

**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,

v.

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

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.

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**DEVELOPMENT SPECIALISTS, INC., AS FINANCIAL ADVISOR TO CORPORATE  
MONITOR/RECEIVER DANIEL J. STERMER,<sup>1</sup> THIRD INTERIM MOTION  
FOR COMPENSATION FOR PROFESSIONAL SERVICES AND  
REIMBURSEMENT OF EXPENSES FOR THE PERIOD FROM  
MAY 12, 2023 THROUGH SEPTEMBER 30, 2024**

Development Specialists, Inc. (“DSI”), as financial advisor to the Corporate Monitor/Receiver<sup>2</sup>, Daniel J. Stermer (the “Receiver” and/or “Corporate Monitor”)<sup>3</sup>, 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 Development Specialists, Inc. as Financial Advisor 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**”)<sup>4</sup> authorizing the retention of DSI as financial advisor to the

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<sup>1</sup> This Third Interim Motion for Development Specialists, Inc. includes the fees for professionals at Development Specialists, Inc. and does not include the fees and expenses of the Corporate Monitor who will be submitting a separate Third Interim Motion for his fees and expenses.

<sup>2</sup> On May 12, 2023, the Court entered an *Order Appointing Receiver* which appointed Daniel J. Stermer as Receiver of the Consenting Corporate Defendants (as defined below).

<sup>3</sup> 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.

<sup>4</sup> 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.;

Corporate Monitor and now Receiver. This Third Interim Fee Motion requests approval of fees in the amount of \$456,032.00<sup>5</sup>, which has been voluntarily reduced from \$570,040.00 and expenses in the amount of \$119.81 for a total fee and expense request in the amount of \$456,151.81 for services rendered by DSI as financial advisor to the Corporate Monitor during the Third Interim Period. DSI requests that the Court approve and allow all of the fees and expenses requested herein during the Third Interim Period in the amount of \$456,151.81, but does not request payment of these fees and expenses at this time. DSI further requests the Court to authorize the payment of the amount up to \$368,957.99<sup>6</sup> to DSI, which sum represents the fees and expenses previously approved and awarded but not yet authorized to be paid to DSI, as requested in *Development Specialists, Inc., as Financial Advisor to Corporate Monitor/Receiver Daniel J. Stermer, 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 awarded on November 4, 2023, pursuant to this Court’s *Order Granting Development Specialists, Inc., as Financial Advisor to Corporate Monitor/Receiver Daniel J. Stermer, Second Interim Motion for Compensation for Professional Services and Reimbursement of Expenses For the Period From August 1, 2022 Through May 11, 2023*. Accordingly, through this Third Interim Fee Motion, DSI is requesting payment in the amount up to \$368,957.99.

The Receiver and all of his professionals 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 Interim Fee Motion reflects time incurred and billed for approximately a year and half.

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<sup>5</sup> This reduced sum has been discussed with the Plaintiff and represents an accommodation amongst all professionals to initially cap the amount of professional fees paid at this time and to allow the retention of funds for distribution to noteholders and other creditors of the Monitorship Estate.

<sup>6</sup> 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.

In this complex and extensive matter, the amount of investigatory and legal work necessary is immense and time consuming. Similarly, while the restructuring professionals who handle these types of 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,<sup>7</sup>
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*, 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)

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<sup>7</sup> “Intergrity 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 “Intergrity Assets, LLC” and therefore asserts the distinction is not a difference and rather a scrivener’s error.

additional corporate entities as Consenting Corporate Defendants/Monitorship Entities:

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

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.”<sup>8</sup>

9. On September 17, 2021, the Corporate Monitor filed *Corporate Monitor, Daniel J. Stermer’s Unopposed Motion for Approval of Employment of Development Specialists, Inc. as Financial Advisor 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 DSI as his financial advisor, 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 Development Specialists, Inc. as Financial Advisor to the Corporate Monitor, Effective as of September 14, 2021* dated September 18, 2021 (the “**Retention Order**”), authorizing the Corporate Monitor’s employment of DSI as financial advisor to the Corporate Monitor, effective as of September 14, 2021. Paragraph 4 of the Retention Order provides:

“The Corporate Monitor seeks Court approval to retain DSI as his financial advisor in connection with this case, to provide day-to-day management, accounting and other support services, including, but not limited to: (i) oversight and analysis of financial transactions; (ii) evaluation of preferences, fraudulent conveyances and litigation matters; and (iii) assisting with such other matters as the Corporate Monitor deems necessary.”

**DESCRIPTION OF PROFESSIONAL SERVICES RENDERED BY DSI  
DURING THE THIRD INTERIM PERIOD**

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<sup>8</sup> See Footnote 3 above.

11. This case is very complex and requires extensive work by DSI on behalf of the Corporate Monitor and now Receiver and all of his retained professionals and others. As of the filing of this Third Interim Fee Motion, there are 33 corporate entities subject of the Receivership. As described 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 Third Interim Fee Motion, there have been 1,670 claims filed, asserting approximately \$383 Million in losses against the Receivership Entities (including claims against Grace Holdings Financial LLC).<sup>9</sup> 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.

12. The Receiver, with the assistance of DSI has worked diligently to fulfill his duties under the Receivership Order to, *inter alia*, investigate the affairs of the Receivership Entities, manage the day-to-day 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 sought.

13. In connection with efforts to be transparent in the work being done by the Receiver and DSI, and in compliance with the Receivership Order, the Receiver, with the assistance of Berger Singerman and DSI, has 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

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<sup>9</sup> A detailed description of the relationship between Grace Holdings and the Monitorship entities has been set forth in the Reports.



Monitor filed, with the assistance of Berger Singerman and DSI, 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. The Corporate Monitor established, and the Receiver maintains, a separate website for this matter to inform all parties in interest of the Receivership's activities: <https://nationalseniormonitorship.com> (the "Website"). All the Receiver Reports have been posted on the Website and additional updates to Noteholders and FAQs were posted on the Website as well as all court filings in this matter and related matters. In addition to posting the Reports and Updates on the Website, the Receiver distributed the Receivership Reports and Updates via email to Noteholders and other parties in interest. Further, Receiver, with the assistance of his professionals, responds to 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.

14. The Receiver Reports provide very detailed status on each aspect of this case and should be read in conjunction with this Third Interim Fee Motion and are incorporated herein as if fully stated herein.

a. **Noticing and Claims Administration Process**

15. The Receiver, in his prior capacity as Corporate Monitor, with the assistance of his counsel, 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 distribution<sup>10</sup> 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 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.

16. On June 27, 2022,<sup>11</sup> the Court entered an Order granting the Claim Motion and setting **August 31, 2022**,<sup>12</sup> as the deadline by which claimants must return completed Proofs of Claim forms to the Corporate Monitor. While claims are still being received and processed, a summary of claims received to date is set forth below:

Total # of Claims	1,670
Total # of Individualized Claimants	1,077

<sup>10</sup> 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.

<sup>11</sup> 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.

<sup>12</sup> 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).

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

17. The Receiver, with the assistance of DSI and Berger Singerman, have been reviewing and analyzing the Claims that have been filed by Noteholders and other creditors.

b. **Discovery**

18. During the Third Interim Period, the Corporate Monitor, with the assistance of his counsel, 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.

19. 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.

20. 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**

21. 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.<sup>13</sup>

22. 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 DSI and 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

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<sup>13</sup> 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.

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.

23. 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**

24. 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 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. On June 28, 2024, Counsel for Jason Sussman filed a Motion to Dismiss. Receiver's counsel filed a response on September 6, 2024 and the hearing on the Sussman Motion to Dismiss has been set by the Court for January 7, 2025 at 2:00 p.m. as a Special Set Hearing. On August 30, 2024, Counsel for Daniel Cucuiat filed a Motion to Dismiss (the Cucuiat Motion to Dismiss was filed in the OFR Enforcement Action as opposed to the Sussman Action). Receiver's Counsel filed a response on October 11, 2024 (in both the OFR Enforcement Action and the Sussman Action) and the Receiver is in the process of setting the Cucuiat Motion 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**

25. 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*, thereby denying the Donoff Motion for Reconsideration.

26. The Receiver, with the assistance of Berger Singerman and DSI, 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.



**f. Other Litigation**

27. On May 9, 2024, the Receiver, with the assistance of DSI and 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, through new Counsel Scott Alan Orth, Esq./Law Offices of Scott Alan Orth, P.A., filed its Motion to Dismiss, Notice of Service of Interrogatories, Notice of Service of Request for Production, and Request for Admissions and on October 2, 2024, filed and served its Notice of Serving Proposal for Settlement. On October 15, 2024, the Receiver 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 Management, LLC alleging conflicts of interest due to Mr. Orth's prior representation of the Consenting Corporate Defendants, some of whom are the entities who commenced this recovery action against Pelican, and the Verified Motion is currently pending before the Court and the Receiver prepared and filed his Notice of Filing of the Verified Motion in the OFR Enforcement Action as well as in the Pelican matter.

**g. Other Action(s)**

28. During the Third Interim Period, DSI provided professional services that were necessary and beneficial to the Monitorship Estate as summarized above and, *inter alia*, as described below:

- a. The Receiver and his professionals assisted with issues pertaining to the filing of claims, including, but not limited to, responding to inquiries from creditors regarding the filing of claims, assisting with issues relating to the publishing of notice of the claims bar date, assisting with preparing claims packages to be sent to creditors and interested parties, reviewing and analyzing claims filed in the Receivership Estate, preparing an analysis of principal and interest payments to investors including amounts paid to investors through their respective IRA administrators, and conducting discussions regarding various claims issues.
- b. The Receiver assisted Berger Singerman 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. The Receiver and his professionals at DSI and Berger Singerman assisted 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. The Receiver participated in multiple status and strategy calls with his team with respect to various issues, including, but not limited to, the status of this Receivership proceeding and potential litigation claims, the production of documents from various entities, individuals and financial institutions, and the claims filed by Noteholders and other creditors.
- e. The Receiver, with the assistance of his professionals, prepared subpoenas directed to various entities and financial institutions, directing the production of various documents and banking records, and converted thousands of documents and bank records to Excel such that they could be reviewed and analyzed for potential recovery actions.
- f. The Receiver attended multiple discussions with his team and counsel regarding case administration issues, discovery-related issues, and conducted strategy discussions in advance of meetings relating to the business of the Receivership Defendants.
- g. The Receiver, along with his team at DSI and counsel, have done extensive analyses regarding potential causes of action and areas for recovery.
- h. The Receiver, along with DSI, have reviewed payroll and banking records to determine amounts paid to former advisors as commissions/bonuses.
- i. The Receiver, with the assistance of this team, 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 Berger Singerman and members of Development Specialists, Inc. regarding the supplemental proceedings.
- j. The Receiver, with the assistance of 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.
- k. The Receiver, with the assistance of Berger Singerman, assisted with the preparation of numerous mediation statements, attended mediations conducted on January 26, 2024, March 26, 2024, April 8, 2024, April 10, 2024, April 24, 2024, and May 8, 2024, and reviewed settlement agreements by Berger Singerman reflecting the resolution of certain of the matters that were resolved

at mediation

29. DSI assisted the Receiver and Berger Singerman with the preparation and filing of various motions 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 Corporate Monitor, Berger Singerman, 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.

30. In addition to the preparation of the above-listed motions and proposed orders, DSI assisted the Receiver and Berger Singerman with the preparation and filing of the Reports, all updates, and information for Noteholders regularly. DSI responded to and/or assisted the Receiver in responding to multiple calls, emails and inquiries from Noteholders, their families, and/or their professionals, in an effort to keep them informed, answer questions (not providing legal or tax and/or financial planning advice), directing them to third parties for assistance and in many instances just assisting them in understanding the process. Some communications have not been pleasant, but they all must be and have been responded to.

31. In addition, during the Third Interim Period, DSI dealt with multiple issues on a daily basis regarding the administration of this case and, efforts to bring about resolutions between

parties and various issues.

32. DSI provides the following exhibits attached to this Third Interim Fee Motion in order to provide information about its professional time spent on this matter:

Exhibits “1-A” and “1-B”- Summary of Time Per Individual and by Activity Code Category.

Exhibit “3” – Time Records.<sup>14</sup>

The detailed time records reflecting the services rendered by DSI on behalf of the Receiver during the Third Interim Period, representing 1,869.90 hours performed by DSI, are attached hereto as **Exhibit “3”**. The blended hourly rate during the Third Interim Period is \$304.85. The Plaintiff requested that DSI 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, DSI has agreed to voluntarily reduce its fees requested herein from \$570,040.00 to \$456,032.00. The blended hourly rate during the Third Interim Period after considering the reduction in hourly rates is \$243.88.

33. DSI utilized numerous professionals in this case. All efforts were made to utilize lower hourly rate professionals 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 DSI as set forth on **Exhibit “A-1”** range from \$75.00 to \$795.00 for professionals, which is customary for professionals in Florida of similar skill and experience.<sup>15</sup> DSI’s actual fees incurred during the Third Interim Period totaled

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<sup>14</sup> Certain limited redactions may 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.

<sup>15</sup> As shown in the Detailed Time Records, DSI utilized staff members at hourly rates of \$75.00 to perform certain tasks and doing so thus reducing potential fees incurred during the Third Interim Period.

\$570,040.00, representing 1,869.90 hours of time spent by professionals working on this matter. However, DSI voluntarily reduced its fees, at the request of Plaintiff, by \$114,008.00, from \$570,040.00 to \$456,032.00, during the Third Interim Period.

34. DSI and the Receiver have conferred with Plaintiff about the contents of this Third Interim Motion and the Plaintiff has no opposition to same as sought herein and has consented to same being filed and sought. The reduced overall compensation requested as well as the agreement not to seek payment of the \$456,032.00 in fees and \$119.81 in expenses at this time reflects the understanding that funds will remain in the estate for distribution, at some point in time, to allowed claims.

**h. Summary of Services Rendered**

35. This Third Interim Fee Motion is the third interim application for compensation for services rendered and reimbursement of expenses incurred by DSI in this case. In connection with the professional services described below, by this Third Interim Fee Motion, DSI seeks Court approval of compensation in the amount of \$456,032.00, which sum has been reduced from \$570,040.00, and \$119.81 for reimbursement of expenses incurred for the Third Interim Period.

36. A detailed recitation of each and every item of professional services that DSI performed during the Third Interim Period would unduly burden the Court. The following summaries are therefore intended to highlight the areas in which services were rendered throughout the Third Interim Period. As more fully described in the attached exhibits, these services included, but were not limited to, the following:

a) Fee Application/Client Billing. DSI spent a total of 11.00 hours at a total cost of \$8,525.00 in connection with the preparation of DSI's second fee application/client billing in this matter, before considering the 20% rate reduction agreed to by DSI.

b) Attend Court Hrgs/Rev Pleadgs. DSI spent a total of 3.50 hours at total cost

of \$1,354.00 in connection with attending court hearings and/or reviewing pleadings, before considering the 20% rate reduction agreed to by DSI.

c) Forensic Accounting/Sources and Uses. DSI spent a total of 1,016.10 hours at a total cost of \$284,583.00 in connection with forensic accounting/sources and uses performed in this matter, before considering the 20% rate reduction agreed to by DSI.

d) Business Analysis. DSI spent a total of 156.70 hours at a total cost of \$54,065.00 in connection with business analysis in this matter, before considering the 20% rate reduction agreed to by DSI.

e) Claims Analysis/Objection. DSI spent a total of 322.00 hours at a total cost of \$65,642.00 in connection with claims analysis and/or objection performed in this matter, before considering the 20% rate reduction agreed to by DSI.

f) Non-Debtor Affiliate Issues. DSI spent a total of 1.10 hours at a total cost of \$427.00 in connection with non-debtor affiliate issues, before considering the 20% rate reduction agreed to by DSI.

g) Non-Debtor Subsidiary Issues. DSI spent a total of 3.10 hours at a total cost of \$1,178.00 in connection with non-debtor subsidiary issue in this matter, before considering the 20% rate reduction agreed to by DSI.

h) Third Party Claims. DSI spent a total of 0.90 hours at a total cost of \$355.00 in connection with third party claims in this matter, before considering the 20% rate reduction agreed to by DSI

i) Litigation Support. DSI spent a total of 350.80 hours at a total cost of \$152,108.00 in connection with litigation support in this matter, before considering the 20% rate reduction agreed to by DSI.

j) Government Contact. DSI spent a total of 0.60 hours at a total cost of



\$228.00 in connection with government contact in this matter, before considering the 20% rate reduction agreed to by DSI.

k) Reports for the Court. DSI spent a total of 2.20 hours at a total cost of \$852.50 in connection with reports for the Court in this matter, before considering the 20% rate reduction agreed to by DSI.

l) Life Insurance Policies. DSI spent a total of 1.90 hours at a total cost of \$722.00 in connection with life insurance policies in this matter, before considering the 20% rate reduction agreed to by DSI.

37. DSI devoted not less than 1,869.90 hours of professional time on this matter during the Third Interim period. When reviewed individually as to each one of the tasks described above, or collectively as a whole, the time expended by DSI has been reasonable and efficient and necessary to accomplish the needs of the case.

38. No agreement or understanding exists between the DSI and any other person for the sharing of compensation received or to be received for services rendered on behalf of the Receivership Estate in connection with this matter.

#### **DSI'S EXPENSES INCURRED DURING THE THIRD INTERIM PERIOD**

DSI also requests reimbursement of expenses incurred as financial advisor to the Receiver, during the Third Interim Period in the amount of \$119.81. DSI provides the following exhibit attached to this Third Interim Fee Motion in order to provide information about its expenses incurred on this matter - Exhibit "2" - Summary of Requested Reimbursement of Expenses.

#### **CONCLUSION**

DSI respectfully requests that the Court (a) approve DSI's Third Interim Fee Motion requesting compensation in the amount of \$456,032.00, after voluntary reduction from \$570,040.00, and expenses in the amount of \$119.81 for a total approved amount of \$456,151.81

for the Third Interim Period, but not authorize payment at this time; and (b) authorizing the Receiver to pay DSI the sum up to \$368,957.99,<sup>16</sup> representing the approved and awarded fees of DSI for the period of August 1, 2021 through May 11, 2023, which have not yet been authorized to be paid.

**WHEREFORE**, Development Specialists, Inc. respectfully requests that the Court enter an Order (i) approving and allowing all fees and expenses requested during the Third Interim Period (\$456,03.200 in professional fees and \$119.81 in expenses) but not authorizing payment at this time, (ii) authorizing the Receiver to pay DSI the sum up to \$368,957.99 representing the fees approved and awarded, but not yet authorized to be paid from DSI'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,

DEVELOPMENT SPECIALISTS, INC.  
500 E. Broward Boulevard, Suite 1700  
Fort Lauderdale, FL 33394  
Tel. (305) 374-2717  
Fax (305) 374-2718

By: /s/ Patrick J. O'Malley  
Patrick J. O'Malley

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<sup>16</sup> 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.

**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. I further certify that a true and correct copy of the foregoing was served by electronic transmission upon all parties on the attached Service List.

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

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# **EXHIBIT 1-A**

## **Summary of Time per Individual for this Period Only**

OFR v. National Senior Insurance, Inc., et al.  
CASE NO.: 50-2021-CA-008718-XXXX-MB  
May 12, 2023 through September 30, 2024

<b>Name of Professional Person</b>	<b>Position of the Applicant/</b>	<b>Hourly Billing Rate</b>	<b>Total Billed Hours</b>	<b>Total Fees</b>
Patrick J. O'Malley (2024)	Senior Managing Director	\$795.00	41.30	\$32,833.50
Patrick J. O'Malley (2023)	Senior Managing Director	\$775.00	18.70	\$14,492.50
Thomas P. Jeremiassen	Senior Managing Director	\$695.00	12.30	\$8,548.50
Spencer G. Ferrero	Managing Director	\$470.00	52.70	\$24,769.00
Taylor F. Caruso (2024)	Senior Associate	\$395.00	386.70	\$152,746.50
Taylor F. Caruso (2023)	Senior Associate	\$380.00	276.30	\$104,994.00
Gabria A. Brenner (2024)	Associate	\$305.00	90.80	\$27,694.00
Gabria A. Brenner (2023)	Associate	\$295.00	224.50	\$66,227.50
McKenna Novack	Associate	\$295.00	108.00	\$31,860.00
John O'Brien (2024)	Associate	\$290.00	43.80	\$12,702.00
John O'Brien (2023)	Associate	\$275.00	200.40	\$55,110.00
Rowen C. Dizon (2024)	Associate	\$280.00	24.50	\$6,860.00
Rowen C. Dizon (2023)	Associate	\$275.00	9.80	\$2,695.00
Alex A. Vazquez	Paraprofessional	\$75.00	150.90	\$11,317.50
J. S. Cann	Paraprofessional	\$75.00	229.20	\$17,190.00
<b>TOTALS</b>			<b>1,869.90</b>	<b>\$570,040.00</b>
<b>BLENDED HOURLY RATE:</b>		<b>\$304.85</b>		
<b>DISCOUNTED BLENDED HOURLY RATE:</b>		<b>\$243.88</b>		

# **EXHIBIT 1-B**

## **Summary of Time by Activity Code Category** **for this Time Period Only**

OFR v. National Senior Insurance, Inc., et al.  
CASE NO.: 50-2021-CA-008718-XXXX-MB  
May 12, 2023 through September 30, 2024

<b>Activity Category/ Name</b>	<b>Total Hours</b>	<b>Total Fees</b>
Fee Application/Client Billing		
Patrick J. O'Malley	11.00	\$8,525.00
Activity Subtotal:	11.00	\$8,525.00
Attend Court Hrgs/Rev Pleadgs		
Taylor F. Caruso	3.50	\$1,354.00
Activity Subtotal:	3.50	\$1,354.00
Forensic Acct/Sources and Uses		
Patrick J. O'Malley	5.80	\$4,607.00
Taylor F. Caruso	335.70	\$129,481.50
Thomas P. Jeremiassen	2.90	\$2,015.50
Spencer Ferrero	29.50	\$13,865.00
McKenna Novack	84.00	\$24,780.00
Gabria Brenner	110.50	\$33,300.50
R.C. Dizon	12.20	\$3,393.50
John O'Brien	202.20	\$55,642.50
J. S. Cann	228.20	\$17,115.00
Alex A. Vazquez	5.10	\$382.50
Activity Subtotal:	1,016.10	\$284,583.00
Business Analysis		
Patrick J. O'Malley	9.10	\$7,164.50
Taylor F. Caruso	36.50	\$14,159.50
McKenna Novack	21.30	\$6,283.50
Gabria A. Brenner	51.70	\$15,408.50
John O'Brien	38.10	\$11,049.00
Activity Subtotal:	156.70	\$54,065.00

<b>Activity Category/ Name</b>	<b>Total Hours</b>	<b>Total Fees</b>
Claims Analysis/Objections		
Patrick J. O'Malley	1.70	\$1,317.50
Taylor F. Caruso	23.40	\$8,904.00
Gabria A. Brenner	144.60	\$42,674.00
McKenna Novack	1.20	\$354.00
R.C. Dizon	5.30	\$1,457.50
Alex A. Vazquez	145.80	\$10,935.00
Activity Subtotal:	322.00	\$65,642.00
Non-Debtor Affiliate Issues		
Taylor F. Caruso	1.10	\$427.00
Activity Subtotal:	1.10	\$427.00
Non-Debtor Subsidiary Issues		
Taylor F. Caruso	3.10	\$1,178.00
Activity Subtotal:	3.10	\$1,178.00
Third Party Claims		
Taylor F. Caruso	0.90	\$355.50
Activity Subtotal:	0.90	\$355.50
Litigation Support		
Patrick J. O'Malley	32.40	\$25,712.00
Taylor F. Caruso	254.10	\$100,078.50
Thomas P. Jeremiassen	9.40	\$6,533.00
Gabria Brenner	8.50	\$2,538.50
McKenna Novack	1.50	\$442.50
Spencer Ferrero	23.20	\$10,904.00
Rowen C. Dizon	16.80	\$4,704.00
John O'Brien	3.90	\$1,120.50
J. S. Cann	1.00	\$75.00
Activity Subtotal.:	350.80	\$152,108.00



<b>Activity Category/ Name</b>	<b>Total Hours</b>	<b>Total Fees</b>
Government Contact		
Taylor F. Caruso	0.60	\$228.00
Activity Subtotal:	0.60	\$228.00
Reports for Court		
Taylor F. Caruso	2.20	\$852.50
Activity Subtotal:	2.20	\$852.50
Life Insurance Policies		
Taylor F. Caruso	1.90	\$722.00
Activity Subtotal:	1.90	\$722.00
<b>TOTAL ACTIVITY</b>	<b>1,869.90</b>	<b>\$570,040.00</b>

## **EXHIBIT 2**

### **Summary of Requested Reimbursement of Expenses**

OFR v. National Senior Insurance, Inc., et al.  
CASE NO.: 50-2021-CA-008718-XXXX-MB  
May 12, 2023 through September 30, 2024 May 11, 2023

<b>Expense Category</b>	<b>Service Provider (if applicable)</b>	<b>Total Expenses</b>
Other/Miscellaneous		\$119.81
<b>TOTAL</b>		<b>\$119.81</b>

**EXHIBIT 3**

**TIME RECORDS**

National Senior Insurance, Inc. dba Seeman Holtz  
 301 Yamato Road  
 Suite 2222  
 Boca Raton FL 33431

			HOURS	
09/19/2023	PJO	Preparation of the second interim fee application.	4.00	
09/25/2023	PJO	Continued preparation of the second interim fee application.	2.00	
09/26/2023	PJO	Review and revise the second interim fee application and forward to D. Stermer.	0.40	
09/28/2023	PJO	Continued review and revisions to the DSI second interim fee application.	2.90	
09/29/2023	PJO	Final review of the DSI fee application and related emails with the DSI team.	0.30	
10/31/2023	PJO	Preparation for second interim fee hearing.	0.30	
	PJO	Attend second interim fee hearing via Zoom.	1.10	
		Fee Application/Client Billing	11.00	8,525.00
09/29/2023	TFC	Review the motion to expand the receivership.	1.10	
	TFC	Email to Dan Stermer regarding the motion to expand the receivership.	0.20	
10/17/2023	TFC	Review the draft motion to expand the receivership.	0.50	
	TFC	Email to Gavin Gaukroger regarding the draft motion to expand the receivership.	0.10	
09/18/2024	TFC	Review the claims process motion.	1.20	
	TFC	Emails to Mike Niles regarding the claims process motion.	0.40	
		Attend Court Hrgs/Rev Pleadgs	3.50	1,354.00
05/16/2023	TFC	Review missing bank statements and check/deposit images from US Bank.	1.20	
	TFC	Emails to Kerry Burns and Mike Niles regarding missing bank statements and check/deposit images from US Bank.	0.40	
	TFC	Review additional subpoena production materials from US Bank.	0.30	
05/17/2023	TFC	Prepare an updated bank transaction database (AM).	3.10	
	TFC	Prepare an updated bank transaction database (PM).	2.20	

			HOURS	
	TFC	Review the bank transaction database for additional avoidable transfer actions.	0.70	
	TFC	Prepare an updated word document with notes on targets of potential avoidable transfer actions.	0.50	
	TFC	Email to Dan Stermer regarding potential avoidable transfer actions.	0.30	
05/18/2023	TFC	Email to Rowen Dizon regarding review of new check images.	0.20	
	TFC	Prepare an updated bank transaction database.	1.40	
05/19/2023	RCD	Review and analyze payee information for account ending in 5501 for the period of March 14, 2016 through September 14, 2021.	2.10	
	RCD	Review and analyze payee information for account ending in 1495 for the period of September 14, 2021 through June 01, 2022.	1.20	
	RCD	Review and analyze payee information for account ending in 2586 for the period of May 28, 2015 through May 24, 2021.	1.20	
05/24/2023	TFC	Review the bank transaction database for additional potential avoidable transfer actions.	1.60	
05/25/2023	AAV	Updates to bank transactions.	2.30	
	TFC	Prepare a summary of potential avoidable transfer actions.	1.50	
	TFC	Email to Brian Rich regarding a summary of potential avoidable transfer actions.	0.20	
	AAV	Complete an avoidable transfer summary for cash receipts and cash disbursements.	1.00	n/c
06/06/2023	GB	Prepare updated bank transaction database.	2.60	
	GB	Continue to prepare updated bank transaction database.	2.00	
06/07/2023	TFC	Review the bank transaction summary for Brian Rich.	0.80	
	TFC	Email to Gabria Brenner regarding the bank transaction summary.	0.30	
	GB	Prepare updated bank transaction database.	2.60	
	GB	Prepare summary of bank activity for 2017-2023.	2.00	
06/08/2023	TFC	Email to Gabria Brenner regarding updates to the bank transaction database.	0.10	
	GB	Prepare summary of bank activity for 2017-2023.	0.30	
06/09/2023	GB	Prepare summary of bank activity for 2017-2023.	0.50	
06/21/2023	AAV	Reviewed CloudNine for insurance policy dispositions.	2.80	
07/03/2023	GB	Prepare updated bank transaction database.	0.80	

			HOURS
07/06/2023	GB	Prepare an updated bank transaction database.	1.40
07/18/2023	TFC	Prepare a summary of historical payments to Daszkal Bolton.	0.20
07/26/2023	GB	Prepare an updated commission schedule.	3.40
	TFC	Review of the advisor commission summaries and supporting schedules for the demand letters.	1.30
	TFC	Emails to Gabria Brenner regarding the advisor commission summaries and supporting schedules for the demand letters.	0.40
	TFC	Prepare an updated summary of potential avoidable transfer targets.	0.50
	TFC	Email to Pat O'Malley regarding the updated summary of potential avoidable transfer targets.	0.10
	PJO	Review of economics of potential avoidable transfer targets.	0.20
07/27/2023	TFC	Prepare updated advisor commission summaries and supporting schedules for the demand letters.	0.80
	TFC	Email to Brian Rich regarding the potential avoidable transfer targets.	0.20
07/28/2023	JO	Work on tracing cash movement to find differences in reconciling items for the net winners analysis.	1.60
	TFC	Prepare an updated net winner analysis.	3.70
07/31/2023	TFC	Prepare an updated net winner analysis (AM).	3.80
	TFC	Prepare an updated net winner analysis (PM).	3.10
	JO	Work on tracing intrabank activity to support subpoena (AM).	4.00
	JO	Work on tracing intrabank activity to support subpoena (PM).	4.00
08/01/2023	TFC	Email to Jennifer Jimenez regarding a check payment to Donald Ball.	0.10
	TFC	Prepare an updated net winner analysis (AM).	3.60
	TFC	Prepare an updated net winner analysis (PM).	2.80
	TFC	Prepare an updated net winner analysis (Evening).	1.70
	JO	Work on tracing intrabank activity to support subpoena (AM).	4.00
	JO	Work on tracing intrabank activity to support subpoena (PM).	4.00
	JO	Work on tracing intrabank activity to support subpoena (later PM).	0.40
08/02/2023	GB	Prepare listing of entities missing bank statements prior to January 2015.	1.30
	TFC	Meeting with Jack O'Brien regarding exhibits for demand letters to avoidable transfer targets.	0.80
	TFC	Review list of missing bank statements from	

		HOURS
	prior to January 2015.	0.30
TFC	Email to Greg Melchior regarding bank statements from prior to January 2015.	0.20
TFC	Email to Mike Niles and Kerry Burns regarding avoidable transfer exhibits.	0.20
TFC	Prepare an updated net winner analysis (AM).	3.70
TFC	Prepare an updated net winner analysis (PM).	2.20
JO	Made updates to the net winner analysis file to reduce variance to acceptable difference.	1.80
JO	Made updates to intrabank activity analysis to prepare pivot tables for counsel's review.	1.10
JO	Meeting with Taylor Caruso regarding exhibits for demand letters to avoidable transfer targets.	0.80
JO	Work on formatting exhibits for demand letters for avoidable transfer agents for counsel's review.	3.50
JO	Address comments from Taylor Caruso on formatting exhibits for demand letters for avoidable transfer agents for counsel's review.	1.10
08/03/2023	TFC Review the summary of intra-bank intercompany activity for Wells Fargo and FNBCC.	1.40
	TFC Email to Gavin Gaukroger regarding the summary of intra-bank intercompany activity for Wells Fargo and FNBCC.	0.50
	TFC Review the avoidable transfer exhibits.	0.80
	TFC Email to Mike Niles and Kerry Burns regarding the avoidable transfer exhibits.	0.30
	TFC Prepare an updated net winner analysis.	3.60
	JO Address comments from Taylor Caruso on formatting exhibits for demand letters for avoidable transfer agents for counsel's review.	1.00
	JO Perform research via CloudNine to search for Cayman Island-related entities.	1.50
	JO Update intrabank analysis to trace intrabank activity from initial deposit through funds proceeds.	3.50
08/04/2023	JO Continue work on cash tracing exercise to in order to follow the initial deposit in full to disbursement (PM).	4.50
08/07/2023	JO Review and update cash tracing activity.	1.10
08/09/2023	JO Update cash tracing file to send to Taylor Caruso for review.	0.40
	JO Video call with Gavin Gaukroger and Taylor Caruso to discuss intrabank activity file provided and findings from analysis.	1.10
	TFC Video call with Gavin Gaukroger and Jack O'Brien to discuss intrabank activity file provided and findings from analysis.	1.10
	TFC Email to Gavin Gaukroger regarding a summary of prior communications between Wells Fargo and Marshal Seeman.	1.20

			HOURS
	TFC	Prepare a list of individuals at Wells Fargo that communicated with Seeman Holtz.	0.40
	TFC	Review CloudNine for prior communications between Wells Fargo and Marshal Seeman.	3.30
	TFC	Review the Certification of Beneficial Ownership forms and Account Applications for Wells Fargo.	0.50
08/10/2023	JO	Perform research on CloudNine for net winner analysis to determine if payees listed benefited from the scheme.	1.80
	TFC	Emails to Kerry Burns regarding Marshal Seeman bank accounts at Bank of America.	0.70
	TFC	Review bank statements for evidence of Marshal Seeman's personal bank account numbers.	0.60
	TFC	Review CloudNine for the prior settlement agreements with Lucenko and Omdoll.	0.50
	TFC	Email to Dan Stermer regarding the prior settlement agreements with Lucenko and Omdoll.	0.10
	TFC	Email to Jack O'Brien regarding updates to the net winner analysis.	0.30
	TFC	Email to Gabriel Acosta regarding a list of bank transaction details and accounts in Excel.	0.10
	TFC	Prepare an updated net winners analysis.	1.80
08/11/2023	JO	Perform research on CloudNine for net winner analysis to determine if payees listed benefited from the scheme (AM).	4.00
	JO	Perform research on CloudNine for net winner analysis to determine if payees listed benefited from the scheme (PM).	1.20
	TFC	Prepare an updated net winners analysis (AM).	3.10
	TFC	Prepare an updated net winners analysis (PM).	1.60
08/14/2023	JO	Perform research for payees of net winner analysis on CloudNine.	2.30
	JO	Continue to work on net winner analysis to replace generalized IRA administrator tag with specific payee (PM).	3.80
	TFC	Prepare an updated net winner analysis.	0.80
08/15/2023	JO	Meeting with Taylor Caruso to discuss questions on the net winner analysis task.	0.40
	JO	Continue to work on net winner analysis to replace generalized IRA administrator tag with specific payee (AM).	1.50
	JO	Continue to work on net winner analysis to replace generalized IRA administrator tag with specific payee (PM).	2.30
	JO	Continue to work on net winner analysis to replace generalized IRA administrator tag with specific payee (later PM).	1.60
	TFC	Meeting with Jack O'Brien to discuss questions on net winner analysis task.	0.40
08/16/2023	JO	Continued work on net winner analysis (AM).	3.20



			HOURS
	JO	Continued work on net winner analysis (PM).	4.00
	JO	Continued work on net winner analysis (late PM).	0.90
08/17/2023	JO	Video call with Taylor Caruso to discuss information requests for the net winner analysis.	0.50
	JO	Continued work on net winner analysis (AM).	4.00
	JO	Continue to work on net winner analysis (PM).	3.70
	TFC	Video call with Jack O'Brien regarding the net winner analysis.	0.50
08/18/2023	JO	Video call with Taylor Caruso to discuss net winner analysis.	1.20
	JO	Continued work on net winner analysis (AM).	4.00
	JO	Continued work on net winner analysis (PM).	2.80
	TFC	Video call with Jack O'Brien to discuss net winner analysis.	1.20
08/21/2023	JO	Meeting with Taylor Caruso to discuss net winner analysis.	0.70
	JO	Continued work on net winner analysis (AM).	3.00
	JO	Continued work on net winner analysis (PM).	4.00
	JO	Continued work on net winner analysis (late PM).	1.30
	TFC	Meeting with Jack O'Brien to discuss the net winner analysis.	0.70
	TFC	Telephone call with Kerry Burns regarding exhibits for the avoidable transfer targets.	0.30
	TFC	Email to Kerry Burns regarding transactions within Seeman Holtz Insurance Services.	0.10
	TFC	Review noteholder principal and interest payment information provided by Whitney Pope.	0.20
	TFC	Email to Whitney Pope regarding principal and interest payments to their Advanta IRA accounts.	0.10
08/22/2023	JO	Continued work on net winner analysis (AM).	2.70
	TFC	Video call with Dan Stermer regarding status of the net winners analysis.	0.10
	TFC	Email to Jennifer Jimenez regarding noteholders who appear to be net winners.	0.40
	TFC	Review the updated net winner analysis.	0.60
08/23/2023	JO	Continued work on net winner analysis (AM).	4.00
	JO	Continued work on net winner analysis (PM).	1.40
	JO	Meeting with Taylor Caruso to discuss net winner analysis.	0.50
	TFC	Meeting with Jack O'Brien to discuss the net winner analysis.	0.50
08/24/2023	JO	Prepared the exhibit net winner analysis for counsel's review.	0.50
08/25/2023	JO	Continued work on net winner analysis (AM).	3.40
	JO	Continued work on net winner analysis (PM).	3.20

			HOURS
	TFC	Review the updated net winner analysis and exhibit.	1.10
	TFC	Email to Dan Stermer regarding the updated net winner analysis and supporting exhibit.	0.60
09/07/2023	JO	Continue research for net winner analysis on Cloud9 to determine initial deposit of noteholders.	2.50
	TFC	Review the avoidable transfer exhibits.	0.30
	TFC	Email to Mike Niles regarding the avoidable transfer exhibits.	0.10
	TFC	Review the net winners analysis.	0.40
09/08/2023	JO	Update avoidable transfer exhibits from counsel's comments.	1.20
09/19/2023	TFC	Prepare revised avoidable transfer exhibits.	0.60
	TFC	Email to Mike Niles regarding revised avoidable transfer exhibits.	0.20
	TFC	Review CloudNine for records regarding commissions paid to former advisors.	0.80
09/20/2023	MN	Meeting with Taylor Caruso regarding collection of missing noteholder promissory notes.	0.60
	MN	Prepare schedule of collection of noteholder promissory notes.	2.80
	TFC	Meeting with McKenna Novack regarding collection of missing noteholder promissory notes.	0.60
	TFC	Review CloudNine for records regarding commissions paid to former advisors.	0.90
	TFC	Email to Mike Niles regarding evidence of commissions paid to former advisors.	0.50
09/25/2023	JO	Perform research on CloudNine for commission evidence against the advisors (AM).	2.50
	JO	Perform research on CloudNine for commission evidence against the advisors (PM).	3.20
	JO	Meeting with Taylor Caruso to discuss commission research for avoidable transfer actions.	0.20
	JO	Meeting with Taylor Caruso to discuss findings from CloudNine research.	0.50
	TFC	Meeting with Jack O'Brien to discuss commission research for avoidable transfer actions.	0.20
	TFC	Meeting with Jack O'Brien to discuss findings from Cloud9 research.	0.50
	TFC	Prepare a list of explanations as to why the receiver is entitled to additional bank statements from the OFR.	3.80
09/26/2023	GB	Prepare summary of statements received from Wells Fargo.	1.00
	JO	Perform research on CloudNine for commission evidence against the advisors (AM).	2.40
	JO	Perform research on CloudNine for commission	

			HOURS
		evidence against the advisors (PM).	2.50
	TFC	Prepare a list of explanations as to why the receiver is entitled to additional bank statements from the OFR.	1.30
	TFC	Review the summary of documents received to date from Wells Fargo pursuant to various subpoenas.	0.60
	TFC	Email to Kerry Burns regarding a summary of documents received to date from Wells Fargo.	0.10
09/27/2023	JO	Organized and sent file found in CloudNine research to Taylor Caruso for counsel's review.	1.00
	TFC	Prepare a list of explanations as to why the receiver is entitled to additional bank statements from the OFR.	2.70
	TFC	Review support for commission payments to previous advisors.	0.30
	TFC	Email to Jack O'Brien regarding support for commission payments to previous advisors.	0.10
	TFC	Email to Mike Niles regarding support for commission payments to previous advisors.	0.10
09/28/2023	JO	Prepare index related to each Wells Fargo document production (AM).	4.00
	JO	Prepare index related to each Wells Fargo document production (PM).	2.00
	TFC	Prepare a list of explanations as to why the receiver is entitled to additional bank statements from the OFR (AM).	2.90
	TFC	Prepare a list of explanations as to why the receiver is entitled to additional bank statements from the OFR (PM).	1.80
09/29/2023	JO	Continue to work on the review of the Wells Fargo document production.	1.30
	JO	Continue to work on the review of the Wells Fargo document production.	1.30
	JO	Continued work on the review of the Wells Fargo document production.	1.90
	JO	Discussion with Taylor Caruso discuss review process for the prior Wells Fargo document productions.	0.20
	TFC	Discussion with Jack O'Brien to discuss review process for the prior Wells Fargo document productions.	0.20
	TFC	Prepare a list of explanations as to why the receiver is entitled to additional bank statements from the Office of Financial Regulation.	1.10
	TFC	Email to Dan Stermer regarding a list of explanations as to why the receiver is entitled to additional bank statements from the Office of Financial Regulation.	0.30
	TFC	Review the list of explanations as to why the receiver is entitled to additional bank statements from the Office of Financial	

			HOURS
		Regulation.	0.40
	TFC	Email to Mike Niles regarding an updated Wells Fargo document production tracker.	0.30
	TFC	Review an updated Wells Fargo document production tracker.	0.50
10/02/2023	JO	Continued work on the review of the Wells Fargo document production (AM).	3.20
	JO	Continued work on the review of the Wells Fargo document production (PM).	3.60
	MN	Prepare schedule of collection of noteholder promissory notes.	3.20
	TFC	Review the list of explanations as to why the receiver is entitled to additional bank statements from the Office of Financial Regulation.	0.70
	TFC	Prepare a list of explanations as to why the receiver is entitled to additional bank statements from the Office of Financial Regulation.	3.10
	TFC	Review the updated Wells Fargo subpoena document production tracker.	0.80
	TFC	Email to Mike Niles regarding the updated Wells Fargo subpoena document production tracker.	0.20
10/03/2023	JO	Performed research on CloudNine for commission evidence for other targets (PM).	4.00
	JO	Performed research on CloudNine for commission evidence for other targets (AM).	0.70
	MN	Prepare schedule of collection of noteholder promissory notes.	3.80
	MN	Meeting with Taylor Caruso regarding collection of missing life insurance policies.	0.60
	MN	Prepare schedule of collection of missing life insurance policies.	2.40
	TFC	Video call with Jonathan Morton, Rachel Tausend, Jennifer Bortmes, Gavin Gaukroger, and Mike Niles regarding missing documents from the prior Wells Fargo productions.	0.50
	TFC	Video call with Gavin Gaukroger and Mike Niles regarding the Wells Fargo subpoenas and document productions.	0.20
	TFC	Meeting with McKenna Novack regarding collection of missing life insurance policies.	0.60
	TFC	Emails to McKenna Novack regarding the organizational charts and fraud walkthrough.	0.10
10/04/2023	JO	Video call with Michael Niles, William Diab, Taylor Caruso, and Jack O'Brien regarding fraud scheme walkthrough.	1.30
	JO	Performed research on CloudNine for evidence for commissions paid to advisors within the look back period.	3.90
	MN	Video call with Michael Niles, William Diab, Taylor Caruso, and Jack O'Brien regarding fraud scheme walkthrough.	1.30

			HOURS
	MN	Prepare schedule of collection of missing life insurance policies (AM).	1.50
	MN	Prepare schedule of collection of missing life insurance policies (PM).	3.40
	TFC	Video call with Michael Niles, William Diab, McKenna Novack, and Jack O'Brien regarding fraud scheme walkthrough.	1.30
	TFC	Email to Brian Rich regarding the fraud walkthrough video.	0.10
	TFC	Email to William Diab regarding the Life Insurance Policy Put Option agreements.	0.10
	TFC	Research prior transactions with entities affiliated with John Kasbar (AM).	2.20
	TFC	Research prior transactions with entities affiliated with John Kasbar (PM).	2.60
10/05/2023	JO	Meeting with Taylor Caruso to research topics on CloudNine for the advisor demand letters.	0.30
	MN	Meeting with Taylor Caruso regarding collection of missing life insurance policies.	0.70
	MN	Prepare schedule of collection of missing life insurance policies (AM).	2.20
	MN	Prepare schedule of collection of missing life insurance policies (PM).	3.30
	TFC	Meeting with McKenna Novack regarding collection of missing life insurance policies.	0.70
	TFC	Meeting with Jack O'Brien to research topics on CloudNine for advisor demand letters.	0.30
	TFC	Research prior transactions with entities affiliated with John Kasbar.	2.10
	TFC	Email to Dan Stermer regarding prior transaction with entities affiliated with John Kasbar.	0.70
10/06/2023	JO	Performed research on CloudNine for commission evidence paid from advisors.	1.60
	MN	Video call with Taylor Caruso regarding bank statement transactions between PPEs.	1.20
	MN	Prepare schedule of collection of missing life insurance policies.	3.10
	MN	Prepare schedule of bank transactions between PPEs.	2.80
	TFC	Video call with McKenna Novack regarding bank statement transactions between PPEs.	1.20
10/09/2023	MN	Video call with Taylor Caruso regarding bank transactions between PPEs and SHPC.	0.10
	MN	Prepare schedule of bank transactions between PPEs and SHPC.	2.20
	MN	Prepare schedule of collection of missing life insurance policies.	3.50
	JO	Performed research on CloudNine regarding commission evidence within the look-back period (AM).	2.60
	JO	Performed research on CloudNine regarding commission evidence within the look-back period	

		HOURS
	(PM).	3.30
TFC	Video call with McKenna Novack regarding bank transactions between PPEs and SHPC.	0.10
TFC	Review cash tracing examples between PPEs and SHPC.	0.30
TFC	Email to McKenna Novack regarding cash tracing examples between PPEs and SHPC.	0.10
TFC	Research commissions paid to former advisors (AM).	3.60
TFC	Research commissions paid to former advisors (PM).	3.30
10/10/2023	MN Prepare schedule of bank transactions between PPEs and SHPC.	2.80
	MN Prepare schedule of transactions between AAF, Red Spruce, and Park Lane.	0.60
	MN Research relation between Richard Hill and Centurion/Seeman Holtz.	0.80
	MN Prepare schedule of Wells Fargo bank transactions from one PPE to another PPE.	0.50
	JO Performed research on Cloud9 regarding commission evidence within the look-back period (AM).	3.40
	JO Meeting with Taylor Caruso to discuss research regarding commission evidence within the look-back period.	0.20
	JO Performed research on Cloud9 regarding commission evidence within the look-back period (PM).	1.80
	TFC Meeting with Jack O'Brien to discuss research regarding commission evidence within the look-back period.	0.20
	TFC Emails to McKenna Novack regarding involvement of additional Kasbar entities, Red Spruce and Park Lane Funding.	0.40
	TFC Email to Jesus Pena regarding attachments for emails in CloudNine.	0.10
	TFC Email to Jack O'Brien regarding a net winner analysis for Anne Coyman.	0.20
	TFC Review prior transaction documents with Red Spruce and White Oak Financial.	0.30
	TFC Email to McKenna Novack regarding a summary of how much cash was raised at the various PPEs.	0.20
	TFC Review updated cash tracing examples between PPEs and SHPC.	0.40
	TFC Email to McKenna Novack regarding cash tracing examples between PPEs and SHPC.	0.20
	TFC Prepare an insurance carrier subpoena tracker template.	0.80
	TFC Email to McKenna Novack regarding review of the insurance carrier subpoena productions.	0.20
	TFC Email to Kerry Burns regarding missing documents from the prior insurance carrier subpoena productions.	0.30
	TFC Review prior transactions between Agency Acquisition Funding and Red Spruce.	0.20

			HOURS
	TFC	Email to Dan Stermer regarding information on additional Kasbar entities, Red Spruce and Park Lane Funding.	0.40
	TFC	Email to McKenna Novack and Jack O'Brien regarding process to review bank deposit images.	0.30
10/11/2023	MN	Prepare schedule of Wells Fargo bank transactions from one PPE to another PPE.	1.10
	MN	Prepare schedule of investor money being deposited into Wells Fargo accounts.	1.20
	MN	Prepare insurance carrier subpoena tracker file.	3.40
	JO	Meeting with Taylor Caruso to discuss research regarding commission evidence within the look-back period.	0.20
	TFC	Meeting with Jack O'Brien to discuss research regarding commission evidence within the look-back period.	0.20
	TFC	Review the cash tracing examples between the PPEs and SHPC.	0.30
	TFC	Email to McKenna Novack regarding the cash tracking examples between the PPEs and SHPC.	0.10
	TFC	Email to William Diab and Mike Niles regarding research on commissions paid to former advisors.	0.80
	TFC	Research commissions paid to former advisors and review commission payment Excel summaries.	2.20
	TFC	Email to Mike Niles and William Diab regarding sources of commissions paid to former advisors.	0.60
	TFC	Review the investor deposit summary.	0.20
	TFC	Review CloudNine for documentation regarding prior transactions with Pelican Capital Management.	0.80
	TFC	Email to Gavin Gaukroger regarding prior transactions with Pelican Capital Management.	0.30
10/12/2023	MN	Research relation between Darrin Carlomagno and Centurion/Seeman Holtz.	2.10
	MN	Pull advisor commission statements from CloudNine.	2.80
	JO	Performed research on CloudNine on family of an advisor to determine what investments were held.	1.00
	TFC	Email to McKenna Novack regarding small research task regarding Mr. Carlomagno.	0.10
	TFC	Review emails to and from Akerman on CloudNine.	2.30
	TFC	Email to Dan Stermer and the Berger Singerman team regarding email to and from Akerman and a custom tag in CloudNine.	0.20
	TFC	Email to McKenna Novack regarding commission statements for former advisors.	0.20
	TFC	Review net winner analysis for Anne Coyman.	0.10
	TFC	Review commission statements for former advisors.	1.90
	TFC	Review Cloud9 for documentation regarding the	

			HOURS
		Marshal Seeman's home purchase.	1.40
10/16/2023	JO	Performed net winner analysis over the investments of the parents to a former advisor.	0.80
	JO	Email to Taylor Caruso to discuss findings from the net winner analysis.	0.20
	TFC	Review CloudNine for prior communications of former advisors.	2.70
	TFC	Email to Dan Stermer regarding documentation surrounding Marshal Seeman's home purchase.	0.40
	TFC	Review CloudNine for documentation regarding the Marshal Seeman's home purchase.	0.90
	TFC	Email to Dan Stermer regarding instructions left by Eric Holtz for his children regarding his estate's assets.	0.30
	TFC	Review CloudNine for documentation regarding Eric Holtz's Estate's assets.	1.70
10/17/2023	MN	Research relation between Steve Levenson, New Dawn, and Centurion/Seeman Holtz.	1.90
	MN	Research relation between Pure Rudi LLC and Centurion/Seeman Holtz.	1.10
	MN	Video call with Taylor Caruso regarding CloudNine research of relation between New Dawn and Centurion/Seeman Holtz.	0.30
	MN	Pull evidence of a life insurance policy for Peter Rush from CloudNine.	0.90
	MN	Pull evidence of a life insurance policy for Denice Jennings from CloudNine.	0.70
	MN	Pull evidence of a life insurance policy for Sally Moh from CloudNine.	0.80
	MN	Pull evidence of a life insurance policy for Marjorie Lewis from CloudNine.	0.90
	TFC	Video call with McKenna Novack regarding CloudNine research of relation between New Dawn and Centurion/Seeman Holtz.	0.30
	TFC	Emails to McKenna Novack regarding various research tasks for CloudNine.	0.80
	TFC	Review CloudNine for prior communications of former advisors.	0.60
	TFC	Email to Dan Stermer regarding research into Integrity Aviation's involvement with National Senior Insurance and Centurion.	0.50
	TFC	Review CloudNine regarding Integrity Aviation's involvement with National Senior Insurance and Centurion.	0.40
	TFC	Email to Kerry Burns regarding the status of the various subpoena productions from the life insurance carriers.	0.20
	TFC	Email to Gabria Brenner regarding the producer statements received from various insurance carriers.	0.10
	TFC	Email to McKenna Novack regarding communications of the former advisors.	0.20
	TFC	Email to McKenna Novack regarding life insurance policy sales to a Jeff Baxter entity.	0.20



			HOURS
	TFC	Email to Dan Stermer regarding communications of Daryl Kutner.	0.10
	TFC	Email to Gavin Gaukroger regarding a potential subpoena of the Bank of UT.	0.40
10/18/2023	MN	Research relation between New Dawn, True North, and Centurion/Seeman Holtz.	0.90
	MN	Research advisor emails discussing concerns with Seeman Holtz's business.	3.80
	TFC	Email to William Diab and Mike Niles regarding commissions paid to Joseph Paluzzi and prior communications of Ms. Schindler.	0.60
10/19/2023	GB	Review files from Eric Hotlz for documents relating to structure of his estate, commission payments, and his trust.	3.30
10/20/2023	GB	Review files from Eric Hotlz for documents relating to structure of his estate, commission payments, and his trust.	1.70
	GB	Telephone call with Taylor Caruso regarding Eric Holtz's desktop emails.	0.20
	GB	Research Eric Holtz on CloudNine for evidence of assets and structure of his estate, commission payments, and his trust.	2.60
	JO	Researched on CloudNine to address questions provided by William Diab.	3.50
	TFC	Telephone call with Gabria Brenner regarding Eric Holtz's desktop emails.	0.20
	TFC	Review CloudNine for documentation regarding a life insurance policy sale transaction to a Jeff Baxter entity (AM).	3.20
	TFC	Review CloudNine for documentation regarding a life insurance policy sale transaction to a Jeff Baxter entity (PM).	3.80
10/23/2023	JO	Research on CloudNine to determine payments to an advisor in 2019.	2.30
	JO	Reviewed AlphaStaff's document production in connection with advisor commissions.	0.40
	JO	Email to Taylor Caruso with document found in connection with CloudNine research.	0.20
10/24/2023	TFC	Emails to Gavin Gaukroger regarding CloudNine research into prior life insurance policy transactions.	0.80
	TFC	Email to Gavin Gaukroger regarding the securities account control agreement between Centurion, Teleios, and Wells Fargo.	0.30
	TFC	Email to Jesus Pena regarding attachments for emails in CloudNine.	0.10
	TFC	Review the net winner analysis for Anne and Walter Coyman.	0.70
	TFC	Email to Jack O'Brien regarding the net winner analysis for Anne and Walter Coyman.	0.30
	JO	Responded to comments on the net winner	

			HOURS
		analysis from Taylor Caruso.	0.80
10/25/2023	TFC	Meeting with Jack O'Brien to discuss tasks on advisor research on CloudNine.	0.30
	TFC	Review the "Eric Agent" Excel summaries of advisor referrals.	0.40
	TFC	Prepare a summary of the "Eric Agent" Excel summaries of advisor referrals.	1.60
	TFC	Email to McKenna Novack regarding the post-monitorship insurance commissions.	0.20
	TFC	Email to William Diab and Mike Niles regarding a summary of the "Eric Agent" Excel summaries of advisor referrals.	0.40
	TFC	Review the Eric Holtz trust documents.	0.40
	TFC	Emails to Gabriela Brenner and Gavin Gaukroger regarding the Eric Holtz trust documents.	0.20
	TFC	Email to Gabriela Brenner regarding a summary of the active noteholders referred by former advisors.	0.30
	JO	Meeting with Taylor Caruso to discuss tasks on advisor research on CloudNine.	0.30
	JO	Performed research on CloudNine for commission evidence to advisors.	3.50
10/26/2023	GB	Prepare combined summary of notes for all agents.	0.80
	TFC	Telephone call with Jennifer Jimenez regarding Victor Farias.	0.10
	TFC	Meeting with Jack O'Brien to discuss life insurance research on CloudNine.	0.20
	TFC	Email to Jack O'Brien regarding various research tasks within CloudNine.	0.40
	TFC	Review a summary of the insurance agent reports.	0.30
	TFC	Email to Gabriela Brenner regarding a summary of the insurance agent reports.	0.10
	TFC	Prepare an updated potential recovery summary.	0.80
	TFC	Email to Brian Rich regarding an updated potential recovery summary.	0.20
	TFC	Email to Gavin Gaukroger regarding potential avoidable transfer action against Fan Duel.	0.40
	TFC	Review the bank transaction database for potential avoidable transfer actions.	0.70
	TFC	Email to Whitney Pope regarding New Dawn Finance and known fraudulent activity.	0.40
	TFC	Email to Victor Farias regarding Integrity Aviation.	0.20
	TFC	Email to Dan Stermer regarding communications with Whitney Pope and Victor Farias.	0.20
	JO	Meeting with Taylor Caruso to discuss life insurance research on CloudNine.	0.20
	JO	Performed research on CloudNine researching life insurance commissions paid after the receivership (AM).	1.10
	JO	Performed research on CloudNine researching life insurance commissions paid after the	

			HOURS
		receivership (PM).	1.10
	JO	Performed research on CloudNine researching life insurance commissions paid after the receivership (late PM).	4.00
10/27/2023	MN	Research Beatrice Cayzer life insurance policy.	0.60
	TFC	Emails to Brandon Hall regarding New Dawn Finance.	0.20
	TFC	Email to William Diab regarding historical relationship with Midland IRA and Vantage.	0.50
	JO	Performed research on CloudNine researching life insurance commissions paid after the receivership (AM).	2.50
	JO	Performed research on CloudNine researching life insurance commissions paid after the receivership (late PM).	3.50
10/30/2023	GB	Prepare analysis of investments by advisor and year of origination.	0.90
	GB	Participate in Teams call with Taylor Caruso and Dan Stermer and Brandon Hall/Midland regarding certain investigation related issues and follow up regarding same.	0.40
	JO	Performed research on CloudNine researching life insurance commissions paid after the receivership (AM).	4.00
	JO	Performed research on CloudNine researching life insurance commissions paid after the receivership (PM).	0.70
	TFC	Participate in Teams call with Dan Stermer and Gabriela Brenner and Brandon Hall/Midland regarding certain investigation related issues and follow up regarding same.	0.40
	TFC	Review emails on CloudNine for potential avoidable transfer actions.	3.10
10/31/2023	GB	Prepare analysis of fees paid to Wells Fargo.	3.40
	JO	Performed research on CloudNine for life insurance policies proceeds (AM).	2.50
	JO	Performed research on CloudNine for life insurance policies proceeds (PM).	2.40
	MN	Meeting with Taylor Caruso regarding the Beatrice Cayzer policy.	0.20
	MN	Research policies in CloudNine.	2.60
	TFC	Meeting with McKenna Novack regarding the Beatrice Cayzer policy.	0.20
	TFC	Emails to Gabriela Brenner regarding prior discussions with a former advisor.	0.10
	TFC	Email to Gabriela Brenner regarding a summary of the historical fees paid to Wells Fargo.	0.20
	TFC	Email to McKenna Novack regarding various research tasks on CloudNine.	0.60
	TFC	Review a summary of the historical fees paid to Wells Fargo.	1.10
	TFC	Review historical payments for Eric Holtz's life insurance policies.	0.40

			HOURS
	TFC	Email to Jack O'Brien regarding historical payments for Eric Holtz's life insurance policies.	0.10
	TFC	Review emails on CloudNine for potential avoidable transfer actions.	1.10
11/01/2023	GB	Prepare analysis of fees paid to Wells Fargo.	3.70
	MN	Research policies in CloudNine (AM).	3.50
	MN	Research policies in CloudNine (PM).	2.30
	TFC	Telephone call with Jesus Pena regarding a CloudNine data extract.	0.20
	TFC	Email to Gabria Brenner regarding a summary of the historical fees paid to Wells Fargo.	0.50
	TFC	Review a summary of the historical fees paid to Wells Fargo.	0.90
	TFC	Prepare an updated potential recovery summary.	0.70
	TFC	Email to Dan Stermer regarding an updated potential recovery summary and historical payments for Eric Holtz's life insurance policies.	0.30
	TFC	Review historical payments for Eric Holtz's life insurance policies.	2.20
	TFC	Email to Gabria Brenner updates to the bank transaction database.	0.20
	TFC	Review emails on CloudNine for potential avoidable transfer actions.	2.60
11/02/2023	JO	Performed research on CloudNine for additional research on life insurance policies for Eric Holtz.	0.60
	MN	Research policies in CloudNine.	2.10
	TFC	Review emails on CloudNine for potential avoidable transfer actions.	1.20
	TFC	Review emails on CloudNine for KYC communications with Seeman Holtz and Wells Fargo.	2.70
	TFC	Email to Gavin Gaukroger regarding KYC communications with Seeman Holtz and Wells Fargo and a Wells Fargo fee summary.	0.60
	TFC	Prepare an updated summary of the historical fees paid to Wells Fargo.	0.40
	TFC	Email to Perry Hicks regarding information on Marshal Seeman's 2014 home purchase.	0.20
11/03/2023	GB	Prepare analysis of investments by advisor and year of origination.	0.50
	MN	Research policies in CloudNine.	0.80
	TFC	Review a summary of active notes by advisor referral.	1.10
	TFC	Email to Gabria Brenner regarding a summary of active notes by advisor referral.	0.30
	TFC	Email to Dan Stermer regarding an updated potential recovery summary and historical payments for Eric Holtz's life insurance policies.	0.70
	TFC	Review historical payments for Eric Holtz's	

		HOURS
	life insurance policies.	0.30
	TFC Review CloudNine research from McKenna Novack regarding various bank transactions.	3.20
	TFC Email to McKenna Novack and Gabria Brenner regarding follow ups from CloudNine research.	1.40
	TFC Prepare an updated summary of the historical fees paid to Wells Fargo.	0.30
	TFC Email to Gavin Gaukroger regarding an updated summary of the historical fees paid to Wells Fargo.	0.10
11/06/2023	TFC Telephone call with Gavin Gaukroger regarding the subpoena production from Wells Fargo.	0.30
	TFC Telephone call with Jarrod Shaw, Nellie Hestin, Jonathan Morton, Rachel Tausend, Gavin Gaukroger, and Gabria Brenner regarding the document production from Wells Fargo.	0.30
	TFC Review CloudNine and the bank transaction database for potential avoidable transfer actions.	3.60
	GB Telephone call with Jarrod Shaw, Nellie Hestin, Jonathan Morton, Rachel Tausend, Gavin Gaukroger, and Taylor Caruso regarding the document production from Wells Fargo.	0.30
11/07/2023	TFC Review the advisor referral summaries.	0.30
	TFC Email to Gabria Brenner regarding the advisor referral summaries.	0.10
	TFC Review demand letter to Marshal and Karen Seeman for their 2014 home purchase.	0.40
	TFC Email to Gavin Gaukroger regarding the demand letter to Marshal and Karen Seeman for their 2014 home purchase.	0.10
	TFC Review membership interest purchase agreement for 5th Ave Physicians Services.	0.30
	TFC Email to Gavin Gaukroger regarding an avoidable transfer action against 5th Ave Physicians Services.	0.60
	TFC Review emails and documents from Cloud9 regarding the prior credit agreement with DZ Bank and related interest payment documentation.	1.50
	TFC Email to McKenna Novack and Gabria Brenner regarding the prior credit agreement with DZ Bank and related interest payment documentation.	0.40
11/08/2023	MN Prepare the Shutts & Bowen invoice schedule.	1.40
	MN Prepare DZ Bank funding transactions schedule.	0.40
	MN Research Boies policy ownership.	2.20
	MN Meeting with Taylor Caruso regarding Shutts & Bowen's invoice schedule.	0.20
	TFC Participate in Teams call with Pat O'Malley (partial), Dan Stermer, Gabria Brenner, Brian Rich, Gavin Gaukroger, and Michael Niles (partial) regarding recovery related	

			HOURS
		issues/status, claims related issues/status, and overall receivership related issues and next steps.	1.20
	TFC	Review CloudNine for invoices from Shutts & Bowen.	1.10
	TFC	Email to Dan Stermer regarding the Shutts & Bowen invoice summary and payment of legal fees by CISG for third party defendants.	0.70
	TFC	Review the Shutts & Bowen invoice summary and comparison to amounts paid by CISG.	0.80
	TFC	Email to Brian Rich regarding a written summary of the claims reconciliation process.	0.10
11/09/2023	TFC	Email to Dan Stermer regarding CloudNine research of commissions for David Coyman.	0.30
	TFC	Review CloudNine for email communications between Brian Schwartz, Alan Hodge, and individuals from the Vernon Litigation.	0.80
	TFC	Emails to Dan Stermer and Brian Rich regarding email communications between Brian Schwartz, Alan Hodge, and individuals from Vernon litigation.	0.30
11/14/2023	TFC	Email to Dan Stermer regarding an export of the meta data from CloudNine.	0.20
11/16/2023	TFC	Review CloudNine for additional potential avoidable transfer actions.	0.90
11/17/2023	TFC	Review CloudNine for additional potential avoidable transfer actions.	1.20
11/21/2023	TFC	Email to Jesus Pena regarding an export of meta data from CloudNine.	0.10
11/22/2023	TFC	Email to Gavin Gaukroger regarding a list of entities for the OFR bank statement production.	0.20
11/27/2023	MN	Research policies in CloudNine.	2.40
11/30/2023	GB	Teams call with Adam Ruttenberg and Gavin Kaukroger regarding settlement communication with Pelican Capital.	0.50
12/15/2023	GB	Download and review Shutts & Bowen subpoena documents.	1.10
12/19/2023	GB	Review download issue for document production from Wells Fargo.	0.50
	GB	Prepare necessary support regarding settlement communication with Pelican Capital.	0.90
12/20/2023	GB	Prepare necessary support regarding settlement communication with Pelican Capital.	1.50
12/28/2023	TFC	Email to Dan Stermer regarding the TLO report	

			HOURS
		for Brian Schwartz.	0.10
01/02/2024	TFC	Email to Mike Niles regarding personal information for Brian Schwartz.	0.10
	TFC	Review records to gather personal information for Brian Schwartz.	0.30
01/05/2024	GB	Prepare necessary support regarding settlement communication with Pelican Capital.	1.90
	TFC	Email to Gabria Brenner regarding cash tracing examples for the Pelican dispute.	0.20
	TFC	Review the cash tracing examples for the Pelican dispute.	0.30
01/08/2024	GB	Prepare necessary support regarding settlement communication with Pelican Capital.	0.60
01/09/2024	GB	Review document productions related to Brian Schwartz and Ameritonian accounts.	1.60
01/10/2024	TFC	Email to Gabria Brenner regarding the latest Wells Fargo document production.	0.20
01/12/2024	GB	Telephone call with Taylor Caruso regarding document production for Brian Schwartz and review of Katchis notes.	0.20
	GB	Review and prepare summary of Katchis promissory notes.	0.90
	TFC	Telephone call with Gabria Brenner regarding the Katchis demand letters and documents provided by the Katchis family.	0.20
01/16/2024	TFC	Email to Brian Rich regarding a summary of Katchis family promissory notes.	0.20
	TFC	Prepare an updated summary of the Katchis family promissory notes.	0.60
	TFC	Review ownership of SH Insurance Services LLC.	0.10
01/17/2024	TFC	Video call with Mike Niles regarding the email search terms for Akerman.	0.20
01/18/2024	TFC	Review emails with Cloud9 for communications between the Katchis family and Marshal Seeman.	1.30
	TFC	Emails to Dan Stermer and the Berger Singerman team regarding Cloud9 email communications between the Katchis family and Marshal Seeman.	0.70
	TFC	Review CloudNine for email addresses used by Jeff Baxter.	0.50
	TFC	Email to Gavin Gaukroger for email addresses used by Jeff Baxter.	0.10
01/19/2024	GB	Download Wells Fargo Document production.	0.10
	TFC	Emails to Gavin Gaukroger regarding interest APR for the Katchis loans.	0.10
01/24/2024	TFC	Discussion with Gabria Brenner regarding the	

			HOURS
		tracing exhibit for Pelican Capital.	0.30
	TFC	Email to Gabria Brenner regarding the latest document production from Wells Fargo.	0.10
	TFC	Review the Pelican bank transaction analysis.	0.80
	TFC	Emails to Gabria Brenner regarding the Pelican bank transaction analysis.	0.50
	GB	Download and review Wells Fargo Document production.	0.80
	GB	Prepare necessary support regarding settlement communication with Pelican Capital.	3.30
	GB	Discussion with Taylor Caruso regarding the tracing exhibit for Pelican Capital.	0.30
01/25/2024	TFC	Discussion with Gabria Brenner regarding the Huling compensation summary.	0.30
	TFC	Review the Huling compensation summary.	0.50
	TFC	Emails to Gabria Brenner regarding the Huling compensation summary.	0.20
	TFC	Review the updated Pelican bank transaction analysis.	0.20
	GB	Prepare commission and salary schedule for Richard Huling.	2.70
	GB	Prepare necessary support regarding settlement communication with Pelican Capital.	0.30
	GB	Discussion with Taylor Caruso regarding the Huling compensation summary.	0.30
01/26/2024	TFC	Emails to Gabria Brenner regarding a reconciliation of payroll payments to Alpha Staff and the bank transaction details.	0.20
	GB	Prepare commission and salary schedule for Richard Huling.	1.10
	GB	Search CloudNine for information on account ending in x2677.	0.50
01/30/2024	TFC	Telephone call with Nellie Hestin and Gavin Gaukroger regarding the Wells Fargo subpoena.	0.20
	TFC	Review the former advisor compensation analysis.	0.50
	TFC	Email to Gabria Brenner regarding the former advisor compensation analysis.	0.20
	GB	Prepare compensation analysis for former advisors.	1.60
02/01/2024	GB	Prepare compensation analysis for former advisors.	2.20
02/06/2024	GB	Meeting with Taylor Caruso regarding the former advisor compensation analysis.	1.30
	GB	Meeting with Taylor Caruso and Pat O'Malley regarding the former advisor compensation analysis.	0.30
	TFC	Meeting with Gabria Brenner regarding the former advisor compensation analysis.	1.30
	TFC	Meeting with Pat O'Malley and Gabria Brenner regarding the former advisor compensation	



		HOURS
	analysis.	0.30
TFC	Prepare an updated compensation analysis for the former advisors.	0.80
PJO	Meeting with T. Caruso and G. Brenner regarding the former advisor compensation analysis.	0.30
02/07/2024	GB Prepare compensation analysis for former advisors.	2.30
	GB Discussion with Taylor Caruso regarding the former advisor compensation analysis.	0.40
	TFC Discussion with Gabria Brenner regarding the former advisor compensation analysis.	0.40
	TFC Emails to Gabria Brenner regarding an updated advisor compensation analysis.	0.30
	TFC Review the updated advisor compensation analysis.	0.60
02/08/2024	GB Prepare compensation analysis for former advisors.	2.80
	GB Discussion with Taylor Caruso regarding the former advisor compensation analysis.	0.60
	GB Meeting with Taylor Caruso to evaluate possible commissions paid to employees on the investor notes.	0.40
	GB Research on CloudNine for evidence of commission paid to former advisors.	1.70
	GB Meeting with Taylor Caruso regarding commission schedule for Coyman and tracing of payments.	0.30
	GB Meeting with Taylor Caruso regarding commission schedule for Coyman and tracing of payments.	0.40
	GB Meeting with Dan Stermer, Taylor Caruso and Pat O'Malley with regard to advisor compensation analysis.	0.50
	TFC Discussion with Gabria Brenner regarding the former advisor compensation analysis.	0.60
	TFC Meeting with G. Brenner to evaluate possible commissions paid to employees on the investor notes.	0.40
	TFC Telephone call with InfusionSoft/Keep IT team regarding data availability.	0.20
	TFC Meeting with Dan Stermer, Gabria Brenner and Pat O'Malley with regard to advisor compensation analysis.	0.50
	TFC Meeting with Gabria Brenner regarding commission schedule for Coyman and tracing of payments.	0.40
	TFC Meeting with Gabria Brenner regarding commission schedule for Coyman and tracing of payments.	0.30
	TFC Email to Dan Stermer regarding the Eric Holtz agent report summary.	0.20
	TFC Email to Gabria Brenner regarding the Dave Coyman commissions calculation.	0.30
	TFC Email to Betty Koltis of Alpha Staff regarding additional records requests.	0.40
	TFC Review and research CloudNine for additional	

			HOURS
		information regarding advisor commissions.	1.40
	PJO	Review of analysis of investor note referrals.	0.20
	PJO	Meeting with T. Caruso and G. Brenner to evaluate possible commissions paid to employees on the investor notes.	0.40
	PJO	Telephone call with B. Rich regarding status of the analysis of commissions paid for referrals of note investors.	0.20
	PJO	Video call with D. Stermer, T. Caruso, and G. Brenner with regard to advisor compensation analysis.	0.50
02/09/2024	GB	Prepare reconciliation of AlphaStaff payments.	2.20
	GB	Video call with Pat O'Malley, Taylor Caruso, Dan Stermer and Brian Rich, Gavin Gaukroger, Michael Niles, and William Diab with regard to advisor compensation analysis.	0.80
	GB	Additional video call with Taylor Caruso and Dan Stermer regarding advisor compensation analysis and research.	0.30
	GB	Video call with Taylor Caruso regarding reconciliation of AlphaStaff payments.	0.60
	GB	Telephone call with Jesus Pena regarding CloudNine search functionality.	0.30
	TFC	Video call with Gabria Brenner regarding reconciliation of the Alpha Staff payments.	0.60
	TFC	Video call with Pat O'Malley regarding communications from Alpha Staff and advisor commission payments.	0.20
	TFC	Additional video call with Dan Stermer and Gabria Brenner regarding the advisor compensation analysis and research.	0.30
	TFC	Emails to Jennifer Jimenez regarding W-2s from Alpha Staff.	0.20
	TFC	Email to Dan Stermer regarding feedback from Jennifer Jimenez on her compensation from Alpha Staff.	0.30
	TFC	Prepare an updated Eric Agent report summary.	1.40
	TFC	Email to Dan Stermer regarding the updated Eric Agent report summary.	0.30
	PJO	Video call with D. Stermer, T. Caruso, and G. Brenner and B. Rich, G. Gaukroger, M. Niles, and W. Diab with regard to advisor compensation analysis.	0.80
02/12/2024	GB	Prepare payroll reconciliation for Jennifer Jimenez.	1.20
	TFC	Video call with Dan Stermer regarding Alpha Staff call and follow up regarding same.	0.20
	TFC	Video call with Betty Koltis, Ana Chavez, and William Diab regarding additional information requests from Alpha Staff.	0.40
	TFC	Video calls with Pat O'Malley regarding discussions with Alpha Staff.	0.40
	TFC	Email to Betty Koltis regarding additional information requests from Alpha Staff.	0.30

		HOURS
	TFC Review and research emails on CloudNine for employment agreements with former advisors.	1.10
	TFC Review and research emails on CloudNine for information as to how commissions were paid to former advisors (AM).	2.60
	TFC Review and research emails on CloudNine for information as to how commissions were paid to former advisors (PM).	1.10
	PJO Review of payroll reconciliations to AlphaStaff reports and cash activity.	0.20
	PJO Video calls with T. Caruso regarding calls with AlphaStaff.	0.40
02/13/2024	GB Discussion with Taylor Caruso regarding reconciliation of Alphastaff payroll registers.	0.20
	GB Meeting with Pat O'Malley and Taylor Caruso regarding the advisor compensation analysis.	0.50
	GB Meeting with Taylor Caruso regarding the advisor compensation analysis.	0.80
	TFC Discussion with Gabria Brenner regarding reconciliation of Alpha Staff payroll registers.	0.20
	TFC Meeting with Pat O'Malley and Gabria Brenner regarding the advisor compensation analysis.	0.50
	TFC Meeting with Gabria Brenner regarding the advisor compensation analysis.	0.80
	TFC Email to Betty Koltis regarding additional information requests from Alpha Staff.	0.20
	TFC Email to Dan Stermer regarding emails identified in CloudNine discussing commissions paid to former advisors.	0.30
	PJO Review of emails located by T. Caruso related to paying commissions on investor notes.	0.20
	PJO Meeting with T. Caruso and G. Brenner regarding further analysis of commissions paid to employees on investor notes.	0.50
02/14/2024	GB Meeting with Pat O'Malley and Taylor Caruso regarding the advisor compensation analysis.	0.50
	GB Prepare compensation analysis for advisors.	3.50
	GB Prepare compensation summary for Michael Taylor.	0.80
	GB Discussions with Taylor Caruso regarding compensation paid to the former advisors.	0.20
	TFC Meeting with Pat O'Malley and Gabria Brenner regarding compensation paid to the former advisors.	0.50
	TFC Discussions with Gabria Brenner regarding compensation paid to the former advisors.	0.20
	TFC Emails to Gabria Brenner regarding compensation paid to Michael Taylor and other former advisors.	0.40
	TFC Review emails on CloudNine for how compensation was paid to Michael Taylor.	0.80
	PJO Meeting with T. Caruso and G. Brenner regarding further analysis of commissions paid to	

			HOURS
		employees on investor notes and prepare for later call with the Receiver and counsel.	0.50
PJO		Review of list of documents on E. Holtz's computer to identify those that would be helpful to identify commissions paid on investor notes.	0.20
02/15/2024	GB	Prepare compensation summary for Michael Taylor.	1.00
	GB	Meeting with Taylor Caruso regarding compensation paid to the former advisors.	1.30
	GB	Prepare payroll reconciliation for Alphstaff registers.	2.40
	TFC	Meeting with Gabria Brenner regarding compensation paid to the former advisors.	1.30
	TFC	Discussion with Pat O'Malley regarding compensation paid to Dan Tepper.	0.10
	TFC	Review the compensation summary for Michael Taylor.	0.40
	TFC	Email to Gabria Brenner regarding the compensation summary for Michael Taylor.	0.20
	TFC	Email to Ana Chavez regarding information requests from Alpha Staff.	0.30
02/16/2024	GB	Prepare payroll reconciliation for Alphstaff registers.	3.50
	GB	Prepare compensation summary for Michael Taylor.	0.60
02/19/2024	GB	Prepare compensation summary for Michael Taylor.	0.40
	GB	Prepare compensation analysis for advisors.	1.00
02/20/2024	TFC	Review the compensation summary exhibit for Michael Taylor.	0.30
	TFC	Email to Gabria Brenner regarding the compensation summary exhibit for Michael Taylor.	0.10
	GB	Prepare compensation analysis for advisors.	2.70
02/22/2024	TFC	Review the AlphaStaff payment reconciliation.	1.20
	TFC	Email to Gabria Brenner regarding the AlphaStaff payment reconciliation.	0.40
	GB	Prepare payroll reconciliation for AlphaStaff registers.	0.80
02/23/2024	TFC	Review advisor appointment tracker.	0.20
	TFC	Email to Dan Stermer regarding the advisor appointment tracker.	0.10
	GB	Prepare updated bank transaction database.	1.80
	GB	Prepare payroll reconciliation for AlphStaff registers.	0.50
	GB	Prepare compensation analysis for advisors.	1.20
02/26/2024	TFC	Telephone call with Gabria Brenner regarding the AlphaStaff reconciliation.	0.20

			HOURS
	GB	Prepare compensation analysis for advisors.	1.20
	GB	Telephone call with Taylor Caruso regarding the AlphaStaff reconciliation.	0.20
02/27/2024	TFC	Email to Mike Niles regarding commissions paid to a former advisor.	0.30
03/01/2024	TFC	Email to Dan Stermer regarding payments to Grey Swan, Kevin Brand, and Mike Manley.	0.40
	TFC	Review the bank transaction database and Purchase and sale agreements for payment details to Grey Swan, Kevin Brand, and Mike Manley.	1.30
03/04/2024	GB	Prepare compensation analysis for advisors.	1.00
03/05/2024	TFC	Video call with Dan Stermer and Brian Rich and Michael Niles regarding 5th Avenue Physicians and settlement discussions regarding same and additional discussions regarding Katchis settlement.	0.20
	GB	Research entities in the AlphaStaff payroll register on CloudNine.	2.00
03/07/2024	TFC	Review the records received from AlphaStaff.	0.40
	TFC	Email to Ana Chavez regarding missing records from AlphaStaff.	0.60
	TFC	Review the listing of former advisors and associated companies.	0.20
	TFC	Email to Gabria Brenner regarding an updated reconciliation of the Alpha Staff payroll registers.	0.10
	GB	Prepare compensation analysis for advisors.	0.60
03/12/2024	TFC	Discussion with Gabria Brenner regarding Wells Fargo timeline and research.	0.10
	GB	Discussion with Taylor Caruso regarding Wells Fargo timeline and research.	0.10
	GB	Research evidence of Wells Fargo involvement with irrevocable life insurance trusts and securities intermediary on CloudNine and prepare timeline.	3.50
03/13/2024	GB	Research evidence of Wells Fargo involvement with irrevocable life insurance trusts and securities intermediary on CloudNine and prepare timeline.	1.80
	GB	Prepare rolling debt summary for notes.	1.40
03/19/2024	TFC	Review the "Alex Report" files calculating commissions on investor note sales.	0.40
	TFC	Email to William Diab regarding the "Alex Report" files calculating commissions on investor notes.	0.30
03/20/2024	TFC	Email to Pat O'Malley regarding a summary of	

			HOURS
		the interest rates paid to investors of the various PPEs.	0.20
03/21/2024	TFC	Prepare an updated listing of the interest rates offered by the various PPEs.	1.30
	TFC	Review the Private Placement Memorandum for the older PPEs.	0.40
	TFC	Email to Pat O'Malley regarding an updated listing of the interest rates offered by the various PPEs.	0.10
03/22/2024	TFC	Video call with Pat O'Malley regarding investor interest rates for the various PPEs.	0.10
	PJO	Video call with T. Caruso regarding investor interest rates for the various PPEs.	0.10
03/25/2024	TFC	Prepare a reconciliation of the intercompany activity within the Wells Fargo accounts (AM).	3.10
	TFC	Prepare a reconciliation of the intercompany activity within the Wells Fargo accounts (PM).	1.20
	JO	Review Wells Fargo production for Customer Information Forms.	0.60
	JO	Review mediation statement from Greenspoon Marder regarding the upcoming mediation.	0.30
03/26/2024	TFC	Telephone call with Mike Niles regarding a summary of total compensation paid to the former advisors.	0.20
	TFC	Prepare an updated advisor total compensation analysis.	2.30
03/27/2024	TFC	Prepare an updated advisor total compensation analysis.	2.70
	TFC	Emails to Mike Niles regarding an updated total compensation analysis for the former advisors.	0.50
	TFC	Email to William Diab regarding communications from Rose Schindler and compensation paid to the former advisors.	0.40
	TFC	Prepare a reconciliation of the intercompany activity within the Wells Fargo accounts.	1.60
03/28/2024	TFC	Prepare a reconciliation of the intercompany activity within the Wells Fargo accounts.	3.10
03/29/2024	TFC	Email to Dan Stermer regarding the former advisor compensation analysis.	0.60
	TFC	Prepare a reconciliation of the intercompany activity within the Wells Fargo accounts (AM).	3.30
	TFC	Prepare a reconciliation of the intercompany activity within the Wells Fargo accounts (PM).	1.70
04/05/2024	TFC	Review unreconciled intercompany cash activity within the bank transaction database.	1.40
04/08/2024	TFC	Email to Jesus Pena regarding access to CloudNine.	0.10

			HOURS
04/09/2024	TFC	Prepare an exhibit of net transaction activity through Centurion Insurance Services Group's US Bank account.	0.40
	TFC	Emails to William Diab regarding login information for CloudNine.	0.10
04/23/2024	TFC	Prepare a summary of cash transactions with Stanley Sussman.	0.70
04/24/2024	TFC	Video call with Thomas Jeremiassen and Spencer Ferrero regarding flowcharts for possible Wells Fargo litigation.	0.30
	TFC	Prepare a summary of total compensation paid to Jason Sussman.	0.60
	TFC	Email to Mike Niles regarding a total compensation summary for Jason Sussman.	0.10
	TPJ	Review of analysis of flow of funds for Wells Fargo litigation.	0.80
	TPJ	Call with Spencer Ferrero regarding regarding flow of funds analysis for Wells Fargo litigation preparation.	0.20
	TPJ	Call with Spencer Ferrero and Taylor Caruso regarding regarding flow of funds analysis for Wells Fargo litigation preparation.	0.30
	TPJ	Call with Spencer Ferrero and Taylor Caruso regarding analysis of flow of funds for Wells Fargo litigation support.	0.50
	SGF	Telephone call with Thomas Jeremiassen regarding flowcharts for possible Wells Fargo litigation.	0.20
	SGF	Telephone call with Thomas Jeremiassen and Taylor Caruso regarding flowcharts for possible Wells Fargo litigation.	0.30
	04/25/2024	TFC	Email to Dan Stermer regarding requests to Jeff Baxter for information regarding payments to his law firm.
SGF		Review and analyze sources and uses database to identify possible transfers from newer funds to older funds for investor distributions.	2.30
SGF		Review and analyze sources and uses database to identify possible transfers for sources of funds for investor distributions.	1.90
04/26/2024	TFC	Telephone call with Spencer Ferrero regarding supporting information for the Wells Fargo litigation.	0.30
	TFC	Prepare an updated bank transaction database.	2.90
	TFC	Prepare cash flow exhibits for the Wells Fargo litigation.	0.80
	SGF	Telephone call with Taylor Caruso regarding supporting information for the Wells Fargo litigation.	0.30
	SGF	Review and analyze sources and uses database to identify possible transfers from newer funds to	

			HOURS
		older funds for investor distributions.	2.70
04/27/2024	TFC	Prepare an updated bank transaction database.	2.50
	TFC	Prepare cash flow exhibits for the Wells Fargo litigation.	1.60
04/28/2024	PJO	Video call with T. Caruso regarding exhibits for the Wells Fargo Litigation.	0.60
	TFC	Prepare an updated bank transaction database.	3.20
	TFC	Prepare cash flow exhibits for the Wells Fargo litigation.	2.80
	TFC	Video call with Pat O'Malley regarding exhibits for the Wells Fargo litigation.	0.60
04/29/2024	SGF	Review and analyze sources and uses database to identify possible transfers from newer funds to older funds for investor distributions.	2.20
	SGF	Review and analyze bank statements to identify possible transfers from newer funds to older funds for investor distributions.	2.10
04/30/2024	SGF	Review and analyze sources and uses database to identify possible transfers from newer funds to older funds for investor distributions.	2.80
	SGF	Review and analyze bank statements to identify possible transfers from newer funds to older funds for investor distributions.	2.90
	SGF	Create exhibit for example of transfer from newer fund to older funds for investor distributions.	0.90
05/01/2024	TFC	Video call with Spencer Ferrero regarding cash tracing examples for the Wells Fargo litigation.	0.80
	TFC	Email to Dan Stermer regarding payments to National Financial Servicers, an IRA administrator.	0.30
	TFC	Prepare a summary of payments to National Financial Services.	0.20
	SGF	Telephone call with Taylor Caruso regarding review of possible transfers from newer funds to older funds for investor distributions.	0.80
	SGF	Review and analyze sources and uses database to identify possible transfers from newer funds to older funds for investor distributions.	2.60
	SGF	Review and analyze bank statements to identify possible transfers from newer funds to older funds for investor distributions.	2.80
	SGF	Create exhibit for example of transfer from newer fund to older funds for investor distributions.	0.60
05/02/2024	TFC	Email to Spencer Ferrero regarding transaction documents with South Cove Capital.	0.20
	RCD	Review and analyze current policy folders (A-G) for ILIT documents related to the Wells Fargo	



			HOURS
		litigation.	2.50
	RCD	Review and analyze current policy folders (G-L) for ILIT documents related to the Wells Fargo litigation.	2.40
	RCD	Review and analyze current policy folders (L-W) for ILIT documents related to the Wells Fargo litigation.	2.80
05/03/2024	TPJ	Review of cash tracing examples, and e-mails and calls with Spencer Ferrero regarding same.	1.10
	SGF	Telephone call with Thomas Jeremiassen regarding newer fund to older fund analysis.	0.10
	SGF	Review and analyze sources and uses database to identify possible transfers from newer funds to older funds for investor distributions.	1.80
	SGF	Review and analyze bank statements to identify possible transfers from newer funds to older funds for investor distributions.	2.20
05/06/2024	TFC	Review listing of life insurance policies held in ILITs.	0.40
05/08/2024	JO	Review Wells Fargo document production for beneficial ownership form.	1.60
05/31/2024	TFC	Telephone call with Andrew Cook of Fidelity regarding payments to National Financial Services LLC.	0.20
	TFC	Email to Dan Stermer regarding payments to National Financial Services and process to contact them.	0.60
	TFC	Prepare an exhibit of payments to National Financial Services.	0.40
06/04/2024	JSC	Meeting with Taylor Caruso regarding process to gather information on wire transfer payments made by Baxter.	0.40
	JSC	Review wire confirmations and gather information of wires submitted by Baxter.	1.80
	JSC	Review wire confirmations and gather information of wires submitted by Baxter.	2.80
	TFC	Meeting with Josh Cann regarding process to gather information on wire transfer payments made by Baxter.	0.40
06/05/2024	TFC	Prepare a draft letter to Fidelity regarding the payments to National Financial Services LLC.	0.80
	TFC	Emails to Dan Stermer regarding a draft letter to Fidelity regarding the payments to National Financial Services LLC.	0.20
06/06/2024	JSC	Review wire confirmations and gather information of wires submitted by Baxter.	1.00
	JSC	Review wire confirmations and gather information of wires submitted by Baxter.	1.40

			HOURS
	TFC	Prepare a summary of payments made by Baxter on behalf of the Receivership entities.	0.40
	TFC	Prepare a letter to Fidelity regarding payments to National Financial Services LLC.	0.80
	TFC	Emails to Dan Stermer regarding a draft letter to Fidelity regarding payments to National Financial Services LLC.	0.20
06/07/2024	JSC	Review wire confirmations and gather information of wires submitted by Baxter.	2.10
	JSC	Analysis of McNally wire of \$3 million made by Baxter.	0.50
	JSC	More analysis of the \$3 million wire and analysis of \$785,000 wire made by Baxter.	1.20
	JSC	Telephone calls with Taylor Caruso regarding Cloud9 Research of payments by Baxter.	0.50
	TFC	Telephone calls with Josh Cann regarding Cloud9 research of payments made by Baxter.	0.50
	TFC	Review the summary of payments made by Baxter on behalf of the Receivership entities.	0.40
	TFC	Email to Josh Cann regarding the summary of payments made by Baxter on behalf of the Receivership entities.	0.10
06/10/2024	TFC	Review data from investor checks deposited into various PPEs.	0.20
	TFC	Emails to Josh Cann regarding data from investor checks deposited into various PPEs.	0.10
	JSC	Converted Memos from checks stored in the Wells Fargo Productions to Excel from PDF	4.50
06/12/2024	TFC	Discussions with Josh Cann regarding a reconciliation of life insurance premium payments.	0.70
	TFC	Review records regarding the Pappou life insurance policy and associated premium payments.	0.60
	TFC	Email to Josh Cann regarding a life insurance policy premium reconciliation.	0.20
	TFC	Prepare a draft letter to National Financial Services LLC.	0.40
	TFC	Emails to Dan Stermer regarding the draft letter to National Financial Services LLC.	0.20
	TFC	Prepare an updated exhibit of payments to National Financial Services LLC.	0.30
	TFC	Prepare a life insurance policy premium payment reconciliation.	0.30
	JSC	Meetings with Taylor Caruso regarding the reconciliation of bank transfers made by NSI for insurance premiums.	0.70
	JSC	Reconciling bank transfers made by NSI for insurance premiums	2.80
	JSC	Reconciling bank transfers made by NSI for insurance premiums	4.50
06/13/2024	TFC	Discussions with Josh Cann regarding a	

			HOURS
		reconciliation of life insurance premium payments.	0.20
	JSC	Discussion with Taylor Caruso regarding reconciliation of life insurance payments	0.20
	JSC	Reconciling bank transfers made by NSI for insurance premiums	3.30
	JSC	Reconciling bank transfers made by NSI for insurance premiums	4.50
06/14/2024	TFC	Video call with Josh Cann regarding the life insurance policy payment reconciliation.	0.30
	JSC	Reconciling bank transfers made by NSI for insurance premiums	4.00
	JSC	Reconciling bank transfers made by NSI for insurance premiums	1.40
	JSC	Video call with Taylor Caruso regarding life insurance reconciliation	0.30
06/17/2024	TFC	Email to Dan Stermer regarding life insurance premium payments for Chris Pappou and review of emails from Cloud9.	1.10
	TFC	Review and gather emails regarding premiums payments made by ILITs prior to 2015 from CloudNine.	1.20
06/18/2024	TFC	Discussions with Josh Cann regarding the insurance premium payment reconciliation.	0.30
	TFC	Email to Dan Stermer regarding data from the memo field of investor check deposits.	0.10
	TFC	Review the data from the memo field of investor check deposits.	0.30
	TFC	Review and gather emails regarding premiums payments made by ILITs prior to 2015 from Cloud9.	3.70
	JSC	Discussions with Taylor Caruso regarding the fixed asset reconciliation.	0.30
	JSC	Prepare reconciliation of bank transfers for insurance premium payments.	2.70
06/19/2024	TFC	Meeting with Josh Cann regarding the life insurance policy premium payment reconciliation.	1.00
	TFC	Email to Laruen Lakeberg regarding a TLO report for Kesef Group LLC.	0.10
	TFC	Review TLO report for the Kesef Group LLC.	0.20
	TFC	Email to Mike Niles regarding status of the various insurance carrier subpoenas.	0.30
	TFC	Prepare an updated insurance carrier subpoena tracker.	0.50
	TFC	Email to Dan Stermer regarding Cloud9 research of the life insurance policy for Ernest Redish.	1.20
	TFC	Review and gather emails regarding premiums payments made by ILITs prior to 2015 from Cloud9.	3.10
	JSC	Meeting with Taylor Caruso regarding the life insurance policy premium payment	

			HOURS
		reconciliation.	1.00
	JSC	Prepare reconciliation of bank transfers for insurance premium payments.	0.50
	JSC	Prepare reconciliation of bank transfers for insurance premium payments.	4.30
06/20/2024	TFC	Discussions with Josh Cann regarding the life insurance premium payment reconciliation.	0.30
	JSC	Prepare reconciliation of bank transfers for insurance premium payments.	3.70
	JSC	Discussions with Taylor Caruso regarding the life insurance premium payment reconciliation.	0.30
	JSC	Prepare reconciliation of bank transfers for insurance premium payments.	4.00
06/21/2024	TFC	Review and gather emails regarding premiums payments made by ILITs prior to 2015 from Cloud9.	3.60
	TFC	Telephone call with Josh Cann regarding the life insurance premium payment reconciliation.	0.40
	TFC	Email to Josh Cann regarding process to review life insurance premium payments by ILITs.	0.20
	JSC	Prepare reconciliation of bank transfers for insurance premium payments.	4.00
	JSC	Telephone call with Taylor Caruso regarding the life insurance premium payment reconciliation.	0.40
	JSC	Prepare reconciliation of bank transfers for insurance premium payments.	3.60
06/24/2024	JSC	Prepare reconciliation of insurance premium payments from bank transfer database.	2.00
	JSC	Prepare reconciliation of insurance premium payments from bank transfer database.	1.00
	JSC	Review check payments for the life insurance premium payment reconciliation.	3.50
	TFC	Review and gather emails regarding premiums payments made by ILITs prior to 2015.	2.60
06/25/2024	JSC	Review check payments for the life insurance premium payment reconciliation.	3.50
	JSC	Review check payments for the life insurance premium payment reconciliation.	4.40
	JSC	Discussions with Taylor Caruso regarding the insurance premium payment reconciliation.	0.20
	TFC	Discussions with Josh Cann regarding the insurance premium payment reconciliation.	0.20
	TFC	Prepare an updated insurance policy premium payment reconciliation.	0.60
	TFC	Email to Josh Cann regarding next steps for the insurance policy premium payment reconciliation.	0.20
06/26/2024	JSC	Review check payments for the life insurance premium payment reconciliation.	0.60
	JSC	Prepare reconciliation of insurance premiums from the general ledger.	1.50

		HOURS
	JSC Meeting with Taylor Caruso regarding the insurance premium payment reconciliation.	0.40
	JSC Prepare review of non-current policies from OneDrive records.	1.00
	JSC Prepare review of non-current policies from OneDrive records.	0.20
	JSC Meeting with Taylor Caruso regarding the review process for the insurance carrier subpoena records and further updated to the insurance premium payment reconciliation.	0.50
	JSC Prepare review of non-current policies through subpoena records.	3.80
	TFC Meeting with Josh Cann regarding the insurance premium payment reconciliation.	0.40
	TFC Meeting with Josh Cann regarding the review process for the insurance carrier subpoena records and further updated to the insurance premium payment reconciliation.	0.50
06/27/2024	JSC Prepare review of non-current policies through subpoena records.	4.00
	JSC Prepare review of non-current policies through subpoena records.	3.00
	JSC Discussion with Taylor Caruso regarding the insurance premium payment reconciliation and the Neudorfer policy investigation.	0.30
	JSC Review emails on CloudNine regarding the Neudorfer life insurance policy.	1.10
	TFC Discussion with Josh Cann regarding the insurance premium payment reconciliation and the Neudorfer policy investigation.	0.30
06/28/2024	JSC Review emails on CloudNine regarding the Neudorfer life insurance policy.	4.00
	JSC Review emails on CloudNine regarding the Neudorfer life insurance policy.	4.00
07/01/2024	JSC Prepare reconciliation of insurance premium payments from subpoena documents.	4.00
	JSC Prepare reconciliation of insurance premium payments from subpoena documents.	4.00
07/02/2024	JSC Prepare reconciliation of insurance premium payments from subpoena documents.	3.00
07/08/2024	JSC Review of premium history for missing insurance premium payments.	0.40
	JSC Discussion with Taylor Caruso regarding the progression of the Neudorfer life insurance policy investigation.	0.10
	JSC Review emails on CloudNine regarding the Neudorfer life insurance policy.	0.50
	JSC Review emails on CloudNine regarding the Neudorfer life insurance policy.	2.00
	JSC Review emails on CloudNine regarding missing premium payments from premium histories.	2.50

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	TFC	Discussion with Josh Cann regarding the progression of the Neudorfer life insurance policy investigation.	0.10
	TFC	Review the Neudorfer life insurance policy investigation.	0.40
	TFC	Email to Josh Cann regarding the Neudorfer life insurance policy investigation.	0.10
	TFC	Review the feedback from various life insurance carriers pursuant to the subpoenas.	0.70
	TFC	Emails to Kerry Burns regarding feedback from various life insurance carriers pursuant to the subpoenas.	0.30
07/09/2024	JSC	Review emails on CloudNine regarding missing premium payments from premium histories.	2.30
	JSC	Review emails on CloudNine regarding missing premium payments from premium histories.	0.90
	JSC	Review of missing premium payments from premium history.	1.50
07/10/2024	JSC	Review of missing premium payments from premium history.	2.50
	JSC	Review emails on CloudNine regarding missing premium payments from wire transactions and other records.	2.40
	JSC	Discussions with Taylor Caruso regarding status of the life insurance policy premium payment reconciliation.	0.30
	JSC	Prepare summary of missing payments from general ledger and wire histories from CloudNine.	1.20
	TFC	Discussions with Josh Cann regarding status of the life insurance policy premium payment reconciliation.	0.30
	TFC	Email to Brett Von Borke regarding a letter from an investor and the Vantage's role as the IRA administrator.	0.40
	TFC	Review a letter from an investor regarding their Vantage accounts.	0.30
07/11/2024	JSC	Prepare summary of missing payments from general ledger and wire histories from CloudNine.	1.00
	JSC	Prepare summary of missing payments from general ledger and wire histories from CloudNine.	1.50
	JSC	Prepare summary of missing payments from general ledger and wire histories from CloudNine.	4.70
07/12/2024	JSC	Prepare summary of missing payments from general ledger and wire histories from CloudNine.	1.00
	JSC	Discussion with Taylor Caruso regarding premium payment reconciliation and payment categories.	0.30
	JSC	Prepare summary of missing payments from	

			HOURS	
		general ledger and wire histories of various years from CloudNine.	2.70	
	JSC	Review payor categories for relevance in insurance premium reconciliation.	2.00	
	JSC	Prepare summary of missing payments from general ledger and wire histories from CloudNine.	2.00	
	TFC	Discussion with Josh Cann regarding premium payment reconciliation and payment categories.	0.30	
07/15/2024	JSC	Review payor categories for relevance in insurance premium reconciliation.	4.00	
	JSC	Review payor categories for relevance in insurance premium reconciliation.	1.50	
	JSC	Prepare summary of missing payments from the general ledger and wire histories from CloudNine.	2.50	
	TFC	Review the updated life insurance premium payment reconciliation.	0.70	
07/16/2024	JSC	Review payor categories for relevance in insurance premium reconciliation.	3.00	
	JSC	Review of Provident Group payments for relevance in premium reconciliation.	1.00	
	JSC	Review of Provident Group payments for relevance in premium reconciliation.	2.20	
	JSC	Meeting with Taylor Caruso regarding status of premium reconciliation and Provident Group investigation.	0.80	n/c
	JSC	Review of missing insurance premium payments for relevance in premium reconciliation.	1.30	
	TFC	Meeting with Josh Cann regarding status of premium reconciliation and Provident Group investigation.	0.80	
07/17/2024	JSC	Review of missing insurance premium payments for relevance in premium reconciliation.	1.00	
	JSC	Review of missing insurance premium payments for relevance in premium reconciliation.	2.40	
	JSC	Prepare presentational summary of premium payment history.	1.00	
	JSC	Discussions with Taylor Caruso regarding summary of premium payments.	0.30	
	JSC	Review of missing insurance premium payments for relevance in premium reconciliation.	3.10	
	TFC	Discussions with Josh Cann regarding the premium reconciliation process.	0.20	
	TFC	Meeting with Josh Cann regarding the life insurance premium payment reconciliation and summary presentation.	0.30	
	TFC	Prepare an updated life insurance premium payment summary.	0.70	
	TFC	Review the updated life insurance premium payment summary.	0.30	
	TFC	Emails to Max Sawyer and Dan Stermer regarding a list of custodians for the initial		

			HOURS
		disclosures.	0.30
07/18/2024	JSC	Discussions with Taylor Caruso regarding summary of premium payments.	0.40
	JSC	Review of missing insurance premium payments for relevance in premium reconciliation.	2.00
	JSC	Prepare presentational summary of premium payment history.	1.10
	JSC	Discussion with Taylor Caruso regarding investigation of matured policies.	0.20
	JSC	Review of missing insurance premium payments for relevance in premium reconciliation.	0.50
	JSC	Review of matured policies in CloudNine.	2.30
	JSC	Meeting with Pat O'Malley and Taylor Caruso regarding the summary of reconciled premium payments and investigation into matured policies.	0.50
	JSC	Review of matured policy information in CloudNine.	1.00
	TFC	Discussions with Josh Cann regarding summary of premium payments.	0.40
	TFC	Discussion with Josh Cann regarding investigation of matured policies.	0.20
	TFC	Meeting with Pat O'Malley and Josh Cann regarding the summary of reconciled premium payments and investigation into matured policies.	0.50
	TFC	Review the life insurance policy premium payment reconciliation.	0.60
	TFC	Email to Dan Stermer and Class Counsel regarding the life insurance policy premium payment reconciliation.	1.10
	PJO	Meeting with T. Caruso and J. Cann regarding analysis of life insurance policies.	0.50
07/19/2024	JSC	Prepare summary of mature policy information.	3.00
	JSC	Prepare summary of sold policy information.	2.00
	JSC	Meeting with Taylor Caruso regarding the status of policy result investigation and formatting of information.	0.80
	JSC	Prepare summary of sold policy information.	2.20
	TFC	Meeting with Josh Cann regarding the status of policy result investigation and formatting of information.	0.80
	TFC	Email to Brett Von Borke regarding the life insurance premium payment reconciliation.	0.20
07/22/2024	JSC	Prepare summary of sold policy premium payments and receipts (AM).	4.00
	JSC	Prepare summary of sold policy premium payments and receipts (PM).	4.00
07/23/2024	JSC	Prepare summary of sold policy premium payments and receipts (AM).	3.70
	JSC	Prepare summary of sold policy premium payments and receipts (PM).	4.30



			HOURS
07/24/2024	JSC	Prepare summary of sold policy premium payments and receipts (AM).	4.00
	JSC	Prepare summary of sold policy premium payments and receipts (PM).	4.00
	JSC	Discussion with Taylor Caruso regarding sold policy sale proceeds.	0.20
	TFC	Discussion with Josh Cann regarding sold policy sale proceeds.	0.20
07/25/2024	JSC	Meeting with Taylor Caruso regarding summary of policy sale proceeds.	1.50
	JSC	Prepare summary of sold policy premium payments and receipts (AM).	2.00
	JSC	Prepare summary of sold policy premium payments and receipts (PM).	2.50
	TFC	Meeting with Josh Cann regarding summary of policy sale proceeds.	1.50
	TFC	Emails to Kerry Burns regarding communications with PHL Variable life insurance and follow-ups on their subpoena.	0.50
	TFC	Review change of beneficiary documents for a prior life insurance policy.	0.30
07/26/2024	JSC	Prepare summary of sold policy premium payments and receipts (AM).	4.00
	JSC	Prepare summary of sold policy premium payments and receipts (PM).	1.50
	JSC	Telephone call with Taylor Caruso regarding summary of sold policies and bulk policy purchases.	0.60
	JSC	Update presentation sheet to include policy profitability from reconciliation sheet.	0.20
	JSC	Review of policy acquisition documents in CloudNine for bulk purchases.	1.70
	TFC	Telephone call with Josh Cann regarding summary of sold policies and bulk policy purchases.	0.60
07/29/2024	JSC	Review of missing acquisition costs and dates for bulk policies in CloudNine.	3.50
	JSC	Discussion with Taylor Caruso regarding bulk purchase acquisition investigation.	0.20
	JSC	Review of missing acquisition costs and dates for bulk policies in CloudNine.	1.00
	TFC	Discussion with Josh Cann regarding bulk purchase acquisition investigation.	0.20
07/31/2024	TFC	Review ownership history for one of the life insurance policies.	0.30
08/06/2024	JSC	Review missing premium payments for relevance in reconciliation process.	1.50
		Forensic Acct Sources and Uses	1016.10
			<hr/> 284,583.00
05/15/2023	GB	Prepare monitorship check register for the week	

			HOURS	
		of 5/12/23.	0.40	
	GB	Process payment to Mitech One.	0.10	
	TFC	Review the updated receivership cash transaction database.	0.20	
05/16/2023	GB	Process payroll for 5/19/23.	0.20	
05/24/2023	AAV	Participate in Teams call with Taylor Caruso, Gabria Brenner, Daniel Stermer, and Pat O'Malley (partial), and with Brian Rich and Gavin Gaukroger regarding status of claims related issues, status of potential recovery related issues, and related issues.	0.90	n/c
	GB	Prepare monitorship check register for the week of 5/19/23.	0.40	
	GB	Participate in Teams call with Taylor Caruso, Dan Stermer, Alex Vazquez, and Pat O'Malley (partial), and with Brian Rich and Gavin Gaukroger regarding status of claims related issues, status of potential recovery related issues, and related issues.	0.90	
	PJO	Participate in Teams call with T. Caruso, G. Brenner, A. Vazquez, D. Stermer, and B. Rich and G. Gaukroger regarding status of claims-related issues, status of potential recovery-related issues, and related issues (O'Malley attended portion of longer call).	0.50	
	PJO	Follow-up Teams call with D. Stermer regarding status and potential recovery-related issues and the next steps.	0.10	
	TFC	Participate in Teams call with Dan Stermer, Gabria Brenner, Alex Vazquez, and Pat O'Malley (partial), and Brian Rich and Gavin Gaukroger regarding status of claims related issues, status of potential recovery related issues, and related issues.	0.90	
	TFC	Review the updated receivership cash transaction database.	0.20	
05/25/2023	TFC	Telephone calls with Jennifer Jimenez regarding document requests for a workers' compensation audit.	0.20	
	TFC	Email to Ruben Fernandez and Jules Carbone regarding a request for payroll records.	0.20	
	TFC	Email to Dan Stermer regarding the Quarterly payroll tax returns provided by Ruben Fernandez.	0.30	
	TFC	Review the quarterly payroll tax returns provided by Ruben Fernandez.	0.50	
05/26/2023	GB	Prepare monitorship check register for week of 5/19/23.	0.20	
	TFC	Participate in Teams call with Dan Stermer regarding payroll related/audit related issues and the next steps regarding same.	0.20	

			HOURS
05/30/2023	GB	Prepare the monitorship check register for the week of 5/26/23.	0.40
	GB	Process payroll for 5/19/23.	0.20
05/31/2023	TFC	Review the updated receivership cash transaction database and cash flow summary.	0.20
06/02/2023	TFC	Emails to Jules Carbone regarding the quarterly payroll tax forms.	0.20
06/05/2023	TFC	Participate in Teams call with Dan Stermer and Jules Carbone regarding staffing and workers' compensation audit and related issues.	0.30
	TFC	Telephone call with Great Harbor Insurance regarding the workers compensation audit.	0.30
	TFC	Review the updated receivership cash transaction database.	0.20
	TFC	Email to Gabria Brenner regarding updates to the receivership cash transaction database.	0.10
	GB	Prepare monitorship check register for the week of 6/2/23.	0.40
	GB	Process payment to GRM Information Management.	0.10
06/06/2023	TFC	Telephone call with AmTrust regarding the non-cooperative audit fees.	0.20
	TFC	Prepare and submit the workers' compensation audit to AmTrust.	0.60
	TFC	Emails to Dan Stermer regarding the workers' compensation audit and the non-cooperative audit fee.	0.30
	GB	Process payment to AmTrust Financial.	0.20
06/07/2023	TFC	Emails to Dan Stermer regarding the workers compensation audit and the non-cooperative audit fee.	0.30
	GB	Telephone call with AmTrust Financial regarding premium payment refund.	0.30
06/13/2023	GB	Prepare monitorship check register for week of 6/9/23.	0.30
	GB	Process payroll for 6/16/23.	0.20
06/15/2023	TFC	Review the updated receivership cash transaction database.	0.20
06/16/2023	GB	Process payment to Mitech One.	0.20
06/19/2023	GB	Prepare monitorship check register for week of 6/16/23.	0.40
06/20/2023	GB	Participate in Teams call with Taylor Caruso, Dan Stermer and Brian Rich, Michael Niles, and Gavin Gaukroger regarding claims related issues/status, potential investigation/litigation related issues and the next steps, and upcoming receiver's	

			HOURS	
		report.	0.50	
TFC		Participate in Teams call with Dan Stermer and Gabria Brenner and Brian Rich, Michael Niles, and Gavin Gaukroger regarding claims-related issues/status, potential investigation/litigation-related issues and next steps, and upcoming receiver's report.	0.50	
TFC		Review the updated receivership cash transaction database and monthly summary of results.	0.30	
06/21/2023	GB	Transfer funding to the prepaid commerce bank card.	0.50	
06/26/2023	GB	Prepare monitorship check register for the week of 6/23/23.	0.60	
	TFC	Review the updated receivership cash transaction database.	0.20	
06/27/2023	GB	Process payroll for 6/30/23.	0.20	
07/03/2023	GB	Prepare monitorship check register for week of 6/30/23.	0.30	
07/05/2023	TFC	Review the updated receivership cash flow summary.	0.20	
	DJY	Review the invoice from GRM Document Management and arrange payment.	0.30	n/c
07/06/2023	GB	Process payment to GRM Information Management.	0.10	
07/10/2023	GB	Prepare monitorship check register for week of 7/7/23.	0.40	
07/11/2023	GB	Process payroll for 7/14/23.	0.20	
07/17/2023	GB	Prepare monitorship check register for the week of 7/14/23.	0.50	
07/18/2023	AAV	Participate in Teams call with Pat O'Malley, Taylor Caruso, Gabria Brenner, Daniel Stermer, Brian Rich, Gavin Gaukroger, and Michael Niles regarding recovery related issues/status and next steps, litigation status/issues and next steps, and claims related issues and the next steps.	0.50	n/c
	GB	Process payment to Mitech One.	0.10	
	GB	Participate in Teams call with Pat O'Malley, Taylor Caruso, Dan Stermer, Alex Vazquez, Brian Rich, Gavin Gaukroger, and Michael Niles regarding recovery related issues/status and the next steps, litigation status/issues and the next steps, and claims related issues and next steps.	0.50	
	TFC	Participate in Teams call with Pat O'Malley, Dan Stermer, Gabria Brenner and Alex Vazquez		

			HOURS
		and Brian Rich, Gavin Gaukroger, and Michael Niles regarding recovery related issues/status and next steps, litigation status/issues and next steps, and claims related issues and next steps.	0.50
PJO		Video call with D. Stermer, T. Caruso, G. Brenner, A. Vazquez and B. Rich, G. Gaukroger, and M. Niles regarding recovery related issues/status and next steps, litigation status/issues and next steps, and claims related issues and next steps.	0.50
07/20/2023	TFC	Review the updated receivership cash transaction database.	0.20
07/25/2023	GB	Process payroll for 7/21/23.	0.10
07/31/2023	GB	Prepare monitorship check register for the week of 7/28/23.	0.60
	TFC	Review the updated receivership cash transaction database.	0.20
08/03/2023	GB	Process payment to GRM Information Management.	0.10
08/07/2023	GB	Prepare monitorship check register for week of 8/4/23.	0.40
08/08/2023	GB	Process payroll for 7/21/23.	0.10
08/09/2023	TFC	Review the updated receivership cash flow summary.	0.20
08/14/2023	GB	Prepare monitorship check register for the week of 8/11/23.	0.40
	TFC	Review the updated receivership cash flow summary.	0.20
08/18/2023	GB	Process payment to Mitech One.	0.10
08/21/2023	GB	Prepare monitorship check register for week of 8/18/23.	0.30
08/22/2023	TFC	Review the updated monthly cash flow summary.	0.20
08/23/2023	GB	Process payroll for 8-25-23.	0.20
08/29/2023	GB	Prepare monitorship check register for the week of 8/25/23.	0.70
09/05/2023	GB	Prepare monitorship check register for the week of 9/1/23.	1.00
	GB	Process payroll for 9/8/23.	0.10
	TFC	Review the updated monthly cash flow summary.	0.20
09/08/2023	GB	Process payment to GRM Information Management.	0.10

			HOURS	
09/11/2023	GB	Prepare monitorship check register for the week of 9/8/23.	0.40	
09/13/2023	TFC	Review the updated monthly cash flow summary.	0.20	
09/19/2023	GB	Process payment to Mitech One.	0.10	
	GB	Process payroll for 9-/22/23.	0.10	
	GB	Prepare monitorship check register for the week of 9/15/23.	0.40	
	GB	Participate in Teams call with Pat O'Malley, Taylor Caruso, Dan Stermer, and Brian Rich and Michael Niles regarding matter status, next steps, claims related issues, recovery related issues, and fee related issues.	0.50	
	TFC	Participate in Teams call with Pat O'Malley, Dan Stermer, and Gabria Brenner and Brian Rich and Michael Niles regarding matter status, next steps, claims related issues, recovery related issues, and fee related issues.	0.50	
	PJO	Video call with Dan Stermer, Taylor Caruso, Gabria Brenner, Brian Rich and Michael Niles regarding matter status, next steps, claims related issues, recovery related issues, and fee related issues.	0.50	
09/20/2023	TFC	Review the updated monthly cash flow summary.	0.20	
09/26/2023	GB	Prepare monitorship check register for the week of 9/22/23.	0.70	
	TFC	Review the updated monthly cash flow summary.	0.20	
10/03/2023	TFC	Prepare wire payment to Xponent HR solutions.	0.20	
	TFC	Emails to Ruben Fernandez and Jennifer Jimenez regarding payments for payroll and payroll taxes.	0.20	
	DJY	Review invoice from GRM Document Storage.	0.10	n/c
10/09/2023	GB	Prepare monitorship check register for the week of 10/6/23.	0.80	
	GB	Process payment to GRM Information Management.	0.10	
10/10/2023	GB	Participate in Teams call with Pat O'Malley, Taylor Caruso, Dan Stermer and Brian Rich, Gavin Gaukroger, and William Diab regarding status of various investigations and research and the next steps regarding same, expansion related issues, and next steps related issues.	0.70	
	TFC	Participate in Teams call with Pat O'Malley, Dan Stermer, and Gabria Brenner and Brian Rich, Gavin Gaukroger, and William Diab regarding status of various investigations and research and next steps regarding same, expansion-related issues, and next steps-related issues.	0.70	
	TFC	Review the updated receivership monthly cash flow summary.	0.20	

			HOURS
	PJO	Video call with Dan Stermer, Taylor Caruso, and Gabria Brenner and Brian Rich, Gavin Gaukroger, and William Diab regarding status of various investigations and research and next steps regarding same, expansion related issues, and next steps related issues. (O'Malley attended portion of longer call).	0.50
10/16/2023	GB	Prepare monitorship check register for the week of 10/13/23.	0.30
	GB	Process payment to GRM Information Management.	0.10
10/17/2023	GB	Process payroll for 10/20/23.	0.20
	TFC	Review the monthly cash flow summary.	0.20
10/19/2023	GB	Review commission schedule.	0.40
	MN	Prepare post-monitor commissions received schedule (AM).	2.70
	MN	Prepare post-monitor commissions received schedule (PM).	4.20
	TFC	Email to Gabria Brenner regarding the producer statements received from various insurance carriers.	0.10
	TFC	Email to McKenna Novack regarding an updated summary of the producer statements received from various insurance carriers.	0.30
10/20/2023	MN	Prepare post-monitor commissions received schedule (AM).	2.90
	MN	Prepare post-monitor commissions received schedule (PM).	0.80
10/23/2023	MN	Prepare post-monitor commissions received schedule (AM).	2.80
	MN	Prepare post-monitor commissions received schedule (PM).	1.80
10/24/2023	GB	Participate in Teams call with Pat O'Malley (partial), Taylor Caruso, Dan Stermer, Brian Rich, Michael Niles, William Diab, and Gavin Gaukroger regarding recovery related issues/investigations and the next steps and issues related to same	1.00
	MN	Prepare post-monitor commissions received schedule (AM).	1.20
	MN	Prepare post-monitor commissions received schedule (PM).	1.80
	TFC	Participate in Teams call with Pat O'Malley (partial), Dan Stermer, and Gabria Brenner and Brian Rich, Michael Niles, William Diab, and Gavin Gaukroger regarding recovery related issues/investigations and next steps and issues related to same.	1.00
	PJO	Video call with D. Stermer, T. Caruso, G. Brenner and Brian Rich, Michael Niles, William Diab, and Gavin Gaukroger regarding recovery	

			HOURS	
		related issues/investigations and next steps and issues related to same (P. O'Malley attended portion of longer call).	0.50	
10/25/2023	MN	Prepare post-monitor commissions received schedule.	2.80	
	MN	Meeting with Taylor Caruso regarding a post-monitor insurance commissions summary.	0.30	
	TFC	Meeting with McKenna Novack regarding a post-monitorship insurance commissions summary.	0.30	
10/26/2023	GB	Prepare monitorship check register for the week of 10/20/23.	0.50	
	TFC	Review the updated monthly cash flow summary.	0.20	
10/30/2023	GB	Prepare monitorship check register for the week of 10/27/23.	0.30	
	GB	Transfer funds to NSI prepaid debit card.	0.10	
10/31/2023	GB	Transfer funds to the NSI prepaid debit card.	0.60	
	GB	Process payroll for 11/3/23.	0.10	
	TFC	Participate in Teams call with Dan Stermer regarding Brandon Hall/Midland communication and issues relative to same.	0.20	
	TFC	Review the updated monthly cash flow summary.	0.20	
11/02/2023	DJY	Review the GRM Document Management invoice for November.	0.10	n/c
	GB	Process payment to GRM Information Management.	0.10	
11/06/2023	TFC	Review the updated receivership cash flow summary.	0.30	
	TFC	Email to Gabria Brenner regarding updated receivership cash flow summary and payments for professional fees.	0.20	
	GB	Prepare monitorship check register for the week of 11/3/23.	1.40	
	GB	Prepare analysis of investments by advisor and year of origination.	1.30	
11/07/2023	GB	Prepare updated master bank transaction database.	1.90	
11/08/2023	TFC	Meeting with McKenna Novack regarding the Shutts & Bowen invoice schedule.	0.20	
	TFC	Email to McKenna Novack regarding a summary of the Shutts & Bowen invoices.	0.40	
	GB	Participate in Teams call with Brian Rich, Taylor Caruso, and Dan Stermer regarding claims review/reconciliation and next steps regarding same and potential filing(s) related to same	1.20	
	PJO	Video call with D. Stermer, T. Caruso, G. Brenner, B. Rich, G. Gaukroger, and M. Niles (partial) regarding recovery related issues/status, claims related issues/status, and overall receivership related issues and		



			HOURS	
		next steps (O'Malley attended portion of longer call).	0.30	
11/09/2023	GB	Prepare an updated master bank transaction database.	0.80	
	GB	Prepare monitorship check register for the week of 11/3/23.	0.20	
11/10/2023	GB	Prepare an updated master bank transaction database.	1.20	
11/13/2023	GB	Prepare the monitorship check register for the week of 11/10/23.	0.60	
11/14/2023	GB	Process payroll for 11/3/23.	0.10	
11/20/2023	GB	Prepare monitorship check register for the week of 11/17/23.	0.30	
11/21/2023	TFC	Review the updated monthly cash flow summary.	0.20	
11/22/2023	TFC	Review the work-in-process chart prepared by Brian Rich.	0.60	
	TFC	Email to Brian Rich regarding the work-in-process chart and the latest insurance carrier subpoena tracker.	0.30	
11/27/2023	GB	Process payroll for 12/1/23.	0.20	
	GB	Prepare an updated receiver report for the week of 11/18/23.	0.50	
11/30/2023	TFC	Email to Gabria Brenner regarding a summary of the CloudNine meta data export.	0.30	
12/04/2023	DJY	E-mail to Dan Stermer and Gabria Brenner regarding the invoice from GRM Document Storage.	0.10	n/c
	GB	Prepare monitorship check register for the week of 12/1/23.	0.70	
	GB	Process payment to GRM Information Management.	0.10	
12/05/2023	TFC	Email to Dan Stermer regarding receivership entities.	0.10	
12/06/2023	DJY	E-mails with Dan Stermer and Taylor Caruso regarding the invoice from Carousel Checks for the purchase of new check stock.	0.20	n/c
	DJY	Telephone call with Carousel Checks regarding the invoice received for new check stock.	0.30	n/c
	GB	Prepare analysis of CloudNine metadata.	1.90	
12/11/2023	TFC	Review the updated monthly receivership cash flow summary.	0.20	
	GB	Prepare monitorship check register for week of 12/8/23.	0.60	

			HOURS
12/12/2023	GB	Process payroll for 12-15-23.	0.10
12/13/2023	GB	Prepare analysis of CloudNine metadata.	0.30
12/18/2023	GB	Prepare monitorship check register for the week of 12/15/23.	0.50
	GB	Process payment to Mitech One.	0.20
12/19/2023	PJO	Video call with D. Stermer, T. Caruso, G. Brenner and B. Rich, G. Gaukroger, M. Niles, and W. Diab regarding status of recovery efforts/demand/litigation, obtaining documents from third parties, and next steps regarding same.	0.60
	GB	Video call with Pat O'Malley, Taylor Caruso, and Dan Stermer and Brian Rich, Gavin Gaukroger, Michael Niles, and William Diab regarding status of recovery efforts/demand/litigation, obtaining documents from third parties, and next steps regarding same.	0.60
	TFC	Video call with Pat O'Malley, Dan Stermer, and Gabria Brenner and Brian Rich, Gavin Gaukroger, Michael Niles, and William Diab regarding status of recovery efforts/demand/litigation, obtaining documents from third parties, and next steps regarding same.	0.60
	TFC	Review the updated receivership monthly cash flow summary.	0.20
12/28/2023	GB	Prepare monitorship check register for the week of 12/22/23.	0.60
	GB	Process payroll for 12/29/23.	0.20
	TFC	Review the updated monthly receivership cash flow summary.	0.20
01/02/2024	GB	Prepare monitorship check register for the week of 12/29/23.	0.50
	GB	Video call with Pat O'Malley, Taylor Caruso, Dan Stermer and Brian Rich, Gavin Gaukroger, and Michael Niles regarding recovery efforts and next steps regarding same, litigation status and next steps, and discussions with Carl Schoeppl/Scott Orth regarding Grace Holdings and related issues.	0.80
	TFC	Video call with Pat O'Malley, Dan Stermer, and Gabria Brenner and Brian Rich, Gavin Gaukroger, and Michael Niles regarding recovery efforts and next steps regarding same, litigation status and next steps, and discussions with Carl Schoeppl/Scott Orth regarding Grace Holdings and related issues.	0.80
	PJO	Video call with Dan Stermer, Taylor Caruso, and Gabria Brenner and Brian Rich, Gavin Gaukroger, and Michael Niles regarding recovery efforts and next steps regarding same, litigation	

			HOURS
		status and next steps, and discussions with Carl Schoeppel/Scott Orth regarding Grace Holdings and related issues.	0.80
01/03/2024	TFC	Review the updated monthly receivership cash flow summary.	0.20
01/08/2024	GB	Prepare monitorship check register for the week of 1/5/24.	0.50
	GB	Process payroll for 1/12/24.	0.20
	TFC	Review the updated receivership monthly cash flow summary.	0.20
01/10/2024	GB	Prepare analysis on payroll register from 2023 to 2022.	0.70
01/11/2024	GB	Process payment to GRM Information Management.	0.10
01/12/2024	GB	Review change in insurance commissions from 2022 to 2023.	0.40
	GB	Prepare monitorship check register for the week of 1/5/24.	0.40
01/15/2024	GB	Process payment to Mitech One LLC.	0.10
01/16/2024	GB	Prepare monitorship check register for week of 1/12/24.	0.50
	GB	Video call with Taylor Caruso, Dan Stermer, and Brian Rich, Gavin Gaukroger, Michael Niles, and William Diab regarding recovery actions and status/mediation related issues, ongoing recovery investigations and potential next steps, and overall matter related issues.	0.70
	TFC	Video call with Dan Stermer and Gabriela Brenner and Brian Rich, Gavin Gaukroger, Michael Niles, and William Diab regarding recovery actions and status/mediation related issues, ongoing recovery investigations and potential next steps, and overall matter related issues.	0.70
	TFC	Email to William Diab regarding naming conventions for the Para Longevity entities.	0.10
01/17/2024	TFC	Review the updated Receivership monthly cash flow summary.	0.20
01/23/2024	TFC	Review the updated receivership monthly cash flow summary.	0.20
	GB	Process payroll for 1/26/24.	0.30
	GB	Prepare monitorship check register for the week of 1/19/24.	0.20
01/25/2024	TFC	Email to Kerry Burns regarding a form W-9.	0.10
01/26/2024	TFC	Prepare a 1099 import template.	0.20
01/31/2024	GB	Prepare reconciliation of outstanding balance	

			HOURS	
		and payments to MCM 301 Yamato LLC.	1.00	
02/01/2024	GB	Prepare monitorship check register for week of 1/26/24.	0.30	
	GB	Process payment to AMTrust.	0.20	
02/02/2024	GB	Process payment to GRM.	0.10	
	DJY	E-mail to Dan Stermer and Gabria Brenner regarding the GRM Document Storage invoice to be paid.	0.10	n/c
02/05/2024	GB	Prepare monitorship check register for the week of 2/2/24.	0.50	
02/06/2024	GB	Prepare monitorship check register for the week of 2/2/24.	0.60	
	GB	Process payroll for 2/9/24.	0.20	
	GB	Discussions with Taylor Caruso regarding payment of operating expenses.	0.10	
	TFC	Discussions with Gabria Brenner regarding payment of operating expenses.	0.10	
02/13/2024	GB	Prepare monitorship check register for the week of 2/9/24.	0.60	
	GB	Prepare payroll reconciliation for Alphstaff registers.	1.40	
	GB	Video call with Pat O'Malley, Taylor Caruso, Dan Stermer, Brian Rich, William Diab, and Michael Niles regarding matter status, recovery issues/status, litigation status, ongoing investigation status, and potential next steps.	0.80	
	TFC	Video call with Pat O'Malley, Dan Stermer, Gabria Brenner, Brian Rich, William Diab, and Michael Niles regarding matter status, recovery issues/status, litigation status, ongoing investigation status, and potential next steps.	0.80	
	PJO	Video call with D. Stermer, T. Caruso, G. Brenner, B. Rich, W. Diab, and M. Niles regarding matter status, recovery issues/status, litigation status, ongoing investigation status, and potential next steps.	0.80	
02/14/2024	GB	Video call with Pat O'Malley, Taylor Caruso, Dan Stermer, Brian Rich, Michael Niles, and William Diab regarding ongoing compensation investigations/review and review documents related to same.	0.70	
	GB	Process payment to MCM 301 Yamato.	0.10	
	TFC	Video call with Pat O'Malley, Dan Stermer, Gabria Brenner, Brian Rich, Michael Niles, and William Diab regarding ongoing compensation investigations/review and review documents related to same.	0.70	
	PJO	Video call with D. Stermer, T. Caruso, G. Brenner, B. Rich, M. Niles, and W. Diab		

			HOURS	
		regarding ongoing compensation investigations/review and review documents related to same.	0.70	
02/15/2024	TFC	Review the updated monthly receivership cash flow summary.	0.20	
02/16/2024	GB	Process payment to Mitech One.	0.10	
02/21/2024	TFC	Review the updated monthly cash flow summary.	0.20	
	TFC	Email to Gabria Brenner regarding the monthly cash flow summary.	0.10	
	GB	Process payroll for 2/9/24.	0.10	
	GB	Prepare monitorship check register for week of 2/16/24.	0.70	
02/22/2024	TFC	Review the updated monthly cash flow summary.	0.10	
02/23/2024	TFC	Email to Dan Stermer regarding prior 401(k) audit and loss of earnings.	0.30	
02/26/2024	TFC	Review the updated monthly cash flow budget.	0.20	
	GB	Prepare monitorship check register for week of 2/23/24.	0.60	
02/27/2024	TFC	Video call with Pat O'Malley, Dan Stermer, Brian Rich, William Diab and Michael Niles regarding upcoming mediations and issues relative to same, additional recovery related issues, and litigation related issues and potential next steps.	1.00	
	TFC	Email to Brian Rich regarding an updated master work-in-process chart.	0.10	
	PJO	Video call with Daniel Stermer, Taylor Caruso, Brian Rich, William Diab and Michael Niles regarding upcoming mediations and issues relative to same, additional recovery related issues, and litigation related issues and potential next steps.	1.00	
03/04/2024	GB	Prepare monitorship check register for the week of 3/1/24.	0.70	
	DJY	Review e-mail from GRM Document Storage regarding the February 2024 storage invoice.	0.10	n/c
03/05/2024	GB	Process payroll for 3/8/24.	0.10	
03/07/2024	TFC	Review the monthly cash flow summary.	0.20	
03/08/2024	TFC	Video call with Pat O'Malley, Dan Stermer, and Gabria Brenner and Michael Niles, William Diab, and Gavin Gaukroger regarding upcoming AlphaStaff subpoena-related issues, upcoming mediations, and ongoing recovery investigations and potential next steps regarding same.	0.70	
	GB	Video call with Pat O'Malley, Taylor Caruso,		

			HOURS
		Dan Stermer and Michael Niles, William Diab, and Gavin Gaukroger regarding upcoming AlphaStaff subpoena related issues, upcoming mediations, and ongoing recovery investigations and potential next steps regarding same.	0.70
PJO		Video call with Dan Stermer, Taylor Caruso, and Gabria Brenner and Michael Niles, William Diab, and Gavin Gaukroger regarding upcoming AlphaStaff subpoena related issues, upcoming mediations, and ongoing recovery investigations and potential next steps regarding same	0.70
03/11/2024	TFC	Review the updated monthly cash flows.	0.10
	GB	Prepare monitorship check register for the week of 3/8/24.	0.40
03/15/2024	GB	Process payment to Mitech One.	0.10
03/18/2024	GB	Process payroll for 3/8/24.	0.10
03/19/2024	TFC	Email to Ruben Fernandez regarding future email communications for payroll taxes.	0.10
	TFC	Email to Dan Stermer regarding process to coordinate future payments for operating expenses.	0.20
	GB	Prepare the monitorship check register for the week of 3/15/24.	0.10
03/20/2024	TFC	Review the updated monthly cash flow summary.	0.20
03/25/2024	JO	Prepared the monthly cash flow for the week ending 3/22/24.	1.30
03/26/2024	TFC	Telephone call with E-Forensics regarding their outstanding invoice.	0.10
	TFC	Review the updated monthly cash flow summary.	0.20
	TFC	Email to Jack O'Brien regarding the balance on the commerce bank prepaid card.	0.20
	JO	Work to fund prepaid Commerce Bank card.	0.80
	JO	Email to Daniel Stermer with monthly cash flow summary for the week ending 3/22/24.	0.10
03/29/2024	JO	Review and confirm transfer from First Horizon and to Commerce Bank.	0.40
04/01/2024	JO	Prepare monthly cash flow summary for the week ending 3/29/24.	1.30
	TFC	Review the monthly cash flow summary.	0.20
04/02/2024	JO	Email to Dan Stermer regarding monthly cash flow summary for the week ending 3/29/24.	0.10
	JO	Email to Jennifer Jimenez regarding payroll on 4/5/2024.	0.20
	JO	Process payment of payroll withholdings for 4/5/2024 payroll.	0.20
	TFC	Email to Jack O'Brien regarding payroll and	

			HOURS
		payroll tax payments.	0.10
04/03/2024	JO	Prepare and process payment for GRM invoice #0183575.	0.20
04/04/2024	JO	Download and retain bank statements from First Horizon from prior periods.	0.30
04/05/2024	JO	Review the First Horizon portal for the Katchis family settlement.	0.30
04/08/2024	JO	Review of banking portal to confirm deposit from the Katchis family settlement.	0.20
04/09/2024	JO	Video call with Pat O'Malley, Taylor Caruso, Daniel Stermer and Brian Rich, Gavin Gaukroger, Michael Niles, and William Diab regarding status of various investigations/drafting of complaints, administrative related issues, and the next steps.	0.50
	PJO	Video call with D. Stermer, T. Caruso, J. O'Brien and B. Rich, G. Gaukroger, M. Niles, and W. Diab regarding status of various investigations/drafting of complaints, administrative related issues, and the next steps.	0.50
	TFC	Video call with Pat O'Malley, Dan Stermer, Jack O'Brien and Brian Rich, Gavin Gaukroger, Michael Niles, and William Diab regarding status of various investigations/drafting of complaints, administrative-related issues, and the next steps.	0.50
04/10/2024	JO	Prepare cash flow summary for the week ending 4/5/2024.	1.20
	JO	Prepare the monthly cash flow report for the week ending 4/5/2024.	1.50
	TFC	Email to Elaine Paul regarding transition of payroll processing for Jennifer Jimenez.	0.20
	TFC	Review the monthly cash flow summary.	0.30
	TFC	Email to Jack O'Brien regarding the monthly cash flow summary.	0.10
04/11/2024	JO	Email to Daniel Stermer with monthly cash flow summary for the week ending 4/5/2024.	0.10
	TFC	Video call with Elaine Paul and Jules Carbone regarding transition of payroll for Jennifer Jimenez.	0.30
	TFC	Email to Jennifer Jimenez regarding payroll transition planning.	0.20
04/15/2024	TFC	Email to Jules Carbone regarding personal information for Jennifer Jimenez and the payroll transition.	0.10
04/17/2024	JO	Prepare weekly cash flow summary for the week	

			HOURS
		ending 4/12/2024; processed payments for payroll and invoice from Mitech.	1.20
	JO	Email to Daniel Stermer with monthly cash flow summary for the week ending 4/12/2024.	0.10
	TFC	Review the updated monthly cash flow summary.	0.20
04/22/2024	JO	Prepare monthly cash flow summary for the week ending 4/19/2024.	1.10
04/23/2024	TFC	Review the updated monthly cash flow summary.	0.20
	TFC	Email to Jack O'Brien regarding the updated monthly cash flow summary.	0.10
	TFC	Email to Daija Lifshitz regarding process to search for emails on CloudNine.	0.20
04/24/2024	JO	Email to Daniel Stermer with the monthly cashflow summary for the week ending 4/19/2024.	0.20
04/29/2024	TFC	Email to Jules Carbone regarding the payroll transition for Jennifer Jimenez.	0.10
04/30/2024	JO	Prepare monthly cash flow summary for the week ending 4/24/2024.	0.70
	JO	Review and prepare wire transfer to Xponent HR; email to Jennifer Jimenez about same.	0.20
05/01/2024	TFC	Email to Brian Rich and Dan Stermer regarding payments to Jeff Baxter, Marshal Seeman, and Eric Holtz.	0.30
05/03/2024	TFC	Email to William Diab documentation regarding the Preferred Unit Purchase Agreements issued by Seeman Holtz Wealth Management.	0.40
	JO	Email to Daniel Stermer regarding the monthly cash flow summary for the week ending 4/26/2024.	0.10
05/06/2024	JO	Prepare the monthly cash flow summary for the week ending 5/3/2024	1.00
05/07/2024	JO	Email to Daniel Stermer with the monthly cash flow summary for the week ending 5/3/2024.	0.20
	JO	Email to Daniel Stermer and Taylor Caruso regarding updates to the monthly cash flow summary.	0.10
	TFC	Review the updated monthly cash flow summary.	0.20
	TFC	Email to Jack O'Brien regarding a settlement cash tracker.	0.10
05/10/2024	TFC	Email to Gavin Gaukroger regarding the invoice for Roy Kobert.	0.10
05/13/2024	JO	Prepare monthly cash flow summary for the week ending 5/10/2024.	2.30
	JO	Email to Daniel Stermer regarding the monthly cash flow summary for the week ending	



			HOURS
		5/10/2024.	0.10
	TFC	Prepare an updated settlement tracker.	0.30
	TFC	Email to Kerry Burns and Mike Niles regarding the approved settlements to-date.	0.20
	TFC	Email to Jack O'Brien regarding the updated monthly cash flow summary and settlement tracker.	0.10
	TFC	Review the updated monthly cash flow summary.	0.20
05/15/2024	JO	Phone call with Gray Robinson to confirm wire instructions for payment.	0.10
	TFC	Email to Dan Stermer regarding payment to Roy Kobert.	0.10
05/16/2024	JO	Process payments for Gray Robinson invoices related to mediations.	0.50
	JO	Process payments for Jennifer Jimenez invoices related to payroll.	0.20
	JO	Process payments for Mitech invoices related to services provided.	0.20
05/17/2024	JO	Process payments for Gray Robinson invoices related to mediations.	0.40
05/20/2024	JO	Prepare updates to the settlement summary per comments from Daniel Stermer.	1.00
05/30/2024	JO	Issue payment for Jennifer Jimenez payroll	0.30
05/31/2024	JO	Telephone call with Taylor Caruso regarding the monthly cash flow summary.	0.10
	JO	Prepare updates to the monthly cash flow summary for the week ending 5/31/24.	1.10
	TFC	Email to Dan Stermer regarding the updated monthly cash flow summary and settlement tracker.	0.10
	TFC	Review the updated monthly cash flow summary and settlement tracker.	0.30
06/04/2024	PJO	Video call with D. Stermer, T. Caruso, J. O'Brien, B. Rich, M. Niles, G. Gaukroger, W. Diab, and M. Sawyer regarding Wells Fargo related issues and potential experts, litigation strategy, and next steps.	0.50
	JO	Video call with Pat O'Malley and Taylor Caruso and Daniel Stermer and Brian Rich, Michael Niles, Gavin Gaukroger, William Diab, and Max Sawyer regarding Wells Fargo related issues and potential experts, litigation strategy, and next steps.	0.50
	TFC	Video call with Pat O'Malley and Dan Stermer and Jack O'Brien and Brian Rich, Michael Niles, Gavin Gaukroger, William Diab, and Max Sawyer regarding Wells Fargo related issues and potential experts, litigation strategy, and next steps.	0.50

			HOURS
06/06/2024	TFC	Prepare payment for operating expenses.	0.10
	TFC	Email to Dan Stermer regarding payment to AmTrust.	0.10
06/12/2024	TFC	Email to Jack O'Brien regarding payment for operating expenses.	0.10
	JO	Prepare monthly cash flow summary for the week ending 6/7/24; process payment for outstanding invoices.	0.80
06/13/2024	TFC	Email to Dan Stermer regarding notice from the PHL Variable Insurance Company.	0.20
	TFC	Review the updated Receivership monthly cash flow summary.	0.20
	TFC	Email to Jack O'Brien regarding the updated monthly cash flow summary.	0.10
06/14/2024	JO	Email to Daniel Stermer regarding the monthly cashflow summary for the week ending 6/7/24.	0.20
06/23/2024	JO	Email to Daniel Stermer regarding payments made in the week ending 6/21/24; process payments about same.	0.30
06/26/2024	JO	Prepare monthly cash flow summary and process payment for pending invoices.	0.90
06/27/2024	TFC	Review the updated monthly cash flow summary.	0.20
	TFC	Email to Jack O'Brien regarding the Visa prepaid debit card.	0.20
07/10/2024	JO	Review and process payment for Jennifer Jimenez payroll invoice.	0.20
07/11/2024	TFC	Telephone call with Brett Bon Borke, Gavin Gaukroger, William Diab, Gavin Gaukroger, Mike Niles, David Buckner, Scott Silver, and Jim Sallah regarding the Everlaw transition [TC Partial].	0.40
07/15/2024	JO	Prepare monthly cash flow summary for the period ending 7/12/24.	0.90
	JO	Phone call with GRM regarding updates to the access permissions; email about same.	0.40
	TFC	Review the updated cash flow summary.	0.20
07/16/2024	JO	Email to GRM regarding access request form; discussions with Taylor Caruso about same.	0.30
	JO	Email to Daniel Stermer regarding the monthly cashflow summary.	0.10
07/17/2024	JO	Email to GRM regarding access regarding the outstanding invoices.	0.20
	JO	Process payments for outstanding Mitech and GRM invoices.	0.30

			HOURS
07/22/2024	JO	Prepare monthly cash flow summary for the week ending 7/19/24.	0.90
	JO	Set up access to GRM management portal.	0.20
	TFC	Review the updated monthly cash flow summary.	0.20
07/23/2024	JO	Email to Dan Stermer regarding monthly cash flow summary.	0.10
07/25/2024	TFC	Email to Dan Stermer regarding payment for operating expenses.	0.10
07/26/2024	JO	Process payments for Jennifer Jimenez and CSC Global.	0.70
	JO	Transfer funds from First Horizon Bank to Commerce bank for payments.	0.10
07/31/2024	TFC	Email to Kerry Burns regarding payment for operating expense.	0.10
08/06/2024	PJO	Video call with T. Caruso, D. Stermer, B. Rich, G. Gaukroger, M. Niles, and M. Sawyer regarding litigation issues/strategy/next steps and mediation-related issues and the next steps.	0.60
	TFC	Video call with Taylor Caruso and Pat O'Malley and Brian Rich, Gavin Gaukroger, Michael Niles, and Max Sawyer regarding litigation issues/strategy/next steps and mediation related issues and next steps.	0.60
08/07/2024	TFC	Email to Kerry Burns regarding operating expense payments.	0.30
08/12/2024	JO	Process payment for July GRM invoice.	0.20
08/13/2024	TFC	Email to Marissa Fernandes of CSC regarding payment for operating expenses.	0.20
08/15/2024	JO	Email to Daniel Stermer regarding Fifth Avenue settlement deposit; verify bank details to confirm.	0.20
	JO	Email to Elain Paul regarding Jennifer Jimenez invoice.	0.10
08/16/2024	TFC	Review the updated monthly cash flows.	0.20
	JO	Prepare monthly cash flow forecast for the week ending 8/9/24; process pending payments.	1.50
	JO	Email to Daniel Stermer regarding monthly cashflow summary for the period ending 8/9/24.	0.20
08/20/2024	JO	Process payments for CSC and Gray Robinson for open invoices.	0.30
08/21/2024	TFC	Review the updated monthly cash flows.	0.10
	JO	Email to Marissa Fernandes regarding payment sent for CSC.	0.20

			HOURS
	JO	Prepare monthly cash flow summary for the period ending 8/16/2024; process pending payments.	1.50
	JO	Email to Daniel Stermer with the cash flow summary for the period ending 8/16/2024.	0.10
08/22/2024	TFC	Email to Marissa Fernandes regarding payment evidence for prior ACH transactions.	0.50
08/27/2024	TFC	Email to Marissa Fernandes regarding payment for operating expense.	0.10
09/03/2024	TFC	Email to Marissa Fernandes regarding payment for operating expense.	0.10
	TFC	Review the updated monthly cash flow summary.	0.20
	TFC	Email to Jack O'Brien regarding the updated monthly cash flow summary.	0.10
	JO	Email to Elaine Paul regarding payment for the 6/14/24 payroll invoice; review banking portal.	0.30
	JO	Prepare the monthly cashflow summary for the week ending 8/30/2024.	1.00
	JO	Telephone call with CSC Global support regarding application of submitted payments.	0.30
09/04/2024	JO	Email to Taylor Caruso regarding pending CSC invoices.	0.10
	JO	Phone call with CSC Global support regarding application of submitted payments.	0.30
	JO	Email to Elaine Paul regarding payment for the 9/6/24 payroll invoice; process payment within banking portal.	0.20
	JO	Email to Daniel Stermer regarding the monthly cashflow summary for the week ending 8/30/2024.	0.10
09/12/2024	TFC	Review the updated monthly cash flow summary.	0.20
	TFC	Email to Jack O'Brien regarding the updated monthly cash flow summary.	0.10
	JO	Prepare monthly cashflow summary for the week ending 9/6/2024.	1.10
	JO	Process payment for pending Gray Robinson invoice.	0.20
	JO	Email to Daniel Stermer regarding monthly cash flow summary for the week ending 9/6/24.	0.10
09/16/2024	JO	Prepare monthly cash flow summary for the week ending 9/13/2024; process received invoices.	0.90
	TFC	Review the updated monthly cash flow summary.	0.20
09/17/2024	JO	Telephone call with E-Forensics regarding open invoices.	0.20
09/18/2024	JO	Email to Daniel Stermer regarding E-Forensics invoices.	0.10
	JO	Process payment for Jennifer Jimenez payroll/invoice.	0.20

			HOURS	
09/23/2024	JO	Prepare monthly cash flow summary for the week ending 9/20/2024.	0.80	
09/30/2024	JO	Prepare monthly cash flow summary for the week ending 9/27/2024.	0.90	
		Business Analysis	156.70	54,065.00
05/15/2023	GB	Prepare reconciliation of noteholder's claims.	0.40	
05/24/2023	GB	Prepare reconciliation of noteholder's claims.	0.40	
	TFC	Review additional Midland account statements and allocation of interest payments to the various noteholders.	1.80	
	TFC	Email to Whitney Pope regarding missing Midland account statements.	0.40	
05/25/2023	TFC	Discussions with Alex Vazquez regarding allocation of the payments to Midland among the various noteholders and updates to the claims reconciliation.	0.40	
	AAV	Discussions with Taylor Caruso regarding allocation of the payments to Midland among the various noteholders and updates to the claims reconciliation.	0.40	n/c
05/26/2023	AAV	Prepare conversions of Midland's PDFs to Excel to support the claims reconciliation.	4.00	
05/31/2023	TFC	Email to Whitney Pope regarding the Midland account statements.	0.10	
	TFC	Prepare a reconciliation of wires to Midland split between the various noteholders.	0.20	
	AAV	Prepare the conversion of the Midland PDF account statements to Excel.	4.00	
	AAV	Prepare updates to the account statements as a part of the larger claims reconciliation process.	3.10	
06/01/2023	GB	Prepare reconciliation of noteholder's claims.	3.20	
	AAV	Sought out duplicate entries for the various noteholders and updates to claim reconciliation.	4.30	
06/02/2023	GB	Prepare reconciliation of noteholder's claims.	1.20	
	AAV	Reconcile payments from Midland between the various noteholders as part of the claims reconciliation process	4.00	
	AAV	Reconcile payments from Midland between the various noteholders as part of the claims reconciliation process	3.90	
06/05/2023	AAV	Reconcile payments from Midland between the various noteholders as part of the claims reconciliation process (A.M.).	2.80	
	AAV	Reconcile payments from Midland between the various noteholders as part of the claims		

			HOURS
		reconciliation process (P.M.).	2.80
	GB	Prepare reconciliation of noteholder's claims.	2.50
06/06/2023	AAV	Reconcile payments from Midland between the various noteholders as part of the claims reconciliation process (A.M.).	3.50
	AAV	Reconcile payments from Midland between the various noteholders as part of the claims reconciliation process (P.M.).	4.00
	GB	Prepare reconciliation of noteholder's claims.	2.40
06/07/2023	AAV	Prepare updates to the account statements as a part of the larger claims reconciliation process (A.M.).	4.20
	AAV	Prepare updates to the account statements as a part of the larger claims reconciliation process (P.M.).	3.50
	TFC	Email to Jennifer Jimenez regarding missing Midland account numbers for the claims reconciliation.	0.10
	TFC	Email to Whitney Pope regarding missing Midland account statements for the claims reconciliation process.	0.30
	GB	Reconcile Vantage payment details to claim register.	1.30
06/08/2023	AAV	Reconcile payments from Midland between the various noteholders as part of the claims reconciliation process (A.M.).	3.50
	AAV	Reconcile payments from Midland between the various noteholders as part of the claims reconciliation process (P.M.).	4.50
	TFC	Email to Jennifer Jimenez regarding missing Midland account numbers for the claims reconciliation.	0.10
	GB	Prepare reconciliation of noteholder's claims.	2.00
	GB	Continue to prepare reconciliation of noteholder's claims.	1.80
06/09/2023	AAV	Prepare updates to the account statements as a part of the larger claims reconciliation process (A.M.).	5.00
	AAV	Prepare updates to the account statements as a part of the larger claims reconciliation process (P.M.).	3.00
	GB	Prepare reconciliation of noteholder's claims.	2.90
	GB	Continue to prepare reconciliation of noteholder's claims.	2.70
06/12/2023	AAV	Reconcile payments from Midland between the various noteholders as part of the claims reconciliation process (A.M.).	2.00
	AAV	Reconcile payments from Midland between the various noteholders as part of the claims reconciliation process (P.M.).	3.50
	GB	Prepare reconciliation of noteholder's claims.	3.60

			HOURS
	GB	Continue to prepare reconciliation of noteholder's claims.	2.00
06/13/2023	AAV	Reconcile payments from Midland between the various noteholders as part of the claims reconciliation process.	3.50
	GB	Prepare reconciliation of noteholder's claims.	1.30
	TFC	Emails to Jennifer Jimenez regarding a list of the Midland account numbers for the noteholders.	0.20
06/14/2023	AAV	Reconcile payments from Midland between the various noteholders as part of the claims reconciliation process.	2.50
	AAV	Reconcile payments from Midland between the various noteholders as part of the claims reconciliation process.	2.00
	GB	Prepare reconciliation of noteholder's claims.	3.70
	GB	Continue to prepare reconciliation of noteholder's claims.	2.50
06/15/2023	AAV	Reconcile payments from Midland between the various noteholders as part of the claims reconciliation process.	3.00
	GB	Prepare reconciliation of noteholder's claims.	0.70
	TFC	Review the list of missing Midland account statements.	0.50
	TFC	Email to Whitney Pope regarding additional missing account statements from Midland.	0.20
06/19/2023	GB	Prepare reconciliation of noteholder's claims.	0.80
06/20/2023	GB	Prepare reconciliation of noteholder's claims.	0.80
	TFC	Participate in Teams call with Dan Stermer regarding claims review/reconciliation-related issues/status.	0.20
06/21/2023	GB	Prepare summary of claims process.	1.40
06/22/2023	GB	Prepare reconciliation of noteholder's claims.	0.60
	AAV	Reconcile payments from Midland between the various noteholders as part of the claims reconciliation process (AM).	3.50
	AAV	Reconcile payments from Midland between the various noteholders as part of the claims reconciliation process (PM).	2.00
06/23/2023	GB	Prepare reconciliation of noteholder's claims.	0.50
	AAV	Reconcile payments from Midland between the various noteholders as part of the claims reconciliation process (PM).	0.50
06/26/2023	GB	Prepare reconciliation of noteholder's claims.	1.00
	AAV	Reconcile payments from Midland between the various noteholders as part of the claims reconciliation process (A.M.).	2.50

			HOURS
	AAV	Reconcile payments from Midland between the various noteholders as part of the claims reconciliation process (P.M.).	2.90
06/27/2023	AAV	Reconcile payments from Midland between the various noteholders as part of the claims reconciliation process (A.M.).	3.00
	AAV	Reconcile payments from Midland between the various noteholders as part of the claims reconciliation process (P.M.).	1.90
	TFC	Review the updated noteholder interest reconciliation for payments to Midland.	0.50
	TFC	Email to Whitney Pope regarding missing account statements for noteholders.	0.20
06/29/2023	GB	Prepare reconciliation of noteholder's claims.	0.90
07/03/2023	AAV	Reconcile payments from Midland between the various noteholders as part of the claims reconciliation process (A.M.).	1.50
	AAV	Reconcile payments from Midland between the various noteholders as part of the claims reconciliation process (P.M.).	2.00
	GB	Prepare reconciliation of noteholder's claims.	0.20
07/05/2023	AAV	Reconcile payments from Midland between the various noteholders as part of the claims reconciliation process (A.M.).	2.90
	AAV	Reconcile payments from Midland between the various noteholders as part of the claims reconciliation process (P.M.).	2.50
	TFC	Review the updated noteholder interest reconciliation for payments to Midland.	0.50
	TFC	Email to Whitney Pope regarding missing account statements for noteholders.	0.20
07/06/2023	GB	Prepare reconciliation of noteholder's claims.	3.50
07/10/2023	AAV	Reconcile payments from Midland between the various noteholders as part of the claims reconciliation process (A.M.).	0.50
	AAV	Reconcile payments from Midland between the various noteholders as part of the claims reconciliation process (P.M.).	1.50
07/11/2023	GB	Review noteholder questions regarding receivership report.	1.80
	TFC	Email to Dan Stermer regarding questions from Noteholders.	0.20
07/12/2023	AAV	Reconcile payments from Midland between the various noteholders as part of the claims reconciliation process (A.M.).	2.90
	AAV	Reconcile payments from Midland between the various noteholders as part of the claims reconciliation process (P.M.).	2.00



			HOURS
07/13/2023	AAV	Reconcile payments from Midland between the various noteholders as part of the claims reconciliation process (P.M).	3.10
	TFC	Review the updated Midland noteholder interest payment reconciliation.	0.60
	TFC	Prepare an updated Midland noteholder interest payment reconciliation.	1.70
	TFC	Email to Whitney Pope regarding missing pdf account statements for noteholders.	0.20
07/14/2023	AAV	Reconcile payments from Midland between the various noteholders as part of the claims reconciliation process (P.M).	3.50
07/17/2023	AAV	Reconcile payments from Midland between the various noteholders as part of the claims reconciliation process (P.M).	3.50
	TFC	Email to Whitney Pope regarding the Midland PDF account statements for noteholders.	0.10
07/18/2023	AAV	Reconcile payments from Midland between the various noteholders as part of the claims reconciliation process (A.M).	1.50
	AAV	Reconciled payments from Midland between the various noteholders as part of the claims reconciliation process (P.M).	2.60
	TFC	Prepare an updated reconciliation of the Midland interest payment to noteholders.	1.60
	TFC	Review the updated reconciliation of the Midland interest payment to noteholders.	0.20
	TFC	Email to Gabria Brenner regarding updates to the master claims reconciliation considering noteholder interest payments from Midland.	0.20
07/19/2023	TFC	Email to Rowen Dizon regarding a reconciliation of additional Midland account numbers to the filed claims.	0.20
07/20/2023	RCD	Review and analyze the reconciliation of the Midland interest payments between claim numbers and Midland account numbers (740 through 800).	2.80
	RCD	Review and analyze the reconciliation of the Midland interest payments between claim numbers and Midland account numbers (801 through 880).	2.50
	GB	Prepare reconciliation of noteholders' claims.	1.50
	TFC	Email to Whitney Pope regarding the Midland PDF account statements for noteholders and reconciliation of interest payments to noteholders.	0.20
07/21/2023	GB	Prepare reconciliation of noteholders' claims.	3.00
	GB	Continue to prepare reconciliation of noteholders' claims.	3.80
07/24/2023	AAV	Review payments from Midland between the	

			HOURS
		various noteholders as part of the claims reconciliation process.	3.30
	GB	Prepare reconciliation of noteholder's claims.	2.00
07/25/2023	AAV	Review process for the filed claims (A.M).	1.00
	GB	Prepare reconciliation of noteholder's claims.	1.50
07/26/2023	AAV	Review process for the filed claims (A.M).	3.50
	GB	Prepare reconciliation of noteholder's claims.	1.60
	TFC	Email to Gabria Brenner regarding payments to National Financial Services LLC and how they were accounted for in the claims reconciliation.	0.20
07/28/2023	TFC	Review the updated claims analysis.	0.40
08/01/2023	AAV	Review payments from Midland between the various noteholders as part of the claims reconciliation process (A.M).	2.90
	AAV	Review payments from Midland between the various noteholders as part of the claims reconciliation process (P.M).	2.80
	GB	Prepare reconciliation of noteholder's claims.	2.10
08/02/2023	AAV	Review payments from Midland between the various noteholders as part of the claims reconciliation process (A.M).	3.00
	AAV	Review payments from Midland between the various noteholders as part of the claims reconciliation process (P.M).	2.00
	GB	Prepare reconciliation of noteholder's claims.	1.00
	GB	Participate in Teams call with Taylor Caruso and Dan Stermer regarding claims review/reconciliation and analysis related to same and the next steps.	0.60
	GB	Prepare detailed schedule of investor notes for the claims analysis.	3.10
	TFC	Participate in Teams call with Dan Stermer regarding claims review and analysis.	0.10
	TFC	Participate in Teams call with Dan Stermer and Gabria Brenner regarding claims review/reconciliation and analysis related to same and next steps.	0.60
08/03/2023	GB	Prepare detailed schedule of investor notes for the claims analysis.	2.80
	GB	Continue to prepare detailed schedule of investor notes for the claims analysis.	2.10
08/04/2023	AAV	Review payments from Midland between the various noteholders as part of the claims reconciliation process.	1.20
	GB	Prepare detailed schedule of investor notes for the claims analysis.	3.40
	GB	Continue to prepare detailed schedule of investor notes for claims analysis.	0.40

			HOURS
08/07/2023	AAV	Review payments from Midland between the various noteholders as part of the claims reconciliation process	1.50
	GB	Prepare reconciliation of noteholder's claims.	0.40
	GB	Prepare detailed schedule of investor notes for the claims analysis.	3.60
	GB	Continue to prepare detailed schedule of investor notes for the claims analysis.	1.00
08/08/2023	AAV	Teams messages with Gabria Brenner regarding interest rate percentages.	0.60
	GB	Prepare a detailed schedule of investor notes for the claims analysis.	2.40
	GB	Continue to prepare detailed schedule of investor notes for claims analysis.	1.20
08/09/2023	GB	Prepare detailed schedule of investor notes for the claims analysis.	3.10
	GB	Continue to prepare detailed schedule of investor notes for claims analysis.	1.50
08/10/2023	AAV	Review payments from Midland between the various noteholders as part of the claims reconciliation process	1.10
	GB	Prepare detailed schedule of investor notes for the claims analysis.	1.80
08/11/2023	GB	Prepare detailed schedule of investor notes for claims analysis.	2.10
08/14/2023	GB	Prepare detailed schedule of investor notes for the claims analysis.	3.00
	GB	Continue to prepare detailed schedule of investor notes for claims analysis.	1.60
08/15/2023	GB	Prepare detailed schedule of investor notes for the claims analysis.	1.90
08/16/2023	GB	Prepare detailed schedule of investor notes for the claims analysis.	1.90
08/17/2023	GB	Prepare detailed schedule of investor notes for claims analysis.	3.00
	GB	Prepare recalculation of interest on investor notes.	1.80
	TFC	Email to Whitney Pope regarding noteholder interest payments to Advanta for the claims reconciliation process.	0.30
08/18/2023	GB	Prepare recalculation of interest on investor notes.	2.90
	GB	Continue to prepare recalculation of interest on investor notes.	3.00
08/21/2023	GB	Prepare recalculation of interest on investor	

			HOURS
		notes.	2.30
09/06/2023	GB	Prepare an updated claims register.	0.20
10/12/2023	TFC	Review noteholder claims and for Anne Coyman.	0.20
10/18/2023	GB	Prepare reconciliation of noteholder's claims.	0.50
	MN	Prepare potential recovery summary.	1.20
	TFC	Emails to McKenna Novack regarding a potential recovery analysis.	0.30
10/30/2023	GB	Prepare an updated noteholder's claims register.	0.20
11/03/2023	GB	Prepare an updated claims reconciliation.	1.40
11/07/2023	TFC	Participate in Teams call with Brian Rich, Gabria Brenner, and Dan Stermer regarding Claims Review/Reconciliation and next steps regarding same and potential filing(s) related to same.	0.50
	TFC	Discussion with Gabria Brenner regarding an updated claims reconciliation.	0.30
	TFC	Email to Gabria Brenner regarding updates to the claims reconciliation.	0.10
	TFC	Prepare an updated claims reconciliation and review the number of claimants whose first investment was prior to January 2015.	2.30
	TFC	Email to Brian Rich regarding the number of claimants whose first investment was prior to January 2015.	0.20
	GB	Prepare updated claims reconciliation.	1.60
	GB	Discussion with Taylor Caruso regarding an updated claims reconciliation.	0.30
	GB	Participate in teams call with Brian Rich, Dan Stermer, and Taylor Caruso regarding claims review/reconciliation and the next steps regarding same and potential filing(s).	0.50
11/08/2023	TFC	Discussion with Gabria Brenner regarding an updated claims reconciliation.	0.50
	TFC	Prepare an updated claims reconciliation.	0.30
	TFC	Prepare an updated written summary of the claims reconciliation process for the claims administration motion.	1.30
	TFC	Emails to Gabria Brenner regarding a written summary of the claims reconciliation process.	0.20
	GB	Prepare claims process summary.	0.20
	GB	Discussion with Taylor Caruso regarding an updated claims reconciliation.	0.50
	GB	Prepare an updated claims reconciliation.	3.30
	GB	Continue to prepare updated claims reconciliation.	1.90
11/09/2023	GB	Prepare updated claims reconciliation.	0.50

			HOURS
11/15/2023	TFC	Discussion with Gabria Brenner regarding updated claims reconciliation.	0.20
	TFC	Review the updated claims reconciliation analysis.	1.30
	TFC	Email to Gabria Brenner regarding further updates to the claims reconciliation.	0.40
	GB	Prepare an updated claims reconciliation.	3.70
	GB	Discussion with Taylor Caruso regarding the updated claims reconciliation.	0.20
	GB	Continue to prepare an updated claims reconciliation.	2.50
11/16/2023	GB	Prepare an updated claims reconciliation.	3.50
	GB	Continue to prepare the updated claims reconciliation.	1.10
11/21/2023	TFC	Email to Gabria Brenner regarding updates to the claims reconciliation.	0.20
	GB	Prepare an updated claims reconciliation.	0.40
11/22/2023	TFC	Meeting with Gabria Brenner regarding the updated claims reconciliation.	1.10
	GB	Prepare an updated claims reconciliation.	0.40
	GB	Meeting with Taylor Caruso regarding the updated claims reconciliation.	1.10
11/28/2023	GB	Prepare pro rata claims distribution pool.	0.80
	GB	Participate in Teams call with Dan Stermer regarding updated/revised claims register and analysis of same.	0.20
	GB	Additional Teams call with Brian Rich and Dan Stermer regarding updated/revised claims analysis and next steps regarding analysis and related issues.	0.20
11/29/2023	GB	Prepare pro rata claims distribution pool.	0.60
12/04/2023	PJO	Participate in Teams call with Pat O'Malley and Brian Rich regarding claims related issues and status.	0.70
	PJO	Review of claims file and email to G. Brenner and T. Caruso regarding analysis of distributions to creditors.	0.30
12/05/2023	GB	Prepare schedule of pro-rata distributions for claimants by buckets.	1.20
	TFC	Review the summary of a hypothetical interim distribution.	0.40
	TFC	Email to Gabria Brenner regarding updates to the summary of a hypothetical interim distribution.	0.10
	PJO	Prepare analysis of the economics of a potential interim distribution and circulate to the working group.	0.30
12/06/2023	GB	Participate in multiple Teams calls with Dan	

			HOURS	
		Stermer regarding proposed pro rata claims distribution workbook and follow up regarding same and additional communication from Dan Stermer regarding same.	0.20	
	GB	Participate in Teams call with Pat O'Malley, Dan Stermer, Brian Rich, Michael Niles, and Gavin Gaukroger regarding claims related issues and next steps regarding same	0.40	
	PJO	Video call with D. Stermer, Gabria Brenner, Brian Rich, Michael Niles, and Gavin Gaukroger regarding claims-related issues and next steps regarding same.	0.40	
12/19/2023	GB	Prepare reconciliation of noteholder's claims.	1.80	
01/03/2024	GB	Prepare schedule of pro rata distributions for claimants by buckets.	0.30	
01/15/2024	GB	Review outstanding balance and payments to MCM 301 Yamato LLC.	0.70	
01/17/2024	GB	Prepare information needed for 1099s.	0.70	
06/05/2024	TFC	Email to Scott Silver regarding the proof of claim form submitted by Martin Kleinbart.	0.30	
	TFC	Telephone call with Scott Silver regarding the proof of claim form submitted by Martin Kleinbart.	0.10	
06/07/2024	TFC	Video call with Dan Stermer regarding claims related issues and Claims Register.	0.20	
09/17/2024	TFC	Video call with Dan Stermer regarding draft proposed Receiver's Motion to Commence Claims Process and discuss same.	0.20	
		Claims Analysis/Objections	322.00	65,642.00
01/26/2024	TLK	Prepare the 1099s.	1.00	n/c
		Tax Issues	0.00	0.00
06/20/2023	TFC	Email to Elaine Paul regarding a ShareFile site to upload transaction closing binders.	0.20	
10/06/2023	TFC	Emails to McKenna Novack regarding SHPC acquisitions.	0.30	
02/23/2024	TFC	Email to Dan Stermer regarding Seeman Holtz VUW, LLC.	0.20	
	TFC	Email to Dan Stermer regarding potential recovery from other affiliated entities.	0.20	
09/04/2024	TFC	Email to Elaine Paul regarding records at the old SHPC office.	0.20	
		Non-Debtor Affiliate Issues	1.10	427.00

			HOURS	
07/25/2023	TFC	Teams call with Dan Stermer regarding Grace Holdings and bank related information/data.	0.20	
	TFC	Prepare a summary of the Grace Holdings bank transactions related to Daniel Mahalic.	0.70	
	TFC	Email to Dan Stermer regarding a summary of the Grace Holdings bank transactions related to Daniel Mahalic.	0.30	
07/27/2023	TFC	Participate in multiple Teams calls with Dan Stermer regarding Grace Holdings bank detail and review of same.	0.30	
	TFC	Prepare an updated summary of the Grace Holdings bank transactions related to Daniel Mahalic.	1.10	
	TFC	Email to Dan Stermer regarding an updated summary of the Grace Holdings bank transactions related to Daniel Mahalic.	0.30	
07/31/2023	TFC	Email to Dan Stermer regarding the information for Grace Holdings transferred to Schoeppel law.	0.20	
		Non-Debtor Subsidiary Issues	3.10	<u>1,178.00</u>
03/08/2024	TFC	Prepare a list of the Prime Short Term Credit investors with addresses.	0.80	
	TFC	Email to Dan Stermer regarding the list of Prime Short Term Credit investors.	0.10	
		Third Party Claims	0.90	<u>355.50</u>
05/16/2023	TFC	Participate in conference call with Brian Rich and Dan Stermer in advance of upcoming call with Frank White/American Express counsel regarding same.	0.60	
	TFC	Teams call with Brian Rich and Dan Stermer regarding American Express and analysis related issues.	0.50	
	TFC	Prepare an updated analysis of Amex expenses and payments made by NSI vs SHPC.	1.80	
	TFC	Emails to Brian Rich and Dan Stermer regarding an updated analysis of Amex expenses and payments made by NSI vs SHPC.	0.50	
05/31/2023	PJO	Video call with Brian Rich and Dan Stermer regarding American Express and Locke Lord-related issues.	0.50	
07/17/2023	PJO	Emails with B. Rich and the DSI team regarding settlement negotiations with American Express.	0.10	
07/26/2023	TFC	Participate in Teams call with Dan Stermer regarding compensation summary and review/updating of same relative to potential recovery related next steps.	0.10	
	PJO	Video call with B. Rich and D. Stermer regarding next steps regarding potential recovery actions and issues relative to same.	0.50	

			HOURS
07/27/2023	TFC	Participate in Teams call with Dan Stermer regarding potential recovery related issues and potential next steps.	0.40
	TFC	Email to Dan Stermer regarding the updated advisor commission summaries and supporting schedules for the demand letters.	0.20
	TFC	Gather address information for demand letters to the former advisors.	0.50
07/28/2023	TFC	Participate in Teams call with Pat O'Malley, Dan Stermer, Brian Rich, Michael Niles, and Gavin Gaukroger regarding potential recovery related investigations/issues and next steps regarding same.	1.20
	TFC	Prepare an updated W-9 form and wire transfer form for the Amex settlement.	0.60
	TFC	Emails to Dan Stermer regarding an updated W-9 form and wire transfer form for the Amex settlement.	0.10
	TFC	Email to Gavin Gaukroger regarding evidence of communications with Wells Fargo.	0.10
	PJO	Video call with Dan Stermer, Taylor Caruso, Brian Rich, Michael Niles, and Gavin Gaukroger regarding potential recovery related investigations/issues and next steps regarding same.	1.20
07/31/2023	TFC	Email to Dan Stermer regarding an updated form W-9 and wire transfer form for the Amex settlement.	0.20
08/03/2023	TFC	Review Cloud9 for communications between Marshal Seeman and Wells Fargo.	1.20
	TFC	Email to Gavin Gaukroger regarding communications between Marshal Seeman and Wells Fargo.	0.30
08/15/2023	TFC	Email to Mike Niles regarding additional information regarding Brett Williams.	0.10
08/22/2023	TFC	Review the online banking portal to confirm that the Amex settlement proceeds have been received.	0.10
	TFC	Email to Dan Stermer regarding the Amex settlement proceeds.	0.10
10/03/2023	JO	Video call with William Diab, Michael Niles, and Taylor Caruso to address questions regarding other targets from counsel.	0.70
	TFC	Video call with William Diab, Michael Niles, and Jack O'Brien to address questions regarding other targets from counsel.	0.70
10/04/2023	TFC	Participate in Teams call with Dan Stermer regarding expansion of receivership and discuss same and issues relative to same.	0.30



			HOURS
10/06/2023	TFC	Video call with Gavin Gaukroger and Mike Niles regarding the Wells Fargo subpoenas and document productions.	0.70
10/09/2023	TFC	Email to Gavin Gaukroger regarding potential litigation with Wells Fargo.	0.30
10/10/2023	MN	Video call with Gavin Gaukroger, Michael Niles, and Taylor Caruso regarding potential litigation against Wells Fargo.	0.60
	TFC	Video call with Gavin Gaukroger, Michael Niles, and McKenna Novack regarding potential litigation against Wells Fargo.	0.60
10/11/2023	TFC	Review the updated insurance carrier subpoena tracker.	0.50
	TFC	Email to Mike Niles regarding the insurance carrier subpoena tracker.	0.30
	TFC	Email to Gavin Gaukroger regarding potential litigation with Wells Fargo.	0.40
10/16/2023	TFC	Email to Gavin Gaukroger regarding Well Fargo's involvement as a Trustee for several ILITs.	0.30
	TFC	Review CloudNine for documentation regarding Well Fargo's involvement as a Trustee for several ILITs.	1.50
10/17/2023	TFC	Email to William Diab and Mike Niles regarding prior communications between Rose Schindler and Eric Holtz.	0.30
	TFC	Review the list of targeted document production requests from Wells Fargo.	0.40
	TFC	Email to Gavin Gaukroger regarding a list of targeted document production requests from Wells Fargo.	0.10
10/18/2023	MN	Meeting with Taylor Caruso regarding preparation of potential recovery summary.	0.30
	TFC	Meeting with McKenna Novack regarding preparation of potential recovery summary.	0.30
10/19/2023	GB	Video call with William Diab, Taylor Caruso, and McKenna Novack regarding advisor commission demand letters.	0.60
	MN	Video call with William Diab, Taylor Caruso, and Gabria Brenner regarding advisor commission demand letters.	0.60
	TFC	Video call with William Diab, McKenna Novack, and Gabria Brenner regarding advisor commission demand letters.	0.60
10/20/2023	TFC	Phone call with Gavin Gaukroger and counsel for Wells Fargo regarding a subpoena for bank communications.	0.50

			HOURS
10/24/2023	TFC	Email to William Diab regarding additional excel commission statements for the former advisors.	0.10
10/25/2023	TFC	Email to Mike Niles regarding the correct spelling of names of the former advisors.	0.10
11/02/2023	TFC	Prepare an updated demand letter for Pelican Capital Management.	0.50
	TFC	Email to Gavin Gaukroger regarding an updated demand letter for Pelican Capital Management.	0.20
11/03/2023	TFC	Email to Brian Rich regarding the status of prior subpoenas issued to the insurance carriers.	0.30
11/06/2023	TFC	Prepare an updated demand letter for Fan Duel.	0.40
	TFC	Email to Gavin Gaukroger regarding an updated demand letter for Fan Duel.	0.20
	TFC	Email to Gavin Gaukroger regarding communications with Wells Fargo.	0.20
11/08/2023	TFC	Email to Mike Niles regarding communications from the Katchis family counsel.	0.30
11/10/2023	TFC	Review the draft subpoena to Shutts & Bowen.	0.30
	TFC	Email to Mike Niles regarding the draft subpoena to Shutts& Bowen.	0.20
	GB	Research settlement agreements on CloudNine for Rynders and Packard.	1.70
11/14/2023	GB	Research Akerman on CloudNine for evidence of fees related to Jeff Baxter, Rob Logan, John Kasbar or Scott Orth.	3.10
11/21/2023	TFC	Participate in Teams call with Dan Stermer and Michael Niles regarding upcoming Niles call with Katchis counsel regarding demand letters and issues relative to same.	0.20
01/17/2024	TFC	Email to William Diab regarding officers registered as securities brokers.	0.30
01/18/2024	TFC	Video call with Dan Stermer and Michael Niles regarding Akerman subpoena and search terms to be used.	0.30
01/19/2024	GB	Video call with Taylor Caruso, Dan Stermer, and Gavin Gaukroger regarding Pelican related issues.	0.70
	TFC	Video call with Dan Stermer, Gabria Brenner, and Gavin Gaukroger regarding Pelican related issues.	0.70
01/23/2024	TFC	Review CloudNine for communications between Seeman Holtz Management and Akerman.	1.30

		HOURS
	TFC Prepare a list of search terms for the Akerman subpoena.	0.80
	TFC Email to Mike Niles regarding a list of search terms for the Akerman Subpoena.	0.40
01/25/2024	TFC Video call with Daniel Stermer regarding upcoming Huling mediation and issues/analysis related to same.	0.20
01/29/2024	TFC Video call with Pat O'Malley and Gabria Brenner re: analysis of compensation paid to potential defendants and preparation for upcoming depositions.	0.30
	GB Video call with Pat O'Malley, Dan Stermer, Brian Rich, Gavin Gaukroger, William Diab, and Michael Niles regarding Huling mediation and follow up regarding same.	0.80
	GB Video call with Taylor Caruso and Pat O'Malley regarding analysis of compensation paid to potential defendants and preparation for upcoming depositions	0.30
	PJO Video call with D. Stermer, G. Brenner, B. Rich, G. Gaukroger, W. Diab, and M. Niles regarding Huling mediation and follow up regarding same.	0.80
	PJO Video call with T. Caruso and G. Brenner regarding analysis of compensation paid to potential defendants and preparation for upcoming depositions.	0.30
01/30/2024	TFC Review CloudNine for email communications between Baxter and Wells Fargo.	0.60
	TFC Email to Gavin Gaukroger regarding email communications between Baxter and Wells Fargo.	0.20
01/31/2024	TFC Emails to Mike Niles regarding search terms for the Akerman subpoena.	0.20
	TFC Prepare an updated list of search terms for the Akerman subpoena.	0.70
02/01/2024	GB Prepare necessary support regarding settlement communication with Pelican Capital.	0.30
02/07/2024	GB Video call with Pat O'Malley, Taylor Caruso, Dan Stermer, Brian Rich, Gavin Gaukroger, William Diab, and Michael Niles regarding mediation-related issues and analysis of same.	1.00
	TFC Video call with Pat O'Malley, Dan Stermer, Gabria Brenner, Brian Rich, Gavin Gaukroger, William Diab, and Michael Niles regarding mediation related issues and analysis of same.	1.00
	PJO Video call with D. Stermer, T. Caruso, G. Brenner, B. Rich, G. Gaukroger, W. Diab, and M. Niles regarding mediation related issues and analysis of same.	1.00
	PJO Review of sample complaint against salespersons	

			HOURS
		for commissions.	0.30
02/09/2024	TFC	Telephone calls with William Diab regarding search process for files in CloudNine.	0.20
	TFC	Video call with Pat O'Malley, Dan Stermer, and Gabria Brenner and Brian Rich, Gavin Gaukroger, Michael Niles, and William Diab with regard to advisor compensation analysis.	0.80
	TFC	Email to Dan Stermer and William Diab regarding the PEO service agreement example.	0.10
	PJO	Preparation for call with DSI and Berger Singerman with regard to advisor compensation analysis.	0.10
	PJO	Video call with T. Caruso regarding status of response from Alpha Staff and results of additional analysis performed of the Alpha Staff Professional Employer Organization (PEO).	0.20
	PJO	Review of documents related to the Alpha Staff Professional Employer Organization (PEO).	0.30
02/12/2024	PJO	Research background of Italo Alejandro Petterson a/k/a Alexander Petterson, former president of Seeman Holtz Private client, LLC.	0.20
02/14/2024	PJO	Review of materials relating to compensation paid to P. Kapela and related litigation against National Senior Insurance.	0.20
03/08/2024	TFC	Video call with Pat O'Malley regarding potential litigation with Wells Fargo.	0.40
	PJO	Video call with Daniel Stermer regarding potential recovery action related to Wells Fargo and next steps regarding same.	0.30
	PJO	Video call with T. Caruso regarding potential litigation with Wells Fargo.	0.40
	PJO	Research other litigation involving fraud and Wells Fargo.	0.30
03/11/2024	TFC	Video call with Pat O'Malley regarding a timeline of the business relationship with Wells Fargo.	0.50
	TFC	Video call with Pat O'Malley and Dan Stermer and Brian Rich, Gavin Gaukroger, William Diab, and Michael Niles regarding ongoing investigation and potential recovery action against Wells Fargo and issues relative to same.	0.50
	PJO	Video call with D. Stermer, T. Caruso and B. Rich, G. Gaukroger, W. Diab, and M. Niles regarding ongoing investigation and potential recovery action against Wells Fargo and issues relative to same. (P. O'Malley attended portion of longer call)	0.40
	PJO	Video call follow up with D. Stermer regarding Wells Fargo-related issues.	0.10
	PJO	Video call with T. Caruso regarding timeline of	

			HOURS
		events and nature of the business relationship with Wells Fargo.	0.50
	PJO	Review of emails with Wells Fargo representatives.	0.20
	PJO	Review of timeline of events and nature of the business relationship with Wells Fargo.	0.40
03/12/2024	TFC	Prepare a timeline of the companies interactions and business relations with Wells Fargo.	1.50
03/13/2024	TFC	Meeting with Pat O'Malley regarding the Wells Fargo timeline and summary exhibits to be prepared.	1.50
	TFC	Video call with Dan Stermer regarding ongoing investigation(s) and potential recovery action(s) and issues related to same.	0.20
	TFC	Prepare a timeline of the companies interactions and business relations with Wells Fargo.	1.80
	TFC	Email to Gavin Gaukroger regarding search terms for Wells Fargo.	0.10
	TFC	Review CloudNine for communications to and from Wells Fargo.	1.90
	PJO	Meeting with T. Caruso regarding analysis of information related to Wells Fargo activities.	1.50
03/14/2024	TFC	Review CloudNine for communications to and from Wells Fargo.	2.30
	TFC	Email to Pat O'Malley regarding CloudNine research and communications to Wells Fargo.	0.10
03/15/2024	TFC	Video call with Pat O'Malley regarding research for the Wells Fargo litigation.	0.30
	PJO	Video call with T. Caruso regarding research for the Wells Fargo litigation.	0.30
03/18/2024	TFC	Review CloudNine for email communications to and from Locke Lord and the FL OFR.	0.30
	TFC	Email to Dan Stermer regarding email communications on CloudNine to and from Locke Lord and the FL OFR.	0.10
	TFC	Review CloudNine for email communications to and from Wells Fargo regarding their involvement as securities intermediary and primary bank (AM).	3.10
	TFC	Review CloudNine for email communications to and from Wells Fargo regarding their involvement as securities intermediary and primary bank (AM).	2.60
03/19/2024	TFC	Create custom tags in CloudNine for email communications to and from Locke Lord and the FL OFR.	0.20
	TFC	Email to Dan Stermer regarding email communications on CloudNine to and from Locke	

		HOURS
	Lord and the FL OFR.	0.10
TFC	Email to Jesus Pena regarding attachments for a CloudNine doc ID.	0.10
TFC	Review CloudNine for email communications to and from Wells Fargo regarding their involvement as securities intermediary and primary bank.	1.20
PJO	Review of Appellate Court decision in Oasis International Group as to whether the Receiver has standing to bring maintain fraudulent-transfer and common-law tort claims against alleged accomplices.	0.20
03/20/2024	TFC Video call with Dan Stermer regarding ongoing investigation and potential recovery related issues regarding Wells Fargo/Financial Institutions and information/data.	0.20
	PJO Analysis of timing and interest rates paid by the various fund raising entities and email to T. Caruso regarding same.	0.30
03/21/2024	TFC Review CloudNine for email communications to and from Wells Fargo regarding their involvement as securities intermediary and primary bank.	1.80
03/22/2024	TFC Video call with Pat O'Malley and Dan Stermer and Brian Rich, Gavin Gaukroger, Michael Niles, and William Diab and Jim Sallah, Joshua Katz, David Buckner, and Scott Silver regarding potential Wells Fargo claims and ongoing investigation/preparation of same and potential engagement/next steps regarding same.	2.00
	TFC Video call with Pat O'Malley regarding summary of PPE cash activity at Wells Fargo.	0.40
	TFC Review CloudNine for email communications to and from Wells Fargo regarding their involvement as securities intermediary and primary bank.	3.60
	TFC Email to the Berger Singerman team regarding a timeline of the companies' interactions with Wells Fargo.	0.10
	TFC Email to Gavin Gaukroger regarding a timeline of Wells Fargo's due diligence process and communications regarding Para Longevity 2014-5, LLC.	0.30
	PJO Review of schedule of interest rates for various investors.	0.20
	PJO Video call with T. Caruso regarding summary of PPE cash activity at Wells Fargo.	0.40
	PJO Video call with D. Stermer, T. Caruso, B. Rich, G. Gaukroger, M. Niles, W. Diab, J. Sallah, J. Katz, D. Buckner, and S. Silver regarding potential Wells Fargo claims and ongoing investigation/preparation of same and potential engagement/next steps regarding same.	2.00

			HOURS
03/25/2024	TFC	Video call with Pat O'Malley and Dan Stermer and Gavin Gaukroger, Michael Niles, William Diab and Alan Hodge regarding ongoing investigations and potential litigation regarding same.	1.80
	TFC	Review CloudNine for email communications to and from Wells Fargo regarding their involvement as securities intermediary and primary bank.	1.10
	PJO	Video call with D. Stermer, T. Caruso, G. Gaukroger, M. Niles, W. Diab and A. Hodge regarding ongoing investigations and potential litigation regarding same.	1.80
03/26/2024	PJO	Video calls with D. Stermer regarding status of today's mediation and settlements reached in two of the matters.	0.20
03/27/2024	TFC	Email to Gavin Gaukroger regarding communications with counsel for Pelican.	0.10
03/28/2024	TFC	Video call with Pat O'Malley and Dan Stermer and Brian Rich, Gavin Gaukroger, and Michael Niles, and Jim Sallah, Scott Silver, and David Buckner regarding Wells Fargo investigation/potential recovery and next steps regarding same.	0.70
	TFC	Video call with Pat O'Malley regarding research into the companies' historical interactions with Wells Fargo.	0.60
	TFC	Video call with Pat O'Malley regarding further research of relationships with Wells Fargo.	0.50
	TFC	Email to William Diab regarding additional Wells Fargo communications and timeline research from CloudNine.	0.50
	TFC	Prepare an updated timeline of the company's interactions with Wells Fargo.	1.40
	PJO	Video call with T. Caruso regarding research into the companies' historical	0.50
	PJO	Video call with T. Caruso regarding further research of relationships with Wells Fargo.	0.60
	PJO	Video call with D. Stermer, T. Caruso, B. Rich, G. Gaukroger, M. Niles, J. Sallah, Scott Silver, and D. Buckner regarding Wells Fargo investigation/potential recovery and the next steps regarding same. (O'Malley attended portion of longer call).	0.40
03/29/2024	TFC	Telephone calls with William Diab regarding the Wells Fargo Timeline and their role as Securities Intermediary.	0.90
	TFC	Emails to William Diab regarding research into Wells Fargo's communications and interactions with the company.	0.20

			HOURS
	TFC	Email to Jennifer Jimenez regarding addresses for the former advisors.	0.10
	TFC	Email to Dan Stermer and Mike Niles regarding additional former advisors to pursue litigation against.	0.10
04/01/2024	TFC	Prepare an exhibit of the intercompany transfers within Wells Fargo.	3.60
	TFC	Email to Dan Stermer regarding an exhibit of the intercompany transfers within Wells Fargo.	0.20
	TFC	Prepare total compensation exhibits for the litigation with various former advisors.	2.70
	TFC	Review the total compensation exhibits for the litigation with various former advisors.	0.50
	TFC	Email to Dan Stermer regarding the total compensation exhibits for the litigation with various former advisors.	0.40
	TFC	Emails to Pat O'Malley regarding Cloud9 research into communications with US Bank.	0.30
	TFC	Review emails within CloudNine for communications with US Bank.	1.80
04/02/2024	PJO	Video call with T. Caruso regarding intercompany exhibits for the litigation with Wells Fargo.	0.20
	TFC	Video call with Pat O'Malley regarding intercompany exhibits for the litigation with Wells Fargo.	0.20
	TFC	Prepare updated intercompany exhibits to and from Wells Fargo accounts.	1.80
04/03/2024	PJO	Video call with T. Caruso regarding intercompany exhibits for the litigation with Wells Fargo.	0.20
	TFC	Video call with Pat O'Malley regarding intercompany exhibits for the litigation with Wells Fargo.	0.20
	TFC	Email to William Diab regarding former advisor compensation.	0.30
	TFC	Prepare updated intercompany exhibits to and from Wells Fargo accounts (AM).	2.80
	TFC	Prepare updated intercompany exhibits to and from Wells Fargo accounts (PM).	3.10
	TFC	Review updated intercompany exhibits to and from Wells Fargo accounts.	0.60
	TFC	Email to Dan Stermer regarding updated intercompany exhibits to and from the Wells Fargo accounts.	0.30
04/04/2024	TFC	Telephone call with Mike Niles regarding advisor not referral exhibits.	0.10
	TFC	Prepare additional compensation exhibits for former advisors.	0.90
	TFC	Email to William Diab regarding former advisor compensation.	0.20
	TFC	Prepare exhibits of investor note referrals for	



			HOURS
		each former advisor.	2.30
	TFC	Review exhibits of investor note referrals for each former advisor.	0.40
	TFC	Emails to Mike Niles regarding investor note referrals for each former advisor.	0.50
04/08/2024	TFC	Telephone calls with William Diab regarding exhibits and information for the Wells Fargo litigation.	0.20
	TFC	Prepare exhibits of the various bank accounts at Wells Fargo.	0.60
	TFC	Emails to William Diab regarding the bank account exhibits.	0.20
	TFC	Email to William Diab regarding relevant facts for the Wells Fargo complaint.	0.50
	TFC	Email to William Diab regarding investor notes for Centurion ISG Services, LLC.	0.20
	TFC	Email to William Diab regarding various roles held by each company under the DZ Bank and Teleios credit facilities.	0.30
	TFC	Review the DZ Bank and Teleios credit agreements and other supporting documentation.	0.80
04/09/2024	PJO	Video call with T. Caruso regarding amount of transfers through US Bank.	0.40
	TFC	Video call with Pat O'Malley regarding an exhibit of US Bank transaction activity.	0.40
	TFC	Prepare an updated of intercompany activity between the Para Longevity entities and Centurion Insurance Services Group for the Pelican litigation.	1.30
	TFC	Email to Gavin Gaukroger regarding an updated intercompany activity between the Para Longevity entities and Centurion Insurance Services Group for the Pelican litigation.	0.20
04/11/2024	PJO	Video call with D. Stermer, T. Caruso and the Berger Singerman team and Class Action team regarding Wells Fargo's investigation/potential litigation and issues related to same.	1.40
	TFC	Video call with Pat O'Malley and Dan Stermer and Berger Singerman Team and Class Action Team regarding Wells Fargo investigation/potential litigation and issues related to same.	1.40
	TFC	Create a ShareFile folder to share information with new Class Action counsel.	0.70
	TFC	Email to new Class Action counsel regarding information available on ShareFile.	0.60
04/22/2024	TFC	Prepare for and participate in video call with Gavin Gaukroger, Michael Niles, and Brian Rich and Dan Stermer regarding investigation/potential recovery related issues involving FNBCC and issues relative to same and prepare/send multiple communications regarding same.	1.20

		HOURS
	TFC Review and gather emails for the Wells Fargo litigation.	1.40
04/23/2024	PJO Telephone call with T. Caruso and T. Jeremiassen regarding exhibits for the Wells Fargo litigation.	0.20
	PJO Video call with T. Caruso, T. Jeremiassen and S. Ferrero regarding response to lawyers questions in the Wells Fargo litigation.	1.50
	TFC Telephone call with William Diab regarding preparation for the Wells Fargo litigation.	0.20
	TFC Telephone call with Pat O'Malley and Tom Jeremiassen regarding exhibits for the Wells Fargo litigation.	0.20
	TFC Video call with Mike Niles and William Diab regarding the Wells Fargo document production and requests from the class action counsel.	1.00
	TFC Video call with Spencer Ferrero, Tom Jeremiassen, and Pat O'Malley regarding cash tracing for the Wells Fargo litigation.	1.50
	TFC Video call with Daija Lifshitz regarding email searches in CloudNine.	0.70
	TFC Email to William Diab regarding investments made by Stanley Sussman and a summary of his cash transactions.	0.40
	TFC Email to Mike Niles regarding contacts at US Bank that communicated with Seeman Holtz.	0.20
	TFC Review CloudNine for contacts at US Bank that communicated with Seeman Holtz.	0.60
	TFC Review and gather requested documents by the Class Action Counsel for the Wells Fargo litigation.	3.10
	TPJ Call with Pat O'Malley and Taylor Caruso regarding Wells Fargo litigation.	0.20
	TPJ Video call with Pat O'Malley, Taylor Caruso and Spencer Ferrero regarding cash tracing analysis for Wells Fargo litigation.	1.50
	TPJ Review of cash tracing analysis for Wells Fargo litigation, and discussion with Spencer Ferrero regarding same.	0.50
	SGF Video call with Taylor Caruso, Tom Jeremiassen, and Pat O'Malley regarding cash tracing for the Wells Fargo litigation.	1.50
	SGF Review correspondence related to possible Ponzi scheme analysis.	0.70
04/24/2024	TFC Video call with Tom Jeremiassen regarding cash tracing for the Wells Fargo litigation.	0.50
	TFC Video call with Dan Stermer and Brian Rich, Gavin Gaukroger, Michael Niles, and William Diab and Tom Jeremiassen (partial) and Spencer Ferrero (partial) regarding preparation of complaint and banking-related issues.	1.40
	TFC Emails to Desiree Wyatt and Scott Silver regarding access to the Wells Fargo litigation ShareFile.	0.30

		HOURS
	TFC Review access to the Wells Fargo litigation ShareFile.	0.40
	TFC Prepare draft exhibits for the Wells Fargo litigation.	1.10
	TFC Email to Tom Jeremiassen and Spencer Ferrero regarding draft exhibits for the Wells Fargo litigation.	0.20
	TFC Review and gather requested documents by the Class Action Counsel for the Wells Fargo litigation.	3.30
	TPJ Video call with Dan Stermer, Taylor Caruso, Spencer Ferrero and counsel regarding Wells Fargo litigation (Tom Jeremiassen partial).	0.60
04/25/2024	TFC Video call with Dan Stermer regarding Wells Fargo data/information and staff/counsel-related discussions.	0.30
	TFC Video call with Peter Spett, Jim Sallah, Josh Katz, and David Buckner regarding the Wells Fargo litigation and available information.	0.80
	TFC Telephone call with Rowen Dizon and Spencer Ferrero regarding review of ILIT policy documents (0.4) and forensic accounting review (0.5) for possible Wells Fargo litigation.	0.90
	TFC Email to Mike Niles and William Diab regarding information requested by the Class Counsel for the Wells Fargo litigation.	0.30
	TFC Email to Dan Stermer, Berger Singerman, and Class Counsel regarding status of information requests for the Wells Fargo litigation.	0.20
	TFC Review and gather requested documents by the Class Action Counsel for the Wells Fargo litigation.	2.60
	TFC Email to Josh Katz regarding the Securities Account Control Agreements with DZ Bank and Teleios and Wells Fargo.	0.20
	TFC Email to David Buckner regarding a list of contacts at Wells Fargo that communicated with Seeman Holtz.	0.20
	TFC Email to Jesus Pena and Amelie Escobio regarding emails from CloudNine to be shared with Class Counsel.	0.30
	TFC Review CloudNine for emails to and from Wells Fargo and prepare a custom tag.	0.50
	TPJ Review and e-mails with Taylor Caruso, Dan Stermer and counsel regarding Wells Fargo litigation.	0.40
	RCD Telephone calls (4) Spencer Ferrero for review of ILIT policy documents for possible Wells Fargo litigation	0.60
	RCD Telephone calls with Spencer Ferrero and Taylor Caruso regarding review of ILIT policy documents (0.4) and forensic accounting review (0.5) for possible Wells Fargo litigation.	0.90
	RCD Review and analyze non-current policy folders (A-C) for ILIT documents related to Wells	

			HOURS
		Fargo.	2.10
	SGF	Telephone calls (4) with Rowen Dizon regarding review of ILIT policy documents for possible Wells Fargo litigation.	0.60
	SGF	Telephone call with Rowen Dizon and Taylor Caruso regarding review of ILIT policy documents (0.4) and forensic accounting review (0.5) for possible Wells Fargo litigation.	0.90
04/26/2024	TPJ	Review and e-mails with Dan Stermer and counsel regarding the Wells Fargo litigation.	0.40
	RCD	Review and analyze non-current policy folders (G-K) for ILIT documents related to Wells Fargo.	3.40
	RCD	Review and analyze non-current policy folders (C-G) for ILIT documents related to Wells Fargo.	3.40
04/29/2024	PJO	Video call with T. Caruso regarding the Wells Fargo litigation support.	0.40
	PJO	Video calls with T. Caruso and S. Ferrero regarding the Wells Fargo litigation support.	1.30
	TFC	Video calls (3) with Pat O'Malley and Spencer Ferrero regarding exhibits for the Wells Fargo litigation.	1.30
	TFC	Video call with Pat O'Malley regarding exhibits for the Wells Fargo litigation.	0.40
	TFC	Review and gather requested documents by the Class Action Counsel for the Wells Fargo litigation (AM).	3.70
	TFC	Review and gather requested documents by the Class Action Counsel for the Wells Fargo litigation (PM).	1.80
	TFC	Prepare an updated cash flow exhibits for the Wells Fargo litigation.	1.30
	RCD	Review and analyze non-current policy folders (K-P) for ILIT documents related to Wells Fargo.	3.00
	RCD	Review and analyze non-current policy folders (P-Z) for ILIT documents related to Wells Fargo.	3.40
	TPJ	Review of flow of funds analysis, and call with Spencer Ferrero regarding same.	0.40
	SGF	Telephone calls (3) with Pat O'Malley and Taylor Caruso (one partial) regarding status of exhibits for possible Wells Fargo litigation.	1.30
04/30/2024	PJO	Video call with T. Caruso, S. Ferraro and T. Jeremiassen regarding support for the Wells Fargo litigation.	0.50
	PJO	Video call with T. Caruso regarding draft Exhibits for the Wells Fargo litigation.	0.10
	PJO	Video call with Berger Singerman, class action counsel and the DSI team regarding status of the Wells Fargo litigation (O'Malley partial).	0.50
	TFC	Telephone call with Tom Jeremiassen, Spencer	

			HOURS
		Ferrero, and Pat O'Malley regarding exhibits for the Wells Fargo litigation.	0.50
TFC		Video call with Dan Stermer, Tom Jeremiassen, Spencer Ferrero, and Pat O'Malley (partial) and Berger Singerman and Class Counsel regarding ongoing Wells Fargo investigation and recovery efforts and the next steps regarding same.	1.30
TFC		Video call with Pat O'Malley regarding exhibits for the Wells Fargo litigation.	0.10
TFC		Telephone call with William Diab regarding requests for information from the Class Counsel.	0.10
TFC		Email to Dan Stermer regarding the demand letter to Fifth Ave Physician Services.	0.20
TFC		Email to Mike Niles regarding ownership of Silver Point Capital and JEMS LLC.	0.30
TFC		Review and gather requested documents by the Class Action Counsel for the Wells Fargo litigation (AM).	3.60
TFC		Review and gather requested documents by the Class Action Counsel for the Wells Fargo litigation (PM).	3.40
TPJ		Video call with Pat O'Malley, Taylor Caruso and Spencer Ferrero regarding flow of funds in preparation for Wells Fargo litigation.	0.50
TPJ		Video call with Dan Stermer, Pat O'Malley, Taylor Caruso, Spencer Ferrero, Berger Singerman and class action counsel regarding Wells Fargo litigation.	1.30
TPJ		Review of cash tracing for Wells Fargo litigation.	0.70
SGF		Video call with Taylor Caruso, Tom Jeremiassen, Daniel Stermer, and Pat O'Malley (partial) and Berger Singerman and Class Counsel regarding ongoing Wells Fargo investigation and recovery efforts and next steps regarding same.	1.30
SGF		Video call with Taylor Caruso, Tom Jeremiassen, and Pat O'Malley regarding ongoing Wells Fargo investigation and recovery efforts and next steps regarding same.	0.50
05/01/2024	TFC	Review and gather requested documents by the Class Action Counsel for the Wells Fargo litigation (AM).	3.50
	TFC	Review and gather requested documents by the Class Action Counsel for the Wells Fargo litigation (PM).	2.60
	TFC	Email to Jesus Pena regarding attachments for emails in CloudNine.	0.10
05/02/2024	TFC	Video call with Etan Mark, Daija Lifshitz, and Gavin Gaukroger regarding other potential litigation targets.	0.80
	TFC	Telephone call with Tom Jeremiassen, Spencer Ferrero, and Pat O'Malley regarding exhibits for the Wells Fargo litigation.	0.50

		HOURS
	TFC Emails to Peter Spett and Josh Katz regarding the cash tracing examples for the Wells Fargo complaint.	0.30
	TFC Email to Dan Stermer, Berger Singerman, and the Class Action Counsel regarding status of various information requests and ownership structure for the entities that held the life insurance policies.	0.70
	TFC Review and gather requested documents by the Class Action Counsel for the Wells Fargo litigation (AM).	3.20
	TFC Review and gather requested documents by the Class Action Counsel for the Wells Fargo litigation (PM).	2.80
	TFC Emails to Daija Lifshitz regarding Locke Lord emails.	0.20
	TFC Review and gather requested documents for the Locke Lord Litigation.	1.40
	TFC Email to Etan Mark and Daija Lifshitz regarding requested documents for the Locke Lord Litigation.	0.20
	TPJ Call with Taylor Caruso, Pat O'Malley and Spencer Ferrero regarding Wells Fargo litigation.	0.50
	TPJ Review of cash tracing analyses for Wells Fargo litigation.	0.70
	SGF Video call with Taylor Caruso, Tom Jeremiassen, and Pat O'Malley regarding ongoing Wells Fargo investigation and recovery efforts and next steps regarding same.	0.50
	SGF Telephone call with Taylor Caruso regarding review of possible transfers from newer funds to older funds for investor distributions.	0.10
	SGF Review and analyze sources and uses database to identify possible transfers from newer funds to older funds for investor distributions.	3.20
	SGF Review and analyze bank statements to identify possible transfers from newer funds to older funds for investor distributions.	3.40
	SGF Create exhibit for example of transfer from newer fund to older funds for investor distributions.	1.10
	PJO Video call with T. Caruso, T. Jeremiassen and S. Ferrero regarding the Wells Fargo litigation support.	0.50
05/03/2024	TFC Telephone call with William Diab regarding the draft complaint.	0.50
	TFC Review the draft Wells Fargo complaint (AM).	3.70
	TFC Review the draft Wells Fargo complaint (PM).	2.10
	SGF Create exhibit for example of transfer from newer fund to older funds for investor distributions.	1.40
05/05/2024	TFC Review the draft Wells Fargo complaint (AM).	3.20
	TFC Review the draft Wells Fargo complaint (PM).	1.80

		HOURS
05/06/2024	SGF Video call with Taylor Caruso, Tom Jeremiassen, Daniel Stermer, and Pat O'Malley and Berger Singerman and Class Counsel regarding ongoing Wells Fargo investigation and recovery efforts and next steps regarding same.	0.70
	SGF Review list of transactions from new to old PPE as part of possible litigation.	1.20
	SGF Review draft of the Wells Fargo litigation complaint.	1.70
	TPJ Review of draft Wells Fargo complaint, and e-mails with counsel regarding same.	0.40
	TPJ Call with Dan Stermer, Pat O'Malley, Taylor Caruso, Spencer Ferrero, Berger Singerman and class action counsel regarding Wells Fargo litigation.	0.70
	TFC Video call with P. O'Malley regarding the draft Wells Fargo complaint.	0.20
	TFC Video call with Pat O'Malley, Dan Stermer, Tom Jeremiassen, Spencer Ferrero, and Berger Singerman and Class Counsel regarding draft Wells Fargo Complaint and status/redrafting of same.	0.70
	TFC Video call with Gavin Gaukroger and Dan Stermer regarding the Wells Fargo draft complaint.	0.20
	TFC Video call with Gavin Gaukroger regarding the Wells Fargo draft complaint (AM).	1.90
	TFC Video call with Gavin Gaukroger regarding the Wells Fargo draft complaint (PM).	2.20
	TFC Review the draft Wells Fargo complaint (AM).	3.10
	TFC Review the draft Wells Fargo complaint (PM).	3.40
	TFC Email to William Diab regarding comments on the draft Wells Fargo complaint.	0.30
	TFC Prepare an exhibit of life insurance policies held in the various Securities Intermediary accounts at Wells Fargo.	1.20
	TFC Review an exhibit of life insurance policies held in the various Securities Intermediary accounts at Wells Fargo.	0.30
	TFC Email to Gavin Gaukroger and William Diab regarding comments on the Wells Fargo draft complaint and updated exhibits.	0.30
	PJO Video call with D. Stermer, T. Caruso, T. Jeremiassen, S. Ferrero, and Berger Singerman and Class Counsel regarding draft Wells Fargo Complaint and status/redrafting of same.	0.70
	PJO Review of the draft Wells Fargo complaint and forward comments to counsel.	0.80
	PJO Video call with T. Caruso regarding the draft Wells Fargo complaint.	0.20
05/07/2024	SGF Telephone call with Taylor Caruso regarding status of exhibits for possible Wells Fargo litigation.	0.20
	SGF Review and analyze sources and uses database to identify possible transfer of funds from new	

		HOURS
	PPE to old PPE via Centurion as part of possible Wells Fargo litigation.	2.90
JO	Video call with Daniel Stermer, Taylor Caruso, and Pat O'Malley and Gavin Gaukroger, Michael Niles, and William Diab regarding status of preparation of various recovery complaints and next steps.	0.70
TPJ	Review of draft Wells Fargo complaint.	0.50
TFC	Video call with Gavin Gaukroger regarding the Wells Fargo draft complaint.	1.50
TFC	Telephone call with Spencer Ferrero regarding cash tracing examples for the Wells Fargo complaint.	0.20
TFC	Video call with Gavin Gaukroger and William Diab regarding the Wells Fargo draft complaint.	0.70
TFC	Video call with Dan Stermer, Jack O'Brien, and Pat O'Malley and Gavin Gaukroger, Michael Niles, and William Diab regarding status of preparation of various recovery complaints and next steps.	0.70
TFC	Prepare updated compensation exhibits for the former advisor demand letters.	1.90
TFC	Emails to Mike Niles and Kerry Burns regarding updated compensation exhibits for the former advisor demand letters.	0.20
TFC	Prepare updated note referral exhibits for the former advisor demand letters.	1.20
TFC	Emails to Mike Niles regarding updated compensation exhibits for the former advisor demand letters.	0.20
TFC	Review the draft Wells Fargo complaint (AM).	3.30
TFC	Review the draft Wells Fargo complaint (PM).	1.10
TFC	Review the draft Pelican complaint.	0.80
TFC	Email to Gavin Gaukroger regarding the draft Pelican complaint.	0.10
PJO	Video call with T. Caruso, J. O'Brien, and D. Stermer and G. Gaukroger, M. Niles, and W. Diab regarding status of preparation of various recovery complaints and next steps.	0.70
05/08/2024	TFC Video call with Mike Niles, Gavin Gaukroger, and Dan Stermer regarding the draft Wells Fargo complaint and the draft Sussman complaint [TC Partial]	1.80
	TFC Email to Jack O'Brien regarding the beneficial ownership forms provided by Wells Fargo.	0.20
	TFC Review the beneficial ownership forms provided by Wells Fargo.	0.40
	TFC Review ILIT agreements for which Jeff Baxter was the Trustee.	0.60
	TFC Email to William Diab regarding ILITs for which Jeff Baxter was the Trustee.	0.20
	TFC Review the draft Wells Fargo complaint (AM).	3.70
	TFC Review the draft Wells Fargo complaint (PM).	3.10
	TFC Emails to Gavin Gaukroger regarding the draft	



			HOURS
		Wells Fargo complaint.	1.10
	TFC	Email to Mike Niles regarding the net transaction activity between the receivership entities and Jeff Baxter.	0.30
	TFC	Review the draft Wells Fargo complaint (Evening).	1.90
	PJO	Review of revised drafts of the complaint against Wells Fargo and related emails.	0.40
05/09/2024	TFC	Telephone call with Mike Niles regarding the complaint against the former advisors.	0.30
	TFC	Telephone call with Mike Niles and William Diab regarding the complaint against the former advisors.	0.20
	TFC	Video call with Dan Stermer and Gavin Gaukroger, Michael Niles, and William Diab regarding status of drafting of various Complaints and finalization of same.	0.40
	TFC	Review the draft Wells Fargo complaint (AM).	3.80
	TFC	Review the draft Wells Fargo complaint (PM).	2.60
	TFC	Emails to Gavin Gaukroger regarding the draft Wells Fargo complaint.	0.40
05/10/2024	TFC	Emails to William Diab regarding supporting documents for the Wells Fargo complaint.	0.20
	TFC	Email to the Class Counsel regarding additional documents uploaded to ShareFile.	0.70
	TFC	Review and upload additional documentation to ShareFile for the Class Counsel.	3.10
05/13/2024	TFC	Video call with Dan Stermer regarding Wells Fargo related issues and Class Counsel and next steps regarding same.	0.30
05/14/2024	TFC	Telephone call with Brett Von Borke regarding information requests from the Class Counsel.	0.20
	TFC	Email to Brett Von Borke regarding the life insurance policy applications and references to the Stranger Originated Life Insurance ("STOLI") provisions.	0.70
	PJO	Emails with D. Stermer and counsel from Berger Singerman regarding next steps in the Wells Fargo litigation.	0.10
05/15/2024	TFC	Telephone call with Brett Von Borke regarding information requests from the Class Counsel.	0.30
	TPJ	E-mails with Taylor Caruso regarding banking expert.	0.10
05/22/2024	PJO	Research background of proposed litigation experts.	0.20
	PJO	Emails with D. Stermer and legal team regarding experts to use in bank litigation.	0.10
05/30/2024	TFC	Email to the Class Counsel regarding potential information requests for their Wells Fargo	

			HOURS
		complaint.	0.10
06/04/2024	PJO	Video call with D. Stermer, T. Caruso, G. Gaukroger, M. Niles, M. Sawyer and potential Banking Expert regarding potential engagement.	0.70
	PJO	Research background and status of National Financial Services.	0.20
	TFC	Video call with Pat O'Malley and Dan Stermer, and Gavin Gaukroger, Michael Niles, and Maxwell Sawyer and potential Banking Expert regarding potential engagement.	0.70
	TFC	Email to Brett Bon Borke regarding a list of the Para Longevity companies.	0.10
	TFC	Prepare a list of the Para Longevity companies.	0.40
06/05/2024	PJO	Video call with D. Stermer, Taylor Caruso, Gavin Gaukroger and Michael Niles and potential banking expert.	0.80
	TFC	Video call with Pat O'Malley and Dan Stermer and Gavin Gaukroger and Michael Niles and potential banking expert.	0.80
06/07/2024	TFC	Telephone call with William Diab, Jesse Richman, and Max Sawyer regarding transition from Cloud9 to a new E-Discovery platform.	0.60
06/10/2024	TFC	Telephone call with William Diab, Jesse Richman, and Jesus Pena regarding transition from CloudNine to a new E-Discovery platform.	0.40
	TFC	Emails to Gavin Gaukroger regarding the various Centurion Entities.	0.70
06/12/2024	TFC	Video call with Dan Stermer regarding ESI related issues and status and potential next steps regarding same.	0.20
	TFC	Email to Brett Von Borke regarding Wells Fargo's earliest involvement with Seeman Holtz.	0.50
06/18/2024	TFC	Telephone call with Gavin Gaukroger, William Diab, Brett Bon Borke, and David Buckner regarding the discovery process for the Wells Fargo litigation.	0.50
	TFC	Video call with Pat O'Malley, Dan Stermer, and Josh Cann and Brian Rich, Michael Niles, Gavin Gaukroger, William Diab, and Max Sawyer regarding Wells Fargo litigation and related issues.	1.00
	TFC	Email to Mike Niles regarding bank account information for the Iberia/First Horizon Bank subpoena.	0.40
	JSC	Video call with Pat O'Malley, Taylor Caruso, and Dan Stermer and Brian Rich, Michael Niles, Gavin Gaukroger, William Diab, and Max Sawyer regarding Wells Fargo litigation and related issues.	1.00

			HOURS
	PJO	Video call with Dan Stermer, Taylor Caruso, and Josh Cann and Brian Rich, Michael Niles, Gavin Gaukroger, William Diab, and Max Sawyer regarding Wells Fargo litigation and related issues	1.00
06/26/2024	TFC	Prepare a template to evaluate the different VDR options.	0.30
	TFC	Email to William Diab regarding a template to evaluate the different VDR options.	0.10
07/09/2024	TFC	Video call with Dan Stermer and Jack O'Brien and Pat O'Malley (partial) and Brian Rich, Gavin Gaukroger, and Michael Niles and Jesse Richman regarding Wells Fargo litigation-related issues and other pending litigation matters.	1.60
	JO	Video call with Taylor Caruso and Daniel Stermer and Pat O'Malley (partial) and Brian Rich, Gavin Gaukroger, and Michael Niles and Jesse Richman regarding Wells Fargo litigation related issues and other pending litigation matters.	1.60
	PJO	Video call with T. Caruso and J. O'Brien and D. Stermer and B. Rich, G. Gaukroger, M. Niles and J. Richman regarding Wells Fargo litigation-related issues and other pending litigation matters (O'Malley partial).	1.00
07/10/2024	TFC	Telephone call with Gavin Gaukroger, Mike Niles, William Diab, Brett Von Borke, and Amelie Escobio regarding the ESI and discovery process for the Wells Fargo litigation.	0.60
07/15/2024	TFC	Video call with Dan Stermer regarding ESI related issues.	0.20
	TFC	Video call with Jesse Richman, William Diab, Mike Niles, Jeffrey Hajny, Gavin Gaukroger, Tera Piserchio, Brett Von Borke and Dan Stermer regarding ESI related issues.	0.80
07/16/2024	JO	Video call with Pat O'Malley and Taylor Caruso and Daniel Stermer and Gavin Gaukroger, Michael Niles, William Diab, and Max Sawyer regarding various litigation matters and next steps regarding same.	0.90
	TFC	Video call with Max Sawyer regarding the list of custodians for the initial disclosures.	0.80
	TFC	Video call with Pat O'Malley and Dan Stermer and Jack O'Brien and Gavin Gaukroger, Michael Niles, William Diab, and Max Sawyer regarding various litigation matters and next steps regarding same.	0.90
	TFC	Prepare a list of custodians for the initial disclosures.	3.20
	TFC	Emails to Max Sawyer regarding a list of	

			HOURS
		custodians for the initial disclosures.	0.40
	PJO	Video call with D. Stermer, T. Caruso, J. O'Brien, G. Gaukroger, M. Niles, W. Diab, and M. Sawyer regarding various litigation matters and next steps regarding same.	0.90
07/17/2024	TFC	Email to Gavin Gaukroger regarding the Pelican litigation.	0.80
	TFC	Review the Pelican Designated Beneficiary Agreements.	0.50
	TFC	Prepare a summary of the Pelican Designated Beneficiary Agreements.	0.30
	TFC	Prepare a list of custodians for the initial disclosures.	2.90
07/18/2024	TFC	Video call with William Diab, Jeffrey Hajny, Jesus Pena, Brian Kelley, Dustin Stuflick, Tera Piserchio, Brett Von Borke, David Buckner, and Dan Stermer regarding various ESI issues and transition to Everlaw.	0.30
	TFC	Additional video call with Dan Stermer regarding ESI related issues and ongoing investigation/analysis related issues.	0.50
	TFC	Review and gather email names, email addresses, and titles for relevant individuals for the initial list of custodian in the Wells Fargo litigation.	1.80
	TFC	Email to Dan Stermer regarding a list of custodians for the Wells Fargo litigation.	0.20
07/19/2024	TFC	ESI call with Tera Piserchio, Brett Von Borke, Jesus Pena, and William Diab regarding ESI issues and transfer of data to Everlaw.	0.50
	TFC	Videoo calls (x3) with William Diab regarding ESI issues and transfer of data to Everlaw.	1.20
	TFC	Video call (x3) with Dan Stermer regarding ESI issues and transfer of data to Everlaw.	0.40
	TFC	Video call with Pat O'Malley regarding status of ESI discussions.	0.20
	TFC	Prepare a scenario analysis of the different ESI options.	1.70
	TFC	Review the scenario analysis of the different ESI options.	0.50
	TFC	Email to Dan Stermer regarding the ESI scenario analysis.	0.20
	TFC	Email to Jesus Pena regarding an export of the SharePoint records from the virtual machine.	0.20
	PJO	Telephone call with T. Caruso regarding status of ESI discussions.	0.20
07/22/2024	TFC	Video call with Dan Stermer and Berger Singerman attorneys regarding Wells Fargo and litigation strategy related issues and upcoming call with Wells Fargo Counsel and issues relative to same.	0.80
	TFC	Video call with Dan Stermer and Berger	

			HOURS
		Singerman and Class Counsel regarding upcoming call with Wells Fargo Counsel and issues relative to same.	0.40
08/01/2024	TFC	Video call with Max Sawyer regarding the Pelican litigation.	0.30
	TFC	Emails to William Diab regarding a note referral exhibit for a former advisor.	0.20
	TFC	Prepare an exhibit of transactions between various PPE's and Pelican.	0.30
	TFC	Email to Max Sawyer regarding an exhibit of transactions between various PPE's and Pelican.	0.10
08/12/2024	TFC	Participate in mediation sessions with Dan Stermer and the Berger Singerman Team regarding the Pelican Litigation [Taylor Caruso partial].	1.10
	TFC	Emails to Max Sawyer regarding the initial disclosures for the Wells Fargo litigation.	0.10
08/13/2024	TFC	Video call with Max Sawyer regarding the initial disclosures for the Wells Fargo litigation.	0.50
	TFC	Prepare an updated list for the initial disclosures.	0.40
	TFC	Review the updated list for the initial disclosures.	0.10
	TFC	Email to Max Sawyer regarding the updated list for the initial disclosures.	0.20
08/14/2024	TFC	Video call with William Diab and Max Sawyer regarding the initial disclosures for the Wells Fargo litigation.	0.80
	TFC	Email to Max Sawyer regarding the updated list for the initial disclosures.	0.20
08/15/2024	TFC	Email to Max Sawyer regarding the updated list for the initial disclosures.	0.20
08/16/2024	TFC	Review the initial disclosures.	0.20
	TFC	Email to Max Sawyer regarding comments on the initial disclosures.	0.10
08/27/2024	TFC	Video call with Dan Stermer, Pat O'Malley, and Jack O'Brien and Brian Rich, Michael Niles, Gavin Gaukroger, William Diab, and Max Sawyer regarding litigation related matters, status, and next steps and issues related to same.	0.50
	PJO	Video call with D. Stermer, T. Caruso, J. O'Brien and B. Rich, M. Niles, G. Gaukroger, W. Diab, and M. Sawyer regarding litigation related matters, status, and next steps and issues related to same.	0.50
09/03/2024	TFC	Emails to Max Sawyer regarding discovery considerations in the Pelican litigation.	0.30

			HOURS
09/06/2024	TFC	Review communication from Brett Von Borke regarding insurance policy related issues, review same, and video call with Dan Stermer regarding same.	0.10
	TFC	Emails to Brett Von Borke regarding previously received information from the various insurance carriers under subpoena.	0.80
	TFC	Telephone call with Amelie Escobio regarding previously received information from the various insurance carriers under subpoena.	0.10
	TFC	Email to Amelie Escobio regarding previously received information from the various insurance carriers under subpoena.	0.10
09/09/2024	TFC	Video call with Dan Stermer and Gavin Gaukroger, Max Sawyer, William Diab, Brian Rich, and Michael Niles regarding Wells Fargo discovery-related issues and the next steps.	0.80
09/12/2024	TFC	Email to Brett Von Borke regarding a listing of the U.S. Bank accounts.	0.30
	TFC	Email to Brett Von Borke regarding the life insurance policies where Wells Fargo was acting as Trustee for ILITs.	0.40
	TFC	Emails to Amelie Escobio regarding the master life insurance policy listing.	0.30
09/13/2024	TFC	Video call with Amelie Escobio regarding the master life insurance policy listing and bank transaction database excel files.	0.50
09/18/2024	TFC	Telephone call with Max Sawyer regarding ESI and the discovery process in the WF litigation.	0.20
	TFC	Emails to Max Sawyer regarding the ESI review process.	0.20
09/24/2024	TFC	Video call with Dan Stermer and Gavin Gaukroger, Max Sawyer, William Diab, and Jesse Richman regarding discovery related issues and status and next steps.	0.50
09/30/2024	TFC	Video call with Max Sawyer and Jesse Richman regarding ESI for the Wells Fargo litigation.	0.40
		Litigation Support	350.80
			<hr/> 152,108.00
09/20/2023	TFC	Email to Gabriel Acosta regarding availability of pre-2015 bank statements.	0.10
09/26/2023	TFC	Multiple Teams calls with Dan Stermer regarding follow up to OFR related issues and next steps regarding request for documents.	0.20
10/02/2023	TFC	Email to Greg Melchior regarding a list of explanations as to why the receiver is entitled to additional bank statements from the Office	

		HOURS	
	of Financial Regulation.	0.30	
	Government Contact	0.60	228.00
06/22/2023	TFC Review the draft receivership report.	0.40	
	TFC Prepare language regarding the claims reconciliation process for the draft receivership report.	0.60	
	TFC Email to Dan Stermer regarding comments on the draft receivership report.	0.10	
05/31/2024	TFC Review the Receiver's 4th report for the court.	1.00	
	TFC Email to Dan Stermer regarding the Receiver's 4th report for the court.	0.10	
	Reports For Court	2.20	852.50
10/26/2023	TFC Email to McKenna Novack regarding the life insurance policy for Beatrice Cayzer.	0.10	
10/27/2023	TFC Email to McKenna Novack regarding the life insurance policy for Beatrice Cayzer.	0.20	
	TFC Review emails on CloudNine regarding prior life insurance policies.	0.80	
11/07/2023	TFC Review transaction documents for the various Boies life insurance policies.	0.40	
	TFC Email to William Diab regarding transaction documents for the various Boies life insurance policies.	0.40	
	Life Insurance Policies	1.90	722.00
FOR THE FOREGOING PROFESSIONAL SERVICES RENDERED:		1869.90	570,040.00

RECAPITULATION

CONSULTANT	HOURS	HOURLY RATE	TOTAL
P. J. O'Malley	18.70	\$775.00	\$14,492.50
P. J. O'Malley	41.30	795.00	32,833.50
T. F. Caruso	276.30	380.00	104,994.00
T. F. Caruso	386.70	395.00	152,746.50
T. P. Jeremiassen	12.30	695.00	8,548.50
G. Brenner	224.50	295.00	66,227.50
G. Brenner	90.80	305.00	27,694.00
J. S. Cann	229.20	75.00	17,190.00
M. Novack	108.00	295.00	31,860.00
S. G. Ferrero	52.70	470.00	24,769.00
R.C. Dizon	9.80	275.00	2,695.00
R.C. Dizon	24.50	280.00	6,860.00
J. O'Brien	200.40	275.00	55,110.00
J. O'Brien	43.80	290.00	12,702.00
A. A. Vazquez	150.90	75.00	11,317.50

TOTAL CURRENT WORK

570,040.00

BALANCE DUE

\$570,040.00