4.1	2,933.55	101,243.25	WO HD TR_____

Trans Date	Index	Description of Service Rendered	Timekeeper	Hours	Fees	Sum	Circle Action
09/21/19	7964580	Analyze Champion-Cain response to ex parte application and advise Receiver regarding same.	Fates, Edward (Ted)	0.4	237.60	101,480.85	WO HD TR_____
09/22/19	7971415	Analysis and exchange of e-mails re: preparation of reply brief.	Farrell, Michael	0.2	143.10	101,623.95	WO HD TR_____
09/22/19	7965500	Draft portion of reply in support of ex parte application regarding Chicago Title's turnover of funds (.5).	Aspis, Norman	0.5	202.50	101,826.45	WO HD TR_____
09/23/19	7967540	Analysis of investor claimants briefing related to Chicago Title turnover of funds (.3). Advice to counsel related to briefing re Chicago Title (.3).	Zaro, David	0.6	472.50	102,298.95	WO HD TR_____
09/23/19	7969394	Call with counsel re Chicago subpoena and the response from Chicago re subpoena (.2). Advice concerning the CalPrivate Bank records subpoena (.2).	Zaro, David	0.4	315.00	102,613.95	WO HD TR_____
09/23/19	7971401	Performed numerous tasks re: preparation of reply in support of ex parte application, including various conferences, review of authorities, exchange of e-mails, and revisions to draft reply and review of pertinent documents (4.5); review and analysis of documents filed by investors and creditors (.7); conferences and analysis re: strategy to address same (.5).	Farrell, Michael	5.7	4,078.35	106,692.30	WO HD TR_____
09/23/19	7966727	Check status of recording of receivership order to affect new properties in San Diego County.	Kaup, John	0.1	29.25	106,721.55	WO HD TR_____
09/23/19	7964891	Finalize joint motion and order regarding turn over of frozen funds in	Fates, Edward (Ted)	4.7	2,791.80	109,513.35	WO HD TR_____



Trans Date	Index	Description of Service Rendered	Timekeeper	Hours	Fees	Sum	Circle	Action
		Champion-Cain personal accounts (.4); communications with SEC counsel regarding same (.2); follow up communications with counsel for Champion-Cain regarding personal property items removed from receivership properties (.1); discuss same with Receiver (.1); respond to communications with counsel for CalPrivate Bank regarding hearing on ex parte application (.2); communications with SEC counsel regarding ex parte application and hearing on same (.4); update Receiver regarding same (.2); communications with SEC counsel and counsel for Chicago Title regarding conflict issue (.3); analyze oppositions to ex parte application filed by investors (.5); revisions to reply brief regarding ex parte application (2.3).						
09/23/19	7965900	Draft reply in support of ex parte application of receiver regarding the turnover of funds from Chicago Title (7.8).	Aspis, Norman	7.8	3,159.00	112,672.35	WO	HD TR_____
09/24/19	7967738	Call with Receiver to address and provide legal advice regarding the closing of the operations, the leases, termination issues, and follow up thereon (.4). Analysis of the lease documents/termination agreement concerning issues regarding the Patio and other leases (.3). Follow up to advise as to Leases, turnover motion/oral argument/budget (.8).	Zaro, David	1.9	1,496.25	114,168.60	WO	HD TR_____

Trans Date	Index	Description of Service Rendered	Timekeeper	Hours	Fees	Sum	Circle Action
		Work on communications to landlords/lenders related to the payments and debt service (.4).					
09/24/19	7971393	Handled various matters re: reply brief in support of ex parte application, including telephone conferences, analysis, exchange of e-mails and revisions to brief (3.8); review and analysis of papers submitted by SEC and investors re: ex parte application and analysis re: effect of same on strategy (1.2); outlined arguments for hearing, including review of opposition papers and other materials (1.3).	Farrell, Michael	6.3	4,507.65	118,676.25	WO HD TR_____
09/24/19	7970265	Review information and prepare list of additional related entities; review documents and pleadings for asset recovery.	Kaup, John	2.3	672.75	119,349.00	WO HD TR_____
09/24/19	7966129	Work on reply brief regarding ex parte application (1.1); discuss same with Receiver (.4); communications with Champion-Cain counsel regarding return of items removed from receivership property (.3); advise on document subpoenas to be issued to banks, escrow companies and art gallery (.3); communications with former ANI outside counsel regarding production of documents and attorney-client privilege concerns (.4); call/emails with SEC counsel and counsel for Chicago Title regarding conflict of interest issues (.6); gather information regarding same (.5); advise Receiver regarding order on	Fates, Edward (Ted)	4.2	2,494.80	121,843.80	WO HD TR_____

Trans Date	Index	Description of Service Rendered	Timekeeper	Hours	Fees	Sum	Circle	Action
		joint motion regarding funds held in Champion-Cain personal accounts at Chase (.2); analyze further responses to ex parte application filed by SEC and investors (.4).						
09/24/19	7972549	Analysis and determination of document productions in preparation for attorney review.	Peng, Simona	0.5	146.25	121,990.05	WO	HD TR_____
09/24/19	7968444	Confer with Texas Capital Bank regarding subpoena and production (.2); upload and review certain productions in response to subpoenas (.3); confer with counsel regarding certain subpoenas (.3).	Aspis, Norman	0.8	324.00	122,314.05	WO	HD TR_____
09/24/19	8011943	Review revisions to ex parte application and confer with counsel regarding the same (.3).	Aspis, Norman	0.3	121.50	122,435.55	WO	HD TR_____
09/25/19	7970859	Travel to, preparation for and participation in hearing on ex parte application (6.8); various conferences and analysis re: likely ruling and strategy going forward (.5).	Farrell, Michael	7.3	5,223.15	127,658.70	WO	HD TR_____
09/25/19	7967219	Initial review of bank transfer documents produced by Chicago Title (.4); discuss same with Receiver (.2); attend hearing on ex parte application (1.7); discuss strategy regarding same with Receiver (.5); correspondence with payroll vendor regarding access to system and employee data (.3); analyze issues regarding ANI investment in 2Budz Holdings (.4).	Fates, Edward (Ted)	3.5	2,079.00	129,737.70	WO	HD TR_____

Trans Date	Index	Description of Service Rendered	Timekeeper	Hours	Fees	Sum	Circle Action
09/25/19	7968433	Analyze case law regarding waiver of 28 U.S.C. section 2001(b) and draft email regarding the same (.6); confer with counsel regarding subpoenas (.1).	Aspis, Norman	0.7	283.50	130,021.20	WO HD TR_____
09/26/19	7972833	Analysis of the report and recommendation, meeting with counsel/Receiver to address impact, next steps (.5).	Zaro, David	0.5	393.75	130,414.95	WO HD TR_____
09/26/19	7971384	Review and analysis of report and recommendation (.3); various conferences, analysis and exchange of e-mails re: effect of same on strategy (.5); analysis and review of materials re: potential procedural issues to address potential informal resolution with Chicago Title (.3).	Farrell, Michael	1.1	787.05	131,202.00	WO HD TR_____
09/26/19	7969214	Analyze report and recommendation regarding ex parte application and advise Receiver regarding same (.4); call/emails with counsel for 2BH regarding ANI investment in company and documents relating to same (.5); discuss potential fraudulent transfers and investigation of same with Receiver (.4).	Fates, Edward (Ted)	1.3	772.20	131,974.20	WO HD TR_____
09/26/19	7975444	Confer with counsel regarding magistrate judge's ruling regarding Chicago Title (.3); revise certain subpoenas (.3).	Aspis, Norman	0.6	243.00	132,217.20	WO HD TR_____
09/27/19	7973246	Call/email with counsel related to the subpoena/discovery concerning lenders and banks (.4).	Zaro, David	0.4	315.00	132,532.20	WO HD TR_____

Trans Date	Index	Description of Service Rendered	Timekeeper	Hours	Fees	Sum	Circle	Action
09/27/19	8011947	Outlined potential issues to be addressed in objections to report and recommendation (.3).	Farrell, Michael	0.3	214.65	132,746.85	WO HD	TR_____
09/27/19	7970129	Gather information regarding Seattle Funding Group loans, discuss same with Receiver (.4); analyze issues and strategy regarding J. Lance interests in San Rafael properties, discuss same with Receiver (.7); call/emails with Receiver and J. Lance regarding San Rafael properties (.8); communications with Receiver and former landlord for restaurant regarding termination of lease and related issues (.3).	Fates, Edward (Ted)	2.2	1,306.80	134,053.65	WO HD	TR_____
09/27/19	7975958	Confer with counsel regarding subpoenas (.3); draft subpoenas, review comments regarding the same, and transmit for service (2.6).	Aspis, Norman	2.9	1,174.50	135,228.15	WO HD	TR_____
09/30/19	7975786	Work on the discovery/documents regarding lenders, analysis of loan positions as to various projects, follow-up to assess next steps and asset protection measure (.7). Analysis of life insurance policies/preliminary review of insurance policy loan and lender claims (1.2).	Zaro, David	1.9	1,496.25	136,724.40	WO HD	TR_____
09/30/19	7976720	Conferences and analysis re: Chicago Title turnover, lender and landlord issues, and overall strategy.	Farrell, Michael	0.5	357.75	137,082.15	WO HD	TR_____
09/30/19	7973349	Analyze information and potential for recovery from life insurance policies.	Fates, Edward (Ted)	0.4	237.60	137,319.75	WO HD	TR_____

Trans Date	Index	Description of Service Rendered	Timekeeper	Hours	Fees	Sum	Circle Action
09/30/19	7973860	Serve subpoenas upon the parties in the action (.2).	Aspis, Norman	0.2	81.00	137,400.75	WO HD TR_____
10/01/19	8007700	Review and analysis of correspondence from Chicago Title re: document retention and exchanged e-mails re: same (.4); review and analysis of ex parte application and analysis re: potential effect on efforts to obtain Chicago Title funds (.4); reviewed SEC response to same (.3).	Farrell, Michael	1.1	787.05	138,187.80	WO HD TR_____
10/01/19	8007702	Review and analysis of transcript of hearing before Judge Huff (.4); analysis and exchange of e-mails re: potential effect of same on objection to report and recommendation (.3).	Farrell, Michael	0.7	500.85	138,688.65	WO HD TR_____
10/01/19	7978545	Prepare list of receivership entities.	Kaup, John	0.4	117.00	138,805.65	WO HD TR_____
10/01/19	7976770	Discuss art gallery subpoena and follow up regarding same with Receiver (.2); follow up communications with outside counsel regarding document production and pending matters (.2).	Fates, Edward (Ted)	0.4	237.60	139,043.25	WO HD TR_____
10/01/19	7977550	Draft letters regarding the appointment order and self-help bar contained therein (.8); review correspondence from landlords and respond to the same (.3).	Aspis, Norman	1.1	445.50	139,488.75	WO HD TR_____
10/02/19	7981229	Several emails with the Receiver and counsel concerning ongoing lender issues (.5).	Zaro, David	0.5	393.75	139,882.50	WO HD TR_____
10/02/19	7978043	Communications with counsel for Champion-Cain and former ANI	Fates, Edward (Ted)	0.5	297.00	140,179.50	WO HD TR_____

Trans Date	Index	Description of Service Rendered	Timekeeper	Hours	Fees	Sum	Circle	Action
		outside counsel regarding production of documents and attorney-client privilege issues (.3); advise on document subpoena to escrow company, redaction issues and production date (.2).						
10/03/19	8090253	Numerous emails regarding the outstanding subpoenas to lenders and banks, scope of request, meet/confer issues (.7). Work on issues/call with counsel re life insurance policy recovery (.6). Call related to the life insurance policy, claims and possible recovery (.7).	Zaro, David	2.0	1,575.00	141,754.50	WO	HD TR_____
10/03/19	8007599	Review and analysis of objection filed by Shuler (.5); initial review and analysis of objection filed by Chicago Title (.9); analysis and exchange of e-mails re: objections and response to same (.2).	Farrell, Michael	1.6	1,144.80	142,899.30	WO	HD TR_____
10/03/19	7978880	Call with SEC counsel regarding appraisal information relating to receivership properties (.2); advise Receiver regarding same (.1); analyze issues raised in Shuler, Chicago Title and Aguirre/Edelman objections to report and recommendation (.6); discuss same and reply brief with Receiver (.3).	Fates, Edward (Ted)	1.2	712.80	143,612.10	WO	HD TR_____
10/03/19	7983559	Confer with counsel regarding issues in connection with CalPrivate Bank subpoena (.3); review productions in response to certain subpoenas and transmit the same and confer with recipients of subpoenas regarding	Aspis, Norman	1.4	567.00	144,179.10	WO	HD TR_____

Trans Date	Index	Description of Service Rendered	Timekeeper	Hours	Fees	Sum	Circle Action
		various production issues (1.1).					
10/04/19	7979913	Initial analysis of investments and loans made by receivership entities, documentation of same (.6); analyze issues regarding deed of trust recorded on receivership properties in favor of investor (.4); calls with Receiver and counsel for Champion-Cain regarding same (.5).	Fates, Edward (Ted)	1.5	891.00	145,070.10	WO HD TR_____
10/04/19	7983539	Teleconference regarding subpoena to jeweler (.3).	Aspis, Norman	0.3	121.50	145,191.60	WO HD TR_____
10/06/19	8007590	Further review and analysis of objection papers and pertinent authority, and outlined issues to be addressed in response (2.9); analysis and exchange of e-mails re: response issues and timing (.2).	Farrell, Michael	3.6	2,575.80	147,767.40	WO HD TR_____
10/06/19	7980474	Analyze issues regarding investment in Tourmaline Equity.	Fates, Edward (Ted)	0.2	118.80	147,886.20	WO HD TR_____
10/07/19	7982984	Call/emails re Bank Direct Premium loan/follow-up (.4).	Zaro, David	0.4	315.00	148,201.20	WO HD TR_____
10/07/19	8007587	Review and analysis of correspondence from M. Donohue re: proposed stipulation for hearing on objection to report and recommendation (.2); analysis and exchange of e-mails re: response to same (.4); drafted response to counsel (.2); review, analysis and exchange of e-mails re: turnover of different escrow funds to Receiver (.3); began drafting response to objection (2.6).	Farrell, Michael	3.7	2,647.35	150,848.55	WO HD TR_____



Trans Date	Index	Description of Service Rendered	Timekeeper	Hours	Fees	Sum	Circle Action
10/07/19	7981394	Analyze and advise on issues regarding objections to report and recommendation granting ex parte application and response to same (.7); analyze issues regarding potential recovery from life insurance policy (.4); discuss turn over of funds by Chicago Title with Receiver (.2).	Fates, Edward (Ted)	1.3	772.20	151,620.75	WO HD TR_____
10/07/19	8090263	Attention to subpoena-related issues (.4). review Chicago Title response to magistrate judge's recommendation (.3); confer with counsel regarding the same (.1).	Aspis, Norman	0.8	324.00	151,944.75	WO HD TR_____
10/08/19	8006899	Continued draft response to objection, including review of documents, Magistrate report and applicable authority.	Farrell, Michael	3.2	2,289.60	154,234.35	WO HD TR_____
10/08/19	7982017	Communications with ANI outside corporate counsel.	Fates, Edward (Ted)	0.3	178.20	154,412.55	WO HD TR_____
10/09/19	8006680	Completed initial draft of response to objection, including review of pertinent documents and case law (4.1); review, analysis and revision of draft brief (1.1); review, analysis and exchange of various e-mails re: issues and strategy for response (.3).	Farrell, Michael	5.5	3,935.25	158,347.80	WO HD TR_____
10/09/19	7983589	Communications with ANI outside corporate counsel regarding information on surety bond (.3); communications with counsel for Champion-Cain regarding issues relating to Riharb deed of trust (.2); analyze information from ANI in-house counsel regarding Windemere	Fates, Edward (Ted)	2.7	1,603.80	159,951.60	WO HD TR_____

Trans Date	Index	Description of Service Rendered	Timekeeper	Hours	Fees	Sum	Circle Action
		Ct. boundary line dispute (.2); follow up communications with counsel for Chicago title regarding turnover of balance in small account (.1); initial work on letters to companies/borrowers with ANI investments/loans (.3); work on reply to objections to report and recommendation (1.3); advise on jeweler's response to document subpoena and next steps (.1); advise G. Rodriguez on issues relating to former employee lease of ANI residential property (.2).					
10/10/19	8006612	Telephone conference and analysis re: response to objection and potential hearing on same.	Farrell, Michael	0.4	286.20	160,237.80	WO HD TR_____
10/10/19	7985684	Discuss revisions to reply to objections to report and recommendation with Receiver (.6); work on same (1.7); advise Receiver on issues relating to Cultivate assets (.4); Call with ANI in-house counsel and insurance broker regarding ANI insurance claims and coverage issues (.4); call with Champion-Cain, counsel for Champion-Cain, and Receiver regarding note/deed of trust in favor of C. Riharb (.5); initial work on demand letters to Surf Rider MB contractor and tenant J. Hanson (.6); call with counsel for CalPrivate Bank regarding information on potential company assets and money transfers (.4); analyze correspondence from counsel for Chicago Title and issues	Fates, Edward (Ted)	5.8	3,445.20	163,683.00	WO HD TR_____

Trans Date	Index	Description of Service Rendered	Timekeeper	Hours	Fees	Sum	Circle	Action
		relating to escrow account with 301 D Street contractor (.5); discuss same with Receiver (.2); analyze and advise Receiver on issues with C. Salas lease (.2); analyze investor response to objections to report and recommendation (.2); update Receiver regarding same (.1).						
10/10/19	8012150	Draft turnover letters (.5).	Aspis, Norman	0.5	202.50	163,885.50	WO	HD TR_____
10/11/19	8006583	Review and analysis of Ovation's response to objection.	Farrell, Michael	0.4	286.20	164,171.70	WO	HD TR_____
10/11/19	7987321	Revisions to letter to contractor regarding reimbursement for losses to Surf Rider restaurant (.3); advise on strategy/next steps regarding subpoena to jeweler and document production (.1); analyze documents regarding company loans to Champion-Cain family members and advise Receiver regarding initial strategy for same (.4).	Fates, Edward (Ted)	0.8	475.20	164,646.90	WO	HD TR_____
10/11/19	8009388	Revise and transmit letter to D. Wilkinson (.3); review and transmit subpoena production (.2).	Aspis, Norman	0.5	202.50	164,849.40	WO	HD TR_____
10/14/19	7988466	Analyze issues with C. Riharb note and deed of trust, discuss same with Receiver (.8); communications with C. Riharb (.2); analyze information regarding transfers to or for benefit of Champion-Cain immediate family members (.4); communications with counsel for Champion-Cain regarding same (.4); follow up communications with ANI outside corporate counsel	Fates, Edward (Ted)	4.4	2,613.60	167,463.00	WO	HD TR_____

Trans Date	Index	Description of Service Rendered	Timekeeper	Hours	Fees	Sum	Circle Action
		regarding document production (.2); analyze information relating to note receivable from P. Boermeester, discuss same with Receiver (.4); communications with ANI outside litigation counsel regarding same (.3); address issues with payments to jeweler and investigation of same (.2); work on letters to law firm, investor and borrowers on promissory notes (.6); call with ANI outside litigation counsel regarding background on P. Boermeester loan (.3); communications with ANI outside counsel regarding Dash Wagon note (.2); communications with counsel for investor connected to ANI oil investment (.2); communications with attorney for P. Boermeester estate (.2).					
10/14/19	8009136	Prepare for and participate in teleconference regarding R&R Construction (.4); case administration in connection with subpoenas and turnover letters (.4).	Aspis, Norman	0.8	324.00	167,787.00	WO HD TR_____
10/15/19	8006503	Conference, analysis and review of authority re: ability to advance hearing date, if any, on report and recommendation.	Farrell, Michael	0.5	357.75	168,144.75	WO HD TR_____
10/15/19	7989954	Work on letter to J. Hanson regarding lease for Bella Pacific property (.8); advise on letters to companies in which ANI invested or to which ANI made loans (.7); communications with counsel for P. Boermeester estate (.2); initial work on letter/subpoena to	Fates, Edward (Ted)	3.2	1,900.80	170,045.55	WO HD TR_____

Trans Date	Index	Description of Service Rendered	Timekeeper	Hours	Fees	Sum	Circle Action
		surety company relating to surety bond and document production (.4); advise Receiver on issues regarding Swell trademark dispute and settlement of same, communications with ANI outside trademark counsel (.4); conference call with Receiver, T. Dobron and counsel for T. Dobron regarding investment in Trek Partners (.6); analyze and advise on payments to JB Resources (.1).					
10/15/19	8090274	Finalize and transmit letter regarding Bella Pacific condominium (.2). attention to subpoena issues and confer with Western Alliance Bank's representative regarding the same (.3); attention to lease termination letters (.2).	Aspis, Norman	0.7	283.50	170,329.05	WO HD TR_____
10/16/19	7992648	Meeting with counsel to address the Receiver case strategy, Receiver's lender and lease issues (.9). Emails related to William Adams/discovery (.3).	Zaro, David	1.2	945.00	171,274.05	WO HD TR_____
10/16/19	7992760	Review and forward inquiry by Jonathan Segal for receivership properties; review and respond to emails.	Kaup, John	0.2	58.50	171,332.55	WO HD TR_____
10/16/19	7990824	Advise Receiver on strategy concerning lease with J. Hanson and letter to same (.3); communications with counsel for J. Hanson regarding same (.1); advise Receiver on next steps regarding analysis of interest in Trek Partners (.2); communications with counsel for T. Dobron (.1); follow	Fates, Edward (Ted)	2.2	1,306.80	172,639.35	WO HD TR_____

Trans Date	Index	Description of Service Rendered	Timekeeper	Hours	Fees	Sum	Circle Action
		up communications to C. Riharb (.1); work on letter to same (.4); analyze documents and communications relating to attorney William Adams (.6); communications with counsel for P. Boormeester estate (.2); work on letters relating to ANI investments and loans (.2).					
10/16/19	7991866	Confer with Chase representative, Receiver, and counsel regarding subpoena (.4).	Aspis, Norman	0.4	162.00	172,801.35	WO HD TR_____
10/16/19	7991918	Confer with counsel regarding letters and subpoenas (.3); draft letters and transmit the same (.2).	Aspis, Norman	0.5	202.50	173,003.85	WO HD TR_____
10/17/19	7994791	Investigation and analysis of ABC licensing/Attorney Adams and follow-up thereon (.4); Email to counsel related to subpoena related to law firms (.2); Conferences with counsel related to production of records and follow-up thereon (.6).	Zaro, David	1.2	945.00	173,948.85	WO HD TR_____
10/17/19	7992340	Communications with counsel for Champion-Cain regarding loans and transfers to parents (.4); advise on issues relating to SFG loans (.2); prepare letter to D. Champion relating to loan and purchase of BMW automobile (.6).	Fates, Edward (Ted)	1.2	712.80	174,661.65	WO HD TR_____
10/17/19	8090277	Confer with Western Alliance Bank representative regarding subpoena (.3). attention to letters in connection with the Bella pacific condominium lease and 928 Fort Stockton (.9).	Aspis, Norman	1.2	486.00	175,147.65	WO HD TR_____

Trans Date	Index	Description of Service Rendered	Timekeeper	Hours	Fees	Sum	Circle Action
10/18/19	7994827	Work with Receiver on the issues related to recovery of funds related to insurance policies, general asset sale strategy and follow-up thereon (.6).	Zaro, David	0.6	472.50	175,620.15	WO HD TR_____
10/18/19	7993205	Work on letters and document subpoenas to BayMedica, Buchanan law firm and Misiriloglu (.8); discuss issues relating to Trek Partners investment with Receiver, analyze terms of note regarding same (.4); communications with Receiver and counsel for Trek Partners (.3).	Fates, Edward (Ted)	1.5	891.00	176,511.15	WO HD TR_____
10/18/19	7994448	Draft turnover demand letters (1.3); review comments regarding the same (.2).	Aspis, Norman	1.5	607.50	177,118.65	WO HD TR_____
10/21/19	7995414	Advise Receiver on issues relating to recovery of finder's fee paid by ANI.	Fates, Edward (Ted)	0.2	118.80	177,237.45	WO HD TR_____
10/21/19	7995941	Prepare various letters and subpoenas to turnover demand targets and contract termination recipients (1.7); review correspondence from recipients of letters (.2).	Aspis, Norman	1.9	769.50	178,006.95	WO HD TR_____
10/22/19	7998603	Emails/assess lender correspondence related to the First Choice and SFG loans (.4). Conference call with Receiver and counsel related to the receivership legal issues related to operating entities, funding and recoveries (.5).	Zaro, David	0.9	708.75	178,715.70	WO HD TR_____
10/22/19	7995922	Finalize letters and subpoenas for production of documents (.4); respond to inquiries from counsel for	Fates, Edward (Ted)	1.8	1,069.20	179,784.90	WO HD TR_____

Trans Date	Index	Description of Service Rendered	Timekeeper	Hours	Fees	Sum	Circle	Action
		BayMedica (.3); call with ANI outside counsel regarding payment to JB resources (.3); discuss same with Receiver (.3); work on letter to D. Champion regarding mortgage and automobile purchase (.3); discuss issues relating to SFG loans with Receiver (.2).						
10/22/19	8001167	Draft letter and subpoenas to William A. Adams and Norton Moore Adams (1.1); review and transmit certain letters (.5).	Aspis, Norman	1.6	648.00	180,432.90	WO HD	TR_____
10/23/19	8000005	Call with life insurance counsel for Champion-Cain policy, address cash value, stay and related issues (.4).	Zaro, David	0.4	315.00	180,747.90	WO HD	TR_____
10/23/19	7997701	Discuss issues/strategy regarding C. Riharb with Receiver (.2); communications with C. Riharb regarding same (.1); call with Receiver and counsel for Trek Partners regarding Texas litigation and prospects regarding same (.8); analyze documents produced by surety company (.3).	Fates, Edward (Ted)	1.4	831.60	181,579.50	WO HD	TR_____
10/23/19	7998288	Revise subpoena tracking chart (.3); upload productions from subpoena recipients , confer with certain subpoena recipients, and transmit the same (.6).	Aspis, Norman	0.9	364.50	181,944.00	WO HD	TR_____
10/24/19	8001559	Analysis of the Receiver accounting (.3). Work with lender re inventory issues, including CDC/emails (.4). Follow-up on William Adams as to liquor license matters and subpoena,	Zaro, David	1.5	1,181.25	183,125.25	WO HD	TR_____



Trans Date	Index	Description of Service Rendered	Timekeeper	Hours	Fees	Sum	Circle Action
		including call with Williams, emails/call with Williams' counsel re records/turnover (.8).					
10/24/19	7998816	Advise on follow up and next steps regarding document subpoenas (.2); work on letter to JB Resources regarding recovery of payments (.4); revise and finalize letter and subpoena to D. Champion (.4); initial work on letter and subpoena to Mortgage Office company regarding production of electronic data (.3); communications with Alpha Surety regarding document production (.2); communications with BayMedica regarding convertible note (.2); discuss Chicago Title document production and concerns regarding same with Receiver (.3); advise on supplemental subpoena for documents (.2).	Fates, Edward (Ted)	2.2	1,306.80	184,432.05	WO HD TR_____
10/24/19	8000007	Draft cease-and-desist letter, subpoenas, and document retention letter (2.8); and attention to subpoena issues (.6).	Aspis, Norman	3.4	1,377.00	185,809.05	WO HD TR_____
10/25/19	8001582	Emails/follow-up analysis of Fireside, Goldfinch landlord and lender issues, email to Receiver (.8). Call with Receiver concerning the negotiations with landlords and third parties as to FF&E and leaseholds (.3).	Zaro, David	1.1	866.25	186,675.30	WO HD TR_____
10/25/19	8012152	Review, analysis and exchange of e-mails re: new subpoena to Chicago Title (.3).	Farrell, Michael	0.3	214.65	186,889.95	WO HD TR_____

Trans Date	Index	Description of Service Rendered	Timekeeper	Hours	Fees	Sum	Circle Action
10/25/19	8000255	Advise on issues regarding Elite Escrow document production (.2); communications with L. Ryan regarding CD at City National Bank (.2); work on letter regarding same (.3); communications with counsel for Mortgage Office regarding document production and access to software account, discuss same with G. Rodriguez (.9).	Fates, Edward (Ted)	1.6	950.40	187,840.35	WO HD TR_____
10/25/19	8001134	Teleconference with The Mortgage Office regarding turnover of cloud database; confer with counsel regarding the same (1.4).	Aspis, Norman	1.4	567.00	188,407.35	WO HD TR_____
10/25/19	8001135	Draft letter to City National Bank regarding turnover of funds in certain certificate of deposit (.6); confer with representative at City National regarding turnover of funds (.3); review correspondence from subpoena recipients and confer with counsel regarding the same (.3).	Aspis, Norman	1.2	486.00	188,893.35	WO HD TR_____
10/25/19	8001151	Attention to case administration issues in connection with subpoenas and turnover/cease-and-desist letters (.4).	Aspis, Norman	0.4	162.00	189,055.35	WO HD TR_____
10/28/19	8003068	Analysis of the corporate surety bonds, follow-up call with counsel re collection (.4).	Zaro, David	0.4	315.00	189,370.35	WO HD TR_____
10/28/19	8003347	Review and analysis of correspondence from S. Strauss and various conferences and analysis re: response to same (.4); began drafting response e-mail (.4).	Farrell, Michael	0.8	572.40	189,942.75	WO HD TR_____

Trans Date	Index	Description of Service Rendered	Timekeeper	Hours	Fees	Sum	Circle Action
10/28/19	8001132	Revisions to letter to City National Bank regarding recovery of certificate of deposit balance (.3); advise Receiver on issues relating to Cultivate product and responses to former employee and manufacturer regarding same (.5); analyze issues and strategy regarding potential claims against Chicago Title (.3); analyze issues regarding CA finance lender bonds and potential recovery (.7); address issues regarding data from Mortgage Office and Merit Financial (.3).	Fates, Edward (Ted)	2.1	1,247.40	191,190.15	WO HD TR_____
10/28/19	8012154	Attention to issues in connection with The Mortgage Office (.6); confer with counsel regarding 2855 Perry Road (.5); review and transmit letter to City National Bank (.3).	Aspis, Norman	1.4	567.00	191,757.15	WO HD TR_____
10/29/19	8004261	Call re subpoenas to lenders and advice to Receiver counsel (.5). Work on/revise draft of Receiver's response to Edelman intervention motion (.1.4).	Zaro, David	1.9	1,496.25	193,253.40	WO HD TR_____
10/29/19	8003306	Conference and analysis re: Chicago Title correspondence, claim investigation and investor actions (.4); completed drafting response to S. Strauss correspondence and exchanged e-mails re: same (.4); review and analysis of draft subpoena and exchanged e-mails re: same (.4); reviewed oppositions to intervention motion (.3).	Farrell, Michael	1.5	1,073.25	194,326.65	WO HD TR_____
10/29/19	8002413	Advise on next steps regarding document productions and	Fates, Edward (Ted)	1.8	1,069.20	195,395.85	WO HD TR_____

Trans Date	Index	Description of Service Rendered	Timekeeper	Hours	Fees	Sum	Circle	Action
		compliance with subpoenas (.4); analyze issues regarding CA finance lender bonds and potential recovery, communications with surety broker regarding same (.5); advise Receiver regarding same (.2); advise Receiver on next steps regarding Merit Financial (.4); advise Receiver on strategy regarding Cultivate product (.2); update Receiver regarding issues with C. Rihanna (.1).						
10/29/19	8090280	Confer with counsel regarding case administration issues (.4); confer with H. Cohn regarding, and attention to, issues in connection with The Mortgage Office (.5). draft supplemental subpoena to Chicago Title and corresponding documents (.5); confer with CalPrivate Bank regarding subpoena (.2).	Aspis, Norman	1.6	648.00	196,043.85	WO	HD TR_____
10/30/19	8006868	Analysis of issues related to accounting, discovery and revise subpoena and document request (.7). Work/analysis of SEC filings related to third party intervention, follow-up with Receiver and counsel (.7).	Zaro, David	1.4	1,102.50	197,146.35	WO	HD TR_____
10/30/19	8003572	Advise Receiver on next steps regarding document productions, subpoenas and bank records necessary for forensic accounting (.7); analyze issues relating to SFG loans and advise Receiver regarding same (.4).	Fates, Edward (Ted)	1.1	653.40	197,799.75	WO	HD TR_____
10/30/19	8006474	Attention to case administration issues in connection with subpoenas	Aspis, Norman	0.5	202.50	198,002.25	WO	HD TR_____

Trans Date	Index	Description of Service Rendered	Timekeeper	Hours	Fees	Sum	Circle	Action
		and the database administered by The Mortgage Office (.5).						
10/31/19	8009213	Analysis of dispute related to subpoena, meet/confer related to CalPrivate Bank and legal advice (.6). Revise the draft of third party lender subpoena (.5). Work on the issues related to document review/discovery and document demands, meeting with counsel to advise as to strategy (.5).	Zaro, David	1.6	1,260.00	199,262.25	WO	HD TR_____
10/31/19	8007783	Analysis and exchange of e-mails re: new subpoena to Chicago Title (.2); review, analysis and exchange of e-mails with Receiver re: response to Chicago request for informal discovery (.5); conferences and analysis re: potential revision to response and exchanged numerous e-mails re: same (.3); drafted e-mail to SEC re: exchange with Chicago Title (.2).	Farrell, Michael	1.0	715.50	199,977.75	WO	HD TR_____
10/31/19	8005312	Work on supplemental subpoena to Chicago Title, communications with Receiver regarding same.	Fates, Edward (Ted)	0.7	415.80	200,393.55	WO	HD TR_____
10/31/19	8007703	Revise subpoena to Chicago Title Company (.5); Prepare for and participate in telephonic meet-and-confer with CalPrivate Bank (.8).	Aspis, Norman	1.3	526.50	200,920.05	WO	HD TR_____
11/01/19	8012084	Review/evaluate the First Choice and AXOS loan agreements, analysis of legal issues; brief research/analysis of the issues related to release prices, the pre-payment penalty and fees	Zaro, David	2.6	2,047.50	202,967.55	WO	HD TR_____

Trans Date	Index	Description of Service Rendered	Timekeeper	Hours	Fees	Sum	Circle Action
		(1.7). Follow-up meeting with Receiver and Mr. Rodriguez, and counsel re loan defaults/recovery strategy (.9).					
11/01/19	8010525	Analyze issues and advise Receiver on strategy related to 4014 Bandini property (.7); discuss same with Receiver (.2); communications with counsel for SEC regarding same (.1); discuss issues relating to SFG loans with Receiver (.3); communications with L. Ryan regarding CD at City National Bank (.2); communications with C. Riharb (.2).	Fates, Edward (Ted)	1.7	1,009.80	203,977.35	WO HD TR_____
11/01/19	8010159	Review and transmit lease termination letter (.3); confer with counsel regarding issues in connection with CalPrivate Bank subpoena and 2855 Perry Rd. (.3).	Aspis, Norman	0.6	243.00	204,220.35	WO HD TR_____
11/01/19	8010163	Confer with City National Bank representative regarding certificate of deposit (.2).	Aspis, Norman	0.2	81.00	204,301.35	WO HD TR_____
11/02/19	8010156	Revise subpoena to Wells Fargo (.4); draft subpoena to Bank of America (.2); attention to case administration in connection with subpoenas (.2).	Aspis, Norman	0.8	324.00	204,625.35	WO HD TR_____
11/03/19	8010213	Draft subpoenas to various financial institutions and revise subpoena chart (2.2); review and transmit production from Western Alliance Bank (.3); attention to issues in connection with certificate of deposit at City National Bank (.3); draft letters regarding certain promissory notes	Aspis, Norman	3.3	1,336.50	205,961.85	WO HD TR_____

Trans Date	Index	Description of Service Rendered	Timekeeper	Hours	Fees	Sum	Circle	Action
		pursuant to which ANI lent money (.5).						
11/04/19	8012464	Research issues related to SFG loans/lending issues and related documents (.6). Revise draft subpoenas and advice to counsel (.4). email related to the Bandini loans/property transfers and ownership (.4).	Zaro, David	1.4	1,102.50	207,064.35	WO	HD TR_____
11/04/19	8012466	Analysis of issues related to First choice, the turnover of property, monetizing collateral, follow-up as to Fireside and revise letter (1.4). Call with the Receiver related asset recovery (.4).	Zaro, David	1.8	1,417.50	208,481.85	WO	HD TR_____
11/04/19	8010593	Revisions to documents subpoenas to banks and letters to recipients of loans/investments from ANI (.4); call with Receiver and counsel for SEC regarding Bandini property, First Choice loan, and related issues (.4); analyze case law regarding same and advise Receiver (.3); address issues regarding W. Adams document production (.1).	Fates, Edward (Ted)	1.2	712.80	209,194.65	WO	HD TR_____
11/04/19	8020071	Analysis and determination of document productions in preparation for attorney review.	Peng, Simona	2.2	643.50	209,838.15	WO	HD TR_____
11/04/19	8011423	Confer with counsel regarding subpoena to Seattle Funding Group and revise the same (.4); confer with counsel regarding 2855 Perry Rd. and revise letter regarding the same (.3); confer with counsel regarding	Aspis, Norman	1.8	729.00	210,567.15	WO	HD TR_____

Trans Date	Index	Description of Service Rendered	Timekeeper	Hours	Fees	Sum	Circle	Action
		various letter and subpoenas (.2); review and finalize the same for transmission (.4); attention to case administration issues in connection with subpoenas (.5).						
11/05/19	8012566	Calls with SEC counsel and SBA counsel relating to SBA loans and Bandini property.	Fates, Edward (Ted)	0.5	297.00	210,864.15	WO HD	TR_____
11/05/19	8020124	Analysis and determination of document productions in preparation for attorney review.	Peng, Simona	0.8	234.00	211,098.15	WO HD	TR_____
11/05/19	8040336	Attention to case administration issues in connection with subpoenas (.3).	Aspis, Norman	0.3	121.50	211,219.65	WO HD	TR_____
11/06/19	8013578	Analyze D. Champion response regarding mortgage and BMW automobile (.3); prepare response to same and discuss with Receiver (.5); initial review of documents produced by J. Hanson (.3).	Fates, Edward (Ted)	1.1	653.40	211,873.05	WO HD	TR_____
11/06/19	8020160	Analysis and determination of document productions in preparation for attorney review.	Peng, Simona	0.7	204.75	212,077.80	WO HD	TR_____
11/06/19	8014600	Review and sign letter to Irvine Management Company (.2); confer with counsel for Seattle Funding Group of California, LLC and counsel for landlord (.3).	Aspis, Norman	0.5	202.50	212,280.30	WO HD	TR_____
11/07/19	8016605	Work on issues and respond to emails related to ANI Receiver subpoenas to banks, including BankDirect, the Adams Firm, advice to counsel as to coordination	Zaro, David	0.9	708.75	212,989.05	WO HD	TR_____



Trans Date	Index	Description of Service Rendered	Timekeeper	Hours	Fees	Sum	Circle	Action
		document review (.9).						
11/08/19	8016438	Advise regarding analysis of document production by Attorney W. Adams (.4); call with C. Riharb and counsel regarding investments and note/deed of trust on receivership properties (.7); work on subpoena to be issued to C. Riharb (.3); finalize supplemental document subpoena to Chicago Title, discuss same with Receiver (.4).	Fates, Edward (Ted)	1.8	1,069.20	214,058.25	WO HD	TR_____
11/08/19	8017080	Confer with counsel regarding subpoena to Chicago Title and Seattle Funding Group (.2); correspond with counsel for Chicago Title regarding subpoena (.1).	Aspis, Norman	0.3	121.50	214,179.75	WO HD	TR_____
11/09/19	8020060	Conduct discovery review regarding William Adams production.	Williams, Rebecca	1.0	301.50	214,481.25	WO HD	TR_____
11/11/19	8023983	Call/email related to the BankDirect premium financing/subpoena (.4). Assess letter and BankDirect response to subpoena, analysis of the life insurance policy issues, call with counsel related to policies (.8).	Zaro, David	1.2	945.00	215,426.25	WO HD	TR_____
11/11/19	8020121	Discuss document subpoena to Nations Direct with Receiver (.2); work on same (.2); advise on issues relating to life insurance policies (.3).	Fates, Edward (Ted)	0.7	415.80	215,842.05	WO HD	TR_____
11/11/19	8020155	Conduct discovery review regarding William Adams production.	Williams, Rebecca	0.5	150.75	215,992.80	WO HD	TR_____
11/11/19	8040322	Prepare letter in connection with Receivership Entity investments (.3).	Aspis, Norman	0.3	121.50	216,114.30	WO HD	TR_____

Trans Date	Index	Description of Service Rendered	Timekeeper	Hours	Fees	Sum	Circle Action
11/12/19	8024001	Research/analysis of the life insurance policies, the secured loan from BankDirect, collateral assignment and assess rights of Receiver (.9) Call related to discovery request to lender and advice re same (.2).	Zaro, David	1.1	866.25	216,980.55	WO HD TR_____
11/12/19	8020800	Revise and finalize document subpoena to C. Riharb (.3); communications with counsel for C. Riharb regarding same (.2); finalize correspondence to D. Champion regarding mortgage and gift from ANI (.2); advise on contents for letters to ANI investments (.2); analyze and advise Receiver on issues relating to insurance claims (.4).	Fates, Edward (Ted)	1.3	772.20	217,752.75	WO HD TR_____
11/12/19	8021679	Analysis and determination of document productions in preparation for attorney review.	Peng, Simona	0.3	87.75	217,840.50	WO HD TR_____
11/13/19	8022683	Analysis and determination of document productions in preparation for attorney review.	Peng, Simona	0.4	117.00	217,957.50	WO HD TR_____
11/13/19	8040258	Prepare and transmit document preservation letter to Seattle Funding Group (.4).	Aspis, Norman	0.4	162.00	218,119.50	WO HD TR_____
11/14/19	8027881	Call with counsel regarding Merit Financial and California Opportunity License Fund intervention motion (.2) Revise draft opposition to Merit intervention motion (.6). Work on revisions to letter/email concerning documents, call with SFG counsel re production of records (.7). Advice as	Zaro, David	1.1	866.25	218,985.75	WO HD TR_____

Trans Date	Index	Description of Service Rendered	Timekeeper	Hours	Fees	Sum	Circle	Action
		to the SFG subpoenas to the Receiver and counsel (.4).						
11/14/19	8023599	Call with insurance broker regarding issues relating to crime loss policy (.4); advise Receiver regarding same (.2); communications with ANI in house counsel regarding same (.1).	Fates, Edward (Ted)	0.7	415.80	219,401.55	WO	HD TR_____
11/14/19	8040208	Confer with counsel regarding subpoena issues in connection with Seattle Funding Group and review relevant materials regarding the same (.5).	Aspis, Norman	0.5	202.50	219,604.05	WO	HD TR_____
11/15/19	8024726	Advise on issues relating to William Adams document production and analysis of same.	Fates, Edward (Ted)	0.2	118.80	219,722.85	WO	HD TR_____
11/18/19	8090391	Research/analysis of proposed protective order related to the bank subpoenas, follow-up meeting with counsel and advice as to production (.8). Emails related to monetizing the Receiver liquor license for Fireside, follow-up to address transfer (.4).	Zaro, David	1.2	945.00	220,667.85	WO	HD TR_____
11/18/19	8027168	Communications with Receiver and counsel for Chicago Title regarding wire transfer of funds (.4); discuss same with Receiver (.1); revisions to document subpoenas for various bank account records (.4); analyze issues regarding Chicago Title escrow account related to Keller Street sale, discuss same with G. Rodriguez (.2).	Fates, Edward (Ted)	1.1	653.40	221,321.25	WO	HD TR_____
11/18/19	8039826	Draft supplemental subpoenas and	Aspis, Norman	0.7	283.50	221,604.75	WO	HD TR_____

Trans Date	Index	Description of Service Rendered	Timekeeper	Hours	Fees	Sum	Circle Action
		letter to financial institutions (.7).					
11/19/19	8027612	Revisions to letters to BayMedica and 2Budz Holdings (.9); communications with Receiver and counsel for Chicago Title regarding wire transfer (.2).	Fates, Edward (Ted)	1.1	653.40	222,258.15	WO HD TR_____
11/19/19	8039520	Analysis and determination of document productions in preparation for attorney review.	Peng, Simona	0.5	146.25	222,404.40	WO HD TR_____
11/19/19	8039662	Draft letters regarding Receivership Entity investments (.8).	Aspis, Norman	0.8	324.00	222,728.40	WO HD TR_____
11/19/19	8039748	Confer with S. Peng regarding third-party production (.2).	Aspis, Norman	0.2	81.00	222,809.40	WO HD TR_____
11/20/19	8029549	Communications with counsel for former ANI counsel regarding conflict questions related to document production and resolution of same (.3); advise Receiver regarding same (.1).	Fates, Edward (Ted)	0.4	237.60	223,047.00	WO HD TR_____
11/20/19	8038751	Teleconference with H. Krasner regarding subpoena; review notes regarding the same (.3); draft supplemental subpoenas to financial institutions (.8).	Aspis, Norman	1.1	445.50	223,492.50	WO HD TR_____
11/20/19	8038814	Draft letters in connection with Receivership Entity investments (1.2); confer with Well Fargo regarding subpoena issues (.3); confer with counsel regarding the Fireside By The Patio space (.2).	Aspis, Norman	1.7	688.50	224,181.00	WO HD TR_____
11/21/19	8030439	Communications with in-house counsel regarding issues relating to	Fates, Edward (Ted)	0.7	415.80	224,596.80	WO HD TR_____

Trans Date	Index	Description of Service Rendered	Timekeeper	Hours	Fees	Sum	Circle Action
		insurance claims (.3); revisions to letters to companies ANI invested in or loaned money to (.4).					
11/22/19	8031631	Revisions to additional letters to companies ANI invested in or loaned funds to (.3); analyze order on ex parte application regarding funds turned over by Chicago Title and advise Receiver regarding same (.2).	Fates, Edward (Ted)	0.5	297.00	224,893.80	WO HD TR_____
11/22/19	8035208	Review and analyze William Adams' documents.	Williams, Rebecca	3.5	1,055.25	225,949.05	WO HD TR_____
11/22/19	8038068	Draft letters to third-party recipients regarding certain investments (1.2); serve subpoenas on the parties (.3).	Aspis, Norman	1.5	607.50	226,556.55	WO HD TR_____
11/25/19	8033166	Communications with counsel for Chicago Title regarding extension of time to respond to subpoena for documents (.2); analyze issues raised in correspondence from D. Champion (.2).	Fates, Edward (Ted)	0.4	237.60	226,794.15	WO HD TR_____
11/25/19	8033803	Draft analysis regarding William Adams' involvement in ANI lending scheme.	Williams, Rebecca	6.0	1,809.00	228,603.15	WO HD TR_____
11/25/19	8038027	Draft letter to Wonderlust, LLC (.3).	Aspis, Norman	0.3	121.50	228,724.65	WO HD TR_____
11/25/19	8038043	Confer City National Bank representative regarding subpoena issues (.3).	Aspis, Norman	0.3	121.50	228,846.15	WO HD TR_____
11/26/19	8039477	Call/email with counsel related to the eviction of tenants/process and advice (.3). Meeting to address sale of FF&E and the Fireside FF&E, and call re preservation/assets of	Zaro, David	0.7	551.25	229,397.40	WO HD TR_____

Trans Date	Index	Description of Service Rendered	Timekeeper	Hours	Fees	Sum	Circle Action
		receivership (.4).					
11/26/19	8034541	Analyze summary of documents produced by attorney W. Adams (.7); communications with ANI outside counsel regarding trademarks issues (.2).	Fates, Edward (Ted)	0.9	534.60	229,932.00	WO HD TR_____
11/27/19	8039664	Review/analysis of the records from William Adams, follow-up review of legal memo (.8). Call with counsel as to Adams and strategy (.3).	Zaro, David	1.1	866.25	230,798.25	WO HD TR_____
11/27/19	8035540	Revisions to letters to companies in which ANI invested (.1); communications with D. Champion regarding issues relating to loan and gift (.3); discuss analysis of William Adams documents with Receiver (.2).	Fates, Edward (Ted)	0.6	356.40	231,154.65	WO HD TR_____
11/27/19	8039576	Revise memorandum of analysis regarding William Adams' involvement in ANI lending scheme.	Williams, Rebecca	2.0	603.00	231,757.65	WO HD TR_____
11/27/19	8037001	Review relevant documents regarding underlying investment and draft letter to BSV Group LLC and Yes Whey LLC (.5).	Aspis, Norman	0.5	202.50	231,960.15	WO HD TR_____
12/02/19	8043829	Analysis of further records concerning and addressing the W. Adams issues, potential claims, further research, call with Receiver and counsel re same (.6).	Zaro, David	0.6	472.50	232,432.65	WO HD TR_____
12/02/19	8040436	Analyze additional information from Receiver regarding W. Adams (.3); address issues regarding document subpoena to Western Alliance Bank (.2).	Fates, Edward (Ted)	0.5	297.00	232,729.65	WO HD TR_____

Trans Date	Index	Description of Service Rendered	Timekeeper	Hours	Fees	Sum	Circle Action
12/03/19	8042102	Analyze additional information from Receiver regarding attorney W. Adams.	Fates, Edward (Ted)	0.3	178.20	232,907.85	WO HD TR_____
12/04/19	8042871	Analyze issues regarding A. Taylor and advise Receiver regarding strategy for same (.3); initial work on letter and subpoena regarding same (.2).	Fates, Edward (Ted)	0.5	297.00	233,204.85	WO HD TR_____
12/04/19	8044239	Review letters regarding certain investments and transmit to K. Freitag for review (.3); confer with counsel regarding case administration issues (.2); review correspondence from Harold Stevens jewelers (.2).	Aspis, Norman	0.7	283.50	233,488.35	WO HD TR_____
12/05/19	8044784	Analyze and advise Receiver on issues and strategy relating to tenant at Valle Vista property (.7); work on letter to same (.9); communications with counsel for Champion-Cain regarding same (.2).	Fates, Edward (Ted)	1.8	1,069.20	234,557.55	WO HD TR_____
12/05/19	8046193	Confer with Wells Fargo representative regarding production issues; download production (.3).	Aspis, Norman	0.3	121.50	234,679.05	WO HD TR_____
12/06/19	8048609	Call with Receiver and follow-up with counsel re discovery/bank and CTC production, accounting.	Zaro, David	0.3	236.25	234,915.30	WO HD TR_____
12/06/19	8045982	Call with Receiver, counsel for Champion-Cain, and Champion-Cain regarding issues relating to Valle Vista property and tenant L. Palacios (.4); discuss same with Receiver (.1); follow up regarding document subpoena issues to Chicago Title (.2).	Fates, Edward (Ted)	0.7	415.80	235,331.10	WO HD TR_____



Trans Date	Index	Description of Service Rendered	Timekeeper	Hours	Fees	Sum	Circle	Action
12/06/19	8046952	Compile and transmit Wells' Fargo's production (.3).	Aspis, Norman	0.3	121.50	235,452.60	WO	HD TR_____
12/09/19	8050407	Calls with Receiver and counsel related to CTC discovery issues, production of accounting records.	Zaro, David	0.2	157.50	235,610.10	WO	HD TR_____
12/09/19	8048060	Work on letter and subpoena to A. Taylor regarding ANI documents and information (.4); follow up regarding status of outstanding document subpoenas (.2).	Fates, Edward (Ted)	0.6	356.40	235,966.50	WO	HD TR_____
12/09/19	8049185	Confer with financial institution representative regarding the status of a subpoena (.5); transmit productions in connection with certain subpoenas (.4); confer with subpoena recipient regarding objections and production (.2); draft letter and subpoena to A. Taylor and revise the same (.5).	Aspis, Norman	1.6	648.00	236,614.50	WO	HD TR_____
12/10/19	8048918	Revise document subpoena demanding bank records (.2); advise on issues regarding subpoena for Chicago Title documents (.1).	Fates, Edward (Ted)	0.3	178.20	236,792.70	WO	HD TR_____
12/11/19	8050113	Address issues regarding C. Riharb failure to produce documents in response to subpoena.	Fates, Edward (Ted)	0.2	118.80	236,911.50	WO	HD TR_____
12/11/19	8067644	Correspondence and strategy regarding Chicago Title claims.	Griffin, Peter	0.7	311.85	237,223.35	WO	HD TR_____
12/11/19	8052006	Attention to case administration in connection with subpoenas and follow-up with several subpoena recipients (1.1).	Aspis, Norman	1.1	445.50	237,668.85	WO	HD TR_____
12/12/19	8052447	Advise on service issues for A. Taylor	Fates, Edward (Ted)	0.9	534.60	238,203.45	WO	HD TR_____



Trans Date	Index	Description of Service Rendered	Timekeeper	Hours	Fees	Sum	Circle	Action
		subpoena and issues with lease for Diamond St. property (.4); advise on issues regarding Chicago Title response to subpoena and meet and confer (.2); advise Receiver on issues relating to bank records needed and subpoenas for same (.3).						
12/12/19	8052038	Correspond with counsel regarding case administration updates (.3); confer with subpoena recipients regarding certain subpoena issues and confer with counsel regarding the same (.5).	Aspis, Norman	0.8	324.00	238,527.45	WO HD	TR_____
12/13/19	8053381	Address and advise on issues regarding protective order and confidentiality for Chicago Title and City National Bank document productions (.6); discuss same with Receiver (.2).	Fates, Edward (Ted)	0.8	475.20	239,002.65	WO HD	TR_____
12/13/19	8065508	Analysis and determination of document productions in preparation for attorney review.	Peng, Simona	0.5	146.25	239,148.90	WO HD	TR_____
12/13/19	8071067	Review files from City National bank and transmit the same and confer regarding the same (.8); draft deposition notice for A. Taylor (.8).	Aspis, Norman	1.6	648.00	239,796.90	WO HD	TR_____
12/16/19	8061953	Advice to counsel as to CTC objections to discovery and possible protective order, revise email response.	Zaro, David	0.4	315.00	240,111.90	WO HD	TR_____
12/16/19	8054546	Advise Receiver on issues regarding A. Taylor (.2); communications with counsel for Champion-Cain regarding same (.2); revisions to draft	Fates, Edward (Ted)	1.3	772.20	240,884.10	WO HD	TR_____

Trans Date	Index	Description of Service Rendered	Timekeeper	Hours	Fees	Sum	Circle	Action
		communication to Chicago Title regarding subpoena and privacy concerns regarding bank records (.3); advise Receiver regarding analysis of claims and recovery strategy regarding W. Adams law firm (.6).						
12/16/19	8057344	Confer with counsel regarding Chicago Title issues and draft email to Chicago Title's counsel (.8); serve subpoena to A. Taylor on the parties and confer with counsel regarding the same (.2); review incoming files from Wells Fargo (.2); review correspondence from Chicago Title and cited case law (.5).	Aspis, Norman	1.7	688.50	241,572.60	WO HD	TR_____
12/17/19	8062494	Work on several issues related to the bank subpoenas to the Bank Direct, CTC and other banks, including research related to privacy rights, protective order (1.2). Several conferences and emails related to the subpoenas and accounting (.5).	Zaro, David	1.7	1,338.75	242,911.35	WO HD	TR_____
12/17/19	8056125	Advise on issues regarding meet and confer for document subpoena issued to Chicago Title and protective order (.9); advise on response to letter from counsel for A. Taylor (.2); discuss same with Receiver (.1).	Fates, Edward (Ted)	1.2	712.80	243,624.15	WO HD	TR_____
12/17/19	8057287	Prepare for and participate in meet-and-confer with Chicago Title's counsel and confer with internal counsel regarding the same (2.1); review correspondence from A. Taylor's attorney and confer with counsel regarding the same (.3);	Aspis, Norman	3.1	1,255.50	244,879.65	WO HD	TR_____

Trans Date	Index	Description of Service Rendered	Timekeeper	Hours	Fees	Sum	Circle	Action
		confer with counsel regarding certain issues in connection with subpoenas (.3); draft letter regarding stay of all legal action against receivership entities (.4).						
12/18/19	8062524	Call/email and analysis of the CTC discovery dispute re bank and other records (.5). Call with counsel to address bank subpoena/privacy (.3). Follow-up on email and draft of the protective order, email to propose changes to protective order (1.0)	Zaro, David	1.8	1,417.50	246,297.15	WO HD	TR_____
12/18/19	8067609	Various conferences, analysis, review of documents and exchange of e-mails re: Chicago Title objections to subpoenas and strategy to address same (1.4); reviewed authority re: privacy and protective orders and exchanged e-mails re: same (1.2); drafted response to Chicago Title counsel (.4).	Farrell, Michael	3.0	2,146.50	248,443.65	WO HD	TR_____
12/18/19	8063006	Research and forward documents regarding Kim Peterson lawsuits; review and respond to emails.	Kaup, John	0.4	117.00	248,560.65	WO HD	TR_____
12/18/19	8057440	Advise on issues regarding A. Taylor subpoena and move out of rental property (.4); advise Receiver on issues relating to Chicago Title subpoena and protective order (.3).	Fates, Edward (Ted)	0.7	415.80	248,976.45	WO HD	TR_____
12/18/19	8057354	Confer with counsel regarding subpoena to A. Taylor and corresponding deposition, and confer with A. Taylor's counsel regarding the same (.4); draft letter to Pace Supply	Aspis, Norman	3.1	1,255.50	250,231.95	WO HD	TR_____

Trans Date	Index	Description of Service Rendered	Timekeeper	Hours	Fees	Sum	Circle Action
		regarding mechanic's lien (.3); confer with recipients of subpoenas including Union Bank, JPMorgan Chase, and Seattle Funding, and confer with counsel regarding the same (.9); attention to issues in connection with City National Bank production, including analyzing case law regarding federal privacy issues, and confer with counsel regarding the same (1.5).					
12/19/19	8062549	Analysis of the ongoing discovery issues, follow-up concerning the bank subpoenas, the CTC objection and strategy, issues and protective order (.7).	Zaro, David	0.7	551.25	250,783.20	WO HD TR_____
12/19/19	8067359	Conferences, analysis and review of e-mail from M. Donohue re: conference with magistrate on subpoena issues.	Farrell, Michael	0.6	429.30	251,212.50	WO HD TR_____
12/19/19	8060445	Analyze letter from counsel for D. Champion (.1); call with SEC counsel regarding insurance policy issues (.2).	Fates, Edward (Ted)	0.3	178.20	251,390.70	WO HD TR_____
12/19/19	8070778	Review proposed protective order regarding Chicago Title documents and correspondence from Chicago Title regarding informal discovery conference and confer with counsel regarding the same (.8); confer with counsel for A. Taylor regarding interview and deposition (.3); confer with counsel for Charles Riharb regarding subpoena response (.3); finalize letters to two recipients for transmittal (.2).	Aspis, Norman	1.6	648.00	252,038.70	WO HD TR_____

Trans Date	Index	Description of Service Rendered	Timekeeper	Hours	Fees	Sum	Circle	Action
12/20/19	8065487	Call/email with counsel re D Street, call with Receiver re liens (.2). Analysis of development proposed for Pullman lofts and appraisal, call with the Receiver related to strategy (.8).	Zaro, David	1.2	945.00	252,983.70	WO	HD TR_____
12/20/19	8064394	Various conferences and analysis re: forthcoming telephonic hearing and strategy for same (.5); review, analysis and revision of draft edits to proposed protective order (.6); reviewed applicable documents and case law in preparation for hearing (.8); participation in telephonic hearing and analysis re: results of same (.9); conferences and analysis re: results of hearing and potential resolution of Union Bank subpoena issues (.6).	Farrell, Michael	3.4	2,432.70	255,416.40	WO	HD TR_____
12/20/19	8061618	Analyze response from counsel for SFG regarding concerns raised regarding loans (.4); advise Receiver regarding same (.1); communications with counsel representing investors regarding Chicago Title dispute relating to bank subpoenas (.3); advise on issues regarding costs associated with SFG document production (.3); analyze order granting protective order and setting status conference, advise Receiver regarding same (.2).	Fates, Edward (Ted)	1.3	772.20	256,188.60	WO	HD TR_____
12/20/19	8070515	Review and provide edits/comments to proposed protective order in connection with Chicago Title records from third-party institutions; confer	Aspis, Norman	3.3	1,336.50	257,525.10	WO	HD TR_____

Trans Date	Index	Description of Service Rendered	Timekeeper	Hours	Fees	Sum	Circle	Action
		with counsel regarding the same (1.6); analyze case law regarding privacy issues in connection with third-party records (1); confer with counsel regarding A. Taylor informal interview (.3); confer with counsel regarding Seattle Funding Group subpoena response and review Seattle Funding Group correspondence (.4).						
12/23/19	8065818	Follow-up email/letter related to Seattle Funding Group, discovery and investigation of transactions (.4).	Zaro, David	0.4	315.00	257,840.10	WO	HD TR_____
12/23/19	8066385	Conferences and analysis re: follow up to court appearance and strategy for addressing scope of subpoenas (.6); continued review and analysis of memorandum and other materials re: potential claims against former counsel (1.1).	Farrell, Michael	1.7	1,216.35	259,056.45	WO	HD TR_____
12/23/19	8063614	Communications with counsel for Champion-Cain regarding issues with email domain and preservation of data.	Fates, Edward (Ted)	0.2	118.80	259,175.25	WO	HD TR_____
12/23/19	8070411	Review productions from Charles Riharb and JP Morgan Chase; upload and transmit the same (.8); review correspondence from Western Alliance Bank regarding subpoena and correspondence from R. Kuhn regarding M. Spicer claim (.2).	Aspis, Norman	1.0	405.00	259,580.25	WO	HD TR_____
12/26/19	8067101	Emails with counsel and Receiver re intervention issues, loan terms as to American International, other lenders	Zaro, David	0.9	708.75	260,289.00	WO	HD TR_____

Trans Date	Index	Description of Service Rendered	Timekeeper	Hours	Fees	Sum	Circle	Action
		(.6). Review draft of opposition, revisions to the brief (.3).						
12/26/19	8066228	Analysis and determination of document productions in preparation for attorney review.	Peng, Simona	0.5	146.25	260,435.25	WO HD	TR_____
12/26/19	8070171	Review and transmit productions from Charles Riharb and Well Fargo (.6).	Aspis, Norman	0.6	243.00	260,678.25	WO HD	TR_____
12/27/19	8066278	Further review of court order re: subpoenas and analysis re: timing and content of meet and confer before subsequent hearing.	Farrell, Michael	0.4	286.20	260,964.45	WO HD	TR_____
12/27/19	8070079	Review and revise subpoena list (.4).	Aspis, Norman	0.4	162.00	261,126.45	WO HD	TR_____
12/30/19	8068323	Review and analysis of court order re: meet and confer obligation (.2); review, analysis and exchange of e-mails re: contact with Chicago Title and timing of meet and confer (.3); outlined issues to be addressed in conference (.3).	Farrell, Michael	0.8	572.40	261,698.85	WO HD	TR_____
12/30/19	8069839	Prepare letter to recipient to withdraw a mechanic's lien (.4); draft email to D. Kirby regarding Seattle Funding Group's production (.3); review correspondence from R. Kuhn regarding Margaret Spicer claim (.4).	Aspis, Norman	1.1	445.50	262,144.35	WO HD	TR_____
12/31/19	8068833	Review and analysis of meet and confer e-mail from Chicago Title (.2); review, analysis and exchange of e-mails re: strategy to respond to same (.4); reviewed subpoena and pertinent documents (.3).	Farrell, Michael	0.9	643.95	262,788.30	WO HD	TR_____
12/31/19	8069531	Advise on issues relating to document	Fates, Edward (Ted)	0.2	118.80	262,907.10	WO HD	TR_____

Trans Date	Index	Description of Service Rendered	Timekeeper	Hours	Fees	Sum	Circle Action
		subpoena to Union Bank, confidentiality concerns and protective order.					
12/31/19	8069798	Review correspondence from counsel regarding upcoming informal discovery conference with magistrate judge Goddard regarding subpoena to Union Bank (.2).	Aspis, Norman	0.2	81.00	262,988.10	WO HD TR_____

### Proforma Summary

Timekeeper Number	Timekeeper	Hours	Rate	Amounts
000313	David Zaro	82.7	787.50	65,126.25
000739	Michael Farrell	89.1	715.50	63,751.05
000820	John Kaup	17.7	292.50	5,177.25
001665	Edward (Ted) Fates	142.3	594.00	84,526.20
002209	Peter Griffin	0.7	445.50	311.85
002307	Simona Peng	7.2	292.50	2,106.00
002348	Rebecca Williams	13.0	301.50	3,919.50
002369	Norman Aspis	94.0	405.00	38,070.00
		446.7		262,988.10
Total Fees				262,988.10
Total Disbursements				0.00

### Attorney Billing Instructions

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

### Billing Instructions

expires 6/30/2020: 10% off standard rates (automatic); no text editing; copies @ .10

### Account Summary- As Of 12/31/2019

Fiscal YTD	Calendar YTD	LTD
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	Total	Fees	Disbursement	Total	Fees	Disbursement	Total	Fees	Disbursement
Worked	262,988.10	262,988.10	0.00	262,988.10	262,988.10	0.00	262,988.10	262,988.10	0.00
Unbilled Adj	0.00	0.00	0.00	(4,261.50)	(4,261.50)	0.00	(4,261.50)	(4,261.50)	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
	<b>Total</b>	<b>Fees</b>	<b>Cost</b>						
<b>WIP Balance</b>	<b>319,351.35</b>	<b>319,343.85</b>	<b>7.50</b>						
<b>AR Balance</b>	<b>0.00</b>	<b>0.00</b>	<b>0.00</b>						
<b>Unalloc Payment</b>	<b>0.00</b>								
<b>Client Trust Balance</b>	<b>0.00</b>								

### Billing Address

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

02/14/20 10:00:51 PROFORMA STATEMENT FOR MATTER 378827-00004 (Krista Freitag, as Receiver for ANI Development, LLC, et al.) (SEC v. Champion-Cain - Reporting)

### Preliminary Billing Form

Billing Atty: 001665 - Edward Fates

Matter #: 378827-00004

Matter Name: SEC v. Champion-Cain - Reporting

Date of Last Billing:

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

Proforma Number 1456087

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
09/27/19	7970887	Discuss content and plan for preliminary report with Receiver.	Fates, Edward (Ted)	0.4	237.60	237.60	WO HD TR_____
09/28/19	7971144	Work on initial Receiver's report and motion for order in aid of receivership (.4); advise Receiver re same (.3).	Fates, Edward (Ted)	0.7	415.80	653.40	WO HD TR_____
09/30/19	7972423	Work on Receiver's initial report and motion for order in aid of receivership.	Fates, Edward (Ted)	0.6	356.40	1,009.80	WO HD TR_____
10/01/19	7978433	Calls/emails with counsel concerning Receiver report/accounting and advice as to the scope (.4). Email to client related to the Receiver Report/Investor letter (.2).	Zaro, David	0.6	472.50	1,482.30	WO HD TR_____
10/01/19	7976767	Work on report/motion for order in aid of receivership (2.6); discuss same with Receiver (.3).	Fates, Edward (Ted)	2.9	1,722.60	3,204.90	WO HD TR_____
10/02/19	7981217	Review the Receiver's draft report/accounting and motion in aid of receivership (1.0). Conference with counsel, advice concerning motion/recommendations and order in aid of receivership (.3).	Zaro, David	1.3	1,023.75	4,228.65	WO HD TR_____
10/02/19	7978153	Work on Receiver's initial report and	Fates, Edward (Ted)	3.9	2,316.60	6,545.25	WO HD TR_____

Trans Date	Index	Description of Service Rendered	Timekeeper	Hours	Fees	Sum	Circle	Action
		motion for order in aid of receivership (3.7); meet and confer communications with Champion-Cain counsel regarding same (.2).						
10/03/19	8012176	Analysis of accounting and valuation data/report and advice to Receiver/counsel (.4). Call/work on report/revisions, advice to counsel and follow-up emails re same (1.1).	Zaro, David	1.5	1,181.25	7,726.50	WO	HD TR_____
10/03/19	7978878	Work on schedule of real estate, investments/loans, and liquor license assets for initial report/motion (2.4); work on report and motion for order in aid of receivership (4.8); discuss revisions to same and exhibits with Receiver (1.9); call with court chambers regarding hearing date for motion (.1); meet and confer communications with SEC counsel (.6); prepare proposed order for motion (.3).	Fates, Edward (Ted)	10.1	5,999.40	13,725.90	WO	HD TR_____
10/09/19	7983504	Prepare notice of hearing for initial report per local rule and address issues regarding service on known creditors (.6); analyze correspondence from G. Aguirre regarding notice of motion/report and update Receiver regarding same (.2).	Fates, Edward (Ted)	0.8	475.20	14,201.10	WO	HD TR_____
10/10/19	7986923	Analyze issues raised in investor response to motion for order in aid/initial report (.2); advise Receiver regarding same (.1).	Fates, Edward (Ted)	0.3	178.20	14,379.30	WO	HD TR_____
11/04/19	8011160	Analyze issues raised in American National Insurance response to	Fates, Edward (Ted)	0.6	356.40	14,735.70	WO	HD TR_____

Trans Date	Index	Description of Service Rendered	Timekeeper	Hours	Fees	Sum	Circle	Action
		motion for order in aid of receivership (.4); discuss same with Receiver (.2).						
11/05/19	8011700	Work on reply to Edelman Investors opposition to report and motion for order in aid of receivership (4.1); discuss same with Receiver (.4).	Fates, Edward (Ted)	4.5	2,673.00	17,408.70	WO	HD TR_____
11/06/19	8015308	Review/analysis of the opposition and responses to the Receiver's Motion for Order in and of Receivership and related declarations, exhibits and then draft ANICO reply brief and follow-up thereon (1.8).	Zaro, David	1.8	1,417.50	18,826.20	WO	HD TR_____
11/06/19	8012817	Work on reply to Statement of Caldarelli investors regarding report and motion for order in aid.	Fates, Edward (Ted)	0.6	356.40	19,182.60	WO	HD TR_____
11/07/19	8015082	Work on reply brief re: motion for order in aid, discuss same with Receiver	Fates, Edward (Ted)	1.2	712.80	19,895.40	WO	HD TR_____
11/08/19	8020213	Revise response/reply brief, address issues re motion in aid of receivership and call with counsel.	Zaro, David	0.6	472.50	20,367.90	WO	HD TR_____
11/08/19	8016651	Finalize reply brief in support of motion for order in aid.	Fates, Edward (Ted)	0.9	534.60	20,902.50	WO	HD TR_____
11/14/19	8023617	Respond to inquiry from counsel for Champion-Cain regarding request to appear at 11/18 hearing by telephone (.1); discuss issues and preparation for 11/18 hearing with Receiver (.4).	Fates, Edward (Ted)	0.5	297.00	21,199.50	WO	HD TR_____
11/15/19	8025151	Analyze minute order regarding 11/18 hearing and advise Receiver regarding same and preparation for hearing (.9); confer with SEC counsel	Fates, Edward (Ted)	1.1	653.40	21,852.90	WO	HD TR_____

Trans Date	Index	Description of Service Rendered	Timekeeper	Hours	Fees	Sum	Circle Action
		regarding minute order and hearing (.2).					
11/18/19	8090390	Call/email concerning the hearing on order in aid of receivership.	Zaro, David	0.4	315.00	22,167.90	WO HD TR_____
11/18/19	8026350	Prepare for hearing on report/motion for order in aid, meet with Receiver to discuss same (1.7); attend hearing (1.6); confer with counsel for investor groups (.7); confer with SEC counsel (.3).	Fates, Edward (Ted)	4.4	2,613.60	24,781.50	WO HD TR_____
11/22/19	8031687	Analyze order on motion for order in aid of receivership and advise Receiver regarding same.	Fates, Edward (Ted)	0.2	118.80	24,900.30	WO HD TR_____

Proforma Summary

Timekeeper Number	Timekeeper	Hours	Rate	Amounts
000313	David Zaro	6.2	787.50	4,882.50
001665	Edward (Ted) Fates	33.7	594.00	20,017.80
		39.9		24,900.30
Total Fees				24,900.30
Total Disbursements				0.00

Attorney Billing Instructions

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

Billing Instructions

expires 6/30/2020: 10% off standard rates (automatic); no text editing; copies @ .10

Account Summary- As Of 12/31/2019

Fiscal YTD				Calendar YTD				LTD	
	Total	Fees	Disbursement	Total	Fees	Disbursement	Total	Fees	Disbursement
Worked	24,921.30	24,900.30	21.00	24,921.30	24,900.30	21.00	24,921.30	24,900.30	21.00
Unbilled Adj	(21.00)	0.00	(21.00)	0.00	0.00	0.00	(21.00)	0.00	(21.00)
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
	<b>Total</b>	<b>Fees</b>	<b>Cost</b>						
<b>WIP Balance</b>	<b>35,130.15</b>	<b>35,130.15</b>	<b>0.00</b>						
<b>AR Balance</b>	<b>0.00</b>	<b>0.00</b>	<b>0.00</b>						
<b>Unalloc Payment</b>	<b>0.00</b>								
<b>Client Trust Balance</b>	<b>0.00</b>								

### Billing Address

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

02/14/20 10:00:51 PROFORMA STATEMENT FOR MATTER 378827-00005 (Krista Freitag, as Receiver for ANI Development, LLC, et al.) (SEC v. Champion-Cain - Operations & Asset Sales)

### ***Preliminary Billing Form***

Billing Atty: 001665 - Edward Fates

Matter #: 378827-00005

Matter Name: SEC v. Champion-Cain - Operations & Asset Sales

Date of Last Billing:

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

Proforma Number 1456088

Client/Matter Joint Group # 378827-1

#### **Fees for Matter 378827-00005 (SEC v. Champion-Cain - Operations & Asset Sales)**

Trans Date	Index	Description of Service Rendered	Timekeeper	Hours	Fees	Sum	Circle Action
09/04/19	7948512	Meetings with Receiver, Champion-Cain and ANI personnel to discuss ongoing business operations, key contracts and upcoming deadlines, and legal issues to be addressed (3.2); meet with Receiver and G. Rodriguez to discuss plan for engagement of brokers, property sales, and court approval of same (.7).	Fates, Edward (Ted)	3.9	2,316.60	2,316.60	WO HD TR_____
09/05/19	7949025	Prepare NDA for prospective transaction with J. McGrory re: 301 D Street property (1.1); meeting with T. Hebrank and in house counsel for ANI re: insurance policy renewals (.5); discuss issues with maintenance of existing trademarks with in-house counsel (.4); advise Receiver re: operational issues, employee terminations, security concerns, and related issues (1.3).	Fates, Edward (Ted)	3.3	1,960.20	4,276.80	WO HD TR_____
09/05/19	7952917	Analysis of issues relating to proposed terminations.	Thorbourn-Carlyle, Alan	a 0.4	203.40	4,480.20	WO HD TR_____
09/06/19	7949856	Prepare confidentiality agreement for	Fates, Edward (Ted)	1.9	1,128.60	5,608.80	WO HD TR_____

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		potential restaurant management contract, discuss same with Receiver (.7); address issues regarding employee terminations and unpaid PTO, communications with Receiver and T. Hebrank regarding same (.8); advise Receiver on engagement of security guard and message to employees regarding security concerns at ANI office (.4).						
09/07/19	7950352	Advise Receiver regarding concerns with employee tenants at ANI rental properties.	Fates, Edward (Ted)	0.2	118.80	5,727.60	WO HD	TR_____
09/08/19	7950425	Communications with ANI broker for pending sale of property in Petaluma CA (.4); communications with Receiver and escrow for pending Lamont Street sale (.3).	Fates, Edward (Ted)	0.7	415.80	6,143.40	WO HD	TR_____
09/09/19	7952103	Meetings/communications with Receiver and HR personnel regarding ANI employee layoffs and legal issues regarding same (2.4); communications with brokers and escrow/title companies regarding pending sales for Thomas St., Lamont St., and Petaluma properties (.8); discuss same with Receiver and G. Rodriguez (.4).	Fates, Edward (Ted)	3.6	2,138.40	8,281.80	WO HD	TR_____
09/10/19	7953318	Call with insurance broker and T. Hebrank regarding insurance policy renewals and coverage issues (1.3); advise Receiver regarding same (.4); attend Receiver meeting with ANI employees regarding operational issues and questions (.6); call with	Fates, Edward (Ted)	3.6	2,138.40	10,420.20	WO HD	TR_____



Trans Date	Index	Description of Service Rendered	Timekeeper	Hours	Fees	Sum	Circle Action
		outside PR consultant (.4); assist in preparing talking points about case and ongoing operations for ANI employees (.5); call/emails with counsel for escrow company regarding pending Thomas and Lamont Street sales (.4).					
09/11/19	7953718	Call/emails with AXOS Bank re: loans made to ANI entities, documents needed, and pending sale of Thomas St. property (.6); communications with counsel for escrow company for Thomas St. (.2); analyze and advise Receiver on potential termination of ANI restaurant management contract (.6); analyze and advise Receiver on potential termination of hotel management contract (.5); advise Receiver on termination of valuation consultant agreement (.2); communications with escrow and title companies for Thomas St. sale (.4); advise Receiver on insurance policy renewal issues, communications with insurance broker re: same (.8).	Fates, Edward (Ted)	3.3	1,960.20	12,380.40	WO HD TR_____
09/12/19	7955247	Advise Receiver and G. Rodriguez regarding title issues for Thomas St. sale (.2); discuss requests from ANI in-house counsel regarding outside counsel for ANI and insurance coverage with Receiver (.4); respond to in-house counsel regarding same (.3); call with counsel for Chicago Title regarding Thomas St. sale (.4); update Receiver regarding same (.2); communications with counsel for	Fates, Edward (Ted)	3.3	1,960.20	14,340.60	WO HD TR_____

Trans Date	Index	Description of Service Rendered	Timekeeper	Hours	Fees	Sum	Circle Action
		Biomed regarding restaurant service contract and request regarding ANI website (.3); discuss same with Receiver (.1); analyze in-house counsel summary of trademarks/IP and outstanding items (.6); call with outside counsel for ANI regarding pending trademark/IP issues (.4); initial review of proposals received regarding Pullman and 301 D Street projects, communications with Receiver regarding same (.4).					
09/13/19	7957128	Call with counsel for Chicago Title regarding pending escrow/title for Keller St. sale (.2); call with outside counsel for ANI regarding potential representation of J. McGrory and conflict concerns regarding same (.4); discuss questions and answers regarding receivership for ANI personnel with Receiver, revisions to same (.8); communications with counsel for Biomed regarding ANI website issue (.2).	Fates, Edward (Ted)	1.6	950.40	15,291.00	WO HD TR_____
09/14/19	7957473	Advise Receiver on issues relating to pre-receivership tax returns for ANI entities (.3) discuss revisions to rental agreements for ANI properties with Receiver (.2).	Fates, Edward (Ted)	0.5	297.00	15,588.00	WO HD TR_____
09/16/19	7957703	Discuss VRBO and Air BNB vacation rental agreement terms with Receiver (.2); work on updating same (.6); revisions to draft responses to media and customer inquiries from PR consultant (.3); discuss same with Receiver (.1); advise Receiver on	Fates, Edward (Ted)	3.1	1,841.40	17,429.40	WO HD TR_____

Trans Date	Index	Description of Service Rendered	Timekeeper	Hours	Fees	Sum	Circle Action
		abandonment of certain unused trademarks, communications with ANI in-house counsel regarding same (.2); communications with G. Rodriguez regarding change in title company for pending sales and related issues (.3); analyze and advise on correspondence from prospective purchase for Keller Street property regarding purchase price reduction (.2); discuss employee terminations and restaurant closures with Receiver (.2); communications with Receiver and G. Rodriguez regarding properties in San Diego county for recording order (.4); discuss WARN Act concerns with Receiver and ANI personnel, initial work on same (.4); advise Receiver on engagement of liquor license consultant (.2).					
09/16/19	7957705	Review and revise form of residential lease agreement; research requirements for disclosures required under applicable law for residential leases; review rules and regulations for residential leases.	Lorenzen, Jonathan	4.4	2,296.80	19,726.20	WO HD TR_____
09/17/19	7959194	Advise Receiver on potential restaurant closures, timing/strategy, security issues, and inventory/auction of equipment (.9); analyze issues with termination of leases on ANI residential properties (.3); advise G. Rodriguez on issues with utility payments for leased residential properties (.3); call/emails with Receiver and ANI personnel	Fates, Edward (Ted)	2.8	1,663.20	21,389.40	WO HD TR_____

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		regarding WARN Act issues with employee terminations (.8); communications with Receiver and counsel regarding rules and regulations for AirBNB rentals (.5).						
09/17/19	7959214	Review and revise Rules and Regulations for short-term residential lease; complete additional revisions to Lease.	Lorenzen, Jonathan	2.6	1,357.20	22,746.60	WO	HD TR_____
09/17/19	7959583	Advise receiver regarding Cal-WARN Act with respect to employees.	Bell, Melissa	0.7	283.50	23,030.10	WO	HD TR_____
09/17/19	7960869	Strategize regarding issues for client relating to WARN Act and potential reductions in force.	Alexander, Grant	0.3	187.65	23,217.75	WO	HD TR_____
09/18/19	7961133	Revisions to vendor notification letter (.4); communications with L. Ryan regarding same (.2); advise T. Hebrank on employee issue regarding auto loan payments (.3); call with Receiver and outside PR consultant regarding possible restaurant closures and media messaging (.5); meeting with ownership and management team for Casa del Zorro regarding termination of management contract and related issues (.6); meeting with J. McGrory regarding proposals regarding development projects and related issues (.5); call with Receiver and prospective restaurant operator, advise Receiver regarding same (.7).	Fates, Edward (Ted)	3.2	1,900.80	25,118.55	WO	HD TR_____
09/19/19	7964446	Review and analysis of leases for retail and restaurant spaces and	Kaup, John	3.0	877.50	25,996.05	WO	HD TR_____

Trans Date	Index	Description of Service Rendered	Timekeeper	Hours	Fees	Sum	Circle	Action
		prepare summary chart regarding removal of personal property and fixtures upon termination of leases.						
09/19/19	7962149	Review default letter from contractor on 301 D Street, advise Receiver regarding same (.2); work on notification letter to contractor (.5); analyze issues with former employee leases on ANI residential properties (.4); analyze and advise Receiver on issues with restaurant closures and removal of personal property (.8); communications with Receiver and PR consultant regarding closures and messaging regarding same (.4); confer with SEC counsel regarding same (.2); advise Receiver on issues with cash shortage and inability to pay PTO for terminated employees (.4); advise Receiver on water issues raised by rental tenant (.2).	Fates, Edward (Ted)	3.1	1,841.40	27,837.45	WO HD	TR_____
09/19/19	7963372	Draft letter to TriCorp regarding self-help bar (.3); confer with counsel regarding the same (.1).	Aspis, Norman	0.4	162.00	27,999.45	WO HD	TR_____
09/20/19	7963453	Advise Receiver on cash crisis and legal issues, including timing of debt service obligations and issues with potential restaurant closures (.9); advise L. Ryan regarding lender notification letters (.2); call with counsel for secured lender (.2); initial work on amendments to purchase contracts for pending real property sales, communications with G. Rodriguez and broker regarding same (.5); analyze letter from Hiscox	Fates, Edward (Ted)	2.4	1,425.60	29,425.05	WO HD	TR_____

Trans Date	Index	Description of Service Rendered	Timekeeper	Hours	Fees	Sum	Circle	Action
		regarding denial of coverage for professional liability claim (.3); advise Receiver on issues with closure/termination of restaurant service contracts for office buildings (.3).						
09/20/19	7964233	Review purchase and sale agreements for restaurant properties; prepare amendments; review terms of restaurant management agreement.	Lorenzen, Jonathan	1.9	991.80	30,416.85	WO HD	TR_____
09/21/19	8012164	Conference/email with the Receiver concerning the retention of consultant/Manager for restaurants (.6).	Zaro, David	0.6	472.50	30,889.35	WO HD	TR_____
09/22/19	7968736	Analysis of proposed operating agreement form issues as to the scope of work, indemnity issues, follow-up emails re advice to Receiver/counsel.	Zaro, David	1.1	866.25	31,755.60	WO HD	TR_____
09/22/19	7964692	Advise Receiver on issues relating to retail outlet closures, potential restaurant management contract, and press release regarding same (1.1); work on potential management contract (.6).	Fates, Edward (Ted)	1.7	1,009.80	32,765.40	WO HD	TR_____
09/22/19	7964718	Prepare initial draft of restaurant Operating and Management Agreement; review terms of proposed operations by Cohn Group; review PSAs for properties within the receivership.	Lorenzen, Jonathan	4.9	2,557.80	35,323.20	WO HD	TR_____
09/23/19	7965116	Address issues regarding upcoming closure of restaurants, concerns with retention of employees,	Fates, Edward (Ted)	3.8	2,257.20	37,580.40	WO HD	TR_____

Trans Date	Index	Description of Service Rendered	Timekeeper	Hours	Fees	Sum	Circle	Action
		communications with landlords/locations regarding same (.7); discuss press release and questions/answers for media inquiries with Receiver and PR consultant (.9); advise Receiver and T. Hebrank on insurance coverage issues (.4); call with counsel for J. McGrory regarding issues relating to 301 D Street and potential sale of property (.4); discuss same with Receiver (.2); communications with counsel for subcontractor on 301 D Street project (.2); advise Receiver on proposal regarding termination of Casa del Zorro management contract (.3); work on revisions to restaurant management contract, discuss same with Receiver (.7).						
09/23/19	7965446	Review proposed employment agreement from Flores Accounting; discuss Operating and Management Agreement for Cohn Group; revise Agreement.	Lorenzen, Jonathan	1.8	939.60	38,520.00	WO	HD TR_____
09/24/19	7966128	Discuss restaurant closures, loan and debt service issues, employee retention concerns, and related issues with Receiver (.7); advise Receiver on issues relating to closure of dessert restaurant, sale of equipment, and termination of chef (.3); revisions to contract for outside accounting and HR services for restaurants (.4); discuss EPLI and D&O insurance coverage issues with Receiver and T. Hebrank (.6); advise	Fates, Edward (Ted)	3.3	1,960.20	40,480.20	WO	HD TR_____

Trans Date	Index	Description of Service Rendered	Timekeeper	Hours	Fees	Sum	Circle	Action
		T. Hebrank on trademark-related issues (.2); call from counsel for subcontractor on 301 D Street project (.4); work on joint motion to approve sale of Thomas Street property (.4); advise Receiver on revisions to restaurant management contract (.2); address issues regarding termination of restaurant leases and removal/sale of equipment (.2).						
09/24/19	7966075	Review restaurant operating issues and related retail provisions for operational standards; complete additional revisions to Operating and Management Agreement; review and respond to correspondence regarding Agreement, and revise accordingly; prepare discussion draft for Manager's review.	Lorenzen, Jonathan	3.8	1,983.60	42,463.80	WO HD	TR_____
09/24/19	7967186	Review agreement documentation and analyze issues regarding management agreement.	Bell, Melissa	1.0	405.00	42,868.80	WO HD	TR_____
09/24/19	8011941	Draft and transmit notice to terminate property located at 4020 Goldfinch, San Diego, CA (.7).; confer with landlords and landlord's representatives regarding certain properties and counsel regarding the same (.6).	Aspis, Norman	1.3	526.50	43,395.30	WO HD	TR_____
09/25/19	7967689	Communications with Receiver and PR consultant regarding responses to media inquiries and related issues (.4); analyze and advise on employment law concerns with restaurant management contract and	Fates, Edward (Ted)	4.1	2,435.40	45,830.70	WO HD	TR_____



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		outside HR/accounting contract (.5); advise on responses to inquiries from landlords and their counsel (.4); work on joint motion and proposed order regarding sale of Thomas St. property (1.4); discuss same with Receiver and G. Rodriguez (.3); discuss amendment to lease at Hines building with Receiver and counsel (.4); communications with outside counsel for ANI regarding interest in Cultivate assets (.3); advise Receiver regarding same (.1); respond to inquiry from counsel for restaurant landlord (.3).						
09/25/19	7967196	Review proposed terms of agreement from Flores Financial Services; review employment issues in connection with such agreement and the Operating and Management Agreement with Cohn Group.	Lorenzen, Jonathan	1.9	991.80	46,822.50	WO	HD TR_____
09/25/19	7968316	Continue to review agreement documentation and analyze issues regarding management agreement.	Bell, Melissa	1.1	445.50	47,268.00	WO	HD TR_____
09/25/19	7968428	Confer with counsel regarding case administration and issues with certain assets (.4); review documents regarding 301 D Street Apartments (.2); confer with landlords in connection with certain properties (.2).	Aspis, Norman	0.8	324.00	47,592.00	WO	HD TR_____
09/25/19	7969712	Analyze potential independent contractor classification issues for client; strategize regarding same.	Alexander, Grant	0.6	375.30	47,967.30	WO	HD TR_____
09/26/19	8012168	Call/analysis of operations issues with	Zaro, David	0.6	472.50	48,439.80	WO	HD TR_____

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		Receiver, legal issues related to management contract, insurance and risks re indemnity (.6).						
09/26/19	7969208	Call/emails with T. Hebrank and ANI in-house counsel regarding trademarks issues and potential sales (.7); work on lease amendment with Hines-Intersect and amendments to purchase and sale agreements for pending property sales (.5); discuss same with G. Rodriguez (.2); discuss issues with closure of restaurants in office buildings and issues with maturing mortgages with Receiver (.4); work on amendments to pending sale contracts for Thomas St., Lamont St. and Keller St. (1.1); discuss same with G. Rodriguez (.3); discuss letters to landlords regarding closed restaurants and related issues (.3); work on same (.7); communications with landlord regarding potential lease amendment, discuss same with Receiver (.4).	Fates, Edward (Ted)	4.6	2,732.40	51,172.20	WO HD	TR_____
09/26/19	7969580	Review purchase and sale agreements and documents related to receivership properties; discuss related issues; complete preparation of amendments for 4205 Lamont and 1617 Thomas.	Lorenzen, Jonathan	4.2	2,192.40	53,364.60	WO HD	TR_____
09/26/19	7974484	Begin drafting the Second Amendment to the lease between The Patio Marketplace LP and Quintana Office Property LLC; review and analyze the underlying lease	Thiels, Megan	4.2	1,360.80	54,725.40	WO HD	TR_____

Trans Date	Index	Description of Service Rendered	Timekeeper	Hours	Fees	Sum	Circle Action
		documents as necessary.					
09/26/19	7975623	Draft form letters to landlords depending on specific circumstances of lease (.9); review comments regarding the same (.2); revise letters based on comments and transmit (.4); review correspondence from Tricorp Group (.2).	Aspis, Norman	1.7	688.50	55,413.90	WO HD TR_____
09/27/19	7970151	Discuss proposed terms of amendment to CDZ management agreement with Receiver (.4); work on revisions to Flores accounting and HR contract (.2); communications with Receiver and landlord regarding potential terms of continued restaurant operations (.6); work on independent contractor agreement for certain ANI personnel (.7); discuss same with Receiver (.2); advise on terms for potential amendment to Hines-Intersect lease (.3); communications with outside ANI counsel regarding Cultivate assets (.2); revisions to subpoenas to bank, escrow companies, art dealer and jeweler (.3); advise on issues regarding termination of in-house counsel and potential transition to independent contractor (.4).	Fates, Edward (Ted)	3.3	1,960.20	57,374.10	WO HD TR_____
09/27/19	7970475	Review and revise Lease Amendment for Hines Intersect restaurant; review revisions to Management and Operating Agreement; review and revise PSA documents.	Lorenzen, Jonathan	4.3	2,244.60	59,618.70	WO HD TR_____
09/27/19	8011950	Confer with landlord regarding issues	Aspis, Norman	0.2	81.00	59,699.70	WO HD TR_____

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		in connection with particular lease (.2).					
09/28/19	7971120	Analyze issues with restaurant management contract (.4); discuss same with Receiver (.2); advise Receiver on concerns with employee theft at closing restaurants (.2).	Fates, Edward (Ted)	0.8	475.20	60,174.90	WO HD TR_____
09/28/19	7971127	Review revised version of Restaurant Management Agreement from Cohn; discuss issues; prepare redraft of Agreement and send for review.	Lorenzen, Jonathan	2.6	1,357.20	61,532.10	WO HD TR_____
09/28/19	7975825	Review letter to landlord, sign and transmit the same (.3).	Aspis, Norman	0.3	121.50	61,653.60	WO HD TR_____
09/29/19	7971289	Advise Receiver regarding further revision to restaurant services contract, issues with termination of leases and removal of inventory/equipment, communications with landlords, and issues with termination of ANI in-house counsel.	Fates, Edward (Ted)	1.6	950.40	62,604.00	WO HD TR_____
09/30/19	7972127	Work on letters regarding termination of service contracts (.4); work on amendment to Hines-Intersect lease (.3); analyze letter from HOA for residential property (.2); discuss issues and strategy regarding Valle Vista property with Receiver (.2); advise L. Ryan on issues relating to return of event deposits for restaurants (.2); conf. call/emails to address issues regarding termination of ANI in-house counsel and transition of matters (1.2); advise Receiver on issues relating to	Fates, Edward (Ted)	3.8	2,257.20	64,861.20	WO HD TR_____

Trans Date	Index	Description of Service Rendered	Timekeeper	Hours	Fees	Sum	Circle	Action
		potential sale terms and negotiations regarding ANI interest in Pullman development project (.2); analyze and revise termination and transition agreement with Casa Del Zorro (1.1).						
09/30/19	7973196	Review issues related to Amendment to Hines Intersect Lease for The Patio.	Lorenzen, Jonathan	0.3	156.60	65,017.80	WO HD	TR_____
09/30/19	7973850	Draft letters to terminate certain service contracts and confer with counsel regarding the same (.9).	Aspis, Norman	0.9	364.50	65,382.30	WO HD	TR_____
10/01/19	7976769	Communications with ANI in-house counsel regarding Patio 101 lease termination and FF&E (.4); analyze agreements/communications regarding Patio 101 and discuss same with Receiver (.4); communications with Receiver regarding CDZ termination agreement (.2); address issues and response to Fireside restaurant landlord (.1); communications with G. Rodriguez regarding HOA issues for residential property, work on letter to HOA (.4); call with Receiver and counsel for landlord for Pation 101 premises (.4); communications with Receiver and ANI in-house counsel regarding independent contractor agreement (.3); revisions to letter regarding termination of severance payments to former employee (.3).	Fates, Edward (Ted)	2.5	1,485.00	66,867.30	WO HD	TR_____
10/01/19	7977628	Revise Lease Amendment for The Patio at Intersect.	Lorenzen, Jonathan	1.2	626.40	67,493.70	WO HD	TR_____

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10/02/19	7981223	Conferences/work on strategy for the sale of real/personal property, omnibus motion re sale procedures (.5).	Zaro, David	0.5	393.75	67,887.45	WO HD TR_____
10/02/19	7978041	Discuss revisions to CDZ termination agreement with Receiver (.4); work on same (.5); communications with counsel for Owner of CDZ regarding same (.3); work on revisions to lease amendment for Hines-Intersect space (.3); advise G. Rodriguez on issues relating to escrow company for Thomas and Lamont sales (.4); advise Receiver on issues regarding transition of in-house counsel to part-time status (.2); communications with in-house counsel regarding same (.2); analyze information from in-house counsel regarding employee D&O claims (.2); conference call with Receiver, ANI in-house counsel, and outside IP counsel regarding trademark issues and strategy (.9).	Fates, Edward (Ted)	3.2	1,900.80	69,788.25	WO HD TR_____
10/02/19	7978141	Revise Amendment to Lease for The Patio at Hines Intersect; review escrow issues for 1617 Thomas.	Lorenzen, Jonathan	1.4	730.80	70,519.05	WO HD TR_____
10/03/19	8012179	Emails concerning the lease terminations, FF&E (.8).	Zaro, David	0.8	630.00	71,149.05	WO HD TR_____
10/03/19	7979802	Advise G. Rodriguez on procedures for court approval of real property sales.	Fates, Edward (Ted)	0.3	178.20	71,327.25	WO HD TR_____
10/03/19	7979166	Review terms of PSA for Keller property; discuss issues; prepare Amendment to PSA.	Lorenzen, Jonathan	1.2	626.40	71,953.65	WO HD TR_____

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10/04/19	7979902	Discuss amendment to Cohn agreement with Receiver (.3); revisions to same (.1); discuss motion for approval of sale of Lamont Street property with Receiver and G. Rodriguez (.3); initial work on same (.4); advise Receiver on strategy regarding FF&E sales and negotiations with landlords regarding same (.2); communications with ANI in-house counsel regarding transition to part-time and related employment issues (.3); initial work on termination letter regarding Cultivate vendor contract (.2); communications with Receiver and ANI outside trademark counsel regarding issue with landlord (.4); discuss employee issue regarding COBRA coverage with ANI in-house counsel (.2); calls with Receiver and lender regarding status of insurance of receivership property (.4); call with Receiver and outside PR consultant regarding media inquiries (.4).	Fates, Edward (Ted)	3.2	1,900.80	73,854.45	WO HD TR_____
10/04/19	7980910	Prepare Amendment to Management Agreement for restaurants.	Lorenzen, Jonathan	0.9	469.80	74,324.25	WO HD TR_____
10/05/19	7981446	Work with the Receiver, emails to assess lease and lender issues as to operating assets, conference with Receiver as to issues concerning FF&E, the properties.	Zaro, David	1.3	1,023.75	75,348.00	WO HD TR_____
10/05/19	7981451	Call with Receiver related to asset sales of personal property/FF&E.	Zaro, David	0.4	315.00	75,663.00	WO HD TR_____

Trans Date	Index	Description of Service Rendered	Timekeeper	Hours	Fees	Sum	Circle Action
10/07/19	8012182	Analysis of issues concerning the Pullman project in Santa Rosa, call/email with counsel to advise as to strategy, Receiver authority/terms (.5).	Zaro, David	0.5	393.75	76,056.75	WO HD TR_____
10/07/19	7980862	Follow up communications with counsel for Champion-Cain and Receiver regarding unemployment claim (.4); discuss sale of membership interest in Pullman project with Receiver (.4); initial work on purchase agreement (.8); call with in-house counsel and outside benefits advisor regarding employee COBRA issues (.3); discuss same with Receiver (.1); call with ANI outside trademark counsel regarding infringement and trademark protection concerns (.3); advise Receiver regarding same (.3); discuss certificates of authority needed for assets held in trust with Receiver (.3); communications with counsel for Champion-Cain regarding same (.2).	Fates, Edward (Ted)	3.1	1,841.40	77,898.15	WO HD TR_____
10/07/19	7981262	Review PSA documents for Keller property; continue preparing Amendment to PSA; correspond regarding issues.	Lorenzen, Jonathan	2.2	1,148.40	79,046.55	WO HD TR_____
10/07/19	8012148	Review, sign, and transmit certain termination notice letters (.3); correspondence regarding termination notice letters (.2).	Aspis, Norman	0.5	202.50	79,249.05	WO HD TR_____
10/08/19	7985359	Commence review of Pullman Lofts documents.	Hall, Debra	1.0	715.50	79,964.55	WO HD TR_____



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10/08/19	7982055	Analyze issues regarding transfer of equipment/trademarks to A. Davis, release of claims regarding same (.4); discuss same with Receiver (.4); work on agreement regarding same (1.6); communications with ANI in-house counsel and insurance broker (.1); communications with counsel for landlord regarding lease termination issues (.3); work on motion for approval of sale of Lamont Street property (1.9); communications with Receiver and G. Rodriguez regarding same (.4); address issues regarding lease amendment for Hines-Intersect and amendment to PSA for Keller Street property (.3); discuss potential sale of membership interest in Pullman project with Receiver (.2); initial work on purchase agreement regarding same (.3).	Fates, Edward (Ted)	5.9	3,504.60	83,469.15	WO HD TR_____
10/08/19	7983008	Review terms of PSAs.	Lorenzen, Jonathan	0.4	208.80	83,677.95	WO HD TR_____
10/08/19	7983369	Confer with counsel regarding notice of termination letters (.2).	Aspis, Norman	0.2	81.00	83,758.95	WO HD TR_____
10/09/19	7991030	Review operating agreement and draft Assignment of Partnership Interest and Wavier of Right of First Refusal and Consent to Substitution of Member (Exhibits to Membership Interest Purchase and Sale Agreement).	Hall, Debra	1.8	1,287.90	85,046.85	WO HD TR_____
10/09/19	7983393	Advise Receiver regarding strategy on multiple trademark issues raised by ANI outside trademark counsel (.4); communications with Receiver	Fates, Edward (Ted)	3.8	2,257.20	87,304.05	WO HD TR_____

Trans Date	Index	Description of Service Rendered	Timekeeper	Hours	Fees	Sum	Circle	Action
		regarding terms of potential Pullman sale and documentation needed for same (.3); discuss plan for seeking authority to engage auctioneer and liquor license broker with Receiver (.3); advise G. Rodriguez on strategy for issues raised by Thomas Street buyer (.2); communications with Receiver and counsel for Hines regarding amendment to lease (.4); review trust agreement documents for real properties held in trust (.4); initial work on certificates of authority over trust assets (.8); advise Receiver and G. Rodriguez on strategy regarding brokers and offers for restaurant properties (.3); advise Receiver regarding restaurant gift card issues (.2); advise Receiver on building wrap/winterization for 301 D Street project (.2); advise Receiver on issues relating Cultivate inventory of products and potential sale of same (.3).						
10/09/19	8009741	Draft letters to Nations Direct and Sky, Inc. (.8).	Aspis, Norman	0.8	324.00	87,628.05	WO	HD TR_____
10/09/19	7985380	Telephone conference regarding certification of trust and certificate of authority(.2); review trust agreements (.3); research regarding statutory requirements for certification of trust (.4); draft certification of trust for The Gina Champion-Cane Revocable Trust Agreement (.5); draft certificate of authority for The Gina Champion-Cain Revocable Trust Agreement (.4)	Fisher, Wade	1.8	494.10	88,122.15	WO	HD TR_____

Trans Date	Index	Description of Service Rendered	Timekeeper	Hours	Fees	Sum	Circle Action
10/10/19	7989028	Review and forward message from real estate broker interested in receivership properties.	Kaup, John	0.2	58.50	88,180.65	WO HD TR_____
10/10/19	7985854	Work on declaration of trust and certificate of authority for sale of Thomas Street property (.8); discuss same with G. Rodriguez (.2); address issues regarding purchase and sale agreement for Pullman membership interest (.7); review comments to asset transfer and release agreement from ANI outside trademark counsel and discuss same with Receiver (.4); revisions to same (.2); address correspondence from counsel for landlord for Patio Marketplace regarding transfer of liquor license pursuant to lease, discuss same with Receiver (.3); discuss changes to Lamont Street sale motion with Receiver (.2); work on same (.6).	Fates, Edward (Ted)	3.4	2,019.60	90,200.25	WO HD TR_____
10/10/19	7985870	Review information from title and escrow related to Keller property; revise Amendment to PSA for Keller.	Lorenzen, Jonathan	1.1	574.20	90,774.45	WO HD TR_____
10/10/19	7987097	Revise certificate of trust for Gina Champion-Cain Revocable Trust (.4); revise certificate of authority for Gina Champion Cain Revocable Trust (.8); assemble exhibit to certificate of trust (.2); draft certificate of trust and certificate of authority for Cain Family Trust (.6); draft certificate of trust and certificate of authority for Himmelberg and Cain Living Trust (.6)	Fisher, Wade	2.6	713.70	91,488.15	WO HD TR_____

Trans Date	Index	Description of Service Rendered	Timekeeper	Hours	Fees	Sum	Circle Action
10/11/19	7989081	Review of message regarding raising rental dates and initial review of legislation regarding required notice.	Kaup, John	0.2	58.50	91,546.65	WO HD TR_____
10/11/19	7991044	Continue working on Membership Interest Purchase and Sale Agreement.	Hall, Debra	2.8	2,003.40	93,550.05	WO HD TR_____
10/11/19	7987425	Work on declaration in support of Lamont Street sale motion (.9); discuss same with Receiver (.3); work on proposed order and notice of motion (.4); communications with L. Ryan regarding property tax issues (.2); communications with court chambers regarding hearing date/time for sale motion (.2); address issues regarding amendment to Thomas Street purchase and sale agreement (.3); communications with A, Herren regarding termination for Cultivate independent contractor (.1); address final revisions and execution of asset transfer and release agreement for A. Davis (.3); discuss new lease for residential property and notice issues regarding raising rents at other rental properties with G. Rodriguez (.4); revisions to purchase and sale agreement for Pullman membership interest (.8).	Fates, Edward (Ted)	3.9	2,316.60	95,866.65	WO HD TR_____
10/11/19	7987668	Review PSA issues with Receiver; complete Second Amendment to PSA for Petaluma property; review and revise First Amendment to PSA for Thomas Street property.	Lorenzen, Jonathan	2.2	1,148.40	97,015.05	WO HD TR_____

Trans Date	Index	Description of Service Rendered	Timekeeper	Hours	Fees	Sum	Circle Action
10/14/19	7990331	Review and analysis of recent Tenant Protection legislation and noticing requirements for rate increases.	Kaup, John	0.6	175.50	97,190.55	WO HD TR_____
10/14/19	7989369	Call for additional information regarding Pullman Lofts II. (.1) Review additional entity documentation. (.4) Revise purchase and sale agreement to include Pullman Lofts II interest, and email to Krista Freitag. (1.4)	Hall, Debra	1.9	1,359.45	98,550.00	WO HD TR_____
10/14/19	7988458	Advise Receiver on strategy and responses to certain lender inquiries (.3); discuss strategy regarding FF&E and improvements at Goldfinch restaurant with Receiver (.2); analyze issues regarding Pullman Phase II interests and purchase and sale agreement, discuss same with Receiver (.8); advise G. Rodriguez on issues relating to lease terminations and rent increases for residential properties (.4); respond to inquiry from counsel for City of West Sacramento regarding 301 D Street (.2); address issues regarding lease for residential property, discuss same with G. Rodriguez (.3); revisions to engagement letter for trademark counsel (.6).	Fates, Edward (Ted)	2.8	1,663.20	100,213.20	WO HD TR_____
10/14/19	7989173	Review issues with leasing for property.	Lorenzen, Jonathan	0.8	417.60	100,630.80	WO HD TR_____
10/15/19	7992323	Emails concerning the Pullman transaction and evidence to support the transaction/timing issues (.4). Follow-up on the West Sacramento	Zaro, David	0.7	551.25	101,182.05	WO HD TR_____

Trans Date	Index	Description of Service Rendered	Timekeeper	Hours	Fees	Sum	Circle Action
		project, emails re City issues, follow-up with counsel (.3).					
10/15/19	7989754	Communications with counsel for Goldfinch landlord regarding appraisal of FF&E at premises (.2); work on addendum to residential purchase agreement and discuss same with G. Rodriguez (1.2); communications with counsel for Patio 101 landlord regarding FF&E and liquor license (.3); discuss same with Receiver (.3); respond to inquiries from CalPrivate Bank regarding Lamont Street sale motion (.4); analyze further edits to draft lease amendment from counsel for Hines (.2); advise Receiver on issues relating to SR Mission Beach lease (.3).	Fates, Edward (Ted)	2.9	1,722.60	102,904.65	WO HD TR_____
10/15/19	7989705	Review proposed form of Residential Lease for 3415 Mission; prepare Addendum to Residential Lease; review comments to Amendment for The Patio Lease at Hines Intersect.	Lorenzen, Jonathan	3.8	1,983.60	104,888.25	WO HD TR_____
10/16/19	7990829	Advise Receiver regarding strategy for potential assignment of Goldfinch lease and sale of FF&E (.2); discuss status and next steps on Thomas Street and Keller Street sales, title issues, contingencies, and motion for approval with G. Rodriguez (.4).	Fates, Edward (Ted)	0.6	356.40	105,244.65	WO HD TR_____
10/17/19	7991884	Discuss next steps on Hines lease amendment with Receiver, revisions to draft correspondence regarding same (.7); work on motion for	Fates, Edward (Ted)	3.8	2,257.20	107,501.85	WO HD TR_____

Trans Date	Index	Description of Service Rendered	Timekeeper	Hours	Fees	Sum	Circle	Action
		approval of sale of Thomas Ave property (1.6); work on termination of service contract with Biomed-Athena (.2); analyze issues with 4364 Valle Vista property and related trust, discuss same with Receiver (.7); conference call with Receiver and Hines to discuss lease amendment and revisions to same (.5); advise Receiver on issues with liquor vendor for restaurants (.1).						
10/17/19	7992571	Review lease issues for properties.	Lorenzen, Jonathan	0.8	417.60	107,919.45	WO	HD TR_____
10/18/19	7994835	Conference/meeting with the Receiver and counsel to address discovery/operating issues; Strategy as to creditors pending the ruling on the turnover motion and landlord issues (.9).	Zaro, David	0.9	708.75	108,628.20	WO	HD TR_____
10/18/19	7993203	Advise Receiver on issues with transfer of liquor license per terms of lease (.2); advise Receiver on approach to Goldfinch property and potential asset sale (.3); communications with J. Lance regarding San Rafael properties (.1); discuss correspondence from lender and response to same with Receiver (.2); discuss revisions to lease amendment with Hines with Receiver (.3); communications with counsel for Patio 101 landlord re FF&E at premises (.4); analyze response from J. Hanson regarding termination of lease (.1).	Fates, Edward (Ted)	1.6	950.40	109,578.60	WO	HD TR_____
10/18/19	7993169	Review leasing issues; discuss with	Lorenzen, Jonathan	0.9	469.80	110,048.40	WO	HD TR_____

Trans Date	Index	Description of Service Rendered	Timekeeper	Hours	Fees	Sum	Circle Action
		Landlord's counsel.					
10/21/19	7994750	Advise Receiver on issues relating to termination of J. Hanson lease agreement (.2); revise correspondence regarding same (.2); initial work on amendment to J. Hanson lease (.3); call with counsel for Hines regarding changes to lease amendment and execution of same (.4); communications with Receiver regarding execution (.2); discuss strategy regarding continuing cash crisis and operations with Receiver (.3).	Fates, Edward (Ted)	1.6	950.40	110,998.80	WO HD TR_____
10/21/19	7995410	Review and respond to issues regarding leases.	Lorenzen, Jonathan	1.6	835.20	111,834.00	WO HD TR_____
10/22/19	7997886	Emails with Krista Freitag regarding whether JB Resources had been admitted to Pullman entity. Review entity documents. Remove JB Resources as signatory.	Hall, Debra	0.5	357.75	112,191.75	WO HD TR_____
10/22/19	7995846	Discuss issues and strategy for engagement of licensed auctioneer(s); and sales of personal property with Receiver (.5); initial work on motion regarding same (.3); discuss cash flow issues and strategy regarding same with Receiver (.4); address issues regarding terms of purchase and sale agreement for membership interest in Pullman Lofts project, discuss same with Receiver (.6); communications with counsel for landlord for Pation 101 space regarding personal property (.1);	Fates, Edward (Ted)	2.3	1,366.20	113,557.95	WO HD TR_____



Trans Date	Index	Description of Service Rendered	Timekeeper	Hours	Fees	Sum	Circle	Action
		analyze issues and advise Receiver regarding termination of Patio Marketplace at Aventine location (.4).						
10/22/19	7995795	Review and revise amendments for various leases of properties included in receivership; review and respond to related correspondence.	Lorenzen, Jonathan	1.8	939.60	114,497.55	WO	HD TR_____
10/23/19	8000008	Conference with the Receiver concerning the real property sale process, personal property sale process.	Zaro, David	0.3	236.25	114,733.80	WO	HD TR_____
10/23/19	8012197	Analysis of the issues re Pullman Lofts, the sale of equity interests/assess motion and evidence to serve as foundation and call with Receiver (.7). Call related to Pullman Lofts property (.2).	Zaro, David	0.9	708.75	115,442.55	WO	HD TR_____
10/23/19	7997565	Call with counsel for former Patio 101 landlord regarding FF&E and liquor license for premises and potential sale of same (.4); analyze issues with Pullman purchase and sale agreement, and discuss strategy regarding same with Receiver (.5); revisions to correspondence with Pullman purchaser (.2); advise Receiver on employee injury and pay issues (.4).	Fates, Edward (Ted)	1.5	891.00	116,333.55	WO	HD TR_____
10/24/19	8001558	Call with Receiver/counsel related to the personal property auction guidelines, follow-up as to motion (.3).	Zaro, David	0.3	236.25	116,569.80	WO	HD TR_____
10/24/19	7998441	Discuss strategy and next steps for Thomas Street sale and Keller Street sale with G. Rodriguez (.6);	Fates, Edward (Ted)	2.9	1,722.60	118,292.40	WO	HD TR_____

Trans Date	Index	Description of Service Rendered	Timekeeper	Hours	Fees	Sum	Circle	Action
		communications with Receiver and counsel for Patio 101 landlord regarding potential sale of FF&E and liquor license (.3); discuss life insurance policies on employees and possible assignment of same with Receiver, review insurance documents regarding same (.6); communications with G. Rodriguez and contractor for Keller Street property regarding mechanic's lien issues (.6); discuss same with Receiver (.2); advise Receiver regarding execution of lease amendment with J. Hanson (.2); initial work on motion for approval of Keller Street sale (.4).						
10/25/19	8000338	Work on Keller Street sale motion (2.7); discuss same with G. Rodriguez (.4); discuss issues regarding contractor lien on Keller Street with Receiver (.4); advise Receiver on next steps regarding Pullman (.2).	Fates, Edward (Ted)	3.7	2,197.80	120,490.20	WO HD	TR_____
10/28/19	8012207	Call with Receiver concerning the ANI properties, the auction of FF&E (.3).	Zaro, David	0.3	236.25	120,726.45	WO HD	TR_____
10/28/19	8002550	Call with Bob Edmunds. (.4) Commence revising agreement to address Mr. Edmunds' comments. (.4).	Hall, Debra	0.8	572.40	121,298.85	WO HD	TR_____
10/28/19	8001396	Advise Receiver on issues relating to sale of golf cart located at Rancho Mirage property (.3); work on motion for authority to engage auctioneer and sell personal property (1.1).	Fates, Edward (Ted)	1.4	831.60	122,130.45	WO HD	TR_____

Trans Date	Index	Description of Service Rendered	Timekeeper	Hours	Fees	Sum	Circle	Action
10/29/19	8004291	Analysis of issues and call with Receiver related to real estate restaurant sales and broker's retention/strategy (.4).	Zaro, David	0.4	315.00	122,445.45	WO HD	TR_____
10/29/19	8002805	Advise on terms/revisions to Pullman purchase and sale agreement (.3); discuss strategy regarding engagement of broker for restaurants and preparation of form PSA with Receiver (.4); call with Keller Street contractor regarding mechanic's lien (.4); update Receiver regarding same (.2); revisions to Keller Street sale motion (1.6); address issues regarding assignment of Keller Street PSA to buyer's entity; (.4) analyze issues regarding termination of property management contract and former employee leases, discuss same with Receiver (.6); advise Receiver on next steps regarding A. Davis (.1).	Fates, Edward (Ted)	3.9	2,316.60	124,762.05	WO HD	TR_____
10/29/19	8002985	Analyze structure for disposition of restaurant assets and related property (0.9); prepare Assignment of PSA for Keller Street property (0.9).	Lorenzen, Jonathan	1.8	939.60	125,701.65	WO HD	TR_____
10/29/19	8006817	Telephone conference re: form of purchase agreement for restaurants (.5); Analysis of assets/real estate to be sold under agreement (.6)	Klinger, Warren	1.1	519.75	126,221.40	WO HD	TR_____
10/30/19	8006901	Call with counsel, assess the legal issues relate to recovery from the Keller/Petaluma property sale, lender issues (.4).	Zaro, David	0.4	315.00	126,536.40	WO HD	TR_____

Trans Date	Index	Description of Service Rendered	Timekeeper	Hours	Fees	Sum	Circle Action
10/30/19	8008736	Review Waiver of Right of First Refusal & Consent to Substitution of Member drafted by purchaser's counsel.	Hall, Debra	0.4	286.20	126,822.60	WO HD TR_____
10/30/19	8004424	Advise Receiver regarding potential sale of 301 D Street and negotiations with contractor (.3); revise and finalize Keller Street sale motion (.4); work on Receiver's declaration regarding same (.7); advise G. Rodriguez regarding title issues for Thomas Avenue sale (.4); analysis of settlement offer from J. Lance, discuss same with Receiver (.4).	Fates, Edward (Ted)	2.2	1,306.80	128,129.40	WO HD TR_____
10/31/19	8008531	Call with Bob Edmunds. (.3) Confer regarding anticipated court schedule. (.2) Call to Bob Edmunds regarding same. (.2) Revise purchase and sale agreement to address Mr. Edmund's comments. (.9)	Hall, Debra	1.6	1,144.80	129,274.20	WO HD TR_____
10/31/19	8005389	Work on Thomas Avenue sale motion (1.6); advise on issues relating to draft Pullman purchase agreement (.3); call with counsel for buyer of Pullman interest re: same and timeline for court approval (.4); discuss contract terms with PR consultant with Receiver (.3); call with court chambers re: hearing date for Keller Street sale motion (.1); finalize motion, notice, and proposed order (.4); analyze letter from American National Insurance re: loans, security interests and prepayment penalties (.4); advise on terms of asset	Fates, Edward (Ted)	3.9	2,316.60	131,590.80	WO HD TR_____

Trans Date	Index	Description of Service Rendered	Timekeeper	Hours	Fees	Sum	Circle	Action
		purchase agreement and strategy for same (.4).						
10/31/19	8006347	Review asset purchase agreements and land purchase agreements in connection with preparing form agreement to use for the sale of restaurant properties.	Lorenzen, Jonathan	1.8	939.60	132,530.40	WO HD	TR_____
10/31/19	8006845	Prepare initial draft of Purchase Agreement (1.9); Telephone conference re: structure of businesses and different ownership of real estate by restaurants (with some having leases and some owning fee title) (.3); revise draft purchase agreement (.5).	Klinger, Warren	2.7	1,275.75	133,806.15	WO HD	TR_____
11/01/19	8012080	Work on/analysis of the sale/marketing proposals from brokers related to restaurant properties (.4). Call with Receiver related to the sale issues related to Keller and broker issues (.4).	Zaro, David	0.8	630.00	134,436.15	WO HD	TR_____
11/01/19	8013813	Review buyer's counsel's additional comments to purchase and sale agreement. (.3) Confer regarding release of claims against the entity. (.2) Revise draft agreement to address comments. (.5) Call with buyer's counsel regarding release of claims. (.2)	Hall, Debra	1.2	858.60	135,294.75	WO HD	TR_____
11/01/19	8010486	Analyze offer from Patio 101 landlord regarding purchase of FF&E and liquor license, communications with Receiver and counsel for landlord regarding same (.8); analyze issues	Fates, Edward (Ted)	4.7	2,791.80	138,086.55	WO HD	TR_____

Trans Date	Index	Description of Service Rendered	Timekeeper	Hours	Fees	Sum	Circle Action
		regarding release of claims against Pullman entity, discuss same with Receiver (.6); revisions to Thomas Street sale motion (.8); analyze issues regarding prepayment penalty on Axos loan and discuss with Receiver (.7); discuss strategy for motion to engage auctioneer and liquor license broker with Receiver (.2); work on motion (1.6).					
11/04/19	8013852	Review purchaser's proposed language regarding release of claims. (.3) Minor revisions to draft purchase and sale agreement to reflect buyer information. (.1)	Hall, Debra	0.4	286.20	138,372.75	WO HD TR_____
11/04/19	8010595	Finalize Thomas Avenue sale motion (.3); work on declaration regarding same (.7); discuss same with Receiver (.2); work on notice of motion and proposed order (.3); revisions to proposed release language for Pullman Lofts agreement, discuss same with Receiver (.3); discuss issues with 301 D Street contractor, letter of intent, and subcontractor mechanic's lien with Receiver (.6); initial work on asset purchase agreement for Patio 101 liquor license and equipment (.4).	Fates, Edward (Ted)	2.8	1,663.20	140,035.95	WO HD TR_____
11/04/19	8011026	Review terms of sale of leased properties.	Lorenzen, Jonathan	0.4	208.80	140,244.75	WO HD TR_____
11/04/19	8011862	Prepare Form Asset Purchase Agreement that includes the sale of real property (1.8); Prepare Form Asset Purchase Agreement that	Klinger, Warren	5.0	2,362.50	142,607.25	WO HD TR_____

Trans Date	Index	Description of Service Rendered	Timekeeper	Hours	Fees	Sum	Circle	Action
		includes the assignment/termination of leasehold interests/right (1.8); Prepare specific asset purchase agreement for purchase of (I) fixtures, furniture and equipment and (II) liquor license, in consideration of cash and waiver of any owed back rent (1.4).						
11/05/19	8013386	Analysis of issues related to the restaurant operations, the leases- FF&E and call with Receiver (.7). Work with Receiver and counsel related to the sale of assets, leases (.4).	Zaro, David	1.1	866.25	143,473.50	WO HD	TR_____
11/05/19	8013828	Revise agreement to include limited release by selling entities.	Hall, Debra	0.4	286.20	143,759.70	WO HD	TR_____
11/05/19	8011364	Work on letter to 301 D Street subcontractor regarding mechanic's lien (.7); discuss confidentiality agreement for 301 D Street with Receiver (.2); advise Receiver regarding lease termination issues for Hines-Intersect location and termination of management contract for Fox Plaza location (.7).	Fates, Edward (Ted)	1.6	950.40	144,710.10	WO HD	TR_____
11/05/19	8012585	Review draft form PSA agreements.	Lorenzen, Jonathan	0.2	104.40	144,814.50	WO HD	TR_____
11/05/19	8012951	Revise form asset purchase agreement to conform to business as restaurants (1.3); Revise landlord asset purchase agreement (1.8).	Klinger, Warren	3.1	1,464.75	146,279.25	WO HD	TR_____
11/06/19	8026706	Consider scope of release and revise purchase and sale agreement and member's consent and waiver to reflect expanded release.	Hall, Debra	0.6	429.30	146,708.55	WO HD	TR_____

Trans Date	Index	Description of Service Rendered	Timekeeper	Hours	Fees	Sum	Circle Action
11/06/19	8012790	Communications with Receiver and counsel for J. McGrory re: potential dissolution of certain Pullman-related entities (.4) advise Receiver re: lease termination notices (.2) work on motion re: engagement of auctioneer and liquor license broker, sales of personal property (1.6) advise on revisions to release language for Pullman Lofts agreement (.4) analyze legal issues re: liens recorded post-receivership (.6) advise G. Rodriguez on response to lease proposal from investor/former employee, revisions to draft response (.4)	Fates, Edward (Ted)	3.6	2,138.40	148,846.95	WO HD TR_____
11/06/19	8013936	Review draft PSA forms for disposition of various properties, and confer internally regarding issues.	Lorenzen, Jonathan	1.4	730.80	149,577.75	WO HD TR_____
11/07/19	8026705	Revise release to incorporate Receiver's response to purchaser's request. Email to purchaser's counsel regarding same.	Hall, Debra	0.5	357.75	149,935.50	WO HD TR_____
11/07/19	8015083	Advise Receiver on issues relating to potential sale of Cultivate product (.4) revisions to letter to subcontractor re: mechanic's lien on 301 D Street, discuss same with Receiver (.4) communications with counsel for Patio 101 landlord (.1) work on asset purchase agreement with Patio 101 landlord (.5) revisions to proposed listing agreement with Colliers for receivership properties (.8) discuss same with G. Rodriguez (.2)	Fates, Edward (Ted)	2.4	1,425.60	151,361.10	WO HD TR_____



Trans Date	Index	Description of Service Rendered	Timekeeper	Hours	Fees	Sum	Circle Action
11/07/19	8014894	Review terms of proposed Purchase and Sale Agreement for Patio 101 property, and confer regarding the same (0.9); review and revise form of Purchase and Sale Agreement for Patio 101 (1.6); prepare First Amendment to Lease for Patio 101 Lease (1.4)	Lorenzen, Jonathan	3.9	2,035.80	153,396.90	WO HD TR_____
11/07/19	8016349	Revise Patio 101 Asset Purchase Agreement based on form PSA for other entities (3.3); Conference re: access to premises if sale is not approved (.5); Revise Patio 101 Asset Purchase Agreement re: liquor license (.9)	Klinger, Warren	4.7	2,220.75	155,617.65	WO HD TR_____
11/08/19	8016175	Call/emails with counsel for Axos Bank regarding request for conflict waiver relating to prior work for ANI (.5); discuss same with Receiver (.2); analyze issues regarding asset purchase agreement and lease amendment for Patio 101 (.7); discuss same with Receiver (.3).	Fates, Edward (Ted)	1.7	1,009.80	156,627.45	WO HD TR_____
11/08/19	8016477	Revise Purchase and Sale Agreement for 101 Patio, and confer regarding issues related to 101 Patio.	Lorenzen, Jonathan	3.1	1,618.20	158,245.65	WO HD TR_____
11/08/19	8016955	Revise Patio 101 PSA (1.2); Confer re: right to re-entry and granting of immediate possession prior to court approval (.7); Analysis of timing of liquor license transfer and incorporating this analysis into agreement (.9).	Klinger, Warren	2.8	1,323.00	159,568.65	WO HD TR_____
11/11/19	8090528	Emails with landlord, lender and	Zaro, David	0.6	472.50	160,041.15	WO HD TR_____

Trans Date	Index	Description of Service Rendered	Timekeeper	Hours	Fees	Sum	Circle Action
		Receiver concerning the sale of inventory/licenses .					
11/11/19	8017653	Revisions to draft listing agreements for real estate brokers, discuss same with G. Rodriguez (.7); revisions to Patio 101 lease amendment (.6); discuss same with Receiver (.2); discuss process for disposition of Valle Vista property via amendment to Trust Agreement with Receiver, prepare summary memo regarding same (.8); discuss draft purchase and sale agreement for Patio 101 with Receiver (.3); revisions to same (.2).	Fates, Edward (Ted)	2.8	1,663.20	161,704.35	WO HD TR_____
11/11/19	8017683	Review documents related to Patio 101 Lease and complete preparation of Amendment to Lease to provide for early termination and removal of property.	Lorenzen, Jonathan	1.9	991.80	162,696.15	WO HD TR_____
11/11/19	8021467	Revise PSA to incorporate assignment of lease.	Klinger, Warren	0.3	141.75	162,837.90	WO HD TR_____
11/12/19	8024012	Email with lender related to the FF&E sale, SBA loan and advice to Receiver.	Zaro, David	0.4	315.00	163,152.90	WO HD TR_____
11/12/19	8021098	Communications with Receiver and ANI outside IP counsel regarding trademark issues relating Swell Coffee (.4); discuss mechanic's lien issue and proposed sale approval order for 132 Keller Street with G. Rodriguez (.2); advise L. Ryan as to issues with law firm invoices (.2); communications with counsel for subcontractor on 301 D street (.2);	Fates, Edward (Ted)	2.1	1,247.40	164,400.30	WO HD TR_____

Trans Date	Index	Description of Service Rendered	Timekeeper	Hours	Fees	Sum	Circle	Action
		communications with Receiver and counsel for Axos regarding conflict issue (.2); discuss lease termination for Diamond Street property and termination of property management contract with Receiver (.4); initial work on same (.2); advise Receiver regarding CDZ mailing list issue and Lamont Street overbid issue (.3).						
11/13/19	8026689	Review changes requested by purchaser and other member of Pullman to release. Email to Receiver regarding same.	Hall, Debra	0.4	286.20	164,686.50	WO HD	TR_____
11/13/19	8022685	Communications with Receiver regarding escrow and terms for Patio 101 transaction and sale process for other restaurant assets (.8); advise Receiver on employee and HR issues (.3); communications with counsel for Patio 101 landlord (.2); advise on revisions to release language for Pullman Lofts asset purchase agreement (.3); analyze and advise Receiver on employee benefits issues (.4).	Fates, Edward (Ted)	2.0	1,188.00	165,874.50	WO HD	TR_____
11/13/19	8023059	Strategize regarding independent contractor issues.	Bell, Melissa	0.2	81.00	165,955.50	WO HD	TR_____
11/13/19	8023312	TC with Krista Freitag re. IRS audit of ANI. [0.6 hr.] Prepare documentation re. IRS audit. [1 hr.]	Kraus, Katherine	1.6	1,044.00	166,999.50	WO HD	TR_____
11/14/19	8024267	Analyze correspondence from counsel for SFG regarding 132 Keller St. sale and release price issue (.3); advise Receiver regarding same (.2);	Fates, Edward (Ted)	0.9	534.60	167,534.10	WO HD	TR_____

Trans Date	Index	Description of Service Rendered	Timekeeper	Hours	Fees	Sum	Circle	Action
		revision to broker listing agreement for 140 Keller Street, discuss same with G. Rodriguez (.4).						
11/15/19	8027941	Analysis of process of sale of real/personal property, recommendations as to references and strategy to expedite.	Zaro, David	0.4	315.00	167,849.10	WO HD	TR_____
11/15/19	8024814	Communications with Receiver and counsel for landlord regarding termination of The Patio Marketplace contract (.4); revisions to letters regarding termination of lease for residential property and termination of property management contract (.4); advise on form purchase and sale documents for restaurant sales (.3); discuss issues and analysis of Pullman deal terms with Receiver (.4); confer with SEC counsel regarding issues relating to referral of sale motions to Magistrate Judge (.2); advise Receiver regarding same (.1); advise Receiver on issues relating to hostile former employee (.4); advise Receiver regarding issues relating to Cultivate product and T. Edwards (.2); revisions to lease amendment for Patio 101, communications with counsel for landlord re same and purchase and sale agreement (.4).	Fates, Edward (Ted)	2.8	1,663.20	169,512.30	WO HD	TR_____
11/15/19	8024719	Review comments to form Purchase and Sale Agreements from Receiver and liquor license counsel, and confer regarding the same.	Lorenzen, Jonathan	1.1	574.20	170,086.50	WO HD	TR_____
11/15/19	8025452	Revise base form documents to	Klinger, Warren	3.2	1,512.00	171,598.50	WO HD	TR_____

Trans Date	Index	Description of Service Rendered	Timekeeper	Hours	Fees	Sum	Circle Action
		create separate forms for restaurants selling real estate and restaurants assigning leases (2.0); revise purchase and sale agreements based on client and liquor license counsel comments, specifically focusing on timing of liquor license transfer approval and court approval dates (1.2).					
11/18/19	8030255	Revise release to add additional language requested by Buyer and approved by Receiver; email to buyer's counsel regarding same.	Hall, Debra	0.2	143.10	171,741.60	WO HD TR_____
11/18/19	8027210	Discuss 11/18 hearing and potential for expedited sale process on certain properties with Receiver and G. Rodriguez.	Fates, Edward (Ted)	0.4	237.60	171,979.20	WO HD TR_____
11/18/19	8040004	Confer with counsel regarding The Fireside By The Patio space (.3).	Aspis, Norman	0.3	121.50	172,100.70	WO HD TR_____
11/19/19	8031963	Call with Receiver related to real estate marketing and appraisals (.4). Analysis of the issues related to UCC filings re Goldfinch FF&E, license and then call with counsel for landlord (.4). Calls with Receiver related to UCC lien/sale of FF&E (.3).	Zaro, David	1.1	866.25	172,966.95	WO HD TR_____
11/19/19	8028581	Communications with G. Rodriguez regarding motion to approve sale of Brighton Court property (.2); initial work on motion (.4).	Fates, Edward (Ted)	0.6	356.40	173,323.35	WO HD TR_____
11/19/19	8028845	Revise non-real estate sale purchase and sale agreement.	Klinger, Warren	0.9	425.25	173,748.60	WO HD TR_____
11/20/19	8029314	Revisions to letter to insurance carrier	Fates, Edward (Ted)	3.6	2,138.40	175,887.00	WO HD TR_____

Trans Date	Index	Description of Service Rendered	Timekeeper	Hours	Fees	Sum	Circle	Action
		regarding claims and information requested, communications with ANI in house counsel regarding same (.6); review PSA and lease amendment for Patio 101 executed by landlord and advise Receiver regarding same (.4); communications with counsel for Patio 101 landlord regarding same (.2); revisions to same (.3); discuss analysis of release price for 132 Keller Street with Receiver (.3); call/emails with counsel for SFG regarding same (.5); advise G. Rodriguez regarding issues relating to tenant at West Washington property (.3); communications with Receiver and counsel for landlord regarding termination of Patio Marketplace contract (.3); communications with Receiver and G. Rodriguez regarding status of Lamont Street sale motion (.1); prepare notice regarding no overbids and no opposition (.3); discuss letter to J&D Management with Receiver, revisions to same (.3).						
11/20/19	8029544	Review correspondence from Buyer for Patio 101, and related executed documents to confirm completion.	Lorenzen, Jonathan	0.9	469.80	176,356.80	WO	HD TR_____
11/20/19	8029950	Revise partially executed PSA to include contact and escrow information.	Klinger, Warren	0.9	425.25	176,782.05	WO	HD TR_____
11/21/19	8032930	Analysis of the filing/oppositions to sale motions, emails with counsel as to Receiver reply.	Zaro, David	0.4	315.00	177,097.05	WO	HD TR_____
11/21/19	8034115	Confer regarding timing issues	Hall, Debra	0.3	214.65	177,311.70	WO	HD TR_____

Trans Date	Index	Description of Service Rendered	Timekeeper	Hours	Fees	Sum	Circle	Action
		relating to purchase and sale agreement. Call from Bob Edmunds, counsel for purchaser, regarding timing issues.						
11/21/19	8030540	Work on motion for approval of Brighton Court property (1.7); discuss same with Receiver and G. Rodriguez (.4); discuss same with SEC counsel (.1); work on issues related to potential overbid for Brighton Court and addendum for Overbid PSA (.6); review late-filed opposition to Lamont Street sale motion from First Choice Bank (.3); advise Receiver regarding same (.1); assist in finalizing Paton 101 PSA and lease amendment for execution by Receiver (.2).	Fates, Edward (Ted)	3.4	2,019.60	179,331.30	WO HD	TR_____
11/21/19	8030087	Review and revise Purchase and Sale Agreements and status of Patio 101, and confer regarding the same.	Lorenzen, Jonathan	1.9	991.80	180,323.10	WO HD	TR_____
11/21/19	8030849	Revise and finalize PSA for receiver execution.	Klinger, Warren	1.1	519.75	180,842.85	WO HD	TR_____
11/22/19	8033293	Address several lender emails concerning the insurance coverage matters (SFG/First Choice) as well as loan payment defaults (SFG) and sale of collection/application of proceeds (First Choice)/SFG) (.7). Further review of UCC records and sale of FF&E (.4).	Zaro, David	1.1	866.25	181,709.10	WO HD	TR_____
11/22/19	8031157	Analyze issues regarding potential joint motion to approve sale of personal property and liquor license for Patio 101 (.3); confer with counsel	Fates, Edward (Ted)	3.1	1,841.40	183,550.50	WO HD	TR_____

Trans Date	Index	Description of Service Rendered	Timekeeper	Hours	Fees	Sum	Circle Action
		for SEC regarding same (.2); analyze issues raised in correspondence from counsel for SFG regarding release price for 132 Keller Street sale (.2); communications with Receiver and counsel for SFG regarding same (.4); prepare response to counsel for SFG regarding release price, maturity date extension, and related terms (.5); discuss potential sale of Patio on Goldfinch personal property and liquor license with Receiver (.3); initial work on form of PSA (.2); analyze opposition to 132 Keller Street sale motion from contractor ALC, including state court complaint (.4); advise Receiver regarding same (.3); initial work on reply to First Choice opposition to Lamont Street sale motion (.3).					
11/22/19	8032198	Review correspondence regarding Patio 101.	Lorenzen, Jonathan	0.1	52.20	183,602.70	WO HD TR_____
11/22/19	8031841	Prepare form of Landlord FFE and Liquor License Purchase and Sale Agreement.	Klinger, Warren	0.6	283.50	183,886.20	WO HD TR_____
11/23/19	8033514	Analysis of Lewis opposition to the sale of the Keller property, follow-up email (.8).	Zaro, David	0.8	630.00	184,516.20	WO HD TR_____
11/25/19	8039182	Analysis of opposition to Keller Street sale motion/mechanic's lien, email and call with counsel (.8). Draft reply brief in connection with the Keller Street sale and revise same (2.3).	Zaro, David	3.1	2,441.25	186,957.45	WO HD TR_____
11/25/19	8032636	Work on joint motion regarding sale of	Fates, Edward (Ted)	5.0	2,970.00	189,927.45	WO HD TR_____



Trans Date	Index	Description of Service Rendered	Timekeeper	Hours	Fees	Sum	Circle	Action
		Patio 101 personal property and liquor license (1.4); address issues regarding Adam Lewis Construction objection to 132 Keller Street sale motion (.4); communications with Receiver and counsel for First Choice Bank regarding limited objection to Lamont Street sale motion (.5); work on reply to same (.4); discuss issues concerning release price for 132 Keller Street with Receiver and counsel for SFG (.5); revisions to motion to approve sale of Brighton Court property, discuss same with Receiver (.6); revisions to Patio 101 personal property sale motion (.4); meet and confer communications with SEC counsel regarding joint motion (.2); analyze issues raised in Axos statement of position, discuss same with Receiver (.6).						
11/25/19	8032749	Review executed Purchase and Sale documents, and revise Form Addendum for Overbid Purchase and Sale Agreements.	Lorenzen, Jonathan	2.7	1,409.40	191,336.85	WO	HD TR_____
11/26/19	8039450	Work on issues concerning ales free and clear of lien as to D Street and Keller properties, research lien issues (.6). Work on the draft of Keller property sale motion reply brief (1.2).	Zaro, David	1.8	1,417.50	192,754.35	WO	HD TR_____
11/26/19	8034056	Revisions to motion regarding engagement of auctioneer and sales of personal property and liquor licenses (1.1); discuss same with Receiver (.4); discuss Axos Bank release price for Thomas Avenue and	Fates, Edward (Ted)	2.8	1,663.20	194,417.55	WO	HD TR_____

Trans Date	Index	Description of Service Rendered	Timekeeper	Hours	Fees	Sum	Circle	Action
		related issues with Receiver (.3); discuss issues relating to potential eviction matter with G. Rodriguez (.3); revisions to reply brief in support of 132 Keller Street sale motion (.5); analyze issues regarding minute order on sale motions, advise Receiver regarding same (.2).						
11/27/19	8039677	Analysis of the issues concerning Keller real estate commission, emails with Receiver and counsel (.4). Work on the reply brief concerning sale of Keller properties and supporting Fates declaration (.3).	Zaro, David	0.7	551.25	194,968.80	WO	HD TR_____
11/27/19	8035623	Work on reply to Axos response to 1617 Thomas Avenue sale motion (.8); discuss same with Receiver (.2); communications with counsel for former Patio 101 landlord regarding sale approval process and timing (.2); confer with SEC counsel and counsel for Champion-Cain regarding Patio 101 joint motion (.3); discuss issues with release price for Thomas Avenue with counsel for Axos (.3); discuss one-month extension of Hlnes-Intersect and expense reimbursement with Receiver, assist with language for same (.4); advise Receiver on issues regarding sales of art pieces (.2).	Fates, Edward (Ted)	2.4	1,425.60	196,394.40	WO	HD TR_____
11/27/19	8037000	Review and revise reply in support of sale motion for 140 Keller St. (.5); draft declaration of T. Fates in support thereof (.3).	Aspis, Norman	0.8	324.00	196,718.40	WO	HD TR_____

Trans Date	Index	Description of Service Rendered	Timekeeper	Hours	Fees	Sum	Circle Action
12/02/19	8043828	Work on reply brief, call with counsel related to Commission/lien issues (.6). Calls with Receiver/counsel related to sales of Thomas and Keller (.3).	Zaro, David	0.9	708.75	197,427.15	WO HD TR_____
12/02/19	8040401	Revisions to motion to approve sale of Brighton Court property (.4); discuss same with Receiver (.2); advise on issues relating to Keller Street sale motion (.2); confer with SEC counsel regarding potential consent to Magistrate Judge for final decisions on sale motions (.2); initial work on joint motion regarding same (.3); revisions to motion regarding sales of personal property regarding artwork and food truck (.4); discuss same with Receiver (.2); work on Receiver declaration in support of Brighton Court sale motion (.6).	Fates, Edward (Ted)	2.5	1,485.00	198,912.15	WO HD TR_____
12/02/19	8046386	Revise PSA for Patio 101 while maintaining signatures (with authorization from both parties) to remove references to broker and finalize.	Klinger, Warren	1.1	519.75	199,431.90	WO HD TR_____
12/02/19	8047339	Analyze process regarding joint motion for consent to magistrate judge.	Williams, Rebecca	1.9	572.85	200,004.75	WO HD TR_____
12/02/19	8041257	Handle filing of reply in support of the Receiver's sale motion for 132 Keller Street (.3); review and prepare certification for protective order (.5).	Aspis, Norman	0.8	324.00	200,328.75	WO HD TR_____
12/03/19	8043963	Calls with Receiver and counsel related to the sale of the	Zaro, David	0.4	315.00	200,643.75	WO HD TR_____

Trans Date	Index	Description of Service Rendered	Timekeeper	Hours	Fees	Sum	Circle	Action
		Keller/Thompson properties, oral argument and advice related to strategy (.4).						
12/03/19	8041253	Work on notice of motion and proposed order for Brighton Court sale motion (.3); communications with law clerk regarding hearing date for sale motion (.1); advise Receiver regarding same (.1); communications with Receiver regarding escrow for Patio 101 sale (.5); work on Receiver's declaration in support of auctioneer/personal property sale motion (.6); communications with Receiver regarding same (.2); work on proposed order and notice of motion (.4); discuss terms of potential sale of Goldfinch personal property and liquor license with Receiver, PSA and lease amendment needed for same (.6); review UCC filings as to Goldfinch personal property (.3); communications with counsel for Axos Bank regarding 12/5 hearing and sale approval order (.3); communications with SEC counsel regarding 12/5 hearing (.1); analyze issues regarding Adam Lewis Construction mechanic's lien (.2); discuss issues regarding Pullman sale and 301 D Street with Receiver (.3); discuss steps relating to trademarks with Receiver (.2); communications with counsel for Ovation regarding telephonic appearance at 12/5 hearing (.1); revisions to joint motion and proposed	Fates, Edward (Ted)	4.9	2,910.60	203,554.35	WO	HD TR_____

Trans Date	Index	Description of Service Rendered	Timekeeper	Hours	Fees	Sum	Circle Action
		order regarding consent to magistrate judge for sale motion (.6).					
12/03/19	8042007	Review Lease documents for Goldfinch.	Lorenzen, Jonathan	0.7	365.40	203,919.75	WO HD TR_____
12/03/19	8046397	Prepare PSA for Goldfinch based on precedent for Patio 101.	Klinger, Warren	2.5	1,181.25	205,101.00	WO HD TR_____
12/03/19	8047337	Draft joint motion for consent to magistrate judge and order.	Williams, Rebecca	2.3	693.45	205,794.45	WO HD TR_____
12/03/19	8042733	Review and transmit letter to A. Taylor (.2).	Aspis, Norman	0.2	81.00	205,875.45	WO HD TR_____
12/04/19	8045514	Call with Receiver counsel related to joint stipulation as to Keller liens (.2). Email proposal to counsel for Keller lien claimant re mechanic's lien release and related issues (.4).	Zaro, David	0.6	472.50	206,347.95	WO HD TR_____
12/04/19	8042421	Communications with Receiver and counsel for Biomed regarding operating expenses and termination of lease (.3); communications with SEC counsel regarding draft joint motion regarding consent to Magistrate Judge for sale motions (.2); discuss exhibit for auctioneer/personal property sale motion with Receiver (.2); finalize motion and supporting papers (.2); analyze issues regarding escrow instructions for Patio 101 sale and discuss same with Receiver (.8); conference call with Receiver and escrow officer regarding same (.4); revisions to escrow instructions (.4); discuss preparation for 12/5 hearing with Receiver (.2); discuss issues	Fates, Edward (Ted)	3.8	2,257.20	208,605.15	WO HD TR_____

Trans Date	Index	Description of Service Rendered	Timekeeper	Hours	Fees	Sum	Circle	Action
		regarding Valle Vista property and tenant at same with Receiver (.2); analyze information regarding proposed sale of Rancho Mirage property, communications with G. Rodriguez regarding same (.4); initial work on motion for approval of sale (.3); advise on issues relating to termination of ANI employee (.2).						
12/04/19	8046888	Prepare PSA for RE sale and Lease assignment for sales of entire restaurant businesses (1.4); Prepare Goldfinch PSA 0.9); Analysis of escrow company's escrow instructions (.4); telephone conference with escrow company (.2); comments to revised escrow instructions (1.1).	Klinger, Warren	4.0	1,890.00	210,495.15	WO HD	TR_____
12/05/19	8048584	Call with counsel, emails concerning oral argument, the hearing and sales process.	Zaro, David	0.4	315.00	210,810.15	WO HD	TR_____
12/05/19	8044280	Prepare for hearing on 3 pending sale motions (.8); advise Receiver on issues relating to termination of ANI employee (.2); discuss draft amendment to Hines-Intersect lease with Receiver (.2); advise on issues relating to escrow instructions for Patio 101 sale (.4); attend hearing on 3 pending sale motions (1.2); review order authorizing engagement of auctioneers and brokers, advise Receiver regarding same (.2); address issues regarding potential sale of interest in Pullman Lofts and analysis of same (.3);	Fates, Edward (Ted)	4.9	2,910.60	213,720.75	WO HD	TR_____

Trans Date	Index	Description of Service Rendered	Timekeeper	Hours	Fees	Sum	Circle	Action
		communications with counsel for SFG regarding hearing on 132 Keller Street sale motion (.2); advise on issues regarding PSA for Patio on Goldfinch assets (.3); work on motion for approval of sale of Rancho Mirage property (1.1).						
12/05/19	8045641	Review Lease issues related to Goldfinch and Patio 101 properties.	Lorenzen, Jonathan	0.5	261.00	213,981.75	WO	HD TR_____
12/05/19	8051858	Analysis of Escrow instructions revisions (for Patio 101) (2.0); Prepare Goldfinch PSA documentation (1.1).	Klinger, Warren	3.1	1,464.75	215,446.50	WO	HD TR_____
12/06/19	8046023	Communications with Receiver and counsel for Patio 101 landlord regarding status and escrow instructions (.7); discuss issues relating to loan on Rancho Mirage property with Receiver (.2); discuss draft joint motion regarding consent to Magistrate Judge for sale motions with SEC counsel and counsel for Champion-Cain (.3); finalize and file same (.2). communications with Receiver and counsel for SFG regarding mortgage on Rancho Mirage property (.5); address issues regarding Goldfinch draft PSA and lease amendment (.2); discuss issues regarding Ultimate Software with Receiver (.2);	Fates, Edward (Ted)	2.3	1,366.20	216,812.70	WO	HD TR_____
12/06/19	8045849	Review Lease documents for Goldfinch, and prepare Third Amendment to Lease (1.8); revise Purchase and Sale Agreement for	Lorenzen, Jonathan	3.1	1,618.20	218,430.90	WO	HD TR_____

Trans Date	Index	Description of Service Rendered	Timekeeper	Hours	Fees	Sum	Circle	Action
		Goldfinch (0.8); review draft First Amendment and Assignment for Goldfinch (0.5).						
12/06/19	8051905	Prepare form PSAs for war room for sales of entire businesses (1.9); Prepare Goldfinch documentation (0.9); Comments to revised escrow instructions (0.7).	Klinger, Warren	3.5	1,653.75	220,084.65	WO HD	TR_____
12/09/19	8047529	Communications with Receiver and counsel for Patio 101 landlord regarding escrow instructions and ABC requirements (.3); communications with counsel for Goldfinch landlord regarding potential sale transaction, UCC issues, taxes and related issues (.2); address issues regarding proposed assignment of lease from Hines-Intersect landlord (.2); analyze SFG proposal regarding Rancho Mirage loan, default interest and attorney fees (.3); discuss same with Receiver (.2); prepare response to proposal (.3); respond to counsel for Biomed regarding liquor license (.2).	Fates, Edward (Ted)	1.7	1,009.80	221,094.45	WO HD	TR_____
12/09/19	8048004	Review draft assignment of Lease for Patio 101.	Lorenzen, Jonathan	0.2	104.40	221,198.85	WO HD	TR_____
12/09/19	8052887	Prepare form PSAs (2.5); Analysis of revised escrow instructions (.5).	Klinger, Warren	3.0	1,417.50	222,616.35	WO HD	TR_____
12/10/19	8050563	Evaluate issues and call related to LL claim, offset from the sale of FF&E, license for the Goldfinch property, negotiations as to terms of offset (.3). Call with counsel as to related FF&E	Zaro, David	1.4	1,102.50	223,718.85	WO HD	TR_____



Trans Date	Index	Description of Service Rendered	Timekeeper	Hours	Fees	Sum	Circle	Action
		and license sale process (.3). Prepare for/attend conference call with Goldfinch counsel and Goldfinch (.8).						
12/10/19	8048954	Discuss Patio 101 escrow issues and Goldfinch UCC issues with Receiver (.6); communications with Receiver and counsel for SFG regarding payoff amount for mortgage on Rancho Mirage property and related issues (.5).	Fates, Edward (Ted)	1.1	653.40	224,372.25	WO HD	TR_____
12/10/19	8052888	Attention to UCC filings and preparation of termination statements (1.8).	Klinger, Warren	1.8	850.50	225,222.75	WO HD	TR_____
12/11/19	8050114	Revisions to Rancho Mirage sale motion (.6); discuss same with Receiver (.3); communications with counsel for SFG regarding issues with Rancho Mirage mortgage (.3); discuss amendment to listing agreement for Carmel property with G. Rodriguez (.2); initial work on same (.3); calls/emails with Receiver regarding revisions to Goldfinch PSA and lease amendment (.6); advise Receiver on order on limited consent to Magistrate Judge (.1); revisions to bill of sale for Keller St. personal property (.2); address issues regarding ANI temp employee and advise G. Rodriguez regarding same (.6).	Fates, Edward (Ted)	3.2	1,900.80	227,123.55	WO HD	TR_____
12/11/19	8051367	Prepare summary of issues for proposed Amendment/Assignment for Patio at Intersect (0.8); review broker agreement for Carmel property (0.5).	Lorenzen, Jonathan	1.4	730.80	227,854.35	WO HD	TR_____

Trans Date	Index	Description of Service Rendered	Timekeeper	Hours	Fees	Sum	Circle Action
12/11/19	8052892	Telephone conference with Receiver (.3); Revision PSA and Lease Amendment and circulate (1.6).	Klinger, Warren	1.9	897.75	228,752.10	WO HD TR_____
12/12/19	8056814	Several emails concerning the releases in the Goldfinch matter, follow-up with counsel/Receiver (.4)	Zaro, David	0.4	315.00	229,067.10	WO HD TR_____
12/12/19	8051775	Work on Receiver declaration, notice of motion, and proposed order for sale of Rancho Mirage property (.8); analyze orders approving Lamont St. and Thomas Ave sales, advise Receiver regarding same (.4); communications with Receiver and Patio 101 landlord regarding liquor license transfer issues (.4); revisions to amendment to listing agreement with broker for Carmel property (.2); analyze order requiring proposed property sale procedures and advise Receiver regarding same (.2); address issues with draft PSA for potential restaurant sales (.3); advise Receiver on issues regarding execution of Goldfinch PSA and lease amendment (.3); revisions to joint motion regarding sale of Patio 101 personal property and liquor license (.3).	Fates, Edward (Ted)	2.9	1,722.60	230,789.70	WO HD TR_____
12/12/19	8051890	Review trust agreement for Carmel property and complete Amendment to Listing Agreement.	Lorenzen, Jonathan	0.6	313.20	231,102.90	WO HD TR_____
12/12/19	8052750	Draft employee confidentiality agreement.	Bell, Melissa	1.4	567.00	231,669.90	WO HD TR_____
12/12/19	8056877	Attention to revisions to Goldfinch	Klinger, Warren	1.6	756.00	232,425.90	WO HD TR_____

Trans Date	Index	Description of Service Rendered	Timekeeper	Hours	Fees	Sum	Circle Action
		documents (1.6)					
12/12/19	8052965	Review and further prepare confidentiality agreement.	Alexander, Grant	0.4	250.20	232,676.10	WO HD TR_____
12/13/19	8061272	Analysis of court sale order, assess next steps (.4). Emails with counsel/Receiver re sales (.2).	Zaro, David	0.6	472.50	233,148.60	WO HD TR_____
12/13/19	8053066	Communications with G. Rodriguez regarding confidentiality agreement for ANI temporary employee regarding HR-related tasks (.3); analyze termination provisions of Paycom contract and advise Receiver regarding same (.4); advise on escrow instructions for Goldfinch sale (.4); advise G. Rodriguez on issues regarding termination of property management contract (.2); revisions to joint motion and proposed order regarding sale of Patio 101 personal property (.4); meet and confer communications with SEC counsel and counsel for Champion-Cain regarding same (.2); analyze order approving 132 Keller Street sale and advise Receiver regarding same (.4).	Fates, Edward (Ted)	2.3	1,366.20	234,514.80	WO HD TR_____
12/13/19	8053582	Review form Purchase and Sale Agreements.	Lorenzen, Jonathan	0.2	104.40	234,619.20	WO HD TR_____
12/13/19	8053963	Correspondence regarding confidentiality agreement.	Bell, Melissa	0.2	81.00	234,700.20	WO HD TR_____
12/13/19	8056886	Analysis and comments to revised escrow instructions (.4); Prepare form PSAs (1.9).	Klinger, Warren	2.3	1,086.75	235,786.95	WO HD TR_____
12/16/19	8061906	Analysis of the Court's order	Zaro, David	0.6	472.50	236,259.45	WO HD TR_____

Trans Date	Index	Description of Service Rendered	Timekeeper	Hours	Fees	Sum	Circle Action
		concerning sale, sale process and impact on liens/claims (.4). Call with counsel to advise as to the Receiver response to order/advice re same (.2).					
12/16/19	8054483	Work on proposal regarding sale procedures per Court order (1.8); follow up regarding escrow sign off on Patio 101 PSA (.2); address title/escrow issues for Lamont Street closing, communications with G. Rodriguez regarding same (.4); advise Receiver on issues relating to Hines-Intersect amendment and assignment of lease (.5).	Fates, Edward (Ted)	2.9	1,722.60	237,982.05	WO HD TR_____
12/16/19	8055651	Review updated forms for Purchase and Sale Agreements.	Lorenzen, Jonathan	0.3	156.60	238,138.65	WO HD TR_____
12/17/19	8056070	Advise G. Rodriguez regarding closing issues for Thomas Ave. sale (.3); finalize Joint Motion regarding Patio 101 sale (.2); analyze issues regarding SFG loan on 132 Keller Street and advise Receiver regarding same (.6).	Fates, Edward (Ted)	1.1	653.40	238,792.05	WO HD TR_____
12/17/19	8056734	Prepare revised version of Amendment and Assignment for Hines Intersect (0.8); review and revise Purchase and Sale Agreement forms (0.4).	Lorenzen, Jonathan	1.2	626.40	239,418.45	WO HD TR_____
12/18/19	8057722	Work on Joint Motion regarding sale of personal property and liquor license for Patio on Goldfinch.	Fates, Edward (Ted)	1.4	831.60	240,250.05	WO HD TR_____
12/18/19	8057881	Work on Joint Motion regarding sale of personal property and liquor	Fates, Edward (Ted)	2.5	1,485.00	241,735.05	WO HD TR_____

Trans Date	Index	Description of Service Rendered	Timekeeper	Hours	Fees	Sum	Circle	Action
		license for Goldfinch (1.6); discuss same with Receiver (.3); call with Receiver, Champion-Cain, and counsel for Champion-Cain regarding issues relating to R. Mosely and attorney-client privilege claims relating to document productions (.3); communications with counsel for worker comp carrier regarding audit of policy (.3).						
12/18/19	8058132	Teleconferences with counsel re investor objection to proposed use of funds recovered from Chicago Title (0.3).	Del Castillo, Joshua	0.3	178.20	241,913.25	WO	HD TR_____
12/18/19	8057245	Review and revise Fifth Amendment to Lease and accompanying Bill of Sale related to Hines Intersect.	Lorenzen, Jonathan	1.2	626.40	242,539.65	WO	HD TR_____
12/19/19	8060674	Finalize joint motion and proposed order regarding Goldfinch (.4); discuss same with Receiver (.2); work on notice regarding no overbids for Brighton Court property (.2); advise Receiver on sale closing issues for Thomas Ave. and 132 Keller Street (.6); communications with counsel for Champion-Cain regarding Thomas Ave. issues (.2).	Fates, Edward (Ted)	1.6	950.40	243,490.05	WO	HD TR_____
12/20/19	8061775	Advise Receiver on employee termination issues and communications regarding same (.5); revisions to independent contractor agreement for ANI in-house counsel (.7); discuss same with Receiver (.3); communications with ANI in-house counsel regarding same (.2);	Fates, Edward (Ted)	1.9	1,128.60	244,618.65	WO	HD TR_____

Trans Date	Index	Description of Service Rendered	Timekeeper	Hours	Fees	Sum	Circle	Action
		communications with Receiver and counsel for SFG regarding 132 Keller Street closing (.3).						
12/20/19	8061632	Review and revise Fifth Amendment to Patio Lease at Hines Intersect.	Lorenzen, Jonathan	1.3	678.60	245,297.25	WO	HD TR_____
12/22/19	8067115	Analysis of Receiver's comments to PSA documents (.6).	Klinger, Warren	0.6	283.50	245,580.75	WO	HD TR_____
12/23/19	8065820	Analysis of client email related to Lamont Sale, call related to the payoff issues (.4). Email to First Choice related to Lamont sale/payoff (.7).	Zaro, David	1.1	866.25	246,447.00	WO	HD TR_____
12/23/19	8063464	Communications with Receiver and ANI in-house counsel regarding execution of independent contractor agreement (.2); call with Receiver and counsel regarding revisions to restaurant sale PSA and related documents (1.1).	Fates, Edward (Ted)	1.3	772.20	247,219.20	WO	HD TR_____
12/23/19	8067124	Telephone conference regarding transfer and sale documentation (.9); Revisions to transfer and sale documentation based on call (1.4); Comments to confidentiality agreement (.7); Revisions to Sale Instructions document (.2).	Klinger, Warren	3.2	1,512.00	248,731.20	WO	HD TR_____
12/26/19	8065858	Advise on revisions to form PSA for restaurant sales.	Fates, Edward (Ted)	0.3	178.20	248,909.40	WO	HD TR_____
12/26/19	8065110	Correspond with Landlord regarding Patio Lease and Hines Intersect, and coordinate signature.	Lorenzen, Jonathan	0.6	313.20	249,222.60	WO	HD TR_____
12/26/19	8067134	Revise PSA and sale instructions based on comments from liquor	Klinger, Warren	3.5	1,653.75	250,876.35	WO	HD TR_____

Trans Date	Index	Description of Service Rendered	Timekeeper	Hours	Fees	Sum	Circle Action
		license counsel and receiver (3.5).					
12/27/19	8067154	Telephone conference with receiver (.4); Revise PSA documentation (1.2).	Klinger, Warren	1.6	756.00	251,632.35	WO HD TR_____
12/28/19	8067138	Revise transfer and sale documentation (2.9).	Klinger, Warren	2.9	1,370.25	253,002.60	WO HD TR_____
12/30/19	8067130	Review and revise Access Agreement for potential buyer's to inspect properties.	Lorenzen, Jonathan	1.4	730.80	253,733.40	WO HD TR_____
12/30/19	8069954	Revise PSA documents (1.3); Revise and confirm Lease Assignment PSA to the changes made to the Real Estate Sale PSA (1.8).	Klinger, Warren	3.1	1,464.75	255,198.15	WO HD TR_____
12/31/19	8068458	Review updated purchase and sale agreement forms and related correspondence.	Lorenzen, Jonathan	0.2	104.40	255,302.55	WO HD TR_____
12/31/19	8069973	Revise Lease Assignment PSA based on comments from Liquor License counsel.	Klinger, Warren	1.6	756.00	256,058.55	WO HD TR_____

### Proforma Summary

Timekeeper Number	Timekeeper	Hours	Rate	Amounts
000313	David Zaro	28.7	787.50	22,601.25
000820	John Kaup	4.0	292.50	1,170.00
001578	Debra Hall	14.8	715.50	10,589.40
001665	Edward (Ted) Fates	223.2	594.00	132,580.80
001842	Joshua Del Castillo	0.3	594.00	178.20
002094	Alana Thorbourne-Carlyl	0.4	508.50	203.40
002115	Jonathan Lorenzen	87.1	522.00	45,466.20
002244	Melissa Bell	4.6	405.00	1,863.00
002283	Warren Klinger	67.7	472.50	31,988.25
002306	Megan Thiels	4.2	324.00	1,360.80
002348	Rebecca Williams	4.2	301.50	1,266.30
002369	Norman Aspis	9.2	405.00	3,726.00

Timekeeper Number	Timekeeper	Hours	Rate	Amounts
002372	Katherine Kraus	1.6	652.50	1,044.00
002408	Grant Alexander	1.3	625.50	813.15
002411	Wade Fisher	4.4	274.50	1,207.80
		455.7		256,058.55
Total Fees				256,058.55
Total Disbursements				0.00

#### Attorney Billing Instructions

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

#### Billing Instructions

expires 6/30/2020: 10% off standard rates (automatic); no text editing; copies @ .10

#### Account Summary- As Of 12/31/2019

Fiscal YTD				Calendar YTD				LTD		
	Total	Fees	Disbursement	Total	Fees	Disbursement	Total	Fees	Disbursement	
Worked	256,145.55	256,058.55	87.00	256,145.55	256,058.55	87.00	256,145.55	256,058.55	87.00	
Unbilled Adj	(87.00)	0.00	(87.00)	0.00	0.00	0.00	(87.00)	0.00	(87.00)	
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	
<b>WIP Balance</b>	<b>321,233.40</b>	<b>321,233.40</b>	<b>0.00</b>							
<b>AR Balance</b>	<b>0.00</b>	<b>0.00</b>	<b>0.00</b>							
<b>Unalloc Payment</b>	<b>0.00</b>									
<b>Client Trust Balance</b>	<b>0.00</b>									

#### Billing Address

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



ATTN: E3 Advisors

02/14/20 10:00:51 PROFORMA STATEMENT FOR MATTER 378827-00006 (Krista Freitag, as Receiver for ANI Development, LLC, et al.) (SEC v. Champion-Cain - Claims & Distributions)

### Preliminary Billing Form

Billing Atty: 001665 - Edward Fates

Matter #: 378827-00006

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

Date of Last Billing:

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

Proforma Number 1456089

Client/Matter Joint Group # 378827-1

### Fees for Matter 378827-00006 (SEC v. Champion-Cain - Claims & Distributions)

Trans Date	Index	Description of Service Rendered	Timekeeper	Hours	Fees	Sum	Circle Action
09/05/19	7949075	Respond to direct inquiries from investors and their counsel.	Fates, Edward (Ted)	0.6	356.40	356.40	WO HD TR_____
09/07/19	7950375	Assist in preparing initial responses to inquiries from ANI investors (.3); discuss call from counsel for investor and response to same with Receiver (.2).	Fates, Edward (Ted)	0.5	297.00	653.40	WO HD TR_____
09/12/19	7955361	Call/emails with counsel for investor Ovation Partners.	Fates, Edward (Ted)	0.4	237.60	891.00	WO HD TR_____
09/13/19	7956976	Call/emails with counsel for Bank of California regarding receivership and loan made to Kim Funding, involuntary bankruptcy as to K. Peterson, Chicago Title issues (.6); call with counsel for lender regarding mortgage on ANI office building (.3); communications with counsel for Ovation Partners, review Ovation side agreement with ANI (.3).	Fates, Edward (Ted)	1.2	712.80	1,603.80	WO HD TR_____
09/13/19	8011929	Draft cease and desist letters to lessors (.4); confer with landlords regarding the same (.3).	Aspis, Norman	0.7	283.50	1,887.30	WO HD TR_____
09/16/19	7958312	Communications with counsel	Fates, Edward (Ted)	0.2	118.80	2,006.10	WO HD TR_____

Trans Date	Index	Description of Service Rendered	Timekeeper	Hours	Fees	Sum	Circle	Action
		representing investor group.						
09/16/19	7959029	Draft and transmit letters regarding notices to pay rent or quit and compile list of letters transmitted (.7).	Aspis, Norman	0.7	283.50	2,289.60	WO HD	TR_____
09/17/19	7959201	Respond to inquiry from secured creditor regarding loans and collateral properties (.2); communications with outside ANI counsel regarding collection agency contact for ANI credit card bill (.3); analyze correspondence from counsel for secured creditor Seattle Funding Group (.4); analyze information from Champion-Cain regarding creditor claims (.2).	Fates, Edward (Ted)	1.1	653.40	2,943.00	WO HD	TR_____
09/18/19	7961050	Communications with ANI outside counsel and counsel for secured creditor regarding notices and document productions (.4); work on receivership notification letter to lenders (.5).	Fates, Edward (Ted)	0.9	534.60	3,477.60	WO HD	TR_____
09/19/19	7962046	Communications with counsel for lender regarding loan documents and security interests (.3).	Fates, Edward (Ted)	0.3	178.20	3,655.80	WO HD	TR_____
09/20/19	7963555	Communications with counsel for CalPrivate Bank regarding position on turnover of funds and security interest in same (.2); advise Receiver regarding same (.2); respond to calls from counsel representing investor groups (.4).	Fates, Edward (Ted)	0.8	475.20	4,131.00	WO HD	TR_____
09/22/19	7968804	Emails to/from landlord counsel related to claims of	Zaro, David	0.3	236.25	4,367.25	WO HD	TR_____

Trans Date	Index	Description of Service Rendered	Timekeeper	Hours	Fees	Sum	Circle	Action
		landlord/enforcement and status.						
09/23/19	7969331	Email/call with Goldfinch landlord counsel concerning claims, follow-up as to administration expenses (.2). Analysis of the CalPrivate Bank loan documents, claims of security interests in accounts, follow-up to provide legal advice (1.4). Emails with lender claimant/Symetra and follow-up call with Receiver (.3).	Zaro, David	1.9	1,496.25	5,863.50	WO HD TR	_____
09/23/19	7965059	Analyze issues/strategy regarding CalPrivate Bank's claimed security interest in funds in Chicago Title account (.2); communications with counsel representing investor group (.2).	Fates, Edward (Ted)	0.4	237.60	6,101.10	WO HD TR	_____
09/24/19	7967745	Review documents regarding preliminary analysis of the SBA loans/First Choice - Fireside (1.4). Call with counsel and counsel for First Choice related to loans and FF&E valuation (.3). Follow-up email to Receiver and counsel related to the lender claims and follow up (.3).	Zaro, David	2.0	1,575.00	7,676.10	WO HD TR	_____
09/25/19	7969780	Work on/evaluate documents and records, analysis of approach to leases/landlords competing claims and valuation of FF&E, follow-up communications with counsel for landlord/counsel (1.8). Email with First choice counsel, follow-up to address loans and next steps with several lenders counsel and follow-up email (1.5).	Zaro, David	3.3	2,598.75	10,274.85	WO HD TR	_____

Trans Date	Index	Description of Service Rendered	Timekeeper	Hours	Fees	Sum	Circle Action
09/25/19	7967906	Advise Receiver on responses to unique investor inquiries.	Fates, Edward (Ted)	0.4	237.60	10,512.45	WO HD TR_____
09/26/19	7972845	Review/analysis of emails/background of BankDirect Premium Funding and prepare for call with counsel (.6). Call with BankDirect Premium Funding related to life insurance/loan and creditor rights (.4). Prepare for and attend call with counsel for lender, Mr. Heyden, review of loan documents, follow-up email (.7). Emails/review of certain records concerning First Choice loans and assess lien claims (.4). Emails with First choice counsel related to appraisal and lien claims (.3). Email related to Seattle Funding as to records (.4). Legal work on the landlord letters concerning vacation of premises, lease terminations, claims of landlords/FF&E (1.0).	Zaro, David	3.5	2,756.25	13,268.70	WO HD TR_____
09/26/19	7969539	Address correspondence from former landlord regarding vacated space and claim for unpaid rent (.3); advise Receiver regarding same (.1).	Fates, Edward (Ted)	0.4	237.60	13,506.30	WO HD TR_____
09/27/19	7973014	Emails related to Seattle Funding loans, Receiver response to upcoming maturities/investigation of underwriting (.8). Email with lender counsel/ lien claimant (.2). further email communications related to lender claims/stay and preservation issues, analysis of loan agreement, status as to receivership properties (1.3). Call with lender counsel/Seattle	Zaro, David	2.6	2,047.50	15,553.80	WO HD TR_____

Trans Date	Index	Description of Service Rendered	Timekeeper	Hours	Fees	Sum	Circle Action
		Funding (.3).					
09/27/19	8011951	Review letter from Pacific Premier Bank and confer with counsel regarding the same (.2).	Aspis, Norman	0.2	81.00	15,634.80	WO HD TR_____
09/28/19	7973319	Several calls/emails to/from landlord counsel related to Goldfinch property lease (.5). Emails with counsel/Receiver related to the Pacific Premier Bank/3415 building (.3).	Zaro, David	0.8	630.00	16,264.80	WO HD TR_____
09/28/19	8012169	Several emails with Receiver and counsel, review/revise investor draft letter (.4).	Zaro, David	0.4	315.00	16,579.80	WO HD TR_____
09/28/19	7971117	Work on initial letter to investors and creditors (1.3); discuss same with Receiver (.2); communications with counsel for lender regarding appraisal of restaurant equipment collateral (.2).	Fates, Edward (Ted)	1.7	1,009.80	17,589.60	WO HD TR_____
09/29/19	7973350	Follow-up on further emails concerning the landlord for the Goldfinch property.	Zaro, David	0.4	315.00	17,904.60	WO HD TR_____
09/29/19	7973881	Draft letter in response to default and intent to foreclose letter from Pacific Premier Bank (.5).	Aspis, Norman	0.5	202.50	18,107.10	WO HD TR_____
09/30/19	7975795	Revise/finalize letter to Pacific Premier Bank concerning the loan/3415 Mission Blvd property (.4). Emails related to Goldfinch property/transition issues (.3).	Zaro, David	0.7	551.25	18,658.35	WO HD TR_____
09/30/19	7971964	Revisions to investor notification letter (.4); analyze issues with W. Hamilton	Fates, Edward (Ted)	1.2	712.80	19,371.15	WO HD TR_____

Trans Date	Index	Description of Service Rendered	Timekeeper	Hours	Fees	Sum	Circle Action
		severance agreement and claims regarding same (.3); communications with Receiver regarding sources of investor contact information (.3); call from counsel for investor (.2).					
10/01/19	7978269	Analysis of communications with the Pacific Premier Bank and loan, email response re order/stay (.6). Review communications and email with counsel/lender related to the landlord claims (.2). Follow-up call and emails with Receiver, Goldfinch attorney and counsel related to the Goldfinch lease and other lease termination (.8).	Zaro, David	1.6	1,260.00	20,631.15	WO HD TR_____
10/01/19	7976878	Advise Receiver on employee labor board claim (.2); advise Receiver on issues relating to investor/creditor list and letter (.4).	Fates, Edward (Ted)	0.6	356.40	20,987.55	WO HD TR_____
10/02/19	7978183	Advise on issues regarding dissemination of investor/creditor letter with Receiver and G. Rodriguez (.7); final revisions to letter (.4); send letter to counsel for investors (.3).	Fates, Edward (Ted)	1.4	831.60	21,819.15	WO HD TR_____
10/04/19	7981427	Conference with Receiver related to loans, payments, freeze and strategy (.3).	Zaro, David	0.3	236.25	22,055.40	WO HD TR_____
10/04/19	7980138	Address issues regarding mail notice of investor letter, communications with A. Herren regarding same.	Fates, Edward (Ted)	0.2	118.80	22,174.20	WO HD TR_____
10/07/19	7982988	Emails with landlord related to lease termination agreement.	Zaro, David	0.3	236.25	22,410.45	WO HD TR_____
10/07/19	8012183	Follow-up email concerning the lender claimants, advice to counsel	Zaro, David	0.2	157.50	22,567.95	WO HD TR_____

Trans Date	Index	Description of Service Rendered	Timekeeper	Hours	Fees	Sum	Circle	Action
		(.2).						
10/07/19	7981468	Communications with counsel for lenders regarding secured claims as to receivership properties.	Fates, Edward (Ted)	0.4	237.60	22,805.55	WO HD	TR_____
10/08/19	7982169	Respond to inquiries from counsel for secured creditors R. Renken and First Choice Bank (.6); call with counsel for American National Life Insurance regarding mortgages on receivership properties (.5).	Fates, Edward (Ted)	1.1	653.40	23,458.95	WO HD	TR_____
10/09/19	7983303	Advise Receiver regarding responses to unique investor inquiries (.3); revisions to same (.1); discuss communications from Merit Financial with Receiver and respond to same (.4).	Fates, Edward (Ted)	0.8	475.20	23,934.15	WO HD	TR_____
10/10/19	7986231	Call with ANI in-house counsel and insurance broker regarding employee and former employee D&O insurance claims.	Fates, Edward (Ted)	0.2	118.80	24,052.95	WO HD	TR_____
10/11/19	7992266	Follow-up on Bank Direct claims, life insurance, email to Champion-Cain with letter demand (.4). Analysis of lender claims including Pacific Premiere and American National Insurance Company, follow-up with counsel and emails (.4).	Zaro, David	0.8	630.00	24,682.95	WO HD	TR_____
10/11/19	7987633	Analyze lender documents regarding mortgage on Ingraham Street property and advise Receiver regarding same (.4); discuss investor inquiries regarding Cultivate and steps to evaluate product with Receiver (.3); work on response to	Fates, Edward (Ted)	0.9	534.60	25,217.55	WO HD	TR_____



Trans Date	Index	Description of Service Rendered	Timekeeper	Hours	Fees	Sum	Circle	Action
		same (.2).						
10/14/19	7992293	Emails related to the Goldfinch lease, the FF&E, follow-up with counsel (.3).	Zaro, David	0.3	236.25	25,453.80	WO HD	TR_____
10/14/19	7988449	Follow up with Merit Financial regarding document production (.3); communications with counsel for investor group regarding contact information for investor clients (.2).	Fates, Edward (Ted)	0.5	297.00	25,750.80	WO HD	TR_____
10/15/19	7992324	Calls/emails with several investors related to the pending motion, Receiver and claims issues (.6).	Zaro, David	0.6	472.50	26,223.30	WO HD	TR_____
10/15/19	8006495	Telephone call and exchange of e-mails re: investor inquiry and response to same (.3); analysis and review of correspondence re: investor lawsuit (.2).	Farrell, Michael	0.5	357.75	26,581.05	WO HD	TR_____
10/15/19	7990393	Respond to direct inquiry from investor (.3); communications with investor Merit Financial regarding document production (.4); initial review of documents produced (.2).	Fates, Edward (Ted)	0.9	534.60	27,115.65	WO HD	TR_____
10/16/19	7992726	Several calls with investors concerning the receivership, claims, BK and hearing.	Zaro, David	0.4	315.00	27,430.65	WO HD	TR_____
10/16/19	8006326	Review and analysis of correspondence and default notices.	Farrell, Michael	0.2	143.10	27,573.75	WO HD	TR_____
10/16/19	7990990	Respond to direct inquiry from counsel for investor.	Fates, Edward (Ted)	0.3	178.20	27,751.95	WO HD	TR_____
10/17/19	7994812	Several calls with investors related to the notices/pending motion and follow-up thereon (.4).	Zaro, David	0.4	315.00	28,066.95	WO HD	TR_____

Trans Date	Index	Description of Service Rendered	Timekeeper	Hours	Fees	Sum	Circle Action
10/17/19	7991888	Discuss issues with Pacific Premier Bank claim with Receiver (.2); review correspondence from lender regarding secured claims and respond to same (.3); update Receiver regarding same (.1); review anonymous letter and advise Receiver regarding same (.2).	Fates, Edward (Ted)	0.8	475.20	28,542.15	WO HD TR_____
10/18/19	7994841	Several emails/calls regarding lender claims and letters/email response and follow-up thereon as to issue (.4); Email with counsel and Receiver regarding Goldfinch asset/claims/monetizing asset (.3); Several calls from counsel for Goldfinch related to lease and FF&E (.2).	Zaro, David	0.9	708.75	29,250.90	WO HD TR_____
10/18/19	7994280	Respond to inquiry from counsel for First Choice Bank.	Fates, Edward (Ted)	0.1	59.40	29,310.30	WO HD TR_____
10/21/19	8090524	Call/emil related to the lender claims/First Choice (.3). Several calls/email with investors related to the hearing, case status and issues re claims (.4).	Zaro, David	0.7	551.25	29,861.55	WO HD TR_____
10/21/19	7994664	Advise Receiver on issues relating to former employee and labor board claims (.2); initial work on letter to same (.2); address investor correspondence and advise Receiver regarding same (.1); call with counsel for American National Insurance regarding loans secured by receivership properties (.8).	Fates, Edward (Ted)	1.3	772.20	30,633.75	WO HD TR_____
10/22/19	7998611	Emails/assess lender	Zaro, David	0.7	551.25	31,185.00	WO HD TR_____

Trans Date	Index	Description of Service Rendered	Timekeeper	Hours	Fees	Sum	Circle	Action
		correspondence related to the First Choice and SFG loans (.4). Follow-up on the life insurance lender and emails with counsel for the lender (.3).						
10/23/19	8000036	Conference call with SBA lender/First Choice Bank counsel, bank officer and Receiver re SBA loans, follow-up with Receiver (.6).	Zaro, David	0.6	472.50	31,657.50	WO HD	TR_____
10/24/19	7998854	Revisions to letter to employee claimant regarding litigation stay.	Fates, Edward (Ted)	0.3	178.20	31,835.70	WO HD	TR_____
10/28/19	8003072	Research/analysis of the loan documents from First Choice Bank and Fireside, loan review and assess rights/interests and strategy (.7). Emails with Receiver and counsel as to Fireside and First Choice loan/lease termination (.4).	Zaro, David	1.1	866.25	32,701.95	WO HD	TR_____
10/28/19	8001124	Advise Receiver regarding responses to unique investor inquiries.	Fates, Edward (Ted)	0.3	178.20	32,880.15	WO HD	TR_____
10/29/19	8012219	Work on report to investors related to the third party litigation (.6).	Zaro, David	0.6	472.50	33,352.65	WO HD	TR_____
10/29/19	8003016	Respond to direct investor inquiries regarding claims process (.3); analyze and advise Receiver regarding City claims for occupancy taxes (.4).	Fates, Edward (Ted)	0.7	415.80	33,768.45	WO HD	TR_____
10/31/19	8006365	Advise Receiver regarding postings and updates to receivership website.	Fates, Edward (Ted)	0.2	118.80	33,887.25	WO HD	TR_____
11/04/19	8010723	Discuss update to investors and answers to frequently asked questions with Receiver (.3); work on	Fates, Edward (Ted)	1.3	772.20	34,659.45	WO HD	TR_____

Trans Date	Index	Description of Service Rendered	Timekeeper	Hours	Fees	Sum	Circle	Action
		same (.8); discuss mechanic's lien recorded by 301 D Street subcontractor with Receiver (.2).						
11/05/19	8013387	Email/call with Receiver re lender claims and attend to disputes with lender and default issues (.4). Email/call with the life insurance policies and lender's claims (.3).	Zaro, David	0.7	551.25	35,210.70	WO HD	TR_____
11/05/19	8012674	Advise Receiver regarding answers to frequently asked questions.	Fates, Edward (Ted)	0.2	118.80	35,329.50	WO HD	TR_____
11/06/19	8015306	Work with Receiver, counsel and Mr. Rodriguez concerning analysis of loan documents, receiver documents and research validating enforceability of loan terms and follow-up (1.1); Several emails and call with Receiver and counsel related to loans/agreements and the strategy to address lender claims (.8).	Zaro, David	1.9	1,496.25	36,825.75	WO HD	TR_____
11/06/19	8013389	Advise on responses to unique investor inquiries.	Fates, Edward (Ted)	0.2	118.80	36,944.55	WO HD	TR_____
11/06/19	8014182	Analyze notice requirements for nonparties subject to blanket stays in receivership actions.	Williams, Rebecca	4.0	1,206.00	38,150.55	WO HD	TR_____
11/07/19	8016607	Work on draft of the Receiver's monthly update, revise same, follow-up emails re same.	Zaro, David	1.4	1,102.50	39,253.05	WO HD	TR_____
11/07/19	8014349	Discuss updates to receivership website and responses to inquiries from investor with Receiver (.3) revisions to monthly case update to investors (1.8)	Fates, Edward (Ted)	2.1	1,247.40	40,500.45	WO HD	TR_____

Trans Date	Index	Description of Service Rendered	Timekeeper	Hours	Fees	Sum	Circle Action
11/07/19	8017089	Review and transmit letter to C. Campos of ProFrame, Inc. (.3).	Aspis, Norman	0.3	121.50	40,621.95	WO HD TR_____
11/08/19	8020188	Call with Receiver and counsel concerning proposed claims process (.3). Call with investor Williamson related to claims/CTC (.2). Call with investor/transfer of funds, timing/stay, follow-up with counsel re same (.3).	Zaro, David	0.8	630.00	41,251.95	WO HD TR_____
11/08/19	8020215	Revise monthly updatet to investors and creditors, advice to Receiver.	Zaro, David	0.3	236.25	41,488.20	WO HD TR_____
11/08/19	8016111	Revisions to monthly update to investors regarding new class action complaint filed (.7); discuss same with Receiver (.1).	Fates, Edward (Ted)	0.8	475.20	41,963.40	WO HD TR_____
11/11/19	8023987	Analysis of the TIC interest in the 804 San Rafael property and related option/loan agreement, advice to Receiver/counsel re same (.4).	Zaro, David	0.4	315.00	42,278.40	WO HD TR_____
11/11/19	8023991	Call with Receiver, follow-up on the First Choice loan, the FF&E auction.	Zaro, David	0.2	157.50	42,435.90	WO HD TR_____
11/11/19	8019404	Analyze issues regarding J. Lance ownership interest and claims in 809 and 812 San Rafael (1.1); discuss same with Receiver (.4); communications with J. Lance regarding same (.4).	Fates, Edward (Ted)	1.9	1,128.60	43,564.50	WO HD TR_____
11/12/19	8024022	Analysis of draft spreadsheet and report/evaluation of lender claims/mortgages and conference with Receiver and counsel.	Zaro, David	0.6	472.50	44,037.00	WO HD TR_____
11/12/19	8090345	Email/call with counsel/Receiver related to prospective intervenor	Zaro, David	0.3	236.25	44,273.25	WO HD TR_____

Trans Date	Index	Description of Service Rendered	Timekeeper	Hours	Fees	Sum	Circle Action
		letter.					
11/12/19	8021469	Analyze correspondence and documents provided by counsel for Caldarelli investor group (.6); discuss same with Receiver (.2); assist Receiver in responding to media inquiries regarding monthly investor update (.8).	Fates, Edward (Ted)	1.6	950.40	45,223.65	WO HD TR_____
11/13/19	8024041	Several calls/email related to First Choice/Fireside claims, mitigation issues (.4). Email/call re Seattle Funding Group loan issues, claim and follow-up call with Receiver (.4). Emails to the counsel for landlord claimant and First Choice bank counsel related to mitigation issues/lease (.5).	Zaro, David	1.3	1,023.75	46,247.40	WO HD TR_____
11/13/19	8022619	Communications with J. Lance regarding claims related to 809 ad 812 San Rafael properties (.3); analyze issues regarding mechanic's lien on 301 D Street and advise Receiver regarding same (.6); initial work on letter to contractor regarding same (.3).	Fates, Edward (Ted)	1.2	712.80	46,960.20	WO HD TR_____
11/14/19	8027856	Emails with counsel for First Choice as to landlord claims/First Choice claims (.7). Review Seattle Funding Group emails and letters related to claims from SFG (.6). Conference with SFG counsel/follow-up to address loans/payment, revise draft letter (.6). Emails with claimant as to \$500k investment, timing and administrative claims (.4).	Zaro, David	2.3	1,811.25	48,771.45	WO HD TR_____

Trans Date	Index	Description of Service Rendered	Timekeeper	Hours	Fees	Sum	Circle Action
11/14/19	8023462	Advise on issues and strategy regarding First Choice claims and personal property at Fireside location (.4); call/emails with counsel for Axos Bank regarding conflict waiver issue (.4); analyze draft conflict waiver letters (.2); call/emails with counsel for Proframe regarding mechanic's lien on 301 D Street and issues relating to same (.5); advise Receiver regarding same (.2).	Fates, Edward (Ted)	1.7	1,009.80	49,781.25	WO HD TR_____
11/15/19	8024712	Respond to direct inquiry from trade creditor (.2); revise letter to mechanic's lien claimant regarding 301 D Street (.2); revise conflict waiver letter regarding counsel for Axos bank, discuss same with Receiver and counsel for Axos (.6); analyze letter from TriCorp regarding mechanic's lien rights and overall strategy for mechanic's liens on 301 D Street (.5); confer with SEC counsel regarding same (.3); revisions to letter to SFG regarding reservation of rights and document preservation (.3); analyze issues as to First Choice Bank line on Bandini property and discuss same with Receiver and SEC counsel (.3); call/emails from counsel for secured creditor Symetra regarding loan and 11/18 hearing (.3).	Fates, Edward (Ted)	2.7	1,603.80	51,385.05	WO HD TR_____
11/15/19	8040081	Prepare letters to various recipients regarding mechanic's liens and investments (1.6).	Aspis, Norman	1.6	648.00	52,033.05	WO HD TR_____

Trans Date	Index	Description of Service Rendered	Timekeeper	Hours	Fees	Sum	Circle Action
11/18/19	8029458	Call with investor claimant concerning claims process and recovery (.3). Several emails and calls related to the First Choice email re Fireside FF&E, turnover, lien claims (.6).	Zaro, David	0.9	708.75	52,741.80	WO HD TR_____
11/18/19	8026345	Respond to direct inquiries from former employee regarding unpaid PTO.	Fates, Edward (Ted)	0.3	178.20	52,920.00	WO HD TR_____
11/19/19	8031955	Follow-up on SBA loan lien claim of First Choice, deposit account and credit card receipts (.4). Address the SBA lien claims with the Receiver (.2). Email to lender claimant as to lien claims, follow-up to address security interest (.3). Work on landlord/possession and claims issues, draft letters (.7).	Zaro, David	1.6	1,260.00	54,180.00	WO HD TR_____
11/19/19	8027674	Analyze issues raised in further correspondence from G. Aguirre (.2); call with W. Caldarelli regarding investor concerns relating to Receiver use of funds to be turned over and potential resolution of same (.7); advise Receiver regarding same (.3); communications with Receiver and SEC counsel regarding investor contact list, protective order, and related concerns (.6); address issues regarding mechanic's liens on 301 D Street (.2); communications with ANI outside counsel regarding same (.1).	Fates, Edward (Ted)	2.1	1,247.40	55,427.40	WO HD TR_____
11/20/19	8032009	Email/call related to Fireside lender and landlord claims with Receiver and with counsel for LL/claimant (.4). Several calls with counsel and	Zaro, David	2.4	1,890.00	57,317.40	WO HD TR_____



Trans Date	Index	Description of Service Rendered	Timekeeper	Hours	Fees	Sum	Circle	Action
		Receiver re sale of FF&E, license to satisfy claims (.3). Call with Receiver related to Goldfinch FF&E and claims of landlord/review email (.3). Analysis of mechanic's lien claims, letters/emails and the legal issues re recording and filing of actions, and Receiver's proposed strategy (.8). Call with Receiver re mechanic's lien claims (.2). Letter to counsel and landlord related to the claims (.4).						
11/20/19	8029309	Call with counsel for Ovation/Banc of California regarding Receiver's use of funds turned over by Chicago Title and related issues (.4); advise on issues relating to 301 D Street mechanic's lien and potential joint motion to address same (.3); calls with SEC counsel regarding protective order covering investor contact information and potential opt out provision for same (.5); discuss same with Receiver (.2); calls with W. Caldarelli and M. Kirby regarding potential agreement concerning Receiver's use of funds turned over by Chicago Title, potential opt out for investors regarding sharing of contact information (.9); review and revise summary of potential agreement terms and discuss with Receiver (.5).	Fates, Edward (Ted)	2.8	1,663.20	58,980.60	WO HD	TR_____
11/21/19	8032944	Assess outline of the stipulation addressing mechanic's lien issues related to D.Street, call with counsel for G.C., follow-up work on the coordination of lien claimants (.7).	Zaro, David	1.1	866.25	59,846.85	WO HD	TR_____

Trans Date	Index	Description of Service Rendered	Timekeeper	Hours	Fees	Sum	Circle	Action
		Emails with several lenders, follow-up on insurance issues, follow-up on the payment issues (.4).						
11/21/19	8032981	Analysis of issues related to draft stipulation concerning use of investor proceeds and advice re revisions to agreement (.4). Email/call with counsel related to CTC turnover and use of proceeds, Aguirre emails and opposition (.3).	Zaro, David	0.7	551.25	60,398.10	WO	HD TR_____
11/21/19	8030288	Work on revisions to proposed terms of stipulation/joint motion regarding Receiver's use of funds turned over by Chicago Title (.9); discuss same with Receiver (.4); communications with W. Caldarelli regarding same (.7); communications with SEC counsel regarding same (.3); analyze and respond to communications from J. Lance regarding claims related to San Rafael properties (.4).	Fates, Edward (Ted)	2.7	1,603.80	62,001.90	WO	HD TR_____
11/22/19	8033486	Call with counsel/emails and letter related to landlord claims/lender claims-payments (.4). Call with Receiver related to lender payment (.2).	Zaro, David	0.6	472.50	62,474.40	WO	HD TR_____
11/22/19	8033489	Several emails/call with Receiver and counsel to address the court's order as to the order in aid, turnover of funds, negotiation with investor counsel (.4).	Zaro, David	0.4	315.00	62,789.40	WO	HD TR_____
11/22/19	8031421	Discuss issues relating to Receiver's use of funds turned over by Chicago Title and sharing of ANI documents	Fates, Edward (Ted)	1.1	653.40	63,442.80	WO	HD TR_____

Trans Date	Index	Description of Service Rendered	Timekeeper	Hours	Fees	Sum	Circle	Action
		with counsel for putative investor class (.4); discuss same with counsel for Ovation and Banc of California (.2); communications with W. Caldarelli regarding investors request for production of documents (.5).						
11/25/19	8039218	Letter to counsel for Lewis related to the mechanic's lien, complaint claims arising out of construction and finalize letter (.9). Emails with counsel related to the mechanic's lien issues (.4).	Zaro, David	1.3	1,023.75	64,466.55	WO HD	TR_____
11/25/19	8033483	Analyze issues raised in communications with W. Caldarelli regarding proposed stipulation for Receiver's use of funds turned over by Chicago Title (.2); discuss same with Receiver (.3); address issues raised in communications from counsel for ANICO regarding Hancock Street property (.2); discuss same with Receiver (.1).	Fates, Edward (Ted)	0.8	475.20	64,941.75	WO HD	TR_____
11/26/19	8039569	Review of email and draft of SEC protective order, associated briefing and the call/email with counsel and Receiver as to investor information (.7).	Zaro, David	0.7	551.25	65,493.00	WO HD	TR_____
11/26/19	8034067	Analyze issues regarding draft protective order and joint motion provided by SEC counsel (.4); discuss same with Receiver (.2); call with W. Calderelli to discuss potential stipulation/joint motion regarding use of funds turned over, request for access to ANI documents, protective order and investor list, and related	Fates, Edward (Ted)	2.6	1,544.40	67,037.40	WO HD	TR_____

Trans Date	Index	Description of Service Rendered	Timekeeper	Hours	Fees	Sum	Circle	Action
		issues (1.1); discuss same with Receiver (.4); follow up communications with W. Caldarelli (.4); review additional investor opt-out request (.1).						
11/27/19	8039703	Several emails/calls related to investor counsel's proposal for joint stipulation/motion as to CTC turnover of funds (.6).	Zaro, David	0.6	472.50	67,509.90	WO	HD TR_____
11/27/19	8035488	Analyze issues raised in notice of default from counsel for Symetra (.2); discuss terms of potential stipulation/joint motion with Receiver (.3); communications with W. Caldarelli regarding same (.3); discuss issues regarding Axos loan and prepayment penalties with Receiver (.3); communications with Receiver and counsel for ANICO regarding Hancock Street property (.3); analyze draft joint motion from W. Caldarelli, advise Receiver regarding same (.6); analyze issues regarding claim filed by former employee with labor commissioner (.2); confer with SEC counsel regarding issues relating to protective order for investor contact list (.2).	Fates, Edward (Ted)	2.4	1,425.60	68,935.50	WO	HD TR_____
12/02/19	8043879	Work on draft of motion, stipulation related to the CTC funds, waiver-release issues and revisions, call with Receiver/counsel (.8). Further revisions, advice to counsel and to the Receiver related to the CTC issues and stipulation (.6).	Zaro, David	1.4	1,102.50	70,038.00	WO	HD TR_____

Trans Date	Index	Description of Service Rendered	Timekeeper	Hours	Fees	Sum	Circle Action
12/02/19	8040404	Analyze issues raised in further correspondence from G. Aguirre (.2); discuss same with Receiver (.1); revisions to draft joint motion regarding Receiver's use of funds turned over and other issues (1.1); discuss same with Receiver (.4); confer with SEC counsel regarding same, G. Aguirre correspondence, and protective order (.3); communications with W. Caldarelli regarding draft joint motion (.7); work on sample certification for protective order (.2); communications with Dept. of Labor regarding stay of claim asserted by former employee (.4); communications with Receiver regarding execution of Patio 101 PSA and lease amendment (.2); advise Receiver regarding receivership website updates (.2).	Fates, Edward (Ted)	3.8	2,257.20	72,295.20	WO HD TR_____
12/03/19	8043900	Analysis of letter/records re: BankDirect Funding/Era Boutique Hotel, Champion-Cain policy (.4). Work on the draft of the joint stipulation concerning mechanic's lien and actions related to D Street (1.20). Emails/call concerning the Fireside landlord claims (.5).	Zaro, David	1.7	1,338.75	73,633.95	WO HD TR_____
12/03/19	8041258	Communications with SEC counsel regarding terms of proposed protective order (.3); analysis of claims and initial work on settlement letter to J. Lance regarding resolution of TIC ownership claims to San Rafael properties (.9); conference call	Fates, Edward (Ted)	2.7	1,603.80	75,237.75	WO HD TR_____

Trans Date	Index	Description of Service Rendered	Timekeeper	Hours	Fees	Sum	Circle	Action
		with Receiver and counsel for ANICO regarding loans, collateral properties, and related issues (1.2); analyze issues raised in motion to withdraw by G. Aguirre, advise Receiver regarding same (.3).						
12/04/19	8042869	Analyze issues regarding draft stipulation to address mechanic's lien claimants (.6); analyze issues regarding Ultimate Software vendor billing/claim (.9); discuss same with Receiver (.4); communications with ANI in-house counsel regarding same (.5); respond to inquiries from counsel for creditor regarding claims and distribution approval process (.6); communications with W. Caldarelli regarding revisions to draft joint motion (.6); communications with counsel representing investors regarding issues with access to ANI documents (.3); discuss issues with employee labor claim with Receiver (.2).	Fates, Edward (Ted)	4.1	2,435.40	77,673.15	WO	HD TR_____
12/05/19	8048587	Several emails re Fireside matter and Receiver's interests versus the landlord/secured creditor.	Zaro, David	0.4	315.00	77,988.15	WO	HD TR_____
12/05/19	8045174	Confer with counsel for putative investor class regarding issues with ANI documents (.2); communications with W. Caldarelli regarding same (.1); communications with counsel for CalPrivate Bank regarding claims of security interests and priority (.2); communications with counsel representing investor groups	Fates, Edward (Ted)	1.1	653.40	78,641.55	WO	HD TR_____

Trans Date	Index	Description of Service Rendered	Timekeeper	Hours	Fees	Sum	Circle Action
		regarding joint motion regarding Receiver's use of funds turned over (.6).					
12/06/19	8048608	Further analysis and call with Receiver re Fireside landlord claim (.2).	Zaro, David	0.2	157.50	78,799.05	WO HD TR_____
12/06/19	8046007	Analyze proposed revisions to joint motion from counsel for putative investor class, discuss same with Receiver (.6); communications with SEC counsel regarding joint motion relating to mechanic's lien claimants for 301 D Street (.3).	Fates, Edward (Ted)	0.9	534.60	79,333.65	WO HD TR_____
12/09/19	8047510	Review draft joint motion/protective order and revisions thereto regarding investor access to ANI documents and protective order regarding same (.4); work on revisions to same (.9); discuss same with Receiver and counsel for Champion-Cain (.3); communications with Receiver and counsel for investor groups regarding final revisions to draft joint motion regarding Receiver use of funds turned over (.7); analyze issues regarding investor list and discuss same with Receiver (.4).	Fates, Edward (Ted)	2.7	1,603.80	80,937.45	WO HD TR_____
12/10/19	8050541	Email with Bank Direct related to the stipulation concerning the enforcement of the lien on Champion-Cain policy (.4). Evaluate the claims of landlord, defenses to the administrative claims and email with secured lender as to Fireside (.4).	Zaro, David	0.8	630.00	81,567.45	WO HD TR_____

Trans Date	Index	Description of Service Rendered	Timekeeper	Hours	Fees	Sum	Circle Action
12/10/19	8049271	Discuss joint motion regarding Receiver use of funds and related issues with counsel for Chicago Title (.3); call with counsel for CalPrivate Bank regarding claimed security interest, asset sales, and related issues (.6); communications with W. Caldarelli regarding joint motion concerning ANI documents (.1); follow up regarding draft joint motion concerning mechanic's liens claims (.1).	Fates, Edward (Ted)	1.1	653.40	82,220.85	WO HD TR_____
12/11/19	8053640	Several emails, follow-up call with counsel, review documents re Goldfinch transaction to resolve landlord's claim (.4). Emails re Fireside lender sale of assets to satisfy claims (.2).	Zaro, David	0.6	472.50	82,693.35	WO HD TR_____
12/12/19	8052291	Discuss request for ANI documents from investors and draft joint motion/protective order regarding same with Receiver (.8); revisions to monthly update to investors for receivership website (.7); discuss same with Receiver (.2); call with W. Caldarelli and B. Galdsten regarding joint motion concerning sharing of ANI-related documents, protective order, and related issues (.6); analyze proposed forbearance agreement from Symetra and advise Receiver regarding same (.3).	Fates, Edward (Ted)	2.6	1,544.40	84,237.75	WO HD TR_____
12/13/19	8053004	Analyze revisions to joint motion/protective order regarding investors' requests for documents	Fates, Edward (Ted)	1.5	891.00	85,128.75	WO HD TR_____



Trans Date	Index	Description of Service Rendered	Timekeeper	Hours	Fees	Sum	Circle	Action
		(.3); discuss same with Receiver (.2); communications with counsel for Champion-Cain regarding same (.1); advise Receiver on Symetra loan, default interest, and related issues (.3); analyze and advise on issues regarding Labor Dept. claim asserted by former employee (.3); revisions to monthly update to investors, discuss same with Receiver (.3).						
12/16/19	8062488	Call with Receiver concerning the issues related to Mr. Lance's claim (.4). Call with lender counsel (.2).	Zaro, David	0.6	472.50	85,601.25	WO HD	TR_____
12/16/19	8054503	Analyze issues raised in further correspondence from G. Aguirre, advise Receiver regarding same (.4); initial work on response to labor claim made by former employee (.2); advise Receiver on issues and strategy for potential settlement of J. Lance claims (.6); address issues with draft Joint Motion regarding ANI documents (.4); communications with SEC counsel and W. Caldarelli regarding same (.2); communications with W. Caldarelli and B. Galdston regarding same (.1); communications with Receiver and counsel for ANICO regarding issues with loans, default interest and prepayment penalties (.4); address issues regarding mechanic's lien recording on 301 D Street (.2).	Fates, Edward (Ted)	2.5	1,485.00	87,086.25	WO HD	TR_____
12/17/19	8056117	Advise Receiver regarding Axos loan issues and timing concerns (.5); calls with counsel for ANICO regarding	Fates, Edward (Ted)	2.7	1,603.80	88,690.05	WO HD	TR_____

Trans Date	Index	Description of Service Rendered	Timekeeper	Hours	Fees	Sum	Circle Action
		loan terms, prepayment penalties, and related issues (.8); discuss same with Receiver (.4); analyze G. Aguirre filing regarding withdrawal and Court order on same (.1); analyze accounting from Receiver regarding J. Lance claims and discuss with Receiver (.6); communications with counsel for CalPrivate Bank regarding responses to pending motions to reserve rights (.2); revisions to letter to counsel for M. Spicer (.2).					
12/18/19	8057218	Analyze issues raised in Edelman Investors opposition to Joint Motion regarding Receiver use of funds (.4); discuss same with Receiver (.2); communications with W. Caldarelli (.2); work on settlement letter to J. Lance (1.3); discuss same with Receiver (.2); work on response to Edelman Investors opposition (1.4); discuss issues related to Symetra loan with Receiver (.2); communications with SEC counsel regarding Chicago Title response to Joint Motion regarding access to ANI-related documents (.3); advise Receiver regarding same (.3).	Fates, Edward (Ted)	4.5	2,673.00	91,363.05	WO HD TR_____
12/19/19	8062540	Review/evaluate the ANICO intervention motion and complaint (.6). Work on the draft of the opposition to intervention motion (2.6).	Zaro, David	3.2	2,520.00	93,883.05	WO HD TR_____
12/19/19	8062542	Work on issues related to the joint motion re held funds (.6). Address opposition by Edelman, then revise	Zaro, David	1.3	1,023.75	94,906.80	WO HD TR_____

Trans Date	Index	Description of Service Rendered	Timekeeper	Hours	Fees	Sum	Circle Action
		draft reply (.5). Emails related to CTC dispute re joint motion (.2).					
12/19/19	8058925	Revisions to reply regarding Edelman Investors opposition to Joint Motion (.6); discuss same with Receiver (.3); advise on issues regarding mechanic's lien on Keller Street (.2); calls with SEC counsel and Chicago Title counsel regarding Joint Motion regarding ANI documents (.6); discuss same with Receiver (.2); analyze Chicago Title proposed revisions to Joint Motion (.3); call/emails with B. Galdston and C. Mackler regarding same (.7); advise Receiver regarding same and further revisions (.4).	Fates, Edward (Ted)	3.3	1,960.20	96,867.00	WO HD TR_____
12/20/19	8065464	Analysis of lender claims concerning the secured loans/pre-payment and call with Receiver (.3). Analysis of letter from Kirby & Associate records re SFG docs, call with counsel (.6). Emails related to the Bank Direct loan and stipulation/joint motion (.3).	Zaro, David	1.2	945.00	97,812.00	WO HD TR_____
12/20/19	8061494	Call/emails with W. Caldarelli and B. Galdston regarding revisions to Joint Motion regarding ANI documents (.7); advise Receiver regarding same (.1); advise Receiver on issues regarding Symetra loan (.3); communications with counsel for Symentra regarding same (.2); advise Receiver on issues regarding Axos portfolio loan and communications regarding same (.6); discuss categories of documents for informal sharing with Receiver (.8);	Fates, Edward (Ted)	3.4	2,019.60	99,831.60	WO HD TR_____

Trans Date	Index	Description of Service Rendered	Timekeeper	Hours	Fees	Sum	Circle Action
		analyzed proposed supplemental Joint Motion regarding ANI documents (.4); discuss same with Receiver (.2); review order setting hearing on Joint Motion regarding ANI documents and advise Receiver regarding same (.1).					
12/23/19	8065822	Call with Receiver related to ANICO/intervention and claims issues, follow-up as to pre-payment/payoff issues (.4). Follow-up on the Symetra loan claim, email and review letter (.4). Work on revisions to the draft intervention brief (1.2). Revise draft of Bank Direct joint stipulation re relief (.6).	Zaro, David	2.6	2,047.50	101,879.10	WO HD TR_____
12/23/19	8063611	Confer with SEC counsel regarding Court's concern with Joint Motion regarding ANI documents and next steps regarding same (.4); discuss same with Receiver (.1); communications with counsel for investors and counsel for Chicago Title regarding same (.2); discuss Symetra loan issues with Receiver (.2); call with counsel for Symetra regarding same (.2); advise Receiver regarding former employee labor claim (.1).	Fates, Edward (Ted)	1.2	712.80	102,591.90	WO HD TR_____
12/26/19	8065576	Emails/call with counsel for ANICO (.3); advise Receiver regarding same and issues regarding Symetra loan (.3); analyze and advise Receiver regarding Edelman motion to correct opposition to Joint Motion (.2).	Fates, Edward (Ted)	0.8	475.20	103,067.10	WO HD TR_____

Trans Date	Index	Description of Service Rendered	Timekeeper	Hours	Fees	Sum	Circle Action
12/27/19	8067137	Call with Receiver related to the ANICO and Symetra loan claims (.4). Receiver emails/analysis of issues related to ANICO, call with counsel and then email to Receiver (.4). Analysis of the Receiver's Symetra lender claim/email advice to Receiver following call (.4).	Zaro, David	1.2	945.00	104,012.10	WO HD TR_____
12/27/19	8065860	Advise on negotiations as to ANICO and Symetra loan terms.	Fates, Edward (Ted)	0.3	178.20	104,190.30	WO HD TR_____
12/29/19	8067172	Analysis of the loan and default claims, issues concerning the ANICO loan, reinstatement terms (.4). Call with Receiver related to the ANICO loans, the SFG loan (.4). Analysis of the SFG laons as to University and West Washington properties, reinstatement and follow-up with Receiver re same (.6).	Zaro, David	1.4	1,102.50	105,292.80	WO HD TR_____
12/30/19	8070086	Emails related to the loans/strategy concerning repayment (.3). Email/call related to AXOS Bank loan terms and claims (.4. Call with Receiver and follow-up re ANICO loan/reinstatement (.4).	Zaro, David	1.1	866.25	106,159.05	WO HD TR_____
12/30/19	8067864	Advise Receiver regarding issues with ANICO loan terms and resolution of same (.4) call with counsel for Chicago Title regarding issues relating to Joint Motion regarding ANI documents (.2) advise Receiver regarding same (.2).	Fates, Edward (Ted)	0.8	475.20	106,634.25	WO HD TR_____
12/31/19	8070189	Emails/analysis of First Choice loan/collateral and follow-up advice to	Zaro, David	0.4	315.00	106,949.25	WO HD TR_____

Trans Date	Index	Description of Service Rendered	Timekeeper	Hours	Fees	Sum	Circle Action
		Receiver concerning loan reinstatement and payments.					
12/31/19	8070204	Review the SEC opposition to ANICO claim for intervention (.2). Email/follow-up as to lender claims/reinstatement issues (.6).	Zaro, David	0.8	630.00	107,579.25	WO HD TR_____

Proforma Summary

Timekeeper Number	Timekeeper	Hours	Rate	Amounts
000313	David Zaro	64.8	787.50	51,030.00
000739	Michael Farrell	0.7	715.50	500.85
001665	Edward (Ted) Fates	89.6	594.00	53,222.40
002348	Rebecca Williams	4.0	301.50	1,206.00
002369	Norman Aspis	4.0	405.00	1,620.00
		163.1		107,579.25
Total Fees				107,579.25
Total Disbursements				0.00

Attorney Billing Instructions

( )

BILL ALL

( )

BILL FEES ONLY

( )

BILL COST ONLY

( )

Hold

( )

Write Off

( )

Transfer All

Billing Instructions

expires 6/30/2020: 10% off standard rates (automatic); no text editing; copies @ .10

Account Summary- As Of 12/31/2019

Fiscal YTD				Calendar YTD			LTD		
	Total	Fees	Disbursement	Total	Fees	Disbursement	Total	Fees	Disbursement
Worked	107,588.25	107,579.25	9.00	107,588.25	107,579.25	9.00	107,588.25	107,579.25	9.00
Unbilled Adj	(9.00)	0.00	(9.00)	(551.25)	(551.25)	0.00	(560.25)	(551.25)	(9.00)

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
	<b>Total</b>	<b>Fees</b>	<b>Cost</b>						
<b>WIP Balance</b>	<b>147,376.35</b>	<b>147,376.35</b>	<b>0.00</b>						
<b>AR Balance</b>	<b>0.00</b>	<b>0.00</b>	<b>0.00</b>						
<b>Unalloc Payment</b>	<b>0.00</b>								
<b>Client Trust Balance</b>	<b>0.00</b>								

### Billing Address

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

02/14/20 10:00:51 PROFORMA STATEMENT FOR MATTER 378827-00008 (Krista Freitag, as Receiver for ANI Development, LLC, et al.) (SEC v. Champion-Cain - Pending Litigation)

### **Preliminary Billing Form**

Billing Atty: 001665 - Edward Fates

Matter #: 378827-00008

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

Date of Last Billing:

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

Proforma Number 1456091

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
09/04/19	7948513	Meetings with Receiver, Champion-Cain, her counsel, and ANI in-house counsel to discuss pending and threatened legal actions, unpaid rent obligations, and business disputes (.9); analyze and advise Receiver on strategy for ANI leases in default and landlord actions/claims (.5).	Fates, Edward (Ted)	1.4	831.60	831.60	WO HD TR_____
09/05/19	7948557	Confer with Receiver and counsel re: response to 3-day notice from landlord for Patio restaurant (.4); discuss pending claims by former employees and dispute over Swell trademark with ANI in-house counsel (.5); communications with ANI outside counsel re: pending employee claims (.4).	Fates, Edward (Ted)	1.3	772.20	1,603.80	WO HD TR_____
09/09/19	7952099	Communications with Receiver and various ANI counsel regarding pending litigation matters (.6); revisions to notice of stay in pending employment case (.3).	Fates, Edward (Ted)	0.9	534.60	2,138.40	WO HD TR_____
09/10/19	7954748	Analysis of the issues related to the Westlink/SunTrust Bank	Zaro, David	1.8	1,417.50	3,555.90	WO HD TR_____



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Trans Date	Index	Description of Service Rendered	Timekeeper	Hours	Fees	Sum	Circle	Action
		communications with counsel for investor group regarding action filed against Champion-Cain and former ANI employees (.4); advise Receiver regarding same (.1).						
10/16/19	7992718	Emails/call concerning the Suntrust litigation.	Zaro, David	0.4	315.00	5,831.10	WO	HD TR_____
10/16/19	7990970	Communications with ANI outside litigation counsel regarding pending action in FL against SunTrust Bank.	Fates, Edward (Ted)	0.2	118.80	5,949.90	WO	HD TR_____
10/17/19	7994806	Analysis of the 3rd Party claims as to Suntrust and meeting with counsel (.8); Calls with litigation counsel and Receiver counsel as to case transition and strategy (.7); Emails to client receiver related to Suntrust matter/follow-up (.5).	Zaro, David	2.0	1,575.00	7,524.90	WO	HD TR_____
10/17/19	7991900	Analyze issues and strategy for FL litigation with SunTrust Bank (.2); conference call with outside litigation counsel regarding same issues with co-plaintiffs (.5).	Fates, Edward (Ted)	0.7	415.80	7,940.70	WO	HD TR_____
10/18/19	7993321	Attend status conference in pending Luu employment action.	Fates, Edward (Ted)	0.6	356.40	8,297.10	WO	HD TR_____
10/21/19	7998529	Follow-up on the issues related to the Suntrust case, receiver's strategy, email/call with counsel.	Zaro, David	0.5	393.75	8,690.85	WO	HD TR_____
10/21/19	7994622	Communications with outside litigation counsel in FL regarding SunTrust litigation.	Fates, Edward (Ted)	0.2	118.80	8,809.65	WO	HD TR_____
10/22/19	8012258	Legal analysis and call with counsel/Receiver regarding the	Zaro, David	0.4	315.00	9,124.65	WO	HD TR_____

Trans Date	Index	Description of Service Rendered	Timekeeper	Hours	Fees	Sum	Circle	Action
		Suntrust matter (.4).						
10/22/19	7996442	Conference call with ANI outside litigation counsel on Westlink matter (.7); discuss same and strategy for litigation with Receiver (.4).	Fates, Edward (Ted)	1.1	653.40	9,778.05	WO HD	TR_____
10/28/19	8012209	Emails re Westlink, joint defense agreement and advice to counsel re same (.2).	Zaro, David	0.2	157.50	9,935.55	WO HD	TR_____
10/28/19	8002064	Review Joint Litigation Agreement in SunTrust case and advise Receiver on same.	Fates, Edward (Ted)	0.4	237.60	10,173.15	WO HD	TR_____
10/31/19	8006219	Communications with local counsel in FL re: next steps for SunTrust litigation	Fates, Edward (Ted)	0.3	178.20	10,351.35	WO HD	TR_____
11/07/19	8014340	Communications with local counsel in FL regarding SunTrust case strategy	Fates, Edward (Ted)	0.2	118.80	10,470.15	WO HD	TR_____
11/13/19	8022613	Communications with Receiver and local counsel in FL regarding SunTrust litigation.	Fates, Edward (Ted)	0.4	237.60	10,707.75	WO HD	TR_____
11/14/19	8023713	Call/emails with Receiver and local counsel in FL regarding contingent fee agreement, cost reimbursement issues and next steps in SunTrust Litigation.	Fates, Edward (Ted)	0.6	356.40	11,064.15	WO HD	TR_____
11/26/19	8035168	Communications with local counsel in FL regarding SunTrust matter.	Fates, Edward (Ted)	0.2	118.80	11,182.95	WO HD	TR_____
12/06/19	8045841	Initial review of budget for litigation costs and revisions to engagement agreement for local counsel in FL for SunTrust matter.	Fates, Edward (Ted)	1.1	653.40	11,836.35	WO HD	TR_____
12/10/19	8049276	Analyze issues regarding	Fates, Edward (Ted)	0.5	297.00	12,133.35	WO HD	TR_____

Trans Date	Index	Description of Service Rendered	Timekeeper	Hours	Fees	Sum	Circle	Action
		engagement of local counsel in FL and budget for costs for SunTrust matter (.3); communications with local counsel regarding analysis of potential damages recoverable (.2).						
12/11/19	8051138	Analyze information for local counsel in FL regarding damage claims in SunTrust litigation.	Fates, Edward (Ted)	0.2	118.80	12,252.15	WO	HD TR_____
12/12/19	8052293	Discuss proposed engagement agreement, estimate of costs, damages, and potential motion for authority to engage local counsel in FL for SunTrust case with Receiver (.4); communications with local counsel in FL regarding same (.2).	Fates, Edward (Ted)	0.6	356.40	12,608.55	WO	HD TR_____
12/17/19	8055930	Call with local counsel in FL regarding strategy, next steps, and potential engagement terms (.5); advise Receiver regarding same (.4).	Fates, Edward (Ted)	0.9	534.60	13,143.15	WO	HD TR_____

Proforma Summary

Timekeeper Number	Timekeeper	Hours	Rate	Amounts
000313	David Zaro	5.3	787.50	4,173.75
001665	Edward (Ted) Fates	15.1	594.00	8,969.40
		20.4		13,143.15
Total Fees				13,143.15
Total Disbursements				0.00

Attorney Billing Instructions

( )
BILL ALL

( )
BILL FEES ONLY

( )
BILL COST ONLY

( )
Hold

( )
Write Off

( )
Transfer All

### Billing Instructions

expires 6/30/2020: 10% off standard rates (automatic); no text editing; copies @ .10

### Account Summary- As Of 12/31/2019

Fiscal YTD				Calendar YTD			LTD		
	Total	Fees	Disbursement	Total	Fees	Disbursement	Total	Fees	Disbursement
Worked	13,143.15	13,143.15	0.00	13,143.15	13,143.15	0.00	13,143.15	13,143.15	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
	<b>Total</b>	<b>Fees</b>	<b>Cost</b>						
<b>WIP Balance</b>	<b>20,389.95</b>	<b>20,389.95</b>	<b>0.00</b>						
<b>AR Balance</b>	<b>0.00</b>	<b>0.00</b>	<b>0.00</b>						
<b>Unalloc Payment</b>	<b>0.00</b>								
<b>Client Trust Balance</b>	<b>0.00</b>								

### Billing Address

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

02/14/20 10:00:51 PROFORMA STATEMENT FOR MATTER 378827-00010 (Krista Freitag, as Receiver for ANI Development, LLC, et al.) (SEC v. Champion-CaiN - Bankruptcy Matters)

### ***Preliminary Billing Form***

Billing Atty: 001665 - Edward Fates

Matter #: 378827-00010

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

Date of Last Billing:

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

Proforma Number 1456092

Client/Matter Joint Group # 378827-1

#### **Fees for Matter 378827-00010 (SEC v. Champion-CaiN - Bankruptcy Matters)**

Trans Date	Index	Description of Service Rendered	Timekeeper	Hours	Fees	Sum	Circle	Action
09/13/19	7958730	Review involuntary bankruptcy petitions as to K. Peterson and Kim Funding (.4); advise Receiver regarding same (.2); prepare requests for special notice (.3).	Fates, Edward (Ted)	0.9	534.60	534.60	WO HD	TR_____
09/17/19	7959706	Communications with T. Hebrank regarding K. Peterson involuntary bankruptcy matters.	Fates, Edward (Ted)	0.2	118.80	653.40	WO HD	TR_____
10/18/19	7994246	Analyze and address emergency motions in Kim Funding and K. Peterson bankruptcies and orders setting status conferences.	Fates, Edward (Ted)	0.3	178.20	831.60	WO HD	TR_____
10/21/19	7998090	Review Bankruptcy Notice of Hearing for Kim Funding and Kim Peterson.	Kaup, John	0.1	29.25	860.85	WO HD	TR_____
10/22/19	8012195	Call with counsel as to issues related to the Kim Peterson BK and impact (.4).	Zaro, David	0.4	315.00	1,175.85	WO HD	TR_____
10/22/19	7996346	Analyze emergency motions filed in Kim Funding and Kim Peterson bankruptcy cases and advise Receiver regarding same (.7); respond to inquiries regarding same from counsel for US Trustee (.5).	Fates, Edward (Ted)	1.2	712.80	1,888.65	WO HD	TR_____

Trans Date	Index	Description of Service Rendered	Timekeeper	Hours	Fees	Sum	Circle Action
10/23/19	7998346	Attend Bankruptcy hearing re. Kim Funding and provide report on same.	Williams, Rebecca	1.0	301.50	2,190.15	WO HD TR_____
10/23/19	7998353	Summarize involuntary bankruptcy hearing notes.	Williams, Rebecca	0.4	120.60	2,310.75	WO HD TR_____
11/06/19	8012830	Analyze issues raised in Kim Funding bankruptcy related to discovery sought from Chicago Title by petitioning creditors and Chicago Title opposition to same.	Fates, Edward (Ted)	0.2	118.80	2,429.55	WO HD TR_____
11/08/19	8016928	Analyze order denying FRBP 2004 discovery in Kim Funding involuntary bankruptcy.	Fates, Edward (Ted)	0.2	118.80	2,548.35	WO HD TR_____
11/26/19	8035034	Analyze issues raised in filings in Kim Funding involuntary bankruptcy.	Fates, Edward (Ted)	0.2	118.80	2,667.15	WO HD TR_____
12/09/19	8048238	Analyze stipulations seeking extensions of time to respond to involuntary petitions.	Fates, Edward (Ted)	0.1	59.40	2,726.55	WO HD TR_____

### Proforma Summary

Timekeeper Number	Timekeeper	Hours	Rate	Amounts
000313	David Zaro	0.4	787.50	315.00
000820	John Kaup	0.1	292.50	29.25
001665	Edward (Ted) Fates	3.3	594.00	1,960.20
002348	Rebecca Williams	1.4	301.50	422.10
		<u>5.2</u>		<u>2,726.55</u>
Total Fees				2,726.55
Total Disbursements				0.00

### Attorney Billing Instructions

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

( ) BILL COST ONLY

( ) Transfer All

### Billing Instructions

expires 6/30/2020: 10% off standard rates (automatic); no text editing; copies @ .10

### Account Summary- As Of 12/31/2019

Fiscal YTD				Calendar YTD			LTD		
	Total	Fees	Disbursement	Total	Fees	Disbursement	Total	Fees	Disbursement
Worked	2,726.55	2,726.55	0.00	2,726.55	2,726.55	0.00	2,726.55	2,726.55	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
<b>Total</b>	<b>2,726.55</b>	<b>2,726.55</b>	<b>0.00</b>	<b>2,726.55</b>	<b>2,726.55</b>	<b>0.00</b>	<b>2,726.55</b>	<b>2,726.55</b>	<b>0.00</b>
<b>WIP Balance</b>	<b>2,964.15</b>	<b>2,964.15</b>	<b>0.00</b>						
<b>AR Balance</b>	<b>0.00</b>	<b>0.00</b>	<b>0.00</b>						
<b>Unalloc Payment</b>	<b>0.00</b>								
<b>Client Trust Balance</b>	<b>0.00</b>								

### Billing Address

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



02/14/20 10:00:51 PROFORMA STATEMENT FOR MATTER 378827-00010 (Klaus Freitag, as Receiver for ANI Development, LLC, et al.) (SEC v. Champion-CaiN - Bankruptcy Matters)

***Preliminary Billing Form***