

**IN THE CIRCUIT COURT OF THE FIFTEENTH JUDICIAL CIRCUIT
IN AND FOR PALM BEACH COUNTY, FLORIDA
CIVIL DIVISION**

STATE OF FLORIDA
OFFICE OF FINANCIAL REGULATION,

Plaintiff,

CASE NO.: 50-2021-CA-008718-XXXX-MB

v.

NATIONAL SENIOR INSURANCE, INC.
D/B/A SEEMAN HOLTZ,
MARSHAL SEEMAN,
CENTURION INSURANCE SERVICES GROUP, LLC,
BRIAN J. SCHWARTZ,
EMERALD ASSETS 2018, LLC,
INTEGRITY ASSETS 2016, LLC,
INTERGRITY ASSETS, LLC,
PARA LONGEVITY 2014-5, LLC,
PARA LONGEVITY 2015-3, LLC,
PARA LONGEVITY 2015-5, LLC,
PARA LONGEVITY 2016-3, LLC,
PARA LONGEVITY 2016-5, LLC,
PARA LONGEVITY 2018-3, LLC,
PARA LONGEVITY 2018-5, LLC,
PARA LONGEVITY 2019-3, LLC,
PARA LONGEVITY 2019-5, LLC,
PARA LONGEVITY 2019-6, LLC,
PARA LONGEVITY VI, LLC,
SH GLOBAL, LLC N/K/A PARA LONGEVITY V, LLC,
ALTRAI GLOBAL, LLC A/K/A ALTRAI HOLDINGS, LLC,
VALENTINO GLOBAL HOLDINGS, LLC,
AMERITONIAN ENTERPRISES, LLC,
SEEMAN-HOLTZ CONSULTING CORP.,
CENTURION ISG Holdings, LLC,
CENTURION ISG Holdings II, LLC,
CENTURION ISG (Europe) Limited,
CENTURION ISG SERVICES, LLC,
CENTURION ISG FINANCE GROUP, LLC,
CENTURION FUNDING SPV I LLC,
CENTURION FUNDING SPV II LLC,
GRACE HOLDINGS FINANCIAL, LLC,
PRIME SHORT TERM CREDIT INC.,

Defendants.

THE ESTATE OF ERIC CHARLES HOLTZ,

SEEMAN HOLTZ PROPERTY AND CASUALTY, LLC
F/K/A SEEMAN HOLTZ PROPERTY AND CASUALTY, INC.,
SHPC HOLDINGS I, LLC,

Relief Defendants.

**BERGER SINGERMAN LLP'S THIRD INTERIM MOTION
FOR COMPENSATION FOR PROFESSIONAL SERVICES AND
REIMBURSEMENT OF EXPENSES FOR THE PERIOD FROM
MAY 12, 2023, THROUGH SEPTEMBER 30, 2024**

Berger Singerman LLP (“**Berger Singerman**”) as counsel to the Court-appointed Receiver, Daniel J. Stermer (the “**Receiver**” and previously the “**Corporate Monitor**”)¹, files this third interim motion (the “**Third Interim Fee Motion**”) for the allowance and payment of compensation for professional services rendered and for the reimbursement of expenses for the period of **May 12, 2023, through September 30, 2024** (the “**Third Interim Period**”) pursuant to the *Agreed Order Granting Plaintiff’s Consent Motion for Appointment of Corporate Monitor and Related Injunctive Relief* dated September 14, 2021 (the “**Monitorship Order**”), the *Agreed Order Granting Corporate Monitor, Daniel J. Stermer’s Unopposed Motion for Approval of Employment of Berger Singerman LLP as Counsel to the Corporate Monitor, Effective as of September 14, 2021* dated September 18, 2021, and the *Order Appointing Receiver* dated May 12, 2023 (the “**Receivership Order**”)² authorizing the retention of Berger Singerman as counsel to the Corporate Monitor and now Receiver. This Third Interim Fee Motion requests approval of fees from **May 12, 2023, through September 30, 2024**. The Third Interim Fee Motion requests approval of fees in the amount of \$884,449.00,³ which has been voluntarily reduced from

¹ Capitalized terms not otherwise defined herein shall have the meaning ascribed to them in the motions referenced, the Reports (as defined herein) or papers filed in this case.

² The Receivership Order provides, at paragraph 8(w): “, , Any professionals previously approved by this Court to provide the Corporate Monitor with services shall be automatically engaged to continue to provide the Receiver with said services without the need for the filing of new applications to retain said professionals, namely Berger Singerman, LLP, Development Specialists, Inc., and e-Forensics, Inc.;

³ This reduced sum is being discussed with the Plaintiff and is expected to be reduced further by agreement of the parties to represent further accommodation amongst all professionals to reduce fees paid at this time and to allow the

\$1,000,966.00 and expenses in the amount of \$11,588.99 for a total fee and expense approval request in the amount of \$896,037.99 for services rendered by Berger Singerman as counsel to the Receiver during the Third Interim Period. Berger Singerman requests that the Court approve and allow all of the fees and expenses requested during the Third Interim Period, but is only requesting authorization for payment at this time of amount as agreed to of up to \$884,449⁴ in fees and \$11,588.99 in expenses during the Third Interim Period, with the remaining sums approved and allowed to be paid at a later date and subject to further Order of this Court. In addition to the request for fees and expenses incurred during the Third Interim Period, as set forth above and herein, Berger Singerman further requests the Court to authorize the payment of fees in the amount of \$153,483.62 to Berger Singerman, which sum represents the fees approved and awarded but not yet authorized to be paid to Berger Singerman, as requested in *Berger Singerman LLP's Second Interim Motion for Compensation for Professional Services and Reimbursement of Expenses For the Period From August 1, 2022, Through May 11, 2023* (the “**Second Interim Fee Motion**”) filed on October 10, 2023, and approved on November 4, 2023, pursuant to this Court’s *Order Granting Berger Singerman LLP’s Second Interim Motion for Compensation for Professional Services and Reimbursement of Expenses For the Period From August 1, 2022 Through May 11, 2023*.

Berger Singerman and the Receiver recognize and appreciate the hardship that this case has brought to the victims who have yet to receive any distributions in this matter. Further, this Third Application reflects time incurred and billed for approximately a year and half. In this complex and extensive matter, the amount of legal and investigatory work necessary is immense and time consuming. Similarly, while the restructuring professionals who handle these types of

retention of funds for distribution to noteholders and other creditors of the Receivership Estate.

⁴ The Receiver and his Professionals have been and continue to be in discussions with Plaintiff regarding the amount to be authorized for payment to the Receiver and his Professionals for amounts previously awarded but not yet authorized and/or to be awarded and authorized pursuant to the Third Interim Fee Motions of the Receiver and his Professionals. It is anticipated that reduced sum will be agreed to an announced at the hearing on this Motion, subject to Court approval of same.

matters everyday understand the time and effort required in a case such as this and how it can often take years for any prospect of recovery, we fully understand the perception that victims may have that things are too expensive and take too long. The Receiver and his professionals are attempting to be transparent and detailed in these Motions to provide as much information as possible to the Noteholders/victims and to the Court.

BACKGROUND

1. On July 12, 2021, the State of Florida, Office of Financial Regulation (hereinafter “**Plaintiff**” or “**OFR**”) filed a *Complaint for Temporary and Permanent Injunction, Appointment of Receiver, Restitution, Civil Penalties, and Other Statutory and Equitable Relief* (the “**Complaint**”) against thirty corporate defendants (collectively, the “**Corporate Defendants**”), two individual defendants, Marshal Seeman and Brian J. Schwartz (collectively, the “**Individual Defendants**” and, together with the Corporate Defendants, collectively, the “**Defendants**”) and three relief defendants (collectively, the “**Relief Defendants**”), seeking to restrain acts and practices of the Defendants and Relief Defendants in violation of various provisions of Chapter 517, Florida Statutes, including sections 517.301, 517.12 and 517.07, and “halt the securities fraud scheme and common enterprise operated and controlled by Defendant Marshal Seeman (“**Seeman**”) and Seeman’s recently deceased business partner, Eric Charles Holtz (“**Holtz**”).”

2. On September 9, 2021, the OFR filed its *Consent Motion for Appointment of Corporate Monitor and Related Injunctive Relief*, requesting the appointment of the Corporate Monitor for the property, assets, and business of the following twenty-seven corporate-entity defendants (the “**Consenting Corporate Defendants**” or “**Monitorship Entities**”), seeking a temporary injunction against the Consenting Corporate Defendants and against Seeman and Brian J. Schwartz (the “**Consenting Individual Defendants**”):

1. NATIONAL SENIOR INSURANCE, INC. D/B/A SEEMAN HOLTZ,
2. CENTURION INSURANCE SERVICES GROUP, LLC,

3. EMERALD ASSETS 2018, LLC,
4. INTEGRITY ASSETS 2016, LLC,
5. INTERGRITY ASSETS, LLC,⁵
6. PARA LONGEVITY 2014-5, LLC,
7. PARA LONGEVITY 2015-3, LLC,
8. PARA LONGEVITY 2015-5, LLC,
9. PARA LONGEVITY 2016-3, LLC,
10. PARA LONGEVITY 2016-5, LLC,
11. PARA LONGEVITY 2018-3, LLC,
12. PARA LONGEVITY 2018-5, LLC,
13. PARA LONGEVITY 2019-3, LLC,
14. PARA LONGEVITY 2019-5, LLC,
15. PARA LONGEVITY 2019-6, LLC,
16. PARA LONGEVITY VI, LLC,
17. SH GLOBAL, LLC N/K/A PARA LONGEVITY V, LLC,
18. VALENTINO GLOBAL HOLDINGS, LLC,
19. AMERITONIAN ENTERPRISES, LLC,
20. SEEMAN-HOLTZ CONSULTING CORP.,
21. CENTURION ISG Holdings, LLC,
22. CENTURION ISG Holdings II, LLC,
23. CENTURION ISG (Europe) Limited,
24. CENTURION ISG SERVICES, LLC,
25. CENTURION ISG FINANCE GROUP, LLC,
26. CENTURION FUNDING SPV I LLC, and
27. CENTURION FUNDING SPV II LLC.

3. On September 14, 2021, the Court entered the Monitorship Order, thereby approving and appointing, *inter alia*, Daniel J. Stermer as the Corporate Monitor for the Consenting Corporate Defendants and their affiliates, subsidiaries, successors, and assigns, until further order of the Court.

4. On January 6, 2022, the Court entered an *Agreed Order Granting Corporate Monitor, Daniel J. Stermer's Unopposed Motion to Expand Corporate Monitorship Estate*, thereby expanding the scope of the corporate monitorship to include the following five (5) additional corporate entities as Consenting Corporate Defendants/Monitorship Entities:

1. PARA GLOBAL 2019, LLC,
2. ALLOY ASSETS, LLC,
3. SEEMAN HOLTZ WEALTH MANAGEMENT, INC.,

⁵ “Integrity Assets, LLC” as used in the caption is defined in the Complaint as “Integrity Assets, LLC.” The Corporate Monitor has not identified any entity named “Integrity Assets, LLC” and therefore asserts the distinction is not a difference and rather a scrivener’s error.

4. AGENCY ACQUISITION FUNDING, LLC, and
5. AMERICA'S FAVORITE INSURANCE SERVICES LLC

5. On March 23, 2023, the Corporate Monitor filed a *Joint Motion to Appoint Receiver* (the “**Receiver Motion**”), which was filed jointly with the Plaintiff/OFR, seeking the entry of an order appointing the Corporate Monitor as receiver for the Consenting Corporate Defendants. The Receiver Motion was filed as it was the belief of the Corporate Monitor, with the consent of the OFR, that converting this monitorship into a receivership was necessary and appropriate to facilitate the wind up of the Consenting Corporate Defendants’ affairs, including the liquidation of assets, disposition and prosecution of claims, and to facilitate litigation against third-parties, which will benefit the investors, noteholders and creditors.

6. On May 10, 2023, the Court conducted a hearing to consider the Receiver Motion, and, on May 12, 2023, the Court entered the Receivership Order (as defined above), which appointed the Corporate Monitor as the Receiver of the Consenting Corporate Defendants and the Corporate Monitorship Estate (hereinafter the “**Receivership Estate**”).

7. On November 23, 2023, the Court entered an *Agreed Order Granting Receiver’s Unopposed Motion to Expand Receivership Estate to Include Grace Holdings*, thereby expanding the scope of the receivership to include Grace Holdings Financial LLC.

RETENTION OF BERGER SINGERMAN

8. Paragraph 13U of the Monitorship Order provides that the Corporate Monitor is authorized “[t]o choose, engage, and employ attorneys, accountants and other reasonable agents or professionals, as the Corporate Monitor deems advisable or necessary in the performance of the Corporate Monitor’s duties and responsibilities”, and that “[t]he Corporate Monitor and Corporate Monitor’s professionals shall be entitled to reasonable compensation from the assets now held by the Consenting Corporate Defendants or ultimately secured by the Corporate Monitor”, and that “[s]aid compensation shall be commensurate with their duties and obligations under the

circumstances, and subject to approval of this Court.”⁶

9. On September 17, 2021, the Corporate Monitor filed *Corporate Monitor, Daniel J. Stermer’s Unopposed Motion for Approval of Employment of Berger Singerman LLP as Counsel to the Corporate Monitor, Effective as of September 14, 2021* (the “**Retention Application**”), seeking the entry of an order authorizing the Corporate Monitor’s retention of Berger Singerman as his general counsel, effective as of September 14, 2021.

10. On September 18, 2021, the Court entered an *Agreed Order Granting Corporate Monitor, Daniel J. Stermer’s Unopposed Motion for Approval of Employment of Berger Singerman LLP as Counsel to the Corporate Monitor, Effective as of September 14, 2021* dated September 18, 2021 (the “**Retention Order**”), authorizing the Corporate Monitor’s employment of Berger Singerman as general counsel to the Corporate Monitor, effective as of September 14, 2021.

11. On May 12, 2023, the Court entered the Receivership Order. As set forth in paragraph 8.w. of the Receivership Order, any professionals (namely, Berger Singerman LLP, Development Specialists, Inc., and e-Forensics, Inc.) previously approved by the Court to provide the Corporate Monitor with services shall be automatically engaged to continue to provide the Receiver with said services without the need for the filing of new applications to retain said professionals.

**DESCRIPTION OF LEGAL SERVICES RENDERED BY BERGER SINGERMAN
DURING THE THIRD INTERIM PERIOD**

12. As of the filing of this Third Interim Fee Motion, there are 33 corporate entities subject of the Receivership. As detailed below, a Claims and Noticing Process has been approved by the Court. The deadline to file proofs of claim was August 31, 2022. As of the date of this

⁶ See Footnote 3 above.

Third Interim Fee Motion, there have been 1670 claims filed, asserting approximately \$383 Million in losses against the Receivership Entities (including claims against Grace Holdings Financial LLC).⁷ These claims primarily represent noteholder or investor claims from individuals who invested or lent money to one or more of the Receivership Entities and include the principal amounts thereof which have not been repaid or returned and thus represent significant losses for which recovery is uncertain. Many of the claimants are older and/or unsophisticated investors.

13. The Receiver, with the assistance of Berger Singerman, has worked diligently to fulfill his duties under the Receivership Order to, *inter alia*, investigate the affairs of the Receivership Entities and seek to maximize the value of the assets of the Receivership Entities, to the extent value exists, to keep informed the Court and creditors/Noteholders, and to move the matter to a phase wherein recoveries could be made to the creditors/victims.

14. In connection with efforts to be transparent in the work being done by the Receiver and in compliance with the Receivership Order, the Receiver, with the assistance of Berger Singerman, filed detailed reports with the Court on June 23, 2023 (the “**Initial Report**”), on October 20, 2023 (the “**Second Report**”), on February 7, 2024 (the “**Third Report**”), on June 6, 2024 (the “**Fourth Report**”), and on October 4, 2024 (the “**Fifth Report**”, and, collectively, the “**Receiver Reports**”). In addition to the five Receiver Reports, the Corporate Monitor filed, with the assistance of Berger Singerman, seven reports of the Corporate Monitor reflecting the status of the operations of the Consenting Corporate Defendants and the financial affairs of the monitorship estate of the Consenting Corporate Defendants. All Receiver Reports and relevant pleadings are regularly posted the Receiver’s website: <http://nationalseniormonitorship.com/> (the “**Receiver’s Website**”). Further, Berger Singerman and more intensively the Receiver respond to

⁷ A detailed description of the relationship between Grace Holdings and the Receivership entities has been set forth in Reports.

multiple inquires every week from noteholders regarding the status of the case. Many are angry, many are complimentary of the Receiver's work, many are frustrated by the actions that brought about their financial loss and the length of time and prospects for recovery and many are just grateful to be heard.

A. Noticing and Claims Administration Process

The Receiver, in his prior capacity as Corporate Monitor, and with the assistance of Berger Singerman, filed a motion seeking approval of certain proposed noticing and claims administration procedures and the form of the notice to be sent to potential claimants (the “**Claim Motion**”). Pursuant to the Claim Motion, the Corporate Monitor sought and obtained the approval of (a) a legal notice to apprise potential claimants of how the claims process was created, who is eligible to submit a claim in order to potentially receive a monetary distribution⁸ from the Corporate Monitorship estate, the process by which eligible claimants can submit a claim, and the process by which the Corporate Monitor will determine which eligible claimants have allowed claims and are thus entitled to receive a *pro rata* distribution, if any, from the Corporate Monitorship estate, (b) a bar date notice to notify the potential claimants of the deadline to file claims and advise claimants that they will be forever barred and permanently enjoined from asserting a claim against the Consenting Corporate Defendants should they fail to timely file a proof of claim, (c) a form Proof of Claim to ask claimants to provide, among other things, (i) the nature of the claim; (ii) a copy of the agreement(s) or other document evidencing or giving rise to the claim; (iii) the amount of the asserted claim against the Consenting Corporate Defendants or Corporate Monitorship estate; and (iv) the amount of any transfer of funds that the claimant or any

⁸ To be clear, at the timing of the filing of Claim Motion, there were no meaningful funds available for distribution. The Claim Motion sought to commence the process of reconciling claims, so that if funds become available for distribution, the process is in place. As referenced herein, certain funds have flowed into the Monitorship Estate and it is anticipated that additional funds will as set forth herein.

of its representatives received from any of the Consenting Corporate Defendants, or any of their affiliates, or any persons or entities on behalf of the foregoing, in connection with the asserted claim.

On June 27, 2022,⁹ the Court entered an Order granting the Claim Motion and setting **August 31, 2022**,¹⁰ as the deadline by which claimants must return completed Proofs of Claim forms to the Corporate Monitor.

As of the filing of this Motion, there were 1,670 claims (collectively, the “**Claims**”) filed.

A summary of Claims received to date is set forth below:

Total # of Claims	1,670
Total # of Individualized Claimants	1,077
Total Amount of Claims	\$383,340.895
Total Amount of Noteholder-related Claims	\$340,718,216
Total Amount of Trade/non-individual Noteholder Creditor Claims	\$42,621,968

B. Discovery

During the Third Interim Period, the Corporate Monitor, with the assistance of Berger Singerman, served subpoenas *duces tecum* upon (i) Bank of America, N.A., (ii) Wells Fargo Bank, N.A.; (iii) Transamerica Life Insurance Company; (iv) Eric Holtz Living Trust; (iv) Shannon Holtz; (v) Alexandra Holtz; (vi) Shutts & Bowen LLP; and (vii) State of Florida Office of Financial Regulation.

As of the filing of this Third Interim Fee Motion, the Corporate Monitor/Receiver and Berger Singerman have issued and served approximately fifty subpoenas to various entities, individuals, and financial institutions requesting various documents, including, but not limited to, bank statements and other financial information.

⁹ On June 29, 2022, the Court entered an Amended Agreed Order Approving the Noticing and Claims Administration Process and same has been posted on the Corporate Monitor’s website.

¹⁰ The Claims Bar Date was extended through and including October 31, 2022, by the federal court as part of the settlement (the “Class Settlement”) reached in the class action case captioned *Millstein, et al. v. Marshal Seeman, et al.*, Case No. 21-CV-61179-RAR (S.D. Fla. 2021).

In addition, the Corporate Monitor/Receiver and his team, including Berger Singerman, have been in discussions with various third parties to obtain documents, data, and information from those third parties, in a cooperative fashion, and hope to be able to meet with and interview representatives of those third parties without the need for formal discovery filings.

C. Recovery Actions

As set forth in the Receiver's Reports, the Receiver, with the assistance of Berger Singerman, has been actively pursuing and settling claims for the benefit of the Receivership estate. Below is a summary of these settlements:

- a. On August 24, 2022, Seeman Holtz Property and Casualty, LLC ("**SHPC**") paid the sum of \$2,250,000.00 (the "**Initial Settlement Payment**") to the Corporate Monitor pursuant to a Court-approved settlement (the "**SHPC Settlement**") between the Corporate Monitor, SHPC, and Hamilton HM 11 Bermuda, HSCM F1 Master Fund Ltd., a Bermuda corporation, and HS Select I, LLC, a Georgia limited liability company (the collectively, "**Secured Lender**"). There may be additional proceeds upon the sale or disposition of SHPC or the SHPC Assets, as further set forth in the SHPC Settlement and Reports.
- b. On August 3, 2023, the Receiver resolved his disputes with American Express Company for the sum of \$920,000.00 (the "**Amex Settlement Monies**"), in full and complete satisfaction of any and all claims that the Receiver has against American Express and the Receiver has received the Amex Settlement Monies.
- c. On April 3, 2024, the Receiver entered into a settlement agreement with the Katchis Family (as defined in the Reports), pursuant to which, the Katchis Family collectively agreed to repay \$900,000.00 of the alleged fraudulent transfers received by them from the Receivership Entities and the \$900,000.00 has been received by the Receiver.
- d. On May 29, 2024, the Receiver entered into a settlement agreement with Fifth Avenue Physicians Services, LLC ("**Fifth Avenue**"), pursuant to which Fifth Avenue agreed to repay \$300,000.00 of the alleged fraudulent transfers received by them from the Receivership Entities, pursuant to an agreed upon payment schedule. Fifth Avenue remitted and the Receiver received the initial settlement payment with the remaining payments to be made pursuant to the agreed upon schedule.

- e. On May 23, 2024, the Court entered an Order approving the Settlement Agreement with another SH Agent. A copy of the redacted settlement agreement may be found on the Receiver's website.¹¹

In addition, in connection with the Receiver's efforts to marshal the assets of the Receivership Entities and pursue claims against individuals and entities that owe the Receivership Defendants money or received fraudulent or otherwise improper transfers from the Receivership Entities, the Receiver, with the assistance of Berger Singerman, has issued seventeen demand letters (the "**Demand Letters**") to various individuals seeking the recovery of in excess of \$10,000,000 in fraudulent transfers. Responses to some of the Demand Letters have been received, and the Receiver, with the assistance of Berger Singerman, have been in discussions with representative(s) of some of the recipients of the Demand Letters in an effort to resolve the disputes with those who have received Demand Letters.

On September 9, 2024, the Court entered an *Order Establishing Procedures Governing Recovery Actions to Be Commenced by the Receiver* (the "**Procedures Order**"), which approved certain guidelines for the efficient administration of Actions (as defined in the Procedures Order), to recover fraudulent transfers and other alleged improper payments made by one or more of the Receivership Entities (the "**Recovery Actions**"). The recoveries are intended to be utilized, inter alia, to fund distributions to creditors in this case.

D. Fraudulent Transfer Actions

On October 25, 2023, the Receiver, with the assistance of Berger Singerman, commenced the following five actions (the "**Fraudulent Transfer Actions**") in the Circuit Court of the Fifteenth Judicial Circuit, in and for Palm Beach County, Florida, seeking the recovery of fraudulent transfers made to certain individuals by the Receivership Entities prior to the

¹¹ On May 21, 2024, the Court entered an Order Granting the Receiver's *Motion to Determine Confidentiality of Court Records and for Approval to File Unredacted Settlement Agreements Under Seal*. The Settlement Agreements attached to each of the Motion to Approve Settlements contain redacted financial terms to protect the Receiver's work product and efforts in future mediations.

commencement of this OFR enforcement action and other causes of action:

a. *Daniel J. Stermer, Receiver v. Jason Sussman, Scott Genad, Daniel Cucuiat, Joseph Corozza, Anthony Lombardo, Darrin Carlomagno, Melody Wilder, Andrea Matthews, Daryl Kutner, Kim Skidmore, Joseph Paluzzi, and Peter Beck*, Case No. 50-2023-CA-015245-XXXAMB. The Amended Complaint filed by the Receiver in this action alleges that Jason Sussman sold over \$221,732,333 of unregistered Notes to innocent investors, and that the Receiver is able to identify that Mr. Sussman received at least \$2,857,122 in the form of payroll, commissions, bonuses, or other compensation from one or more of the Receivership Entities for his involvement with the Para Longevity Scheme (as defined in the Amended Complaint). The Amended Complaint also alleges the remaining SH Defendants sold \$90,000,000 of unregistered Notes to innocent investors and that the SH Defendants received at least \$3,138,997 in the form of payroll, commissions, bonuses, or other compensation from one or more of the Receivership Entities for his involvement with the Para Longevity Scheme. Mr. Sussman filed a motion to dismiss this action and the Receiver filed a response on September 6, 2024. The Receiver is in the process of setting Mr. Sussman's motion to dismiss for hearing before the Court;

b. *Daniel J. Stermer, Receiver v. Dean Emmets*, Case No. 50-2023-CA-015250XXXAMB. The Complaint filed in this action against Mr. Emmets alleges multiple counts of fraudulent transfer pursuant to Florida Statutes, and seeks the recovery of \$244,031.00. On April 10, 2024, a mediation was conducted. Based upon a review of Mr. Emmets' financial disclosures and current circumstances, the Receiver and Mr. Emmets agreed to the entry of a *Stipulation and Consent to Final Judgment Against Defendant* in the amount of \$100,000.00;

c. *Daniel J. Stermer, Receiver v. Daniel Tepper*, Case No. 50-2023-CA-15241XXXAMB. The Complaint filed in this action against Mr. Tepper alleges multiple counts of fraudulent transfer pursuant to Florida Statutes, and seeks the recovery of \$405,958.00. On

April 10, 2024, a mediation was conducted. The Receiver and Mr. Tepper were unable to reach a resolution of the matter and the mediator declared an impasse. The Receiver is continuing the litigation pursuant to the Procedures Order;

d. *Daniel J. Stermer, Receiver v. Antonio Dicembrino*, Case No. 50-2023-CA-015228XXXAMB. The Complaint filed in this action against Mr. Dicembrino alleges multiple counts of fraudulent transfer pursuant to Florida Statutes, and seeks the recovery of \$528,122.00. On April 10, 2024, a mediation was conducted. The Receiver and Mr. Dicembrino were unable to reach a resolution of this matter and the mediator declared an impasse. The Receiver is continuing the litigation pursuant to the Procedures Order; and

e. *Daniel J. Stermer, Receiver v. Jeffrey Abramson*, Case No. 50-2023-CA-015224-XXXAMB. The Complaint filed in this action against Mr. Abramson alleges multiple counts of fraudulent transfer pursuant to Florida Statutes, and seeks the recovery of \$503,429.00. Since the commencement of the lawsuit, the Receiver's investigation revealed that Mr. Abramson received at least \$693,339.00 in commissions or compensation which the Receiver alleges constitutes fraudulent transfers from certain of the Receivership Entities. On April 8, 2024, a mediation was conducted, which resulted in a resolution of this matter. On April 26, 2024, the Receiver filed a motion seeking the approval of a settlement between the Receiver and Mr. Abramson. In accordance with that settlement, the Receiver and Mr. Abramson agreed that other than acknowledging the response to any inquiry the fact that the claims have been settled, the Receiver and Mr. Abramson shall not disclose or discuss any of the terms of the settlement of the claims.

E. Additional Fraudulent Transfer Claims

In addition to the five Fraudulent Transfer Actions filed on October 25, 2023, the Receiver, with the assistance of Berger Singerman, filed the following fraudulent transfer action in the

Circuit Court of the Fifteenth Judicial Circuit, in and for Palm Beach County, Florida:

a. *Daniel J. Stermer, Receiver v. Richard Donoff*, Case No. 50-2024-CA 006353XXXAMB. The Complaint filed in this action sought to enforce the Court-approved settlement between the Receiver and Richard Donoff. Pursuant to the agreed terms of the settlement between the Receiver and Mr. Donoff, upon a default, the Receiver was entitled to the entry of an agreed final judgment in the amount of \$796,295.00. On August 9, 2024, the Receiver filed *Plaintiff's Notice of Filing Answer, Waiver of Defenses, and Consent to Judgment of Defendant, Richard Donoff* and on August 19, 2024, the Court entered an *Agreed Final Judgment Against Defendant* (the “**Donoff Judgment**”) thereby entering judgment in favor of the Receiver and against Richard Donoff in the amount of \$796,295.00, plus interest at the rate of 18% per year for all amounts from the date of entry of the Donoff Judgment until satisfied.

Mr. Donoff contested the enforcement of the settlement agreement and the entry of the Donoff Judgment and filed *Defendant Richard Donoff's Motion for Reconsideration of Approval of Settlement and Agreed Final Order Against Defendant* (the “**Donoff Motion for Reconsideration**”) in this action on September 4, 2024. On September 16, 2024, the Receiver filed, with the assistance of Berger Singerman, *Receiver, Daniel J. Stermer's Response in Opposition to Richard Donoff's Motion for Reconsideration of Approval of Settlement and Agreed Final Order Against Defendant* (the “**Receiver's Response**”) and, on September 20, 2024, the Court entered an *Order Denying Motion for Reconsideration of Approval of Settlement and Agreed Final Order Against DFT F/B DFT Richard Donoff* (the “**Order Denying Motion for Reconsideration**”), thereby denying the Donoff Motion for Reconsideration. On October 23, 2024, Richard Donoff filed *Defendant's Notice of Appeal* to the Fourth District Court of Appeals, with respect to the Court's Order Denying Motion for Reconsideration.

On October 11, 2024, the Receiver filed an *Ex Parte Motion to Compel Judgment Debtor,*

Richard Donoff, to Complete Fla. R. Civ. P. Form 1.977 Fact Information Sheet, which was granted by Order dated October 12, 2024, thereby directing Richard Donoff to complete under oath Florida Rule of Civil Procedure Form 1.97 Fact Information Sheet, including all required attachments, and serve it on the Receiver's counsel no later than October 17, 2024, unless the Donoff Judgment is satisfied.

In addition, on October 11, 2024, the Receiver filed *Plaintiff's Ex Parte Motion for Issuance of Writ of Garnishment After Judgment Upon Todd A. Zuckerbrod, P.A.*, which was granted by Order dated October 12, 2024. On October 17, 2024, the Clerk of the Court issued a *Writ of Garnishment* directed to garnishee, Todd A. Zuckerbrod, P.A., which was served upon Todd A. Zuckerbrod, P.A. on October 18, 2024.

Unfortunately, a straightforward settlement than could have promptly and efficiently resolved the matter for all involved and brought in funds to assist in repaying victims is now causing the Receivership Estate to incur significant unnecessary fees and expenses (all to the detriment of the victims). Berger Singerman has incurred over 72 hours of time and approximately \$43,000 seeking to enforce the agreement against Mr. Donoff. It is these types of unnecessary actions that increase the fees in this case.

The Receiver, with the assistance of Berger Singerman, also negotiated, scheduled and participated in mediations with other individuals and entities who were served with demand letters as to their participation in the Para Longevity scheme, but where complaints had not yet been filed. With the assistance of Berger Singerman, as well as mediators, Roy Kobert and Keith Appleby, the Receiver entered into pre-suit settlement agreements with David Coyman, Ian Bossie, and Richard Huling. These settlements were approved pursuant to motions filed in this enforcement matter. The mediation process was implemented to allow for an efficient and cost-effective dispute resolution process. In most instances this has proven successful with some noted

exceptions such as Mr. Donoff and Pelican (as defined below).

F. Other Litigation

On May 9, 2024, the Receiver, with the assistance of Berger Singerman, commenced the following actions in the Circuit Court of the Fifteenth Judicial Circuit, in and for Palm Beach County, Florida:

a. *Daniel J. Stermer, Receiver v. Wells Fargo Bank, N.A.*, Case No. 50-2024-CA-004345XXXAMB and 9:24-cv-80722-XXXX. The Complaint filed against Wells Fargo Bank, N.A., asserts claims of: Aiding and Abetting Breach of Fiduciary Duties; Aiding and Abetting Fraud; Negligence; and Unjust Enrichment (the “**Wells Fargo Complaint**”). The Receiver alleges that Wells Fargo Bank, N.A. had a bird’s eye view of the Ponzi scheme and that it knew (or should have known) and failed to stop the operators of the Ponzi scheme from using funds raised from new investors to pay off old investors. On May 14, 2024, the Wells Fargo Complaint was served upon Wells Fargo Bank, N.A. On June 7, 2024, Wells Fargo Bank, N.A. filed a *Notice of Removal* with the United States District Court for the Southern District of Florida, thereby removing the suit commenced by the Receiver against Wells Fargo Bank, N.A. in the Circuit Court in and for Palm Beach County, Florida to the United States District Court for the Southern District of Florida (the “**District Court**”), Case No. 9:24-cv-80722-DPG. The District Court entered a scheduling order setting various deadlines and dates, as well as setting the trial in this matter for the Court’s two-week trial calendar beginning on Monday, December 15, 2025.

b. *Daniel J. Stermer, Receiver v. Pelican Capital Management, LLC*, Case No. 50-2024-CA-004344XXXAMB. The Complaint filed against Pelican Capital Management, LLC (“**Pelican**”) asserts claims of fraudulent transfer and unjust enrichment (the “**Pelican Complaint**”). The Pelican Complaint alleges that the money received by Pelican was obtained from innocent investors involved in the Para Longevity scheme, orchestrated by Marshal Seeman

and Eric Holtz, resulting in the loss of more than \$300 million to more than 1,000 elderly, retired, and unaccredited investors. The Pelican Complaint alleges that Pelican received over \$1,200,000 from the Para Longevity scheme for no value given. On August 12, 2024, the Receiver and Pelican participated in a mediation, which did not result in a resolution of the action against Pelican. On September 30, 2024, Pelican filed its *Motion to Dismiss* (the “**Pelican Motion to Dismiss**”) seeking to dismiss the Pelican Complaint. In addition, on September 30, 2024, Pelican issued discovery requests upon the Receiver, requesting that the Receiver respond to requests for production, requests for admissions and answer interrogatories (collectively, the “**Pelican Discovery Requests**”). On October 15, 2024, the Receiver, with the assistance of Berger Singerman, filed his *Verified Motion to Disqualify the Law Offices of Scott Alan Orth, P.A., and Scott Alan Orth, Esq. as Counsel to Defendant Pelican Capital Management, LLC* (the “**Disqualification Motion**”), seeking to disqualify the Law Offices of Scott Alan Orth, P.A. and Scott Alan Orth, Esq. as counsel for Pelican due to a conflict of interest, and requesting an award of attorneys’ fees and costs incurred since September 30, 2024, by the Receiver and his counsel. The Disqualification Motion is scheduled for a special set hearing on February 6, 2024, at 2:00 p.m. On October 22, 2024, the Receiver filed, with the assistance of Berger Singerman, *Receiver’s Motion for Protective Order and to Stay* (“**Motion for Protective Order**”) seeking the entry of a protective order and a stay of the Pelican Discovery Requests and the Pelican Motion to Dismiss until the Court adjudicates the Disqualification Motion. A hearing to consider the Motion for Protective Order is scheduled for November 19, 2024, at 8:45 a.m. The issues described in this paragraph are yet another example of unnecessary actions being undertaken by the participants in this scheme to unnecessarily increase the expense and burden on the Receivership estate. For example, Berger Singerman has now incurred 39 hours of time (approximately \$24,000) addressing and dealing with Pelican and the clearly improper representation of same by Mr. Orth.

These unnecessary actions are solely to the detriment of the victims and unfortunately perpetuate the harms to the victims by forcing the Receivership Estate to incur and pay such fees and expenses.

G. Other Action(s)

During the Third Interim Period, Berger Singerman rendered legal services that were necessary and beneficial to the Receivership Estate as summarized above and, *inter alia*, as described below:

- a. Berger Singerman assisted the Receiver with issues pertaining to claims, including, but not limited to, responding to inquiries from creditors regarding the status of this case, reviewing and analyzing claims filed in the Receivership estate, assisting with the preparation of an analysis of investor claims, and participating in discussions regarding various claims issues.
- b. Berger Singerman assisted the Receiver with conducting research regarding various issues, including, but not limited to, fraudulent transfers, Ponzi schemes, confidentiality and non-disclosure agreements, proceedings supplementary, claims issues, appeal issues, service issues, as well as conducting research to locate addresses for service of process upon various individuals.
- c. Berger Singerman assisted the Receiver with an analysis of the payments made to American Express Company, American Express National Bank, and American Express Travel Related Services Company (collectively, “Amex”), the preparation of a settlement agreement between the Receiver and Amex, as well as a motion to approve settlement.
- d. Berger Singerman participated in multiple status and strategy calls with the Receiver and other professionals of Development Specialists, Inc., with respect to various issues, including, but not limited to, the status of this Receivership proceeding, litigation claims, the production of documents from various entities, individuals and financial institutions, mediations, and the claims filed by Noteholders and other creditors.
- e. Berger Singerman assisted the Receiver Monitor with the preparation of numerous subpoenas directed to various entities, individuals, and financial institutions, directing the production of various documents and banking records, and notices of intent to serve these subpoenas.
- f. Berger Singerman reviewed and organized documents produced in response to the subpoenas, and corresponded with the Receiver and other professionals of Development Specialists, Inc. regarding same.

- g. Berger Singerman attended multiple discussions with the Receiver and members of Development Specialists, Inc. regarding case administration issues, discovery-related issues, and conducted strategy discussions in advance of meetings relating to the business of the Receivership Defendants.
- h. Berger Singerman conducted multiple discussions with counsel for Teleios LS Holdings IV DE, LLC and Teleios LS Holdings V, DE, LLC (collectively, “Teleios”) regarding the status of this Receivership, and reviewed and analyzed pleadings filed by Teleios, including Teleios’ motion to dismiss intervenor-plaintiffs, Edwin and Karen Ezrine.
- i. Berger Singerman assisted with the preparation and service of numerous demand letters and complaints commencing the various supplement proceedings listed above, reviewed and analyzed responses received, and conducted strategy discussions with the Receiver and other members of Development Specialists, Inc. regarding the supplemental proceedings.
- j. Berger Singerman assisted with the preparation of numerous mediation statements, attended prepared for and mediations conducted on January 26, 2024, March 26, 2024, April 8, 2024, April 10, 2024, April 24, 2024, May 8, 2024, and August 16, 2024, and prepared settlement agreements reflecting the resolution of certain of the matters that were resolved at mediation.

15. During the Third Interim Period, Berger Singerman assisted with the preparation and filing of various motions, notices, and proposed orders in this case, including, but not limited to:

- a motion to approve a settlement between the Receiver and Amex, as well as a proposed order granting same, which was entered on August 25, 2023;
- a motion seeking the entry of an order establishing procedures governing the recovery actions filed by the Receiver, as well as a proposed order granting same, which was entered on September 5, 2023;
- a motion to extend certain deadlines set forth in the Court’s *Order Establishing Procedures Governing Recovery Actions to Be Commenced by the Receiver*, which was entered on October 10, 2023;
- second interim motions seeking compensation for professional services rendered and reimbursement of expenses on behalf of Berger Singerman, the Corporate Monitor/Receiver, Development Specialists, Inc., and e-Forensics Incorporated, which were filed on October 10, 2023, and granted by orders dated November 4, 2023;
- affidavits as to the reasonableness of the attorneys’ fees of Berger Singerman, the

Corporate Monitor/Receiver, and Development Specialists, Inc., which were filed on October 17, 2023;

- a notice of selection of mediators, filed on October 24, 2023;
- an initial list of key witnesses, filed on November 1, 2023;
- a motion seeking to expand the Receivership estate to include Grace Holdings Financial LLC, as well as a proposed order granting same, which was entered on November 28, 2023;
- a motion seeking the entry of an order relieving the Receiver from tax obligations of the Receivership Defendants, as well as a proposed order granting same, which was entered on January 11, 2024;
- a motion to approve the administrative expense claim of MCM 301 Yamato, LLC, as well as proposed order granting same, which was entered on January 12, 2024;
- a motion for an extension of time to conduct mandatory mediations for recovery actions filed by the Receiver, as well as a proposed order granting same, which was entered on February 28, 2024;
- a motion to approve a settlement agreement between the Receiver, Peter Katchis, Randall Katchis, Stuart Katchis, and Victoria Katchis, as well as a proposed order granting same, which was entered on April 3, 2024;
- a motion to approve a settlement agreement between the Receiver and David Coyman, as well as proposed order granting same, which was entered on May 22, 2024;
- a motion to approve a settlement agreement between the Receiver and Richard Donoff, as well as proposed order granting same, which was entered on May 29, 2024;
- a motion to determine confidentiality of court records, as well as a proposed order granting same, which was entered on May 21, 2024;
- a motion to approve a settlement agreement between the Receiver and Ian Bossie, as well as proposed order granting same, which was entered on May 22, 2024;
- a motion for approval to enter into a stipulation for entry of a consent judgment as to liability, as well as a proposed order granting same, which was entered on May 29, 2024;
- a motion to approve a settlement agreement between the Receiver and Fifth Avenue Physicians Services, LLC, as well as proposed order granting same, which was entered on May 29, 2024; and

- a motion to approve a settlement agreement between the Receiver and Richard Huling, as well as proposed order granting same, which was entered on May 29, 2024.
- a motion to strike and response in opposition to Richard Donoff's motion to set aside settlement agreement for breach of contract and bad faith.
- a response in opposition to Richard Donoff's motion for reconsideration of approval of settlement and agreed final order.
- a notice of filing of the Receiver's response in opposition to the motion to dismiss the Receiver's initial and amended complaint filed by Daniel Cucuiat.
- a motion for the commencement of a claims distribution process and protocol.

16. In addition to the preparation of the above listed motions, notices, and proposed orders, Berger Singerman assisted the Receiver with the preparation and filing of the Receiver Reports, all updates, and information for Noteholders regularly. As set forth above, during the Third Interim Period, Berger Singerman responded to and/or assisted the Receiver with responding to telephone and e-mail inquiries from creditors and Noteholders and/or their professionals, in an effort to keep them informed, answer questions (not providing legal advice), directing them to third parties for assistance and in many instances just assisting them in understanding the process. Some of the communications have been complimentary of the efforts of the Receiver and Berger Singerman, despite the difficult situation that the Noteholders find themselves. Some communications have not been pleasant, but they all must be and have been responded to.

17. In addition, during the Third Interim Period, Berger Singerman prepared for and attended hearings held in this case on May 17, 2023, May 31, 2023, August 23, 2023, September 5, 2023, October 31, 2023, November 28, 2023, January 11, 2024, March 18, 2024, April 3, 2024, May 21, 2024, May 29, 2024, and May 30, 2024.

18. Berger Singerman continues to assist the Receiver and his professionals with ongoing investigation(s) and analysis which could lead to list of targets expanding in number and

amount of recovery sought.

19. The Receiver presently maintains funds of approximately \$2.5 Million.

20. In addition to the detailed description of activities Berger Singerman deals with multiple issues on a daily basis regarding the administration of this case as well as issues pertaining to the numerous supplementary proceedings filed, communication with constituents, efforts to bring about resolutions between parties and various issues. This started out and remains a very complicated case with many, many moving parts, with new aspects coming to light as this matter continues.

21. A detailed fee statement reflecting the services rendered on behalf of the Receiver during the Third Interim Period, representing 1,526.70 hours performed by the attorneys and paraprofessionals at Berger Singerman, is attached as **Exhibit “A”**.¹² The blended hourly rate during the Third Interim Period is \$579.32 for all attorneys and paraprofessionals. The Plaintiff requested that Berger Singerman consider a reduction in its hourly rates or fees based upon the nature of the engagement. This was set forth in paragraph 7 of the Retention Application and paragraph 3 of the Retention Order, Berger Singerman has agreed to voluntarily reduce its fees requested herein from \$1,000,966.00 to \$884,449.00. The fees and expenses requested by this Motion, do not include fees or expense incurred by Berger Singerman with respect to the Receiver’s action against Wells Fargo Bank, N.A. (the “**Wells Fargo Fees and Expenses**”). The Wells Fargo Fees and Expenses incurred by Berger Singerman, on behalf of the Receiver, will be included in a future motion seeking the approval and award of the Wells Fargo Fees and Expenses.

22. Berger Singerman utilized numerous professionals and paraprofessionals in this

¹² Certain limited redactions have been made to the time records to preserve litigation strategy issues and privilege issues. Please note that the attachment of invoices shall not be deemed a waiver of any attorney-client or Work-Product privilege.

case. All efforts were made to utilize lower hourly rate attorneys where appropriate, to avoid duplication of efforts and to be as efficient as possible. Routine meetings were held to delegate tasks and to ensure that duplication efforts were minimized. The hourly rates charged by Berger Singerman as set forth on **Exhibit “A”** range from \$430.00 to \$750.00 for attorneys and \$295.00 to \$325.00 for paraprofessionals, which is customary for professionals and paraprofessionals in Florida of similar skill and experience. Berger Singerman’s actual fees incurred during the Third Interim Period totaled \$1,000,966.00, representing 1,722.20 hours of time spent by its attorneys and paraprofessionals working on this matter. However, Berger Singerman voluntarily reduced its fees by 11.64%, or \$116,517.00, from \$1,000,966.00 to \$884,449.00, during the Third Interim Period, at the request of the Plaintiff, in order to accommodate the Plaintiff’s request for reduced hourly rates.

23. Berger Singerman and the Receiver have conferred with Plaintiff about the contents of this Third Interim Fee Motion and the Plaintiff has no opposition to this Motion being filed and fees being allowed and paid in a sum to be agreed to by the Plaintiff and which shall reflect a reduction of the fees being sought, understanding that funds will remain in the estate for distribution, at some point in time, to allowed claims.

**BERGER SINGERMAN’S EXPENSES INCURRED
DURING THE THIRD INTERIM PERIOD**

24. Berger Singerman also requests reimbursement of expenses incurred as counsel to the Receiver, during the Third Interim Period in the amount of \$11,588.99. A breakdown of these expenses is set forth below, and is also included in **Exhibit “A”** hereto.

Description	Amount
Subpoena fees (fees to Chief Financial Officer as registered agent for Transamerica Life Insurance Company; research fees charged by financial institutions for compliance with subpoenas)	\$193.48
Court Reporter Fees	\$931.00
Filing fees/Fees for Issuance of Summonses	\$4,387.84
Certified Copies	\$98.28
Photocopies/Reproductions (in-house)	\$1,053.00
Courier Charges	\$36.00
On-line Research (Westlaw)	\$2,007.24
On-line Research (PACER)	\$87.70
Postage	\$472.23
Outside Services (OJF Services – service of process for subpoenas and summonses)	\$1,587.97
Recording fees	\$90.25
Transcripts	\$644.00
TOTAL	\$11,588.99

CONCLUSION

Berger Singerman respectfully requests that the Court (a) approve Berger Singerman's Third Interim Fee Motion requesting compensation in the amount of \$884,449.00, after voluntary reduction from \$1,000,966.00, and expenses in the amount of \$11,588.99, for a total approved amount of \$896,037.99, for the Third Interim Period; (b) authorize the Receiver to pay to Berger Singerman at this time an amount as agreed to of up to \$884,449¹³ in fees and \$11,588.99 in expenses, with further payments to be subject to further Court Order; and (c) authorize the Receiver to pay Berger Singerman the sum of \$153,483.62, representing the approved and awarded fees of

¹³ The Receiver and his Professionals have been and continue to be in discussions with Plaintiff regarding the amount to be authorized for payment to the Receiver and his Professionals for amounts previously awarded but not yet authorized and/or to be awarded and authorized pursuant to the Third Interim Fee Motions of the Receiver and his Professionals. It is anticipated that reduced sum will be agreed to an announced at the hearing on this Motion, subject to Court approval of same.

Berger Singerman, as requested in the Second Interim Fee Motion, for the period of August 1, 2022, through May 11, 2023, which have not yet been authorized to be paid.

WHEREFORE, Berger Singerman respectfully requests that the Court enter an Order (i) approving and allowing all fees and expenses requested during the Third Interim Period (\$884,449.00 in fees and \$11,588.99 in expenses), but authorizing the payment of fees and expenses at this time, subject to further payments on the amounts being authorized and allowed at a later date; (ii) authorizing the Receiver to pay to Berger Singerman the sum of \$153,483.62, representing the fees approved and awarded, but not yet authorized to be paid from Berger Singerman's Second Interim Fee Motion, and (iii) granting such other and further relief as may be necessary under the circumstances.

Dated: November 14, 2024

Respectfully submitted,

BERGER SINGERMAN LLP
Counsel for Receiver
201 E. Las Olas Boulevard, Suite 1500
Fort Lauderdale, FL 33301
Telephone: (954) 525-9900
Facsimile: (954) 523-2872

By: /s/ Brian G. Rich

Brian G. Rich, FBN 38229
brich@bergersingerman.com
Gavin C. Gaukroger, FBN 76489
ggaukroger@bergersingerman.com
Michael J. Niles, FBN 107203
mniles@bergersingerman.com
DRT@bergersingerman.com

CERTIFICATE OF SERVICE

I **HEREBY CERTIFY** that on November 14, 2024, the foregoing was filed using the Florida Court's E-Filing Portal, which served a copy of the foregoing electronically upon all electronic service parties set forth on the attached Service List.

By: /s/ Brian G. Rich
Brian G. Rich

SERVICE LIST

A. Gregory Melchior, Esq., Chief Counsel
George C. Bedell, III, Esq., Chief Counsel
Office of General Counsel
Florida Office of Financial Regulation
200 East Gaines Street
Tallahassee, FL 32309
Greg.Melchior@flofr.gov
George.Bedell@flofr.gov
Sharon.Sutor@flofr.gov
Counsel for Plaintiff

Daniel J. Stermer, Esq.
Development Specialists, Inc.
500 E. Broward Boulevard
Suite 1700
Fort Lauderdale, Florida 33394
dsterner@DSIConsulting.com
Receiver

Victoria R. Morris, Esq.
Andrew C. Lourie, Esq.
Kobre & Kim LLP
201 South Biscayne Boulevard, Suite 1900
Miami, FL 33131
Andrew.Lourie@kobrekim.com
Victoria.Morris@kobrekim.com
Attorneys for Relief Defendant Seeman Holtz
Property and Casualty LLC

Joshua W. Dobin, Esq.
James C. Moon, Esq.
Meland Budwick, P.A.
3200 Southeast Financial Center
200 South Biscayne Boulevard
Miami, FL 33131
jdobin@melandbudwick.com
jmoon@melandbudwick.com
mramos@melandbudwick.com
Attorneys for Teleios LS Holdings V DE, LLC
and Teleios LS Holdings IV DE, LLC

Scott Alan Orth, Esq.
Law Offices of Scott Alan Orth
3860 Sheridan Street, Ste. A
Hollywood, FL 33021
scott@orthlawoffice.com
service@orthlawoffice.com
eserviceSAO@gmail.com
Attorney for Defendant Marshal Seeman, Twenty-
six Defendant Entities

Susan Yoffee, Esq.
Gary A. Woodfield, Esq.
Nason Yeager Gerson Harris & Fumero, P.A.
3001 PGA Boulevard, Suite 305
Palm Beach Gardens, FL 33410
syoffee@nasonyeager.com
gwoodfield@nasonyeager.com
sdaversa@nasonyeager.com
Counsel for The Estate of Eric Charles Holtz

David L. Luikart III, Esq.
Hill, Ward & Henderson, P.A.
101 East Kennedy Boulevard, Suite 3700
Tampa, FL 33602
Dave.luikart@hwlaw.com
Michelle.armstrong@hwlaw.com
Attorneys for Prime Short Term Credit, Inc.

Bernard Charles Carollo, Jr., Esq.
John J. Truitt, Esq.
William Leve, Esq.
Vernon Litigation Group
8985 Fontana Del Sol Way
Naples, FL 34109
bcarollo@vernonlitigation.com
jtruitt@vernonlitigation.com
wleve@vernonlitigation.com
nzumaeta@vernonlitigation.com
Attorneys for Edwin and Karen Ezrine,
Intervenors And Tom Echolds, Interested Party

Gary M. Murphree, Esq.
Brandy Abreu, Esq.
AM Law, LC
10743 SW 104th Street
Miami, FL 33186
gmm@amlaw-miami.com
babreu@amlaw-miami.com
mramirez@amlaw-miami.com
pleadings@amlaw-miami.com
*Attorneys for Zoe Seijas and Victor Seijas,
Jr., Trustees of Victor Seijas Living Trust*

Angela C. Flowers, Esq.
Kubicki Draper
13906 N.E. 20th Avenue, Building 500
Ocala, FL 34470
Af-kd@kubickidraper.com
*Attorneys for Pelican Capital Management,
LLC*

Todd A. Zuckerbrod, Esq.
Todd A. Zuckerbrod, P.A.
40 SE 5th Street
Suite 400
Boca Raton, FL
tz@tzbrokerlaw.com
Attorney for Richard Donoff

Harris J. Koroglu, Esq.
Shutts & Bowen LLP
200 South Biscayne Boulevard, Suite 4100
Miami, FL 33131
hkoroglu@shutts.com
Attorneys for MCM 301 Yamato LLC

Adam J. Ruttenberg, Esq.
Arent Fox Schiff, LLP
800 Boylston Street, 32nd Floor
Boston, MA 02199
Adam.ruttenberg@afslaw.com
Attorney for Pelican Capital Management, LLC

EXHIBIT A

 **BERGER SINGERMAN**

201 E. LAS OLAS BLVD. SUITE 1500
FORT LAUDERDALE, FLORIDA 33301
T: (954) 525-9900 F: (954) 523-2872
WWW.BERGERSINGERMAN.COM
EIN# 45-3121429

DANIEL STERMER
500 W. CYRESS CREEK RD.
FORT LAUDERDALE, FL 33309

November 7, 2024
Invoice: 286557

Client: 29956-0002

Re: ***REPRESENTATION OF DANIEL J. STERMER, RECEIVER
FOR NATIONAL SENIOR INSURANCE, INC., ET AL.***

For professional services rendered thru: ***September 30, 2024***

Total Fees	884,449.00
Total Expenses	11,588.99
Total Balance Due	\$896,037.99

As always, it is our pleasure to work with you! Payment is due upon receipt.
Payments Options:

You may remit payment via check or visit www.bergersingerman.com/info/client-tools/ to pay by eCheck or credit card.

If you wish to remit payment via wire transfer, please refer to the instructions below.

Thank you!

Wiring instructions for Berger Singerman:

Bank:	City National Bank of Florida
Bank Address:	25 W Flagler Street Miami, FL 33130
ABA No.:	066004367
Account Name:	Berger Singerman, LLP Merchant Account
Account No.:	██████████
Reference Number:	29956-0002



DANIEL STERMER
500 W. CYRESS CREEK RD.
FORT LAUDERDALE, FL 33309

INVOICE DATE: November 7, 2024
INVOICE NO. 286557

REPRESENTATION OF DANIEL J. STERMER, RECEIVER FOR
NATIONAL SENIOR INSURANCE, INC., ET AL.

MATTER ID: 29956-0002

PROFESSIONAL LEGAL SERVICES RENDERED THROUGH: September 30, 2024

F E E S

Date	Attorney	Description	Hours	
05/12/23	BGR	WORK ON AMEX ANALYSIS IN PREPARATION FOR CALL WITH FRANK WHITE	0.80	
05/12/23	BGR	ATTEND TO COMMON INTEREST AGREEMENT/CONFIDENTIALITY AGREEMENT, AND PRODUCTION OF DOCUMENTS	0.80	
05/12/23	MAH	ANALYZE BUSINESS RECORDS CERTIFICATION (.1); DRAFT LETTER TO ██████████ CONFIRMING ██████████ ██████████ SEND DRAFT TO CLIENT (.4); SEND FINAL LETTER TO ██████████ (.1)	0.60	
05/12/23	MJN	CORRESPOND WITH T. CARUSO REGARDING LINK TO DOCUMENTS [.2 NO CHARGE]	0.00	N/C
05/15/23	BGR	WORK ON AMEX ANALYSIS AND PREPARE FOR CALL WITH AMEX COUNSEL	1.20	
05/15/23	MJN	RESEARCH REGARDING PONZI SCHEMES AND FRAUDULENT TRANSFERS.	1.20	
05/15/23	MJN	REVIEW AND REVISE CONFIDENTIALITY AGREEMENT AND COMMON INTEREST AGREEMENT; CORRESPOND WITH D. STERMER AND C. SCHOEPPL REGARDING THE SAME.	0.70	
05/16/23	BGR	PREPARE FOR AND ATTEND CALL WITH AMEX	1.20	
05/16/23	BGR	FURTHER WORK ON AMEX CLAIM ANALYSIS [.6 NO CHARGE]	0.00	N/C
05/16/23	KLB	REVIEW EMAILS FROM U.S. BANK REPRESENTATIVE REGARDING PRODUCTION OF DOCUMENTS AND DOWNLOAD AND ORGANIZE SAME (.5); MULTIPLE	0.70	

F E E S

Date	Attorney	Description	Hours	
		EMAILS TO AND FROM U.S. BANK REPRESENTATIVE AND TO T. CARUSO OF DSI REGARDING DOCUMENTS PRODUCED AND MISSING DOCUMENTS AND CHECK IMAGES (.2)		
05/16/23	KLB	REVIEW EMAIL FROM T. CARUSO REGARDING MISSING STATEMENTS AND CHECK IMAGES FROM U.S. BANK PRODUCTION AND MULTIPLE EMAILS TO AND FROM U.S. BANK REPRESENTATIVE REGARDING SAME	0.50	
05/16/23	MJN	PREPARE FOR (.3) AND PARTICIPATE IN TEAMS CALL WITH BRIAN RICH AND DAN STERMER AND FRANK WHITE/COUNSEL FOR AMERICAN EXPRESS REGARDING DEMAND MADE AND ANALYSIS REGARDING SAME (0.5) AND FOLLOW UP TELECONFERENCE WITH BRIAN RICH AND DAN STERMER REGARDING SAME (0.1) [.9 NO CHARGE]	0.00	N/C
05/16/23	MJN	FURTHER RESEARCH REGARDING FRAUDULENT TRANSFERS	0.40	
05/16/23	MJN	CORRESPOND WITH GUNSTER TEAM REGARDING STATUS OF AKERMAN PRODUCTION. [.3 NO CHARGE]	0.00	N/C
05/17/23	BGR	PREPARE FOR AND ATTEND HEARING ON TELEIOS MOTION TO DISMISS [1.0 NO CHARGE]	0.00	N/C
05/17/23	BGR	REVIEW AND ATTEND TO ANALYSIS OF CLAIMS TO BRING AND AMEX ANALYSIS	1.90	
05/17/23	KLB	REVIEW ADDITIONAL EMAIL FROM REPRESENTATIVE OF U.S. BANK WITH SUPPLEMENTAL PRODUCTION AND ORGANIZE DOCUMENTS PRODUCED; EMAILS TO D. STERMER AND DSI TEAM WITH SUPPLEMENTAL DOCUMENTS	0.30	
05/17/23	MJN	REVIEW SUPPLEMENTAL DOCUMENTS FROM U.S. BANK.	0.30	
05/18/23	BGR	REVIEW AND ANALYZE LITIGATION TARGETS	1.80	
05/18/23	MJN	CORRESPOND WITH H. KOROGLU REGARDING SUBPOENA REQUEST	0.20	
05/22/23	BGR	WORK ON LITIGATION ANALYSIS.	1.20	
05/23/23	BGR	WORK ON AMEX RESPONSE ANALYSIS	1.20	
05/23/23	MAH	COMMUNICATE WITH ████████ RE QUESTIONS ABOUT SUBPOENAED MATERIALS [.1 NO CHARGE]	0.00	N/C
05/24/23	BGR	PREPARE FOR AND ATTEND CALL WITH CLIENT ON LITIGATION CLAIM ANALYSIS	1.80	
05/24/23	KLB	EMAILS REGARDING SUBPOENA TO BANK OF	0.20	

F E E S

Date	Attorney	Description	Hours	
		AMERICA AND REVISE SAME; EMAILS TO AND FROM B. RICH REGARDING SERVICE OF SUBPOENA		
05/24/23	GCG	PARTICIPATE IN TEAMS CALL WITH TAYLOR CARUSO, GABRIA BRENNER, ALEX VAZQUEZ, AND PAT O'MALLEY (PARTIAL), AND BRIAN RICH AND D. STERMER REGARDING STATUS OF CLAIMS RELATED ISSUES, STATUS OF POTENTIAL RECOVERY RELATED ISSUES, AND RELATED ISSUES [.9 NO CHARGE]	0.00	N/C
05/25/23	BGR	WORK ON LITIGATION ANALYSIS AND DRAFT DEMAND LETTERS	1.50	
05/25/23	BGR	WORK ON DRAFT DEMAND LETTERS	0.90	
05/25/23	KLB	EMAILS FROM AND TO B. RICH REGARDING SUBPOENA TO BANK OF AMERICA; FINALIZE SUBPOENA AND PREPARE FOR SERVICE; UPDATE SUBPOENA TRACKER CHART	0.40	
05/25/23	KLB	CONDUCT RESEARCH TO LOCATE PROBATE CASE IN NEW JERSEY FOR BRIAN J. SCHWARTZ, AND EMAILS TO AND FROM B. RICH REGARDING SAME	0.90	
05/26/23	BGR	WORK ON LITIGATION ANALYSIS.	0.80	
05/27/23	BGR	WORK ON LITIGATION PLAN	2.20	
05/30/23	BGR	REVIEW AND PREPARE FOR AMEX CALL AND UPDATE ANALYSIS	0.90	
05/30/23	KLB	GATHER MOTION TO WITHDRAW AND HEARING NOTICE AND EMAILS TO AND FROM B. RICH WITH HEARING MATERIALS FOR MAY 31, 2023 HEARING	0.00	N/C
05/30/23	MJN	CORRESPOND WITH S. SCHNEIDER AND A. GALER REGARDING COHN REZNICK AND DAZKAL BOLTON SUBPOENA. FOLLOW UP REGARDING THE SAME.	0.50	
05/31/23	BGR	PREPARE FOR AND ATTEND HEARING ON MOTION TO WITHDRAW	0.60	
05/31/23	BGR	PREPARE FOR AND ATTEND FOLLOW-UP CALL WITH AMEX COUNSEL (1.2) AND CALL WITH CLIENT (.5)	1.70	
05/31/23	BGR	FOLLOW-UP ON SUBPOENAS AND DEMAND LETTERS	0.80	
06/01/23	KLB	REVISE AND FINALIZE NOTICE OF INTENT TO ISSUE SUBPOENA TO BANK OF AMERICA, FORMAT AND E-FILE SAME; DISCUSSIONS WITH M. NILES REGARDING REQUEST FOR COPIES FILED BY M. SEEMAN WITH RESPECT TO U.S. BANK PRODUCTION	0.30	
06/02/23	KLB	REVIEW MESSAGE FROM CLAIMANT, PAUL ROSENFELD, AND EMAILS TO D. STERMER REGARDING SAME [.1 NO CHARGE]	0.00	N/C

F E E S

Date	Attorney	Description	Hours	
06/02/23	MAH	TELEPHONE CONFERENCE WITH ██████ RE ADDITIONAL REQUEST FOR INFORMATION	0.10	
06/05/23	BGR	WORK ON LITIGATION CLAIMS	0.90	
06/05/23	MAH	REVIEW AND ANALYZE EMAIL FROM D. STERMER RE ADDITIONAL INFORMATION FOR ██████	0.10	
06/09/23	KLB	DISCUSSIONS WITH M. NILES REGARDING SUBPOENA TO DASZKAL BOLTON AND COHNREZNICK; PREPARE SUBPOENA TO DASZKAL BOLTON AND PREPARE NOTICE OF INTENT TO SERVE SUPBPOENA	0.70	
06/09/23	KLB	REVIEW ORDER APPOINTING RECEIVER AND DISCUSSIONS WITH M. NILES REGARDING DEADLINE FOR RESPONDING TO DISCOVERY REQUESTS [.2 NO CHARGE]	0.00	N/C
06/09/23	KLB	FINALIZE, FORMAT AND E-FILE NOTICE OF INTENT TO ISSUE SUBPOENA UPON DASZKAL BOLTON [.2 NO CHARGE]	0.00	N/C
06/12/23	MAH	EMAIL ██████ RE REQUEST FOR INFORMATION	0.10	
06/13/23	BGR	REVIEW AMEX REPLY AND CALL WITH CLIENT [.3 NO CHARGE]	0.00	N/C
06/14/23	BGR	CONTINUED LITIGATION CLAIM ANALYSIS	0.90	
06/14/23	KLB	REVISE AND FINALIZE SUBPOENA TO BANK OF AMERICA, N.A. AND PREPARE FOR SERVICE; UPDATE SUBPOENA CHART AND DISCUSSIONS WITH M. NILES	0.30	
06/15/23	BGR	FOLLOW-UP ON AMEX ANALYSIS	0.60	
06/15/23	BGR	WORK ON LITIGATION CLAIM ANALYSIS	1.20	
06/15/23	MAH	EMAIL TO ██████ RE QUESTION ABOUT POTENTIAL WITNESS	0.10	
06/19/23	MJN	CORRESPOND WITH H. KOROGLU REGARDING PRODUCTION OF DOCUMENTS [.3 NO CHARGE].	0.00	N/C
06/19/23	MJN	CORRESPOND WITH NICOLE ATKINSON REGARDING SUBPOENA FROM GUNSTER.	0.30	
06/20/23	BGR	ATTEND TEAM STATUS CALL [.5 NO CHARGE]	0.00	N/C
06/20/23	BGR	FOLLOW-UP ON LITIGATION CLAIM ANALYSIS	0.90	
06/20/23	GCG	PARTICIPATE IN TEAMS CALL WITH TAYLOR CARUSO AND GABRIA BRENNER AND BRIAN RICH, MICHAEL NILES, AND D. STERMER REGARDING CLAIMS RELATED ISSUES/STATUS, POTENTIAL INVESTIGATION/LITIGATION RELATED ISSUES AND NEXT STEPS, AND UPCOMING RECEIVER'S REPORT.	0.50	

F E E S

<u>Date</u>	<u>Attorney</u>	<u>Description</u>	<u>Hours</u>	
06/20/23	MJN	PARTICIPATE IN TEAMS CALL WITH TAYLOR CARUSO AND GABRIA BRENNER AND BRIAN RICH, DAN STERMER, AND GAVIN GAUKROGER REGARDING CLAIMS RELATED ISSUES/STATUS, POTENTIAL INVESTIGATION/LITIGATION RELATED ISSUES AND NEXT STEPS, AND UPCOMING RECEIVER'S REPORT [.5 NO CHARGE].	0.00	N/C
06/21/23	BGR	FOLLOW-UP ON RECEIVER REPORT ISSUES	0.90	
06/21/23	KLB	REVISE AND FINALIZE SUBPOENA TO DASKAL BOLTON AND PREPARE FOR SERVICE BY EMAIL AND FIRST CLASS MAIL	0.50	
06/21/23	KLB	PREPARE INITIAL DRAFT OF RECEIVER'S REPORT, AND EMAILS TO B. RICH	1.50	
06/21/23	KLB	EMAILS REGARDING CORRESPONDENCE RECEIVED FROM CLAIMANT, P. ROSENFELD; EMAILS TO D. STERMER REGARDING SAME	0.10	
06/22/23	BGR	REVIEW AND EDIT RECEIVER REPORT	0.90	
06/22/23	BGR	CALL WITH C. SCHOEPPL ON [REDACTED] ISSUES [.8 NO CHARGE]	0.00	N/C
06/23/23	BGR	CALL WITH CLIENT AND FINALIZE FOR FILING RECEIVER'S FIRST REPORT	0.80	
06/23/23	KLB	REVIEW EMAILS FROM COMMENTS TO RECEIVER'S FIRST REPORT (.1); REVISE AND FINALIZE RECEIVER'S FIRST REPORT AND COMPILE EXHIBIT TO SAME (.3); FORMAT AND E-FILE REPORT AND PREPARE FOR SERVICE (.2); CREATE LIVE LINKS IN REPORT FOR POSTING ON RECEIVERSHIP WEBSITE AND EMAILS TO AND FROM D. STERMER (.4)	1.00	
06/26/23	BGR	WORK ON RECEIVER REPORT	1.20	
06/26/23	MJN	CORRESPOND WITH COUNSEL FOR DASZKAL BOLTON REGARDING SUBPOENA.	0.40	
06/27/23	BGR	FOLLOW-UP ON TAX ISSUES FOR RESPONSE TO CREDITORS	0.80	
07/03/23	MJN	CORRESPOND WITH S. SCHNEIDER REGARDING SUBPOENA TO DASZKAL BOLTON	0.30	
07/05/23	BGR	WORK ON DEMAND LETTER AND LITIGATION ISSUES	1.20	
07/05/23	KLB	REVIEW EMAIL FROM RECEIVER REGARDING CALL FROM CSC REGARDING REGISTERED AGENT SERVICES (.1); REVIEW CORPORATE CHART AND TELEPHONE CALL TO CSC REPRESENTATIVE (.3); EMAILS TO RECEIVER REGARDING OUTSTANDING AMOUNTS FOR REGISTERED AGENT SERVICES (.1)	0.50	

F E E S

Date	Attorney	Description	Hours	
07/05/23	MJN	REVIEW PROBATE DOCKET AND AMENDED INVENTORY RE: ERIC HOLTZ PROBATE [.2 NO CHARGE]	0.00	N/C
07/07/23	BGR	FOLLOW-UP ON SUBPOENAS	0.60	
07/11/23	BGR	ATTEND TO LITIGATION CLAIM ANALYSIS	0.90	
07/11/23	GCG	OBTAIN EXTENSION FROM PERSONAL REPRESENTATIVE OF HOLTZ ESTATE TO FILE CLAIM RE OBJECTION AND RELATED EMAILS	0.20	
07/12/23	KLB	REVIEW AND RESPOND TO EMAILS FROM CSC REPRESENTATIVE REGARDING STATUS OF PAYMENT OF INVOICES FOR REGISTERED AGENT SERVICES FOR CENTURION ENTITIES	0.10	
07/13/23	BGR	PREPARE FOR CALL WITH [REDACTED]	0.40	
07/13/23	KLB	PREPARE AGREED ORDER REGARDING EXTENSION OF TIME TO COMMENCE ACTION ON OBJECTION TO CLAIM IN PROBATE CASE; FINALIZE AND SUBMIT PROPOSED ORDER	0.20	
07/13/23	MJN	REVIEW RESPONSE FROM COHN REZNICK REGARDING SUBPOENA.	0.50	
07/14/23	BGR	PARTICIPATE IN TELECONFERENCE WITH CLIENT REGARDING UPCOMING CALL WITH OFR AND ISSUES RELATIVE TO SAME [.2 NO CHARGE]	0.00	N/C
07/14/23	BGR	PREPARE FOR AND PARTICIPATE IN TEAMS CALL WITH CLIENT AND [REDACTED] REGARDING STATUS OF PENDING LITIGATION AND POTENTIAL NEXT STEPS REGARDING SAME (1.0) AND CONTINUED TEAMS CALL WITH CLIENT REGARDING SAME (.1)	1.10	
07/14/23	BGR	CALL WITH CLIENT ON DOCUMENT PRODUCTION AND AMEX	0.40	
07/16/23	MJN	CORRESPOND WITH B. RICH REGARDING NDA; RESEARCH REGARDING THE SAME [.3 NO CHARGE].	0.00	N/C
07/17/23	BGR	WORK ON GRACE DOCUMENT REQUEST ISSUES	0.80	
07/18/23	BGR	PREPARE FOR AND ATTEND TEAM CALL	0.60	
07/18/23	BGR	FOLLOW-UP ON AMEX SETTLEMENT ANALYSIS	0.80	
07/18/23	BGR	CALLS WITH AMEX ON POSSIBLE SETTLEMENT	0.70	
07/18/23	GCG	PARTICIPATE IN TEAMS CALL WITH PAT O'MALLEY, TAYLOR CARUSO, GABRIA BRENNER AND ALEX VAZQUEZ AND BRIAN RICH, D. STERMER, AND MICHAEL NILES REGARDING RECOVERY RELATED ISSUES/STATUS AND NEXT STEPS, LITIGATION	0.00	N/C

F E E S

Date	Attorney	Description	Hours	
		STATUS/ISSUES AND NEXT STEPS, AND CLAIMS RELATED ISSUES AND NEXT STEPS [.5 NO CHARGE]		
07/19/23	KLB	EMAILS REGARDING PREPARATION OF CONSENT FINAL JUDGMENT AND PREPARATION OF SAME	0.30	
07/19/23	MJN	CORRESPOND WITH K. BURNS REGARDING CONSENT JUDGMENT; REVIEW PRIOR DRAFTS. [.4 NO CHARGE]	0.00	N/C
07/19/23	MJN	CORRESPOND WITH N. ATKINSON REGARDING GUNSTER'S RESPONSE TO SUBPOENA.	0.40	
07/20/23	BGR	REVIEW AMEX DRAFT SETTLEMENT	0.70	
07/20/23	KLB	REVIEW EMAIL FROM B. RICH AND PREPARE INITIAL DRAFT OF SETTLEMENT AGREEMENT WITH AMERICAN EXPRESS	1.20	
07/21/23	KLB	REVISE PROPOSED CONSENT FINAL JUDGMENT AND EMAILS TO B. RICH	0.50	
07/21/23	MJN	CORRESPOND WITH S. SCHNEIDER REGARDING DASZKAL BOLTON SUBPOENA.	0.20	
07/22/23	BGR	REVIEW AMEX AGREEMENT	0.60	
07/24/23	BGR	WORK ON LITIGATION STRATEGY ANALYSIS	1.60	
07/24/23	KLB	REVIEW REVISIONS TO PROPOSED SETTLEMENT AGREEMENT WITH AMERICAN EXPRESS, AND REVISE AGREEMENT TO INCLUDE MUTUAL RELEASE LANGUAGE; EMAILS TO AND FROM RECEIVER REGARDING REVISED AGREEMENT	0.60	
07/25/23	MJN	REVIEW CORRESPONDENCE FROM ATTY. SCHOEPPPL AND MOTION; REVIEW RECEIVERSHIP ORDER REGARDING STAY VIOLATION; REVIEW RECEIVERSHIP ORDER REGARDING TAX RETURNS.	0.80	
07/25/23	MJN	CORRESPOND WITH S. SCHNEIDER REGARDING DASKAL BOLTON SUBPOENA.	0.40	
07/26/23	BGR	CALLS RELATED TO [REDACTED]	0.50	
07/26/23	BGR	LITIGATION ANALYSIS WORK; REVIEW DEMAND LETTER AND FORM COMPLAINTS	1.20	
07/26/23	KLB	EMAILS REGARDING PAYMENT OF CSC INVOICES FOR REGISTERED AGENT SERVICES; ARRANGE FOR PAYMENT OF SAME AND EMAILS TO D. STERMER	0.40	
07/26/23	KLB	EMAILS REGARDING PREPARATION OF DEMAND LETTERS TO AGENTS, ETC., AND TELEPHONE CONFERENCE WITH M. NILES [.2 NO CHARGE]	0.00	N/C
07/26/23	MAH	TELEPHONE CONFERENCE WITH [REDACTED]	0.20	

F E E S

Date	Attorney	Description	Hours	
07/26/23	MAH	PARTICIPATE IN CONFERENCE CALL WITH D. STERMER AND B. RICH REGARDING COMMUNICATIONS WITH ██████████ AND DISCUSS RESPONSES TO SAME.	0.50	
07/26/23	MJN	PREPARE FRAUDULENT TRANSFER DEMANDS; REVIEW SPREADSHEETS AND RELATED DOCUMENTS.	1.40	
07/27/23	BGR	LITIGATION PLANNING MEETING; REVIEW DEMAND LETTERS AND TARGETS	1.00	
07/27/23	BGR	REVIEW AMEX COMMENTS TO MOTION [.8 NO CHARGE]	0.00	N/C
07/27/23	BGR	CALL WITH C. SCHOEPPL	0.30	
07/27/23	MAH	TELEPHONE CONFERENCE WITH D. STERMER RE PROPOSED RESPONSE TO ██████████ RE SUBPOENA AND FOLLOW-UP QUESTIONS	0.30	
07/27/23	MAH	REVISE RESPONSES TO ██████████ RE SUBPOENA AND FOLLOW-UP QUESTIONS, SEND TO ██████████ COPY TO D. STERMER	0.20	
07/27/23	MAH	EMAIL D. STERMER AND B. RICH DRAFT RESPONSES RE ██████████ QUESTIONS/REQUESTS	0.30	
07/27/23	MAH	REVIEW MATERIALS AND EDITS TO PROPOSED RESPONSES TO ██████████ FROM D. STERMER	0.10	
07/27/23	GCG	STRATEGY CONFERENCE AND RESEARCH REGARDING CLAIMS ISSUES [.7 NO CHARGE]	0.00	N/C
07/27/23	MJN	CORRESPOND WITH D. STERMER REGARDING DEMAND LETTERS; FINALIZE DEMAND LETTERS	1.40	
07/27/23	MJN	REVIEW AMEX SETTLEMENT AGREEMENT. [.3 NO CHARGE]	0.00	N/C
07/27/23	MJN	CORRESPOND WITH B.RICH AND G. GAUKROGHER REGARDING LITIGATION STRATEGY. [.8 NO CHARGE]	0.00	N/C
07/28/23	BGR	TEAM LITIGATION STRATEGY CALL	1.00	
07/28/23	BGR	PREPARE FOR AND ATTEND CALL WITH STATE	0.80	
07/28/23	BGR	WORK ON DEMAND LETTERS AND AMEX SETTLEMENT ISSUES	1.60	
07/28/23	KLB	FINALIZE TWELVE FRAUDULENT TRANSFER DEMAND LETTERS AND PREPARE EXHIBITS TO EACH (1.5); EMAILS TO AND FROM M. NILES REGARDING SAME (.2)	1.70	
07/28/23	KLB	INITIAL PREPARATION OF MOTION TO APPROVE SETTLEMENT WITH AMERICAN EXPRESS	0.80	

F E E S

<u>Date</u>	<u>Attorney</u>	<u>Description</u>	<u>Hours</u>	
07/28/23	KLB	EMAILS FROM AND TO D. STERMER REGARDING SUBPOENA UPON BANK OF AMERICA	0.20	
07/28/23	KLB	FINALIZE FRAUDULENT TRANSFER DEMAND LETTERS AND FORMAT SAME; PREPARE FOR SERVICE BY FIRST CLASS AND CERTIFIED MAIL	1.20	
07/28/23	GCG	PARTICIPATE IN TEAMS CALL WITH PAT O'MALLEY, TAYLOR CARUSO, BRIAN RICH, MICHAEL NILES, AND D. STERMER REGARDING POTENTIAL RECOVERY RELATED INVESTIGATIONS/ISSUES AND NEXT STEPS REGARDING SAME. [1.2 NO CHARGE]	0.00	N/C
07/28/23	GCG	ANALYZE BANK LIABILITY ISSUES	0.80	
07/28/23	MJN	FINALIZE DEMAND LETTERS.	0.40	
07/28/23	MJN	PARTICIPATE IN TEAMS CALL WITH PAT O'MALLEY, TAYLOR CARUSO, BRIAN RICH, MICHAEL NILES, AND GAVIN GAUKROGER REGARDING POTENTIAL RECOVERY RELATED INVESTIGATIONS/ISSUES AND NEXT STEPS REGARDING SAME	1.20	
07/31/23	BGR	WORK ON LITIGATION ISSUES	1.50	
07/31/23	KLB	EMAILS TO D. STERMER REGARDING LETTER FROM BANK OF AMERICA REGARDING PRODUCTION COSTS (.1); ARRANGE FOR PAYMENT OF BANK OF AMERICA INVOICE AND TELEPHONE CALL TO BANK OF AMERICA REPRESENTATIVE REGARDING STATUS OF PRODUCTION (.3)	0.40	
08/01/23	BGR	REVIEW AND EDIT MOTION TO APPROVE SETTLEMENT WITH AMEX	0.90	
08/01/23	KLB	REVIEW EMAILS REGARDING REVISIONS TO MOTION TO APPROVE SETTLEMENT WITH AMEX (.1); REVISE MOTION AND EMAILS REGARDING FULLY EXECUTED SETTLEMENT AGREEMENT (.2); GATHER EXHIBIT TO SETTLEMENT AGREEMENT, AND PREPARE PROPOSED ORDER APPROVING SETTLEMENT (.6); EMAILS TO AND FROM B. RICH AND D. STERMER REGARDING FILING OF SETTLEMENT MOTION AND STATUS OF RECEIVING AMERICAN EXPRESS'S SIGNATURE PAGES TO AGREEMENT (.2)	1.10	
08/02/23	KLB	REVIEW EMAIL REGARDING PREPARATION OF FRAUDULENT TRANSFER DEMAND LETTERS AND INITIAL PREPARATION OF SAME (1.5); TELEPHONE CONFERENCE WITH M. NILES AND EMAILS TO T. CARUSO REGARDING SAME (.2)	1.70	
08/02/23	MJN	CORRESPOND WITH K. BURNS AND T. CARUSO REGARDING ADDITIONAL FRAUDULENT TRANSFER DEMAND LETTERS; REVIEW SPREADSHEETS	0.70	

F E E S

Date	Attorney	Description	Hours	
		REGARDING THE SAME.		
08/02/23	MJN	RESEARCH REGARDING PROCEEDINGS SUPPLEMENTARY.	1.00	
08/03/23	BGR	WORK ON NEXT ROUND OF DEMAND LETTERS	0.90	
08/03/23	BGR	FOLLOW-UP ON AMEX MOTIONA AND HEARING ISSUES	0.80	
08/03/23	BGR	REVIEW AND ATTEND TO LUCENKO AND OMDALL TRIAL MATTERS	0.80	
08/03/23	KLB	REVISE AND FINALIZE MOTION TO APPROVE SETTLEMENT WITH AMEX AND COMPILE EXHIBITS TO SAME (.4); EMAILS TO AND FROM B. RICH AND D. STERMER REGARDING FULLY EXECUTED SETTLEMENT AGREEMENT (.2)	0.60	
08/03/23	KLB	FINALIZE AND FORMAT MOTION TO APPROVE SETTLEMENT WITH AMEX AND REVIEW FULLY EXECUTED AGREEMENT (.2); E-FILE MOTION TO APPROVE SETTLEMENT AND PREPARE FOR SERVICE (.2); REVIEW AVAILABLE HEARING DATES ON ON-LINE SCHEDULING PORTAL AND EMAILS TO COUNSEL (.2); EMAILS TO RECEIVER REGARDING SCHEDULING OF HEARING (.1)	0.70	
08/03/23	KLB	REVIEW EMAILS FROM T. CARUSO REGARDING PREPARATION OF AVOIDABLE TRANSFER DEMAND LETTERS AND ORGANIZE EXHIBITS TO SAME	0.30	
08/03/23	KLB	REVIEW MULTIPLE EMAILS FROM COUNSEL REGARDING AVAILABILITY FOR ATTENDANCE AT HEARING ON MOTION TO APPROVE SETTLEMENT WITH AMEX	0.20	
08/04/23	BGR	FOLLOW-UP ON AMEX HEARING ISSUES	0.70	
08/04/23	BGR	WORK ON LITIGATION ISSUES	1.20	
08/04/23	KLB	PREPARE NOTICE OF HEARING ON MOTION TO APPROVE SETTLEMENT WITH AMEX AND UPLOAD MOTION TO ON-LINE SCHEDULING PORTAL (.5); FINALIZE, FORMAT AND E-FILE NOTICE OF HEARING AND PREPARE FOR SERVICE, AND UPLOAD FILED NOTICE OF HEARING TO ON-LINE SCHEDULING PORTAL (.2)	0.70	
08/04/23	KLB	PREPARE FRAUDULENT TRANSFER DEMAND LETTERS AND PREPARE EXHIBITS TO SAME (1.3); MULTIPLE EMAILS TO M. NILES WITH DRAFT DEMAND LETTERS (.2)	1.50	
08/04/23	KLB	EMAILS FROM B. RICH REGARDING FEE AND COST INVOICE OF E-FORENSICS, AND PREPARATION OF FEE	0.00	N/C

F E E S

Date	Attorney	Description	Hours	
		MOTION [.1 NO CHARGE]		
08/04/23	MJN	REVIEW REVISED CHART FROM T. CARUSO.	0.40	
08/06/23	BGR	WORK ON LITIGATION RECOVERY ISSUES	1.80	
08/07/23	MJN	CORRESPOND WITH DEMAND LETTER RECIPIENTS REGARDING EXTENSION.	0.40	
08/08/23	BGR	WORK ON ANALYSIS FOR CLAIMS PROCEDURE ISSUES	0.90	
08/09/23	KLB	EMAILS REGARDING BANK OF AMERICA PRODUCTION AND ORGANIZATION OF DOCUMENTS PRODUCED; EMAILS TO D. STERMER AND TEAM WITH LINK TO PRODUCED DOCUMENTS	0.60	
08/09/23	GCG	ANALYZE SPREADSHEET OF INTRA-COMPANY TRANSFERS WITHIN BANKS (.4); STRATEGY CONFERENCE WITH DSI, T. CARUSO AND JACK (.6); ANALYZE EMAILS FROM PRODUCTIONS AND NSI ESI (.6)	1.60	
08/10/23	BGR	ATTEND HODGE DEPO IN OMDCELL MATTER	1.50	
08/10/23	BGR	WORK ON LITGATION ANALYSIS ISSUES	1.20	
08/10/23	KLB	TELEPHONE CALL TO BANK OF AMERICA LEGAL DEPARTMENT REGARDING PRODUCTION OF DOCUMENTS AND EMAILS TO AND FROM D. STERMER AND T. CARUSO REGARDING SAME	0.30	
08/10/23	KLB	REVIEW EMAIL FROM B. RICH, REVIEW AND DOWNLOAD DOCKET FOR CASE OF HSBC V. SEEMAN AND EMAILS TO B. RICH AND TEAM REGARDING SAME [.2 NO CHARGE]	0.00	N/C
08/10/23	KLB	REVIEW INFORMATION FROM T. CARUSO REGARDING ADDITIONAL BANK OF AMERICA ACCOUNT; TELEPHONE CONFERENCE WITH BANK OF AMERICA LEGAL DEPARTMENT AND FOLLOW UP EMAILS TO AND FROM D. STERMER AND TEAM REGARDING SAME	0.30	
08/11/23	BGR	WORK ON CONSENT JUDGMENT	0.50	
08/11/23	KLB	PREPARE THIRD SUBPOENA UPON BANK OF AMERICA REGARDING ADDITIONAL ACCOUNT AND PREPARE NOTICE OF INTENT TO SERVICE SAME; REVIEW EMAIL FROM T. CARUSO REGARDING ACCOUNT INFORMATION FOR ADDITIONAL ACCOUNT	0.60	
08/11/23	MJN	REVIEW CORRESPONDENCE FROM D. EMMETS; FOLLOW UP WITH TEAM REGARDING EXTENSION.	0.20	
08/12/23	BGR	REVIEW AND EDIT AND TRANSMIT PROPOSED	0.40	

F E E S

Date	Attorney	Description	Hours	
		CONSENT JUDGMENT		
08/15/23	KLB	GATHER DOCUMENTS AND PREPARE E-BINDER FOR UPCOMING HEARING	0.30	
08/15/23	MJN	CORRESPOND WITH A. JOWERS REGARDING DEMAND LETTERS; FOLLOW UP REGARDING THE SAME.	0.50	
08/17/23	BGR	WORK ON LITIGATION CLAIM ANALYSIS	0.90	
08/18/23	BGR	CALL WITH TELEIOS COUNSEL	0.60	
08/18/23	BGR	REVIEW AND EDIT PROCEDURE MOTION	1.00	
08/18/23	GCG	REVIEW AND ANALYZE DRAFT PROCEDURES MOTION	0.30	
08/18/23	MJN	FOLLOW UP REGARDING DEMAND LETTER TO J. PALUZZI.	0.20	
08/18/23	MJN	PREPARE MOTION AND ORDER FOR PROCEDURES; RESEARCH REGARDING THE SAME.	2.00	
08/21/23	BGR	WORK ON LITIGATION RESPONSE ISSUES	0.80	
08/21/23	KLB	DISCUSSIONS WITH M. NILES REGARDING DEMAND LETTERS AND EXHIBITS TO SAME [.2 NO CHARGE]	0.00	N/C
08/21/23	KLB	REVISE DEMAND LETTERS AND EXHIBITS; DISCUSSIONS WITH M. NILES AND TELEPHONE CALLS TO T. CARUSO REGARDING PAYMENTS, CASH RECEIPTS, ETC.	0.90	
08/21/23	MJN	FINALIZE PROCEDURES MOTION; FOLLOW UP WITH D. STERMER REGARDING THE SAME.	0.50	
08/22/23	BGR	PREPARE FOR HEARING ON AMEX SETTLEMENT	0.90	
08/22/23	BGR	ATTEND TO FINAL REVIEW OF PROCEDURE MOTIONS	0.60	
08/22/23	BGR	WORK ON FEE MOTION ISSUES	0.60	
08/22/23	KLB	REVISE AND FINALIZE MOTION FOR ORDER ESTABLISHING PROCEDURES AND SCHEDULING ORDER GOVERNING RECOVERY ACTIONS; FORMAT AND E-FILE MOTION AND REVIEW INFORMATION REGARDING AVAILABILITY FOR HEARING; PREPARE FOR SERVICE OF FILED MOTION AND EMAILS REGARDING SAME	0.80	
08/22/23	KLB	UPDATE E-BINDER FOR HEARING ON AUGUST 23, 2023, TO CONSIDER MOTION TO APPROVE SETTLEMENT WITH AMERICAN EXPRESS	0.20	
08/22/23	KLB	REVIEW EMAIL FROM COUNSEL REGARDING AVAILABILITY FOR HEARING ON PROCEDURES MOTION; PREPARE NOTICE OF HEARING AND UPLOAD FILED MOTION TO ON-LINE SCHEDULING PORTAL;	0.80	

F E E S

Date	Attorney	Description	Hours	
		FINALIZE, FORMAT AND E-FILE NOTICE OF HEARING AND PREPARE FOR SERVICE OF SAME; UPLOAD FILED HEARING NOTICE TO ON-LINE SCHEDULING PORTAL		
08/22/23	MAH	TELEPHONE CALL TO [REDACTED] RE VARIOUS OUTSTANDING ISSUES RE RECEIVERSHIP, POSSIBLE DISGORGEMENT; EMAIL D. STERMER AND B. RICH RE SAME	0.30	
08/22/23	GCG	ATTENTION TO MOTION FOR PROCEDURES AND RELATED EMAILS (.2); EMAILS TO/FROM COUNSEL IN PARALLEL CASE TO RECONFIRM STAY (.2)	0.20	
08/22/23	MJN	FINALIZE PROCEDURES MOTION FOR FILING.	0.30	
08/22/23	MJN	REVIEW CORRESPONDENCE FROM BRETT WILLIAMS AND ROSE SCHINDLER.	0.40	
08/23/23	BGR	PREPARE FOR AND ATTEND HEARING ON AMEX SETTLEMENT	0.90	
08/23/23	KLB	REVISE PROPOSED ORDER APPROVING SETTLEMENT WITH AMEX (.2); REVIEW EMAILS FROM B. RICH AND D. STERMER REGARDING RESULTS OF HEARING AND FINALIZE, FORMAT AND SUBMIT PROPOSED ORDER (.3)	0.50	
08/23/23	MJN	ATTEND HEARING ON AMEX SETTLEMENT MOTION. [.3 NO CHARGE]	0.00	N/C
08/24/23	BGR	WORK ON FEE MOTION ISSUES	0.90	
08/25/23	BGR	REVIEW UPDATED TARGET LIST AND ANALYSIS FOR NEXT STEPS ON SAME	1.20	
08/25/23	KLB	EMAILS FROM AND TO B. RICH REGARDING PREPARATION OF FEE MOTIONS FOR BERGER SINGERMAN, DSI AND E-FORENSICS (.1); INITIAL PREPARATION OF FEE MOTION FOR BERGER SINGERMAN (.2)	0.30	
08/25/23	KLB	INITIAL PREPARATION OF SECOND FEE MOTION ON BEHALF OF BERGER SINGERMAN	0.30	
08/28/23	BGR	CALL WITH CLIENT ON [REDACTED] ISSUES	0.90	
08/28/23	KLB	REVIEW TIME ENTRIES AND INITIAL PREPARATION OF SECOND INTERIM MOTION FOR ATTORNEYS' FEES AND COSTS OF BERGER SINGERMAN	1.30	
08/28/23	KLB	CONTINUED PREPARATION OF NARRATIVE OF SECOND INTERIM MOTION FOR ATTORNEYS' FEES AND EXPENSES OF BERGER SINGERMAN	1.30	
08/28/23	MAH	TELEPHONE CONFERENCE WITH [REDACTED] RE FOLLOW-UP ON SUBPOENAED MATERIALS,	0.50	

F E E S

Date	Attorney	Description	Hours	
		INCLUDING D. STERMER, B. RICH		
08/28/23	MJN	CORRESPOND WITH R. SCHINDLER REGARDING [REDACTED]	0.20	
08/29/23	KLB	GATHER SETTLEMENT ORDER AND EMAILS TO COUNSEL FOR AMEX, F. WHITE	0.10	
08/29/23	KLB	CONTINUED PREPARATION OF SECOND INTERIM MOTION FOR FEES AND EXPENSES OF BERGER SINGERMAN LLP	1.60	
08/30/23	BGR	REVIEW AND ATTEND TO LITIGATION RECOVERY RELATED ISSUES; ANALYSIS OF CLAIMS AND FOLLOW-UP ON DEMAND LETTERS	0.90	
08/31/23	BGR	WORK ON DM ISSUES	0.90	
08/31/23	KLB	INITIAL PREPARATION OF SECOND INTERIM FEE MOTION OF E-FORENSICS AND EMAILS TO AND FROM B. RICH REGARDING SAME	0.70	
08/31/23	MAH	REVIEW AND ANALYZE MATERIALS FROM D. STERMER AND PROVIDE SAME TO [REDACTED] PURSUANT TO SUBPONEA	0.10	
09/01/23	KLB	GATHER DOCUMENTS FOR UPCOMING HEARING AND PREPARE E-BINDER FOR B. RICH; EMAILS TO B. RICH WITH HEARING MATERIALS	0.40	
09/03/23	BGR	PREPARE FOR HEARING ON PROCEDURE MOTION.	0.80	
09/05/23	BGR	PREPARE FOR AND ATTEND HEARING ON PROCEDURES FOR RECOVERY ACTIONS	1.00	
09/05/23	BGR	WORK ON FEE MOTIONS [.7 NO CHARGE]	0.00	N/C
09/05/23	BGR	WORK ON NEXT ROUND OF LITIGATION TARGET ANALYSIS	0.60	
09/05/23	KLB	EMAILS REGARDING SUBMISSION OF ORDER ESTABLISHING PROCEDURES AND REVISE PROPOSED ORDER (.3); FORMAT AND SUBMIT PROPOSED ORDER THROUGH COURT'S ON-LINE SCHEDULING PORTAL (.3)	0.60	
09/05/23	KLB	REVIEW COURT'S ON-LINE SCHEDULING PORTAL REGARDING SCHEDULING OF QUARTERLY OMNIBUS HEARING DATES (.2); REVIEW AVAILABLE DATES AND EMAILS TO AND FROM B. RICH AND M. NILES REGARDING LENGTH OF TIME NEEDED, ETC.; EMAILS TO COURTROOM DEPUTY REGARDING ENTRY OF ORDER ESTABLISHING PROCEDURES AND REQUEST FOR AVAILABILITY IN JANUARY 2024 FOR FIRST QUARTERLY OMNIBUS HEARING (.3)	0.50	

F E E S

<u>Date</u>	<u>Attorney</u>	<u>Description</u>	<u>Hours</u>	
09/05/23	KLB	REVISE SECOND INTERIM MOTION FOR FEES AND EXPENSES OF E-FORENSICS AND EMAILS TO B. RICH REGARDING SAME	0.60	
09/05/23	MJN	ATTEND HEARING ON PROCEDURES MOTION; REVIEW AND REVISE ORDER; FOLLOW UP WITH K. BURNS.	1.00	
09/06/23	BGR	FOLLOW-UP ON FEE MOTIONS [.9 NO CHARGE]	0.00	N/C
09/06/23	BGR	WORK ON LITIGATION MATTERS	1.50	
09/06/23	BGR	REVIEW FILINGS IN TELEIOS/EZRINE MATTER	0.50	
09/06/23	KLB	REVIEW D. STERMER'S COMMENTS TO SECOND INTERIM MOTION FOR FEES AND EXPENSES OF E-FORENSICS, AND REVISE SECOND INTERIM MOTION	0.50	
09/06/23	KLB	EMAILS REGARDING SCHEDULING OF FIRST QUARTERLY OMNIBUS HEARING DATES AND EMAILS TO AND FROM JUDICIAL ASSISTANT REGARDING COURT'S AVAILABILITY FOR HEARING [.2 NO CHARGE]	0.00	N/C
09/06/23	KLB	EMAILS REGARDING ADDITIONAL COMMENTS TO SECOND INTERIM MOTION FOR FEES AND EXPENSES OF E-FORENSICS	0.10	
09/07/23	BGR	PREPARE FOR AND ATTEND TELEIOS MOTION TO DISMISS HEARING	0.90	
09/07/23	BGR	WORK ON LITIGATION ISSUES	1.50	
09/07/23	BGR	WORK ON FEE MOTION EDITS FOR BERGER SINGERMAN AND E-FORENSICS	0.80	
09/07/23	KLB	EMAILS REGARDING SECOND INTERIM FEE MOTIONS AND STATUS OF SCHEDULING OF FIRST QUARTERLY OMNIBUS HEARINGS [.2 NO CHARGE]	0.00	N/C
09/07/23	KLB	CONTINUED PREPARATION OF SECOND INTERIM MOTION OF BERGER SINGERMAN FOR ATTORNEYS' FEES AND EXPENSES, AND EMAILS TO B. RICH	0.80	
09/07/23	KLB	REVIEW COMMENTS TO DRAFT OF SECOND INTERIM MOTION FOR ATTORNEYS' FEES AND EXPENSES OF BERGER SINGERMAN, AND INCORPORATED COMMENTS OF D. STERMER	0.20	
09/07/23	MJN	CORRESPOND WITH T. CARUSO REGARDING EXHIBITS TO DEMAND LETTERS; RESEARCH REGARDING THE SAME.	0.50	
09/08/23	BGR	WORK ON REVISIONS TO FEE MOTIONS/CALL WITH CLIENT	0.80	
09/08/23	BGR	ATTEND TO DEMAND LETTER AND COMPLAINT	0.90	

F E E S

Date	Attorney	Description	Hours	
		REVISIONS		
09/08/23	KLB	INITIAL PREPARATION OF SECOND INTERIM MOTION FOR FEES AND EXPENSES INCURRED BY DEVELOPMENT SPECIALISTS, INC., AND PREPARE EXHIBITS TO SAME; EMAILS TO D. STERMER WITH DRAFT MOTION	3.60	
09/10/23	GCG	REVIEW AND RESPOND TO CLIENT EMAIL REGARDING SPECIFIC ISSUES FOR DISTRIBUTION PLANNING	0.20	
09/11/23	BGR	WORK ON FEE MOTION REVIEW	0.80	
09/12/23	BGR	REVIEW DRAFT COMPLAINT	0.90	
09/12/23	MJN	FOLLOW UP WITH TEAM REGARDING LITIGATION AND PROCEDURES ORDER.	0.40	
09/13/23	BGR	WORK ON DRAFT COMPLAINT AND STRATEGY FOR FILING OF SAME AND ANALYSIS	0.90	
09/13/23	BGR	WORK ON DEMAND LETTER RESPONSE ANALYSIS	0.90	
09/13/23	KLB	REVIEW EMAILS REGARDING PREPARATION OF SECOND INTERIM MOTION FOR FEES AND EXPENSES OF CORPORATE MONITOR, AND EMAILS REGARDING BERGER SINGERMAN FEES AND EXPENSES	0.20	
09/13/23	KLB	UPDATE CHART OF FRAUDULENT TRANSFER DEMAND LETTERS AND EMAILS TO M. NILES	0.60	
09/13/23	GCG	ANALYZE COURT ORDER (.1) AND RELATED EMAILS WITH B. RICH AND M. NILES (.1) [.2 NO CHARGE]	0.00	N/C
09/13/23	MJN	CORRESPOND WITH W. DIAB AND B. RICH REGARDING LITIGATION STRATEGY AND OPEN DUE DILIGENCE ITEMS; REVIEW COMPLAINT AND RESPONSES FROM ROSE SCHINDLER. [1.5 NO CHARGE]	0.00	N/C
09/13/23	MJN	CORRESPOND WITH TEAM REGARDING OMNIBUS STATUS HEARING CALENDARING. [.3 NO CHARGE]	0.00	N/C
09/13/23	WOD	ANALYZE ORDER APPROVING PROCEDURES (1.0); ANALYZE FORM COMPLAINT FOR FRAUDULENT TRANSFER (1.0); ATTEND LITIGATION STRATEGY MEETING WITH LITIGATION TEAM.	2.70	
09/14/23	BGR	WORK ON COMPLAINT/LITIGATION ISSUES	0.90	
09/14/23	KLB	TELEPHONE CALL WITH B. RICH REGARDING ENTRY OF ORDER SETTING FIRST OMNIBUS HEARING (.1); EMAILS TO AND FROM JUDICIAL ASSISTANT FOR JUDGE HARPER REGARDING SAME (.2); PREPARE AMENDED ORDER SETTING FIRST OMNIBUS STATUS CONFERENCE AND SUBMIT SAME (.4)	0.70	

F E E S

<u>Date</u>	<u>Attorney</u>	<u>Description</u>	<u>Hours</u>	
09/15/23	KLB	INITIAL PREPARATION OF SECOND MOTION FOR INTERIM FEES AND EXPENSES OF CORPORATE MONITOR, AND EMAILS TO CORPORATE MONITOR REGARDING SAME	0.80	
09/15/23	MJN	CORRESPOND WITH T. CARUSO REGARDING TARGETS AND DEMANDS. REVIEW TARGETS AND DEMANDS	0.70	
09/18/23	BGR	PREPARE FOR AND ATTEND CALL WITH OFR	1.00	
09/18/23	BGR	WORK ON DEMAND LETTER AND LITIGATION ISSUES	0.90	
09/18/23	GCG	STRATEGY WITH M. NILES AND W. DIAB AND REVIEW CORRESPONDENCE FILES AND DRAFT FORM COMPLAINT (.6) [.6 NO CHARGE]	0.00	N/C
09/18/23	MJN	PREPARE FOR AND ATTEND CONFERENCE CALL TO DISCUSS DEMAND LETTERS AND COMPLAINTS.	1.40	
09/18/23	WOD	ANALYZE CASE FILE, MONITORSHIP WEBSITE, CASE UPDATED, AND DEMAND LETTER (2.0); ATTEND CONFERENCE CALL WITH LITIGATION TEAM RE: STRATEGY FOR REPLYING TO DEMAND LETTER RESPONSES AND FILING COMPLAINTS FOR FRAUDULENT TRANSFERS (0.3).	2.30	
09/19/23	BGR	PARTICIPATE IN TEAMS CALL WITH PAT O'MALLEY, TAYLOR CARUSO, AND GABRIA BRENNER REGARDING MATTER STATUS, NEXT STEPS, CLAIMS RELATED ISSUES, RECOVERY RELATED ISSUES, AND FEE RELATED ISSUES [.5 NO CHARGE]	0.00	N/C
09/19/23	BGR	PREPARE FOR TEAM CALL; REVIEW OPEN ISSUES AND DEMAND LETTERS	0.80	
09/19/23	KLB	TELEPHONE CONFERENCE WITH NOTEHOLDER REGARDING STATUS OF RECEIVERSHIP ACTION	0.20	
09/19/23	MJN	PARTICIPATE IN TEAMS CALL WITH PAT O'MALLEY, TAYLOR CARUSO, AND GABRIA BRENNER AND BRIAN RICH AND DAN STERMER REGARDING MATTER STATUS, NEXT STEPS, CLAIMS RELATED ISSUES, RECOVERY RELATED ISSUES, AND FEE RELATED ISSUES.	0.50	
09/20/23	BGR	WORK ON MOTION TO EXPAND RECEIVERSHIP	0.90	
09/20/23	BGR	WORK ON LITIGATION ANALYSIS ISSUES AND REVIEW DRAFT	1.30	
09/20/23	BGR	WORK ON FEE MOTION ISSUES FOR DSI AND RECEIVER	0.60	
09/20/23	KLB	REVISE DEMAND LETTERS TO NUMEROUS INDIVIDUALS AND ENTITIES AND FINALIZE LIST OF TRANSFERS FOR EACH	1.40	

F E E S

Date	Attorney	Description	Hours	
09/20/23	KLB	PREPARATION OF INITIAL DRAFT OF MOTION TO EXPAND RECEIVERSHIP TO INCLUDE TWENTY THREE ADDITIONAL ENTITIES; EMAILS TO AND FROM B. RICH REGARDING SAME	0.90	
09/20/23	MJN	REVIEW DOCUMENTATION FROM DSI REGARDING DEMANDS	0.70	
09/20/23	MJN	FOLLOW UP WITH T. CARUSO REGARDING LITIGATION TARGETS. [.3 NO CHARGE]	0.00	N/C
09/21/23	BGR	FOLLOW-UP ON MOTION TO EXPAND RECEIVERSHIP	0.90	
09/21/23	BGR	ATTEND TO DEMAND LETTER EDITS	0.70	
09/21/23	KLB	UPDATE STATUS CHART REGARDING DEMAND LETTERS SENT TO ADVISORS AND REVIEW EMAIL FROM D. STERMER REGARDING SERVICE OF DEMAND LETTERS	0.50	
09/21/23	KLB	REVISE DEMAND LETTERS TO KATCHIS FAMILY AND F. SIMAN AND COMPILE EXHIBITS TO SAME; FINALIZE AND FORMAT DEMAND LETTERS AND PREPARE FOR SERVICE BY FIRST CLASS AND CERTIFIED MAIL; UPDATE STATUS CHART TO INCLUDE NEW DEMAND LETTERS	0.90	
09/21/23	KLB	REVIEW EMAILS REGARDING BACKUP FOR DEMAND LETTERS PREVIOUSLY SENT TO ADVISORS AND EMAILS REGARDING SAME [.2 NO CHARGE]	0.00	N/C
09/21/23	KLB	REVIEW RETURNED MAIL SENT TO J. PALUZZI AND CONDUCT RESEARCH TO LOCATE BETTER ADDRESS FOR SAME (.3); REVISE AND FINALIZE DEMAND LETTER AND FINALIZE AND PREPARE FOR SERVICE BY FIRST CLASS AND CERTIFIED MAIL (.3)	0.60	
09/21/23	MJN	REVIEW AND REVISE DEMAND LETTERS; CORRESPOND WITH D. STERMER REGARDING THE SAME.	1.00	
09/21/23	WOD	ANALYZE FINANCIAL DOCUMENTS RE: TRANSFEREE COMMISSIONS TO RESPOND TO DEMAND LETTERS.	0.50	
09/22/23	WOD	ANALYZE DOCUMENTS FROM CLIENT RELATING TO COMMISSIONS RECEIVED BY INSURANCE AGENT TO PREPARE REPLY LETTERS TO MS. SCHINDLER, ESQ. CLIENT LETTERS.	2.00	
09/24/23	BGR	WORK ON LITIGATION DRAFT COMPLAINT/DEMANDS	0.90	
09/25/23	BGR	WORK ON CONSENT JUDGMENT ISSUES FOR OFR	0.90	
09/25/23	BGR	WORK ON DRAFT COMPLAINT AND DOCUMENT ISSUES	0.80	

F E E S

Date	Attorney	Description	Hours	
09/26/23	BGR	ATTEND TO MOTION TO EXPAND RECEIVERSHIP ISSUES/DRAFTS	0.90	
09/26/23	BGR	ATTEND TO RESPONSE TO DEMAND LETTERS AND COMPLAINTS	0.70	
09/26/23	GCG	ANALYZE PROTECTIVE ORDER REQUEST AND ISSUES (.4); STRATEGY CONFERENCE WITH K. BURNS AND M. NILES REGARDING REVIEW OF PRODUCTIONS AND SUBPOENAS (.6); FOLLOW UP WITH CLIENT TEAM REGARDING SAME (.2)	1.20	
09/26/23	GCG	DRAFT PROPOSED STIPULATED PROTECTIVE ORDER (1.4); DRAFT JOINT MOTION FOR ENTRY OF STIPULATED PROTECTIVE ORDER (.8)	2.20	
09/26/23	MJN	CORRESPOND WITH W. DIAB REGARDING RESPONSE TO DEMAND LETTER RESPONSES. [.4 NO CHARGE]	0.00	N/C
09/26/23	WOD	ANALYZE ██████████ DOCUMENTS AND DRAFT REPLY TO ██████████ DEMAND LETTER.	1.00	
09/27/23	BGR	WORK ON FEE MOTION ISSUES AND ANALYSIS	1.60	
09/27/23	BGR	ATTEND TO LITIGATION DRAFTS AND EDITS	1.80	
09/27/23	GCG	WORK ON MOTION FOR PROTECTIVE ORDER AND PROPOSED STIPULATED PROTECTIVE ORDER AND RELATED EMAILS/CALLS WITH D. STERMER AND B. RICH	0.80	
09/27/23	WOD	ANALYZE EMAILS, ENGAGEMENT LETTERS, AND CASH DISBURSEMENT JOURNALS TO INSURANCE AGENTS TO PREPARE DEMAND LETTERS.	0.50	
09/28/23	BGR	WORK ON DEMAND LETTER REPSONSE ISSUES	0.90	
09/28/23	KLB	REVIEW EMAILS REGARDING MOTIONS FOR FEES AND EXPENSES AND TELEPHONE CONFERENCE WITH B. RICH REGARDING SAME	0.20	
09/28/23	KLB	REVIEW FEE AND EXPENSE BREAKDOWN AND EMAILS FROM D. STERMER TO G. MELCHIOR REGARDING SAME; REVISE BERGER SINGERMAN SECOND INTERIM MOTION FOR FEES AND EXPENSES	0.70	
09/28/23	KLB	REVISE SECOND INTERIM MOTION FOR FEES AND EXPENSES OF DEVELOPMENT SPECIALISTS, INC. AND REVISE SECOND INTERIM MOTION FOR FEES OF CORPORATE MONITOR; REVISE SECOND INTERIM MOTION FOR FEES AND EXPENSES OF E-FORENSICS AND EMAILS TO B. RICH WITH REVISED DRAFT FEE MOTIONS	1.40	
09/28/23	KLB	FURTHER REVISE SECOND INTERIM MOTION FOR FEES OF DEVELOPMENT SPECIALISTS, INC, BERGER	0.60	

F E E S

Date	Attorney	Description	Hours	
		SINGERMAN AND CORPORATE MONITOR AND TELEPHONE CALL TO D. STERMER REGARDING COMMENTS TO DSI'S SECOND FEE MOTION		
09/28/23	MJN	CORRESPOND WITH W. DIAB REGARDING ADDITIONAL TARGETS; FOLLOW UP WITH T. CARUSO REGARDING THE SAME. [.6 NO CHARGE]	0.00	N/C
09/29/23	BGR	WORK ON REDACTIONS FOR FEES [.9 NO CHARGE]	0.00	N/C
09/29/23	KLB	REVIEW EMAILS FROM D. STERMER WITH FURTHER REVISED MOTION FOR FEES OF CORPORATE MONITOR AND DEVELOPMENT SPECIALISTS, INC., AND REDACTIONS; FORMAT MOTIONS AND EXHIBITS AND EMAILS TO B. RICH	0.50	
09/29/23	WOD	CONDUCT DETAILED ANALYSIS OF EMAILS AND ATTACHMENTS RELATING TO AGENTS ██████████ AND DONOFF.	1.00	
10/01/23	MJN	REVIEW FEE STATEMENT AND MOTION ON FEE APPLICATION.	0.50	
10/02/23	BGR	WORK ON MULTIPLE FEE MOTION ISSUES/WORK ON RESOLUTIONS	0.90	
10/02/23	KLB	REDACT INVOICES OF BERGER SINGERMAN TO BE ATTACHED TO SECOND INTERIM MOTION FOR FEES AND EXPENSES AS COUNSEL TO CORPORATE MONITOR; EMAILS TO TEAM WITH DRAFT FEE MOTIONS AND REDACTED INVOICES	0.60	
10/02/23	KLB	REVIEW EMAIL REGARDING COMMENTS TO MOTION TO EXPAND RECEIVERSHIP	0.20	
10/02/23	KLB	REVIEW EMAIL FROM D. STERMER REGARDING ADDITIONAL REDACTIONS TO BERGER SINGERMAN FEE INVOICE AND FINALIZE AND REDACT SAME; EMAILS FROM D. STERMER REGARDING REDACTIONS TO E-FORENSICS' INVOICE	0.50	
10/02/23	KLB	REVIEW EMAIL FROM G. GAUKROGER REGARDING FILING OF RECEIVERSHIP ORDER AND PREPARE NOTICE OF FILING OF SAME TO BE FILED IN CASE OF D. ABRAMSON V. NATIONAL SENIOR INSURANCE, INC.	0.70	
10/02/23	KLB	FINALIZE, FORMAT AND E-FILE NOTICE OF FILING ORDER APPOINTING RECEIVER IN CIRCUIT COURT CASE OF D. ABRAMSON V. NATIONAL SENIOR INSURANCE, INC., ET AL.	0.20	
10/02/23	KLB	TELEPHONE CALL WITH G. GAUKROGER REGARDING STATUS OF SECOND INTERIM FEE MOTIONS [.1 NO CHARGE]	0.00	N/C
10/02/23	GCG	REVIEW AND ANALYZE MOTION TO WITHDRAW	0.40	

F E E S

Date	Attorney	Description	Hours	
		FILED BY S. ORTH (.1); CLIENT-RELATED EMAILS (.2); REVIEW AND APPROVE NOTICE OF FILING RECEIVERSHIP ORDER (.2); REVIEW AND ANALYZE MOTIONS FOR PROFESSIONALS' FEES AND COSTS (.1 NO CHARGE)		
10/02/23	MJN	CORRESPOND WITH W. DIAB REGARDING FRAUD SCHEME. [.5 NO CHARGE]	0.00	N/C
10/02/23	WOD	CALL WITH M. NILES TO DISCUSS EVIDENCE ON AGENT COMMISSIONS AND CASE THEORY.	0.50	
10/03/23	BGR	WORK ON FEE MOTION	0.80	
10/03/23	MJN	REVIEW FRAUD PRESENTATION	0.70	
10/03/23	MJN	CONFERENCE CALL WITH TAYLOR CARUSO AND W. DIAB TO DISCUSS DEMAND LETTERS AND FRAUD ISSUES.	0.80	
10/03/23	WOD	REVIEW FILES PROVIDED BY CLIENT TO DATE AND PREPARE LIST OF QUESTIONS FOR CLIENT ON LITIGATION STRATEGY MOVING FORWARD.	1.00	
10/03/23	WOD	CONFERENCE CALL WITH TAYLOR CARUSO AND MIKE NILES RE: CASE STRATEGY. [1.1 NO CHARGE]	0.00	N/C
10/04/23	BGR	WORK ON LITIGATION AND DEMAND LETTER RESPONSE ISSUES	0.90	
10/04/23	BGR	WORK ON DRAFT COMPLAINT ISSUES	1.20	
10/04/23	KLB	INITIAL PREPARATION OF RECEIVER'S SECOND REPORT	1.30	
10/04/23	GCG	STRATEGY REGARDING CLAWBACK AND 726 DEMANDS WITH W. DIAB	0.50	
10/04/23	MJN	REVIEW FRAUD PRESENTATION FROM T. CARUSO; CONFERENCE CALL TO DISCUSS THE SAME.	2.00	
10/04/23	WOD	ATTEND FRAUD WALKTHROUGH PRESENTATION WITH CLIENT EXPLAINING FACTS OF LIFE INSURANCE/PROMISSORY NOTE FRAUD.	1.10	
10/05/23	BGR	FOLLOW-UP ON DEADLINES FOR WITNESS DISCLOSURE AND MEDIATORS	0.90	
10/05/23	KLB	REVIEW EMAIL FROM B. RICH AND TELEPHONE CONFERENCE WITH M. NILES REGARDING MOTION TO EXTEND DEADLINES IN PROCEDURES ORDER (.1); REVIEW JUDGE'S PROCEDURES REGARDING SUBMISSION OF EXPARTE MOTIONS (.1); REVISE MOTION TO EXTEND DEADLINES AND FINALIZE MOTION AND PROPOSED ORDER (.3); PREPARE COVER LETTER TO JUDGE HARPER (.3); AND FINALIZE,	1.30	

F E E S

Date	Attorney	Description	Hours	
		FORMAT AND E-FILE MOTION (.2); FINALIZE AND SUBMIT COVER LETTER AND PROPOSED ORDER AND PREPARE EMAIL TO COUNSEL FOR SERVICE OF MOTION, PROPOSED ORDER AND COVER LETTER (.3)		
10/05/23	MJN	PREPARE EX-PARTE MOTION TO EXTEND MEDIATOR AND KEY WITNESS DEADLINE.	1.00	
10/06/23	BGR	LITIGATION CLAIM ANALYSIS ISSUES	1.20	
10/06/23	BGR	LITIGATION ANALYSIS/COMPLAINT DRAFT REVISIONS [1.2 NO CHARGE]	0.00	N/C
10/06/23	BGR	ANALYZE NET WINNER NET LOSER ANALYSIS FOR POTENTIAL RECOVERY	0.90	
10/06/23	GCG	ANALYZE SUBPOENA AND DRAFT SHORT LIST OF KEY TOPICS (.8); STRATEGY CONFERENCE WITH T. CARUSO AND M. NILES AND FOLLOW UP REGARDING SAME (.8)	1.60	
10/06/23	MJN	REVIEW CORRESPONDENCE FROM R. SCHINDLER REGARDING MR. PALUZZI; CORRESPOND WITH TEAM REGARDING THE SAME.	0.50	
10/09/23	BGR	ATTEND TO DEMAND LETTER/LITIGATION ISSUES	0.90	
10/09/23	BGR	ATTEND TO MEDIATOR SELECTION ISSUES	0.80	
10/09/23	KLB	REVIEW EMAIL FROM RECEIVER REGARDING FURTHER REDACTED TIME ENTRIES AND REVISE SECOND INTERIM FEE AND EXPENSE MOTION OF BERGER SINGERMAN; FORMAT APPLICATIONS AND EMAILS TO D. STERMER WITH SAME [.5 NO CHARGE]	0.00	N/C
10/09/23	KLB	FINALIZE FOUR FEE AND EXPENSE MOTIONS, COMPILE EXHIBITS TO SAME AND FORMAT FOR FILING; EMAILS TO B. RICH AND D. STERMER REGARDING SAME AND REVIEW EMAILS REGARDING PREPARATION OF AFFIDAVIT OF REASONABLENESS AS TO BERGER SINGERMAN'S FEES; REVIEW EMAIL FROM D. STERMER REGARDING EXECUTED AFFIDAVIT AS TO CORPORATE MONITOR'S FEES	0.60	
10/10/23	BGR	PARTICIPATE IN TEAMS CALL WITH PAT O'MALLEY, TAYLOR CARUSO, AND GABRIA BRENNER AND CLIENT REGARDING STATUS OF VARIOUS INVESTIGATIONS AND RESEARCH AND NEXT STEPS REGARDING SAME, EXPANSION RELATED ISSUES, AND NEXT STEPS RELATED ISSUE	0.70	
10/10/23	BGR	WORK ON LITIGATION ANALYSIS ISSUES	1.30	
10/10/23	BGR	FINZALIZE FEE MOTION ISSUES [.4 NO CHARGE]	0.00	N/C
10/10/23	KLB	PREPARE AFFIDAVIT OF REASONABLENESS OF	0.60	

F E E S

Date	Attorney	Description	Hours	
		BERGER SINGERMAN FEES AND EXPENSES AND EMAILS TO B. RICH; EMAILS REGARDING FILING OF SECOND FEE AND EXPENSE MOTIONS		
10/10/23	KLB	PREPARE NOTICES OF FILING OF TWO AFFIDAVITS OF REASONABLENESS AS TO FEES OF BERGER SINGERMAN AND CORPORATE MONITOR/DEVELOPMENT SPECIALISTS, INC.	0.30	
10/10/23	KLB	REVIEW AND RESPOND TO EMAILS FROM T. CARUSO REGARDING SUBPOENAS ISSUED TO INSURANCE COMPANIES AND CONDUCT RESEARCH REGARDING STATUS OF PRODUCTION	0.40	
10/10/23	KLB	E-FILE FOUR SECOND INTERIM FEE AND EXPENSE MOTIONS FOR BERGER SINGERMAN, CORPORATE MONITOR, DEVELOPMENT SPECIALISTS, INC., AND E-FORENSICS AND PREPARE FOR SERVICE OF SAME	0.70	
10/10/23	GCG	LATE PARTICIPATION IN TEAMS CALL WITH PAT O'MALLEY, TAYLOR CARUSO, AND GABRIA BRENNER AND BRIAN RICH, DAN STERMER, AND WILLIAM DIAB REGARDING STATUS OF VARIOUS INVESTIGATIONS AND RESEARCH AND NEXT STEPS REGARDING SAME, EXPANSION RELATED ISSUES, AND NEXT STEPS RELATED ISSUES. [.4 NO CHARGE]	0.00	N/C
10/10/23	GCG	STRATEGY CONFERENCE WITH B. RICH REGARDING ACTION ITEMS (.4); OUTLINE DISCOVERY TO E. HOLTZ TRUST, S. HOLTZ AND A. HOLTZ AND RELATED EMAIL TO CLIENT TEAM (.5) [.9 NO CHARGE]	0.00	N/C
10/10/23	MJN	REVIEW EMAILS PROVIDED BY T. CARUSO REGARDING FD TARGETS; FOLLOW UP WITH TAYLOR REGARDING THE SAME.	0.80	
10/10/23	WOD	PARTICIPATE IN TEAMS CALL WITH PAT O'MALLEY, TAYLOR CARUSO, AND GABRIA BRENNER AND BRIAN RICH, GAVIN GAUKROGER, AND DANIEL STERMER REGARDING STATUS OF VARIOUS INVESTIGATIONS AND RESEARCH AND NEXT STEPS REGARDING SAME, EXPANSION RELATED ISSUES, AND NEXT STEPS RELATED ISSUES. [.7 NO CHARGE]	0.00	N/C
10/10/23	WOD	ATTEND WEEKLY STRATEGY MEETING WITH CLIENT.	1.00	
10/10/23	WOD	REVISE REPLY DEMAND LETTER TO ██████████ TO INCLUDE HISTORY OF COURT ORDERS AND IMPLICATIONS FOR STATUTE OF LIMITATIONS PURPOSED.	0.30	
10/11/23	BGR	WORK ON LITIGATION CLAIMS - ANALYSIS OF DEMANDS/DEFENSES	0.90	
10/11/23	BGR	CALL WITH OFR	0.40	

F E E S

Date	Attorney	Description	Hours
10/11/23	KLB	REVIEW AVAILABLE HEARING DATES ON COURT CALENDAR FOR FEE MOTIONS; EMAILS TO B. RICH	0.30
10/11/23	KLB	PREPARE NOTICE OF HEARING FOR HEARING ON FOUR FEE AND EXPENSE MOTIONS AND FINALIZE, FORMAT AND E-FILE SAME; UPLOAD FILED MOTIONS AND HEARING NOTICE TO ON-LINE SCHEDULING PORTAL, AND PREPARE NOTICE OF HEARING FOR SERVICE	0.70
10/12/23	BGR	ATTEND TO LITIGTAION PREPARATION ISSUES - REVIEW AND EDIT DEMAND LETTERS	0.90
10/12/23	BGR	FOLLOW-UP ON MOTION TO EXPAND RECEIVERSHIP	0.80
10/12/23	KLB	PREPARE MOTION TO EXPAND SCOPE OF RECEIVERSHIP AS TO GRACE HOLDINGS FINANCIAL AND EMAILS TO B. RICH	0.30
10/14/23	MJN	REVIEW CORRESPONDENCE FOR [REDACTED] REVIEW ADDITONAL EMAILS FROM T. CARUSO	0.40
10/15/23	MJN	REVIEW AND REVISE STATUS REPORT	0.60
10/16/23	BGR	WORK ON CONFIDENTIALITY ORDER	0.90
10/16/23	BGR	REVIEW MOTIONS TO EXPAND RECEIVERSHIP	0.90
10/16/23	MAH	REVIEW AND OFFER EDITS TO PROPOSED COMMUNICATION TO NOTE-HOLDERS AND PARTIES IN INTEREST	0.10
10/16/23	GCG	REVIEW AND REVISE DRAFT UPDATE LETTER TO NOTEHOLDERS	0.20
10/16/23	WOD	RECEIPT AND REVIEW OF ANALYSIS OF [REDACTED] [REDACTED]	0.20
10/17/23	BGR	COMMUNICATIONS TO/FROM/WITH CLIENT AND AND JEFF BAXTER REGARDING LUCENKO MATTER AND PARTICIPATE IN TEAMS CALL WITH CLIENT AND JEFF BAXTER REGARDING LUCENKO MATTER	0.60
10/17/23	BGR	FURTHER EDITS TO MOTION TO EXPAND RECEIVERSHIP	0.90
10/17/23	BGR	WORK ON RECEIVER REPORT ISSUES	0.90
10/17/23	BGR	ATTEND TO CONFIDENTIALITY AGREEMENT FOR BANK RECORDS	0.80
10/17/23	KLB	PREPARE INITIAL LIST OF POTENTIAL LITIGATION TARGETS FOR PURPOSES OF MEDIATOR'S CONFLICTS CHECK, AND EMAILS TO AND FROM PROPOSED MEDIATOR REGARDING SAME	0.60
10/17/23	KLB	TELEPHONE CALL TO FLORIDA CHIEF FINANCIAL	1.20

F E E S

Date	Attorney	Description	Hours	
		OFFICER'S OFFICE WITH RESPECT TO SUBMISSION OF SUBPOENAS DIRECTED TO CHIEF FINANCIAL OFFICER, AS REGISTERED AGENT FOR INSURANCE COMPANIES (.1); REVIEW INFORMATION ON WEBSITE REGARDING CONFIRMATION OF SERVICE OF PROCESS (.1); GATHER INFORMATION FOR RELIASTAR, SECURITY LIFE OF DENVER, AND AMERICAN GENERAL LIFE INSURANCE COMPANY AND CONTACT EACH REGARDING STATUS OF DOCUMENT PRODUCTION (.9); EMAILS TO AND FROM T. CARUSO REGARDING STATUS (.1)		
10/17/23	KLB	PREPARE SUBPOENAS TO ERIC HOLTZ TRUST, SHANNON HOLTZ, AND ALEX HOLTZ AND CONDUCT RESEARCH REGARDING INFORMATION TO COMPLETE SUBPOENAS (.8); EMAILS TO TEAM WITH DRAFT SUBPOENAS (.1)	0.90	
10/17/23	KLB	CONTINUED PREPARATION OF INITIAL DRAFT OF RECEIVER'S SECOND INTERIM REPORT AND EMAILS TO B. RICH	0.40	
10/17/23	KLB	PREPARE PROPOSED ORDER GRANTING MOTION TO EXPAND RECEIVERSHIP TO INCLUDE GRACE HOLDINGS AND EMAILS TO B. RICH	0.50	
10/17/23	KLB	EMAILS TO AND FROM B. RICH REGARDING AFFIDAVIT OF REASONABLENESS OF BERGER SINGERMAN'S ATTORNEYS' FEES (.1); REVISE TWO NOTICES OF FILING OF AFFIDAVITS OF REASONABLENESS AS TO FEES OF BERGER SINGERMAN, DSI AND CORPORATE MONITOR (.3); FINALIZE, FORMAT AND E-FILE NOTICES OF FILING (.2) [.6 NO CHARGE]	0.00	N/C
10/17/23	KLB	EMAILS REGARDING PREPARATION OF DECLARATION OF D. STERMER IN SUPPORT OF MOTION TO EXPAND RECEIVERSHIP TO INCLUDE GRACE HOLDINGS (.1); PREPARATION OF INITIAL DRAFT OF DECLARATION AND EMAILS TO B. RICH (.4)	0.50	
10/17/23	MJN	REVIEW AND PROVIDE COMMENTS TO MOTION TO EXPAND RECEIVERSHIP. [.4 NO CHARGE]	0.00	N/C
10/17/23	MJN	REVIEW CONFIDENTIALITY AGREEMENT.	0.40	
10/17/23	WOD	RECEIPT AND REVIEW OF DETAILED CORRESPONDENCES AND MEMORANDUMS OF ROSE SCHINDLER'S REPRESENTATION OF RECEIVERSHIP ENTITIES.	0.50	
10/17/23	WOD	ANALYZE ADVISOR COMMISSION STATEMENTS AND RESEARCH SEC DEFINITIONS OF REGISTERED SECURITIES AND RIA.	1.00	

F E E S

Date	Attorney	Description	Hours
10/18/23	BGR	WORK ON EXPANSION OF RECEIVERSHIP ISSUES	0.70
10/18/23	BGR	LITIGATION ISSUES AND UPDATE	0.90
10/18/23	BGR	WORK ON REPORT ISSUES - PROVIDE EDITS/COMMENTS TO DRAFTS	0.80
10/18/23	KLB	TELEPHONE CALL FROM S. MASSEY REGARDING SUBPOENA DIRECTED TO RELIASTAR AND EMAILS TO S. MASSEY REGARDING SAME; EMAILS TO T. CARUSO REGARDING STATUS	0.40
10/18/23	KLB	REVIEW PROCEDURES ORDER AND EMAILS REGARDING MEDIATOR SELECTIONS; PREPARE NOTICE OF SELECTION OF MEDIATORS AND EMAILS TO B. RICH	0.80
10/18/23	KLB	PREPARE KEY WITNESS LIST AND REVIEW PROCEDURES ORDER REGARDING SAME	0.80
10/18/23	KLB	REVISE RECEIVER'S SECOND REPORT AND FINALIZE SAME; COMPILE EXHIBITS AND EMAILS TO AND FROM B. RICH AND D. STERMER REGARDING FILING AND SERVICE	0.30
10/18/23	GCG	REVIEW AND REVISE DRAFT MOTION TO EXPAND RECEIVERSHIP AND RELATED CLIENT EMAIL MEMO	0.40
10/18/23	MJN	REVIEW PRIOR CORRESPONDENCE AND ORDERS, AND DOCUMENTS PERTAINING TO LANDLORD ADMINISTRATIVE CLAIM.	0.40
10/18/23	MJN	REVIEW WAIVER OF CONFLICT LETTERS AND REVISE ACCORDINGLY.	0.40
10/18/23	MJN	REVIEW DOCUMENTS AND INFORMAITON PROVIDED BY DSI AND FROM W. DIAB; FOLLOW UP WITH W. DIAB REGARDING THE SAME.	1.30
10/18/23	WOD	ANALYZE RECEIVERSHIP ENTITY EMAILS AND FILES IN CLOUD9 DATABASE TO COLLECT INFORMATION ON COMPENSATION STRUCTURE OF ADVISORS, PREPARE REPLY DEMAND LETTERS TO ADVISORS, AND PREPARE FRAUDULENT TRANSFER COMPLAINTS AGAINST ADVISORS.	4.00
10/18/23	WOD	EXCHANGE DETAILED CORRESPONDENCES INCLUDING ANALYSIS OF PROMISSORY NOTE AND COMMISSION SCHEME WITH INTERNAL WORKING GROUP, AND DISCUSS STRATEGY FOR COMPLAINTS AND DEMAND LETTERS.	0.40
10/19/23	BGR	ATTEND TO LITTGATION ANALYSIS ISSUES	2.50
10/19/23	KLB	EMAILS FROM AND TO D. STERMER REGARDING MAILING OF RECEIVER'S REPORT TO CREDITORS	0.20

F E E S

Date	Attorney	Description	Hours
		WITH NO ADDRESSES; GATHER SERVICE LISTS FOR SERVICE UPON CREDITORS WITHOUT E-MAIL ADDRESSES	
10/19/23	KLB	REVISE NOTICE OF SELECTION OF MEDIATOR AND EMAILS TO B. RICH	0.20
10/19/23	WOD	ATTEND CONFERENCE CALL WITH DSI TO DISCUSS ADVISOR TRANSFERS AND COMMISSION SCHEME AND DOCUMENT NEEDED TO FINALIZE COMPLAINTS AND DEMAND LETTER REPLIES.	1.00
10/19/23	WOD	CONTINUING ANALYZING BOOKS AND RECORDS TO DETERMINE PAYMENTS MADE TO ADVISORS [REDACTED] DONOFF, AND [REDACTED]	0.80
10/20/23	KLB	E-FILE RECEIVER'S SECOND REPORT AND PREPARE FOR SERVICE	0.30
10/20/23	WOD	ANALYZE COMPENSATION AND COMMISSION SUMMARIES FOR [REDACTED] TO PREPARE REPLY TO DEMAND LETTER.	0.80
10/21/23	WOD	REVISE DRAFT COMPLAINT AGAINST ADVISORS; CONFIRM ALLEGATIONS, PREPARE FOR LITIGATION AGAINST APPROX. 10 ADVISORS.	4.00
10/22/23	MJN	REVIEW REVISED COMPLAINT AND RESPONSE TO R. SCHINDLER. CORRESPOND WITH W. DIAB REGARDING THE SAME.	1.00
10/23/23	BGR	REVIEW AND UPDATE LITIGATION ANALYSIS ISSUES	1.20
10/23/23	BGR	ATTEND TO LUCENKO AND OMDCELL ISSUES; REVIEW SAME FOR IMPACT ON ESTATE AS TO [REDACTED]	0.80
10/23/23	KLB	REVISE SUBPOENA TO TRANSAMERICA LIFE INSURANCE CO. AND FINALIZE SAME; SUBMIT VIA FLORIDA CHIEF FINANCIAL OFFICER'S WEBSITE	0.50
10/23/23	KLB	TELEPHONE CALL TO SECURITY LIFE OF DENVER LIFE INSURANCE AND AMERICAN GENERAL LIFE INSURANCE REGARDING STATUS OF SUBPOENAS AND PRODUCTION OF DOCUMENTS	0.20
10/23/23	KLB	REVISE THREE SUBPOENA AND THREE NOTICES OF INTENT TO SERVE SUBPOENAS UPON ERIC HOLTZ LIVING TRUST, SHANNON HOLTZ, AND ALEXANDRA HOLTZ AND FINALIZE, FORMAT AND E-FILE THREE NOTICES OF INTENT	0.50
10/23/23	GCG	WORK ON STIPULATION RE CONFIDENTIALITY (.6); WORK ON DRAFT CONFIDENTIALITY AGREEMENT (.6); PREPARE REDLINES AND RELATED CLIENT EMAILS (.3); FURTHER CLIENT E-MAILS REGARDING SERVICE IDEAS (.1)	1.60

F E E S

Date	Attorney	Description	Hours	
10/23/23	GCG	DRAFT NOTICES OF INTENT TO SERVE SUBPOENAS (3X) (.7); REVISE DRAFT SUBPOENAS TO A HOLTZ, S HOLTZ AND ERIC HOLTZ LIVING TRUST (.8); FOLLOW UP REGARDING SAME (.2)	1.70	
10/23/23	GCG	STRATEGY REGARDING ACTION ITEMS WITH M. NILES (.2) (NC)	0.00	N/C
10/23/23	MJN	FURTHER REVIEW LETTERS AND DRAFT COMPLAINT.	0.40	
10/23/23	MJN	CORRESPOND WITH K.BURNS REGARDING TRANSAMERICA LIFE INSURANCE SUBPOENA AND OTHER SUBPOENAS.	0.40	
10/23/23	WOD	DRAFT DETAILED CORRESPONDENCE TO CLIENT RE: MODEL COMPLAINT AGAINST ADVISORS AND POTENTIAL CONFLICT OF INTEREST WITH ROSE SCHINDLER.	0.50	
10/24/23	BGR	TEAM LITIGATION CALL ON STRATEGY	1.00	
10/24/23	BGR	WORK ON DRAFT COMPLAINT ISSUES - REVIEW AND EDIT	0.80	
10/24/23	BGR	WORK ON DRAFT COMPLAINTS FOR FILING	1.80	
10/24/23	KLB	REVISE AND FINALIZE NOTICE OF SELECTION OF MEDIATORS AND FORMAT AND E-FILE SAME; PREPARE FOR SERVICE BY E-MAIL	0.30	
10/24/23	KLB	EMAILS FROM AND TO B. RICH REGARDING DEMAND LETTERS SENT TO ADVISORS, ETC. AND DISCUSSIONS WITH M. NILES REGARDING FILING OF COMPLAINTS FOR FRAUDULENT TRANSFERS [.2 NO CHARGE]	0.00	N/C
10/24/23	KLB	DISCUSSIONS WITH M. NILES REGARDING FILING OF COMPLAINTS AND REVIEW PROCEDURES ORDER (.2); PREPARE SIX NOTICES OF FILING OF PROCEDURES ORDER AND PREPARE SIX SUMMONSES (1.3)	1.50	
10/24/23	KLB	PREPARE SIX CIVIL COVERSHEETS FOR COMPLAINTS AND REVIEW RULES REGARDING NOTICE OF RELATED CASE; REVIEW FLORIDA RULES AND TELEPHONE CALL TO CLERK OF CIRCUIT COURT	0.60	
10/24/23	GCG	PARTICIPATE IN TEAMS CALL WITH PAT O'MALLEY (PARTIAL), TAYLOR CARUSO, AND GABRIA BRENNER AND BRIAN RICH, MICHAEL NILES, WILLIAM DIAB, AND DANIEL STERMER REGARDING RECOVERY RELATED ISSUES/INVESTIGATIONS AND NEXT STEPS AND ISSUES RELATED TO SAME. [1.0 NO CHARGE]	0.00	N/C
10/24/23	GCG	CLIENT EMAILS AND EMAIL TO OFR WITH DRAFT CONFIDENTIALITY AND PROTECTIVE ORDERS (.2)	0.20	
10/24/23	GCG	ADDRESS ISSUES WITH BANK OF UTAH SUBPOENA	0.10	

F E E S

Date	Attorney	Description	Hours	
10/24/23	GCG	INTERNAL STATUS EMAILS TO/FROM B. RICH (NC)	0.00	N/C
10/24/23	GCG	REVIEW AND ANALYZE AND ADVISE REGARDING FURTHER CAUSES OF ACTION FOR ADVISOR COMPLAINTS	0.40	
10/24/23	MJN	FURTHER REVIEW AND REVISE DRAFT COMPLAINTS.	0.90	
10/24/23	MJN	REVIEW REVISED RESPONSE LETTERS TO R. SCHINDLER; CORRESPOND WITH W. DIAB REGARDING THE SAME.	0.60	
10/24/23	MJN	PARTICIPATE IN TEAMS CALL WITH PAT O'MALLEY (PARTIAL), TAYLOR CARUSO, AND GABRIA BRENNER AND BRIAN RICH, DAN STERMER WILLIAM DIAB, AND GAVIN GAUKROGER REGARDING RECOVERY RELATED ISSUES/INVESTIGATIONS AND NEXT STEPS AND ISSUES RELATED TO SAME. [1.0 NO CHARGE]	0.00	N/C
10/24/23	WOD	ATTEND STRATEGY MEETING WITH CLIENT AND LITIGATION TEAM RE: RECOVERY PLAN AND POTENTIAL CLAIMS.	1.00	
10/24/23	WOD	REVISE DRAFT FORM COMPLAINT TO PREPARE FOR FILING AND DEMAND LETTER REPLIES TO [REDACTED] AND R. DONOFF TO PREPARE FOR SENDING.	2.00	
10/25/23	BGR	WORK ON COMPLAINTS TO BE FILED	1.60	
10/25/23	BGR	FURTHER ANALYSIS ON FRAUDULENT TRANSFER CLAIMS	1.20	
10/25/23	KLB	REVIEW EMAIL REGARDING REVISIONS TO COMPLAINT AND REVISE FORM OF COMPLAINT; REVISE CIVIL COVER SHEETS AND SUMMONSES	0.50	
10/25/23	KLB	REVIEW EMAILS FROM L. BUTON OF RESOLUTION LIFE REGARDING SUBPOENAS DIRECTED TO RELIASTAR AND SECURITY LIFE OF DENVER; EMAILS TO AND FROM B. RICH	0.20	
10/25/23	KLB	PREPARE COMPLAINTS TO BE FILED AGAINST ADVISORS AND PREPARE EXHIBIT B (LIST OF TRANSFERS) FOR EACH (1.3); PREPARE NOTICES OF FILING OF PROCEDURES ORDER FOR EACH ACTION AND TELEPHONE CALL TO CLERK REGARDING LOGISTICS RELATING TO FILING OF SUPPLEMENTAL PROCEEDINGS (.7)	2.00	
10/25/23	KLB	TELEPHONE CONFERENCES WITH M. NILES AND G. GAUKROGER REGARDING FILING OF COMPLAINTS (.2); REVIEW G. GAUKROGER'S COMMENTS AND REVISE FIVE COMPLAINTS (.3); DISCUSSIONS RELATING TO FILING OF NOTICE OF RELATED CASES AND REVIEW RULES OF JUDICIAL ADMINISTRATION	3.50	

F E E S

Date	Attorney	Description	Hours
		(.1); REVISE NOTICES OF FILING OF PROCEDURES ORDER TO INCLUDE NOTICE OF RELATED CASES (.6); FINALIZE FRAUDULENT TRANSFER COMPLAINTS AND FORMAT FOR FILING (.4); FINALIZE SUMMONSES AND FORMAT FOR FILING (.3); FINALIZE NOTICES OF RELATED CASES AND NOTICE OF FILING OF PROCEDURES ORDER AND COMPILE ATTACHMENT, FORMAT FOR SUBMISSION (.3); E-FILE FIVE COMPLAINTS, NOTICES OF RELATED CASES/FILING OF PROCEDURES ORDER, AND SUMMONSES (1.3)	
10/25/23	GCG	ADDRESS SUBPOENA COMPLIANCE ISSUES REGARDING REQUEST FOR PAYMENT (.4); REVIEW AND PROPOSE REVISIONS TO DRAFT COMPLAINTS AND STRATEGY WITH M. NILES AND K. BURNS REGARDING SAME (.8); ANALYZE SUBPOENA CONFIRMATION ISSUE (.2); REVIEW CASE ASSIGNMENT RULES (.2);	1.60
10/25/23	MJN	CORRESPOND WITH TEAM REGARDING COMPLAINTS; FOLLOW UP WITH D. STERMER REGARDING THE SAME; FOLLOW UP WITH W. DIAB REGARDING RESPONSE LETTERS; REVIEW DOCUMENTS IN CLOUD 9.	3.00
10/25/23	MJN	REVIEW NOTICE OF FILING AND OTHER ANCILLARY FILINGS.	0.40
10/25/23	WOD	RECEIPT AND REVIEW OF SPREADSHEET FROM CLIENT NOTING ALL PROMISSORY NOTE SALES BY ADVISORS.	0.30
10/26/23	BGR	REVIEW DEMAND LETTERS	0.90
10/26/23	BGR	ATTEND TO FILED COMPLAINT AND MEDIATION PROCEDURE ISSUES	0.80
10/26/23	KLB	EMAILS FROM B. RICH TO R. KOBERT WITH FILED COMPLAINTS AND NOTICE OF SELECTION OF MEDIATORS	0.30
10/26/23	KLB	REVISE LIST OF KEY WITNESSES AND REVIEW EMAILS FROM B. RICH AND G. GAUKROGER REGARDING SAME	0.80
10/26/23	KLB	PREPARE INITIAL DRAFT OF ORDER GRANTING MOTION TO APPROVE SECOND INTERIM FEES AND EXPENSES OF BERGER SINGERMAN (.5); PREPARE INITIAL DRAFT OF ORDER GRANTING MOTION TO APPROVE SECOND INTERIM FEES OF E-FORENSICS (.3); PREPARE INITIAL DRAFTS OF ORDER GRANTING SECOND MOTION TO APPROVE FEES AND EXPENSES OF CORPORATE MONITOR, AND ORDER GRANTING SECOND MOTION TO APPROVE FEES AND EXPENSES	1.70

F E E S

Date	Attorney	Description	Hours	
		OF DEVELOPMENT SPECIALISTS INC. (.8); EMAILS TO AND FROM B. RICH WITH PROPOSED FEE ORDERS (.1)		
10/26/23	MJN	REVIEW KEY WITNESS LISTS AND RESEARCH REGARDING THE SAME.	0.30	
10/26/23	PH	CREATING DOCUMENT COMPILING LAW ON VIABLE CAUSES OF ACTION.	2.90	
10/27/23	BGR	ATTEND TO REVISED COMPLAINT ISSUES	0.80	
10/27/23	BGR	WORK ON LITIGATION CLAIM ANALYSIS AND DRAFT REPSONSE TO SCHINDLER	1.20	
10/27/23	KLB	MULTIPLE CALLS AND DISCUSSIONS WITH CLERK OF PALM BEACH CIRCUIT COURT REGARDING FILING OF COMPLAINTS AS SUPPLEMENTAL PROCEEDINGS	0.30	
10/27/23	KLB	REVISE PROPOSED ORDERS AWARDING SECOND INTERIM FEES AND EXPENSES TO CORPORATE MONITOR, DEVELOPMENT SPECIALISTS, INC., BERGER SINGERMAN AND E-FORENSICS	0.30	
10/27/23	MJN	REVIEW AND ASSIST IN ISSUES WITH COMPLAINTS; REVIEW ADDITIONAL INFORMATION IN CLOUD 9.	0.50	
10/27/23	MJN	CORRESPOND WITH B. RICH AND H. KOROGLU REGARDING ADMINISTRATIVE CLAIM; FOLLOW UP DISCUSSION WITH D. STERMER AND B. RICH.	0.40	
10/27/23	WOD	ANALYZE RECEIVERSHIP ENTITY CLOUD9 DATABASE TO COLLECT EVIDENCE OF FRAUDULENT TRANSFERS.	3.00	
10/27/23	PH	DRAFTING DOCUMENT COMPILING POTENTIAL VIABLE CAUSES OF ACTION	3.10	
10/28/23	PH	DRAFT DOCUMENT COMPILING POTENTIAL VIABLE CAUSES OF ACTION. [1.2 NO CHARGE]	0.00	N/C
10/29/23	BGR	PREPARE FOR UPCOMING HEARINGS	1.20	
10/29/23	PH	DRAFT DOCUMENT COMPILING POTENTIAL VIABLE CAUSES OF ACTION.	1.00	
10/30/23	BGR	ATTEND CALL WITH MEDIATOR ON PENDING CLAIMS	0.50	
10/30/23	BGR	REVIEW AND ANALYZE LITIGATION CLAIMS	1.80	
10/30/23	KLB	GATHER PLEADINGS FOR OCTOBER 31, 2023 HEARING ON FEE MOTIONS AND PREPARE E-BINDER FOR HEARING; EMAILS TO B. RICH REGARDING SAME AND AFFIDAVITS AS TO REASONABLENESS OF FEES	0.60	
10/30/23	KLB	ATTEND CALL WITH B. RICH, D. STERMER, R. KOBERT AND E. BECKWITH REGARDING LOGISTICS FOR SCHEDULING OF MEDIATIONS, ETC.; FOLLOW UP	0.30	

F E E S

Date	Attorney	Description	Hours	
		EMAILS FROM AND TO E. BECK WITH		
10/30/23	KLB	REVISE FOUR LETTERS TO COUNSEL FOR ADVISORS REGARDING FRAUDULENT TRANSFERS, AND COMPILE AND FORMAT EXHIBITS TO SAME (.6); FINALIZE CORRESPONDENCE AND EMAILS TO R. SCHINDLER WITH SAME (.4)	1.00	
10/30/23	KLB	FINALIZE AND SUBMIT FOUR PROPOSED ORDERS AWARDING SECOND INTERIM FEES AND EXPENSES OF BERGER SINGERMAN, CORPORATE MONITOR, DEVELOPMENT SPECIALISTS, INC., AND E-FORENSICS INCORPORATED	0.60	
10/30/23	GCG	ATTENTION TO ISSUES REGARDING NEW CASE FILINGS (.2); REVIEW AND ANALYZE MEMO FROM P. HICKS (.3) [.5 NO CHARGE]	0.00	N/C
10/30/23	WOD	COLLECT EXHIBITS FOR DEMAND LETTERS TO ██████████ DONOFF, ██████████ AND PALUZZI.	0.50	
10/30/23	WOD	FINALIZE DEMAND LETTER REPLIES FOR ADVISORS ██████████ DONOFF, PALUZZI, AND ██████████	1.00	
10/30/23	PH	COMPILE LAW AND ILLUSTRATIVE CASES ON VIABLE CAUSES OF ACTION.	3.30	
10/31/23	BGR	PREPARE FOR AND ATTEND MOTION CALENDAR HEARINGS	1.50	
10/31/23	BGR	WORK ON KEY WITNESS LIST AND MEDIATION ISSUES	0.90	
10/31/23	BGR	PREPARE FOR MULTIPLE FEE HEARINGS	1.20	
10/31/23	KLB	GATHER COMPLAINTS, SUMMONSES AND NOTICES OF RELATED CASES AND ORGANIZE SAME; EMAILS TO AND FROM PROCESS SERVER REGARDING SERVICE OF PROCESS UPON DEFENDANTS	1.10	
10/31/23	GCG	ATTENTION TO NEW CASE FILINGS, SUMMONSES, AND COURT ORDERS/NOTICES REGARDING CASE FILING MATTERS	0.40	
10/31/23	GCG	REVIEW AND PROPOSE REVISIONS TO THE KEY WITNESSES LIST	0.20	
10/31/23	MJN	ATTEND HEARING ON FEE APPLICATIONS. [.6 NO CHARGE]	0.00	N/C
10/31/23	MJN	REVIEW AND REVISE KEY WITNESS LIST; CORRESPOND WITH G. GAUKROGER, K.BURNS. AND WILLIAM DIAB REGARDING THE SAME; FOLLOW UP WITH D. STERMER REGARDING ADDITIONS AND REMOVALS.	0.80	

F E E S

Date	Attorney	Description	Hours	
10/31/23	WOD	RECEIPT AND REVIEW OF NOTICE OF FILING KEY WITNESS LIST AND SUGGEST REVISIONS.	0.20	
11/01/23	BGR	WORK ON LITIGATION ANALYSIS AND DRAFTS; FOLLOW-UP ON FORM SCHEDULING ORDERS AND NEXT STEPS.	0.90	
11/01/23	BGR	FOLLOW-UP ON EXPANSION OF RECEIVERSHIP	0.30	
11/01/23	KLB	GATHER CASE PROCEDURES ORDERS ENTERED IN SUPPLEMENTAL PROCEEDINGS AND DISCUSSIONS WITH M. NILES REGARDING; EMAILS TO AND FROM D. STERMER AND EMAIL TO JUDICIAL ASSISTANT REGARDING PROCEDURES ORDER ENTERED IN OFR V. NSI CASE THAT GOVERNS ACTIONS FILED BY RECEIVER	0.40	
11/01/23	KLB	EMAILS TO AND FROM PROCESS SERVER REGARDING INCLUSION OF CASE PROCEDURES ORDERS IN SERVICE PACKAGES	0.20	
11/01/23	KLB	PREPARE LENGTHY EMAIL TO JUDICIAL ASSISTANT REGARDING ENTRY OF PROCEDURES ORDER GOVERNING ACTIONS FILED BY RECEIVER AND DISCREPANCIES AMONG DATES IN CASE PROCEDURES ORDERS ENTERED ON NOVEMBER 1, 2023; DISCUSSIONS REGARDING SAME WITH M. NILES	0.50	
11/01/23	KLB	EMAILS TO AND FROM B. RICH REGARDING FILING OF KEY WITNESS LIST; REVISE AND FINALIZE KEY WITNESS LIST AND FORMAT AND E-FILE SAME [.3 NO CHARGE]	0.00	N/C
11/01/23	MJN	FINALIZE KEY WITNESS LIST; CORRESPOND WITH TEAM REGARDING THE SAME.	0.40	
11/02/23	BGR	WORK ON CONFIDENTIALITY AGREEMENT AND NDA ISSUES FOR G. WOODFIELD AND BANK	0.90	
11/02/23	GCG	REVIEW PROOF OF CLAIM, FINANCIAL DATA, AND DRAFT DEMAND LETTER TO PELICAN (1.2); TELECONFERENCE WITH D. STERMER (.2); DRAFT PRELIMINARY DEMAND LETTER TO RECIPIENT OF MONIES FROM POTENTIAL RECEIVERSHIP ENTITY (.8); OUTLINE DEMAND AND COMPLAINT AGAINST [REDACTED] AND RELATED RESEARCH (1.2)	3.40	
11/02/23	MJN	REVIEW DEMAND AND MEMORANDUM REGARDING FRAUDULENT TRANSFERS	0.50	
11/02/23	MJN	CORRESPOND WITH COUNSEL FOR TRANSAMERICA REGARDING SUBPOENA;	0.30	
11/02/23	MJN	CORRESPOND WITH COUNSEL FOR TRANSAMERICA	0.30	

F E E S

Date	Attorney	Description	Hours	
		REGARDING SUBPOENA; REVIEW SUBPOENA.		
11/02/23	WOD	ANALYZE MEMORANDUM OF LAW ON CLAIMS AGAINST [REDACTED]	0.50	
11/02/23	PH	DRAFT CIVIL THEFT DEMAND LETTER	2.00	
11/03/23	BGR	WORK ON DEMAND LETTERS AND LITIGATION STRATEGY	2.40	
11/03/23	KLB	REVISE AND FINALIZE SUBPOENA TO S. HOLTZ, E. HOLTZ LIVING TRUST AND A. HOLTZ AND EMAILS TO AND FROM G. GAUKROGER REGARDING ISSUANCE OF SAME	0.40	
11/03/23	KLB	INITIAL PREPARATION OF CHART OF RECENTLY FILED ACTIONS COMMENCED BY RECEIVER	0.80	
11/03/23	WOD	RECEIPT AND REVIEW OF DRAFT CIVIL THEFT DEMAND TO [REDACTED]	0.30	
11/03/23	PH	FINALIZE DRAFT CIVIL THEFT DEMAND [.2 NO CHARGE]	0.00	N/C
11/03/23	PH	DRAFT COMPLAINT AGAINST [REDACTED]	0.70	
11/04/23	PH	DRAFT COMPLAINT AGAINST [REDACTED]	2.60	
11/05/23	GCG	REVISE AND WORK ON DRAFT CIVIL THEFT DEMAND AND RELATED CLIENT EMAILS	0.60	
11/06/23	PH	DRAFT COMPLAINT FOR [REDACTED]	1.60	
11/07/23	BGR	ATTEND TEAMS CALL ON CLAIMS RECONCILIATION	0.50	
11/07/23	BGR	ATTEND CALL ON GRACE HOLDING AND EXPANSION OF RECEIVERSHIP. [.5 NO CHARGE]	0.00	N/C
11/07/23	BGR	PREPARE FOR AND ATTEND CALL ON LITIGATION TARGET ANALYSIS	0.90	
11/07/23	BGR	WORK ON DEMAND LETTER ANALYSIS	1.20	
11/07/23	BGR	WORK ON ANALYSIS OF DEMAND LETTERS	0.90	
11/07/23	MJN	RESEARCH REGARDING 5TH AVENUE PHYSICIANS/REVIEW DOCUMENTS.	0.50	
11/07/23	MJN	PREPARE ADMINISTRATIVE CLAIM FOR MCM LANDLORD.	1.20	
11/07/23	MJN	REVIEW CORRESPONDENCE FROM KATCHIS COUNSEL; CORRESPOND WITH TEAM REGARDING THE SAME.	0.30	
11/07/23	PH	DRAFT COMPLAINT AGAINST [REDACTED] [1.8 NO CHARGE]	0.00	N/C

F E E S

Date	Attorney	Description	Hours
11/08/23	BGR	PREPARE FOR AND ATTEND TEAM CALL ON LITIGATION STRATEGY ISSUES	1.50
11/08/23	BGR	ATTEND TO █████ ISSUES ON DOCUMENTS/CONFIDENTIALITY ORDER	0.60
11/08/23	BGR	REVIEW AND UPDATE █████ ISSUE	0.40
11/08/23	BGR	WORK ON GRACE MOTION TO EXPAND RECEIVERSHIP	0.40
11/08/23	KLB	EMAILS AND DISCUSSIONS WITH M. NILES REGARDING COMMUNICATIONS FROM COUNSEL TO KATCHIS FAMILY IN RESPONSE TO FRAUDULENT TRANSFER DEMAND LETTERS	0.20
11/08/23	GCG	PARTICIPATE IN TEAMS CALL WITH PAT O'MALLEY (PARTIAL), TAYLOR CARUSO, GABRIA BRENNER, BRIAN RICH, DAN STERMER, AND MICHAEL NILES (PARTIAL) REGARDING RECOVERY RELATED ISSUES/STATUS, CLAIMS RELATED ISSUES/STATUS, AND OVERALL RECEIVERSHIP RELATED ISSUES AND NEXT STEPS	1.20
11/08/23	MJN	CORRESPOND WITH D. STERMER REGARDING LANDLORD ADMINISTRATIVE MOTION; FOLLOW UP WITH H.KOROGLU REGARDING THE SAME.	0.20
11/08/23	MJN	REVIEW COMMENTS/REVISIONS TO ADMIN CLAIM MOTION PROVIDED BY LANDLORD'S COUNSEL; CORRESPOND WITH TEAM REGARDING THE SAME.	0.20
11/08/23	MJN	PARTICIPATE IN TEAMS CALL WITH PAT O'MALLEY (PARTIAL), TAYLOR CARUSO, GABRIA BRENNER, BRIAN RICH, GAVIN GAUKROGER, AND DAN STERMER REGARDING RECOVERY RELATED ISSUES/STATUS, CLAIMS RELATED ISSUES/STATUS, AND OVERALL RECEIVERSHIP RELATED ISSUES AND NEXT STEPS.	1.00
11/08/23	MJN	PREPARE AND REVISE LETTER TO FIFTH AVENUE; FOLLOW UP WITH G. GAUKROGER.	0.40
11/08/23	MJN	REVIEW AND REVISE SUBPOENA TO SHUTTS AND BOWEN; FOLLOW UP WITH KOROGLU AND T CARUSO REGARDING THE SAME.	0.40
11/08/23	MJN	REVIEW RESPONSE FROM R.SCHINDLER REGARDING █████ CORRESPOND WITH TEAM REGARDING THE SAME.	0.30
11/08/23	WOD	RECEIPT AND REVIEW OF CORRESPONDENCE FROM KATCHIS ATTORNEY IN RESPONSE TO DEMAND LETTER AND CLIENT ANALYSIS.	0.30
11/08/23	WOD	RECEIPT AND REVIEW OF █████ LETTER RESPONSE AND EXCHANGE CORRESPONDENCES	0.50

F E E S

Date	Attorney	Description	Hours
		WITH CLIENT RE: SAME.	
11/08/23	PH	DRAFT COMPLAINT AGAINST [REDACTED]	0.20
11/09/23	BGR	REVIEW ANALYSIS AND RESPONSES TO AND FROM ROSE SCHINDLER	0.90
11/09/23	KLB	TELEPHONE CONFERENCE WITH M. NILES REGARDING RESPONSE TO DEMAND LETTER BY COUNSEL FOR KATCHIS FAMILY MEMBERS, AND UPDATE CHART REGARDING SAME	0.30
11/09/23	KLB	EMAILS TO PROCESS SERVER REGARDING SERVICE ON DEFENDANTS AND STATUS OF SAME	0.20
11/09/23	KLB	REVISE SUBPOENA TO SHUTTS & BOWEN AND PREPARE NOTICE OF INTENT TO ISSUE SAME; EMAILS TO AND FROM M. NILES AND REVISE SUBPOENA	0.60
11/09/23	KLB	INITIAL RESEARCH TO LOCATE BETTER ADDRESSES FOR CERTAIN DEFENDANTS FOR SERVICE OF SUMMONSES AND COMPLAINTS	0.40
11/09/23	GCG	DRAFT CONFIDENTIALITY AGREEMENT RE HOLTZ SUBPOENAS (1.2); RELATED CLIENT EMAILS (.1); ANALYZED ACTION ITEMS AND WORK FLOWS EMAILS (.2); ANALYZE ISSUES REGARDING DEMAND LETTERS AND REVISIONS (.2)	1.70
11/09/23	MJN	REVIEW RESPONSE FROM R. SCHINDLER REGARDING R. DUNOFF; FOLLOW UP WITH TEAM REGARDING THE SAME.	0.30
11/09/23	MJN	FOLLOW UP WITH T. CARUSO AND D. STEMER REGARDING DEMAND LETTER TO 5TH AVENUE. RESEARCH REGARDING MAILING ADDRESS.	0.40
11/09/23	MJN	REVIEW AND PROVIDE COMMENT TO RESPONSE FOR J. PALUZZI	0.60
11/09/23	MJN	REVIEW CORRESPONDENCE AND DOCUMENTS PROVIDED BY T.CARUSO REGARDING DEMANDS.	0.60
11/09/23	MJN	PREPARE RESPONSE TO MS. SCHINDLER; CORRESPOND WITH TEAM REGARDING THE SAME.	0.40
11/09/23	MJN	REVIEW CORRESPONDENCE FROM FRAUDULENT TRANSFER DEMAND. CORRESPOND WITH TEAM REGARDING THE SAME.	0.40
11/09/23	WOD	RECEIPT AND REVIEW OF LETTER RESPONSE FROM DONOFF.	0.20
11/09/23	WOD	ANALYZE DRAFT COMPLAINT AGAINST [REDACTED] REVISE, AND DISCUSS WITH P. HICKS.	2.00
11/09/23	WOD	RECEIPT AND REVIEW OF LETTER RESPONSE FROM	0.30

F E E S

Date	Attorney	Description	Hours	
		PALUZZI		
11/09/23	WOD	RECEIPT AND REVIEW OF LETTER RESPONSE FROM ██████████	0.30	
11/09/23	WOD	RECEIPT AND REVIEW OF EXTENSIVE CORRESPONDENCES FROM CLIENT RE: ADVISOR SALE OF PROMISSORY NOTES; EXCHANGE CORRESPONDENCES WITH LITIGATION TEAM RE: MEDIATION.	1.00	
11/09/23	PH	DRAFT AND REVISE COMPLAINT, INCLUDING AFTER CONFERRING WITH WILLIAM DIAB	3.00	
11/10/23	BGR	REVIEW AND COMMENT ON G. WOODFIELD CONFIDENTIALITY AGREEMENT	0.40	
11/10/23	BGR	REVIEW AND ANALYSIS OF PENDING LITIGATION CLAIMS AND ATTEND TO POSSIBLE PRE-SUIT MEDIATIONS	1.90	
11/10/23	KLB	CONDUCT RESEARCH REGARDING BETTER ADDRESSES FOR THREE DEFENDANTS (.7); PREPARE THREE ALIAS SUMMONSES AND EMAILS TO M. NILES (.4); FINALIZE, FORMAT AND SUBMIT ALIAS SUMMONSES FOR ISSUANCE (.4)	1.50	
11/10/23	KLB	PREPARE MOTION FOR APPOINTMENT OF PROCESS SERVER AND PROPOSED ORDER GRANTING SAME (.6); EMAILS TO AND FROM B. RICH AND M. NILES (.2)	0.80	
11/10/23	KLB	REVISE AND FINALIZE MOTION TO APPOINT PROCESS SERVER AND DISCUSSIONS WITH M. NILES (.3); FORMAT AND E-FILE MOTION TO APPOINT PROCESS SERVER AND REVISE, FINALIZE, FORMAT AND SUBMIT PROPOSED ORDER (.3)	0.60	
11/10/23	GCG	NEGOTIATE CONFIDENTIALITY AGREEMENT WITH HOLTZ ESTATE COUNSEL AND RELATED CLIENT EMAILS (1); FOLLOW UP AND REVIEW ADDITIONAL SUPPORT FOR CLAIMS FROM D. STERMER (.2)	1.20	
11/10/23	MJN	WORK ON TASK LIST FOR OUTSTANDING ITEMS TO DISCUSS WITH TEAM.	1.20	
11/10/23	MJN	REVIEW REVISED CONFIDENTIALITY AGREEMENT; FOLLOW UP WITH TEAM REGARDING THE SAME.	0.20	
11/10/23	MJN	CORRESPOND WITH MS. SCHINDLER ON DEMANDS	0.20	
11/10/23	MJN	CORRESPOND WITH MR. ZUCKERBROD REGARDING RESPONSE TO DEMAND.	0.20	
11/10/23	MJN	REVIEW ALIAS SUMMONSES FOR CERTAIN DEFENDANTS [.3 NO CHARGE]	0.00	N/C

F E E S

Date	Attorney	Description	Hours	
11/10/23	PH	DRAFT COMPLAINT AGAINST [REDACTED]	0.50	
11/11/23	WOD	EXCHANGE CORRESPONDENCE WITH P. HICKS RE: STRATEGY FOR CAUSES OF ACTION AGAINST [REDACTED] [REDACTED] [.3 NO CHARGE]	0.00	N/C
11/11/23	PH	FINALIZE DRAFT COMPLAINT FOR [REDACTED] AND INCORPORATE WILLIAM DIAB COMMENTS	1.10	
11/12/23	PH	FINAL REVIEW OF [REDACTED] COMPLAINT PRIOR TO SENDING TO GAVIN GAUKROGER [.3 NO CHARGE]	0.00	N/C
11/13/23	BGR	WORK ON ANALYSIS OF NET WINNERS	1.20	
11/13/23	BGR	ANALYSIS OF CONFIDENTIALITY AGREEMENTS AND [REDACTED] ISSUES	0.90	
11/13/23	KLB	REVIEW EMAIL REGARDING ENTRY OF ORDER APPOINTING PROCESS SERVER, AND EMAILS TO AND FROM PROCESS SERVER REGARDING SAME AND STATUS OF ISSUANCE OF ALIAS SUMMONSES	0.20	
11/13/23	KLB	REVIEW AND RESPOND TO EMAILS FROM MEDIATOR REGARDING STATUS OF SERVICE OF PROCESS UPON FIVE DEFENDANTS	0.30	
11/14/23	BGR	WORK ON DAFT COMPLAINTS	1.90	
11/14/23	KLB	REVIEW EMAIL REGARDING MOTION TO EXPAND RECEIVERSHIP TO INCLUDE GRACE HOLDINGS (.1); EMAILS TO B. RICH REGARDING DECLARATION IN SUPPORT OF SAME AND PREPARE COVER LETTER TO JUDGE HARPER (.8)	0.90	
11/14/23	KLB	EMAILS TO COUNSEL REGARDING HEARING AVAILABILITY AND PREPARE FOR SERVICE OF MOTION TO EXPAND RECEIVERSHIP	0.50	
11/14/23	MJN	REVIEW MOTION AND ORDER REGARDING GRACE HOLDINGS; FOLLOW UP WITH K. BURNS REGARDING THE SAME.	0.40	
11/14/23	MJN	REVIEW PROPOSED LETTER TO JUDGE REGARDING MOTION TO EXPAND RECEIVERSHIP. [.2 NO CHARGE]	0.00	N/C
11/15/23	BGR	WORK ON DRAFT COMPLAINT ISSUES ON CLAW BACK CLAIMS	0.90	
11/15/23	KLB	REVIEW INFORMATION RECEIVED FROM PROCESS SERVER REGARDING NON-SERVICE UPON J. SUSSMAN (.1); CONDUCT RESEARCH TO LOCATE BETTER ADDRESS FOR DEFENDANT AND PREPARE ALIAS SUMMONS (.5); REVISE, FINALIZE, FORMAT AND SUBMIT ALIAS SUMMONS FOR ISSUANCE (.2)	0.80	

F E E S

<u>Date</u>	<u>Attorney</u>	<u>Description</u>	<u>Hours</u>	
11/15/23	KLB	UPDATE AVOIDANCE ACTION CHART TO REFLECT CURRENT STATUS OF FRAUDULENT TRANSFER ACTIONS AND EMAILS TO AND FROM PROCESS SERVER REGARDING STATUS OF ISSUANCE OF ALIAS SUMMONSES	0.20	
11/15/23	KLB	EMAILS TO AND FROM D. STERMER REGARDING HEARING ON MOTION TO EXPAND RECEIVERSHIP AND PREPARE NOTICE OF HEARING REGARDING SAME (.3); FINALIZE, FORMAT AND E-FILE HEARING NOTICE AND PREPARE FOR SERVICE (.2); SUBMIT FILED HEARING NOTICE TO ON-LINE SCHEDULING PORTAL (.1)	0.60	
11/15/23	KLB	DISCUSSIONS WITH M. NILES REGARDING STATUS OF MOTION TO APPROVE ADMINISTRATIVE CLAIM WITH LANDLORD AND UPDATE MASTER WORK IN PROCESS LIST [.2 NO CHARGE]	0.00	N/C
11/15/23	MJN	CORRESPOND WITH H. KOROGLU REGARDING ADMIN MOTION; FINALIZE ADMINISTRATIVE EXPENSE CLAIM MOTION.	0.30	
11/15/23	MJN	REVIEW AND UPDATE TASK LIST; FOLLOW UP WITH K.BURNS. [.4 NO CHARGE]	0.00	N/C
11/16/23	GCG	COMMUNICATIONS WITH G. WOODFIELD REGARDING CONFIDENTIALITY AGREEMENT AND SUBPOENAS	0.20	
11/16/23	MJN	FINALIZE LANDLORD MOTION AND SUBPOENA FOR FILING.	0.30	
11/17/23	BGR	LITIGATION CLAIM ANALYSIS	2.20	
11/17/23	MJN	REVIEW FILED MOTION AND SUBPOENA AND FOLLOW UP WITH TEAM REGARDING THE SAME.	0.20	
11/17/23	MJN	CORRESPOND WITH BERGER SINGERMAN TEAM REGARDING ALIAS SUMMONS ISSUES.	0.30	
11/17/23	WOD	DISCUSS STRATEGY FOR DOCUMENT REVIEW AND EVIDENCE COLLECTION AGAINST ADVISORS WITH P. HICKS.	1.00	
11/17/23	PH	REVIEW DISCOVERY WITH WILLIAM DIAB CONCERNING EVIDENCE OF ADVISOR'S SALE OF UNLICENSED SECURITIES THROUGH PARA	0.50	
11/18/23	BGR	WORK ON CLAIM DISTRIBUTION MOTION; RESEARCH ISSUES AND WORK ON CLAIM ANALYSIS REGARDING RISING TIDE.	2.10	
11/20/23	BGR	DARFT MOTION TO COMMENCE CLAIM PROCESS	2.60	
11/20/23	GCG	FOLLOW UP REGARDING CLIENT INQUIRIES RE PELICAN ISSUES	0.20	

F E E S

<u>Date</u>	<u>Attorney</u>	<u>Description</u>	<u>Hours</u>
11/20/23	WOD	REVIEW DOCUMENTS TO COLLECT EVIDENCE OF ADVISORS SELLING PROMISSORY NOTES.	2.00
11/20/23	PH	REVIEW AND ANALYZE DISCOVERY FOR DOCUMENTS TO LINK ADVISORS TO PARA ENTITIES	3.40
11/21/23	BGR	WORK ON ISSUES RELATED TO BANK RECORDS	0.90
11/21/23	MJN	PREPARE FOR AND ATTEND CONFERENCE CALL WITH COUNSEL FOR DEMAND LETTERS.	0.50
11/21/23	MJN	CONFERENCE WITH T. CARUSO REGARDING DEMAND LETTERS.	0.40
11/21/23	MJN	PREPARE CONFIDENTIALITY AGREEMENT.	0.50
11/21/23	MJN	CORRESPOND WITH T. ZUCKERBROD REGARDING MEDIATION.	0.20
11/21/23	MJN	FOLLOW UP WITH COUNSEL FOR SOBEL HOA REGARDING TRANSCRIPT; FOLLOW UP WITH TEAM REGARDING DRAFT SOBEL AGREEMENT.	0.40
11/21/23	PH	COMPILE DISCOVERY AGAINST ADVISORS	3.00
11/22/23	BGR	FOLLOW-UP ON REQUEST TO OFR ON SUBPEONA FOR BANK RECORDS	0.60
11/22/23	BGR	WORK ON UPDATED TASK LIST	0.90
11/22/23	BGR	WORK ON DRAFT ON LITIGATION CLAIMS ANALYSIS OF SAME	0.90
11/22/23	GCG	WORK ON DRAFT SUBPOENA TO OFR AND REVIEW AND SUMMARIZE RELATED CLIENT INFORMATION FOR SAME (.7); DRAFT NOTICE OF INTENT TO SERVE SUBPOENA (.3); CLIENT EMAILS REGARDING SAME (.2)	1.20
11/22/23	MJN	PREPARE SUBPOENA AND NOTICE OF FILING TO OFR; CORRESPOND WITH TEAM REGARDING THE SAME.	0.60
11/24/23	BGR	WORK ON WIP MEMO	0.90
11/24/23	BGR	PREPARE FOR UPCOMING HEARINGS	0.80
11/25/23	BGR	LITIGATION ANALYSIS WORK	0.90
11/27/23	BGR	PREPARE FOR HEARING ON GRACE HOLDING ISSUES	0.50
11/27/23	BGR	WORK ON CLAIM PROCESS MOTION DRAFT DRAFT	0.90
11/27/23	KLB	GATHER PLEADINGS FOR NOVEMBER 28, 2023 HEARING ON MOTION TO EXPAND RECEIVERSHIP TO INCLUDE GRACE HOLDINGS AND PREPARE E-BINDER FOR SAME	0.70
11/27/23	KLB	FINALIZE, FORMAT AND SUBMIT PROPOSED ORDER GRANTING MOTION TO EXPAND RECEIVERSHIP TO	0.20

F E E S

Date	Attorney	Description	Hours	
		INCLUDE GRACE HOLDINGS; EMAILS TO AND FROM B. RICH REGARDING SAME		
11/27/23	KLB	REVIEW DOCKETS OF ACTIONS FILED AND SUBMIT ALIAS SUMMONS TO BE ISSUED BY CLERK FOR SERVICE UPON A. DICEMBRINO (.3)); EMAILS TO AND FROM PROCESS SERVER REGARDING FILING OF RETURNS OF NON-SERVICE (.2); DISCUSSIONS WITH M. NILES REGARDING STATUS AND UPDATE STATUS CHART (.2)	0.70	
11/27/23	KLB	REVISE NOTICE OF INTENT TO ISSUE SUBPOENA UPON OFFICE OF FINANCIAL REGULATION (.1); FINALIZE NOTICE AND REVISE SUBPOENA (.3); FORMAT AND E-FILE NOTICE OF INTENT TO ISSUE SUBPOENA (.2)	0.60	
11/27/23	GCG	FOLLOW UP WITH COUNSEL FOR PELICAN (.1); FOLLOW UP REGARDING SUBPOENA TO OFR (.1); FURTHER EMAILS REGARDING CONFIDENTIALITY AGREEMENT (.2); RELATED CLIENT EMAILS (.1)	0.50	
11/27/23	MJN	CORRESPOND WITH COUNSEL REGARDING CONFIDENTIALITY AGREEMENT.	0.30	
11/27/23	MJN	FINALIZE OFR SUBPOENA; CORRESPOND WITH TEAM REGARDING THE SAME.	0.30	
11/28/23	BGR	CALL WITH DSI TEAM ON CLAIM RECONCILIATION MODEL EXCEL.	0.60	
11/28/23	BGR	WORK ON CLAIM PROCESS MOTION DRAFT	1.60	
11/28/23	BGR	PREPARE FOR AND ATTEND HEARING ON MOTION TO EXPAND RECEIVERSHIP.	0.90	
11/28/23	GCG	EMAILS TO/FROM COUNSEL FOR PELICAN (.1); ATTENTION TO COURT ORDER REGARDING EXPANSION OF RECEIVERSHIP (.1)	0.20	
11/28/23	MJN	REVIEW CORRESPONDENCE FROM R. SCHINDLER; FOLLOW UP WITH CLIENT REGARDING THE SAME.	0.20	
11/28/23	WOD	DISCUSS EVIDENCE COLLECTED BY P. HICKS ON ADVISORS. [.5 NO CHARGE]	0.00	N/C
11/28/23	PH	REVIEW DISCOVERY FOR ADVISORS CONCERNING EVIDENCE OF COMMISSIONS AND SALE OF PARA DURING STATUTORY TIMEFRAME	4.90	
11/29/23	BGR	WORK ON CLAIM MOTION DRAFT AND REVISIONS; ANALYSIS OF RISING TIDE; REVIEW SPREADSHEET OF CLAIMS	2.20	
11/29/23	KLB	FORMAT AND SUBMIT ALIAS SUMMONSES FOR ISSUANCE BY CLERK UPON J. SUSSMAN AND D.	0.50	

F E E S

Date	Attorney	Description	Hours	
		TEPPER AND EMAILS TO AND FROM PROCESS SERVER REGARDING SERVICE OF ALIAS SUMMONS UPON A. DICEMBRINO		
11/29/23	GCG	FOLLOW UP WITH A. RUTTENBERG REGARDING PELICAN DEMAND (.1); CLIENT UPDATE EMAILS (NC); FOLLOW UP WITH G. WOODFIELD REGARDING SUBPOENAS TO HOLTZ PARTIES (.1); CLIENT UPDATE (NC)	0.00	N/C
11/29/23	MJN	CORRESPOND WITH TRANSAMERICA REGARDING CONFIDENTIALITY AGREEMENT; FOLLOW UP WITH COUNSEL CONCERNS.	0.30	
11/29/23	MJN	REVIEW ALIAS SUMMONS; CORRESPOND WITH K.BURNS REGARDING THE SAME.	0.40	
11/29/23	PH	REVIEW DISCOVERY FOR EVIDENCE OF DEALING IN PARA FUNDS BY ADVISORS	4.00	
11/30/23	BGR	WORK ON CLAIM MOTION AND CALL WITH CLIENT ON SAME	0.90	
11/30/23	GCG	CLIENT STRATEGY CONFERENCE (.4); PREPARE FOR AND CONDUCT MEET AND CONFER WITH COUNSEL FOR PELICAN (.8); ATTENTION TO CORRESPONDENCE WITH COUNSEL FOR SEEMAN AND COUNSEL FOR OFR (.2); CLIENT UPDATE EMAIL (.1)	1.50	
11/30/23	MJN	CORRESPOND WITH R. SCHINDLER REGARDING MEDIATION; REVIEW PRIOR CORRESPONDENCE AND PROCEDURES MOTION.	0.40	
12/01/23	BGR	ATTEND TO ██████████ SUSSMAN MEDIATION PREPARATION ISSUES	0.90	
12/01/23	BGR	WORK ON CLAIMS UPDATE MOTION/ISSUES	1.60	
12/04/23	BGR	PREPARE FOR AND ATTEND CALL ON CLAIM PROCESS MOTION	0.80	
12/04/23	KLB	EMAILS TO PROCESS SERVER WITH ALIAS SUMMONSES TO BE SERVED UPON D. TEPPER AND J. SUSSMAN (.2); UPDATE CHART OF AVOIDANCE ACTIONS AND EMAILS TO AND FROM PROCESS SERVER REGARDING SERVICE UPON J. ABRAMSON (.2)	0.40	
12/04/23	KLB	EMAILS REGARDING STATUS OF SERVICE OF COMPLAINT AND SUMMONS UPON A. DICEMBRINO	0.10	
12/04/23	MJN	CORRESPOND WITH COUNSEL FOR DEMAND LETTERS; FOLLOW UP REGARDING MEDIATION.	0.40	
12/05/23	BGR	WORK ON LITIGATION CLAIMS - ANALYSIS AND REVIEW TARGETS	1.60	

F E E S

<u>Date</u>	<u>Attorney</u>	<u>Description</u>	<u>Hours</u>	
12/05/23	BGR	WORK ON DISCOVERY ISSUES - IN PENDING MATTERS	0.80	
12/05/23	GCG	EMAILS TO/FROM COUNSEL FOR HOLTZ PARTIES REGARDING RESPONSES TO SUBPOENA AND DOCUMENT PRODUCTIONS (.2); CLIENT STATUS UPDATE (.1); REVIEW AND ANALYZE ANALYSIS FROM DSI (.2); ANALYZE PENDING ISSUES FOR PRIORITY (.2)	0.70	
12/06/23	BGR	PREPARE FOR AND ATTEND CLIENT MEETING ON CLAIMS MOTION ISSUES	0.70	
12/06/23	KLB	MULTIPLE EMAILS FROM AND TO E. BECKWITH AND R. KOBERT REGARDING STATUS OF SERVICE OF PROCESS UPON VARIOUS DEFENDANTS AND SCHEDULING OF MEDIATIONS; SUBMIT ALIAS SUMMONS TO BE ISSUED BY CLERK FOR SERVICE UPON J. ABRAMSON	0.60	
12/06/23	GCG	FOLLOW UP ON DOCUMENT PRODUCTIONS FROM SUBPOENAED PARTIES (.1); CLIENT STRATEGY CONFERENCE (.3)	0.40	
12/06/23	MJN	CORRESPOND WITH COUNSEL REGARDING ADDITIONAL DUE DILIGENCE DOCUMENTATION REGARDING PREFERENCE DEMAND.	0.30	
12/06/23	MJN	CORRESPOND WITH H. KOROGLU REGARDING SUBPOENA.	0.30	
12/06/23	MJN	CORRESPOND WITH ADDITIONAL COUNSEL REGARDING DEMAND LETTERS. [.3 NO CHARGE]	0.00	N/C
12/07/23	BGR	WORK ON LITIGATION CLAIM ISSUES	0.90	
12/08/23	BGR	WORK ON REQUEST FOR BS BANK RECORDS	0.40	
12/08/23	KLB	FINALIZE SUBPOENA DIRECTED TO STATE OF FLORIDA OFFICE OF FINANCIAL REGULATION AND EMAILS TO AND FROM G. GAUKROGER REGARDING SAME (.2); PREPARE FOR SERVICE OF SUBPOENA UPON COUNSEL FOR OFFICE OF FINANCIAL REGULATION (.2)	0.40	
12/08/23	MJN	REVIEW ALIAS SUMMONS AND RELATED FILINGS.	0.40	
12/11/23	KLB	RESEARCH REGARDING ADDRESS OF J. SUSSMAN FOR SERVICE OF COMPLAINT AND REVIEW EMAIL FROM PROCESS SERVER REGARDING STATUS OF SERVICE OF PROCESS	0.40	
12/11/23	KLB	EMAILS FROM REPRESENTATIVE OF RESOLUTION LIFE REGARDING SUBPOENA AND DOCUMENT REQUESTS; EMAILS TO B. RICH	0.20	
12/11/23	KLB	REVIEW ISSUED ALIAS SUMMONS UPON J. ABRAMSON AND EMAILS TO AND FROM PROESS	0.20	

F E E S

Date	Attorney	Description	Hours	
		SERVER REGARDING SERVICE OF PAPERS UPON DEFENDANT		
12/11/23	MJN	CORRESPOND WITH T. ZUCKERBROD REGARDING DEMAND AND MEDIATION.	0.40	
12/11/23	MJN	CORRESPOND WITH H.KOROGLU REGARDING PRODUCTION; REVIEW RESPONSE;	0.50	
12/11/23	MJN	CORRESPOND WITH R. SCHINDLER REGARDING MEDIATION; FOLLOW UP REGARDING THE SAME.	0.40	
12/12/23	BGR	ATTEND TO PRODUCTION ISSUES	0.90	
12/12/23	KLB	EMAILS REGARDING STATUS OF SERVICE OF PROCESS ON JASON SUSSMAN AND EMAILS TO AND FROM RECEIVER REGARDING SAME	0.20	
12/12/23	KLB	EMAILS REGARDING SERVICE ON D. TEPPER AND ACCEPTANCE OF SERVICE DOCUMENT FILED BY COUNSEL; UPDATE CHART REFLECTING STATUS OF SERVICE OF PROCESS AND REVIEW EMAIL FROM MEDIATOR REGARDING AVAILABILITY FOR MEDIATIONS IN JANUARY 2024	0.30	
12/12/23	MJN	FURTHER FOLLOW UP WITH R. SCHINDLER.	0.30	
12/12/23	MJN	CORRESPOND WITH T. GRANER REGARDING MEDIATIONS.	0.40	
12/12/23	MJN	CORRESPOND WITH W. DIAB REGARDING MEDIATIONS AND PREPARATION OF MEDIATION STATEMENTS.	0.30	
12/12/23	MJN	FOLLOW UP WITH H. KORUGLU REGARDING ACCESS TO DOCUMENTS.	0.20	
12/13/23	BGR	ATTEND TO ORTH REQUEST FOR DOCUMENTS	0.60	
12/13/23	KLB	TELEPHONE CONFERENCE WITH M. NILES REGARDING PRODUCTION OF DOCUMENTS BY SHUTTS & BOWEN AND DOWNLOAD AND ORGANIZE SAME [.6 NO CHARGE]	0.00	N/C
12/13/23	MJN	REVIEW SHUTTS PRODUCTION AND CORRESPOND WITH T. CARUSO AND D. STERMER REGARDING THE SAME.	0.60	
12/14/23	BGR	ATTEND TO UPCOMING MEDIATION PREPARATION ISSUES	0.50	
12/14/23	BGR	WORK ON DOCUMENTS FROM ORTH AND PREPARE FOR CALL WITH CARL SCHOEPPL	0.60	
12/14/23	MJN	FINALIZE DEMAND TO 5TH AVE PARTNERS FOR TRANSMITTAL; CORRESPOND WITH Z.MORTON REGARDING THE SAME.	0.30	

F E E S

<u>Date</u>	<u>Attorney</u>	<u>Description</u>	<u>Hours</u>	
12/14/23	MJN	PREPARE FOR MEETING WITH W. DIAB AND P. HICKS REGARDING MEDIATIONS; REVIEW COMPLAINTS AND DEMAND LETTERS; RESEARCH REGARDING THE SAME.	2.00	
12/14/23	MJN	CORRESPOND WITH OPPOSING COUNSEL AND MEDIATORS REGARDING MEDIATION; FOLLOW UP WITH D. STERMER AND B.RICH REGARDING THE SAME.	0.40	
12/14/23	WOD	STRATEGY MEETING TO DISCUSS MEDIATION STRATEGY WITH M. NILES AND P. HICKS.	0.60	
12/14/23	PH	STRATEGY MEETING WITH M. HINES AND W. DIAB AND ADDITIONAL DISCOVERY REVIEW OF ADVISORS.	1.40	
12/15/23	BGR	ATTEND TO MEDIATION SCHEDULE ISSUES [.4 NO CHARGE]	0.00	N/C
12/15/23	PH	CREATING SPREADSHEET COMPILING EVIDENCE AGAINST ADVISORS	3.20	
12/18/23	BGR	PREPARE FOR TEAM CALL ON DECEMBER 19, 2023	0.90	
12/18/23	GCG	ATTENTION TO MEDIA INQUIRY FROM SUN SENTINEL AND PROPOSE RESPONSE TO SAME (.2)	0.20	
12/19/23	BGR	PREPARE FOR AND ATTEND CALL WITH VERNON	0.80	
12/19/23	BGR	PREPARE FOR AND ATTEND CALL WITH PELICAN ON DEMAND LETTER	0.60	
12/19/23	BGR	PREPARE FOR AND ATTEND TEAM CALL	0.80	
12/19/23	GCG	PREPARE FOR AND HOST MEET AND CONFER WITH PELICAN CAPITAL COUNSEL WITH B. RICH	0.50	
12/19/23	GCG	ATTEND CLIENT STRATEGY CONFERENCE [.6 NO CHARGE]	0.00	N/C
12/19/23	CMG	CREATION OF SHAREFILE REPOSITORY AND UPLOAD LINK FOR INCOMING DOCUMENT PRODUCTIONS [.1 NO CHARGE]	0.00	N/C
12/20/23	BGR	ATTEND TO DEMAND LETTER REPSONSE ISSUES	0.80	
12/20/23	BGR	WORK ON CLAIM PROCESS MOTION	0.90	
12/20/23	GCG	RESEARCH DOCKET AND ADVISE CLIENT REGARDING LUCENKO APPEAL ISSUES (.5); ANALYZE BANK RECORDS RE PELICAN ISSUES AND RELATED EMAILS WITH DSI TEAM (.6)	1.10	
12/21/23	BGR	ANALYZE KATCHIS ISSUES FOR RESPONSE AND DEMAND	0.90	
12/21/23	BGR	ATTEND TO MEDIATION PREPARATION ISSUES	0.80	

F E E S

Date	Attorney	Description	Hours	
12/21/23	GCG	DRAFT MOTION REGARDING TAX ISSUES (2.4) AND RELATED CONFERENCE CALL WITH D. STERMER (.2)	2.60	
12/21/23	MJN	CORRESPOND WITH COUNSEL AND MEDIATORS REGARDING SCHEDULING OF MEDIATIONS.	0.60	
12/21/23	MJN	CORRESPOND WITH COUNSEL FOR KATCHIS FAMILY ON DEMAND	0.60	
12/22/23	BGR	REVIEW TAX MOTION/EDIT SAME	0.90	
12/22/23	BGR	ATTEND TO DEMAND LETTER RESPONSE ISSUES	0.40	
12/22/23	GCG	WORK ON TAX MOTION AND REVIEW/ANALYZE COMMENTS FROM D. STERMER AND M. NILES, AND DRAFT FURTHER REVISIONS TO SAME	1.30	
12/22/23	GCG	ATTENTION TO PRODUCTION OF DOCUMENTS FROM HOLTZ PARTIES	0.20	
12/22/23	MJN	REVIEW MOTION FOR RELIEF FROM TAX OBLIGATIONS; RESEARCH REGARDING IRS/FDOR.	0.60	
12/22/23	MJN	CORRESPOND WITH C. MILLER (RE: FIFTH AVENUE PHYSICIAN SERVICES)	0.30	
12/26/23	BGR	CALL WITH S. ORTH AND C. SCHOEPPPL AND CLIENT AND FOLLOW-UP ON SAME	1.30	
12/26/23	BGR	WORK ON DISTRIBUTION MOTION	0.90	
12/27/23	BGR	ATTEND TO MEDIATION RELATED PREPARATION WORK	0.90	
12/27/23	BGR	ATTEND TO [REDACTED] ISSUES	0.80	
12/27/23	KLB	REVIEW EMAIL REGARDING SERVICE OF PROCESS UPON J. SUSSMAN AND EMAILS TO AND FROM D. STERMER REGARDING SAME; UPDATE CHART OF AVOIDANCE ACTIONS AND EMAILS TO AND FROM PROPOSED MEDIATOR REGARDING STATUS OF SERVICE OF PROCESS	0.30	
12/27/23	KLB	PREPARE PLURIES SUMMONS FOR ISSUANCE UPON J. ABRAMSON AND EMAILS AND DISCUSSIONS WITH M. NILES REGARDING SAME	0.60	
12/27/23	MJN	REVIEW DOCUMENTS REGARDING SUSSMAN.	0.80	
12/27/23	MJN	RESEARCH REGARDING J. ABRAMSON FOR SERVICE. [.5 NO CHARGE]	0.00	N/C
12/28/23	BGR	WORK ON TAX MOTION/CLAIM MOTION ISSUES	0.90	
12/28/23	KLB	REVIEW EMAILS FROM G. GAUKROGER AND REVISE MOTION FOR ORDER RELIEVING RECEIVER FROM	1.20	

F E E S

Date	Attorney	Description	Hours
		TAX OBLIGATIONS TO INCLUDE SERVICE LIST FOR TAXING AUTHORITIES(.6); FORMAT AND E-FILE MOTION AND PREPARE FOR SERVICE BY FIRST CLASS AND CERTIFIED MAIL (.4); REVIEW COURT'S ON-LINE SCHEDULING PORTAL FOR AVAILABLE HEARING DATES AND TELEPHONE CALL WITH G. GAUKROGER REGARDING SAME (.2)	
12/28/23	GCG	FINALIZE FOR FILING THE MOTION TO RELIEVE RECEIVER FROM TAX FILING OBLIGATIONS (.4); RELATED TELECONFERENCES AND EMAILS REGARDING SETTING HEARING FOR SAME (.2)	0.60
12/28/23	MJN	REVIEW SUSSMAN COMPLAINT AND OBJECTION FILED	0.50
12/28/23	MJN	CORRESPOND WITH T. ZUCKERBROD REGARDING MEDIATION; FOLLOW UP WITH MEDIATOR AND TEAM REGARDING THE SAME.	0.50
12/28/23	PH	UPDATE ADVISOR EMAIL SPREADSHEET	1.00
12/29/23	BGR	ATTEND TO SUSSMAN MEDIATION/RESPONSE ISSUES	0.90
12/29/23	MJN	REVIEW PLEADING FILED BY R. PEARCE. REVIEW PROCEDURES ORDER.	0.50
12/29/23	MJN	CORRESPOND WITH MEDIATOR AND PARTIES REGARDING MEDIATION.	0.40
12/29/23	PH	CREATING EVIDENTIARY SPREADSHEET RE ADVISOR EVIDENCE AND COMPILING DISCOVERY	3.00
01/02/24	BGR	PREPARE FOR AND ATTEND CALL WITH S. ORTH AND C. SCHOEPPL ON M. SEEMAN ISSUES	1.00
01/02/24	BGR	ATTEND TEAM CALL	0.80
01/02/24	GCG	PREPARE FOR CLIENT STATUS CONFERENCE AND ATTEND SAME (.6); WORK ON ANALYSIS OF FUNDS TRANSFERS RE PELICAN (.8)	1.40
01/02/24	MJN	PREPARE FOR AND PARTICIPATE IN MEETING WITH D. STERMER, B. RICH, G. GAUKROGER	1.00
01/03/24	BGR	WORK ON CLAIMS MOTION/NOTICE ISSUES	1.80
01/03/24	BGR	FOLLOW-UP ON ██████████/SUSSMAN MEDIATION ISSUES	0.90
01/03/24	KLB	DISCUSSIONS WITH M. NILES REGARDING STATUS OF SCHEDULING OF MEDIATIONS AND UPCOMING QUARTERLY STATUS REPORT (.2); REVIEW EMAILS REGARDING AVAILABILITY AND UPDATE STATUS CHART OF AVOIDANCE ACTIONS (.2)	0.40
01/03/24	KLB	REVISE DEMAND LETTER TO ██████████ AND EMAILS	0.30

F E E S

Date	Attorney	Description	Hours	
		TO M. NILES		
01/03/24	GCG	VOICEMAIL AND TELECONFERENCE WITH PALM BEACH COUNTY TAX COLLECTOR, JILL CRANE AND RELATED EMAIL FOLLOW UP	0.50	
01/03/24	GCG	MEDIATION STRATEGY (.2); FOLLOW UP EMAILS REGARDING MEDIATOR SELECTION AND TIMING FOR MEDIATION WITH SUSSMAN (.2)	0.40	
01/03/24	MJN	CORRESPOND WITH KEITH APPLEBY REGARDING MEDIATION.	0.30	
01/03/24	MJN	PICK UP DEATH CERTIFICATE FROM OFFICE OF VITAL STATISTICS.	1.00	
01/03/24	MJN	CORRESPOND WITH TEAM REGARDING MEDIATIONS; FOLLOW UP WITH W. DIAB REGARDING THE SAME.	1.00	
01/03/24	MJN	REVIEW AND REVISE DEMAND LETTER TO ██████████ ██████████CORRESPOND WITH COUNSEL REGARDING THE DEMAND.	0.50	
01/04/24	BGR	WORK ON CLAIMS MOTION/CALL WITH CLIENT	1.80	
01/04/24	KLB	FINALIZE AND SUBMIT PLURIES SUMMONS FOR ISSUANCE BY CLERK UPON J. ABRAMSON	0.20	
01/04/24	KLB	REVIEW AVAILABLE HEARING DATES REGARDING AGREED MOTION TO APPROVE ADMINISTRATIVE CLAIM OF MCM 301 YAMATO, LLC AND TELEPHONE CONFERENCE WITH M. NILES AND B. RICH REGARDING SAME (.2); PREPARE NOTICE OF HEARING AND FINALIZE, FORMAT AND E-FILE NOTICE OF HEARING (.3); SUBMIT FILED NOTICE OF HEARING THROUGH ON-LINE SCHEDULING PORTAL AND PREPARE FOR SERVICE (.1)	0.60	
01/04/24	KLB	EMAILS FROM AND TO G. GAUKROGER REGARDING SERVICE OF TAX MOTION AND HEARING NOTICE AND PREPARATION OF BINDER OF MATERIALS FOR UPCOMING HEARING	0.20	
01/04/24	MJN	CORRESPOND WITH TEAM REGARDING ██████████ MEDIATION; FOLLOW UP REGARDING THE SAME. [4 NO CHARGE]	0.00	N/C
01/04/24	MJN	REVIEW FILINGS RELATED TO J. ABRAMSON.	0.30	
01/04/24	MJN	PREPARE MEDIATION CHART AND OTHER DOCUMENTS IN PREPARATION OF MULTIPLE MEDIATIONS.	1.20	
01/04/24	MJN	CORRESPOND WITH T. ZUCKERBROD REGARDING MEDIATION.	0.30	

F E E S

<u>Date</u>	<u>Attorney</u>	<u>Description</u>	<u>Hours</u>	
01/04/24	PH	REVIEW ADDITIONAL [REDACTED] EVIDENCE IN PREPARATION FOR MEDIATION	3.10	
01/05/24	BGR	DISCUSSIONS ON MEDIATIONS	0.70	
01/05/24	MJN	PREPARE FOR MEDIATIONS; FOLLOW UP WITH MEDIATORS AND COUNSEL.	2.00	
01/05/24	MJN	PREPARE CORRESPONDENCE REGARDING SETTLEMENT WITH CERTAIN TARGETS.	0.60	
01/08/24	BGR	CALLS WITH BAXTER ON OMDCELL AND LUCENKO AND POSSIBLE SETTLEMENTS	0.90	
01/08/24	KLB	REVIEW EMAILS FROM G. GAUKROGER REGARDING HEARING MATERIALS AND E-BINDER OF SUPPORTING DOCUMENTS; PREPARE, FINALIZE, FORMAT AND E-FILE CERTIFICATE OF SERVICE REGARDING SERVICE OF MOTION AND HEARING NOTICE UPON TAXING AUTHORITIES	0.60	
01/08/24	KLB	GATHER DOCUMENTS AND PLEADINGS AND DOWNLOAD CASES; PREPARE E-BINDER OF SUPPORTING MATERIALS AND EMAILS TO AND FROM G. GAUKROGER REGARDING SAME	0.90	
01/08/24	KLB	REVISE PROPOSED ORDER ON MOTION TO RELIEVE RECEIVER FROM TAX OBLIGATIONS AND EMAILS FROM AND TO G. GAUKROGER	0.70	
01/08/24	KLB	FORMAT AND SUBMIT VARIOUS SUPPLEMENTAL DOCUMENTS TO ON-LINE SCHEDULING PORTAL FOR JANUARY 11, 2024, HEARING	0.60	
01/08/24	KLB	REVISE PROPOSED ORDER GRANTING MOTION FOR ADMINISTRATIVE EXPENSE CLAIM OF MCM 301 YAMATO	0.30	
01/08/24	GCG	WORK ON DRAFT PROPOSED ORDER AND VIEW OF HEARING MATERIALS FOR 1/11 HEARINGS	0.60	
01/08/24	MJN	REVISE ADMIN CLAIM ORDER FOR MCM LANDLORD; PREPARE FOR HEARING.	0.60	
01/09/24	BGR	CALLS WITH J. BAXTER AND S. ORTH ON TRIAL STATUS	0.90	
01/09/24	GCG	EMAILS RE MEDIATION WITH DICEMBRINO EMMETS AND TEPPER [.2 NO CHARGE]	0.00	N/C
01/09/24	MJN	CORRESPOND WITH PARTIES REGARDING MEDIATION; RESEARCH REGARDING THE SAME.	2.00	
01/10/24	BGR	PREPARE FOR HEARINGS	0.90	
01/10/24	BGR	MEDIATION PREPARATION ISSUES/WORK	0.90	

F E E S

Date	Attorney	Description	Hours	
01/10/24	KLB	EMAILS REGARDING SERVICE OF PLURIES SUMMONS ON J. ABRAMSON	0.20	
01/10/24	KLB	EMAILS REGARDING SUBMISSION OF PROPOSED ORDERS IN ADVANCE OF JANUARY 11, 2024, HEARING AND CIRCULATE DRAFTS OF PROPOSED ORDER ON MOTION TO RELIEVE RECEIVER FROM TAX OBLIGATIONS, AND PROPOSED ORDER GRANTING MOTION FOR ADMINISTRATIVE EXPENSE OF MCM 301 YAMATO	0.20	
01/10/24	KLB	GATHER PLEADINGS AND DOCUMENTS AND PREPARE E-BINDER FOR JANUARY 11, 2024, HEARING AND EMAILS TO TEAM	0.60	
01/10/24	KLB	REVISE AND FINALIZE PROPOSED ORDER GRANTING MOTION FOR ORDER RELIEVING RECEIVER FROM TAX OBLIGATIONS; REVISE AND FINALIZE PROPOSED ORDER GRANTING MOTION TO ALLOW ADMINISTRATIVE CLAIM OF MCM 301 YAMATO	0.40	
01/10/24	GCG	ANALYZE NOTICE OF SETTLEMENT RE OMDOLL (.1); REVIEW/FINALIZE PROPOSED ORDERS FOR 1/11 HEARINGS (.2); PREPARE FOR HEARINGS (.4); TELECONFERENCE WITH MEDIATOR RE HULING MEDIATION (.3)	1.00	
01/10/24	MJN	PREPARE FOR MEDIATIONS.	1.00	
01/10/24	MJN	CORRESPOND WITH R. KOBERT REGARDING MEDIATIONS; ATTEND ATTORNEY ONLY CALL FOR MEDIATION WITH ██████████ PREPARE FOLLOW UP FOR CLIENT.	1.20	
01/10/24	PH	UPDATING EVIDENCE SPREADSHEET AND ADDITIONAL DISCOVERY REVIEW RE ██████████	1.10	
01/11/24	BGR	ATTEND TO MEDIATION PREPARATION RELATED ISSUES	0.90	
01/11/24	BGR	MEDIATION STATEMENT/LOGISTICS ISSUES [.9 NO CHARGE]	0.00	N/C
01/11/24	KLB	EMAILS REGARDING COURT REPORTER FOR JANUARY 11, 2024, HEARING AND TELEPHONE CALLS AND EMAIL TO AND FROM COURT REPORTER FOR SAME	0.30	
01/11/24	GCG	PREPARE FOR AND ATTEND HEARING BEFORE J. HARPER ON RECEIVER'S MOTION FOR RELIEF FROM TAX FILING OBLIGATIONS, ETC. AND RELATED CLIENT EMAIL FOLLOW UPS	1.50	
01/11/24	MJN	PREPARE FOR AND PARTICIPATE IN HEARINGS ON TAX MOTION AND LANDLORD ADMIN CLAIM [1.0 NO	0.00	N/C

F E E S

Date	Attorney	Description	Hours	
		CHARGE]		
01/11/24	MJN	CORRESPOND WITH D. STERMER AND TEAM REGARDING ██████████ ATTORNEY CALL.	0.30	
01/11/24	MJN	REVIEW RETAINER AGREEMENT AND DOCUMENTS PROVIDED BY R. KOBERT.	0.40	
01/11/24	MJN	REVIEW CORRESPONDENCE FROM H.KOROGLU; FOLLOW UP WITH D. STERMER REGARDING THE SAME.	0.30	
01/11/24	MJN	CORRESPOND WITH B. PEARCE REGARDING MEDIATION AND FOLLOW UP WITH ██████████	0.30	
01/11/24	WOD	RECEIPT AND REVIEW OF NOTES FROM CALL WITH MEDIATOR AND DISCUSS MEDIATION STATEMENT STRATEGY WITH M NILES. [.2 NO CHARGE]	0.00	N/C
01/11/24	WOD	COMMENCE DRAFTING MEDIATION STATEMENT FOR ██████████ MEDIATION.	1.00	
01/11/24	PH	DISCUSS ██████████ EVIDENCE WITH WILLIAM DIAB	0.10	
01/12/24	BGR	ATTEND TO SUSSMAN MEDIATION RELATED ISSUES	0.90	
01/12/24	MJN	CORRESPOND WITH D. MAZANEC REGARDING THE KATCHIS OFFER; RESEARCH REGARDING THE SAME.	0.50	
01/12/24	WOD	EXCHANGE CORRESPONDENCE WITH TEAM REGARDING MEDIATION SCHEDULING OF ADVISORS IN MULTI-ANCILLARY LITIGATION. [.2 NO CHARGE]	0.00	N/C
01/13/24	MJN	REVIEW AND RESPOND TO CORRESPONDENCE FROM R. PEARCE.	0.20	
01/15/24	BGR	WORK ON MEDIATION AND ADVISOR CLAIM ANALYSIS	1.80	
01/15/24	MJN	REVIEW CORRESPONDENCE REGARDING MCM LANDLORD CLAIM.	0.30	
01/15/24	MJN	CORRESPOND WITH D. MAZANEC REGARDING MEETING.	0.30	
01/16/24	BGR	PREPARE FOR AND ATTEND TEAM CALL	0.80	
01/16/24	BGR	MEDIATION PREPARATION ISSUES	0.90	
01/16/24	BGR	FOLLOW-UP WITH OFR ON DRAFT JUDGMENT LANGAUGE	0.60	
01/16/24	BGR	WORK ON MEDIATION STATEMENT AND EXHBIT ISSUES	1.60	
01/16/24	KLB	GATHER PLEADINGS AND DOCUMENTS AND PREPARE E-BINDER FOR JANUARY 17, 2024 FIRST QUARTERLY STATUS CONFERENCE, AND EMAILS TO AND FROM M.	1.10	

F E E S

Date	Attorney	Description	Hours	
		NILES		
01/16/24	KLB	EMAILS FROM M. NILES AND PREPARE DRAFT COMPLAINT AGAINST ██████████ FOR UPCOMING MEDIATION	0.40	
01/16/24	MJN	CORRESPOND WITH W. DIAB REGARDING MEDIATION STATEMENT AND DISCUSS ISSUES; RESEARCH REGARDING THE SAME. [1.5 NO CHARGE]	0.00	N/C
01/16/24	MJN	CORRESPOND WITH E. BECKWITH REGARDING MEDIATION.	0.30	
01/16/24	MJN	CORRESPOND REGARDING ABRAMSON PROCEEDING AND SERVICE ISSUES; RESEARCH REGARDING THE SAME.	0.50	
01/16/24	MJN	CORRESPOND WITH T. CARUSO REGARDING SEARCH TERMS; RESEARCH IN CLOUD9 REGARDING LAWFIRM CORRESPONDENCE.	0.80	
01/16/24	MJN	PREPARE FOR OMNIBUS STATUS HEARING ON PROCEEDING SUPPLEMENTARY.	1.00	
01/16/24	MJN	ATTEND PREMEDIATION CALL WITH MEDIATOR; PROVIDE REQUESTED FOLLOW UP DOCUMENTS.	0.80	
01/16/24	MJN	ATTEND STERMER CALL TO DISCUSS AP AND ADDITIONAL OUTSTANDING ITEMS.	0.80	
01/16/24	WOD	DISCUSS MEDIATION STATEMENT AND STRATEGY WITH M. NILES.	0.50	
01/16/24	WOD	CALL WITH CLIENT AND LITIGATION TEAM RE: MULTI-LITIGATION MEDIATION STRATEGY.	1.00	
01/16/24	WOD	DRAFT MEDIATION STATEMENT AND EXHIBITS FOR MEDIATION WITH ██████████	10.50	
01/17/24	BGR	FOLLOW-UP ON HEARINGS/KATCHIS OFFER	0.90	
01/17/24	BGR	REVIEW MEMO ON FRAUDULENT TRANSFERS CLAIMS ON LIFE INSURANCE POLICIES AND PAYMENTS	0.90	
01/17/24	BGR	RESPOND TO INQUIRES FROM PEARCE ON ██████████	0.30	
01/17/24	MJN	REVIEW AND REVISE DRAFT COMPLAINT AGAINST ██████████ ██████████ FOR MEDIATION STATEMENT	0.40	
01/17/24	MJN	REVIEW MEDIATION STATEMENT; CORRESPOND WITH B.RICH AND W. DIAB REGARDING THE SAME.	1.00	
01/17/24	MJN	PREPARE FOR AND PRESENT AT OMNIBUS STATUS HEARING.	0.50	
01/17/24	MJN	REVIEW RESEARCH REGARDING LIFE INSURANCE POLICY PAYMENTS; FOLLOW UP WITH TEAM.	0.40	

F E E S

Date	Attorney	Description	Hours
01/17/24	MJN	CORRESPOND WITH T. CARUSO REGARDING DISCOVERY AND SEARCH TERMS. FOLLOW UP REGARDING THE SAME.	0.60
01/17/24	MJN	CORRESPOND WITH COUNSEL FOR THE KATCHIS FAMILY; RESEARCH REGARDING THE SAME; REVIEW ADDITIONAL DOCUMENTS AND INFORMATION PROVIDED. .	1.20
01/17/24	PH	RESEARCH AND DRAFT BRIEF MEMO FOR ISSUES CONCERNING LIFE INSURANCE POLICIES	4.10
01/18/24	BGR	ATTEND CALLS WITH CLIENT ON UPCOMING MEDIATIONS	0.60
01/18/24	BGR	FOLLOW-UP ON ████████ CALLS/MEETING	0.40
01/18/24	BGR	FOLLOW-UP ON KATCHIS ANALYSIS AND FORMULATE COUNTER-OFFER	0.60
01/18/24	BGR	REVIEW DRAFT MEDIATION STATEMENT	0.80
01/18/24	BGR	PREPARE DETAILED ANALYSIS OF ADVISOR CLAIM ISSUES	2.20
01/18/24	GCG	REVIEW AND REVISED DRAFT MEDIATION STATEMENT RE ████████ MEDIATION AND RELATED CLIENT EMAILS (.5); ATTENTION TO INTEREST RATE AND CORRESPONDENCES REGARDING KATCHIS CLAIMS (.3)	0.80
01/18/24	MJN	PREPARE SUMMARY REGARDING CALL WITH KATCHIS COUNSEL FOR RECEIVER; FOLLOW UP REGARDING THE SAME.	0.50
01/18/24	MJN	FURTHER REVIEW OF MEDIATION STATEMENT AND COMPLETED EXHIBITS.	0.50
01/18/24	MJN	CORRESPOND WITH T. CARUSO REGARDING PROMISSORY NOTES; RESEARCH REGARDING INTEREST RATES.	0.40
01/18/24	MJN	ATTEND CONFERENCE CALL WITH T. CARUSO AND D. STERMER REGARDING SEARCH TERMS AND LAW FIRM DISCOVERY. FOLLOW UP REGARDING SEARCH TERMS.	0.50
01/18/24	WOD	REVISE ████████ MEDIATION STATEMENT AND DELIVER TO CLIENT.	0.30
01/19/24	GCG	ATTEND STRATEGY CONFERENCE WITH CLIENT AND DSI REGARDING PELICAN TRANSACTIONS	0.50
01/19/24	MJN	PREPARE CORRESPONDENCE TO D. MAZANEC REGARDING RESPONSE TO SETTLEMENT OFFER	0.40
01/22/24	BGR	MEDIATION PREPARATION	0.90

F E E S

Date	Attorney	Description	Hours	
01/22/24	KLB	UPDATE SERVICE TRACKER FOR AVOIDANCE ACTIONS TO REFLECT SERVICE UPON J. ABRAMSON AND EMAILS TO M. NILES REGARDING STATUS	0.30	
01/22/24	MJN	DISCUSS STATUS CALL WITH K. BURNS.	0.30	
01/22/24	MJN	PREPARE FOR MEDIATION AND REVIEW ADDITIONAL EMAILS AND DOCUMENTS RELATED TO [REDACTED]	1.00	
01/22/24	WOD	FINALIZE [REDACTED] MEDIATION STATEMENT. [.5 NO CHARGE]	0.00	N/C
01/22/24	PH	COMPILE ADDITIONAL INFO ON DICEMBRINO AND TEPPER FOR MEDIATION STATEMENTS	2.80	
01/23/24	BGR	[REDACTED] MEDIATION PREPARATION	0.90	
01/23/24	GCG	[REDACTED] MEDIATION SUBMITTAL AND RELATED EMAILS [.3 NO CHARGE]	0.00	N/C
01/23/24	GCG	FOLLOW UP EMAIL MEMO TO A. RUTTENBERG RE PELICAN SETTLEMENT COMMUNICATIONS	0.40	
01/23/24	MJN	FINALIZE AND TRANSMIT MEDIATION STATEMENT TO MEDIATOR AND OPPOSING COUNSEL.;	0.60	
01/23/24	MJN	CORRESPOND WITH COUNSEL FOR KATCHIS FAMILY REGARDING SETTLEMENT OFFER.	0.30	
01/23/24	WOD	REVISE AND FINALIZE [REDACTED] MEDIATION STATEMENT. [.2 NO CHARGE]	0.00	N/C
01/24/24	BGR	MEDIATION PREPARATION ISSUES	1.20	
01/24/24	MJN	CALL WITH MEDIATOR TO DISCUSS DICEMBRINO, EMMETS MEDIATION; FOLLOW UP WITH TEAM REGARDING THE SAME.	0.90	
01/24/24	MJN	RESEARCH REGARDING MCM LANDLORD ADMIN CLAIM.	2.50	
01/24/24	MJN	CORRESPOND WITH K. APPLEBY AND R. SCHINDLER REGARDING MEDIATION.	0.30	
01/24/24	WOD	PREPARE DRAFT MEDIATION SETTLEMENT AGREEMENT.	2.00	
01/25/24	BGR	[REDACTED] MEDIATION PREPARATION; CALL WITH MEDIATOR (.5) INTERNAL PREPARATION CALL. (.5) REVIEW DOCUMENTS AND MEDIATION STATEMENTS (.8)	1.80	
01/25/24	BGR	REVIEW AND WORK ON RESPONSE TO KATCHIS OFFER	0.80	
01/25/24	BGR	REVIEW AND WORK ON PSTC ISSUES	0.60	

F E E S

Date	Attorney	Description	Hours	
01/25/24	GCG	WORK ON POWERPOINT FOR MEDIATION OF ██████████ CLAIMS (.5); STRATEGY MEETING WITH D. STERMER AND BERGER SINGERMAN TEAM (.5); TELEPHONE CONFERENCE WITH MEDIATOR ROY KOLBERT AND FOLLOW UP CONFERENCE CALL (.9); EMAIL TO COUNSEL FOR ██████████ (.1); EMAIL TO/FROM COUNSEL FOR PELICAN (.1); CONFER WITH D. STERMER (.1)	2.20	
01/25/24	MJN	ATTEND CONFERENCE CALL WITH MEDIATOR AND FOLLOW UP CALL WITH CLIENT REGARDING MEDIATION; FOLLOW UP RESEARCH REGARDING THE SAME AND DISCUSSION ON COMMISSIONS.	3.00	
01/25/24	MJN	CORRESPOND WITH R.KOBERT REGARDING EMMETS MEDIATION.	0.40	
01/25/24	MJN	REVIEW MEDIATION STATEMENT RESPONSE PROVIDED BY COUNSEL; REVIEW PROPOSED SETTLEMENT AGREEMENT.	0.80	
01/25/24	MJN	CORRESPOND WITH TEAM REGARDING PROPOSED SETTLEMENT WITH KATCHIS FAMILY. [.3 NO CHARGE]	0.00	N/C
01/25/24	WOD	PREPARE MEDIATION PRESENTATION.	2.00	
01/25/24	WOD	REVISE MEDIATION PRESENTATION. [.3 NO CHARGE]	0.00	N/C
01/25/24	WOD	PRE-MEDIATION CALL WITH MEDIATOR (0.5); PRE-MEDIATION CALL WITH CLIENT AND LITIGATION TEAMS (0.5) FOR MEDIATION WITH ██████████	1.00	
01/26/24	BGR	ATTEND ██████████ MEDIATION AND FOLLOW-UP ON SAME [4.4 NO CHARGE]	0.00	N/C
01/26/24	BGR	REVIEW PAYROLL RECORDS FROM ██████████ ON PAYMENT ISSUES	0.60	
01/26/24	GCG	TO/FROM AND ATTEND MEDIATION RE ██████████ WITH D. STERMER	7.50	
01/26/24	MJN	PREPARE FOR AND ATTEND ██████████ MEDIATION [5.0 NO CHARGE]	0.00	N/C
01/26/24	MJN	PREPARE CORRESPONDENCE TO KATCHIS FAMILY COUNSEL.	0.40	
01/26/24	WOD	ATTEND MEDIATION WITH ██████████ [5.0 NO CHARGE]	0.00	N/C
01/29/24	BGR	PREPARE FOR AND ATTEND TEAM CALL ON ██████████ DOCUMENTS AND NEXT STEPS IN MEDIATION(S)	0.90	
01/29/24	GCG	CLIENT STRATEGY CONFERENCE WITH D. STERMER, P. OMALLEY, G. BRENNER, B. RICH, W. DIAB, M. NILES REGARDING ██████████ MEDIATION (.9); EMAIL	1.30	

F E E S

Date	Attorney	Description	Hours	
		TO/FROM MEDIATOR KOBERT AND COUNSEL FOR [REDACTED] WITH THE PFS AND REVISE FORM OF PFS (.2); EMAILS TO/FROM D. STERMER AND B. RICHI REGARDING HOLTZ ESTATE LITIGATION AND INTERVIEW RE A. HOLTZ (.2)		
01/29/24	MJN	PREPARE FOR AND ATTEND CONFERENCE CALL WITH TEAM TO DISCUSS MEDIATIONS.	0.60	
01/29/24	MJN	CORRESPOND WITH C. MILLER REGARDING DEMAND TO FIFTH AVENUE PHYSICIAN SERVICES.	0.30	
01/29/24	WOD	CALL WITH CLIENT AND LITIGATION TEAM RE: UPCOMING MEDIATION STRATEGY.	0.50	
01/30/24	BGR	REVIEW [REDACTED] FINANCIAL ISSUES	0.90	
01/30/24	KLB	REVIEW EMAIL FROM G. GAUKROGER REGARDING EXTENSION OF TIME TO COMMENCE ACTION ON OBJECTION TO RECEIVER'S CLAIM AND PREPARE PROPOSED AGREED ORDER EXTENDING TIME; FORMAT AND SUBMIT PROPOSED AGREED ORDER	0.30	
01/30/24	GCG	CALLS AND EMAILS TO/FROM G. WOODFIELD REGARDING HOLTZ PROBATE AND INTERVIEW AND FOLLOW UP REGARDING AGREED ORDER FOR SUBMISSION TO COURT (.3)	0.30	
01/30/24	MJN	REVIEW DOCUMENTS PROVIDED BY E. BECKWITH REGARDING MEDIATION.	0.30	
01/30/24	PH	DISCOVERY STRATEGY DISCUSSION WITH WILLIAM DIAB [.2 NO CHARGE]	0.00	N/C
01/31/24	BGR	PREPARE FOR AND ATTEND CALL WITH PELICAN CAPITAL MANAGEMENT	1.00	
01/31/24	KLB	EMAILS REGARDING REJECTION OF PROPOSED AGREED ORDER EXTENDING TIME TO COMMENCE ACTION ON OBJECTION TO CLAIM IN HOLTZ PROBATE CASE	0.20	
01/31/24	KLB	PREPARE DECLARATION OF G. GAUKROGER REGARDING COMMUNICATIONS WITH GARY WOODFIELD RELATING TO REQUEST FOR EXTENSION (.6); FINALIZE, FORMAT AND E-FILE DECLARATION (.2)	0.80	
01/31/24	KLB	REVISE PROPOSED AGREED ORDER AND RESUBMIT SAME WITH RESPECT TO EXTENSION OF TIME TO COMMENCE ACTION ON OBJECTION TO CLAIM IN PROBATE CASE	0.20	
01/31/24	GCG	PREPARE FOR (.4) AND HOST VIDEOCONFERENCE WITH COUNSEL FOR PELICAN, ADAM RUTTENBERG, WITH B. RICH (.6); DRAFT SUMMARY EMAIL MEMO TO	1.30	

F E E S

Date	Attorney	Description	Hours	
		DSI AND RECEIVER STERMER (.3)		
01/31/24	MJN	CORRESPOND WITH TEAM REGARDING MCM LANDLORD ADMIN CLAIM	0.40	
01/31/24	MJN	REVIEW AND REVISE SEARCH TERMS FOR SUBPOENA; CORRESPOND WITH T. CARUSO REGARDING THE SAME.	0.60	
02/01/24	BGR	PREPARE FOR MEDIATION	1.80	
02/01/24	BGR	CALL WITH CLIENT AND OFR	1.00	
02/01/24	KLB	REVIEW EMAILS FROM M. FERNANDES OF CSC REGARDING CORPORATE SERVICE FEES, ETC. AND EMAILS TO D. STERMER	0.20	
02/01/24	MJN	CORRESPOND WITH D. MAZANEC REGARDING SETTLEMENT DISCUSSIONS. FOLLOW UP REGARDING THE SAME.	0.40	
02/02/24	KLB	INITIAL PREPARATION OF RECEIVER'S THIRD REPORT AND EMAILS TO AND FROM B. RICH	0.90	
02/02/24	MJN	CORRESPOND AND PREPARE FOR UPCOMING MEDIATIONS; CORRESPOND WITH TEAM REGARDING THE SAME.	1.40	
02/02/24	PH	ADDITIONAL SUSSMAN RESEARCH FOR MEDIATION STATEMENT	0.50	
02/05/24	BGR	MEDIATION ANALYSIS AND PREPARE	1.90	
02/05/24	KLB	DISCUSSIONS WITH M. NILES REGARDING STATUS OF AVOIDANCE ACTIONS AND NEGOTIATIONS WITH OTHER INDIVIDUALS AND ENTITIES AND UPDATE RECEIVER'S THIRD REPORT; EMAILS TO B. RICH REGARDING SAME	0.60	
02/05/24	KLB	REVIEW EMAIL FROM D. STERMER REGARDING INVOICE FOR CORPORATE SERVICE FEES, ETC [.1 NO CHARGE]	0.00	N/C
02/05/24	KLB	REVIEW CHART PREPARED BY M. NILES OF UPCOMING MEDIATIONS AND UPDATE AVOIDANCE ACTIONS CHART; EMAILS REGARDING PREPARATION OF NOTICES OF MEDIATION	0.40	
02/05/24	KLB	PREPARE FOUR NOTICES OF MEDIATION FOR ACTIONS AGAINST DICEMBRINO, EMMETS, SUMMSMAN, AND TEPPER (.8); EMAILS TO AND FROM M. NILES REGARDING UPCOMING MEDIATIONS (.1)	0.90	
02/05/24	KLB	FINALIZE, FORMAT AND E-FILE FOUR NOTICES OF MEDIATION AND EMAILS TO R. KOBERT AND P. KING WITH MEDIATION NOTICES	0.60	

F E E S

<u>Date</u>	<u>Attorney</u>	<u>Description</u>	<u>Hours</u>	
02/05/24	MJN	REVIEW DOCUMENTS REGARDING DICEMBRINO, EMMETS, AND TEPPER; FOLLOW UP WITH W. DIAB REGARDING MEDIATION STATEMENTS.	1.00	
02/05/24	MJN	CORRESPOND WITH C. ZADONSKY REGARDING ABRAMSON COMPLAINT.	0.50	
02/05/24	MJN	REVIEW MEDIATION NOTICES; CORRESPOND WITH K. BURNS REGARDING THE SAME. [.4 NO CHARGE]	0.00	N/C
02/06/24	BGR	WORK ON KATCHIS REPSONSE	0.60	
02/06/24	BGR	MEDIATION PREPARATION/CALLS WITH MEDIATOR	0.90	
02/06/24	BGR	WORK ON LITIGATION CLAIM ANALYSIS	1.60	
02/06/24	KLB	EMAILS TO AND FROM M. NILES REGARDING UPCOMING MEDIATIONS, FLORIDA RULES RELATING TO FILING OF NOTICE RELATING TO PARTIES WHO WILL PARTICIPATE IN MEDIATION, ETC. [.2 NO CHARGE]	0.00	N/C
02/06/24	MJN	CORRESPOND WITH C. ZADANOSKY REGARDING ABRAMSON DEMAND AND COMPLAINT; REVIEW PLEADINGS FILED.	1.20	
02/06/24	MJN	CORRESPOND WITH D. MAZANEC REGARDING POTENTIAL SETTLEMENT.	0.70	
02/06/24	MJN	REVIEW MEDIATION SCHEDULE AND PREPARATION WITH K. BURNS. [.4 NO CHARGE]	0.00	N/C
02/06/24	MJN	REVIEW OFFER FROM D. MAZANEC; FOLLOW UP WITH D. STERMER REGARDING THE SAME.	0.40	
02/06/24	WOD	REVIEW SEEMAN HOLTZ DOCUMENTS IN CLOUD 9 RE: ADVISORS DECIMBRINO, TEPPER, AND EMMETS.	0.70	
02/06/24	PH	REVIEWING SUSSMAN DISCOVERY FOR PREPARATION OF MEDIATION STATEMENT	1.50	
02/06/24	PH	UPDATE EVIDENCE SPREADSHEET WITH SUSSMAN EMAILS	0.80	
02/07/24	BGR	CALL ON COMMISSIONS AND ANALYSIS	1.20	
02/07/24	KLB	EMAILS TO D. STERMER WITH RECEIVER'S REPORT AND REVIEW ADDITIONAL COMMENTS OF SAME (.3); EMAILS TO D. STERMER REGARDING CASH FLOW CHART AND FINALIZE AND FORMAT RECEIVER'S REPORT (.2); E-FILE REPORT AND INCLUDE LIVE LINKS TO PRIOR REPORTS IN FILED RECEIVER'S REPORT, EMAILS TO D. STERMER (.3)	0.80	
02/07/24	KLB	REVIEW EMAIL REGARDING REGISTERED AGENT SERVICES, ETC.; TELEPHONE CALL TO CT CORPORATE SERVICES REGARDING FILING OF RESIGNATION AS	0.40	

F E E S

Date	Attorney	Description	Hours	
		TO REGISTERED AGENTS		
02/07/24	GCG	CLIENT STRATEGY CONFERENCE REGARDING CLAIMS AGAINST BROKERS	1.00	
02/07/24	MJN	RESEARCH IN CLOUD9 AND PRIOR SPREADSHEETS REGARDING ADVISOR COMPENSATION; ATTEND CONFERENCE CALL REGARDING THE SAME.	2.30	
02/07/24	WOD	MEDIATION STRATEGY MEETING FOR DEFENDANTS DICEMBRINO, TEPPER, AND EMMETS.	1.00	
02/07/24	WOD	ANALYZE DOCUMENTS IN CLOUD9 SERVER FOR INFORMATION RELATING TO DICEMBRINO, TEPPER, AND EMMETS INVOLVEMENT IN SCHEME.	2.20	
02/07/24	PH	STRATEGY DISCUSSION WITH WILLIAM DIAB	0.20	
02/07/24	PH	REVIEW DOCUMENTS FOR EMMETS MEDIATION STATEMENT	1.00	
02/08/24	BGR	FURTHER ANALYSIS ON AGENT COMMISSION ISSUES; ALPHA STAFF INTERPLAY	2.60	
02/08/24	GCG	ATTEND LITIGATION STRATEGY WITH B. RICH [.4 NO CHARGE]	0.00	N/C
02/08/24	MJN	CORRESPOND WITH C. MILLER REGARDING DEMAND TO FIFTH AVENUE PHYSICIANS SERVICES, LLC	0.30	
02/08/24	MJN	CORRESPOND WITH D. MAZANEC REGARDING SETTLEMENT TERMS.	0.50	
02/08/24	WOD	RECEIPT AND REVIEW OF ADVISOR COMPENSATION ANALYSIS FROM CLIENT TO PREPARE FOR MEDIATION.	0.50	
02/08/24	WOD	ANALYZE DOCUMENTS IN CLOUD9 IN SEARCH FOR ADDITIONAL EVIDENCE RE: INVOLVEMENT OF TEPPER/DICEMBRINO/ AND EMMETS IN SH SCHEME IN PREPARATION FOR MEDIATION.	1.50	
02/09/24	BGR	ATTEND TEAM CALL ON STATUS OF AGENT COMMISSIONS, FURTHER DETAILED ANALYSIS AND FOLLOW-UP ON SAME [1.9 NO CHARGE]	0.00	N/C
02/09/24	BGR	MEDIATION PREPARARATION/ISSUES	0.90	
02/09/24	GCG	CONFERENCE WITH RECEIVER, DSI, AND BSLLP TEAM REGARDING AGENT MEDIATION ISSUES (.8); FOLLOW UP WITH G. WOODFIELD RE INTERVIEW WITH A. HOLTZ (.1); FOLLOW UP WITH COUNSEL FOR [REDACTED] RE [REDACTED] MEDIATION II (.1)	1.00	
02/09/24	MJN	ATTEND CONFERENCE CALL WITH RECEIVERSHIP TEAM TO DISCUSS MEDIATIONS AND ADDITIONAL DUE DILIGENCE; RESEARCH REGARDING THE SAME.	2.00	

F E E S

<u>Date</u>	<u>Attorney</u>	<u>Description</u>	<u>Hours</u>	
02/09/24	WOD	CALL WITH CLIENT AND DSI TEAM TO DISCUSS COMPENSATION SCHEME ANALYSIS. [1.0 NO CHARGE]	0.00	N/C
02/09/24	WOD	ANALYZE ALPHASTAFF SUBPOENA, HISTORY OF COMMUNICATIONS, AND NSI TAX LETTER, AND DRAFT FOLLOW UP TO COUNSEL RE: INCOMPLETE PRODUCTION.	1.00	
02/09/24	WOD	CONFERENCE CALL WITH TAYLOR FROM DSI RE: ALPHA STAFF PRODUCTION AND CLOUD9 MISSING DOCUMENTS.	0.50	
02/09/24	WOD	RECEIPT AND REVIEW OF SEVERAL COMMUNICATIONS FROM DSI AND LITIGATION TEAM RE: COMPENSATION ANALYSIS, UPCOMING MEDIATIONS, AND ALPHA STAFF SUBPOENA COMPLIANCE.	0.50	
02/09/24	PH	UPDATE EVIDENCE SPREADSHEET + ADDITIONAL EMMETS RESEARCH	2.00	
02/10/24	MJN	CORRESPOND WITH W. DIAB REGARDING MEDIATIONS [4 NO CHARGE]	0.00	N/C
02/10/24	WOD	ANALYZE DOCUMENTS IN CLOUD9 IN SEARCH OF EVIDENCE OF PARTICIPATION IN SH SCHEME BY DECIMBRINO/TEPPER/EMMETS IN ADVANCE OF MEDIATION.	5.00	
02/11/24	MJN	REVIEW AND REVISE MEDIATION STATEMENT; FOLLOW UP WITH W.DIAB REGARDING THE SAME.	1.00	
02/11/24	WOD	DRAFT MEDIATION STATEMENT AND EXHIBITS FOR DECIMBRINO AND TEPPER MEDIATION.	9.00	
02/12/24	BGR	MEDIATION ANALYSIS AND WORK ON CLAWBACK CLAIM ISSUES	2.30	
02/12/24	MJN	CORRESPOND WITH W. DIAB REGARDING MEDIATIONS. [4 NO CHARGE]	0.00	N/C
02/12/24	MJN	CORRESPOND WITH COUNSEL FOR THE KATCHIS REGARDING SETTLEMENT; FOLLOW UP WITH TEAM REGARDING THE SAME.	0.50	
02/12/24	WOD	DRAFT MEDIATION STATEMENT AND EXHIBITS FOR EMMETS MEDIATION.	6.00	
02/12/24	WOD	MEET AND CONFER CALL WITH ALPHA STAFF RE: COMPLIANCE WITH SUBPOENA.	1.00	
02/12/24	WOD	REVIEW AND REVISE FOLLOW-UP EMAIL TO MEET AND CONFER CALL WITH ALPHA STAFF.	0.30	
02/12/24	PH	REVIEW MEDIATION STATEMENTS AND STRATEGY DISCUSSION WITH WD [3 NO CHARGE]	0.00	N/C

F E E S

Date	Attorney	Description	Hours	
02/13/24	BGR	REVIEW DOCUMENTS AND ISSUES RELATED TO COMMISSION CLAIMS SUBJECT TO PENDING LAWSUITS AND CALLS AND REVIEW OF DOCUMENTS RELATED TO SAME.	2.80	
02/13/24	BGR	ATTEND STATUS CALL	0.90	
02/13/24	MJN	FOLLOW UP WITH MEDIATION RESCHEDULING. [.6 NO CHARGE]	0.00	N/C
02/13/24	MJN	PREPARE FOR AND ATTEND CONFERENCE CALL WITH DSI TEAM TO DISCUSS PENDING ISSUES.	1.00	
02/13/24	WOD	LITIGATION STRATEGY MEETING WITH LITIGATION TEAM, CLIENT, AND DSI TEAM.	1.00	
02/14/24	BGR	REVIEW AND ANALYSIS OF ADVISOR ISSUES/DOCUMENTS FOR AIDING AND ABETTING AND ADDITIONAL COMMISSION CLAWBACK CLAIMS	1.60	
02/14/24	KLB	PREPARE MOTION TO EXTEND DEADLINE TO CONDUCT MEDIATIONS AND PREPARE PROPOSED ORDER GRANTING SAME; DISCUSSIONS WITH AND EMAILS TO M. NILES REGARDING POSTPONEMENT OF MEDIATIONS FOR FIVE RECOVERY ACTIONS	1.40	
02/14/24	MJN	CONFERENCE CALL WITH DSI TEAM TO DISCUSS COMPENSATION STRUCTURE OF BROKERS. FOLLOW UP REGARDING THE SAME.	1.00	
02/14/24	MJN	CORRESPOND WITH C. ZADANOSKY REGARDING MEDIATION WITH J. ABRAMSON.	0.40	
02/14/24	WOD	ATTEND CONFERENCE CALL WITH CLIENT AND DSI TEAM RE: COMMISSION COMPENSATION ANALYSIS. [.5 NO CHARGE]	0.00	N/C
02/14/24	WOD	RECEIPT AND REVIEW OF SEVERAL EMAIL DOCUMENTS FROM CLIENT RE: SH SCHEME TO PREPARE FOR ADVISOR MEDIATIONS.	0.50	
02/15/24	BGR	MEDIATION ANALYSIS AND DISCUSSION	1.30	
02/15/24	MJN	REVIEW FINANCIAL DOCUMENTS PROVIDED BY ZUCKERBROD; CORRESPOND WITH G. BRENNER REGARDING THE SAME.	0.50	
02/15/24	MJN	PREPARE CORRESPONDENCE REGARDING KATCHIS SETTLEMENT.	0.40	
02/15/24	MJN	CORRESPOND WITH TEAM REGARDING PENDING MEDIATIONS; FOLLOW UP WITH OPPOSING COUNSEL AND MEDIATORS.	1.00	
02/15/24	WOD	RECEIPT AND REVIEW OF SEVERAL EMAILS AND DOCUMENTS FROM CLIENT RE: COMPENSATION AND	0.50	

F E E S

Date	Attorney	Description	Hours	
		COMMISSION ANALYSIS TO PREPARE FOR MEDIATION.		
02/16/24	BGR	ATTEND MULTIPLE CALLS ON MEDIATION ISSUES	0.90	
02/16/24	KLB	REVIEW EMAILS REGARDING SCHEDULING OF MEDIATIONS FOR R. DONOFF, [REDACTED] AND J. PALUZZI AND PREPARE INITIAL DRAFT OF NOTICE OF MEDIATION	0.50	
02/16/24	KLB	REVIEW EMAILS FROM M. FERNANDEZ OF CSC REGARDING CORPORATE SERVICES INVOICE AND ARRANGE FOR PAYMENT OF SAME [.2 NO CHARGE]	0.00	N/C
02/16/24	MJN	CORRESPOND WITH K. APPLEBY AND R.SCHIDNLER REGARDING MEDIATIONS; FOLLOW UP WITH TEAM REGARDING THE SAME.	0.40	
02/16/24	MJN	REVIEW CORRESPONDENCE PROVIDED BY D. STERMER REGARDING MEDIATION TARGETS.	0.80	
02/19/24	BGR	PREPARE FOR AND ATTEND CALL ON MEDIATION ANALYSIS AND ISSUES	1.50	
02/19/24	KLB	REVIEW EMAILS REGARDING SCHEDULING OF MEDIATIONS IN BOCA RATON, FLORIDA AND REVISE NOTICE OF MEDIATION; REVIEW EMAILS REGARDING RESCHEDULING OF MEDIATION IN AVOIDANCE ACTIONS	0.30	
02/19/24	KLB	EMAILS REGARDING FILING OF MOTION TO EXTEND TIME TO CONDUCT MEDIATIONS AND REVISE MOTION AND PROPOSED ORDER	0.40	
02/19/24	MJN	WORK ON MATTERS RELATED TO MEDIATION (2.0); CONFERENCE CALL WITH D. STERMER AND B.RICH (.5) [.5 NO CHARGE]	2.00	
02/19/24	MJN	CORRESPOND WITH T.CARUSO AND G.BRENNER REGARDING ADDITIONAL DEMANDS.	0.30	
02/19/24	WOD	RECEIPT AND REVIEW OF EXTENSIVE INFORMATION AND EVIDENCE FROM CLIENT RE: COMMISSION AND COMPENSATION SCHEME IN PREPARATION FOR MEDIATION.	0.50	
02/20/24	MJN	CORRESPOND WITH TEAM REGARDING MEDIATIONS.	0.30	
02/20/24	MJN	REVIEW CORRESPONDENCE FROM KATCHIS; FOLLOW UP WITH TEAM REGARDING THE SAME.	0.30	
02/21/24	BGR	WORK ON REVISED MEDIATION ANALYSIS	1.20	
02/21/24	KLB	REVISE MOTION TO EXTEND TIME TO CONDUCT MEDIATIONS AND EMAILS TO AND FROM M. NILES	0.40	
02/21/24	KLB	REVIEW MULTIPLE EMAILS TO COORDINATE	0.60	

F E E S

Date	Attorney	Description	Hours
		RESCHEDULING OF THREE MEDIATIONS AND PREPARE FOUR RE-NOTICES OF MEDIATION	
02/21/24	MJN	REVIEW FINANCIAL STATEMENT OF ██████████	0.40
02/21/24	MJN	CORRESPOND WITH KATCHIS REGARDING SETTLEMENT; FOLLOW UP WITH TEAM REGARDING THE SAME.	0.40
02/21/24	MJN	REVIEW DOCUMENTS FOR M.TAYLOR DEMAND.	0.40
02/21/24	MJN	REVISE MEDIATION EXTENSION MOTION; FOLLOW UP WITH OPPOSING COUNSEL REGARDING THE SAME.	0.50
02/22/24	BGR	WORK ON KATCHIS SETTLEMENT ISSUES	0.80
02/22/24	BGR	WORK ON MEDIATION ANALYSIS ISSUES	0.90
02/22/24	KLB	REVISE AND FINALIZE AGREED MOTION TO EXTEND TIME TO CONDUCT MEDIATIONS AND REVISE AND FINALIZE PROPOSED AGREED ORDER; FORMAT AND E-FILE AGREED MOTION	0.70
02/22/24	KLB	PREPARE COVER LETTER TO JUDGE HARPER WITH PROPOSED AGREED ORDER EXTENDING DEADLINE TO CONDUCT MEDIATIONS AND EMAILS TO B. RICH AND M. NILES REGARDING SAME	0.60
02/22/24	MJN	CORRESPOND WITH D. MAZANEC REGARDING KATCHIS SETTLEMENT; FOLLOW UP WITH D.STERMER REGARDING THE SAME; REVISE SETTLEMENT AGREEMENT REGARDING THE SAME.	1.20
02/22/24	MJN	CORRESPOND WITH T. GRANER AND R. PEARCE REGARDING MEDIATION MOTION; REVIEW AND REVISE MOTION FOR FILING.	0.40
02/23/24	BGR	REVIEW KATCHIS DRAFT AGREEMENT	0.80
02/23/24	BGR	WORK ON NEXT ROUND OF MEDIATION ANALYSIS	0.90
02/23/24	BGR	WORK ON LITIGATION ANALYSIS	1.60
02/23/24	KLB	REVISE AND FINALIZE CORRESPONDENCE TO JUDGE HARPER AND FORMAT FOR SUBMISSION; GATHER FILED MOTION AND PROPOSED ORDER AND SUBMIT WITH COVER LETTER; PREPARE FOR SERVICE BY EMAIL UPON COUNSEL	0.80
02/23/24	KLB	PREPARE MULTIPLE EMAILS TO COUNSEL FOR DEFENDANTS IN AVOIDANCE ACTIONS WITH SERVICE OF MOTION AND LETTER REGARDING EXTENDING TIME TO CONDUCT MEDIATIONS	0.20
02/23/24	MJN	CORRESPOND WITH D. MAZANEC REGARDING SETTLEMENT AGREEMENT; REVISE SETTLEMENT AGREEMENT AND CORRESPOND WITH D. STERMER	0.50

F E E S

Date	Attorney	Description	Hours	
		REGARDING THE SAME.		
02/23/24	MJN	REVIEW CORRESPONDENCE FROM T. CARUSO REGARDING BROKERS.	0.40	
02/26/24	BGR	REVIEW AND RESPOND TO INQUIRES ON GREY SWAN AND ANONYMOUS EMAILS	0.80	
02/26/24	KLB	REVIEW EMAIL REGARDING FILING OF ANNUAL REPORTS AND GATHER FILED ANNUAL REPORTS FOR 2023 FOR FLORIDA ENTITIES, AND EMAILS TO D. STERMER REGARDING CHANGES IN ADDRESS, ETC.; UPDATE CORPORATE CHART	0.80	
02/26/24	KLB	ARRANGE FOR FILING OF TWO ANNUAL REPORTS WITH FLORIDA DEPARTMENT OF STATE AND PAYMENT OF FEES ASSOCIATED WITH SAME (.5); ASSIST WITH PAYMENT OF DELAWARE TAXES FOR TWO RECEIVERSHIP ENTITIES AND EMAILS TO J. ROMAN REGARDING PAYMENT TO GEORGIA DEPARTMENT OF STATE FOR TWO PARA LONGEVITY ENTITIES (.5)	1.00	
02/26/24	MJN	REVIEW CLOUD9 DOCUMENTS AND UPDATED MEDIATION STATEMENTS.	1.50	
02/26/24	WOD	RECEIPT AND REVIEW OF SEVERAL CORRESPONDENCES AND EVIDENCE FROM CLIENT RE: COMMISSION AND COMPENSATION SCHEME TO PREPARE IN ADVANCE OF MEDIATIONS.	0.50	
02/27/24	BGR	FURTHER ANALYSIS OF TARGET LIST AND POTENTIAL CLAIMS	1.50	
02/27/24	KLB	REVISE AND FINALIZE NOTICE OF MEDIATION FOR MEDIATIONS OF DONOFF, PALUZZI, [REDACTED] AND [REDACTED] AND FORMAT AND PREPARE FOR SERVICE OF SAME	0.30	
02/27/24	KLB	REVISE AND FINALIZE NOTICE OF MEDIATION FOR MEDIATION WITH D. EMMETS AND FORMAT AND E-FILE NOTICE; EMAILS TO AND FROM MEDIATOR WITH NOTICE OF MEDIATION	0.40	
02/27/24	KLB	REVISE AND FINALIZE NOTICES OF MEDIATION FOR MEDIATIONS WITH A. DICEMBRINO AND D. TEPPER; FORMAT AND E-FILE TWO NOTICES OF MEDIATION AND EMAILS TO MEDIATOR REGARDING SAME	0.60	
02/27/24	MJN	CONFERENCE CALL WITH TEAM TO DISCUSS MEDIATIONS AND OTHER OUTSTANDING ITEMS [1.0 NO CHARGE]	0.00	N/C
02/27/24	MJN	CONFERENCE CALL WITH KATCHIS COUNSEL REGARDING SETTLEMENT AGREEMENT.	0.50	

F E E S

Date	Attorney	Description	Hours	
02/27/24	WOD	STRATEGY MEETING WITH CLIENT AND DSI TEAM AND LITIGATION TEAM.	1.00	
02/27/24	WOD	RECEIPT AND REVIEW OF SEVERAL CORRESPONDENCES FROM CLIENT RE: COMMISSION AND COMPENSATION SCHEME IN PREPARATION FOR MEDIATION.	0.50	
02/28/24	BGR	WORK ON MEDIATION LOGISTICS [1.2 NO CHARGE]	0.00	N/C
02/28/24	BGR	FOLLOW-UP ON OFR ISSUES AND NEXT STEPS	0.90	
02/28/24	BGR	WORK ON TARGET SUMMARY	0.90	
02/28/24	KLB	REVIEW EMAIL REGARDING AVAILABILITY FOR MEDIATION, AND PREPARE RE-NOTICE OF MEDIATION FOR SUSSMAN MEDIATION; REVIEW EMAILS FROM R. PEARCE REGARDING SAME	0.30	
02/28/24	KLB	REVIEW PROPOSED ORDER REGARDING AVOIDANCE ACTIONS AND REVIEW DRAFT SETTLEMENT AGREEMENT WITH KATHIS; PREPARE INITIAL DRAFT OF MOTION TO APPROVE SETTLEMENT	1.30	
02/28/24	KLB	REVIEW EMAIL FROM AND TO M. NILES AND UPDATE MASTER CHART [.3 NO CHARGE]	0.00	N/C
02/28/24	KLB	EMAILS REGARDING SUBPOENA TO DASZKAL BOLTON AND RESEARCH REGARDING RESPONSE TO SAME	0.20	
02/28/24	MJN	FINALIZE MEDIATION SCHEDULE FOR VARIOUS TARGETS; FOLLOW UP WITH TEAM REGARDING THE SAME. [.6 NO CHARGE]	0.00	N/C
02/28/24	MJN	FOLLOW UP WITH M. FERRO REGARDING SETTLEMENT.	0.30	
02/28/24	MJN	WORK ON TASK LIST (1.2); REVIEW DOCUMENTS RECEIVED FROM VARIOUS TARGETS (1.1).	2.30	
02/28/24	MJN	REVIEW AND REVISE KATCHIS SETTLEMENT AGREEMENT	0.50	
02/28/24	MJN	WORK ON TASK LIST.	0.70	
02/28/24	MJN	CORRESPOND WITH COUNSEL FOR ABRAMSON REGARDING MEDIATION AND ANSWER DEADLINE	0.30	
02/29/24	BGR	CALL WITH CLIENT AND AH REGARDING INFORMATION	1.00	
02/29/24	BGR	CALL REGARDING ANALYSIS FOR POTENTIAL CLAIMS/WITH POTENTIAL CONTINGENCY COUNSEL	0.80	
02/29/24	MJN	CONFERENCE CALL REGARDING LOCKE LORD; REVIEW DOCUMENTS PROVIDED; FOLLOW UP	1.00	

F E E S

Date	Attorney	Description	Hours	
		REGARDING THE SAME.		
02/29/24	MJN	REVIEW REVISIONS TO KATCHIS AGREEMENT; FOLLOW UP WITH COUNSEL REGARDING THE SAME.	0.50	
02/29/24	MJN	FINALIZE TASK LIST AND CIRCULATE WITH TEAM. [.4 NO CHARGE]	0.00	N/C
03/01/24	BGR	REVIEW FILED CLAIMS	0.80	
03/01/24	BGR	PREPARE FOR CALL WITH OFR AND WORK ON DISCOVERY ISSUES RLEATED THERETO	1.30	
03/01/24	KLB	REVIEW EMAILS REGARDING AVAILABILITY FOR MEDIATION, AND REVISE AND FINALIZE NOTICE OF MEDIATION FOR J. SUSSMAN; FORMAT AND E-FILE NOTICE OF MEDIATION AND EMAILS TO MEDIATOR	0.40	
03/01/24	KLB	REVIEW FULLY EXECUTED SETTLEMENT AGREEMENT WITH THE KATCHIS FAMILY AND UPDATE DRAFT MOTION TO APPROVE SAME (.5); PREPARE PROPOSED ORDER GRANTING MOTION TO APPROVE SETTLEMENT AND EMAILS TO TEAM (.6)	1.10	
03/01/24	MJN	CORRESPOND WITH TEAM REGARDING MEDIATION SCHEDULING.	0.30	
03/01/24	MJN	REVIEW ORDER EXTENDING MEDIATION DEADLINE IN ABRAMSON FILING. CORRESPOND REGARDING THE SAME.	0.30	
03/03/24	MJN	CORRESPOND WITH KATCHIS COUNSEL REGARDING SETTLEMENT; REVIEW PROPOSED SETTLEMENT MOTION.	0.50	
03/03/24	MJN	REVIEW COMPLAINTS REGARDING PONZI AND THIRD-PARTY BANKS.	0.60	
03/04/24	BGR	PREPARE FOR AND ATTEND CALL WITH OFR ON DOCUMENTS AND CONFIDENTIALITY ORDER	1.00	
03/04/24	BGR	FURTHER ANLAYSIS OF LITIGATION CLAIMS AND ANALYSIS FOR CONTIGENCY COUNSEL	0.90	
03/04/24	KLB	REVIEW EMAILS REGARDING SETTLEMENT WITH KATCHIS FAMILY AND FILING OF MOTION TO APPROVE SAME; EMAILS REGARDING WIRE TRANSFER INSTRUCTIONS TO BE ATTACHED TO SETTLEMENT AGREEMENT	0.20	
03/04/24	KLB	REVIEW EMAILS REGARDING AVAILABILITY FOR MEDIATION AND PREPARE NOTICE OF MEDIATION FOR ACTION AGAINST J. ABRAMSON	0.40	
03/04/24	KLB	FINALIZE, FORMAT AND E-FILE NOTICE OF MEDIATION FOR ABRAMSON MEDIATION AND	0.40	

F E E S

Date	Attorney	Description	Hours	
		EMAILS TO MEDIATOR REGARDING SAME AND ZOOM LINK FOR UPCOMING MEDIATION		
03/04/24	KLB	EMAILS REGARDING FILING OF SETTLEMENT MOTION AND FINALIZE FULLY EXECUTED SETTLEMENT AGREEMENT TO INCLUDE ATTACHED WIRE TRANSFER INSTRUCTIONS; EMAILS TO M. NILES AND TO AND FROM D. STERMER REGARDING MOTION TO APPROVE SETTLEMENT	0.30	
03/04/24	KLB	DISCUSSIONS WITH CORPORATE PARALEGAL AND EMAILS TO SAME REGARDING FILING OF ANNUAL RENEWALS FOR GEORGIA PARA LONGEVITY ENTITIES; GATHER BACKUP FOR PAYMENT OF DELAWARE ANNUAL TAXES AND GEORGIA RENEWALS AND EMAILS TO AND FROM D. STERMER; REVIEW 2024 ANNUAL REPORTS RECEIVED [.3 NO CHARGE]	0.00	N/C
03/04/24	MJN	CORRESPOND WITH MEDIATOR AND OPPOSING COUNSEL REGARDING MEDIATIONS.	0.40	
03/04/24	MJN	REVIEW SETTLEMENT MOTION- KATCHIS.	0.30	
03/04/24	MJN	REVIEW NOTICE OF MEDIATION. [.2 NO CHARGE]	0.00	N/C
03/04/24	MJN	CORRESPOND WITH COUNSEL FOR FIFTH AVENUE HEALTHCARE PARTNERS; RESEARCH REGARDING THE SAME; FOLLOW UP WITH COUNSEL.	0.90	
03/04/24	WOD	RECEIPT AND REVIEW OF ANALYSIS FROM DSI OF PAYMENTS TO GREY SWAN.	0.30	
03/05/24	BGR	WORK ON KATCHIS AND 5TH AVENUE ISSUES	0.70	
03/05/24	BGR	WORK ON LITIGATION CLAIM ANALYSIS	0.80	
03/05/24	BGR	FURTHER REVIEW OF CHANGES TO OFR PROTECTIVE ORDER ON DOCUMENTS	0.30	
03/05/24	KLB	FINALIZE AND FORMAT MOTION TO APPROVE SETTLEMENT AND COMPILE EXHIBITS TO SAME; EMAILS TO AND FROM M. NILES REGARDING FILING OF MOTION	0.40	
03/05/24	KLB	E-FILE MOTION TO APPROVE SETTLEMENT WITH KATCHIS FAMILY AND PREPARE FOR SERVICE BY EMAIL UPON SERVICE LIST PARTIES AND COUNSEL TO KATCHIS FAMILY; REVIEW ONLINE SCHEDULING PORTAL FOR AVAILABLE HEARING DATES FOR HEARING TO CONSIDER SETTLEMENT MOTION AND EMAILS TO COUNSEL AND RECEIVER REGARDING AVAILABILITY	0.40	
03/05/24	MJN	FOLLOW UP WITH C. MILLER REGARDING SETTLEMENT; PREPARE CORRESPONDENCE TO S.	0.80	

F E E S

Date	Attorney	Description	Hours	
		ORTH REGARDING FIFTH AVENUE.		
03/05/24	MJN	PREPARE CORRESPONDENCE TO S. ORTH REGARDING FIFTH AVENUE; FOLLOW UP WITH D. STERMER AND B.RICH REGARDING THE SAME.	0.80	
03/05/24	MJN	CORRESPOND WITH D. MAZANEC REGARDING KATCHIS SETTLEMENT; FINALIZE MOTION REGARDING THE SAME.	0.40	
03/06/24	BGR	WORK ON KATCHIS AND 5TH AVENUE ISSUES	1.80	
03/06/24	KLB	REVIEW MULTIPLE EMAILS FROM COUNSEL REGARDING AVAILABILITY FOR MOTION CALENDAR HEARING ON MOTION TO APPROVE SETTLEMENT WITH KATCHIS FAMILY AND PREPARE NOTICE OF HEARING; EMAILS TO S. ORTH REGARDING AVAILABILITY AND EMAILS TO D. STERMER REGARDING SAME	0.40	
03/06/24	KLB	REVISE, FINALIZE, FORMAT AND E-FILE NOTICE OF HEARING ON MOTION TO APPROVE SETTLEMENT WITH KATCHIS FAMILY AND UPLOAD FILED MOTION AND HEARING NOTICE TO ONLINE SCHEDULING PORTAL; PREPARE FOR SERVICE OF NOTICE OF HEARING BY EMAIL TO COUNSEL	0.40	
03/06/24	MJN	REVIEW AND REVISE STIPULATED CONFIDENTIALITY ORDER AND AGREEMENT; CORRESPOND WITH TEAM REGARDING THE SAME. [7 NO CHARGE]	0.00	N/C
03/06/24	MJN	CORRESPOND WITH COUNSEL FOR FIFTH AVENUE REGARDING SETTLEMENT.	0.40	
03/06/24	MJN	REVIEW CORRESPONDENCE AND DOCUMENTS RELATED TO TARGETS COUNSEL	1.30	
03/06/24	MJN	FURTHER REVISE CONFIDENTIALITY ORDER; CORRESPOND WITH OFR REGARDING THE SAME.	0.50	
03/07/24	BGR	CALL WITH CLIENT ON MEDIATION ISSUES AND DEMAND TO 5TH AVE PHYSICIAN	0.90	
03/07/24	BGR	WORK ON CLAIM/LITIGATION ANALYSIS	0.90	
03/07/24	MJN	FOLLOW UP WITH SCOTT ORTH REGARDING FIFTH AVENUE.	0.20	
03/07/24	MJN	REVIEW DOCUMENTS PROVIDED BY ALPHASTAFF; FOLLOW UP WITH T.CARUSO REGARDING THE SAME.	0.40	
03/07/24	MJN	PREPARE CORRESPONDENCE REGARDING ALLEGED CONFLICTS OF INTEREST.	1.00	
03/07/24	WOD	RECEIPT AND REVIEW OF RESPONSE FROM R.SCHINDLER TO DEMAND TO WITHDRAW FROM	0.50	

F E E S

Date	Attorney	Description	Hours	
		CONFLICTED REPRESENTATION AND SEARCH CLOUD9 FOR ALL EMAILS INCLUDING R. SCHINDLER.		
03/07/24	WOD	RECEIPT AND REVIEW OF EMAIL CORRESPONDENCE FROM ALPHASTAFF RE: PAYMENT RECORDS TO ADVISORS.	0.20	
03/08/24	BGR	WORK ON ISSUES RELATED TO 5TH AVENUE PHYSICIANS	0.90	
03/08/24	MJN	CORRESPOND WITH COUNSEL FOR FIFTH AVENUE PHYSICIANS REGARDING SETTLEMENT .	0.40	
03/08/24	MJN	CORRESPOND WITH W.DIAB REGARDING MEDIATIONS UPDATE MEDIATION CHART. .	0.60	
03/08/24	MJN	RESEARCH REGARDING PONZI REPORT.	0.50	
03/08/24	MJN	CONFERENCE CALL WITH DSI AND BERGER SINGERMAN TEAMS TO DISCUSS MEDIATION PIVOT AND STRATEGY.	0.80	
03/08/24	MJN	CORRESPOND WITH S. ORTH REGARDING DEMAND; FOLLOW UP WITH TEAM REGARDING THE SAME.	0.30	
03/08/24	WOD	RESEARCH KNOWLEDGE REQUIREMENTS OF AIDING AND ABETTING BREACH OF FIDUCIARY DUTIES AND FRAUD CLAIMS.	1.00	
03/11/24	BGR	ATTEND LITIGATION STRATEGY CALL	1.20	
03/11/24	BGR	ATTEND TO 5TH AVENUE SETTLEMENT ISSUES AND OWNERSHIP OF STOCK	0.80	
03/11/24	BGR	EMAILS ON GM CONFLICT ISSUES	0.40	
03/11/24	GCG	CONFIDENTIAL CLIENT VIDEO CONFERENCE REGARDING LITIGATION STRATEGY (.5); FOLLOW UP REGARDING DRAFTING COMPLAINT (.2); ATTENTION TO NUMEROUS EMAILS FROM T. CARUSO (.3); FOLLOW UP REGARDING INSURANCE PAYMENT ISSUES TO/FROM G. WOODFIELD (.2)	1.20	
03/11/24	MJN	CORRESPOND WITH W. DIAB REGARDING MEDIATION STATEMENTS. [.3 NO CHARGE]	0.00	N/C
03/11/24	MJN	CORRESPOND WITH COUNSEL FOR FIFTH AVENUE PHYSICIANS REGARDING SETTLEMENT; FOLLOW UP WITH S. ORTH REGARDING THE SAME.	0.50	
03/11/24	MJN	ATTEND CONFERENCE CALL WITH TEAM TO DISCUSS STRATEGY GOING FORWARD [.8 NO CHARGE]	0.00	N/C
03/11/24	WOD	EXCHANGE CORRESPONDENCE WITH P. HICKS RE: ANALYSIS OF ADVISORS DONOFF, ██████████ PALUZZI, AND ██████████ FOR UPCOMING MEDIATION. [.2 NO CHARGE]	0.00	N/C

F E E S

<u>Date</u>	<u>Attorney</u>	<u>Description</u>	<u>Hours</u>
03/11/24	WOD	STRATEGY MEETING WITH LITIGATION TEAM AND CLIENT TO DISCUSS MEDIATION STRATEGY AND ADDITIONAL CLAIMS AGAINST BANKS.	1.00
03/11/24	WOD	ANALYZE R. SCHINDLER COMMUNICATIONS WITH RECEIVERSHIP ENTITIES AND PREPARE CORRESPONDENCE TO CLIENT RE: CONFLICT OF INTEREST.	0.50
03/11/24	PH	REVIEW DOCUMENTS AND CONDUCT IN CLOUD9 RELATING TO DONOFF	1.60
03/12/24	BGR	MULTIPLE CALLS AND REVIEW DOCUMENTS AND LITIGATION CLAIM ISSUES/STRATEGY ON BANK CLAIMS	2.50
03/12/24	KLB	ATTEND STRATEGY CALL WITH G. GAUKROGER, B. RICH AND W. DIAB TO DISCUSS LITIGATION, DOCUMENT REVIEW, ETC.; FOLLOW UP DISCUSSIONS WITH W. DIAB	0.50
03/12/24	KLB	PREPARE SECOND RENOTICES OF MEDIATION CONFERENCE FOR TEPPER, DICEMBRINO AND EMMETS MEDIATIONS, AND EMAILS TO B. RICH; FINALIZE, FORMAT AND E-FILE THREE SECOND RENOTICES OF MEDIATION, AND EMAILS TO R. KOBERT, MEDIATOR	0.80
03/12/24	KLB	PREPARE INITIAL DRAFT OF TOLLING AGREEMENT AND EMAILS TO AND FROM G. GAUKROGER REGARDING SAME; EMAILS TO DSI TEAM FOR REVIEW AND COMMENTS	1.20
03/12/24	GCG	STRATEGY DISCUSSIONS WITH B. RICH (.2); EMAILS TO/FROM D. STERMER (.3); ANALYZE DOCUMENTS FROM D. STERMER (.8)	1.30
03/12/24	WOD	RECEIPT AND REVIEW OF SEVERAL CORRESPONDENCES FROM CLIENT FORWARDING EVIDENCE OF NOTE SCHEME FOR SUPPORT OF ADVISOR CLAIMS AND BANK CLAIMS.	0.50
03/13/24	BGR	ATTEND TO ██████████ SETTLEMENT ISSUES	0.50
03/13/24	BGR	ATTEND TO POTENTIAL CONFLICT ISSUES	0.60
03/13/24	KLB	REVIEW RECEIVERSHIP ORDER AND DISCUSSIONS WITH B. RICH AND D. STERMER REGARDING FILING OF ACTIONS AGAINST THIRD PARTIES; EMAILS TO AND FROM G. GAUKROGER REGARDING DEADLINE FOR FILING OF ACTIONS	0.20
03/13/24	KLB	EMAILS REGARDING FNBCC PRODUCTION AND REVIEW OF DOCUMENTS	0.20
03/13/24	KLB	INITIAL REVIEW OF DOCUMENTS PRODUCED BY	1.30

F E E S

Date	Attorney	Description	Hours	
		FNBBB AND REVIEW EMAILS FROM D. STERMER REGARDING DOCUMENTS PRODUCED BY U.S. BANK		
03/13/24	GCG	ANALYZE CONFLICT OF ISSUE RULES AND DRAFT EMAIL MEMO REGARDING SAME	0.80	
03/13/24	WOD	RECEIPT AND REVIEW OF MEMO ON CONFLICT OF INTEREST OF R. SCHINDLER FROM G. GAUKROGER.	0.20	
03/14/24	BGR	REVIEW ██████████ PROPOSED AGREEMENT [.6 NO CHARGE]	0.00	N/C
03/14/24	BGR	ADDITIONAL LITIGATION ANALYSLS	0.90	
03/14/24	KLB	REVIEW EMAIL REGARDING POTENTIAL SETTLEMENT WITH ██████████ AND INITIAL PREPARATION OF DRAFT SETTLEMENT AGREEMENT (1.1); EMAILS TO AND FROM G. GAUKROGER REGARDING SAME (0.1)	1.20	
03/14/24	KLB	REVIEW ALL DOCUMENTS PRODUCED BY FNBBB, AND, SPECIFICALLY, EMAILS AND COMMUNICATIONS (1.4); PREPARE SPREADSHEET OF DOCUMENTS RECEIVED AND EMAILS TO B. RICH AND G. GAUKROGER REGARDING FINDINGS (2.1)	3.50	
03/14/24	KLB	EMAILS REGARDING REVIEW OF US BANK DOCUMENTS AND EMAILS REGARDING PREPARATION OF INITIAL DRAFT OF COMPLAINT AGAINST WELLS FARGO BANK	0.20	
03/14/24	GCG	REVISE DRAFT SETTLEMENT AGREEMENT WITH ██████████	0.60	
03/15/24	BGR	PREPARE FOR AND ATTEND CALL ON LANDLORD ISSUES	0.80	
03/15/24	BGR	ATTEND TO ISSUES RELATED TO VANTAGE	0.80	
03/15/24	BGR	WORK ON LITIGATION CLAIM ANALYSIS ISSUES	0.90	
03/15/24	KLB	REVIEW EMAIL FROM D. STERMER REGARDING REVIEW OF DOCUMENTS PROVIDED BY US BANK AND REVIEW DOCUMENTS PRODUCED; EMAILS TO D. STERMER REGARDING LACK OF COMMUNICATIONS IN DOCUMENTS PRODUCED	0.40	
03/16/24	BGR	WORK ON LITIGATION/CLAIM ANALYSIS/MEDIATION PREPARATION ISSUES	1.80	
03/17/24	BGR	MEDIATION PREPARATION/LITIGATION ANALYSIS ISSUES	0.90	
03/17/24	MJN	REVIEW MOTION TO DISMISS; CORRESPOND WITH B.RICH REGARDING HEARING.	0.40	
03/18/24	BGR	ATTEND TO MEDIATION AND POTENTIAL GM	0.90	

F E E S

Date	Attorney	Description	Hours	
		CONFLICT ISSUES; DRAFT RESPONSE		
03/18/24	BGR	WORK ON ANALYSIS OF LL CLAIMS	0.70	
03/18/24	MJN	PREPARE FOR AND ATTEND HEARING IN PARALONGEVITY MATTER.	0.80	
03/18/24	MJN	CORRESPOND WITH C. MILLER REGARDING SETTLEMENT WITH FIFTH AVENUE PHYSICIANS. PHONE CONFERENCE REGARDING THE SAME.	0.40	
03/18/24	MJN	REVIEW EMAILS AND CORRESPONDENCE REGARDING R. SCHINDLER; FOLLOW UP PHONE CONFERENCE WITH T. CARRIULO REGARDING THE SAME.	1.40	
03/18/24	MJN	REVIEW MEMO REGARDING DISQUALIFICATION.	0.50	
03/18/24	WOD	INTEROFFICE CALLS WITH COUNSEL TO DISCUSS R. SCHINDLER CONFLICT OF INTEREST AND POTENTIAL MOTION TO DISQUALIFY. [.5 NO CHARGE]	0.00	N/C
03/18/24	WOD	REVIEW RECEIVERSHIP ENTITY DOCUMENTS IN CLOUD9 FOR EVIDENCE ON ADVISORS DUNOFF, PALUZZI, [REDACTED] AND [REDACTED] PARTICIPATION IN PROMISSORY NOTE SALES IN ORDER TO PREPARE MEDIATION STATEMENTS.	1.80	
03/19/24	BGR	PREPARATION FOR AND ATTEND CALL WITH B. CAROLLO ON PACKARD AND LUCENKO ISSUES	0.60	
03/19/24	BGR	WORK ON MEDIATION/LITIGATION RELATED ISSUES; REVIEW EMAILS AND MULTIPLE DOCS TO SUPPORT CLAIMS	1.80	
03/19/24	BGR	ATTEND TO GM AND POTENTIAL CONFLICT ISSUES AND INTERIM RESOLUTION	0.90	
03/19/24	MJN	PREPARE CORRESPONDENCE TO R. SCHINDLER REGARDING CONFLICT OF INTEREST CONCERNS;	0.40	
03/19/24	MJN	CORRESPOND WITH S. ORTH REGARDING RECEIVERSHIP RECORDS; FOLLOW UP INTERNALLY REGARDING THE SAME.	0.30	
03/19/24	MJN	REVIEW AND REVISE [REDACTED] SETTLEMENT AGREEMENT; CORRESPOND WITH TEAM REGARDING THE SAME.	0.60	
03/19/24	MJN	CORRESPOND WITH B. CAROLLO REGARDING LITIGATION; FOLLOW UP CORRESPONDENCE REGARDING APPELLEE ISSUE.	0.90	
03/19/24	WOD	REVIEW RECEIVERSHIP ENTITY DOCUMENTS IN CLOUD9 FOR EVIDENCE ON ADVISORS DUNOFF, PALUZZI, [REDACTED] AND [REDACTED] PARTICIPATION	4.50	

F E E S

Date	Attorney	Description	Hours	
		IN PROMISSORY NOTE SALES IN ORDER TO PREPARE MEDIATION STATEMENTS.		
03/19/24	WOD	COMMENCE DRAFTING MEDIATION STATEMENT FOR ADVISORS DONOFF, PALUZZI, ██████████, AND ██████████	2.80	
03/20/24	BGR	MEDIATION PREPARATION	0.90	
03/20/24	BGR	REVIEW 11TH CIRCUIT OPINION AND ANALYSIS FOR FACTS IN THIS CASE TO FILE AIDING AND ABETTING/TORT CLAIMS	0.90	
03/20/24	BGR	REVIEW MEDIATION STATEMENTS	0.90	
03/20/24	KLB	REVIEW EMAIL FROM G. GAUKROGER AND PREPARE CHART OF UPCOMING MEDIATIONS; EMAILS REGARDING SAME AND DISCUSSIONS WITH M. NILES REGARDING STATUS OF MEDIATION STATEMENTS [1.3 NO CHARGE]	0.00	N/C
03/20/24	KLB	EMAILS TO THREE MEDIATORS REGARDING ZOOM INFORMATION FOR UPCOMING MEDIATIONS AND UPDATE MEDIATION CHART; DISCUSSIONS WITH M. NILES REGARDING UPCOMING MEDIATIONS	0.50	
03/20/24	MJN	RESEARCH REGARDING PONZI ALLEGATIONS AND STANDING OF RECEIVER.	1.00	
03/20/24	MJN	CORRESPOND WITH B. CAROLLO REGARDING LUCENKO MATTER.	0.30	
03/20/24	MJN	DISCUSS RECOVERY OF CERTAIN DOCUMENTS FROM S.ORTH'S OFFICE.	0.40	
03/20/24	MJN	CORRESPOND WITH R. PEARCE REGARDING ██████████ SETTLEMENT.	0.40	
03/20/24	MJN	DISCUSSIONS REGARDING MEDIATION ON 3/26; FOLLOW UP REGARDING THE SAME. [.5 NO CHARGE]	0.00	N/C
03/20/24	MJN	REVIEW ADDITIONAL EMAILS PROVIDED BY D. STERMER.	0.40	
03/20/24	WOD	REVIEW RECEIVERSHIP ENTITY DOCUMENTS IN CLOUD9 FOR EVIDENCE ON ADVISORS DUNOFF, PALUZZI, ██████████ AND ██████████ PARTICIPATION IN PROMISSORY NOTE SALES IN ORDER TO PREPARE MEDIATION STATEMENTS.	2.80	
03/20/24	WOD	CONTINUE DRAFTING MEDIATION STATEMENT ON ADVISORS DONOFF, PALUZZI, ██████████ AND ██████████	5.00	
03/20/24	WOD	DRAFT FURTHER ANALYSIS OF R. SCHINDLER CONFLICT BASED ON EMAILS FOUND IN CLOUD9.	0.40	

F E E S

Date	Attorney	Description	Hours	
03/21/24	BGR	REVIEW UPDATED MEDIATION STATEMENTS	0.90	
03/21/24	BGR	LITIGATION ANALYSIS WORK AND MEDIATION STATEMENT/DRAFT COMPLAINT ISSUES	1.70	
03/21/24	KLB	REVIEW EMAIL FROM MEDIATOR REGARDING ZOOM INFORMATION FOR UPCOMING MEDIATION WITH J. ABRAMSON AND UPDATE MEDIATION CHART; REVIEW EMAIL FROM MEDIATOR, P. KING	0.40	
03/21/24	PA	REVIEW MEDIATION MEMO, PLEADINGS, MEMOS TO/FROM MIKE NILES AND DRAFT COMPLAINT DIRECTED TO DEFENDANTS DUNOFF, PALUZZI, [REDACTED] AND [REDACTED] FOR MEDIATION PURPOSES	4.40	
03/21/24	GCG	REVIEW/RESPOND TO MEDIATION PREPARATION EMAILS (.2); ATTENTION TO MEDIATION STATEMENT DRAFT AND REVISIONS (.2)	0.40	
03/21/24	MJN	REVIEW AND REVISE MEDIATION STATEMENT AND EXHIBITS' CORRESPOND WITH W. DIAB AND TEAM REGARDING THE SAME.	1.00	
03/21/24	MJN	CORRESPOND WITH R. SCHINDLER REGARDING MEDIATIONS.	0.30	
03/21/24	MJN	REVIEW REVISIONS TO SETTLEMENT AGREEMENT WITH [REDACTED] FOLLOW UP WITH COUNSEL REGARDING THE SAME.	0.40	
03/21/24	MJN	CORRESPOND WITH P.AVRON REGARDING DRAFT COMPLAINTS FOR MEDIATION; PROVIDE REQUESTED INFORMATION; REVIEW DRAFT COMPLAINTS.	0.80	
03/21/24	WOD	RECEIPT AND REVIEW OF COMMENTS TO MEDIATION STATEMENT FOR DONOFF, PALUZZI, [REDACTED] AND [REDACTED] FROM LITIGATION TEAM, INCORPORATE COMMENTS, PREPARE EXHIBITS AND SEND TO CLIENT.	1.00	
03/21/24	WOD	RECEIPT AND REVIEW OF COMMENTS AND REVISIONS TO MEDIATION STATEMENT FOR DONOFF, PALUZZI, [REDACTED] AND [REDACTED] FROM CLIENT AND FINALIZE FOR DELIVERY TO MEDIATOR.	0.50	
03/22/24	BGR	MEDIATION PREPARATION	1.20	
03/22/24	GCG	CONFIDENTIAL STRATEGY CONFERENCE WITH POTENTIAL CLASS COUNSEL, FURTHER DISCUSSION WITH RECEIVER AND RECEIVER TEAM AND FOLLOW UP REGARDING MEDIATION PLANNING (2); FURTHER REVIEW AND ANALYSIS OF NUMEROUS EMAILS FROM RECEIVER STERMER IN ADVANCE OF MEDIATION PREPARATIONS (.5)	2.50	
03/22/24	MJN	ATTEND CONFERENCE CALL WITH TEAM AND OTHER	0.00	N/C

F E E S

Date	Attorney	Description	Hours	
		COUNSEL TO DISCUSS ADDITIONAL LITIGATION, MEDIATIONS, AND SETTLEMENTS. [2.0 NO CHARGE]		
03/22/24	MJN	CORRESPOND WITH W. DIAB REGARDING MEDIATION STATEMENT; REVIEW AND FINALIZE EXHIBITS. [.6 NO CHARGE]	0.00	N/C
03/22/24	MJN	CORRESPOND WITH MEDIATOR REGARDING MEDIATION STATEMENT.	0.20	
03/22/24	MJN	CORRESPOND WITH J. PERLMAN REGARDING ██████████	0.30	
03/22/24	MJN	REVIEW VARIOUS EMAILS REGARDING MEDIATION TARGETS; FOLLOW UP REGARDING THE SAME.	0.60	
03/22/24	WOD	FINALIZE MEDIATION STATEMENT AND DELIVER TO MEDIATOR AND OPPOSING COUNSEL.	0.60	
03/22/24	WOD	RECEIPT AND REVIEW OF EXTENSIVE COMMUNICATIONS RE: ADVISOR SALE OF NOTES DELIVERED BY CLIENT FROM INVESTIGATION IN CLOUD9 DATABASE.	1.00	
03/25/24	BGR	MEDIATION PREPARATION/WORK ON REVISED DRAFT COMPLAINT	2.50	
03/25/24	BGR	PREPARE FOR ATTEND AND FOLLOW-UP ON CALL WITH OFR AND PSTC	1.00	
03/25/24	BGR	CALL WITH AH ON LITIGATION CLAIMS	0.80	
03/25/24	KLB	GATHER DEMAND LETTERS, MEDIATION STATEMENTS AND EXHIBITS AND PREPARE E-BINDER FOR MARCH 26, 2024, MEDIATIONS; EMAILS TO TEAM AND TO D. STERMER REGARDING SAME	1.10	
03/25/24	GCG	PREPARE FOR (.2) AND PARTICIPATE IN PRE-MEDIATION CONFERENCE WITH K. APPELBY, D. STERMER, M. NILES, AND B. RICH (.5) AND WORK ON DRAFT COMPLAINT (2X) AGAINST SH AGENTS AND RELATED RESEARCH AND EMAIL MEMO TO TEAM (1.2); REVIEW AND ANALYZE MEDIATION STATEMENT FROM R. SCHINDLER AND RELATED CLIENT EMAILS (.3)	2.20	
03/25/24	GCG	CONFERENCE WITH AH (1.3); FOLLOW UP WITH DSI/STERMER TEAM (.3)	1.60	
03/25/24	MJN	CORRESPOND WITH J. PERLMAN REGARDING ██████████ RESEARCH REGARDING THE SAME.	0.40	
03/25/24	MJN	CORRESPOND WITH S. ORTH REGARDING DOCUMENTS HE IS IN POSSESSION OF.	0.30	
03/25/24	MJN	FURTHER REVISE FRAUDULENT TRANSFER/AIDDING	0.60	

F E E S

Date	Attorney	Description	Hours	
		AND ABETTING COMPLAINT.		
03/25/24	MJN	CORRESPOND WITH AH REGARDING SH ENTERPRISE.	1.80	
03/25/24	MJN	WORK ON AMENDED COMPLAINT FOR ADVISORS; CORRESPOND WITH G. GAUKROGER AND D. STERMER REGARDING THE SAME.	2.00	
03/25/24	MJN	PREPARE FOR MEDIATIONS ON 3/26; REVIEW MEDIATION STATEMENT.	2.50	
03/25/24	WOD	ANALYZE DONOFF, PALUZZI, AND ██████████ MEDIATION STATEMENT.	0.60	
03/25/24	WOD	ATTEND CONFERENCE CALL WITH AH TO DISCUSS HIS ROLE IN THE RECEIVERSHIP ENTITIES (1.0)	1.00	
03/26/24	BGR	PREPARE FOR AND ATTEND 3 MEDIATIONS AND WORK THROUGH SETTLEMENT DOCUMENTS	5.50	
03/26/24	BGR	PREPARE FOR AND ATTEND CALL WITH OFR	0.60	
03/26/24	BGR	PREPARE FOR AND ATTEND CALL WITH C. SCHOEPPL	0.30	
03/26/24	GCG	MEDIATION WITH PALUZZI, DONOFF, AND ██████████ IN BOCA RATON OFFICES OF GREENSPOON MARDER WITH D. STERMER AND LITIGATION TEAM	9.00	
03/26/24	MJN	ATTEND MEDIATION, RESEARCH REGARDING DEFENDANT'S ABILITY TO PAY; PREPARE SETTLEMENT AGREEMENT; REVISE AND FINALIZE AGREEMENTS. [8.0 NO CHARGE]	0.00	N/C
03/26/24	MJN	CORRESPOND WITH FIFTH AVENUE PHYSICIANS COUNSEL.	0.20	
03/26/24	MJN	CORRESPOND WITH R. PEARCE REGARDING ██████████ SETTLEMENT.	0.30	
03/26/24	WOD	ATTEND MEDIATION WITH DONOFF, PALUZZI, AND ██████████ AND PREPARE SETTLEMENT AGREEMENTS WITH DONOFF AND ██████████ [8.0 NO CHARGE]	0.00	N/C
03/27/24	BGR	FOLLOW-UP ON POST MEDIATION ISSUES AND NEXT STEPS FOR SETTLEMENTS	0.80	
03/27/24	BGR	FOLLOW-UP ON PELICAN DEMAND AND RESPONSE	0.40	
03/27/24	BGR	CALL WITH W. DIAB ON UPCOMING HEARING [.8 NO CHARGE]	0.00	N/C
03/27/24	BGR	WORK ON CLAIM REVIEW FOR HEARING PREPARATION	0.70	
03/27/24	GCG	REVIEW AND DRAFT EMAIL TO COUNSEL FOR PELICAN REGARDING STATUS OF SETTLEMENT NEGOTIATIONS AND RELATED COMMUNICATIONS	1.30	

F E E S

Date	Attorney	Description	Hours	
		WITH B. RICH AND CLIENT TEAM (.8); FOLLOW UP ON MEDIATION RELATED ISSUES INCLUDING REQUEST TO CHANGE TERMS BY R. DONOFF (.3); FINALIZE AND SEND DEMAND EMAIL TO PELICAN COUNSEL (.2)		
03/27/24	MJN	RESEARCH REGARDING "RIGHT OF RECISSION" IN FLORIDA MEDIATION AGREEMENTS; FOLLOW UP WITH TEAM REGARDING THE SAME.	0.40	
03/27/24	MJN	CORRESPOND WITH R. PEARCE REGARDING STIPULATION RE: ANSWER.	0.20	
03/27/24	MJN	CORRESPOND WITH T. CARUSO REGARDING ADDITIONAL TARGETS; REVIEW DOCUMENTS AND PRIOR RESEARCH REGARDING THE SAME.	1.20	
03/27/24	MJN	PREPARE FOR ADDITIONAL MEDIATIONS IN APRIL.	0.60	
03/28/24	BGR	ATTEND TO MEDIATION FOLLOWUP ISSUES ON SETTLEMENTS	0.90	
03/28/24	BGR	PREPARE FOR AND ATTEND TO ████████ CALL	0.90	
03/28/24	BGR	WORK ON ANALYSIS OF CLAIMS AGAINST BANKS	1.20	
03/28/24	GCG	ATTENTION TO MEDIATION FOLLOW UP ISSUES AND ANALYSIS	0.40	
03/28/24	MJN	CORRESPOND WITH FIFTH AVENUE PHYSICIANS COUNSEL; RESEARCH AND FOLLOW UP REGARDING THE SAME.	0.40	
03/28/24	MJN	PREPARE FOR AND ATTEND CALL REGARDING ████████ ████████ FOLLOW UP RESEARCH REGARDING THE SAME. CORRESPOND WITH D. STERMER.	1.40	
03/28/24	MJN	CORRESPOND WITH TEAM REGARDING ADDITIONAL LITIGATION [.7 NO CHARGE]	0.00	N/C
03/29/24	BGR	CALL WITH FNBCC COUNSEL ON TOLLING AGREEMENT	0.40	
03/29/24	BGR	FOLLOW-UP ON MEDIATIONS THAT OCCURRED [.6 NO CHARGE]	0.00	N/C
03/29/24	BGR	REVIEW MEDIATION STATEMENTS FOR NEXT MEDIATIONS	0.70	
03/29/24	GCG	REVIEW AND ANALYZE RESPONSE TO DEMAND TO PELICAN	0.20	
03/29/24	GCG	REVIEW AND ANALYZE ISSUES REGARDING ADDITIONAL DEMAND LETTERS (.2)	0.20	
03/29/24	MJN	REVIEW MEDIATION STATEMENTS AND OTHER EMAILS PROVIDED BY D. STERMER	1.40	

F E E S

Date	Attorney	Description	Hours	
03/29/24	MJN	CORRESPOND WITH ██████████ FOLLOW UP REGARDING THE SAME.	0.30	
03/29/24	MJN	WORK ON ADDITIONAL DEMAND LETTERS.	0.50	
03/29/24	MJN	REVIEW MOTION TO EXTEND TIME TO ANSWER AND ORDER; FOLLOW UP WITH G. GAUKROGER	0.30	
03/29/24	MJN	PREPARE TOLLING AGREEMENT WITH FNBCC; RESEARCH REGARDING THE SAME.	0.70	
03/29/24	MJN	CORRESPOND WITH D. STERMER AND T. CARUSO REGARDING ADDITIONAL DEMAND LETTERS. REVIEW SPREADSHEETS PROVIDED.	0.40	
04/01/24	BGR	MEDIATION PREPARATION ISSUES	1.80	
04/01/24	BGR	WORK ON CLAIM ANALYSIS	1.20	
04/01/24	KLB	EMAILS TO TEAM REGARDING ATTENDANCE AT HEARING ON APRIL 2, 2024, TO CONSIDER EZRINE'S MOTION TO DISMISS, AND HEARING ON APRIL 3, 2024, ON MOTION TO APPROVE SETTLEMENT WITH KATCHIS FAMILY (.1); DISCUSSIONS WITH M. NILES REGARDING ATTENDANCE AT HEARINGS (.1) [2 NO CHARGE]	0.00	N/C
04/01/24	MJN	REVIEW MOTION TO EXTEND TIME TO ANSWER AND REVISE; CORRESPOND WITH G.GAUKROGER REGARDING THE SAME. [3 NO CHARGE]	0.00	N/C
04/01/24	MJN	CORRESPOND WITH TEAM REGARDING ADDITIONAL DEMAND LETTERS.	0.40	
04/02/24	BGR	PREPARE FOR HEARING	0.50	
04/02/24	BGR	MEDIATION PREPARATION AND FOLLOW-UP ISSUES	1.30	
04/02/24	KLB	REVIEW EMAIL FROM AND EMAILS TO RECEIVER REGARDING REGISTERED AGENT RESIGNATIONS FOR VARIOUS ENTITIES AND UPDATE CORPORATE CHART	0.30	
04/02/24	KLB	FINALIZE, FORMAT AND SUBMIT PROPOSED ORDER APPROVING SETTLEMENT WITH KATCHIS FAMILY AND GATHER PLEADINGS FOR UPCOMING HEARING (.4); PREPARE E-BINDER FOR APRIL 3, 2024, HEARING ON MOTION TO APPROVE SETTLEMENT WITH KATCHIS FAMILY, EMAILS TO TEAM (.4)	0.80	
04/02/24	KLB	INITIAL PREPARATION OF MOTION TO APPROVE SETTLEMENT WITH R. DONOFF AND PREPARE PROPOSED ORDER APPROVING SETTLEMENT AGREEMENT (1.3); REDACT FINANCIAL INFORMATION IN AGREEMENT AND EXHIBIT AND EMAILS TO B. RICH AND M. NILES (0.4)	1.70	

F E E S

Date	Attorney	Description	Hours	
04/02/24	KLB	PREPARE MOTION TO APPROVE SETTLEMENT WITH ██████████ AND PREPARE PROPOSED ORDER GRANTING SAME (1.1); GATHER EXHIBITS TO SETTLEMENT AGREEMENT AND REDACT FINANCIAL INFORMATION FROM AGREEMENT AND EXHIBIT (.2); EMAILS TO B. RICH AND M. NILES (.1)	1.40	
04/02/24	GCG	ATTEND MOTION TO DISMISS HEARING AND FOLLOW UP WITH D. STERMER REGARDING SAME	0.60	
04/02/24	MJN	REVIEW AND REVISE SETTLEMENT MOTIONS; RESEARCH REGARDING MOTIONS TO SEAL AND REDACT.	0.80	
04/02/24	MJN	REVIEW AND REVISE SETTLEMENT AGREEMENTS FOR EMMETS, DICEMBRINO, AND TEPPER (0.4); FOLLOW UP RESEARCH REGARDING THE SAME (0.6). CORRESPOND WITH W. DIAB REGARDING THE SAME (0.1).	1.20	
04/02/24	MJN	REVIEW AND REVISE DEMAND LETTERS FOR ADDITIONAL TARGETS;	1.20	
04/02/24	WOD	ANALYZE AND INVESTIGATE DOCUMENTS IN CLOUD9 TO FIND EVIDENCE OF NOTE SALES AND COMMISSIONS BY JEFF ABRAMSON IN ANTICIPATION OF MEDIATION.	2.80	
04/03/24	BGR	PREPARE FOR AND ATTEND HEARING ON KATCHIS SETTLEMENT	0.80	
04/03/24	KLB	DISCUSSIONS WITH M. NILES REGARDING FILING OF UNREDACTED SETTLEMENT AGREEMENTS UNDER SEAL (.2); INITIAL PREPARATION OF MOTION TO FILE UNREDACTED SETTLEMENT AGREEMENTS UNDER SEAL (.8); REVIEW RULE 2.420 AND REVISE MOTION AND PREPARE PROPOSED ORDER (.8); PREPARE NOTICES OF CONFIDENTIAL INFORMATION AND EMAILS TO M. NILES (.6)	2.40	
04/03/24	MJN	CORRESPOND WITH W. DIAB REGARDING MEDIATIONS. FURTHER REVIEW MEDIATION STATEMENTS [.6 NO CHARGE]	0.00	N/C
04/03/24	MJN	REVIEW MEDIATION STATEMENT FOR J. ABRAMSON AND EXHIBITS; RESEARCH REGARDING THE SAME.	0.70	
04/03/24	MJN	REVIEW AND REVISE NOTICE OF CONFIDENTIAL INFORMATION FOR SETTLEMENT AGREEMENTS; REVIEW AND REVISE MOTION TO FILE UNREDACTED VERSIONS WITH THE COURT.	0.50	
04/03/24	WOD	INVESTIGATE ADVISOR JEFF ABRAMSON'S FURTHERANCE OF PONZI SCHEME BY ANALYZING COMMUNICATIONS OF SH ENTERPRISE IN CLOUD 9.	3.50	

F E E S

<u>Date</u>	<u>Attorney</u>	<u>Description</u>	<u>Hours</u>	
04/03/24	WOD	DRAFT MEDIATION STATEMENT FOR MEDIATION WITH JEFF ABRAMSON.	4.20	
04/03/24	WOD	REVISE AND UPDATE MEDIATION STATEMENTS FOR MEDIATIONS WITH A. DICEMBRINO,, D. TEPPER, AND D. EMMETS TO INCLUDE NEW FACTS AND INFORMATION. [1.5 NO CHARGE]	0.00	N/C
04/04/24	KLB	DISCUSSIONS WITH M. NILES REGARDING UPCOMING MEDIATIONS, SUBMISSION OF MEDIATION STATEMENTS, ETC.	0.10	
04/04/24	KLB	REVIEW EMAIL REGARDING ADDITIONAL DEMAND LETTERS AND PREPARE TEN FRAUDULENT TRANSFER DEMAND LETTERS TO FORMER SH AGENTS (1.3); EMAILS REGARDING EXHIBITS AND ORGANIZE TRANSFER SCHEDULES FOR EACH (0.8)	2.10	
04/04/24	KLB	ORGANIZE EXHIBITS TO DEMAND LETTERS AND FORMAT SAME	0.60	
04/04/24	KLB	REVIEW EMAILS FROM T. CARUSO WITH EXHIBITS TO DEMAND LETTERS TO SH AGENTS AND BEGIN PREPARING SAME	0.30	
04/04/24	MJN	CORRESPOND WITH ██████████ REGARDING SETTLEMENT AGREEMENT. REQUEST REVISED AGREEMENT.	0.30	
04/04/24	MJN	REVIEW REVISIONS TO DEMAND LETTERS; FOLLOW UP WITH T.CARUSO REGARDING EXHIBITS AND ADDRESSES; REVIEW EXHIBITS.	0.60	
04/04/24	MJN	FOLLOW UP WITH T. CARUSO REGARDING DEMAND LETTERS AND AGENT REPORT.	0.60	
04/04/24	MJN	REVIEW UPDATED EXHIBITS.	0.40	
04/04/24	MJN	REVIEW AND REVISE MEDIATION STATEMENTS; FOLLOW UP WITH W. DIAB REGARDING THE SAME. [.9 NO CHARGE]	0.00	N/C
04/04/24	WOD	RECEIVE AND INCORPORATE FINAL CHANGES TO MEDIATION STATEMENTS FOR ABRAMSON, DICEMBRINO, TEPPER, AND EMMETS, PROOF AND FINALIZE, PREPARE EXHIBITS, AND DELIVER TO MEDIATORS.	3.80	
04/05/24	BGR	MEDIATION PREPARATION	1.50	
04/05/24	KLB	GATHER DOCUMENTS FOR J. ABRAMSON MEDIATION AND ORGANIZE MEDIATION STATEMENT AND EXHIBITS (0.5); PREPARE E-BINDER FOR MEDIATION AND EMAILS TO TEAM (0.8)	1.30	
04/05/24	KLB	ORGANIZE EXHIBITS RECEIVED FROM T. CARUSO TO	0.50	

F E E S

Date	Attorney	Description	Hours	
		FRAUDULENT TRANSFER DEMAND LETTERS TO SH AGENTS AND FORMAT SAME		
04/05/24	MJN	CORRESPOND WITH TEAM REGARDING UPCOMING MEDIATIONS.	0.40	
04/06/24	BGR	ATTEND TO MEDIATION RELATED ISSUES	0.80	
04/07/24	MJN	PREPARE FOR MEDIATION WITH J. ABRAMSON; RESEARCH REGARDING FINANCIAL WHEREWITHAL.	1.20	
04/08/24	BGR	ATTEND ABRAMSON MEDIATION [3.5 NO CHARGE]	0.00	N/C
04/08/24	KLB	GATHER DOCUMENTS FOR UPCOMING MEDIATIONS ON APRIL 10, 2024, AND INITIAL PREPARATION OF E-BINDER FOR TEPPER, DICEMBRINO, AND EMMETS MEDIATIONS	0.80	
04/08/24	KLB	EMAILS TO AND FROM M. NILES REGARDING FINALIZING SH AGENT FRAUDULENT TRANSFER DEMAND LETTERS [.2 NO CHARGE]	0.00	N/C
04/08/24	GCG	ATTEND MEDIATION WITH J. ABRAMSON [4.0 NO CHARGE]	0.00	N/C
04/08/24	GCG	CLIENT EMAILS REGARDING PELICAN ISSUES	0.20	
04/08/24	MJN	PREPARE FOR MEDIATION AND ATTEND MEDIATION; RESEARCH REGARDING FINANCIAL INFORMATION; PREPARE DRAFT SETTLEMENT AGREEMENT.	4.40	
04/08/24	MJN	REVIEW PROPOSED MOTION/ORDER REGARDING ADMINISTRATIVELY CLOSING THE CASE.	0.30	
04/08/24	MJN	CORRESPOND WITH R. SCHINDLER REGARDING B. WILLIAMS. RESEARCH REGARDING THE SAME.	0.40	
04/08/24	MJN	CORRESPOND WITH C.MILLER REGARDING FIFTH AVENUE.	0.20	
04/08/24	WOD	ATTEND DEPOSITION OF JEFF ABRAMSON (NOT ALL TIME BILLED).	1.00	
04/09/24	BGR	MEDIATION PREPARATION ISSUES	2.70	
04/09/24	BGR	ATTEND TEAM CALL [.6 NO CHARGE]	0.00	N/C
04/09/24	KLB	CONTINUED PREPARATION OF E-BINDER FOR APRIL 10, 2024, MEDIATIONS AND FORMAT VARIOUS MEDIATION STATEMENT EXHIBITS FOR E-BINDER, AND CIRCULATE TO TEAM	1.10	
04/09/24	KLB	REVISE DEMAND LETTERS AND COMPILE EXHIBITS TO SAME (.6); FORMAT TEN FRAUDULENT TRANSFER DEMAND LETTERS AND EMAILS TO M. NILES (.5)	1.10	

F E E S

Date	Attorney	Description	Hours	
04/09/24	KLB	FINALIZE AND PREPARE FOR SERVICE BY FIRST CLASS AND CERTIFIED MAIL OF TEN FRAUDULENT TRANSFER DEMAND LETTERS AND UPDATE MASTER WORK IN PROCESS CHART; EMAILS TO M. NILES	0.80	
04/09/24	MJN	CORRESPOND WITH M. FERRO REGARDING SETTLEMENT PAYMENT.	0.20	
04/09/24	MJN	CORRESPOND WITH R. SCHINDLER REGARDING [REDACTED]	0.30	
04/09/24	MJN	FINALIZE DEMAND LETTERS; CORRESPOND WITH D. STERMER REGARDING THE SAME.	0.50	
04/09/24	MJN	CONFERENCE CALL WITH DSI AND BSLLP TEAM TO DISCUSS MEDIATIONS AND OTHER DEMANDS.	0.50	
04/10/24	BGR	PREPARE FOR AND ATTEND 3 MEDIATIONS [4.2 NO CHARGE]	0.00	N/C
04/10/24	KLB	EMAILS FROM G. GAUKROGER REGARDING U.S. BANK AND EMAILS TO SUBPOENA COORDINATE AT U.S. BANK REGARDING TOLLING AGREEMENT	0.20	
04/10/24	GCG	ATTEND MEDIATION IN WEST PALM BEACH WITH TEPPER	2.80	
04/10/24	GCG	ATTEND MEDIATION IN WEST PALM BEACH WITH DECENBRINO	2.70	
04/10/24	GCG	ATTEND MEDIATION IN WEST PALM BEACH WITH EMMETS AND RELATED DRAFTING OF CONSENT JUDGMENT	1.50	
04/10/24	MJN	ATTEND AND PARTICIPATE IN MEDIATION FOR TEPPER, DICENBRINO AND EMMETS; PREPARE NECESSARY DOCUMENTS FOR POTENTIAL SETTLEMENTS.	5.50	
04/10/24	MJN	RESEARCH REGARDING U.S. BANK.	0.30	
04/10/24	WOD	ATTEND MEDIATION OF SH AGENTS DICENBRINO, TEPPER, AND EMMETS; INCLUSIVE OF IN-MEDIATION INVESTIGATION OF TEPPER TO IDENTIFY EMAILS (5.0); PREPARE EMMETS SETTLEMENT DOCUMENTS (1.0).	6.00	
04/12/24	WOD	ANALYZE DOCUMENTS IN CLOUD9 RELATED TO SH AGENT JASON SUSSMAN TO PREPARE FOR UPCOMING MEDIATION.	2.30	
04/15/24	BGR	CONTINUED MEDIATION FOLLOW-UP ISSUES	0.90	
04/15/24	KLB	PREPARE DEMAND LETTER UPON A. MITCHELL AND COMPILE ATTACHMENTS; FINALIZE AND PREPARE FOR SERVICE	0.30	

F E E S

Date	Attorney	Description	Hours
04/15/24	KLB	REVISE DEMAND LETTER TO M. WILDER AND COMPILE EXHIBITS TO SAME; FORMAT AND EMAILS REGARDING SERVICE BY FIRST CLASS AND CERTIFIED MAIL	0.30
04/15/24	MJN	CORRESPOND WITH A. MATTHEWS REGARDING DEMAND LETTER; RESOLVE ISSUE.	0.40
04/15/24	MJN	REVIEW PRIOR EMAILS RE: SUSSMAN.	0.70
04/15/24	MJN	CORRESPOND WITH R.SCHINDLER REGARDING [REDACTED] FOLLOW UP WITH TEAM; REVIEW DEMAND LETTER.	0.60
04/15/24	MJN	CORRESPOND WITH T. ZUCKERBROD REGARDING HULING MEDIATION.	0.40
04/15/24	MJN	CORRESPOND WITH [REDACTED]	0.40
04/16/24	BGR	MEDIATION FOLLOWUP /ABRAMSON/EMMETS AND [REDACTED]	0.90
04/16/24	BGR	ATTEND TO ISSUES RELATED TO 5TH AVENUE PHYSICIAN SETTLEMENT	0.80
04/16/24	MJN	CORRESPOND WITH C.MILLER REGARDING 5TH AVENUE PHYSICIANS.	0.30
04/16/24	MJN	CORRESPOND WITH C. SCHOEPPL REGARDING FIFTH AVENUE; FOLLOW UP REGARDING THE SAME.	0.40
04/17/24	BGR	WORK ON ABRAMSON SETTLEMENT ISSUES	0.90
04/17/24	BGR	WORK ON LITIGATION/CLAIM ANALYSIS	0.80
04/17/24	KLB	EMAILS TO AND FROM U.S. BANK REPRESENTATIVE REGARDING TOLLING AGREEMENT	0.10
04/17/24	KLB	UPDATE MASTER CHART TO REFLECT STATUS OF FRAUDULENT TRANSFER DEMAND LETTERS SENT TO SH AGENTS	0.30
04/17/24	KLB	REVIEW EMAIL REGARDING ADDRESS OF J. COROZZA AND REVISE DEMAND LETTER TO SAME (0.1); FINALIZE AND COMPILE EXHIBITS AND PREPARE FOR SERVICE OF DEMAND LETTER (0.3); UPDATE CHART AND EMAILS TO D. STERMER AND TEAM WITH DEMAND LETTERS (0.1)	0.50
04/17/24	MJN	REVIEW CORRESPONDENCE FROM J. COROZZA AND WORK ON TRANSMITTAL.	0.30
04/17/24	MJN	RESEARCH REGARDING U.S. BANK; REVIEW DOCUMENTS PRODUCED.	0.50
04/17/24	MJN	REVIEW AND REVISE RESCISSION AGREEMENT; PREPARE SETTLEMENT AGREEMENT.	1.30

F E E S

Date	Attorney	Description	Hours
04/17/24	MJN	REVIEW AND REVISE SETTLEMENT AGREEMENT WITH ABRAMSON; CORRESPOND WITH COUNSEL REGARDING THE SAME.	0.60
04/17/24	MJN	REVIEW AND FURTHER REVISE SETTLEMENT AGREEMENTS; CORRESPOND WITH TEAM REGARDING THE SAME.	0.80
04/17/24	MJN	REVIEW PRIOR CORRESPONDENCE REGARDING SUSSMAN.	0.60
04/17/24	WOD	ANALYZE DETAILED ACCOUNTS FROM VICTIMS RE: RELATIONSHIP WITH JASON SUSSMAN IN PREPARATION FOR MEDIATION.	1.00
04/18/24	BGR	MEDIATION PREPARATION ISSUES	0.90
04/18/24	MJN	REVIEW CORRESPONDENCE FROM CLASS COUNSEL; REVIEW SHARE FILE AND CLOUD 9 DOCUMENTS; REVIEW COMPLAINT.	2.80
04/18/24	MJN	REVIEW DOCUMENTS REGARDING J. SUSSMAN.	0.50
04/18/24	WOD	CONDUCT DETAILED ANALYSIS OF JASON SUSSMAN COMMUNICATIONS IN CLOUD9 TO PREPARE MEDIATION STATEMENT.	2.50
04/19/24	BGR	MEDIATION PREPARATION FOR MEDIATION WITH J. SUSSMAN	1.90
04/19/24	MJN	RESEARCH REGARDING FNBCC	1.00
04/19/24	MJN	CORRESPOND WITH COUNSEL REGARDING RESPONSE TO DEMAND LETTER. FOLLOW UP WITH RECEIVER TEAM REGARDING THE SAME.	0.40
04/19/24	MJN	CORRESPOND WITH C. MILLER REGARDING FIFTH AVENUE.	0.30
04/19/24	MJN	CORRESPOND WITH ██████████ REGARDING SETTLEMENT.	0.30
04/19/24	MJN	REVIEW REVISIONS TO ABRAMSON SETTLEMENT AGREEMENT. FOLLOW UP WITH COUNSEL REGARDING THE SAME.	0.30
04/19/24	MJN	CORRESPOND WITH C. MILLER REGARDING SETTLEMENT. ADVISE TEAM REGARDING THE SAME.	0.30
04/19/24	MJN	FINALIZE AND CORRESPOND WITH C.SCHOEPPL REGARDING RECISSION AGREEMENT.	0.40
04/19/24	MJN	CORRESPOND WITH W. DIAB REGARDING J. SUSSMAN AND NEW EMAILS.	0.60
04/19/24	WOD	CONTINUE INVESTIGATION OF JASON SUSSMAN COMMUNICATIONS WITH VICTIMS IN PREPARATION	1.50

F E E S

Date	Attorney	Description	Hours	
		FOR MEDIATION.		
04/19/24	WOD	DRAFT MEDIATION STATEMENT FOR MEDIATION WITH JASON SUSSMAN.	4.50	
04/20/24	MJN	REVIEW DOCUMENTS IN CLOUD9 REGARDING ADDITIONAL TARGETS.	1.40	
04/22/24	BGR	MEDIATION PREPARATION	1.20	
04/22/24	BGR	TEAM CALL ON FNBCC [.9 NO CHARGE]	0.00	N/C
04/22/24	KLB	DISCUSSIONS REGARDING UPCOMING MEDIATION WITH J. SUSSMAN AND EMAILS TO AND FROM W. DIAB REGARDING MEDIATION STATEMENT FOR SAME	0.20	
04/22/24	KLB	GATHER DOCUMENTS AND PLEADINGS AND PREPARE E-BINDER FOR MEDIATION WITH J. SUSSMAN SCHEDULED FOR APRIL 24, 2024	1.10	
04/22/24	GCG	CLIENT CONFERENCE REGARDING FNBCC ISSUES (.8); ATTENTION TO MEDIATION PLANNING AND SCHEDULING ISSUES (.2); REVIEW DOCUMENTS FROM CLIENT TEAM (.4)	1.40	
04/22/24	MJN	REVIEW RESPONSE FROM R. SCHINDLER REGARDING DARRIN CARLOMAGNO FOLLOW UP WITH TEAM; FOLLOW UP RESPONSE TO R. SCHINDLER.	0.50	
04/22/24	MJN	CORRESPOND WITH MEDIATOR REGARDING MEDIATIONS.	0.40	
04/22/24	MJN	REVIEW AND REVISE MEDIATION STATEMENT FOR SUSSMAN; FOLLOW UP WITH TEAM REGARDING THE SAME; ADDITIONAL RESEARCH REGARDING FINANCIAL INFORMATION.	2.20	
04/22/24	MJN	CONFERENCE CALL TO DISCUSS FNBCC AND OTHER ISSUES.	0.80	
04/22/24	WOD	FINALIZE MEDIATION STATEMENT TO JASON SUSSMAN AND DELIVER TO MEDIATOR AND SUSSMAN.	1.00	
04/23/24	BGR	PREPARE FOR AND ATTEND CALL WITH MEDIATOR	1.00	
04/23/24	BGR	SUSSMAN MEDIATION PREPARATION	2.00	
04/23/24	GCG	PRE-MEDIATION CONFERENCE WITH PETER KING WITH BERGER SINGERMAN COLLEAGUES	0.50	
04/23/24	GCG	PREPARE AND CONDUCT MEET AND CONFER WITH COUNSEL FOR US BANK WITH M. NILES AND PROVIDE STATUS UPDATE EMAIL TO CLIENT TEAM REGARDING SAME	0.60	

F E E S

Date	Attorney	Description	Hours	
04/23/24	MJN	PREPARE FOR MEDIATION WITH J. SUSSMAN; RESEARCH REGARDING THE SAME.	2.40	
04/23/24	MJN	CORRESPOND WITH D. CUCUIAT REGARDING RECENT DEMAND.	0.40	
04/23/24	MJN	CORRESPOND WITH C. MILLER REGARDING DEMAND AND SETTLEMENT.	0.30	
04/23/24	MJN	CORRESPOND WITH COUNSEL FOR U.S. BANK; ADDITIONAL RESEARCH IN CLOUD9 REGARDING DOCUMENTS.	1.20	
04/23/24	WOD	PRE-MEDIATION CALL WITH PETER KING.	0.50	
04/23/24	WOD	ANALYZE RECORDS OF SUSSMAN FAMILY DISTRIBUTION FROM SCHEME. [.2 NO CHARGE]	0.00	N/C
04/24/24	BGR	PREPARATION AND ATTENDANCE AT SUSSMAN MEDIATION AND FOLLOW-UP DISCUSSIONS WITH TEAM REGARDING SAME [6.5 NO CHARGE]	0.00	N/C
04/24/24	KLB	EMAILS REGARDING DEMAND LETTER TO A. LOMBARDO AND CONDUCT RESEARCH TO LOCATE BETTER ADDRESS (.3); EMAILS TO AND FROM M. NILES AND REVISE DEMAND LETTER AND FINALIZE SAME (.2); COMPILE ATTACHMENTS AND PREPARE FOR SERVICE BY FIRST CLASS AND CERTIFIED MAIL, RETURN RECEIPT REQUESTED (.2); UPDATE MASTER CHART (.1)	0.80	
04/24/24	KLB	REVIEW EMAILS REGARDING SETTLEMENT OF ADVERSARY PROCEEDING FILED AGAINST J. ABRAMSON	0.20	
04/24/24	GCG	PREPARE FOR (.5) AND ATTEND JASON SUSSMAN MEDIATION FROM 10:00 AM TO NOON AND 1:00-5:30 PM (6.5); POST-MEDIATION STRATEGY CONFERENCE WITH DSI, D. STERMER AND BERGER SINGERMAN CLIENT TEAM FROM 5:30 PM TO 6:30 PM (1)	8.00	
04/24/24	MJN	ATTEND MEDIATION WITH J. SUSSMAN; WORK THROUGH VARIOUS ISSUES WITH OTHER TARGETS. [7.0 NO CHARGE]	0.00	N/C
04/24/24	WOD	ATTEND MEDIATION OF JASON SUSSMAN. [5.0 NO CHARGE]	0.00	N/C
04/24/24	WOD	FOLLOW-UP CALL WITH CLIENT AFTER SUSSMAN MEDIATION TO DISCUSS NEW LITIGATION STRATEGY FOR SH AGENTS AND WELLS FARGO.	1.00	
04/25/24	BGR	WORK ON ANALYSIS OF COMPLAINTS THAT NEED TO BE FILED; EDIT DRAFT SUSSMAN COMPLAINT	1.60	
04/25/24	KLB	REVIEW SETTLEMENT AGREEMENT WITH J.	1.40	

F E E S

Date	Attorney	Description	Hours
		ABRAMSON AND PREPARE MOTION TO APPROVE SAME (.8); GATHER EXHIBITS TO SETTLEMENT AGREEMENT AND COMPILE SAME, AND PREPARE UNREDACTED AND REDACTED VERSIONS OF SETTLEMENT AGREEMENT (.6)	
04/25/24	KLB	ORGANIZE DOCUMENTS RECEIVED REGARDING TOLLING AGREEMENTS, AND CONFIDENTIALITY AGREEMENTS, ETC.	0.20
04/25/24	KLB	INITIAL PREPARATION OF MOTION TO APPROVE SETTLEMENT WITH FIFTH AVE. PHYSICIANS AND DISCUSSIONS WITH M. NILES REGARDING SAME	0.30
04/25/24	KLB	PREPARE INITIAL DRAFT OF NOTICE OF CONFIDENTIAL FILING WITH RESPECT TO FILING OF ABRAMSON SETTLEMENT AGREEMENT UNDER SEAL	0.40
04/25/24	GCG	REVIEW AND ANALYZE OUTLINE OF PLEADING AMENDMENT AND STRATEGY REGARDING CLAIMS AGAINST AGENTS AND RELATED EMAILS TO/FROM M. NILES AND D. STERMER	0.50
04/25/24	MJN	PREPARE AMENDED COMPLAINT AGAINST 11 TARGETS; RESEARCH IN CLOUD 9 REGARDING THE SAME.	6.50
04/25/24	MJN	REVIEW PROPOSED REVISIONS TO SETTLEMENT AGREEMENT; CORRESPOND WITH C.MILLER REGARDING THE SAME.	0.30
04/25/24	MJN	CORRESPOND WITH C. ZADANOSKY REGARDING SETTLEMENT AGREEMENT.	0.30
04/26/24	BGR	MEDIATION FOLLOW-UP ISSUES; REVIEW SETTLEMENT MOTIONS; FOLLOW-UP WITH MEDIATORS	1.20
04/26/24	KLB	CONTINUED PREPARATION OF MOTION TO APPROVE SETTLEMENT WITH FIFTH AVENUE PHYSICIANS AND PREPARE PROPOSED ORDER GRANTING SAME	1.30
04/26/24	KLB	REVISE MOTION TO SEAL TO INCLUDE ABRAMSON SETTLEMENT AGREEMENT AND INCLUDE ADDITIONAL LANGUAGE REGARDING FUTURE CONFIDENTIAL SETTLEMENT AGREEMENTS, AND REVISE PROPOSED ORDER (.6); EMAILS TO AND FROM M. NILES AND TELEPHONE CALL TO SAME REGARDING ADDITIONAL LANGUAGE INCLUDED IN DRAFT MOTION (.2); DISCUSSIONS REGARDING FILING OF VARIOUS COMPLAINTS (.1)	0.90
04/26/24	KLB	REVISE AND FINALIZE MOTION TO APPROVE SETTLEMENT WITH R. DONOFF AND COMPILE EXHIBITS TO SAME (.3); FORMAT AND E-FILE MOTION	0.60

F E E S

Date	Attorney	Description	Hours	
		TO APPROVE SETTLEMENT AND EMAILS REGARDING SERVICE (.3)		
04/26/24	KLB	REVISE AND FINALIZE MOTION TO APPROVE SETTLEMENT WITH ██████████ AND COMPILE EXHIBITS TO SAME (.3); FORMAT AND E-FILE MOTION AND PREPARE FOR SERVICE (.3)	0.60	
04/26/24	KLB	REVISE AND FINALIZE MOTION TO APPROVE SETTLEMENT WITH J. ABRAMSON AND COMPILE EXHIBITS TO SAME (.3); FORMAT AND E-FILE MOTION TO APPROVE SETTLEMENT AND PREPARE FOR SERVICE (.3)	0.60	
04/26/24	KLB	REVIEW ONLINE SCHEDULING PORTAL AND JUDGE HARPER'S PROCEDURES REGARDING SCHEDULING OF UMC HEARINGS (.2); EMAILS TO AND FROM B. RICH AND M. NILES REGARDING AVAILABLE HEARING DATES AND EMAILS TO JUDICIAL ASSISTANT REGARDING SCHEDULING OF THREE MOTIONS ON UMC CALENDAR (.2) [.4 NO CHARGE]	0.00	N/C
04/26/24	GCG	ANALYZE OUTLINE OF AMENDED COMPLAINT AND RELATED EMAILS TO/FROM M. NILES	0.70	
04/26/24	MJN	CORRESPOND WITH C. MILLER REGARDING FIFTH AVENUE.	0.30	
04/26/24	MJN	REVIEW FINANCIAL DOCUMENTS FOR DARRIN CARLOMAGNO	0.40	
04/26/24	MJN	FINALIZE SETTLEMENT AGREEMENTS FOR FILING.	0.50	
04/26/24	MJN	REVISE MOTION TO SEAL.	0.40	
04/26/24	MJN	WORK ON AGENT COMPLAINT; RESEARCH CLOUD 9.	5.20	
04/29/24	BGR	MEDIATION FOLLOW-UP	0.80	
04/29/24	BGR	FOLLOW-UP ON ADDITIONAL POTENTIAL CLAIM	0.60	
04/29/24	KLB	REVIEW EMAILS FROM M. NILES REGARDING FILING OF AMENDED COMPLAINT AND PREPARATION OF SUMMONS [.1 NO CHARGE]	0.00	N/C
04/29/24	GCG	STRATEGY AND ANALYSIS MEETING WITH LITIGATION TEAM AND REVIEW OF DRAFT PLEADING	0.80	
04/29/24	MJN	WORK ON AMENDED COMPLAINT; CONTINUE TO RESEARCH IN CLOUD 9.	4.40	
04/29/24	MJN	CONFERENCE CALL WITH TEAM TO DISCUSS COMPLAINTS. [.5 NO CHARGE]	0.00	N/C
04/29/24	MJN	CORRESPOND WITH B. PEARCE REGARDING SETTLEMENT AGREEMENT.	0.20	

F E E S

Date	Attorney	Description	Hours
04/30/24	BGR	PREPARE FOR AND ATTEND CALL WITH OFR	0.90
04/30/24	BGR	REVIEW AMENDED SUSSMAN COMPLAINT	0.60
04/30/24	KLB	GATHER ADDRESSES FOR VARIOUS DEFENDANTS AND PREPARE SUMMONSES FOR SAME	1.30
04/30/24	KLB	PREPARE MOTION TO APPROVE SETTLEMENT WITH ██████████ AND PREPARE PROPOSED ORDER; EMAILS TO AND FROM M. NILES	1.30
04/30/24	KLB	EMAILS REGARDING SCHEDULING OF MOTION TO APPROVE SETTLEMENT AND REVIEW ONLINE SCHEDULING PORTAL REGARDING AVAILABLE DATES; EMAILS TO JUDICIAL ASSISTANT REGARDING SAME	0.30
04/30/24	MJN	REVIEW CLOUD 9 DATA AND UPDATE COMPLAINT.	1.20
04/30/24	MJN	FOLLOW UP WITH C. MILLER REGARDING FIFTH AVENUE PHYSICIANS; REVIEW CORRESPONDENCE FROM C. SCHOPPLE REGARDING RESCISSION AGREEMENT.	0.30
04/30/24	MJN	CORRESPOND WITH CLASS COUNSEL REGARDING COMPLAINT	1.10
04/30/24	MJN	CORRESPOND WITH R. PEARCE REGARDING ██████████ SETTLEMENT; FOLLOW UP WITH TEAM REGARDING THE SAME.	0.30
05/01/24	KLB	EMAILS REGARDING AVAILABILITY FOR UMC HEARINGS ON SETTLEMENT MOTIONS, ETC. (.2); PREPARE NOTICE OF HEARING ON MOTION TO APPROVE SETTLEMENT WITH ██████████ AND MOTION TO DETERMINE CONFIDENTIALITY OF COURT RECORDS AND TO FILE UNREDACTED SETTLEMENT AGREEMENTS UNDER SEAL (.4); PREPARE NOTICE OF HEARING ON MOTIONS TO APPROVE SETTLEMENT WITH R. DONOFF AND ██████████ (.4); PREPARE NOTICE OF HEARING ON MOTION TO APPROVE SETTLEMENT WITH J. ABRAMSON AND EMAILS TO AND FROM C. ZADANOSKY REGARDING AVAILABILITY (.4); EMAILS TO COUNSEL IN OFR V. NSI ACTION REGARDING HEARING AVAILABILITY AND REVIEW NUMEROUS RESPONSES (.3)	1.70
05/01/24	KLB	REVISE AND FINALIZE MOTION TO APPROVE SETTLEMENT WITH ██████████ AND COMPILE EXHIBITS TO SAME (.4); FORMAT AND E-FILE MOTION AND PREPARE FOR SERVICE (.2); EMAILS TO COUNSEL FOR ██████████ AND TO ██████████ FOR HEARING AVAILABILITY (.2)	0.80

F E E S

Date	Attorney	Description	Hours	
05/01/24	KLB	DISCUSSIONS WITH M. NILES REGARDING UPCOMING DEADLINE TO FILE COMPLAINTS, GATHERING OF EXHIBITS, ETC. [.2 NO CHARGE]	0.00	N/C
05/01/24	GCG	STRATEGY CONFERENCE WITH M. NILES (.2); ATTENTION TO CLIENT EMAILS (NC)	0.20	
05/01/24	MJN	REVIEW SETTLEMENT AGREEMENT WITH [REDACTED] AND MOTION TO APPROVE; CORRESPOND WITH D. STERMER REGARDING THE SAME. CORRESPOND WITH K.BURNS REGARDING HEARINGS SCHEDULED ON VARIOUS SETTLEMENTS.	0.70	
05/01/24	MJN	CORRESPOND WITH C. MILLER REGARDING FIFTH AVENUE PHYSICIANS.	0.30	
05/01/24	MJN	REVIEW CORRESPONDENCE FROM M.SEEMAN COUNSEL REGARDING FIFTH AVENUE PHYSICIANS; FOLLOW UP WITH TEAM REGARDING THE SAME.	0.30	
05/02/24	KLB	REVISE AND FINALIZE THREE NOTICES OF HEARING FOR MAY 21, 22 AND 23 FOR UMC HEARINGS ON VARIOUS MOTIONS TO APPROVE SETTLEMENT AND MOTION TO DETERMINE CONFIDENTIALITY OF COURT RECORDS, AND EMAILS TO AND FROM C. ZADANOSKY REGARDING AVAILABILITY (.8); FORMAT AND E-FILE NOTICES OF HEARING AND UPLOAD SAME TO ONLINE SCHEDULING PORTAL ALONG WITH FILED MOTIONS (.5); PREPARE FOR SERVICE OF HEARING NOTICES UPON COUNSEL IN OFR V. NSI ACTION, AS WELL AS COUNSEL FOR J. ABRAMSON, [REDACTED] R. DONOFF, AND [REDACTED] (.3)	1.60	
05/02/24	KLB	EMAILS REGARDING SETTLEMENT AGREEMENT WITH J. ABRAMSON AND TELEPHONE DISCUSSIONS WITH M. NILES AND WITH CLERK OF COURT REGARDING SAME	0.50	
05/02/24	GCG	PREPARE FOR AND HOST TELECONFERENCE WITH E. MARK REGARDING PROPOSED CLAIMS AGAINST THIRD-PARTIES AND RELATED EMAILS AND CLIENT EMAILS	1.20	
05/02/24	MJN	CORRESPOND WITH TEAM REGARDING ISSUES WITH ABRAMSON FILED SETTLEMENT AGREEMENT.	0.40	
05/02/24	MJN	REVIEW AND REVISE AMENDED SUSSMAN COMPLAINT.	0.60	
05/02/24	WOD	ANALYZE AMENDED COMPLAINT AGAINST SH AGENTS AND MAKE REVISIONS.	1.00	
05/03/24	KLB	TELEPHONE CONFERENCE WITH CLERK REGARDING SETTLEMENT AGREEMENT WITH J. ABRAMSON AND	0.20	

F E E S

Date	Attorney	Description	Hours	
		REDACTIONS, ETC.		
05/03/24	MJN	PREPARE MOTION TO APPROVE CONSENT JUDGMENT.	1.20	
05/03/24	MJN	CONFERENCE CALL WITH C.MILLER REGARDING 5TH AVENUE PHYSICIANS.	0.30	
05/03/24	MJN	PREPARE TOLLING AGREEMENT WITH U.S. BANK.	0.40	
05/03/24	MJN	REVIEW CORRESPONDENCE REGARDING A. LOMBARDO. CORRESPOND WITH TEAM REGARDING THE SAME. RESEARCH IN CLOUD 9.	0.60	
05/04/24	MJN	REVIEW AND REVISE MOTION TO APPROVE CONSENT JUDGMENT; CORRESPOND WITH G. MELCHOIR REGARDING CONSENT JUDGMENTS	0.40	
05/05/24	MJN	WORK ON AMENDED COMPLAINT; RESEARCH IN CLOUD9 REGARDING EACH AGENT.	2.70	
05/06/24	MJN	WORK ON EXHIBIT LIST FOR SUSSMAN COMPLAINT.	1.20	
05/06/24	MJN	PREPARE TOLLING AGREEMENT FOR ██████████ FOLLOW UP WITH ██████████ REGARDING THE SAME	1.00	
05/06/24	MJN	FINALIZE MOTION TO APPROVE CONSENT JUDGMENT FOR FILING.	0.30	
05/07/24	KLB	REVISE AND FINALIZE MOTION TO APPROVE SETTLEMENT WITH FIFTH AVENUE PHYSICIANS AND FORMAT SAME (.3); COMPILE EXHIBITS TO MOTION TO APPROVE SETTLEMENT AND PREPARE FOR FILING (.3) E-FILE MOTION TO APPROVE SETTLEMENT WITH FIFTH AVENUE PHYSICIANS AND PREPARE FOR SERVICE (.2); REVIEW ONLINE SCHEDULING PORTAL REGARDING HEARING AVAILABILITY AND EMAILS TO TEAM AND TO COUNSEL REGARDING SAME (.3)	1.10	
05/07/24	KLB	GATHER AND ORGANIZE EXHIBITS TO AMENDED COMPLAINT TO BE FILED AGAINST J. SUSSMAN, ETC. AND MULTIPLE DISCUSSIONS WITH M. NILES REGARDING SAME	1.70	
05/07/24	GCG	DRAFT COMPLAINT AGAINST PELICAN CAPITAL MANAGEMENT	5.50	
05/07/24	GCG	LITIGATION STRATEGY CONFERENCE WITH DSI AND BERGER SINGERMAN TEAMS [.6 NO CHARGE]	0.00	N/C
05/07/24	MJN	PREPARE FOR MEDIATION WITH ██████████ REVIEW CORRESPONDENCE IN CLOUD9 REGARDING THE SAME.	3.20	
05/07/24	MJN	WORK ON COMPLAINTS (FINALIZE ADVISOR COMPLAINT AND EXHIBITS; WORK THROUGH WELLS	4.40	

F E E S

Date	Attorney	Description	Hours	
		FARGO COMPLAINT; AND REVIEW OTHERS); FOLLOW UP WITH CERTAIN PARTIES REGARDING TOLLING AGREEMENTS AND RESPOND TO INQUIRIES REGARDING THE SAME.		
05/07/24	MJN	FINALIZE SETTLEMENT AGREEMENT WITH FIFTH AVENUE PHYSICIANS.	0.60	
05/07/24	MJN	CORRESPOND WITH TEAM REGARDING SETTLEMENT MOTIONS AND HEARING DATES. [.3 NO CHARGE]	0.00	N/C
05/07/24	WOD	CONFERENCE CALL WITH RECEIVER AND LITIGATION TEAM TO DISCUSS VARIOUS LAWSUITS TO BE FILED THIS WEEK AGAINST CLAW BACK AND AIDING AND ABETTING TARGETS, INCLUDING PELICAN, WELLS FARGO, AND SALES AGENTS. [1.0 NO CHARGE]	0.00	N/C
05/07/24	WOD	ANALYZE SEEMAN HOLTZ DATA BASE FOR ADDITIONAL EVIDENCE OF NOTE SALES BY ██████████ ██████████ IN PREPARATION FOR CONTINUATION OF MEDIATION.	1.00	
05/08/24	KLB	REVIEW MULTIPLE EMAILS REGARDING FILING OF COMPLAINTS AND GATHERING OF EXHIBITS, AND REVIEW EMAILS FROM T. CARUSO WITH ADDITIONAL EXHIBITS TO COMPLAINT AGAINST SUSSMAN, ETC. [.3 NO CHARGE]	0.00	N/C
05/08/24	KLB	EMAILS REGARDING FILING OF COMPLAINT AGAINST PELICAN AND REVISE SAME (.3); PREPARE SUMMONS TO PELICAN CAPITAL MANAGEMENT LLC AND PREPARE NOTICE OF RELATED CASE TO BE FILED IN ACTION AGAINST PELICAN CAPITAL MANAGEMENT (.7); EMAILS TO AND FROM G. GAUKROGER REGARDING SAME (.1)	1.10	
05/08/24	KLB	PREPARE NOTICE OF RELATED CASE FOR CASE AGAINST PELICAN CAPITAL MANAGEMENT LLC AND REVISE COMPLAINT	0.70	
05/08/24	KLB	GATHER CORPORATE INFORMATION FOR PELICAN CAPITAL MANAGEMENT LLC AND PREPARE SUMMONS TO BE SERVED UPON SAME	0.40	
05/08/24	KLB	PREPARE NOTICE OF HEARING ON MOTION TO APPROVE SETTLEMENT WITH FIFTH AVENUE PHYSICIANS SERVICES AND MOTION FOR ENTRY OF CONSENT JUDGMENT AND EMAILS TO COUNSEL REGARDING AVAILABILITY	0.60	
05/08/24	GCG	ATTEND ██████████ MEDIATION AND REVIEW/REVISE DRAFT SETTLEMENT AGREEMENT [3.5 NO CHARGE]	0.00	N/C
05/08/24	GCG	FURTHER REVISIONS TO PELICAN COMPLAINT	1.20	

F E E S

Date	Attorney	Description	Hours	
05/08/24	MJN	ATTEND MEDIATION AND PREPARE SETTLEMENT AGREEMENT.	5.80	
05/08/24	MJN	CORRESPOND WITH U.S. BANK REGARDING TOLLING AGREEMENT; REVIEW AND REVISE AGREEMENT.	0.50	
05/08/24	MJN	CORRESPOND WITH TYLER B. REGARDING TOLLING AGREEMENT. CORRESPOND WITH W.DIAB AND T. CARUSO REGARDING COMPLAINT.	0.40	
05/08/24	WOD	DISCUSS STRATEGY FOR CLAIMS AND COMPLAINT AGAINST ██████████	0.30	
05/09/24	BGR	ATTEND TO SUSSMAN COMPLAINT ISSUES	1.20	
05/09/24	KLB	REVISE AND FINALIZE COMPLAINT AGAINST PELICAN CAPITAL MANAGEMENT LLC AND REVISE AND FINALIZE NOTICE OF RELATED CASE AND FILING OF PROCEDURES ORDER (.6); FORMAT SUMMONS AND PREPARE FOR FILING AND E-FILE COMPLAINT, NOTICE AND SUMMONS FOR ISSUANCE (.6); CIRCULATE FILED PLEADINGS TO TEAM (.2)	1.40	
05/09/24	KLB	REVIEW ON-LINE SCHEDULING PORTAL TO CONFIRM AVAILABILITY FOR HEARING AND REVISE AND FINALIZE NOTICE OF HEARING FOR MAY 29, 2024 UMC HEARINGS (.4); UPLOAD FILED MOTIONS TO ON-LINE SCHEDULING PORTAL AND FORMAT AND E-FILE HEARING NOTICE (.3); UPLOAD FILED HEARING NOTICE AND EMAILS TO COUNSEL (.2)	0.90	
05/09/24	KLB	REVISE AMENDED COMPLAINT AND FORMAT SAME (.7); DISCUSSIONS WITH M. NILES REGARDING EXHIBITS TO AMENDED COMPLAINT AND ASSEMBLE SAME (.6);	1.30	
05/09/24	KLB	FINALIZE AND FORMAT AMENDED COMPLAINT WITH EXHIBITS AND FORMAT ELEVEN SUMMONSES FOR ISSUANCE UPON ADDITIONAL DEFENDANTS (.4); E-FILE AMENDED COMPLAINT, AND UPLOAD ELEVEN SUMMONSES TO BE ISSUED BY CLERK (.5); CIRCULATE FILED PLEADINGS TO TEAM (.2)	1.10	
05/09/24	MJN	FINALIZE COMPLAINTS AND TOLLING AGREEMENTS; CORRESPOND WITH D. STERMER, G.GAUGKROGER AND W. DIAB REGARDING THE SAME.	4.70	
05/09/24	WOD	CONDUCT FINAL REVIEW OF PELICAN COMPLAINT AND PREPARE FOR FILING. [1.2 NO CHARGE]	0.00	N/C
05/09/24	WOD	CONDUCT FINAL REVIEW OF COMPLAINT AGAINST SALES AGENTS TO PREPARE FOR FILING.	1.20	
05/13/24	BGR	WORK ON CASE STATUS ISSUES AND PREPARE FOR HEARINGS	1.20	

F E E S

Date	Attorney	Description	Hours	
05/13/24	BGR	WORK ON NEXT STATUS REPORT	0.70	
05/13/24	KLB	EMAILS FROM G. GAUKROGER REGARDING SERVICE UPON PELICAN CAPITAL AND GATHER FILED COMPLAINT AND NOTICE OF RELATED CASE, AND ISSUED SUMMONS FOR SERVICE	0.40	
05/13/24	GCG	ATTENTION TO SUMMONSES AND SERVICE REQUESTS FOR SERVICE OF NEW CASES ON DEFENDANTS IN PELICAN AND WELLS FARGO ACTION, INCLUDING EMAILS TO COUNSELS FOR DEFENDANTS TO ACCEPT SERVICE	0.60	
05/13/24	MJN	REVIEW AND REVISE ORDERS ON SETTLEMENT AGREEMENTS.	0.40	
05/13/24	MJN	REVIEW SUMMONSES; CORRESPOND WITH TEAM REGARDING WELLS FARGO AND PELICAN.	0.40	
05/13/24	MJN	REVIEW ██████████ SETTLEMENT AND CORRESPOND WITH TEAM.	0.30	
05/14/24	BGR	WORK ON STATUS REPORT ISSUES	0.70	
05/14/24	KLB	GATHER DOCUMENTS AND PLEADINGS AND PREPARE E-BINDER FOR MAY 21, 2024, HEARING TO CONSIDER MOTION TO APPROVE SETTLEMENT WITH D. COYMAN AND MOTION TO DETERMINE CONFIDENTIALITY OF COURT RECORDS; EMAILS TO TEAM	0.50	
05/14/24	KLB	GATHER DOCUMENTS FOR MAY 22, 2024, HEARING ON MOTION TO APPROVE SETTLEMENT WITH ██████████ AND SETTLEMENT WITH RICHARD DONOFF, AND PREPARE E-BINDER FOR SAME	0.40	
05/14/24	KLB	GATHER DOCUMENTS FOR HEARING ON MAY 23, 2024, TO CONSIDER MOTION TO APPROVE SETTLEMENT WITH J. ABRAMSON AND PREPARE E-BINDER FOR SAME; EMAILS TO TEAM [.3 NO CHARGE]	0.00	N/C
05/14/24	KLB	REVISE AND FINALIZE PROPOSED ORDER GRANTING MOTION TO APPROVE SETTLEMENT WITH ██████████ ORDER GRANTING MOTION TO APPROVE SETTLEMENT WITH R. DONOFF, ORDER GRANTING MOTION TO APPROVE SETTLEMENT WITH ██████████ AND ORDER GRANTING MOTION TO APPROVE SETTLEMENT WITH J. ABRAMSON (.4); FORMAT AND SUBMIT PROPOSED ORDERS IN ADVANCE OF UPCOMING HEARINGS PURSUANT TO COURT'S INSTRUCTIONS (.4); FINALIZE AND FORMAT PROPOSED ORDER GRANTING MOTION TO DETERMINE CONFIDENTIALITY OF COURT RECORDS AND SUBMIT SAME (.2)	1.00	

F E E S

Date	Attorney	Description	Hours	
05/14/24	GCG	WORK ON CASE MANAGEMENT TASKS REGARDING NEWLY FILED CASES AND RELATED CLIENT EMAILS	0.30	
05/14/24	MJN	CORRESPOND WITH LITIGATION TEAM REGARDING DISCOVERY. [.3 NO CHARGE]	0.00	N/C
05/15/24	BGR	FOLLOW-UP ON NEXT WAVE OF COMPLAINTS	0.80	
05/15/24	BGR	HEARING PREPARATION	0.80	
05/15/24	KLB	INITIAL PREPARATION OF MOTION TO APPROVE SETTLEMENT WITH R. HULING	0.30	
05/15/24	GCG	CLIENT EMAILS REGARDING PRESS ISSUES [.2 NO CHARGE]	0.00	N/C
05/15/24	MJN	REVIEW AND REVISE MOTION TO APPROVE [REDACTED] SETTLEMENT AGREEMENT.	0.40	
05/15/24	MJN	CORRESPOND WITH T. CARUSO REGARDING OUTSTANDING SETTLEMENTS.	0.40	
05/16/24	BGR	ATTEND TO NEXT PHASE OF LITIGATION ANALYSIS AND CLASS ISSUES	1.80	
05/16/24	BGR	ATTEND TO ISSUES FROM ROSE SCHINDLER ON DONOFF SETTLEMENT	0.90	
05/16/24	BGR	PREPARE FOR HEARINGS ON SETTLEMENT	1.20	
05/16/24	KLB	CONTINUED PREPARATION OF MOTION TO APPROVE SETTLEMENT WITH [REDACTED] AND PREPARE PROPOSED ORDER GRANTING SAME (.8); PREPARE REDACTED VERSION OF SETTLEMENT AGREEMENT AND EMAILS TO M. NILES (.3)	1.10	
05/16/24	KLB	REVISE AND FINALIZE MOTION TO APPROVE SETTLEMENT WITH [REDACTED] AND COMPILE ATTACHMENTS TO SAME (.3); FORMAT AND E-FILE MOTION TO APPROVE SETTLEMENT AND EMAILS TO COUNSEL FOR [REDACTED] WITH MOTION AND AVAILABLE HEARING DATE (.3); REVIEW ONLINE SCHEDULING PORTAL AND EMAILS TO AND FROM D. STERMER REGARDING AVAILABILITY (.1)	0.70	
05/16/24	KLB	DISCUSSIONS WITH M. NILES REGARDING CONFIDENTIAL INFORMATION IN DONOFF SETTLEMENT MOTION AND CONDUCT RESEARCH REGARDING FILING OF NOTICE OF CONFIDENTIAL FILING (.2); PREPARE NOTICE OF CONFIDENTIAL FILING AND EMAILS TO M. NILES (.6)	0.80	
05/16/24	KLB	INITIAL PREPARATION OF NOTICE OF HEARING ON MOTION TO APPROVE SETTLEMENT WITH [REDACTED]	0.20	
05/16/24	MJN	CORRESPOND WITH R. SCHINDLER REGARDING	0.50	

F E E S

Date	Attorney	Description	Hours	
		DONOFF SETTLEMENT; REVIEW SETTLEMENT PAPERS.		
05/16/24	MJN	REVIEW AND REVISE MOTION TO APPROVE SETTLEMENT AGREEMENT WITH [REDACTED]	0.40	
05/16/24	MJN	REVIEW STATUS OF SERVICE OF COMPLAINTS; COMMUNICATE WITH R. SCHINDLER REGARDING THE SAME.	0.30	
05/17/24	BGR	WORK ON STATUS REPORT	0.90	
05/17/24	KLB	EMAILS TO COUNSEL REGARDING AVAILABILITY FOR HEARING ON MOTION TO APPROVE SETTLEMENT WITH [REDACTED] [.2 NO CHARGE]	0.00	N/C
05/17/24	KLB	FINALIZE FOUR REVISED PROPOSED ORDERS APPROVING SETTLEMENTS WITH [REDACTED] DONOFF, [REDACTED] AND [REDACTED] AND FORMAT AND SUBMIT SAME	0.50	
05/17/24	MJN	CORRESPOND WITH C.SCHRIEBER REGARDING SETTLEMENT ORDERS.	0.30	
05/17/24	MJN	CORRESPOND WITH R. SCHINDLER REGARDING SETTLEMENTS AND ADDITIONAL DEMANDS; REVIEW AND REVISE CONFIDENTIALITY NOTICE.	1.20	
05/19/24	MJN	PREPARE FOR HEARINGS ON SETTLEMENT AGREEMENTS; FOLLOW UP WITH R. SCHINDLER REGARDING CONFIDENTIALITY REQUESTS.	1.00	
05/20/24	BGR	HEARING PREPARATION AND ATTEND TO ISSUES RELATED TO DONOFF	0.90	
05/20/24	BGR	WORK ON PELICAN RECOVERY ISSUES	0.80	
05/20/24	KLB	FORMAT AND SUBMIT FIVE PROPOSED ORDERS ON VARIOUS SETTLEMENT MOTIONS AND MOTION TO DETERMINE CONFIDENTIALITY AND SUBMIT SAME FOR UPCOMING HEARINGS; EMAILS TO G. GAUKROGER REGARDING SAME	0.50	
05/20/24	GCG	STRATEGY CONFERENCE WITH M. NILES AND B. RICH REGARDING HEARINGS AND ISSUES REGARDING DONOFF (.3); REVIEW AND REVISE DRAFT EMAIL CORRESPONDENCE REGARDING SAME (.2)	0.50	
05/20/24	MJN	CORRESPOND WITH R. SCHINDLER REGARDING SETTLEMENTS; RESEARCH; REVISE NOTICE OF CONFIDENTIALITY.	1.00	
05/20/24	MJN	PREPARE TEAM FOR HEARINGS ON SETTLEMENT MOTIONS. [.4 NO CHARGE]	0.00	N/C
05/20/24	MJN	REVIEW ALLEGATIONS MADE BY R. SCHINDLER;	0.80	

F E E S

Date	Attorney	Description	Hours	
		REVIEW PRIOR EMAILS AND SETTLEMENT AGREEMENT; RESEARCH REGARDING THE SAME.		
05/21/24	BGR	ATTEND TO ISSUES RELATED TO DONOFF SETTLEMENT; NEW HEARING DATE AND REDACTED AGREEMENT	2.10	
05/21/24	BGR	PREPARE FOR HEARINGS	0.80	
05/21/24	BGR	FOLLOW-UP ON DOCUMENTS BEING REQUESTED/BANK RECORDS	0.80	
05/21/24	GCG	PREPARE FOR AND ARGUE AT HEARING SEEKING ORDER APPROVING SETTLEMENT AND CONFIDENTIAL COURT FILING OF SETTLEMENT AGREEMENTS	1.00	
05/21/24	MJN	CORRESPOND WITH TEAM REGARDING SETTLEMENT AGREEMENTS WITH SH AGENTS. FINALIZE AGREEMENTS AND NOTICE OF HEARING ISSUES.	0.60	
05/21/24	MJN	ATTEND HEARING ON MOTION TO APPROVE CONFIDENTIALITY PROVISIONS AND ██████████ SETTLEMENT	0.40	
05/21/24	MJN	PREPARE LETTER TO R.SCHINDLER REGARDING DONOFF SETTLEMENT.	0.50	
05/22/24	BGR	PREPARE FOR AND ATTEND SETTLEMENT HEARINGS	0.90	
05/22/24	BGR	CALLS WITH OFR AND FOLLOW-UP ON DOCUMENT ISSUES	0.80	
05/22/24	KLB	REVISE NOTICE OF HEARING FOR MAY 30, 2024, HEARING AND EMAILS TO AND FROM A. BLANCO REGARDING SAME	0.20	
05/22/24	KLB	REVIEW AND RESPOND TO EMAILS FROM G. MELCHIOR REGARDING HEARING IN STERMER V. ABRAMSON MATTER AND EMAILS TO SAME WITH MOTION TO APPROVE SETTLEMENT AND HEARING NOTICE (.2); EMAILS REGARDING ADDING OFR TO SERVICE LIST IN ADDITIONAL CASES FILED THAT RELATE TO OFR ACTION (.1)	0.30	
05/22/24	MJN	ATTEND SETTLEMENT HEARING; REVIEW ORDERS [.4 NO CHARGE]	0.00	N/C
05/22/24	MJN	CORRESPOND WITH ██████████ REGARDING INTERVIEW; FOLLOW UP WITH TEAM REGARDING THE SAME.	0.20	
05/22/24	MJN	CORRESPOND WITH R. SCHINDLER REGARDING DARRIN CARLOMAGNO	0.30	
05/22/24	MJN	CORRESPOND WITH C. ZADONSKY REGARDING	0.20	

F E E S

Date	Attorney	Description	Hours
		MOTION TO APPROVE SETTLEMENT.	
05/23/24	BGR	ATTEND TO INQUIRIES FORM CREDITORS	0.80
05/23/24	BGR	FOLLOW-UP ON HEARINGS AND PREPARE FOR HEARINGS ON MAY 29 AND MAY 30, 2024	0.70
05/24/24	BGR	REVIEW AND RESPOND TO DONOFF COUNSEL ON BREACH OF AGREEMENT BY DONOFF	0.80
05/24/24	BGR	FOLLOW-UP ON PALUZZI SETTLEMENT ISSUES	0.40
05/24/24	MJN	REVIEW CORRESPONDENCE RELATED TO DONOFF BREACH OF AGREEMENT.	0.50
05/24/24	MJN	REVIEW CORRESPONDENCE REGARDING POTENTIAL SETTLEMENTS WITH OTHER SH AGENTS.	0.40
05/28/24	BGR	PREPARE FOR HEARINGS ON MAY 29, 2024	0.80
05/28/24	KLB	REVISE AND FINALIZE PROPOSED ORDER GRANTING MOTION TO APPROVE SETTLEMENT WITH FIFTH AVENUE PHYSICIANS AND SUBMIT SAME; FINALIZE AND SUBMIT PROPOSED ORDER GRANTING MOTION FOR ENTRY OF CONSENT FINAL JUDGMENT	0.40
05/28/24	MJN	CORRESPOND WITH C. MILLER REGARDING FIFTH AVENUE SETTLEMENT.	0.20
05/28/24	MJN	PROVIDE SUMMARY OF MOTIONS SET FOR HEARING ON MAY 29, 2024.	0.40
05/28/24	MJN	WORK ON MOTION TO ENFORCE SETTLEMENT.	0.40
05/28/24	MJN	REVIEW AND APPROVE ORDERS FOR HEARING ON SETTLEMENT AND CONSENT JUDGMENT.	0.30
05/29/24	BGR	PREPARE FOR AND ATTEND HEARING ON 5TH AVE SETTLEMENT AND CONSENTS JUDGMENTS	0.80
05/29/24	BGR	CALL AND PREPARE FOR HEARING ON MAY 30, 2024	0.80
05/29/24	KLB	REVIEW MULTIPLE EMAILS FROM PROCESS SERVER REGARDING STATUS OF SERVICE OF PROCESS OF SUMMONSES AGAINST VARIOUS DEFENDANTS IN THE STERMER V. SUSSMAN, ETC. MATTER	0.40
05/29/24	KLB	EMAILS REGARDING ORDER ON [REDACTED] AND DONOFF SETTLEMENTS AND REVISE AND FINALIZE PROPOSED ORDERS GRANTING SETTLEMENT MOTIONS (.3); TELEPHONE CALL WITH M. NILES AND FINALIZE AND SUBMIT PROPOSED ORDERS (.3)	0.60
05/29/24	KLB	GATHER PLEADINGS FOR HEARING AND PREPARE E-BINDER FOR MAY 30, 2024, HEARING; EMAILS TO M. NILES REGARDING HEARING	0.60

F E E S

Date	Attorney	Description	Hours	
05/29/24	KLB	FINALIZE, FORMAT AND SUBMIT PROPOSED CONSENT JUDGMENT AS TO LIABILITY	0.20	
05/29/24	MJN	WORK ON RECEIVER'S REPORT	3.00	
05/29/24	MJN	WORK ON MOTION TO ENFORCE SETTLEMENT AGREEMENT WITH DONOFF.	2.40	
05/29/24	MJN	CORRESPOND WITH TEAM REGARDING MOTION TO APPROVE SETTLEMENT AND CONSENT JUDGMENTS [.5 NO CHARGE]	0.00	N/C
05/30/24	BGR	PREPARE FOR AND ATTEND HEARINGS ON MOTION TO APPROVE DONOFF AND [REDACTED]	0.90	
05/30/24	BGR	REVISE DRAFT FOURTH RECEIVER REPORT	1.20	
05/30/24	BGR	FOLLOW-UP ON PELICAN LITIGATION AND MEDIATION SCHEDULING	0.50	
05/30/24	KLB	ORGANIZE FINANCIAL INFORMATION RECEIVED FROM J. ABRAMSON	0.50	
05/30/24	GCG	TELEPHONE CALL WITH D. STERMER REGARDING HEARING ISSUES (.2); FOLLOW UP REGARDING SCHEDULING MEDIATIONS WITH NEW DEFENDANTS (.2)	0.40	
05/30/24	MJN	CORRESPOND WITH A. MARCUS REGARDING SETTLEMENT AGREEMENT WITH ABRAMSON; REVIEW AGREEMENT.	0.30	
05/30/24	MJN	REVIEW STATUS OF PROCEEDING AGAINST TEPPER AND DICEMBRINO; CORRESPOND WITH W. DIAB REGARDING THE SAME.	0.50	
05/30/24	MJN	FURTHER REVISE 4TH RECEIVER'S REPORT.	0.50	
05/30/24	MJN	REVIEW NOTICE OF ACCEPTANCE OF SERVICE (RE: PELICAN) AND VARIOUS EMAILS.	0.30	
05/30/24	MJN	CORRESPOND WITH M. WILDER REGARDING PROCEDURES ORDER.	0.20	
05/31/24	BGR	ATTEND TO SETTLEMENT ISSUES STATUS AND DONOFF LETTER (.4)	0.40	
05/31/24	KLB	REVISE AND FINALIZE NOTICE OF ACCEPTANCE OF SERVICE OF PROCESS REGARDING SUIT AGAINST PELICAN CAPITAL MANAGEMENT AND FORMAT AND E-FILE NOTICE; EMAILS TO A. RUTTENBERG	0.30	
05/31/24	MJN	REVIEW NOTICE OF DEFAULT (RE: DONOFF)	0.20	
06/02/24	MJN	REVIEW NOTICE OF DEFAULT: PREPARE NOTICE OF DEFAULT (PAYMENT/COOPERATION); REVIEW REVISED RECEIVER'S REPORT.	1.20	

F E E S

Date	Attorney	Description	Hours
06/02/24	MJN	REVIEW CORRESPONDENCE FROM P. BECK (.1); REVIEW COMPLAINT AND PRIOR DEMAND REGARDING THE SAME (.2); CORRESPOND WITH RECEIVER'S TEAM REGARDING THE SAME (.1).	0.40
06/03/24	BGR	WORK ON 4TH REPORT DRAFTS	0.90
06/03/24	KLB	REVIEW MULTIPLE EMAILS REGARDING STATUS OF SERVICE OF PROCESS ON MULTIPLE DEFENDANTS AND CONDUCT RESEARCH TO LOCATE BETTER ADDRESSES FOR SERVICE OF PROCESS (.7); PREPARE ALIAS SUMMONSES AND EMAILS TO M. NILES (.4)	1.10
06/03/24	GCG	REVIEW AND REVISED DRAFT SETTLEMENT AGREEMENT WITH PALUZZI AND RELATED CLIENT TEAM EMAILS	0.20
06/03/24	MJN	PREPARE SETTLEMENT AGREEMENTS FOR ADDITIONAL SH AGENTS.	1.80
06/03/24	MJN	CONFERENCE CALL WITH D. STERMER AND DSI TEAM TO DISCUSS DISCOVERY AND OTHER STRATEGY.	0.80
06/03/24	MJN	REVIEW AND REVISE NOTICE OF DEFAULT UNDER SETTLEMENT (.3); CORRESPOND WITH D. STERMER REGARDING THE SAME (.2); FINALIZE AND DISTRIBUTE TO COUNSEL (.3)	0.80
06/03/24	MJN	REVIEW RESPONSE BY J. COROZZA.	0.30
06/03/24	MJN	REVIEW STATUS OF COMPLAINT AND SUMMONS REGARDING AMENDED SUSSMAN COMPLAINT; PROVIDE SUMMARY TO TEAM.	0.70
06/03/24	MJN	FURTHER REVISE FOURTH REPORT; CORRESPOND WITH TEAM REGARDING THE SAME.	0.50
06/03/24	MJN	REVIEW APPLICATIONS FOR LLC; FINALIZE COMPLAINT.	0.30
06/04/24	BGR	PREPARE FOR AND ATTEND TEAM CALL	0.60
06/04/24	BGR	ATTEND TO RESPONSE TO DONOFF COUNSEL AND FOLLOW-UP ON SAME	0.70
06/04/24	BGR	WORK ON DRAFT REPORT	0.90
06/04/24	GCG	ADDRESS ISSUES REGARDING SETTLEMENT AGREEMENTS AND DRAFTING CONSIDERATIONS (.2); EMAILS TO/FROM CLIENT TEAM REGARDING COMPANION CASE FILING (.1); STRATEGY WITH B. RICH REGARDING PENDING MATTERS AND NEXT STEPS REGARDING BREACH OF SETTLEMENT AGREEMENT (.2)	0.50
06/04/24	MJN	CORRESPOND WITH R. SCHINDLER REGARDING	0.20

F E E S

Date	Attorney	Description	Hours
		NOTICE OF DEFAULT.	
06/04/24	MJN	CORRESPOND WITH P. BECK REGARDING SETTLEMENT AND FINANCIAL STATEMENTS.	0.40
06/04/24	MJN	FURTHER REVISE FOURTH REPORT; CORRESPOND WITH D. STERMER REGARDING THE SAME.	0.40
06/04/24	MJN	ATTEND EXPERT WITNESS INTERVIEW.	0.60
06/04/24	MJN	ATTEND CONFERENCE CALL WITH BERGER SINGERMAN TEAM AND DSI TEAM.	0.60
06/05/24	BGR	RESPOND TO CREDITOR INQUIRES	0.70
06/05/24	MJN	PREPARE FOR INTERVIEW WITH ██████████ CORRESPONDENCE REGARDING THE SAME.	0.50
06/05/24	MJN	FINALIZE FOURTH RECEIVER'S REPORT.	0.40
06/05/24	MJN	MEETING WITH POTENTIAL EXPERT WITNESS; FOLLOW UP REGARDING THE SAME.	0.80
06/06/24	BGR	WORK ON DISTRIBUTION ANALYSIS ISSUES	0.80
06/06/24	KLB	REVIEW EMAILS REGARDING FILING OF FOURTH RECEIVER'S REPORT AND REVISE AND FINALIZE REPORT	0.30
06/06/24	KLB	REVISE AND FINALIZE RECEIVER'S FOURTH REPORT, COMPILE EXHIBITS AND FORMAT AND E-FILE SAME (.3); PREPARE VERSION OF REPORT WITH LIVE LINKS TO PRIOR REPORTS FOR POSTING ON CASE WEBSITE (.3); EMAILS TO AND FROM RECEIVER REGARDING REPORT (.1)	0.70
06/06/24	KLB	EMAILS TO AND FROM PROCESS SERVER REGARDING STATUS OF SERVICE OF PROCESS UPON VARIOUS DEFENDANTS AND FILING OF RETURNS OF NON-SERVICE	0.20
06/06/24	MJN	FURTHER REVIEW AND REVISE FOURTH REPORT. CORRESPOND WITH D. STERMER REGARDING THE SAME.	0.40
06/06/24	MJN	PREPARE FOR INTERVIEW WITH ██████████	0.80
06/06/24	MJN	REVIEW STATUS OF SUMMONSES;	0.40
06/06/24	MJN	REVIEW CLOUD 9 INFORMATION REGARDING A. DICEMBRINO AND D. TEPPER.	1.10
06/07/24	KLB	REVIEW EMAIL REGARDING SCHEDULING OF MEDIATION REGARDING SUSSMAN ADVERSARY PROCEEDING, AND EMAILS REGARDING STATUS OF SERVICE OF PROCESS AND SERVICE OF SUMMONSES	0.40

F E E S

<u>Date</u>	<u>Attorney</u>	<u>Description</u>	<u>Hours</u>	
06/07/24	GCG	CONFIDENTIAL INTERVIEW WITH ██████████ WITH M. NILES [1.0 NO CHARGE]	0.00	N/C
06/07/24	MJN	MEET WITH ██████████ PREPARE SUMMARY REGARDING THE SAME.	1.50	
06/07/24	MJN	REVIEW NOTICE OF REMOVAL AND RESEARCH.	0.40	
06/07/24	MJN	REVIEW STATUS OF SUMMONSES; CORRESPOND WITH K.BURNS REGARDING ALIAS SUMMONSES FOR SEVERAL DEFENDANTS.	0.50	
06/08/24	GCG	REVIEW AND ANALYZE SUMMARY FROM M. NILES AND DRAFT FURTHER SUMMARY AND COMMENTS/ANALYSIS OF INTERVIEW WITH ██████████ TO D. STERMER AND CLIENT TEAM (.3); ANALYZE BROKER-DEALER EXCEPTIONS LAWS AND REGULATIONS REGARDING SAME (.3)	0.60	
06/10/24	MJN	CORRESPOND WITH W. DIAB REGARDING D. TEPPER AND A. DICEMBRINO COMPLAINTS; RESEARCH REGARDING THE SAME.	0.80	
06/12/24	MJN	CORRESPOND WITH D. STERMER REGARDING J. PALUZZI SETTLEMENT; REVIEW AGREEMENT.	0.30	
06/12/24	MJN	REVIEW AND FURTHER REVISE PALUZZI AGREEMENT.	0.40	
06/12/24	MJN	REVIEW QUESTIONS POSED BY TENANTS; CORRESPOND WITH D. STERMER REGARDING THE SAME.	0.30	
06/12/24	MJN	REVIEW ALIAS SUMMONS; CORRESPOND WITH TEAM REGARDING AMENDED COMPLAINT.	1.20	
06/13/24	BGR	ATTEND TO PENDING SETTLEMENT ISSUES	0.60	
06/13/24	BGR	RESPOND TO CREDITOR INQUIRES	0.40	
06/13/24	KLB	EMAILS REGARDING ALIAS SUMMONSES AND EMAILS TO AND FROM PROCESS SERVER REGARDING SERVICE OF ALIAS SUMMONSES UPON D. CUCUIAT AND S. GENAD (.3); REVIEW DOCKET AND EMAILS TO AND FROM PROCESS SERVER REGARDING UPON K. SKIDMORE, AND FINALIZE AND SUBMIT ALIAS SUMMONS FOR ISSUANCE (.3)	0.60	
06/13/24	MJN	REVIEW AND REVISE CARLOMAGNO SETTLEMENT.	0.30	
06/17/24	KLB	REVIEW EMAILS FROM CLAIMANT REQUESTING STATUS OF CASE, AND BRIEF DISCUSSION WITH M. NILES	0.10	
06/17/24	KLB	DISCUSSIONS WITH M. NILES REGARDING STATUS OF SETTLEMENTS WITH J. PALUZZI AND D.	0.00	N/C

F E E S

Date	Attorney	Description	Hours	
		CARLOMAGNO [.1 NO CHARGE]		
06/17/24	MJN	REVIEW EMAILS FROM D. CANNIZZO; RESEARCH REGARDING THE SAME.	0.30	
06/18/24	BGR	TEAM STATUS CALL AND FOLLOW-UP ON E-DISCOVERY ISSUES	1.30	
06/18/24	MJN	CONFERENCE CALL WITH DSI TEAM TO DISCUSS STRATEGY AND OUTSTANDING INSURANCE SUBPOENAS; FOLLOW UP WITH K.BURNS. [1.2 NO CHARGE]	0.00	N/C
06/19/24	MJN	REVIEW SUBPOENAS PREVIOUSLY ISSUED TO INSURANCE COMPANIES AND RESPONSES; FOLLOW UP WITH T. CARUSO REGARDING THE SAME.	0.60	
06/20/24	KLB	DISCUSSIONS WITH M. NILES REGARDING SUBPOENAS TO LIFE INSURANCE COMPANIES AND REVIEW PRIOR COMMUNICATIONS WITH SECURITY LIFE OF DENVER	0.60	
06/20/24	MJN	REVIEW MEDIATION INVOICE FROM PETER KING AND ADVISE.	0.30	
06/24/24	BGR	FOLLOW-UP ON PENDING CASES AGAINST BROKER AND REVIEW IB DOCUMENTS	0.60	
06/24/24	KLB	REVIEW EMAILS FROM PROCESS SERVER REGARDING STATUS OF SERVICE OF PROCESS UPON MULTIPLE DEFENDANTS, AND UPDATE MASTER WORK IN PROCESS CHART	0.60	
06/24/24	MJN	RESEARCH IN CLOUD 9 REGARDING A. DICEMBRINO AND D. EMMETS.	2.00	
06/24/24	MJN	REVIEW DOCUMENTS PROVIDED BY [REDACTED]	0.80	
06/24/24	MJN	CORRESPOND WITH P.BECK, M.WILDER REGARDING COMPLAINT; REVIEW STATUS OF SERVICE ON OTHER DEFENDANTS;	1.00	
06/25/24	BGR	CALL WITH C. VERNON AND FOLLOW-UP ON SAME	0.30	
06/25/24	MJN	CORRESPOND WITH C. MAURO REGARDING M. WILDER.	0.30	
06/26/24	BGR	WORK ON OPEN MEDIATION ISSUES	0.90	
06/26/24	BGR	WORK ON DEMAND LETTER RESPONSES	0.90	
06/26/24	KLB	REVIEW DOCKET OF CASE AGAINST J. SUSSMAN, ETC. AND UPDATE CHART MASTER WORK IN PROGRESS CHART TO REFLECT STATUS OF SERVICE OF SUMMONSES (.4); EMAILS TO AND FROM PROCESS SERVER REGARDING STATUS OF SERVICE ATTEMPTS UPON D. CUCUIAT, K. SKIDMORE AND S. GENAD (.2)	0.60	

F E E S

Date	Attorney	Description	Hours	
06/26/24	MJN	REVIEW EVERLAW AGREEMENT; PROVIDE GENERAL ANALYSIS.	1.00	
06/27/24	BGR	ATTEND TO OPEN MEDIATION MATTERS	0.80	
06/27/24	KLB	REVIEW EMAILS FROM PROCESS SERVER REGARDING SERVICE ATTEMPTS ON KIM SKIDMORE; UPDATE MASTER WORK IN PROGRESS CHART AND CONDUCT RESEACH REGARDING ADDRESSES FOR S. GENAD (.7); EMAILS TO M. NILES AND B. RICH AND EMAILS TO AND FROM PROCESS SERVER REGARDING ADDITIONAL SERVICE ADDRESS (.2)	0.90	
06/27/24	GCG	ANALYZE CLAIMS AGAINST PELICAN CAPITAL (.2); CLIENT EMAILS REGARDING NEXT STEPS IN LITIGATION (.3); DRAFT EMAIL TO COUNSEL FOR PELICAN CAPITAL REGARDING MEDIATION AND INVESTIGATE MEDIATOR'S AVAILABILITY FOR MEDIATION (.7)	1.20	
06/27/24	MJN	REVIEW SERVICE ISSUES RELATED TO S. GENAD AND OTHERS; RESEARCH REGARDING THE SAME.	1.70	
06/28/24	BGR	REVIEW SUSSMAN MOTION TO DISMISS [.9 NO CHARGE]	0.00	N/C
06/28/24	MJN	REVIEW MOTION TO DISMISS FILED BY J. SUSSMAN; CORRESPOND WITH TEAM REGARDING THE SAME.	1.00	
06/28/24	MJN	CORRESPOND WITH C. MAURO REGARDING M.WILDER. REVIEW COMPLAINT REGARDING THE SAME.	0.60	
06/29/24	MJN	RESEARCH REGARDING CASES CITED IN MOTION TO DISMISS	1.00	
07/01/24	BGR	REVIEW CLAIM PROCEDURE MOTIONS FOR PREPARATION	0.90	
07/01/24	BGR	ATTEND TO DONOFF DEFAULT RELATED ISSUES	0.40	
07/01/24	BGR	STRATEGY DISCUSSIONS AND REVIEW AND EDIT DONOFF COMPLAINT	0.70	
07/01/24	KLB	EMAILS AND DISCUSSIONS WITH M. NILES REGARDING SUBPOENAS AND DOCUMENTS PRODUCED (.3); REVIEW SUBPOENA TRACKER AND MASTER WORK IN PROGRESS CHART AND DOWNLOAD NOTICE OF SERVICE BY PROCESS SERVER OF SUBPOENAS SERVED VIA FLORIDA CHIEF FINANCIAL OFFICER (.4)	0.70	
07/01/24	MJN	REVIEW MOTION TO DISMISS FILED BY SUSSMAN.	0.60	
07/01/24	MJN	REVIEW INSURANCE SUBPOENA TRACKER; REVIEW PRIOR SUBPOENAS AND CORRESPONDENCE; FOLLOW	1.20	

F E E S

Date	Attorney	Description	Hours	
		UP WITH K.BURNS REGARDING THE SAME.		
07/01/24	WOD	DISCUSS STRATEGY FOR RESPONSE TO MOTION TO DISMISS WITH MAX SAWYER. [.2 NO CHARGE]	0.00	N/C
07/01/24	MS	DISCUSSION WITH W. DIAB RE SUSSMAN MOTION TO DISMISS AND RESPONSE IN OPPOSITION [.3]; REVIEW AMENDED COMPLAINT [.3]	0.60	
07/02/24	BGR	PREPARE FOR AND ATTEND CALL ON SUSSMAN MOTION TO DISMISS PREPARATION	0.90	
07/02/24	BGR	CALL WITH CHRIS VERNON ON STATUS OF CASE	0.30	
07/02/24	BGR	REVIEW CLAIM/DISTRIBUTION MOTION FOR EDITS	0.90	
07/02/24	KLB	REVIEW DOCUMENTS PRODUCED BY AXA EQUITABLE AND COMPARE TO SUBPOENA TRACKER OF MISSING DOCUMENTS (.5); GATHER CERTAIN DOCUMENTS PRODUCED BY AXA RELATING TO VARIOUS INSUREDS AND EMAIL TO M. NILES (.3)	0.80	
07/02/24	KLB	REVISE COMPLAINT AGAINST R. DONOFF AND GATHER AND COMPILE EXHIBITS TO SAME (0.6); EMAILS TO B. RICH AND M. NILES (0.1)	0.70	
07/02/24	KLB	EMAILS FROM PROCESS SERVER REGARDING SERVICE ON K. SKIDMORE AND EMAILS TO B. RICH AND M. NILES	0.20	
07/02/24	GCG	ANALYZE AND STRATEGIZE WITH BSLLP TEAM REGARDING OUTLINE FOR RESPONSIVE ARGUMENTS TO MOTION TO DISMISS FILED BY SUSSMAN (.8); EMAILS TO/FROM PETER KING AND COUNSEL FOR PELICAN REGARDING MEDIATION (.2); CLIENT EMAILS REGARDING SAME (.2)	1.20	
07/02/24	MJN	CORRESPOND WITH G.GAUKROGER AND TEAM REGARDING MOTION TO DISMISS; RESEARCH REGARDING MOTION TO DISMISS	1.00	
07/02/24	MJN	CORRESPOND WITH C. MAURO REGARDING M. WILDER; REVIEW CLAIMS AGAINST M. WILDER AND RESEARCH REGARDING THE SAME.	2.00	
07/02/24	MJN	CORRESPOND WITH P.BECK REGARDING COMPLAINT AND RESPONSE	0.20	
07/02/24	MJN	REVIEW DONOFF SETTLEMENT AGREEMENT; REVIEW AND REVISE COMPLAINT/ CONSENT JUDGMENT.	0.60	
07/02/24	MJN	CORRESPOND WITH G. GAUKROGER REGARDING PELICAN MEDIATION; REVIEW PELICAN COMPLAINT. [.5 NO CHARGE]	0.00	N/C
07/02/24	MJN	REVIEW MOTION TO DISMISS CASES IN SUSSMAN.	0.60	

F E E S

<u>Date</u>	<u>Attorney</u>	<u>Description</u>	<u>Hours</u>	
07/02/24	WOD	CALL WITH LITIGATION COUNSEL RE: RESPONSE TO SUSSMAN MOTION TO DISMISS STRATEGY.	0.50	
07/02/24	MS	ATTEND TEAM MEETING TO DISCUSS MOTION TO DISMISS AND OUTLINE OF RESPONSE IN OPPOSITION [.9]; PREPARE AND DRAFT FORMAL OUTLINE OF RESPONSE IN OPPOSITION BASED ON TEAM'S COLLECTIVE FEEDBACK FROM MEETING [.6]. [1.5 NO CHARGE]	0.00	N/C
07/03/24	BGR	STRATEGY CALLS RELATED TO DONOFF AND NEXT STEPS IN DRAFT COMPLAINT.	0.80	
07/03/24	BGR	ATTEND TO ISSUES RELATED TO CLAIMS AGAINST PELICAN AND MEDIATION OF SAME	0.50	
07/03/24	KLB	PREPARE SUMMONS FOR ISSUANCE BY CLERK UPON R. DONOFF AND EMAILS REGARDING FILING OF COMPLAINT	0.40	
07/03/24	KLB	REVIEW DOCUMENTS PRODUCED BY THE LINCOLN NATIONAL LIFE, COLUMBUS LIFE, PACIFIC LIFE, PHL VARIABLE, AND COMPARE AGAINST SUBPOENA TRACKER (1.3); MULTIPLE EMAILS TO REPRESENTATIVES OF EACH LIFE INSURANCE COMPANY REGARDING MISSING DOCUMENTS (.4)	1.70	
07/03/24	KLB	REVIEW AND RESPOND TO EMAIL FROM REPRESENTATIVES OF THE LINCOLN NATIONAL LIFE AND PHL VARIABLE REGARDING DOCUMENT PRODUCTION	0.20	
07/03/24	MJN	REVIEW CORRESPONDENCE AND PRIOR SUBPOENAS.	0.80	
07/05/24	BGR	RECEIPT AND REVIEW OF ORDER DISMISSING CLAIMS AGAINST TELEIOS	0.80	
07/05/24	MJN	CORRESPOND WITH TEAM REGARDING R. DONOFF; REVIEW DOCKET AND SETTLEMENT AGREEMENT	0.40	
07/06/24	BGR	REVIEW AND ATTEND TO TELEIOS ORDER ENTERED BY JUDGE HARPER	0.40	
07/07/24	KLB	REVISE COMPLAINT TO BE FILED AGAINST R. DONOFF AND REVISE SUMMONS; COMPILE EXHIBITS TO COMPLAINT AND EMAILS TO AND FROM M. NILES (.4); FORMAT AND COMPILE EXHIBIT TO COMPLAINT AND E-FILE COMPLAINT AND SUBMIT SUMMONS FOR ISSUANCE BY THE CLERK (.3)	0.70	
07/07/24	MJN	REVIEW AND REVISE COMPLAINT AGAINST R. DONOFF;	0.70	
07/08/24	BGR	ATTEND TO PELICAN AND M. WILDER MEDIATION ISSUES	0.60	

F E E S

Date	Attorney	Description	Hours	
07/08/24	BGR	WORK ON DISTRIBUTION ANALYSIS ISSUES	0.80	
07/08/24	BGR	ATTEND TO DONOFF COMPLAINT AND SERVICE ISSUES [.7 NO CHARGE]	0.00	N/C
07/08/24	KLB	REVIEW RESPONSES TO MULTIPLE EMAILS TO LIFE INSURANCE COMPANIES REGARDING DOCUMENTS NOT INCLUDED IN PRODUCED DOCUMENTS, AND EMAILS TO T. CARUSO REGARDING RESPONSES RECEIVED	0.40	
07/08/24	KLB	REVIEW DOCUMENTS FROM AND EMAILS TO REPRESENTATIVE OF AXA EQUITABLE REGARDING MISSING DOCUMENTS, AND EMAILS TO T. CARUSO REGARDING SAME	0.60	
07/08/24	KLB	MULTIPLE EMAILS FROM AND TO T. CARUSO REGARDING RESPONSES TO DOCUMENT REQUESTS AND UPDATE SUBPOENA TRACKER REGARDING SAME	0.40	
07/08/24	GCG	WORK ON MEDIATION EFFORTS AND RELATED CLIENT EMAILS AND EMAILS WITH MEDIATOR REGARDING PELICAN MATTER	0.20	
07/09/24	BGR	PREPARE FOR AND ATTEND TEAM STATUS CALL/ WELLS/SUSSMAN/DONOFF	1.30	
07/09/24	BGR	ATTEND TO DONOFF SUMMONS AND ACCEPTANCE ISSUES	0.40	
07/09/24	BGR	WORK ON ESI ISSUES	0.80	
07/09/24	KLB	PREPARE CORRESPONDENCE TO TRANSAMERICA LIFE INSURANCE CO. REGARDING SUBPOENED DOCUMENTS, ETC. (.4); FINALIZE LETTER AND GATHER SUBPOENA AND NOTICE OF SERVICE OF PROCESS (.3)	0.70	
07/09/24	KLB	TELEPHONE CONFERENCE WITH PALM BEACH CIRCUIT COURT CLERK REGARDING COMPLAINT FILED AGAINST R. DONOFF	0.20	
07/09/24	KLB	EMAILS REGARDING ISSUANCE OF SUMMONS AND SERVICE UPON R. SCHINDLER (.1); PREPARE NOTICE OF ACCEPTANCE OF SERVICE AND EMAILS TO TEAM (.4); EMAIL TO R. SCHINDLER WITH ISSUED SUMMONS, REVISE, FINALIZE, FORMAT AND E-FILE NOTICE OF ACCEPTANCE, AND EMAIL TO R. SCHINDLER WITH FILED NOTICE (.3)	0.80	
07/09/24	KLB	PREPARE AMENDED NOTICE OF ACCEPTANCE OF SERVICE AND FINALIZE, FORMAT AND E-FILE SAME; EMAIL TO R. SCHINDLER	0.30	
07/09/24	GCG	ATTENTION TO SUMMONS AND SERVICE OF SAME ON	0.30	

F E E S

Date	Attorney	Description	Hours	
		DONOFF COUNSEL AND RELATED FILING OF NOTICE OF ACCEPTANCE OF SERVICE		
07/09/24	GCG	STRATEGY CONFERENCE WITH RECEIVER, DSI, AND BERGER SINGERMAN [1.5 NO CHARGE]	0.00	N/C
07/09/24	MJN	ATTEND TEAM CONFERENCE CALL WITH D. STERMER REGARDING OUTSTANDING ISSUES AND STRATEGY. FOLLOW UP REGARDING THE SAME. [1.8 NO CHARGE]	0.00	N/C
07/09/24	MJN	REVIEW PROPOSED NOTICE OF COMPLIANCE AND AMENDED NOTICE; FOLLOW UP WITH TEAM REGARDING THE SAME.	0.40	
07/09/24	MJN	CONFERENCE CALL WITH R. KOBERT REGARDING MEDIATION; FOLLOW UP WITH OPPOSING COUNSEL AND TEAM REGARDING THE SAME	0.70	
07/09/24	WOD	COMMENCE ANALYZING SUSSMAN MOTION TO DISMISS TO PREPARE RESPONSE STRATEGY.	1.50	
07/10/24	BGR	ATTEND STATUS CALL WITH CLIENT	0.50	
07/10/24	KLB	TELEPHONE CALL WITH CLERK REGARDING REASSIGNMENT OF STERMER V. DONOFF CASE TO JUDGE HARPER AND EMAILS TO AND FROM G. GAUKROGER AND M. NILES REGARDING SAME	0.30	
07/10/24	GCG	RESEARCH AND DRAFT MOTION FOR COURT APPROVAL FOR COST-SHARING AND COMMON INTEREST PRIVILEGE PURPOSES AND RELATED EMAILS AND REVIEW OF COMMENTS FROM TEAM	1.40	
07/10/24	MJN	CORRESPOND WITH R. KOBERT REGARDING MEDIATION.	0.30	
07/10/24	MJN	CORRESPOND WITH K.BURNS REGARDING TRANSFER OF DONOFF CASE. [6 NO CHARGE]	0.00	N/C
07/11/24	BGR	FOLLOW-UP ON CLAIMS AND MEDIATIONS FOR NEXT WAVE OF LITIGATION	0.90	
07/11/24	KLB	REVIEW ADDITIONAL EMAILS REGARDING SERVICE ATTEMPTS ON K. SKIDMORE AND PREPARE EMAIL TO B. RICH AND M. NILES REGARDING SERVICE ATTEMPTS	0.20	
07/11/24	GCG	ANALYZE ISSUES REGARDING VANTAGE AND RELATED CLIENT EMAILS (.2)	0.20	
07/11/24	MJN	PREPARE FOR AND ATTEND CALL WITH R.KOBERT REGARDING MEDIATION. [.5 NO CHARGE]	0.00	N/C
07/11/24	WOD	CONTINUE ANALYZING SUSSMAN MOTION TO DISMISS AND CASE LAW CITED THEREIN TO PREPARE RESPONSE.	3.00	

F E E S

<u>Date</u>	<u>Attorney</u>	<u>Description</u>	<u>Hours</u>	
07/12/24	MJN	CORRESPOND WITH TEAM REGARDING M.WILDER MEDIAITON. [.3 NO CHARGE]	0.00	N/C
07/12/24	WOD	RESEARCH FLORIDA CASE LAW RE: RECEIVERSHIP STANDING; IN PARI DELICTO DEFENSE; KNOWLEDGE ELEMENTS OF AIDING AND ABETTING; WHETHER AIDING AND ABETTING IS A CAUSE OF ACTION; AND PLEADING STANDARD FOR FUFTA CLAIMS; AND LAW ON INCORPORATION BY REFERENCE.	4.50	
07/12/24	WOD	COMMENCE DRAFTING RESPONSE TO SUSSMAN'S MOTION TO DISMISS.	2.00	
07/15/24	WOD	CONTINUE RESEARCHING FLORIDA AND FEDERAL CASE LAW RE: RECEIVERSHIP STANDING; IN PARI DELICTO DEFENSE; KNOWLEDGE ELEMENTS OF AIDING AND ABETTING; WHETHER AIDING AND ABETTING IS A CAUSE OF ACTION; AND PLEADING STANDARD FOR FUFTA CLAIMS; AND LAW ON INCORPORATION BY REFERENCE.	4.00	
07/15/24	MS	DISCUSSION WITH G. GAUKROGER RE OUTLINE OF RESPONSE IN OPPOSITION TO MOTION TO DISMISS	0.10	
07/16/24	KLB	REVIEW EMAIL REGARDING SCHEDULING OF MEDIATION BETWEEN RECEIVER AND M. WILDER AND PREPARE NOTICE OF MEDIATION, AND; EMAILS TO AND FROM M. NILES	0.50	
07/16/24	KLB	FINALIZE, FORMAT AND E-FILE NOTICE OF MEDIATION REGARDING MEDIATION WITH M. WILDER AND EMAILS TO COUNSEL AND MEDIATOR REGARDING SAME	0.30	
07/16/24	KLB	EMAILS FROM G. GAUKROGER REGARDING UPCOMING MEDIATION IN PELICAN CASE AND PREPARE NOTICE OF MEDIATION FOR SAME	0.60	
07/16/24	KLB	REVIEW EMAIL FROM M. MURPHY OF PHL VARIABLE REGARDING PREMIUM INFORMATION AND COMMISSION INFORMATION FOR VARIOUS POLICIES; EMAILS TO T. CARUSO AND UPDATE SUBPOENA TRACKER	0.30	
07/16/24	KLB	FINALIZE, FORMAT AND E-FILE NOTICE OF MEDIATION AND PREPARE FOR SERVICE; EMAILS TO MEDIATOR	0.40	
07/16/24	GCG	REVIEW/REVISE NOTICE OF MEDIATION REGARDING PELICAN MEDIATION	0.20	
07/16/24	MJN	CORRESPOND WITH D. CUCUIAT REGARDING COMPLAINT AND SETTLEMENT. RESEARCH REGARDING THE SAME.	0.60	

F E E S

Date	Attorney	Description	Hours	
07/16/24	MJN	ATTEND TEAM CALL REGARDING CASE STATUS.	1.00	
07/16/24	WOD	DRAFT RESPONSE IN OPPOSITION TO SUSSMAN'S MOTION TO DISMISS.	6.50	
07/16/24	WOD	ATTEND CALL WITH RECEIVER, DSI, AND LITIGATION TEAM RE: LEGAL STRATEGY FOR SEVERAL ONGOING LAWSUITS, MEDIATIONS, AND DISCOVERY.	1.00	
07/16/24	MS	ATTEND TEAM MEETING TO DISCUSS PENDING TASKS AND DISTRIBUTION OF ASSIGNMENTS [.9 NO CHARGE]	0.00	N/C
07/17/24	KLB	REVIEW EMAILS FROM PROCESS SERVER REGARDING SERVICE ATTEMPTS ON K. SKIDMORE AND EMAILS TO TEAM REGARDING SAME	0.10	
07/17/24	MJN	REVIEW AND PROVIDE COMMENT TO MOTION TO DISMISS RESPONSE (SUSSMAN)	1.20	
07/17/24	MS	REVIEW AND EDIT RESPONSE IN OPPOSITION TO MOTION TO DISMISS [1.0]; DISCUSSION WITH W. DIABRE IN PARI DELICTO AFFIRMATIVE DEFENSE [.3]; RESEARCH ON IN PARI DELICTO AFFIRMATIVE DEFENSE [.2] [1.5 NO CHARGE]	0.00	N/C
07/18/24	BGR	WORK ON EVERLAW ISSUES AND ESI	0.80	
07/18/24	BGR	ATTEND TO DONOFF RELATED ISSUES AND PREPARE FOR NEXT STEPS	0.60	
07/18/24	BGR	ATTEND TO PELICAN MEDIATION PREPARATION ISSUES	0.40	
07/18/24	KLB	EMAILS FROM JUDICIAL ASSISTANT TO JUDGE HARPER REGARDING SPECIAL SET HEARINGS AND EMAILS TO TEAM REGARDING SAME	0.10	
07/18/24	MS	RESEARCH ON PROPRIETY OF MOVING TO DISMISS BASED ON PARI DELICTO AFFIRMATIVE DEFENSE	0.30	
07/19/24	MJN	CORRESPOND WITH C. MAURO REGARDING M.WILDER; REVIEW CLOUD 9 EMAILS; CORRESPOND WITH TEAM REGARDING THE SAME.	0.70	
07/19/24	WOD	REVIEW AND INCORPORATE COMMENTS FOR FROM M SAWYER AND M NILES TO RESPONSE TO SUSSMAN MOTION TO DISMISS.	0.50	
07/19/24	MS	RESEARCH ON IN PARI DELICTO DEFENSE -- CONSIDERATIONS FOR REVISING RESPONSE IN OPPOSITION TO MOTION TO DISMISS ADDRESSING SAME	1.50	
07/21/24	BGR	ATTEND TO CASE STATUS REVIEW ISSUES AND UPDATE TASK LIST	1.30	

F E E S

<u>Date</u>	<u>Attorney</u>	<u>Description</u>	<u>Hours</u>	
07/22/24	BGR	REVIEW RESPONSE TO SUSSMAN MOTION TO DISMISS	0.60	
07/22/24	BGR	WORK ON CLAIM RELATED ISSUES AND PENDING LITIGATION /MEDIATION ISSUES	0.90	
07/22/24	KLB	REVIEW EMAIL FROM D. GLENN OF AXA EQUITABLE AND DOWNLOAD SUPPLEMENTAL DOCUMENTS PRODUCED (.2); EMAILS TO T. CARUSO WITH PREMIUM PAYMENT HISTORY REPORT RECEIVED AND UPDATE SUBPOENA TRACKER (.2)	0.40	
07/22/24	MS	REVISE AND EDIT RESPONSE IN OPPOSITION TO MOTION TO DISMISS, FOCUSING PRIMARILY ON IN PARI DELICTO ARGUMENT	0.80	
07/22/24	MS	DISCUSSION WITH G. GAUKROGER RE MEDIATION STATEMENT [.2 NO CHARGE]	0.00	N/C
07/23/24	GCG	REVIEW AND REVISE DRAFT RESPONSE TO MOTION TO DISMISS FILED BY DEFENDANT SUSSMAN AND RELATED EMAILS WITH BERGER SINGERMAN TEAM AND CLIENT TEAM REGARDING SAME	3.40	
07/23/24	WOD	INCORPORATE LITIGATION TEAM COMMENTS TO RESPONSE TO SUSSMAN MOTION TO DISMISS AND SHARE WITH RECEIVER.	0.50	
07/23/24	MS	REVIEW AND ANALYZE G. GAUKROGER'S COMMENTS AND EDITS TO RESPONSE IN OPPOSITION TO MOTION TO DISMISS	0.00	N/C
07/24/24	BGR	ATTEND TO SUSSMAN MOTION TO DISMISS AND DONOFF RELATED ISSUES	1.00	
07/24/24	GCG	ASSIST M. SAWYER WITH PREPARATION AND ISSUES ANALYSIS FOR MEDIATION STATEMENT FOR PELICAN CASE MEDIATION [.2 NO CHARGE]	0.00	N/C
07/24/24	MJN	CORRESPOND WITH TEAM REGARDING SCHEDULED MEDIATIONS AND NEXT STEPS. [.7 NO CHARGE]	0.00	N/C
07/24/24	MJN	CORRESPOND WITH M.SAWYER REGARDING PELICAN MEDIATION STATEMENT [.4 NO CHARGE]	0.00	N/C
07/24/24	MJN	REVIEW DONOFF SETTLEMENT AGREEMENT; CORRESPOND WITH K.BURNS REGARDING CONSENT JUDGMENT AND AFFIDAVIT.	0.40	
07/24/24	MS	REVIEW COMPLAINT, DEMAND LETTER, EMAILS EXCHANGED BETWEEN COUNSEL WITH PELICAN, AND FINANCIAL ANALYSIS FROM T. CARUSO -- CONSIDERATIONS FOR PREPARING MEDIATION STATEMENT	2.30	
07/25/24	BGR	ATTEND TO MELODY WILDER MEDIATION ISSUES/REVIEW	0.80	

F E E S

<u>Date</u>	<u>Attorney</u>	<u>Description</u>	<u>Hours</u>
07/25/24	BGR	REVIEW TELEIOS MOTION TO DISMISS	0.80
07/25/24	KLB	REVIEW EMAIL FROM CSC REGARDING REGISTERED AGENT SERVICES AND OUTSTANDING INVOICES FOR TWO CENTURION ENTITIES AND EMAILS TO AND FROM D. STERMER REGARDING SAME; RESPOND TO EMAIL FROM CSC REPRESENTATIVE	0.20
07/25/24	KLB	REVIEW EMAIL FROM T. CARUSO REGARDING PHL VARIABLE DOCUMENT PRODUCTION AND PREPARE SUBPOENA TO SAME (.4); PREPARE NOTICE OF INTENT TO SERVICE SUBPOENA AND EMAILS TO AND FROM PHL VARIABLE REPRESENTATIVE REGARDING ADDITIONAL DOCUMENT REQUESTS (.5); UPDATE SUBPOENA TRACKER REGARDING CURRENT STATUS OF REQUESTS TO PHL VARIABLE (.1)	1.00
07/25/24	KLB	EMAILS TO VARIOUS LIFE INSURANCE COMPANIES REGARDING STATUS OF REQUESTS FOR MISSING DOCUMENTS FROM PRIOR PRODUCTIONS	0.30
07/25/24	WOD	REVIEW CLOUD9 FOR EVIDENCE ON MELODY WILDER IN ANTICIPATION OF MEDIATION.	4.00
07/25/24	WOD	REVIEW MELODY WILDER ONLINE PROFILES TO PREPARE FOR MEDIATION.	0.30
07/26/24	BGR	WORK ON CLAIM ANALYSIS ISSUES	0.50
07/26/24	BGR	REVIEW EZRINE PLEADINGS AND MOTION TO DISMISS FILED BY TELEIOS AND CALLS ON SAME	0.50
07/26/24	BGR	ATTEND TO ISSUES RELATED TO SUSSMAN AND DONOFF CLAIMS/LITIGATION	0.80
07/26/24	MJN	RESEARCH REGARDING CLAIMS PROCEDURE DISTRIBUTION MOTIONS.	0.40
07/26/24	WOD	RECEIPT AND REVIEW OF COMMENTS TO RESPONSE TO MOTION TO DISMISS FROM RECEIVER.	0.50
07/26/24	MS	REVIEW D. STERMER'S COMMENTARY ON OPPOSITION TO MOTION TO DISMISS (.2); REVIEW EMAIL DISCUSSION BETWEEN D. STERMER AND COUNSEL RE CONSIDERATIONS FOR FILING OPPOSITION (.2)	0.40
07/29/24	BGR	REVIEW DONOFF RESPONSE/MOTION	0.70
07/29/24	KLB	EMAILS REGARDING SERVICE ON DEFENDANTS IN CASE AGAINST J. SUSSMAN AND OTHER ADVISORS AND PREPARE EMAIL TO W. DIAB REGARDING STATUS	0.60
07/29/24	MJN	REVIEW MOTION TO SET ASIDE SETTLEMENT AGREEMENT FILED BY R. DONOFF	0.50

F E E S

<u>Date</u>	<u>Attorney</u>	<u>Description</u>	<u>Hours</u>	
07/29/24	MJN	REVIEW STATUS OF SH AGENT COMPLAINTS AND SERVICE; FOLLOW UP REGARDING INSURANCE SUBPOENAS; REVIEW PRIOR EMAILS REGARDING THE SAME.	1.00	
07/30/24	BGR	REVIEW AND STRATEGIZE ON DONOFF ISSUES	0.90	
07/30/24	BGR	MEDIATION PREPARATION WORK	1.20	
07/30/24	KLB	PREPARE EMAIL TO W. DIAB REGARDING SERVICE ATTEMPTS ON D. KUTNER, S. GENAD AND K. SKIDMORE AND GATHER EMAILS FROM PROCESS SERVER REGARDING SERVICE ATTEMPTS	0.70	
07/30/24	KLB	EMAILS FROM REPRESENTATIVE OF PHL VARIALBE REGARDING ADDITIONAL DOCUMENTS PRODUCED AND EMAILS TO T. CARUSO REGARDING SAME; UPDATE SUBPOENA TRACKER	0.30	
07/30/24	MJN	CORRESPOND WITH M.SAWYER AND W.DIAB REGARDING MEDIATION STATEMENTS.	0.40	
07/30/24	MJN	CORRESPOND WITH K.APPLEBY REGARDING PALUZZI.	0.20	
07/30/24	MJN	FOLLOW UP WITH TEAM REGARDING STATUS OF SH AGENT COMPLAINT.	0.60	
07/31/24	BGR	PREPARE FOR AND ATTEND CALL WITH OFR ON DONOFF MOTION AND RESPONSE	0.90	
07/31/24	BGR	WORK ON DONOFF RESPONSE	1.20	
07/31/24	BGR	WORK ON CLAIM PROCESS ISSUES	0.50	
07/31/24	BGR	REVIEW PELICAN MEDIATION STATEMENT [.8 NO CHARGE]	0.00	N/C
07/31/24	KLB	REVIEW AND RESPOND TO EMAILS FROM M. MURPHY OF PHL VARIABLE REGARDING PRODUCTION OF DOCUMENTS AND EMAILS TO M. NILES REGARDING SAME	0.20	
07/31/24	CC	PREPARE JOINT SCHEDULING REPORT AND PROPOSED PRETRIAL SCHEDULE FOR FILING. [.4 NO CHARGE]	0.00	N/C
07/31/24	MJN	ATTEND CONFERENCE CALL WITH B.RICH AND P.AVRON REGARDING CLAIMS PROCEDURE. CONDUCT RESEARCH REGARDING THE SAME. [.5 NO CHARGE]	0.00	N/C
07/31/24	MJN	CONFERENCE CALL WITH G. GAUKROGER AND B.RICH REGARDING UPCOMING DEADLINES. [.5 NO CHARGE]	0.00	N/C
07/31/24	MJN	REVIEW PRIOR SETTLEMENT AGREEMENT;	0.30	

F E E S

Date	Attorney	Description	Hours
		CORRESPOND WITH TEAM REGARDING J. PALUZZI.	
07/31/24	MJN	REVIEW CORRESPONDENCE FROM MELODY MURPHY REGARDING SUBPOENA; CORRESPOND WITH K.BURNS REGARDING THE SAME.	0.30
07/31/24	MJN	REVIEW MEDIATION STATEMENT WITH PELICAN.	0.60
07/31/24	MJN	CORRESPOND WITH W. DIAB REGARDING SERVICE OF PROCESS ON SH AGENTS; RESEARCH REGARDING THE SAME	0.30
07/31/24	WOD	ANALYZE SERVICE ATTEMPTS ON AMENDED COMPLAINT DEFENDANTS AND RESEARCH INFORMATION ON WHEREABOUTS FOR CONTINUED ATTEMPTED SERVICE.	1.50
07/31/24	WOD	COMMENCE DRAFTING MEDIATION STATEMENT FOR MELODY WILDER.	0.50
07/31/24	MS	DRAFT MEDIATION STATEMENT -- INCLUDING REVIEW PLEADINGS, DEMAND LETTER, EMAILS BETWEEN COUNSEL, AND DISCUSSION WITH G. GAUKROGER, AS DRAFTING CONSIDERATIONS	5.40
08/01/24	BGR	ATTEND TO DONOFF DRAFT RESPONSE ISSUES	0.80
08/01/24	BGR	REVIEW PELICAN MEDIATION STATEMENT	0.50
08/01/24	KLB	REVIEW EMAILS FROM W. DIAB REGARDING SERVICE OF SUMMONSES AND RESEARCH REGARDING BETTER ADDRESSES FOR VARIOUS DEFENDANTS	0.50
08/01/24	KLB	REVIEW ONLINE SCHEDULING PORTAL FOR SPECIAL SET HEARING DATES FOR HEARING ON MOTION TO DISMISS AND EMAILS TO AND FROM G. GAUKROGER REGARDING SAME	0.20
08/01/24	GCG	REVIEW AND REVISE DRAFT MEDIATION STATEMENT REGARDING PELICAN	1.20
08/01/24	MJN	REVIEW DOCUMENTS RELATED TO MELODY WILDER.	0.50
08/01/24	MJN	PREPARE MOTION TO STRIKE MOTION TO SET ASIDE.	2.50
08/01/24	WOD	DRAFT MEDIATION STATEMENT FOR MELODY WILDER.	5.00
08/01/24	MS	PHONE CALL WITH T. CARUSO RE MEDIATION STATEMENT	0.40
08/02/24	BGR	WORK ON DONOFF RESPONSE	0.90
08/02/24	BGR	CALL WITH CLIENT AND OFR	0.30
08/02/24	BGR	ATTEND TO PELICAN MEDIATION STATEMENT ISSUES	0.60
08/02/24	KLB	REVIEW ONLINE SCHEDULING PORTAL FOR	0.20

F E E S

Date	Attorney	Description	Hours	
		AVAILABLE HEARING DATES AND EMAILS TO TEAM REGARDING SAME		
08/02/24	MS	REVISE AND EDIT MEDIATION STATEMENT	0.50	
08/04/24	BGR	REVIEW AND EDIT MOTION TO STRIKE DONOFF MOTION	0.90	
08/05/24	BGR	ATTEND TO DONOFF RETATED DRAFTS	0.60	
08/05/24	KLB	REVIEW ONLINE SCHEDULING PORTAL REGARDING AVAILABLE SPECIAL SET HEARING DATES FOR HEARING ON MOTION TO DISMISS AND EMAILS TO AND FROM TEAM REGARDING SAME; EMAIL TO JUDICIAL ASSISTANT TO JUDGE HARPER REGARDING SPECIAL SET HEARINGS	0.30	
08/05/24	KLB	REVIEW PELICAN MEDIATION STATEMENT AND EMAILS FROM G. GAUKROGER (.1); GATHER EXHIBIT AND EMAILS TO AND FROM M. SAWYER (.2)	0.30	
08/05/24	GCG	REVIEW AND REVISE DRAFT RESPONSE TO MOTION TO STRIKE SETTLEMENT RE DONOFF (.8); REVIEW AND COMMENT REGARDING FINAL DRAFT OF MEDIATION STATEMENT FOR PELICAN MEDIATION (.2); ATTENTION RELATED ISSUES AND EMAILS REGARDING DONOFF ISSUES (.2)	1.20	
08/05/24	MJN	REVIEW AND REVISE MEDIATION STATEMENT FOR M. WILDER	0.80	
08/05/24	MS	REVIEW AND ANALYZE D. STERMER EDITS TO MEDIATION STATEMENT (.2); RESEARCH ON CHAPTER 726 AUTHORITY FOR INSERTS INTO MEDIATION STATEMENT [.6]	0.90	
08/06/24	BGR	FURTHER EDITS TO DONOFF REPLY	0.90	
08/06/24	BGR	ATTEND TEAM STATUS CALL	0.60	
08/06/24	PA	START RESEARCHING AND REVISING DRAFT CLAIMS PROCEDURE MOTION	2.40	
08/06/24	GCG	CLIENT STRATEGY CONFERENCE REGARDING PENDING MEDIATIONS AND LITIGATION MATTERS	0.50	
08/06/24	MJN	CORRESPOND WITH P.AVRON REGARDING CLAIMS PROCEDURE MOTION; REVIEW FILE AND DRAFT MOTION REGARDING THE SAME. [.8 NO CHARGE]	0.00	N/C
08/06/24	MJN	REVIEW AND REVISE MEDIATION STATEMENT WITH M.WILDER; FINALIZE AND CORRESPOND WITH D. STERMER REGARDING THE SAME.	1.20	
08/06/24	MJN	REVISE MOTION TO STRIKE MOTION TO SET ASIDE; CORRESPOND WITH G. GAUKROGER AND D. STERMER	0.40	

F E E S

Date	Attorney	Description	Hours	
		REGARDING THE SAME.		
08/06/24	MJN	FURTHER REVISE M. WILDER MEDIATION STATEMENT.	0.40	
08/07/24	BGR	FURTHER REVISIONS TO DONOFF MOTION	0.90	
08/07/24	KLB	GATHER CASES AND STATUTES CITED IN PELICAN MEDIATION STATEMENT AND EMAILS TO M. SAWYER; REVIEW EMAILS FROM G. GAUKROGER REGARDING SUBMISSION OF MEDIATION STATEMENT	0.50	
08/07/24	KLB	REVISE AND FINALIZE PELICAN MEDIATION STATEMENT AND COMPILE EXHIBITS TO SAME (.3); EMAILS FROM AND TO M. SAWYER REGARDING SUBMISSION (.1); DISCUSSIONS WITH M. NILES AND PREPARE EMAIL TRANSMITTAL TO MEDIATOR, P. KING WITH MEDIATION STATEMENT AND CASES AND STATUTES CITES (.2)	0.60	
08/07/24	KLB	REVIEW EMAIL FROM M. FERNANDEZ OF CSC REGARDING REGISTERED AGENT SERVICES AND PAYMENT OF INVOICES (.1); EMAILS FROM T. CARUSO WITH BACK UP FOR PAYMENT; EMAIL TO M. FERNANDEZ WITH BACK UP FOR PAYMENTS MADE BY RECEIVER (.1)	0.20	
08/07/24	PA	FOLLOW-UP RESEARCH AND FURTHER DRAFTING / REVISING CLAIMS RECONCILIATION MOTION	2.50	
08/07/24	GCG	ATTENTION TO FINALIZING PELICAN MEDIATION STATEMENT	0.20	
08/07/24	MJN	CORRESPOND WITH K.BURNS REGARDING FEE MOTION; REVIEW PRIOR FEE MOTION AND THIRD REPORT.	0.40	
08/07/24	MJN	FURTHER REVISE MOTION TO STRIKE MOTION TO SET ASIDE JUDGMENT.	0.80	
08/07/24	MJN	FINALIZE MEDIATION STATEMENT WITH MELODY WILDER. [.5 NO CHARGE]	0.00	N/C
08/07/24	MJN	CORRESPOND WITH TEAM REGARDING PELICAN MEDIATION STATEMENT.	0.30	
08/07/24	MS	FINALIZING MEDIATION STATEMENT AND ORGANIZING EXHIBITS FOR USE AT MEDIATION	0.70	
08/08/24	BGR	REVIEW AND REVISE MOTION TO STRIKE DONOFF AND RELATED PLEADINGS	1.30	
08/08/24	BGR	WORK ON M. WILDER MEDIATION PREPARATION ISSUES	0.90	
08/08/24	KLB	INITIAL PREPARATION OF MOTION FOR ENTRY OF	2.00	

F E E S

Date	Attorney	Description	Hours
		CONSENT JUDGMENT (1.0); REVIEW SETTLEMENT AGREEMENT WITH R. DONOFF, PREPARE AFFIDAVIT OF RECEIVER AND EMAILS TO M. NILES REGARDING SAME (1.0)	
08/08/24	KLB	PREPARE NOTICE OF FILING OF ANSWER, WAIVER OF DEFENSES AND CONSENT TO JUDGMENT OF DEFENDANT, RICHARD DONOFF (.4); EMAILS TO AND FROM M. NILES (.1)	0.50
08/08/24	MJN	PREPARE CONSENT JUDGMENT AND NOTICE OF FILING ANSWER; CORRESPOND WITH K.BURNS REGARDING THE SAME.	1.00
08/08/24	MJN	FINALIZE MEDIATION STATEMENT AND CORRESPOND WITH R.KOBERT AND C.MAURO.	0.30
08/08/24	MJN	FURTHER REVISE DONOFF RESPONSE, ANSWER, AND JUDGMENT.	0.70
08/09/24	BGR	FINAL REVISIONS TO DONOFF DRAFTS FOR FILING AND CALLS ON SAME	1.20
08/09/24	BGR	PELICAN MEDIATION PREPARATION ISSUES/RESPOND ON S. ORTH REPRESENTATION	0.80
08/09/24	BGR	PELICAN MEDIATION PREPARATION/REVIEW MEDIATION STATEMENT FROM PELICAN	1.20
08/09/24	KLB	DISCUSSIONS WITH TEAM REGARDING UPCOMING MEDIATIONS AND GATHER PLEADINGS FOR SAME (.3); PREPARE E-BINDER FOR PELICAN MEDIATION AND EMAILS TO TEAM (.7)	1.00
08/09/24	KLB	REVISE AND FINALIZE MOTION TO STRIKE PLEADING FILED BY R. DONOFF AND COMPILE EXHIBITS TO SAME (.6); FORMAT AND E-FILE MOTION TO STRIKE (.2)	0.80
08/09/24	KLB	REVISE AND FINALIZE NOTICE OF FILING ANSWER, WAIVER AND FORMAT AND E-FILE SAME (.4); REVISE AND FINALIZE MOTION FOR ENTRY OF CONSENT FINAL JUDGMENT AND COMPILE EXHIBITS TO SAME (.4); FORMAT AND E-FILE MOTION AND PREPARE FOR SERVICE UPON R. SCHINDLER (.3)	1.10
08/09/24	KLB	GATHER CASES CITED IN PELICAN'S EXCERPT FROM PELICAN'S SUBMISSION TO MEDIATOR AND CIRCULATE TO TEAM	0.30
08/09/24	GCG	REVIEW AND REVISE MOTION TO ENTER CONSENT JUDGMENT AGAINST DONOFF IN THE DONOFF ENFORCEMENT ACTION (1.2)	2.00
08/09/24	MJN	FINALIZE MOTION TO SET ASIDE SETTLEMENT RESPONSE AND ANSWER/CONSENT JUDGMENT;	1.80

F E E S

Date	Attorney	Description	Hours	
		CORRESPOND WITH G.GAUKROGER REGARDING THE SAME.		
08/09/24	MJN	PREPARE DRAFT SETTLEMENT AGREEMENT FOR PELICAN CAPITAL MEDIATION.	0.50	
08/09/24	MJN	REVIEW VOICEMAIL FROM C.SWEETAPPLE REGARDING FIFTH AVENUE PHYSICIANS SETTLEMENT. CORRESPOND WITH TEAM REGARDING THE SAME	0.40	
08/09/24	MS	REVIEW AND ANALYZE PELICAN'S MEDIATION STATEMENT (.3); RESEARCH ON IDENTITY OF ISSUES DOCTRINE AND REVIEW OF CASES CITED IN PELICAN'S MEDIATION STATEMENT RE SAME AND DRAFT EMAIL RE OVERVIEW TO COUNSEL(2.0)	2.30	
08/12/24	BGR	PREPARE FOR AND ATTEND PELICAN MEDIATION [3.3 NO CHARGE]	0.00	N/C
08/12/24	BGR	EDIT LETTER TO JUDGE HARPER ON DONOFF PLEADINGS	0.50	
08/12/24	KLB	PREPARE CORRESPONDENCE TO JUDGE HARPER WITH SUBMISSION OF CONSENT FINAL JUDGMENT REGARDING R. DONOFF; EMAILS TO AND FROM B. RICH	0.70	
08/12/24	KLB	FINALIZE AND FORMAT LETTER TO JUDGE HARPER WITH PROPOSED AGREED FINAL JUDGMENT AND FINALIZE PROPOSED JUDGMENT; SUBMIT LETTER AND PROPOSED ORDER TO COURT AND EMAILS TO R. SCHINDLER [.5 NO CHARGE]	0.00	N/C
08/12/24	GCG	REVISE DRAFT LETTER TO J. HARPER REGARDING ENTRY OF JUDGMENT AGAINST DONOFF	0.20	
08/12/24	GCG	PREPARE FOR AND ATTEND MEDIATION WITH PELICAN (3); RESEARCH RPCS AND RELATED EMAILS TO CLIENT AND B. RICH (.3); TELECONFERENCE WITH B. RICH (NC)	3.30	
08/12/24	MJN	ATTEND MEDIATION OF PELICAN CAPITAL MANAGEMENT; CORRESPOND WITH PETER KING REGARDING REQUESTED DOCUMENTS. [3.3 NO CHARGE]	3.30	
08/12/24	MJN	FINALIZE CONSENT JUDGMENT AND CORRESPONDENCE TO JUDGE.	0.30	
08/12/24	MJN	CORRESPOND WITH TEAM REGARDING SH AGENT COMPLAINT; FOLLOW UP REGARDING UNSERVED AGENTS; RESEARCH REGARDING THE SAME.	0.80	
08/13/24	MJN	CORRESPOND WITH C. MILLER REGARDING FIFTH	0.30	

F E E S

Date	Attorney	Description	Hours	
		AVENUE SETTLEMENT AGREEMENT/PAYMENT		
08/14/24	BGR	ATTEND TO FEE MOTION STATUS AND INITIAL WORK	0.40	
08/14/24	BGR	REVIEW DONOFF COURT SUBMISSION	0.30	
08/14/24	KLB	PREPARE EX PARTE MOTION TO EXTEND TIME TO SERVE PROCESS UPON MULTIPLE DEFENDANTS AND PREPARE PROPOSED ORDER GRANTING SAME	1.40	
08/14/24	MJN	PREPARE SETTLEMENT AGREEMENT AND CONSENT JUDGMENT FOR WILDER MEDIATION.	0.70	
08/15/24	BGR	WILDER MEDIATION PREPARATION ISSUES	0.60	
08/15/24	BGR	WILDER MEDIATION PREPARATION	0.40	
08/16/24	BGR	WILDER MEDIATION [2.2 NO CHARGE]	0.00	N/C
08/16/24	KLB	REVISE MOTION TO EXTEND TIME TO SERVE PROCESS UPON DEFENDANTS AND REVISE PROPOSED ORDER GRANTING SAME (.3); FORMAT AND E-FILE MOTION AND PREPARE COVER LETTER TO JUDGE HARPER WITH PROPOSED ORDER (.5)	0.80	
08/16/24	MJN	CORRESPOND WITH W. DIAB REGARDING WILDER MEDIATION.	0.30	
08/16/24	WOD	ATTEND MEDIATION OF MELODY WILDER.	3.00	
08/19/24	BGR	REVIEW JUDGMENT AND DRAFT EMAIL TO DONOFF COUNSEL	0.60	
08/19/24	KLB	EMAILS TO AND FROM M. NILES REGARDING SUBMISSION OF PROPOSED ORDER AND REVISE AND FINALIZE LETTER TO JUDGE HARPER WITH PROPOSED ORDER EXTENDING TIME TO SERVE PROCESS ON DEFENDANTS (.2); FINALIZE PROPOSED ORDER AND SUBMIT ORDER AND COVER LETTER TO JUDGE HARPER (.2); EMAILS TO COUNSEL WITH SUBMISSION TO JUDGE HARPER (.1)	0.50	
08/19/24	MJN	REVIEW PROPOSED ORDER REGARDING SUSSMAN; FOLLOW UP WITH K. BURNS REGARDING THE SAME.	0.30	
08/20/24	BGR	REVIEW AND RESPOND TO DONOFF EMAILS; PROPOSE ACCEPTANCE OF PAYMENT	0.60	
08/20/24	KLB	REVIEW EMAILS FROM CSC REGARDING PAYMENT OF INVOICES FOR REGISTERED AGENT SERVICES FOR CENTURION INSURANCE SERVICES GROUP, LLC AND EMAILS TO AND FROM D. STERMER AND J. O'BRIEN REGARDING SAME	0.20	
08/20/24	GCG	ADDRESS EMAILS AND ISSUES REGARDING DONOFF SETTLEMENT AND ENFORCEMENT	0.20	

F E E S

<u>Date</u>	<u>Attorney</u>	<u>Description</u>	<u>Hours</u>	
08/20/24	MJN	REVIEW PRIOR CORRESPONDENCE RELATED TO DONOFF; FOLLOW UP WITH B.RICH REGARDING THE SAME.	0.50	
08/21/24	KLB	PREPARE MOTION FOR STATUS CONFERENCE IN SUSSMAN CASE AND EMAILS TO B. RICH AND M. NILES REGARDING SAME; REVIEW ONLINE SCHEDULING PORTAL FOR AVAILABLE SPECIAL SET HEARING DATES	0.80	
08/27/24	BGR	ATTEND TO BANK RECORD REQUEST ISSUES AND PENDING MEDIATIONS.	0.60	
08/27/24	KLB	CONDUCT RESEARCH IN BROWARD CIRCUIT COURT REGARDING CASES FILED AGAINST THE ESTATE OF ERIC HOLTZ AND EMAILS TO AND FROM D. STERMER AND TEAM REGARDING SAME	0.20	
08/27/24	GCG	PREPARE FOR AND PARTICIPATE IN CLIENT STRATEGY CONFERENCE (.5); DRAFT MEMO OF MEETING ACTION ITEMS FOR FOLLOW UP (.2); RELATED EMAILS REGARDING ACTION ITEMS REQUESTED BY D. STERMER (.1)	0.80	
08/27/24	MJN	REVISE SETTLEMENT AGREEMENT FOR D. CARLOMAGNO AND CORRESPOND WITH R. SCHINDLER.	0.40	
08/27/24	MJN	DISCUSSION WITH DSI AND RECEIVER TEAM REGARDING OUTSTANDING TASKS AND LITIGATION.	0.50	
08/27/24	WOD	STRATEGY CALL WITH LITIGATION TEAM. [1.0 NO CHARGE]	0.00	N/C
08/28/24	MS	DISCUSSION WITH W. DIAB RE DISCOVERY [.2 NO CHARGE]	0.00	N/C
08/29/24	BGR	FOLLOW-UP ON PENDING MEDIATION ISSUES	0.40	
08/31/24	MJN	REVIEW MTD FILED BY T. ZUCKERBROD ON BEHALF OF D. CUCUIAT	0.40	
09/02/24	MJN	REVIEW MOTION FOR STATUS CONFERENCE.	0.30	
09/03/24	MJN	CORRESPOND WITH R. SCHINDLER REGARDING SETTLEMENT AGREEMENT.	0.40	
09/03/24	WOD	REVIEW PRIOR SETTLEMENT AGREEMENTS TO PREPARE SETTLEMENT AGREEMENT FOR MELODY WILDER.	0.40	
09/03/24	MS	DISCUSSION WITH T. CARUSO RE REQUEST FOR PRODUCTION TOPICS; REVIEW COMPLAINT, MEDIATION STATEMENTS, AND EXHIBITS THERETO -- CONSIDERATIONS FOR DRAFTING DISCOVERY	1.10	

F E E S

Date	Attorney	Description	Hours	
09/04/24	BGR	ATTEND TO DOCUMENTS FROM BANK STATEMENTS	0.40	
09/04/24	KLB	DISCUSSIONS WITH M. NILES REGARDING SCHEDULING OF HEARING ON MOTION TO DISMISS FILED BY J. SUSSMAN (.1); REVIEW ONLINE SCHEDULING PORTAL AND EMAILS TO TEAM REGARDING SAME (.1)	0.20	
09/04/24	GCG	STRATEGY WITH M. NILES AND RELATED EMAILS ON HEARING AND RESPONSE TO MOTION TO DISMISS FILED BY SUSSMAN (.2); ATTENTION TO ESI ISSUES (.2) [4 NO CHARGE]	0.00	N/C
09/04/24	MJN	REVIEW DOCKET REGARDING SUSSMAN; DISCUSS WITH TEAM REGARDING RESPONSE.	0.30	
09/04/24	MJN	FOLLOW UP WITH BOB PEARCE REGARDING MOTION TO DISMISS AND MOTION FOR STATUS CONFERENCE; WORK WITH A. BLANCO REGARDING HEARING.	0.50	
09/04/24	MJN	PROVIDE RESPONSE REGARDING ESI REQUEST FROM ORDER	0.30	
09/04/24	MS	DRAFTING FIRST SET OF REQUEST FOR PRODUCTION	1.00	
09/05/24	BGR	REVIEW AND EDIT SUSSMAN RESPONSE TO MOTION TO DISMISS	0.40	
09/05/24	MJN	CORRESPOND WITH B.PEARCE REGARDING THE SUSSMAN MOTION TO DISMISS AND RESPONSE	0.20	
09/05/24	WOD	DRAFT SETTLEMENT AGREEMENT AND RELATED DOCUMENTS FOR SETTLEMENT WITH MELODY WILDER.	1.50	
09/06/24	MJN	FINALIZE SUSSMAN RESPONSE AND ASSIST IN FILING; FINAL REVIEW OF THE SAME.	0.50	
09/09/24	BGR	STATUS CALL ON DONOFF/PELICAN/DISCOVERY	0.90	
09/09/24	BGR	EDIT CLAIMS PROCEDURE MOTION	1.80	
09/09/24	GCG	REVIEW DOCKET IN PELICAN CASE AND DRAFT PROPOSED EMAIL TO MEDIATOR REGARDING POTENTIAL CONTINUED MEDIATION AND/OR SETTLEMENT FOR B. RICH REVIEW	0.20	
09/09/24	MJN	REVIEW AND REVISE CLAIMS PROCEDURE MOTION	1.20	
09/09/24	MJN	FURTHER REVISE CLAIMS PROCEDURE MOTION BASED UPON ADDITIONAL EDITS/REVISIONS.	0.90	
09/09/24	MJN	REVIEW WILDER MEDIATION SETTLEMENT STATEMENT; CORRESPOND WITH W. DIAB REGARDING THE SAME.	0.60	
09/09/24	MJN	CORRESPOND WITH K.APPLEBY REGARDING	0.20	

F E E S

Date	Attorney	Description	Hours
		SETTLEMENT AGREEMENT.	
09/09/24	MJN	CORRESPOND WITH R. SCHINDLER REGARDING SETTLEMENT AGREEMENT	0.20
09/09/24	WOD	ANALYZE DONOFF MOTION FOR RECONSIDERATION OF APPROVAL OF SETTLEMENT TO PREPARE RESPONSE.	0.50
09/10/24	GCG	EMAILS AND REVIEW OF NOTICE OF HEARING FOR STATUS CONFERENCE AND RELATED REVISIONS AND ATTENTION TO REVISIONS AND FILING/SERVICE OF SAME	0.30
09/10/24	WOD	REVIEW REVISIONS AND FINALIZE FIRST DRAFT OF SETTLEMENT DOCUMENTS FOR MELODY WILDER.	0.30
09/12/24	MJN	FURTHER REVISE CLAIMS PROCESS MOTION	0.70
09/13/24	BGR	RECEIPT AND REVIEW OF OFR AND BANK RECORDS	0.40
09/13/24	GCG	WORK ON RESPONSE TO DONOFF MOTION FOR RECONSIDERATION AND REHEARING	0.40
09/13/24	MJN	REVISE DRAFT MOTION TO COMMENCE CLAIMS PROCESS; PREPARE EMAIL TO RECEIVER AND TEAM REGARDING SAME.	0.60
09/13/24	MJN	CORRESPOND WITH W.DIAB REGARDING RESPONSE TO MOTION FOR RECONSIDERATION; RESEARCH REGARDING THE SAME.	0.70
09/13/24	WOD	ANALYZE DONOFF MOTION FOR RECONSIDERATION (0.5); REVIEW CASE LAW RE: MOTIONS FOR RECONSIDERATION V. REHEARING AND IMPACT ON TIME TO APPEAL (1.0); EXCHANGE ANALYSIS AND STRATEGY WITH LITIGATION TEAM RE: RESPONSE (0.7)	2.20
09/13/24	WOD	CONTINUE RESEARCHING CASE LAW RE: MOTIONS FOR RECONSIDERATION V. REHEARING (1.0); ANALYZE PERTINENT CASE FILINGS AND PROCEDURAL HISTORY TO PREPARE OPPOSITION TO DONOFF'S MOTION FOR RECONSIDERATION (1.0); BEGIN DRAFTING OPPOSITION TO MOTION FOR RECONSIDERATION (2.0)	4.00
09/14/24	BGR	REVIEW AND EDIT RESPONSE TO DONOFF AND CALL WITH CLIENT ON SAME	1.60
09/14/24	MJN	REVIEW AND REVISE RESPONSE AND AFFIDAVIT TO DONOFF MOTION FOR RECONSIDERATION.	0.70
09/14/24	WOD	CONTINUE DRAFTING OPPOSITION TO DONOFF'S MOTION FOR RECONSIDERATION; PREPARE AFFIDAVIT OF BRIAN RICH IN OPPOSITION; PREPARE	5.00

F E E S

Date	Attorney	Description	Hours	
		EXHIBITS TO OPPOSITION.		
09/14/24	WOD	ANALYZE COMMENTS FROM LITIGATION TEAM AND CLIENT AND INCORPORATE INTO OPPOSITION TO DONOFF'S MOTION FOR RECONSIDERATION AND AFFIDAVIT OF B. RICH.	1.00	
09/15/24	BGR	REVIEW AND EDIT DRAFT RESPONSE AND AFFIDAVIT IN RESPONSE TO DONOFFS MOTION FOR RECONSIDERATION.	1.50	
09/15/24	WOD	ANALYZE LENGTHY MOTION TO DISMISS FILED BY DANIEL CUCUIAT TO PREPARE RESPONSE STRATEGY.	1.50	
09/16/24	BGR	FURTHER WORK ON DONOFF RESPONSE TO MOTION FOR RECONSIDERATION	0.90	
09/16/24	KLB	REVISE RESPONSE IN OPPOSITION TO DONOFF'S MOTION FOR RECONSIDERATION AND GATHIER AND COMPILE EXHIBITS TO AFFIDAVIT OF B. RICH (.8); TELEPHONE CALLS TO AND FROM W. DIAB REGARDING REVISIONS TO AFFIDAVIT AND FINALIZE REVISED AFFIDAVIT (.3); FORMAT RESPONSE WITH EXHIBITS AND CIRCULATE RESPONSE TO TEAM FOR FINAL REVIEW BEFORE FILING (.3)	1.40	
09/16/24	KLB	TEELPHONE CONFERENCE WITH W. DIAB REGARDING SUBMISSION OF PROPOSED ORDER AND AUTHORITIES TO JUDGE HARPER REGARDING MOTION FOR RECONSIDERATION FILED BY R. DONOFF (.1); DOWNLOAD CASES CITED IN MOTION AND RESPONSE AND ORGANIZE SAME (.2); GATHER FILED MOTION AND RESPONSE AND EMAILS TO W. DIAB (.1)	0.50	
09/16/24	KLB	REVISE COVER LETTER TO JUDGE HARPER AND EMAILS TO AND FROM W. DIAB (.3); FINALIZE COVER LETTER AND REVISE PROPOSED ORDER DENYING MOTION FOR RECONSIDERATION (.3); FORMAT LETTER AND SUBMIT SAME TO ONLINE SCHEDULING PORTAL WITH FILED MOTION, RESPONSE, AND CASES CITED IN MOTION AND RESPONSE (.4)	1.00	
09/16/24	WOD	REVIEW FINAL RESPONSE TO DONOFF MOTION FOR RECONSIDERATION OF ORDER APPROVING SETTLEMENT AND APPROVE FILING.	0.50	
09/16/24	WOD	REVIEW COURT PROCEDURES ON MOTION FOR RECONSIDERATION, PREPARE LETTER TO JUDGE, AND PREPARE PROPOSED ORDER ON DONOFF'S MOTION FOR RECONSIDERATION.	1.50	
09/17/24	BGR	ATTEND TO CLAIM PROCESS MOTION ISSUES [.4 NO CHARGE]	0.00	N/C

F E E S

<u>Date</u>	<u>Attorney</u>	<u>Description</u>	<u>Hours</u>	
09/17/24	MJN	FURTHER REVISE MOTION TO COMMENCE CLAIMS PROCESS. [.5 NO CHARGE]	0.00	N/C
09/18/24	GCG	PREPARE FOR HEARING ON STATUS CONFERENCE REGARDING HEARING REQUEST FOR SUSSMAN MTD	0.20	
09/18/24	MJN	REVIEW MOTION TO COMMENCE CLAIMS PROCESS; REVIEW COMMENTS FROM T. CARUSO; FOLLOW UP REGARDING THE SAME.	0.70	
09/18/24	MJN	PREPARE OUTLINE FOR STATUS CONFERENCE.	0.50	
09/19/24	KLB	EMAILS FROM AND TO G. GAUKROGER REGARDING SUBMISSION OF ORDER DENYING MOTION FOR RECONSIDERATION FILED BY DONOFF	0.10	
09/19/24	KLB	INITIAL PREPARATION OF RECEIVER'S FIFTH REPORT	0.50	
09/19/24	GCG	PREPARE FOR (.4); AND ATTEND UMC HEARING (8:45-9:30) (.7); STRATEGY CONFERENCE WITH D. STERMER (.2); CALL WITH COUNSEL FOR SUSSMAN (.1); EMAILS TO/FROM COUNSEL FOR SUSSMAN (.1); EMAILS TO/FROM B. RICH AND TO D. STERMER AND TEAM (.2)	1.70	
09/20/24	BGR	REVIEW ORDER FROM COURT ON DONOFF MOTION TO RECONSIDER AND DRAFT EMAIL TO T. ZUCKERBROD AND ROSE SCHINDLER ON PAYMENT.	0.90	
09/20/24	WOD	CALL WITH LITIGATION TEAM AND ESI TEAM TO DISCUSS ESI REVIEW AND STORAGE STRATEGY. [.5 NO CHARGE]	0.00	N/C
09/20/24	WOD	ANALYZE CUCUIAT MOTION TO DISMISS TO PREPARE RESPONSE.	2.00	
09/23/24	BGR	CALLS WITH T. ZUCKERBROD AND R. SCHINDLER ON DONOFF ISSUES AND DISCUSSION WITH CLIENT ON SAME	0.90	
09/23/24	KLB	CONTINUED PREPARATION OF RECEIVER'S FIFTH REPORT	0.70	
09/23/24	KLB	RESEARCH REGARDING RECORDED AGREED FINAL JUDGMENT AND ARRANGE TO OBTAIN CERTIFIED COPY FOR RECORDING IN BROWARD COUNTY (.6); DISCUSSIONS WITH M. NILES REGARDING RECORDING OF JUDGMENT AND SUBMIT SAME FOR RECORDING IN BROWARD COUNTY (.5)	1.10	
09/23/24	MJN	CORRESPOND WITH COUNSEL REGARDING DONOFF JUDGMENT; FOLLOW UP WITH RECEIVER REGARDING THE SAME.	1.00	
09/24/24	KLB	INITIAL PREPARATION OF MOTION TO APPROVE SETTLEMENT WITH D. CARLOMAGNO AND EMAILS TO AND FROM M. NILES REGARDING SAME	0.30	

F E E S

Date	Attorney	Description	Hours	
09/24/24	GCG	CLIENT TELECONFERENCE (.2); STRATEGY CONFERENCE WITH B. RICH (.2); REVIEW COURT ORDER REGARDING DONOFF AND ADDRESS FEES ENTITLEMENT ISSUES (.2)	0.60	
09/24/24	MJN	CORRESPOND WITH W.DIAB REGARDING CUCUIAT MOTION TO DISMISS; REVIEW MOTION TO DISMISS [.6 NO CHARGE]	0.00	N/C
09/25/24	KLB	CONTINUED PREPARATION OF MOTION TO APPROVE SETTLEMENT WITH D. CARLOMAGNO AND EMAILS TO M. NILES	0.80	
09/25/24	KLB	PREPARE PROPOSED ORDER APPROVING SETTLEMENT WITH D. CARLOMAGNO	0.50	
09/25/24	KLB	INITIAL PREPARATION OF MOTION FOR CLERK'S DEFAULT AGAINST P. BECK AND REQUEST AFFIDAVIT OF NON-MILITARY SERVICE THROUGH SERVICEMEMBERS CIVIL RELIEF ACT FOR SAME	0.80	
09/25/24	KLB	PREPARE MOTION FOR CLERK'S DEFAULT AGAINST A. LOMBARDO AND REVIEW DOCKET (.7); EMAILS TO SERVICEMEMBERS CIVIL RELIEF ACT TO OBTAIN AFFIDAVIT OF NON-MILITARY SERVICE (.2)	0.90	
09/25/24	MJN	REVIEW AND REVISE MOTION TO APPROVE SETTLEMENT AGREEMENT.	0.50	
09/25/24	WOD	COMMENCE DRAFTING RESPONSE TO D. CUCUIAT MOTION TO DISMISS.	1.00	
09/26/24	KLB	PREPARE NOTICE OF FILING PROCEDURES ORDER TO BE FILED IN ACTION FILED AGAINST D. CARLOMAGNO	0.50	
09/26/24	KLB	INITIAL PREPARATION OF MOTION TO APPROVE FEES AND EXPENSES OF BERGER SINGERMAN	0.40	
09/26/24	KLB	REVIEW AFFIDAVITS OF NON-MILITARY SERVICE FOR A. LOMBARDO AND P. BECK AND REVISE MOTIONS FOR CLERK'S DEFAULTS (.4); PREPARE PROPOSED CLERK'S DEFAULTS AND EMAILS TO B. RICH AND M. NILES (.4)	0.80	
09/26/24	KLB	REVISE AND FINALIZE MOTION FOR CLERK'S DEFAULT AGAINST P. BECK AND COMPILE ATTACHMENT (.3); FORMAT AND E-FILE MOTION AND PREPARE FOR SERVICE (.2)	0.50	
09/26/24	KLB	RESEARCH REGARDING PROCEDURE FOR PUBLISHING OF NOTICE OF ACTION AND FILING OF MOTION TO PERMIT SERVICE BY PUBLICATION	0.30	
09/26/24	KLB	PREPARE MOTION FOR ORDER PERMITTING PLAINTIFF TO SERVE BY PUBLICATION AND PREPARE	1.60	

F E E S

Date	Attorney	Description	Hours
		SWORN AFFIDAVIT OF M. NILES REGARDING SAME (.9); PREPARE PROPOSED ORDER GRANTING MOTION FOR ORDER PERMITTING PLAINTIFF TO SERVE BY PUBLICATION AND PREPARE NOTICE OF ACTION (.6); REVIEW RETURNS OF SERVICE (.1)	
09/26/24	GCG	REVIEW AND RESPOND TO ISSUES REGARDING DEFAULTS AGAINST NON-RESPONDING ADVISOR DEFENDANTS	0.10
09/26/24	MJN	REVIEW NOTICE OF FILING CONFIDENTIALITY AGREEMENT.	0.30
09/26/24	MJN	REVIEW MOTION FOR ENTRY OF CLERK DEFAULT (BECK AND LOMBARDO); REVIEW CORRESPONDENCE FROM LOMBARDO; FOLLOW UP WITH TEAM REGARDING THE SAME.	0.50
09/26/24	MJN	CORRESPOND WITH R. SCHINDLER REGARDING SETTLEMENT AGREEMENT. REVIEW SETTLEMENT AGREEMENT.	0.50
09/26/24	WOD	COMMENCE DRAFTING RESPONSE TO MOTION TO DISMISS.	3.00
09/27/24	BGR	FOLLOW-UP DARRIN CARLOMAGNO AGREEMENT ISSUES AND ROSE SCHINDLER COMMENTS	0.60
09/27/24	KLB	INITIAL PREPARATION OF THIRD MOTION FOR PAYMENT OF FEES AND EXPENSES OF BERGER SINGERMAN	1.30
09/27/24	WOD	CONTINUE DRAFTING RESPONSE TO MOTION TO DISMISS FILED BY CUCUIAT.	0.50
09/30/24	BGR	PREPARE FOR ROPER CALL	0.90
09/30/24	KLB	CONTINUED PREPARATION OF THIRD MOTION FOR PAYMENT OF FEES AND EXPENSES OF BERGER SINGERMAN	0.80
09/30/24	KLB	REVIEW EMAIL REGARDING SERVICE BY PUBLICATION AND PREPARE DETAILED STATEMENT AS TO SERVICE ATTEMPTS AND ATTEMPTS TO LOCATE BETTER ADDRESSES	0.70
09/30/24	GCG	REVIEW DRAFT MOTION FOR PUBLICATION SERVICE AND APPLICABLE STATUTES (.4); CASE LAW RESEARCH REGARDING SUFFICIENCY OF AFFIDAVIT (.3); DRAFT EMAIL MEMO REGARDING SAME (.2); REVIEW AND ANALYZE MOTION FILED BY PELICAN COUNSEL (.4)	1.30
09/30/24	MJN	RESEARCH REGARDING SUBSTITUTE SERVICE AND PUBLICATION.	0.70

F E E S

Date	Attorney	Description	Hours
09/30/24	JMD	RESEARCH REGARDING SUBSTITUTE SERVICE OF PROCESS ON INDIVIDUAL DEFENDANTS; CONFERENCE WITH MIKE NILES REGARDING SAME.	0.20
Total Hours:			1526.70
Total Fees:			884,449.00

F E E S U M M A R Y

Attorney	Hours	Rate	Total
Paul Avron	9.30	715.00	6,649.50
Kerry L. Burns	101.30	295.00	29,883.50
Kerry L. Burns	145.00	325.00	47,125.00
Carmen Cruz	0.00	0.00	0.00
William O. Diab	44.10	460.00	20,286.00
William O. Diab	181.50	510.00	92,565.00
James M. Durant	0.20	495.00	99.00
Charles M. Gantz	0.00	0.00	0.00
Gavin Gaukroger	0.00	0.00	0.00
Gavin Gaukroger	36.80	650.00	23,920.00
Gavin Gaukroger	98.40	715.00	70,356.00
Perry Hicks	46.40	430.00	19,952.00
Perry Hicks	18.80	510.00	9,588.00
Melanie Hines	3.60	600.00	2,160.00
Michael J. Niles	71.00	550.00	39,050.00
Michael J. Niles	307.00	635.00	194,945.00
Brian G. Rich	206.50	675.00	139,387.50
Brian G. Rich	238.50	750.00	178,875.00
Maxwell Sawyer	18.30	525.00	9,607.50
Total		1526.70	\$884,449.00

EXPENSES

Date	Description	Amount
-------------	--------------------	---------------

EXPENSES

Date	Description	Amount
07/17/23	VENDOR: FIFTH THIRD BANK; INVOICE#: 07172023; DATE: 7/17/2023 - 29956.0002 SUBPOENA RESEARCH	50.31
07/31/23	PAYEE: BANK OF AMERICA; REQUEST#: 48659; DATE: 7/31/2023. - 29956.0002 PAYMENT OF INVOICE 785995 TO COVER COST OF DOCUMENT PRODUCTION	30.60
09/11/23	VENDOR: BANK OF AMERICA; INVOICE#: D062123000598; DATE: 9/11/2023 - 29956.0002 REASERCH AND SUBPOENA	29.80
10/23/23	PAYEE: E-PORTAL FILING; REQUEST#: 50015; DATE: 10/23/2023. - 29956.0002 SERVICE OF PROCESS FEE TO FLORIDA CHIEF FINANCIAL OFFICER FOR SUBMISSION OF SUBPOENA TO TRANSAMERICA LIFE INSURANCE COMPANY.	15.00
10/25/23	PAYEE: E-PORTAL FILING; REQUEST#: 50104; DATE: 10/25/2023. - 29956.0002 FILING FEES FOR FILING OF 5COMPLAINTS PLUS FEE FOR ISSUANCE FOR 5 SUMMONSES	416.00
10/25/23	PAYEE: E-PORTAL FILING; REQUEST#: 50107; DATE: 10/25/2023. - 29956.0002 FILING FEES FOR FILING OF 5 COMPLAINTS FEE FOR ISSUANCE FOR 5 SUMMONSES	416.00
10/25/23	PAYEE: E-PORTAL FILING; REQUEST#: 50108; DATE: 10/25/2023. - 29956.0002 FILING FEES FOR FILING OF 5 COMPLAINTS FEE FOR ISSUANCE FOR 5 SUMMONSES	416.00
10/25/23	PAYEE: E-PORTAL FILING; REQUEST#: 50109; DATE: 10/25/2023. - 29956.0002 FILING FEES FOR FILING OF 5 COMPLAINTS FEE FOR ISSUANCE FOR 5 SUMMONSES	416.00
10/25/23	PAYEE: E-PORTAL FILING; REQUEST#: 50110; DATE: 10/25/2023. - 29956.0002 FILING FEES FOR FILING OF 5 COMPLAINTS FEE FOR ISSUANCE FOR 5 SUMMONSES	416.00
11/10/23	PAYEE: E-PORTAL FILING; REQUEST#: 50594; DATE: 11/10/2023. - 29956.0002 FILING / SUMMONS FEE	15.00
11/10/23	PAYEE: E-PORTAL FILING; REQUEST#: 50586; DATE: 11/10/2023. - 29956.0002 FILING	15.00
11/10/23	PAYEE: E-PORTAL FILING; REQUEST#: 50587; DATE: 11/10/2023. - 29956.0002 FILING	15.00
11/15/23	PAYEE: E-PORTAL FILING; REQUEST#: 50588; DATE: 11/15/2023. - 29956.0002 FILING	15.00
11/20/23	VENDOR: OJF SERVICES, INC.; INVOICE#: OJF-2023028061; DATE: 11/20/2023 - 29956.0002 PALM BEACH SERVICE FEE, RUSH FEE, GAS SURCHARGE, SERVED ON: ANTONIO DECEMBRINO	83.00
11/21/23	VENDOR: OJF SERVICES, INC.; INVOICE#: OJF-2023028062; DATE: 11/21/2023 - 29956.0002 GAS SURCHARGE, NATIONWIDE SERVICE, PRINTING, SERVED ON: DANIEL TEPPER	148.00
11/28/23	VENDOR: OJF SERVICES, INC.; INVOICE#: OJF-2023028058; DATE: 11/28/2023 - 29956.0002 RUSH FEE, SERVED ON: JEFFREY ABRAMSON	90.00

EXPENSES

Date	Description	Amount
11/29/23	PAYEE: E-PORTAL FILING; REQUEST#: 50610; DATE: 11/29/2023. - 29956.0002 FILING/SUMMONS FEE	15.00
11/29/23	PAYEE: E-PORTAL FILING; REQUEST#: 50611; DATE: 11/29/2023. - 29956.0002 FILING/SUMMONS FEE	15.00
11/29/23	PAYEE: E-PORTAL FILING; REQUEST#: 50612; DATE: 11/29/2023. - 29956.0002 FILING/SUMMONS FEE	15.00
12/01/23	VENDOR: OJF SERVICES, INC.; INVOICE#: OJF-2023028063; DATE: 12/1/2023 - 29956.0002 RUSH FEE, GAS SURCHARGE, STATEWIDE SERVICE, SERVED ON: DEAN EMMETS	123.00
12/06/23	PAYEE: E-PORTAL FILING; REQUEST#: 50846; DATE: 12/6/2023. - 29956.0002 SUMMONS FEE	15.00
12/07/23	VENDOR: OJF SERVICES, INC.; INVOICE#: OJF-2023030325; DATE: 12/7/2023 - 29956.0002 PALM BEACH SERVICE, SERVED ON: ANTONIO DICEMBRINO	45.00
12/11/23	VENDOR: OJF SERVICES, INC.; INVOICE#: OJF-2023028060; DATE: 12/11/2023 - 29956.0002 RUSH FEE, GAS SURCHARGE, STATEWIDE SERVICE, SERVED ON: JASON SUSSMAN	123.00
12/13/23	VENDOR: OJF SERVICES, INC.; INVOICE#: OJF-2023030864; DATE: 12/13/2023 - 29956.0002 PALM BEACH SERVICE, SERVED ON: DANIEL TEPPER	45.00
12/26/23	VENDOR: OJF SERVICES, INC.; INVOICE#: OJF-2023030873; DATE: 12/26/2023 - 29956.0002 STATEWIDE SERVICE, PRINTING, SERVED ON: JASON SUSSMAN	91.80
12/28/23	VENDOR: OJF SERVICES, INC.; INVOICE#: OJF-2023031438; DATE: 12/28/2023 - 29956.0002 PALM BEACH SERVICE, SERVED ON: JEFFREY ABRAMSON	45.00
01/04/24	PAYEE: E-PORTAL FILING; REQUEST#: 51256; DATE: 1/4/2024. - 29956.0002 FEE FOR ISSUANCE OF PLURIES SUMMONS ON JEFFERY ABRAMSON	15.00
01/12/24	VENDOR: OUELLETTE & MAULDIN COURT REPORTERS, INC; INVOICE#: 974957; DATE: 1/12/2024 - 29956.0002 HEARING - HON BRADLEY HARPER VIA ZOOM VIDEOCONFERENCE, ATTENDANCE OF REPORTER	125.00
01/17/24	VENDOR: OUELLETTE & MAULDIN COURT REPORTERS, INC; INVOICE#: 974966; DATE: 1/17/2024 - 29956.0002 HEARING - HON. BRADLEY HARPER VIA ZOOM VIDEOCONFERENCE, ORIG & 1 - 9 PAGES REG. DEL	58.50
01/22/24	VENDOR: OJF SERVICES, INC.; INVOICE#: OJF-2024000821; DATE: 1/22/2024 - 29956.0002 PALM BEACH SERVICE, SERVED ON: JEFFREY ABRAMSON	45.00
03/26/24	VENDOR: BDS COURIER; INVOICE#: 07073416; DATE: 3/26/2024 - 29956.0002 COURIER SERVICE	36.00

EXPENSES

Date	Description	Amount
05/09/24	PAYEE: E-PORTAL FILING; REQUEST#: 53194; DATE: 5/9/2024. - 29956.0002 FILING	416.00
05/09/24	PAYEE: E-PORTAL FILING; REQUEST#: 53195; DATE: 5/9/2024. - 29956.0002 FILING	416.00
05/09/24	PAYEE: E-PORTAL FILING; REQUEST#: 53196; DATE: 5/9/2024. - 29956.0002 FILING	140.00
05/13/24	VENDOR: OJF SERVICES, INC.; INVOICE#: OJF-2024011713; DATE: 6/4/2024 - 29956.0002 SERVED ON SCOTT GENAD - PALM BEACH SERVICE, PRINTING (10 PAGES FREE)	70.10
05/13/24	VENDOR: OJF SERVICES, INC.; INVOICE#: OJF-2024011720; DATE: 6/4/2024 - 29956.0002 PRINTING (10PAGES FREE), UPS FEE SERVED ON DANIEL CUCUIAT	183.74
05/17/24	VENDOR: OJF SERVICES, INC.; INVOICE#: OJF-2024011710; DATE: 5/17/2024 - 29956.0002 PRINTING, UPS FEE, GAS SURCHARGE, STATEWIDE SERVICE	117.09
05/20/24	VENDOR: OJF SERVICES, INC.; INVOICE#: OJF-2024011712; DATE: 5/20/2024 - 29956.0002 PALM BEACH SERVICE, PRINTING, GAS SURCHARGE, SERVED ON: DARRIN CARLOMAGNO	70.10
05/21/24	VENDOR: OJF SERVICES, INC.; INVOICE#: OJF-2024011716; DATE: 5/21/2024 - 29956.0002 PALM BEACH SERVICE, PRINTING, GAS SURCHARGE, SERVED ON: JOSEPH COROZZA	70.10
05/21/24	VENDOR: OJF SERVICES, INC.; INVOICE#: OJF-2024011715; DATE: 5/21/2024 - 29956.0002 PALM BEACH SERVICE, PRINTING, GAS SURCHARGE, SERVED ON: PETER BECK	70.10
05/22/24	VENDOR: VERITEXT; INVOICE#: 7435443; DATE: 5/22/2024 - 29956.0002 CANCELLATION OF SERVICES (HEARING)	175.00
05/22/24	VENDOR: OJF SERVICES, INC.; INVOICE#: OJF-2024011714; DATE: 5/22/2024 - 29956.0002 PALM BEACH SERVICE, PRINTING, GAS SURCHARGE, SERVED ON: ANTHONY LOMBARDO	70.10
05/23/24	VENDOR: VERITEXT; INVOICE#: 7439050; DATE: 5/23/2024 - 29956.0002 CANCELLATION OF SERVICES	175.00
05/30/24	VENDOR: VERITEXT; INVOICE#: 7454223; DATE: 5/30/2024 - 29956.0002 WITNESS: JUDGE BRADLEY HARPER - PROFESSIONAL ATTENDANCE (HEARING)	187.50
05/30/24	VENDOR: VERITEXT; INVOICE#: 7457854; DATE: 6/3/2024 - 29956.0002 WITNESS JUDGE B. HARPER - PROFESSIONAL ATTENDANCE & ELECTONIC FILES	210.00
06/05/24	VENDOR: VERITEXT; INVOICE#: 7467744; DATE: 6/5/2024 - 29956.0002 TRANSCRIPT SERVICES - WITNESS JUDGE B. HARPER	361.20
06/10/24	PAYEE: E-PORTAL FILING; REQUEST#: 53725; DATE: 6/10/2024. - 26656.0002 FILING	25.00

EXPENSES

Date	Description	Amount
09/04/24	VENDOR: CITY NATIONAL BANK INVOICE#: DFANI-2024912 DATE: 9/12/2024	10.00
09/23/24	VENDOR: CITY NATIONAL BANK INVOICE#: VCARD-20241014 DATE: 10/14/2024	8.28
09/23/24	VENDOR: SIMPLIFILE; INVOICE#: 09232024; DATE: 9/23/2024 - 29956.0002 RECORDING FEES BROWARD COUNTY, FL	90.25
09/25/24	VENDOR: CITY NATIONAL BANK INVOICE#: VCARD-20241014 DATE: 10/14/2024	140.00
	PACER CHARGE	87.70
	POSTAGE	472.23
	REPRODUCTION	1,053.00
	WESTLAW CHARGES	2,007.24
Total Expenses		\$11,588.99

CURRENT BALANCE DUE**\$896,037.99**